

**HEARING PANEL OF THE DISCIPLINARY BOARD  
OF THE EPISCOPAL CHURCH IN CONNECTICUT**

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**THE EPISCOPAL CHURCH IN  
CONNECTICUT,**

**v.**

**THE REVEREND AMJAD SAMUEL,**

**Respondent**

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**ECCT Title IV Matter No. 2021-1**

**RESPONSE OF THE RESPONDENT  
THE REVEREND AMJAD SAMUEL  
TO THE STATEMENT OF ALLEGED OFFENSES**

The Respondent, The Reverend Amjad Samuel, hereby responds to the Written Statement of Alleged Offenses prepared by the Church Attorney and dated February 2, 2022 in accordance with the provisions of Canon IV.13.2.(c).

**OBJECTION TO FORM OF THE  
CHURCH ATTORNEY'S WRITTEN  
STATEMENT OF ALLEGED OFFENSES**

1. Canon IV.12.1 provides in pertinent part that the Church Attorney shall prepare a written statement, "describing each alleged Offense separately, with reasonable particularity sufficient to apprise the Respondent of the acts, omissions or conditions which are the subject of the proceedings."

2. Canon IV.13.2 provides in pertinent part that "within 10 days of a referral for Hearing Panel proceedings, the Church Attorney shall provide to the Hearing Panel the statement of the

alleged offenses, updated as needed.”

3. The Church Attorney’s “Written Statement of Alleged Offenses” does not comply with the provisions of Canon IV.12.1 and Canon IV.13.2 in that neither “describ[es] each alleged Offense *separately*, nor does either “describe with *reasonable particularity* sufficient to apprise the Respondent of the acts, omissions or conditions which are the subject of the proceedings.”

(Emphasis Added)

4. Respondent objects to the inclusion of the “or” in the Second Charge of the Written Statement of the Church Attorney, as each charge is not set forth sufficient particularity sufficient to apprise the Respondent of the acts, omissions or conditions which are the subject of the allegation.

**AS TO THE FIRST CHARGE**  
Alleging Conduct Unbecoming a  
Member of the Clergy, Canon IV.4.1(h)(9)

1. Respondent denies that he engaged in any Conduct Unbecoming a Member of the Clergy, and therefore denies any violation of Canon IV.4.1(h)(9).

**AS TO THE SECOND CHARGE**  
Alleging Violation of Canon IV.3.1(e)

1. Respondent denies that he engaged in any act constituting discharging, demoting or otherwise retaliating against any person in violation of Canon IV.3.1(e).

2. Respondent denies that he engaged in [any] act[s] constituting discharging, demoting or otherwise retaliating against any person because any person opposed practices forbidden under Title IV of the Canons of the Episcopal Church.

3. Respondent denies that he engaged in [any] act[s] constituting discharging, demoting or otherwise retaliating against any person because any person reported information concerning an Offense under Title IV in violation of Canon IV.3.1(e).

**RESPONSE OF THE RESPONDENT  
TO THE STATEMENT OF ALLEGED FACTS**

1. The Statement of Alleged Facts drafted by the Church Attorney, the allegations regarding the staff at St. Paul's is false and misleading, and it does not provide any facts which would constitute a canonical offense.

2. The first Parish Administrator during Respondent tenure was hired by Respondent's predecessor at St. Paul's in 2014. She left St. Paul's because she was turning 70 and wished to retire. She is not identified by name in the Alleged Statement of Facts prepared by the Church Attorney. She had advised Respondent of her decision to retire six months in advance. She never indicated to Respondent that she had any issues with Respondent, and her tenure as parish administrator and her retirement were amicable. She never stated to Respondent or to the St. Paul's personnel committee that she had experienced a hostile or intimidating environment created or fostered by Respondent, and she was not identified as a Complainant by the Church Attorney.

3. The second Parish Administrator who served as Parish Administrator at St. Paul's during Respondent's tenure as Rector was not identified by name in the Alleged Statement of Facts prepared by the Church Attorney. She had performance issues which were evaluated by the members of the St. Paul's parish personnel committee. She communicated to that committee that she had recently retired from her previous job, and voluntarily left her role as Parish Administrator after deciding that

she needed to spend more of her time with her grandchildren and family. She never stated to Respondent or to the St. Paul's personnel committee that she had experienced a hostile or intimidating environment created or fostered by Respondent, and she was not identified as a Complainant by the Church Attorney.

