

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

**THE EPISCOPAL CHURCH IN
CONNECTICUT**

V

a
THE REVEREND AMJAD SAMUEL

Canons

RESPONDENT

} Respondent's Motion for the Hearing Panel to enter
} an Order Dismissing This Title IV Matter entirely
} based upon the irreparable harm caused to
} Respondent by the multiple Canonical Violations
} Committed at every single stage of the Title IV
} process making it impossible for Respondent to get
} fair Hearing; or alternatively returning this Title IV
} Matter to the Intake stage to have a proper
} investigator appointed in Accordance with the
} Canons with new Panels and without interference by
} Bishop Ian Douglas and/or Robin Hammeal-Urban;
} If the foregoing is not granted then Respondent
} Seeks an Order to Compel Church Attorney
} to Produce the Required Mandatory Disclosures
} Pursuant to Canon IV.13.5a and for the Hearing
} Panel President to Sign and Enter the Revised
} Scheduling Plan and Discovery Order Submitted
} Jointly by Respondent's Counsel and the Church
} Attorney on October 14, 2022

ECCT Title IV Matter 2021-1

The Respondent, The Reverend Amjad J. Samuel, through his counsel, Michael F. Rehill, makes this Motion to the Hearing Panel for an Order Dismissing this Title IV Matter in its entirety based upon the irreparable harm caused to Respondent by the multiple Canonical violations committed at every stage of the Title IV process making it impossible for Respondent to get a fair Hearing ; or alternatively, returning this Title IV Matter to the Intake stage to have a proper investigator appointed in accordance with the Canons with new Panels and without interference and influence by Bishop Ian Douglas and Robin Hammeal-Urban. If the foregoing is not granted then Respondent seeks an Order to Compel the Church Attorney to produce the required Mandatory Disclosures pursuant to Canon IV.13.5a and for the Hearing Panel President

to sign and enter the revised Scheduling Plan and Discovery Order submitted jointly by the Respondent's Counsel and Church Attorney on October 14, 2022, to the Rev. Joseph Shepley.

The Respondent, Rev. Amjad J. Samuel is the Rector of St. Paul's Episcopal Church in Shelton Connecticut. He is the first Priest of color to be Rector at St. Paul's. Fr. Samuel studied in the United States in the 1990's but then returned to his birth Country of Pakistan. However, in 2006 Fr. Samuel had to leave Pakistan to practice his faith freely and was Ordained a Priest in 2009. As a Priest of color, Father Samuel works hard to welcome diversity and invites all voices to be heard. He has encouraged that same welcoming of diversity at St. Paul's and people of color, and those of other diverse backgrounds in the congregation have felt welcomed and encouraged to join in leadership positions. However, there have been people, like at all congregations who prefer not to embrace change and would rather continue as though the changing world and demographics around them does not exist. Every new Rector experiences "growing pains" when arriving to a new cure. Change in one way or another is inevitable. Fr. Samuel acknowledges that sometimes change is hard, especially when a new Rector comes in and he, she or they look different than the prior faces who had been serving at the Altar. Father Samuel is not so naïve as to not realize that there were some who did not wish to see his brown face at the Altar, no matter how much he smiled and unfortunately, the fact that he was from Pakistan was not warming the hearts of some parishioners who could not hide their reactions to seeing him.

The Episcopal Diocese of Connecticut has an Employee Practices and Policies Handbook. Which states, "Equal Opportunity and Commitment to Diversity" on page three. Additionally on page 3 there are sections titled, Nondiscrimination and Affirming Racial Healing, Justice, & Reconciliation.

Nondiscrimination: ECCT is committed to a work environment in which all individuals are treated with dignity and respect. ECCT recognizes and appreciates all of the differences among God's people remembering that all differences have been blessed by God.

Affirming Racial Healing, Justice and Reconciliation:

ECCT is committed to recognizing the reality of white supremacy and bias against people of color.

