

**IN THE DIOCESE OF VIRGINIA
BEFORE THE HEARING PANEL IN THE
TITLE IV MATTER OF
THE REVEREND DR. CAYCE RAMEY, RESPONDENT**

**THE HEARING PANEL SHOULD IMPOSE ADDITIONAL SANCTIONS
ON THE RESPONDENT FOR HIS DISOBEDIENCE OF THE
DISCIPLINARY BOARD'S FEBRUARY 12, 2024 ORDER**

Pursuant to Canon IV.13.11, the Church Attorney states as follows:

1. On January 15, 2024, the Disciplinary Board issued its Decision on Notice of Appeal from Hearing Panel Sanction Order.
2. In that Decision, the Disciplinary Board ruled that the "Respondent violated Canon IV.13.11(a) to at least the extent of committing conduct 'contrary to the integrity of the proceedings'". Accordingly, the Disciplinary Board denied the Respondent's appeal from this Hearing Panel's December 4, 2023 Order granting the Church Attorney's Motion for Sanctions.
3. In its Decision, the Disciplinary Board further ordered corrective sanctions in four numbered paragraphs. Paragraphs 1 and 2 ordered the Respondent to take specified actions "no later than fifteen days from receipt" of the Decision by email.
4. The fifteen-day deadline expired January 30, 2024.
5. Waiting until the last minute, the Respondent filed a Motion to Reconsider Sanctions Nos. 2 and 4 with the Disciplinary Board on January 29, 2024.
6. On February 12, 2024, the Disciplinary Board denied the Respondent's Motion to Reconsider.
7. In its February 12, 2024 Order the Disciplinary Board further ordered as follows:
 2. Not later than February 16, 2024, which is four days from the filing by email of this Decision on the RECONSIDERATION MOTION, the Respondent is to send to the Church Attorney and to Respondent's Counsel the names and communications addresses of all Clergy, but not Laity, to whom the September 23, 2023, email was sent.
8. On February 15, 2024, the Respondent's counsel notified the Disciplinary Board and this Hearing Panel that the Respondent chose not to do what the Disciplinary Board

ordered him to do by February 16, 2024, in its February 12, 2024 Order quoted in paragraph 7 above.

9. Respondent did not meet the February 16, 2024, deadline.

10. Members of the Clergy, such as the Respondent, are not free to choose which Orders of Title IV bodies, such as the Disciplinary Board, they will obey and which they will not obey.

11. The Respondent's choice not to do what the Disciplinary Board ordered him to do, and what this Hearing Panel ordered him to do previously, constitutes his failure to "...abide by the requirements of any applicable ...Order" within the meaning of Canon IV.4.1(d).

12. The Respondent's choice is in addition to his failure to cooperate with this proceeding under authority of Title IV, which this Hearing Panel has already adjudicated once and the Disciplinary Board twice, ruling all three times against the Respondent.

13. The Respondent's failures and choices are contemptuous and constitute brazen flouting and snubbing of the authority of this Hearing Panel, the Disciplinary Board, and Title IV. They are "disruptive, dilatory, or otherwise contrary to the integrity of the proceeding" within the meaning of Canon IV.13.11(a). The Respondent is making a mockery of the Episcopal Church.

WHEREFORE, the Church Attorney suggests that the Hearing Panel impose further sanctions on the Respondent, including but not limited to refusing to allow the Respondent to support his defenses or oppose the Church Attorney's claims, refusing to allow the Respondent to introduce matters into evidence, and striking the Respondent's claims, defenses and responses, all as specifically enumerated in Canon IV.13.11(b)(3)-(5), and such other sanctions as the Hearing Panel may deem meet and just.

The Church Attorney submits that the March 6-8, 2024 hearing should be limited to the sentence the Hearing Panel will recommend to the Bishop, obviating the need for numerous witnesses to suffer the inconvenience of coming to the hearing, saving the time of the Hearing Panel and others, and avoiding considerable expense to the Diocese and the parties.

Date: February 17, 2024

/s/ Bradfute W. Davenport, Jr., Church Attorney
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