

IN THE DIOCESE OF VIRGINIA  
BEFORE THE TITLE IV HEARING PANEL  
THE MATTER OF  
THE REV'D DR. B. CAYCE RAMEY, RESPONDENT

**Respondent's Response to Church Attorney's Statement on Respondent Witnesses**

**Background**

The Church Attorney apparently contends that this Title IV matter has nothing to do with theology or the doctrine, discipline, and worship of the Episcopal Church. While he asserts that the Hearing Panel is not, “a theological debating society,” which clearly it is not, he cites, with special emphasis, that Canon IV.1 applies to Members of the Clergy, “who have by their vows at ordination accepted additional responsibilities and accountabilities for doctrine, discipline, worship and obedience.” This particular mandate is profoundly theological. The Church Attorney correctly asserts that the Hearing Panel is charged with determining, “the credibility, reliability and weight to be given to all testimony and other evidence.” Yet the clear implication of the Church Attorney’s argument is the Hearing Panel should make a determination in this matter ignoring any theological basis for the doctrine, discipline and worship of the church and ignoring any evidence that Respondent violated neither canons, nor rubrics, nor vows.

**The Relevance of Respondent's Proposed Witness Testimony**

In its February 19, 2024, Decision and Order, the Hearing Panel required that Respondent, in addition to identifying all expected witnesses, “identify all matters as to which every identified expected witness would be called to testify...” Respondent complied with that Order on February 20 and listed each expected witness and a detailed description of the substance and matters upon which they are expected to testify.

Mr. Taylor, one of the identified witnesses, is the former Junior and Senior Warden of All Saints, Sharon Chapel where Fr. Ramey served. Respondent identified that Mr. Taylor, “can describe how the parish was and was not affected by Fr. Ramey’s actions,” how Fr. Ramey was supported by the Vestry of the parish, how Fr. Ramey engaged All Saints with the emerging Potomac Episcopal Community (which Fr. Ramey also served at relevant times) and how Fr. Ramey never denied communion to anyone. This anticipated testimony goes directly to some of the offences charged: duty to refrain from habitual neglect of public worship and Holy Communion, duty to conform to the rubrics, duty to refrain from holding or teaching doctrine contrary to that held by the Church and conduct unbecoming.

Similarly, Ms. Stanley, All Saint's Sharon Chapel's former Senior Warden in a relevant time can testify to how the parish was and was not affected by Fr. Ramey's actions, how the vestry supported his actions and how he never denied anyone communion. This anticipated testimony goes directly to the duty to refrain from habitual neglect of public worship and Holy Communion, duty to conform to the rubrics, duty to refrain from holding or teaching doctrine contrary to that held by the Church and conduct unbecoming.

The Rev'd Katherine Sonderegger, Ph.D. is an Episcopal priest, a theologian and a faculty member of the faculty of the Virginia Theological Seminary. Respondent described her anticipated testimony as connecting the theology underlying Fr. Ramey's eucharistic fast with the meaning of the ordination vows in the Book of Common Prayer, which he is accused of violating. There is nothing "irrelevant and immaterial" about testimony which lays out the connection between theology and an understanding of ordination vows. To assert this testimony is "irrelevant and immaterial" is to assert that the ordination vows, the canons, and the rubrics of the Book of Common Prayer have no theological basis whatever or that there may be only one acceptable theological view in interpreting them. The matters described in Professor Sonderegger's anticipated testimony are directly pertinent to the offenses charged and Respondent's defense against those offenses.

The Rev'd Ms. Weierbach was a ministry partner in the Potomac Episcopal Community during relevant times. She participated in the discussions among the PEC clergy who supported Fr. Ramey in his fast. As disclosed, she can describe his faithfulness in his journey on deciding to engage in a fast and her observations of the movement of the Holy Spirit in his life. Her anticipated testimony goes directly to neglect of public worship, conformity with the rubrics, holding or teaching any doctrine contrary to the Church and conduct unbecoming.

Bishop Gardner is also one of the Church Attorney's witnesses. Since the Church Attorney will put on his case prior to Respondent's defense, any questions Respondent has for Bp. Gardner will be reserved for cross-examination.

Respondent does not anticipate calling Carolyn Lanier or Joyce Mercer as witnesses in his case at this time.

Professor Mark Jefferson was Assistant Professor of Homiletics at Virginia Theological Seminary during relevant times. He is a Baptist pastor. He was identified as a witness qualified to testify about the inadequacy of the efforts of the Episcopal Church to address white supremacy and, as a former VTS professor, to describe Episcopal clerical formation and the movement of the Holy Spirit in Fr. Ramey's life. As a person hired by Virginia seminary to train and form Episcopal clergy, he is competent, at least, to testify to whether Respondent held or taught any doctrine contrary to the Church or engaged in conduct unbecoming.

Although the Church Attorney dismisses The Rev'd Dr. Kinney as a "Baptist pastor." Dr. Kinney is a world-renowned theologian. He is the Distinguished Professor of Theology at the Samuel DeWitt Proctor School of Theology at Virginia Union University in Richmond. He worked closely with Respondent, as his advisor, while he was doing his D.Min thesis in seminary. He can describe Respondent's journey and process towards his fast as affected by his academic studies and personal experiences. His expertise in the connection between academic theology and practical/parish-based theology and life can illustrate how Respondent's decision as a matter of conscience to engage in a eucharistic fast is consistent with the vows he took at ordination and how Respondent neither holds nor teaches any doctrine contrary to the Church and that his actions do not constitute conduct unbecoming.

Dr. Paula Parker, who teaches at Union Presbyterian Seminary in Richmond worked with Fr. Ramey on his D.Min thesis project. She can describe how Fr. Ramey's thesis project and his exposure to womanist theology, generational trauma, and the ongoing effects of slavery in the Episcopal Church affected his decision to engage in a Eucharistic fast. She can testify that his behavior was faithful rather than disobedient. Her testimony speaks directly to the alleged offenses of failing to abide by vows, failing to conform to the rubrics of the BCP, holding or teaching any doctrine contrary to the Church and conduct unbecoming.

All the information set out in Respondent's disclosure of anticipated witnesses identifies matter material and relevant to the issues of this case and is admissible as evidence.

Respectfully and faithfully submitted,

/s/Jack W. Burtch, Jr.  
Counsel to Respondent

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I certify that a copy of this Response to the Church Attorney's Statement on Respondent Witnesses has been provided by email to Brian Carr, Esquire, the Rev'd Herbert Jones, the Rev'd Crystal Hardin, the Rt. Rev'd E. Mark Stevenson, J.P. Causey, Esquire, Bradfute W. Davenport, Esquire, Thomas Hahn, Esquire, the Rt. Rev'd Susan E. Goff, the Rev'd Edward O. Miller, Jr.; the Rev'd Canon d'Rue Hazel.

/s/Jack W. Burtch, Jr.

Date: February 27, 2024