ECCT adopts from 2018 Annual Convention the resolution "that all searches for ECCT staff positions include at least two people of color, or one if there are fewer than four people in total, among the final candidates interviewed". (Exhibit 1 attached)

While these policies appear on their face to align with Respondent's philosophy on diversity and acknowledge that there is bias against people of color, in a meeting on September 9, 2021, behind closed doors with Respondent, Respondent's Counsel Michael F. Rehill, Respondent's Advisor, Dr. Pamela L. Lutz and Respondent's Wife, Maria Mitchell Bishop Ian Douglas and Ms. Hammeal-Urban admitted that the Complaints against the Respondent have some racial motivation behind them but have failed and refused to acknowledge it publicly or do anything about it.

Bishop Douglas and Robin Hammeal-Urban were told about Complainant Ron Kelly posting a "joke" on Facebook that was very offensive regarding Pakistani people and those suffering from depression and feeling suicidal. They were also informed that Cindy Savage, another one of the Complainants, involved in the Title IV matter "liked" this offensive material, as did Jayne Johnson who was part of the 2017-2018 allegations and involved in the Title IV Matter pending against the Respondent. It is disgusting that the Respondent gave this information to Bishop Douglas and Robin Hammeal-Urban and they both choose to be complicit regarding the overt racist behavior towards the Respondent by Complaints in this Title IV Matter. The fact that Bishop Douglas and Robin Hammeal-Urban think this type of behavior is

acceptable enough to have remained silent about it is quite telling. Perhaps they need to examine themselves for their own racial and mental health biases. (Exhibit 2 attached)

The Title IV process in the Diocese of Connecticut has a very heavy-handed feel to it. From the initial complaints, where Ms. Robin Hammeal-Urban immediately gets involved and the accused Priest is often met with a draft Accord without even being afforded the opportunity to see an investigator's Report or have a copy of the Intake Officer's Report to examine outside of the control of the Diocese. Instead, a member of the clergy is pressured and given short deadlines to take the Accord or risk having a matter referred to a Hearing Panel.

That process and heavy-handedness happened with Father Samuel in this Title IV Matter just as it has happened to others before him. In Father Samuel's case, knowing that he did not commit any canonical offense, he did not buckle under the heavy pressure from Bishop Ian Douglas and Ms. Hammeal-Urban. Although Father Samuel is not afraid of the truth, he knew that his standing up for himself would not be easy. It turns out he was right. The Canons of the Episcopal Church exist for a reason. Unfortunately, in this Title IV Matter, from the very beginning, there have been multiple canonical violations from the Bishop's Office trickling down to the improper appointment of the "investigator" to the Church Attorney, to all of the Panels improper interaction with witnesses in this matter to convey information to the Church Attorney, Respondent, Respondent's Counsel and Respondent's Advisor as well as others on their behalf.

Canonical Violations

CANON IV.2 of the Canons of the Episcopal Church:

Investigator shall mean a person having (a) sufficient knowledge, skill, experience, and training to conduct investigations under this Title and (b) familiarity with the provisions and objectives of this Title. Investigators shall be appointed by the Bishop Diocesan in consultation with the president of the Disciplinary Board. The Investigator acts under the direction of the Reference

Panel until a referral is made pursuant to [Canon IV.11.3](#); after such referral, the Investigator shall be overseen by and report to the Church Attorney.

Canon VIII.2.E of the Canons of the Episcopal Church in Connecticut:

E) Investigator. The Bishop shall appoint an Investigator in consultation with the Standing Committee. The Investigator may but need not be a Member of the Church. The Bishop may terminate the term of the Investigator with the advice and consent of the Standing Committee. The Diocese may compensate an Investigator for services rendered at the rate described in a written retainer agreement. Whether or not an Investigator is compensated, the Diocese shall reimburse an Investigator for reasonable and necessary expenses incurred in a proceeding under this Canon.

On June 18, 2021, Donald J. Allison sent an email to Michael F. Rehill stating:

Dear Michael,

I am the Church Attorney for the Episcopal Diocese in Connecticut (the “Diocese”). The Reference Panel of the Diocese has referred to me for investigation complaints made against Rev. Samuel under Title IV of the Constitution and Canons of the Episcopal Church. Bishop Douglas has referred to me your May 13, 2021 letter advising him that you have been retained to act as counsel for Rev. Samuel in this matter. I am writing to schedule an interview with Rev. Samuel. I am copying James Allison, the investigator in this matter (who is also an attorney and my son). Please let me know yours and your client’s availability.

