

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

**Response of Church Attorney to
Respondent's Motion for Stay of Proceedings**

The Church Attorney responds to the Respondent's Motion for Stay of Proceedings ("Stay Motion") as follows:

(1) While the caption of the Stay Motion says it is filed before a Hearing Panel, it is actually, and confusingly, addressed to the members of the Reference Panel, not to the Hearing Panel. The Reference Panel referred the case to the Hearing Panel on October 28, 2024. The Reference Panel no longer has any jurisdiction in this case or to entertain the Stay Motion. The Church Attorney is sending this response to the members of both the Hearing Panel and the Reference Panel.

(2) Before it referred the case to the Hearing Panel, the Reference Panel appointed an Investigator pursuant to Title IV.11. On September 30, 2024, the Respondent asked the Reference Panel to "suspend further investigation of this matter until the Court of Review makes its decision" in the first case involving the Respondent, decided by the first Hearing Panel on May 8, 2024. The grounds for the Respondent's request were substantially the same as those he advances in the pending Stay Motion.

On October 1, 2024, the Reference Panel declined to suspend further investigation, stated it would advise the Investigator to proceed with finalizing his Report, and, tellingly, reminded the Respondent of his duty to cooperate with the investigation.

Thus, this Stay Motion is the Respondent's second bite at the same apple.

(3) On October 21, 2024, the Investigator submitted his Investigative Report. After a thorough investigation, including interviews of the Respondent and six witnesses and review of documents, the Investigator found that the Respondent disobeyed the Administrative Leave at issue, in violation of Title IV.4.1(d).

On October 28, 2024, the Reference Panel met and reviewed the Investigative Report. Under Title IV.11.3, the Reference Panel had several possible options, from taking no action other than an appropriate pastoral response pursuant to Title IV.8, to referring the matter to a Hearing Panel pursuant to Title IV.13. It chose the latter route. This Hearing Panel was appointed the same day.

The Church Attorney thereafter filed his Statement of Alleged Offenses on October 29, 2024, pursuant to Title IV.13.2. The Respondent filed his Response on December 4, 2024. Pursuant to Title IV.13.5(a), that filing triggered the sixty-day deadline for the parties to submit their mandatory disclosures by February 3, 2025. It is that deadline the Respondent seeks to delay with his Stay Motion.

(4) The Respondent says in his Stay Motion that the “grounds of this motion are that any decision of the Court of Review [from the first Hearing Panel’s May 8, 2024 Order] may affect the validity and efficacy of the Administrative Leave which was SOLELY PREMISED on the Order of the Hearing Panel, now under review.” (Emphasis supplied.) He is wrong, for several reasons.

(A) Bishop Stevenson specifically stated in his May 25, 2024 Administrative Leave that it “is separate and distinct from any action [he] may take regarding sentencing in response to the Order of 8 May 2024.” On its face, that puts the lie to Respondent’s “solely premised” argument.

(B) Bishop Stevenson was canonically entitled and required by Title IV.7.3 to place the Respondent on Administrative Leave at any time Bishop Stevenson determined that the Respondent “may have committed any Offense, or that the good order, welfare or safety of the Church or any person or Community may be threatened by that member of the Clergy.” He could do so “without prior notice or hearing.” That is precisely what he did. And as set forth in (A) above, Bishop Stevenson was careful to state that the Administrative Leave was separate and distinct from any action he might take regarding sentencing in response to the first Hearing Panel’s Order of May 8, 2024 that is the subject matter of the pending Appeal to the Court of Review. In other words, it is a fallacy to argue, as the Respondent does, that the Administrative Leave and the appeal are joined at the hip.

(C) The case before the Hearing Panel is not limited to the Respondent’s Administrative Leave and resulting violation of Title IV.4.1(d)’s mandate that the Respondent “abide by the requirements of any applicable... placement on Administrative Leave issued under Canon IV.7.” Just as importantly, it includes a charge in paragraph six of the Church Attorney’s Statement of Alleged Offenses that during the course of the Investigator’s interview of the Respondent, the Respondent “failed without good cause to cooperate with the Investigation conducted under authority of Title IV, in violation of Title IV.3.1(b).” That Canon imposes a solemn obligation on a Member of the Clergy “to cooperate with any investigation or proceeding conducted under authority” of Title IV. This is not the time or place to get into the particulars of that charge, but suffice it to say that the Respondent refused to furnish the Investigator with the names of potential witnesses and gave the Investigator evasive answers to some of the Investigator’s questions about the Respondent’s activities at General Convention, which are the subject matter of this proceeding. This is precisely what the Reference Panel warned the Respondent to guard against on October 1, 2024. Most importantly, these charges have nothing to do with the pending appeal to the Court of Review and its decision will not

affect them in any respect. This case centers around the Respondent's activities at General Convention and thereafter. The first case and pending appeal involve the Respondent's activities during the 2021-23 time period and during the course of the first case. There is no overlap between this case, on the one hand, and the first case and the pending appeal, on the other.

Conclusion

This matter has been pending for seven months. It has proceeded methodically and with due process for all parties. Whatever decision the Court of Review issues in the first case will not resolve the issues in this case. The Church Attorney therefore opposes the Stay Motion.

/s/ _____
Bradfute W. Davenport, Jr., Church Attorney
January 30, 2025

Certification

I certify that a copy of this Response to the Motion for Stay of Proceedings has been provided by email to The Rt. Rev'd Mark Bourlakas, The Rev'd Fran Gardner-Smith, Julian Bivins, Esquire, The Rev'd Dina Widlake, Marleen McCabe, The Rev'd Jeffrey Packard, Jack W. Burtch, Jr., Esquire, The Rt. Rev'd E. Mark Stevenson, J.P. Causey, Esquire, Thomas Hahn, Esquire and The Rev'd Edward O. Miller, Jr.