4. The Director of Christian Education was not identified by name in the Alleged Statement of Facts prepared by the Church Attorney. She spent an overwhelming majority of her time planning a 6-day summer Vacation Bible School, and neglected the Sunday programming for which she was hired. At the time she left St. Paul's, she was looking for a job that would pay more as her second child had begun college. She never stated to Respondent or to the St. Paul's personnel committee that she had experienced a hostile or intimidating environment created or fostered by Respondent, and she was not identified as a Complainant by the Church Attorney.

5. The Choir Director was not identified by name in the Alleged Statement of Facts prepared by the Church Attorney. She was contracted to lead both the senior and junior choirs. She refused evaluation of her work and to lead the junior choir. She never stated to Respondent or to the St. Paul's personnel committee that she had experienced a hostile or intimidating environment created or fostered by Respondent, and she was not identified as a Complainant by the Church Attorney.

6. The organist mentioned was not identified by name in the Alleged Statement of Facts prepared by the Church Attorney. He was only hired as an interim, and he did not show up for over a month. The Parish leadership finally decided that he was not able to offer the music program needed during COVID-19. never stated to Respondent or to the St. Paul's personnel committee that he had experienced a hostile or intimidating environment created or fostered by Respondent, and he

was not identified as a Complainant by the Church Attorney.

7. Respondent denies that he is either unable or unwilling to tolerate dissent at St. Paul's. Parishioners, employees and vestry members and/or officers who disagree with Respondent are not ostracized by him.

8. Respondent acknowledges that several years ago, five women complained to the diocese that Respondent "did not like women," but that was solely because he was originally from Pakistan. That allegation was both racist and false, and none of those five women is identified by the Church Attorney as a Complainant. Neither of the two Bishops serving the diocese filed or pursued a Title IV proceeding based upon that false allegation, notwithstanding a canonical obligation to do so under Canon IV.1(f) had either Bishop concluded that Respondent's actions "may have constitute[d] an Offense as defined in Canon IV.2 meeting the standards of Canon IV.3.3."

9. Unfortunately, on multiple occasions, in his life, Respondent has been subjected to racially demeaning behavior, including false statements that have been made concerning him that have focused on his race and national origin although neither is a problem. That is simply wrong, but such statements as hurtful as they are, have not affected Respondent's ministry to all of the people of St. Paul's.

10. Respondent denies that he behaves in a manner that divides the Parish, or that he has created an environment at St. Paul's that is divisive. It is alleged that Respondent engages in behavior that divides the Parish. On the contrary, Respondent offers welcome to anyone who walks into the church regardless of their age, race, sexual orientation, or gender identity. Respondent encourages and affirms structures that offer fairness to everyone equally. The result of which is that

today both senior and junior wardens are women, two out of five officers are immigrant people who were not born in the USA, and the leadership of the parish is balanced between age, gender, race, and duration of affiliation with St. Paul's. The parish today has almost three hundred and fifty thousand dollars in cash in the bank and the rectory mortgage has been paid off, in stark contrast to a large debt and not having enough funds to cover its liabilities when Respondent first arrived. Decisions are made by appropriate forum, boundaries are expected to be respected, and all parish matters are transparently communicated, in contrast to the culture of backroom deals that existed when Respondent first arrived in 2014.

11. Respondent denies that his pastoral care is biased in any way. He has been available to everyone, regardless of their view of him, his ministry, or even their denial to Respondent of basic respect and human dignity.

12. Respondent denies that he has retaliated, directly or indirectly or through others, against anyone who complained about his behavior. He has never been hostile or intimidating, and the use of those terms by the Church Attorney are demeaning and false. Respondent always tries to encourage people to imagine, bring new ideas, and offer creative options. The allegation that Respondent is unable or unwilling to tolerate dissent is absolutely false. The Vestry decisions and the processes are followed by the Respondent, regardless of his personal opinion.

Faithfully submitted,

A handwritten signature in blue ink, appearing to be 'Amjad J. Samuel', written over a horizontal line.

The Reverend Amjad J. Samuel  
Respondent

Dated: February 23, 2022