I look forward to hearing from you.

Best ,Don (Exhibit 3 attached)

Violation Canon IV.2. Bishop Douglas violated Canon IV.2 hereinabove by not appointing a proper investigator in consultation with the President of the Disciplinary Board

Violation Canon VIII.2.E. Bishop Douglas violated Canon VIII.2.E and did not appoint an Investigator in consultation with the Standing Committee, but even if he did, this provision in the Canons of the Episcopal Diocese in Connecticut are contrary to the Canons of the Episcopal Church.

Canon IV.19.14.b of the Canons of the Episcopal Church

b. The Church Attorney or any member of any Panel provided for in this Title shall disqualify himself or herself in any proceeding in which such person's impartiality may reasonably be questioned. The person shall also disqualify himself or herself when the person, the person's spouse, any person within the third degree of relationship to either of them, or the spouse of such person, (1) is the Respondent, Complainant or an Injured Person, (2) is likely to be a witness in the proceeding, (3) has a personal bias or prejudice concerning the Respondent, Complainant or any Injured Person, (4) has personal knowledge of disputed evidentiary facts concerning the proceeding, (5) has a personal financial interest in the outcome of the proceeding or in the Respondent, Complainant, any Injured Person or any other interest that could be substantially affected by the outcome or (6) is a member of the same congregation or otherwise has a close

personal or professional relationship with the Respondent, the Complainant, any Injured Person or any witness in the matter.

Violation Canon IV.19.14.b(2) and Canon IV.19.14.b(5) were violated in this matter because by the Church Attorney selecting his son in this matter and moving this matter forward, the Investigator is likely to be a witness in this matter and obviously a father and son would both encourage moving forward where they are both likely to benefit financially from moving a matter forward and keeping it going.

Canon IV.6. of the Canons of the Episcopal Church

Sec. 3. Any person other than the Intake Officer who receives information regarding an Offense shall promptly forward the information to the Intake Officer. A Bishop Diocesan shall forward information to the Intake Officer whenever the Bishop Diocesan believes that the information may indicate conduct constituting one or more Offenses.

Violation Canon IV.6.3. was violated in this Matter if this happened in this matter then the Church Attorney has withheld more Mandatory Disclosures from the Respondent and Respondent's Counsel. Any documentation in the possession of the Intake Officer would fall under the category of Mandatory Disclosures.

Sec. 7. If the Intake Officer determines that the information, if true, would constitute an Offense, the Intake Officer shall promptly forward the intake report to the Reference Panel. The president shall promptly select from the Disciplinary Board, a Conference Panel and a Hearing Panel, and shall designate a president of each Panel. At the same time as forwarding the intake report to the Reference Panel, the Intake Officer shall send a notice to the subject Member of the Clergy informing him or her of the nature of the alleged Offense(s), the identity of any persons who have been designated as Complainants, and describing the next procedural steps that the Member of the Clergy can anticipate. The notice shall also remind the Member of the Clergy of his or her duty under [Canon IV.3.1\(b\)](#) to cooperate in the subsequent proceedings.

Violation Canon IV.6.7 was violated in this matter because of the secrecy and Bishop Douglas and Ms. Hammeal-Urban withholding of the names of the people on the Conference Panel and the Hearing Panel, Respondent and Respondent's Counsel have to assume that these Panel's were improperly seated, and Respondent was denied the opportunity to timely challenge those chosen.

Sec. 10. If the determination of the Reference Panel is to take no action other than an appropriate pastoral response, the Panel shall notify the Complainant and the subject Member of the Clergy of the determination and the basis for the determination to take no action other than an appropriate pastoral response. If the referral is to conciliation, the provisions of [Canon IV.10](#) shall apply. If the referral is to investigation, the provisions of [Canon IV.11](#) shall apply. If the referral is to the Bishop Diocesan for possible Agreement and an Agreement is not reached within 90 days of the referral, the Reference Panel will re-refer the matter, in accordance with [Canon IV.6.9](#).

