

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

**Church Attorney's Response to Respondent's Motion to Redact  
Exhibit A to Church Attorney's Motion for Sanctions**

As shown below, the Respondent's problem is of his own making.

(1) He sent the string of three emails to an unknown number of his "friends." As stated in the September 23, 2023, email, the emails are a series of "periodic updates." The Respondent intended his readers to read them together. See the September 23, 2023, email, where he says, "I've included my August update below, as I've added a few folks to the list," and the next to last paragraph of all three emails. To pluck any of them out of the string or to redact any portions of them would result in taking them out of the context in which the Respondent intended and sent them.

(2) There is no reasonable expectation of privacy in sending emails in today's world. And there is nothing suggesting the Respondent expected the recipients to keep them or their contents confidential.

(3) Apparently noticing Respondent's erroneous and improper canonical advice in the September 23, 2023, email, one of its recipients, a member of the clergy, took appropriate steps that resulted in the emails being brought to the attention of the Church Attorney. That was entirely predictable.

(4) The Church Attorney promptly brought the matter to the attention of the Hearing Panel by filing the Motion for Sanctions on November 6, 2023.

(5) The Respondent said nothing to the Hearing Panel or the Church Attorney about redaction.

(6) Ten days later, on November 16, 2023, the Respondent filed his Response to the Motion for Sanctions. Not only did he say nothing about redaction, but he also referred to allegedly "punitive actions" the Diocese had taken against him, including alleged revocation of his credentials to participate in Annual Convention. But Respondent had addressed that very point in his October 31, 2023, email. Having injected that issue in both that email and in his Response, he now asks the Hearing Panel to "remove in [its] entirety" the October 31, 2023, email.

(7) On November 24, 2023, the Church Attorney filed his Surreply. The Hearing Panel conducted a hearing on the Motion for Sanctions on November 29, 2023. On neither occasion did the Respondent say anything about redaction.

(8) The Hearing Panel ruled against the Respondent on December 4, 2023, in its Order on Church Attorney's Motion for Sanctions. Nine days later, with his Motion to Redact, the Hearing Panel heard of Respondent's redaction concern, for the first time.

(9) The emails have been on the Diocesan website and referred to in filings posted there, as required by Canon IV.13.3, continuously for seven weeks. That public dissemination is canonically required to be done "in such a way as to make them broadly known to the Church and the Church media."

(10) From November 6, 2023, when the Motion for Sanctions was posted, to December 21, 2023, the Title IV Hearing Panel Proceedings page on the website (this case is the only proceeding there), has had 224 visits by 64 individuals. It is reasonable to conclude that many, if not most, have seen the emails the Respondent seeks to redact.

(11) The Respondent advances no credible reason why the emails "should not be part of the record in this matter." They already are a part of the record in this matter and there is no canonical authority for the Hearing Panel to undo what has already been done, without objection by the Respondent, until now.

(12) The Hearing Panel cannot and should not undo what has been done, without objection by the Respondent, until nine days after the Hearing Panel ruled against him.

The Church Attorney requests that the Motion to Redact be denied.

Date: December 27, 2023

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