

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

Motion for Recusal of Bishop Diocesan

Respondent, the Rev'd Dr. B. Cayce Ramey, respectfully moves the Hearing Panel to request the recusal of the Rt. Rev'd Mark Stevenson from any consideration of this matter.

The grounds of this motion are that, as set forth below, Bishop Stevenson and the Complainant, the Rt. Rev'd Susan Goff, consulted together and agreed, prior to the Complaint being filed, that a Complaint against Dr. Ramey should be filed under Title IV of the Canons of the Episcopal Church. Such consultation and agreement prior to the filing of a Complaint makes Bishop Stevenson, in effect, a co-Complainant and thus disqualified from making any decisions, at any time, as Bishop Diocesan in this matter.

In her testimony before the Hearing Panel, on March 6, 2024, Bishop Goff was quite clear that prior to filing a Complaint against Fr. Ramey she and then Bishop-elect Stevenson had "consensus" and "agreement" on the need to file the charge against Fr. Ramey. That testimony is set out below.

1 MR. BURTCH: Were you were in conversation

2 with Bishop Stevenson about filing this complaint,

3 weren't you?

4 BP. GOFF: I was.

5 MR. BURTCH: Okay. And what were the nature of

6 your conversations with Bishop Stevenson in connection

7 with filing this complaint?

8 BP. GOFF: He had been elected as Bishop

9 Diocesan, and he was -- at that point, he was to be

10 consecrated bishop on December 4. So that I would no

11 longer be ecclesiastical authority; he would. So our
12 conversations were first, about conveying the
13 information because he would then be the bishop who was
14 overseeing this process; and conversations about how
15 best to proceed given the transition that we as a
16 diocese were in.

17 MR. BURTCH: And -- and you talked with him
18 before you wrote this November 11 charge?

19 BP. GOFF: Yes.

20 MR. BURTCH: Didn't you? Yeah. And did you
21 tell him that you were going to do this, or?

22 BP. GOFF: Yes.

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1 MR. BURTCH: Okay. Did he encourage you to do
2 it?

3 BP. GOFF: I can't say that he encouraged me.

4 I can say that we had consensus, we had agreement on --

5 MR. BURTCH: So there was agreement between --

6 BP. GOFF: -- on the need to do it and then

7 how to do it.

8 MR. BURTCH: Right. So there was agreement

9 between you and the bishop --

10 BP. GOFF: Yes.

11 MR. BURTCH: -- at that time, the Bishop-

12 elect.

13 BP. GOFF: Elect? Correct.

14 MR. BURTCH: That you filed this charge?

15 [Silence] no, the -- the day before. I'm looking now at

16 Joint Exhibit 23 --

17 MALE 1: Be sure it's right.

18 MR. BURTCH: -- 23. Which is your November 10

19 notes on your conversation with Father Ramey. Did you

20 discuss in your -- your upcoming conversation with

21 Father Ramey, with the -- with Bishop Stevenson -- or

22 then Bishop-elect, Stevenson?

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1 BP. GOFF: Do you mean before this meeting?

2 MR. BURTCH: Before -- before this meeting.

3 Before the November 10 meeting? Yes.

4 BP. GOFF: Without looking at calendar, I

5 can't say precisely. I imagine that I did.

(Transcript of Hearing, pp. 96-98)

Under the Canons of the Church, after the Hearing Panel has issued its order the Bishop Diocesan is charged with pronouncing Sentence. The Bishop has the authority to modify or pronounce a lesser sentence than proposed in the Hearing Panel's Order. (Title IV.14.8(b))

Under these circumstances, the Canons provide that the Bishop Diocesan was required to disqualify himself since, as shown by Bishop Goff's testimony above, his impartiality may reasonably be questioned. Bp. Stevenson was "in conversation" with Bp. Goff about "how best to proceed" before the charge was filed. He was consulted by Bishop Goff, prior to her final meeting with Fr. Ramey, and they reached "consensus" and "agreement" on the need for a Title IV charge to be filed against him. (Tr. 96-98)

Title IV.19.14 (a) provides as follows:

Sec. 14. Impartiality of officials and bodies described in this Title shall be addressed as follows:

a. Any Bishop Diocesan exercising authority under this Title shall disqualify herself or himself in any proceeding in which the Bishop's impartiality may reasonably be questioned. The Bishop shall also disqualify himself or herself when the Bishop, the Bishop's spouse, or a person within the third degree of relationship to either of them, or the spouse of such person, is the Respondent, Complainant or an Injured Person.

Bishop Goff disqualified herself from any consideration of this matter since she was the named Complainant. But she did not become the Complainant until after she had first discussed and agreed on the matter with Bishop-elect Stevenson. She testified that they had "consensus" and "agreement" on the matter. Under these circumstances, there is no question that Bishop Stevenson's "impartiality may reasonably be questioned," since, according to Bp. Goff's testimony, he was an actor who participated in the decision to file the charge. Thus, the Canon requires that he be disqualified from participation in this proceeding.

For these reasons, Respondent moves the Hearing Panel to request that Bishop Stevenson disqualify himself from participation in this matter.

Respectfully submitted,

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

Date: April 3, 2024

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I certify that a copy of this Motion for Recusal of Bishop Diocesan 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: April 3, 2024