Violation Canon IV.6.10 was violated in this case, based upon the Church Attorney's email (Exhibit 1) it appears that there was some violation of the Canons at the Reference Panel Stage

where Mr. Allison states that the Reference Panel referred it to him, as the Church Attorney for investigation. What should have happened instead is:

“If the referral is to investigation, the provisions of [Canon IV.11](#) shall apply.”

Canon IV.11 of the Canons of the Episcopal Church:

Canon 11: Of Investigations

Investigators. **Sec. 1.** In each Diocese there shall be one or more Investigators.

Sec. 2. Upon referral of an intake report, the Investigator shall investigate all facts pertinent to the factual claims of the intake report. The Investigator shall use appropriate investigative means, with due consideration to pastoral sensitivities, and shall complete the investigation as expeditiously as possible.

Report to the Reference Panel **Sec. 3.** The Investigator shall present the findings of the investigation in writing to the Reference Panel. The Reference Panel may meet with the Investigator and shall consider the report to determine whether to: (a) take no action other than appropriate pastoral responses pursuant to [Canon IV.8](#); (b) refer the matter to the Bishop Diocesan for consideration of proceedings under [Canon IV.9](#); (c) refer the matter to conciliation pursuant to [Canon IV.10](#); (d) require further investigation; or (e) refer the matter to the Conference Panel pursuant to [Canon IV.12](#), or to the Hearing Panel pursuant to [Canon IV.13](#). The determination shall be approved by a majority vote of the Reference Panel.

Sec. 4. If the determination is to refer for further investigation, the Investigator shall make such further investigation as the Reference Panel directs and shall submit a supplemental report of findings to the Reference Panel. The Reference Panel shall then reconvene and proceed as provided in [Canon IV.11.3](#).

Sec. 5. All investigations shall be confidential until such time as information obtained may be utilized by the Church Attorney, the Bishop Diocesan or the Panels. All persons, prior to being interviewed by the investigator, shall be advised of the confidential nature of the investigation and when such information may be shared during the course of the proceedings.

Violation Canons IV.11.2. IV.11.3. and IV.11.5. Were all violated in this matter as the Investigator did not write an Investigator’s Report. The Investigator was always connected to his father the Church Attorney. The Investigator did not report to the Reference, nor was the investigator under the direction of the Reference Panel until the Matter was referred to the Conference Panel.

Canon IV.19.11 Improper Influence

Sec. 11. No person subject to the authority of the Church may attempt to coerce or improperly influence, directly or indirectly, the actions of any body performing functions under this Title, or any member of such body or any other person involved in such proceedings.

Violation Canon IV.19.11 Was violated in this matter because any reasonable person would think that a father who is an experienced Church Attorney would be able to influence his son.

And, in fact, that did happen because the Son who was listed as the Investigator did not fulfill his obligations under the title of investigator.

Violation Canon IV.19.11. by Robin Hammeal-Urban because she improperly inserted herself into the Reference Panel process.

Canon IV.2

Reference Panel shall mean a panel composed of the Intake Officer, the Bishop Diocesan and the president of the Disciplinary Board to serve as the body which performs the duties prescribed in Canons [IV.6](#) and [IV.11](#).

Violation Canon IV.2. Regarding Reference Panels was violated in this matter because Ms. Robin Hammeal-Urban improperly attended and inserted herself in the Reference Panel which by Canon she was not a member, nor could she be a member.

