

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

**CHURCH ATTORNEY'S MOTION FOR SANCTIONS**

Pursuant to Canon IV.13.11, the Church Attorney hereby moves the Hearing Panel to impose sanctions on the Respondent on the following grounds.

1. The Church Attorney has just learned that the Respondent has communicated with various individuals who are potential witnesses concerning activities in this case.
2. The Respondent's communications are by periodic emails in the form attached hereto as Exhibit A.
3. While some of the email contents are not material to this Motion, one portion is troubling. It is in the September 23, 2023 email, where Respondent states (highlighted in yellow in Exhibit A):

On the off chance your name appeared in some email somewhere in the past few years and so you get contacted by the Diocesan attorney, Brad Davenport, please know you are under no obligation to speak with him or to not speak with him either way. If he does call you, I would appreciate knowing. Very few if any of you should get contacted.

4. With respect to Members of the Clergy, Respondent's advice that they are under no obligation to speak with the Church Attorney exposes them to Title IV accountability themselves. Canon IV.3.1(b) specifically says that a Member of the Clergy shall be subject to proceedings under Title IV for "(b) failing without good cause to cooperate with any investigation or proceeding under authority of this Title".
5. With respect to all recipients, clergy and lay, Respondent's advice that they are under no obligation to speak with the Church Attorney conflicts with the intent of Canon IV.19.18, which provides as follows:

Except as otherwise provided in this Title, or except for good cause shown as determined by the Hearing Panel, it shall be the duty of all members of the Church to appear and testify or respond when duly served with a notice to do so from any Panel in any matter arising under this Title.

6. With respect to all recipients, clergy and lay, Respondent's communications constitute witness or attempted witness tampering.

7. The Church Attorney submits that Respondent's conduct is "disruptive, dilatory, or otherwise contrary of the integrity of the proceedings" within the meaning of Canon IV.13.11, and therefore sanctionable.

8. The Church Attorney requests that the Hearing Panel order the Respondent to forthwith: (a) identify all persons to whom he has sent such communications, (b) produce and describe all communications, oral and written, he has sent regarding this proceeding to all such persons, (c) send amended and correct communications to all such persons, copying the Hearing Panel and the Church Attorney, and (d) cease and desist from communicating with anyone advising them that they need not speak with the Church Attorney or stating or implying that they need not appear and testify or respond at the hearing of this matter, unless excused by the Hearing Panel..

9. The Church Attorney further requests that the Hearing Panel impose further sanctions on the Respondent proportionate to the underlying misconduct pursuant to Canon IV.13.11, including but not limited to the sanctions enumerated therein and as to the Hearing Panel may seem right and just.

Date: November 6, 2023

*/s/ Bradfute W. Davenport, Jr.*

Bradfute W. Davenport, Jr.

Church Attorney

[davenportbw@gmail.com](mailto:davenportbw@gmail.com)

804-690-3136