Canon 3: Of Accountability

Causes for proceedings. **Sec. 1.** A Member of the Clergy shall be subject to proceedings under this Title for:

- a. knowingly violating or attempting to violate, directly or through the acts of another person, the Constitution or Canons of the Church or of any Diocese;
- c. intentionally and maliciously bringing a false accusation or knowingly providing false testimony or false evidence in any investigation or proceeding under this Title;

Violation Canons IV.3.1.a and IV.3.1.c were violated in the matter because Bishop Ian Douglas knew that a lot of what Ms. Hammeal-Urban was writing and doing on his behalf such as withholding information and the Intake Report from the Respondent. In fact, often Bishop Douglas would allow Ms. Hammeal-Urban to send emails and do his dirty work for him perhaps thinking that the Canons do not apply to her, however, Bishop Douglas is still subject to the Canons if someone is acting on his behalf. Furthermore, Bishop Douglas knew that there was no investigator's report by the investigator (a canonical offense in itself) and yet he allowed this Title IV Matter to progress to the next level when the Respondent refused to enter into the Accord that he and Ms. Hammeal-Urban put forth under threat of going to the Hearing Panel.

Canon IV.6.9 of the Canons of the Episcopal Church

Sec. 9. The Reference Panel shall monitor the progress of each referral on a monthly basis to ensure that the matter is progressing in a timely fashion. Until such time as the matter is referred to a Hearing Panel, if the Reference Panel determines that the matter has reached an impasse or is not progressing in a timely fashion, it may re-refer the matter. Once a matter is referred to a Hearing Panel, [Canon IV.15.1](#) shall govern any issue regarding the progress of the matter. The Intake Officer shall report at least monthly to the Respondent, the Respondent's Advisor, the Respondent's Counsel, if any, the Complainant, the Complainant's Advisor and the Complainant's Counsel, if any, on the progress in the matter.

Violation Canon IV.6.9 was violated because the Respondent, the Respondent's and the Respondent's Advisor never received any updates from the Intake Officer in this Title IV Matter as required by Canon.

Canon IV.19.16

Sec. 16. There shall be a presumption that the Respondent did not commit the Offense. The standard of proof required for a Hearing Panel to find an Offense by a Respondent shall be that of clear and convincing evidence.

Violation: Canon IV.19.16 was violated by Bishop Douglas at the September 30, 2021, meeting with the Parish of St. Paul's Episcopal Church where the Respondent is the Rector, Bishop Ian Douglas informed the Congregation that the Respondent is presumed guilty which is directly contrary to the Canons.

Canon IV.5.3.g. **The Disciplinary Board shall appoint a clerk** who may be a member of the Board, who shall be custodian of all records and files of the Disciplinary Board and who shall provide administrative services as needed for the functioning of the Board. The clerk, or an assistant clerk who may be appointed at the discretion of the Board, may be any person otherwise qualified who has no conflict of interest in the matter before the Board and who is not barred from serving on the Disciplinary Board under the provisions of [IV.5.3\(c\)](#) or serving on the staff of persons so barred.

Violation: Canon IV.5.3.g. was violated by Robin Hammeal-Urban who was acting as a "clerk" to the Reference Panel, The Conference Panel, and the Hearing Panel in this Matter. It was also violated by Any Clergy on the Reference Panel, The Rev. Jack Gilpin, The Rev. Joseph Shepley and Bishop Ian Douglas.

Canon VIII.1.A.iv. in the Canons of the Episcopal Diocese of Connecticut. **Employees of the Diocese**, current members of the Standing Committee, those individuals specified in the first sentence of Canon IV.5.3(c) of the Church Canons and **any persons affiliated in the practice of law** or otherwise with any of those individuals are ineligible to serve as a member of the Board. Persons who will be eligible to serve on the Board on the date on which their term would commence, may be nominated for and may be elected to the Board even if they would not be eligible to serve on the Board at the time of their nomination or election.

Violation: Canon VIII.1.A.iv. was violated by Robin Hammeal-Urban who was acting as a "clerk" to the Reference Panel, The Conference Panel, and the Hearing Panel in this Matter. It was also violated by Any Clergy on the Reference Panel, The Rev. Jack Gilpin, The Rev. Joseph Shepley and Bishop Ian Douglas.

OTHER MISCONDUCT OF ROBIN HAMMEAL-URBAN And BISHOP IAN DOUGLAS

Email dated, July 28, 2021, at 9:43pm from Robin Hammeal-Urban to Amjad, thanking him for cooperating with the investigation and stating “When the Reference Panel last met they reviewed the investigation report...” Ms. Hammeal-Urban is not a member of the Reference Panel, as defined in Canon IV.2 “Reference Panel shall mean a panel composed of the Intake Officer, the Bishop Diocesan and the president of the Disciplinary Board to serve as the body which performs the duties prescribed in Canons IV.6 and IV.11.” It should be noted that Ms. Hammeal-Urban has inserted herself either directly or indirectly as diocesan employee of Bishop Ian Douglas. (Exhibit 4 attached)

Misconduct: Ms. Hammeal-Urban knew all along that there was no investigator’s report. She is intentionally misrepresenting information to the Respondent.

Email dated, July 30, 2021, at 10:58am from Michael F. Rehill, Counsel to the Rev. Amjad J. Samuel to Robin Hammeal-Urban stating, “...please advise the Bishop that we would like to have copies of both the investigator’s report...” (Exhibit 5 attached)

Email dated, August 3, 2021, at 2:57pm from Robin Hammeal-Urban to Michael F. Rehill, Counsel to the Rev. Amjad J. Samuel, stating, “While I appreciate your desire to have the investigative report, Bishop Ian will not be providing the Respondent with that Report. According to the Canons, the Respondent is not entitled to the Report. The canons (Canon IV.11.5), provide that investigations are confidential “until such time as information obtained may be utilized by the Church Attorney, the Bishop Diocesan or the Panels”. I appreciate your desire to have this report and assure you that Bishop Ian and I can set the context for the proposed terms of an Accord when we meet.” (Exhibit 6 attached)

Misconduct: This is not true as shown in the Email from Robin Hammeal-Urban dated, July 28, 2021, where she stated that the Reference Panel met and reviewed the “investigation” report. Therefore, Bishop Douglas was improperly withholding the report from Respondent and his Counsel.

Misconduct also applies to Bishop Ian Douglas who is guilty of violating the Canon IV.3.1.a. and IV.3.1.c (see in Canonical Violations hereinabove).

Email dated, September 2, 2021, at 9:46pm from Robin Hammeal-Urban to Amjad, “As you may recall, in very general terms the Disciplinary Action Intake report identified concerns regarding: Your role in the relationship with the Christian Counseling Center (CCC), oversight of Parish Finances, and treatment of people/parishioners who disagree with you. The Investigator’s report...” (Exhibit 7 attached)

Misconduct: Ms. Hammeal-Urban has once again falsely referenced an “Investigator’s report” which we know does not exist as the investigator did not draft an investigator’s report. Additionally, Ms. Hammeal-Urban went on to falsely write, “In light of this, the Reference

Panel on July 13, 2021, referred the matter to the Bishop for possible agreement regarding Discipline...”

Letter to Bishop Ian Douglas dated, September 3, 2021, from Michael F. Rehill, Counsel to the Rev. Amjad J. Samuel stating ...” In light of the utilization of the investigator’s report by the Bishop and the Reference Panel, under Canon IV.11.5, the investigation is no longer confidential. Accordingly, it is respectfully requested that I be provided with a copy of the investigator’s report prior to the September 9, 2021, meeting, and I request that the meeting be delayed until after I have been provided with both the Intake Report and the Investigator’s Report.” (Exhibit 8 attached)

Email dated September 5, 2021, at 2:56pm, Bishop Douglas to Michael F. Rehill, in response to the September 3, 2021, letter written by Michael F. Rehill to Bishop Douglas. The Bishop responded stating, “I am writing in receipt of your correspondence from last Friday regarding the Disciplinary actions with the Rev. Amjad Samuel. Per our practice in the Episcopal Church in Connecticut, communications regarding pending Title IV matters are handled by Robin Hammeal-Urban, our Pastoral Response and Discipline Resource Office[r]. You can expect to hear from Ms. Hammeal-Urban in the not too distant future.” (Exhibit 9 attached)

Misconduct of Bishop Douglas as described in Canon Violations hereinabove by using Robin Hammeal-Urban to do his dirty work: Unfortunately, this was just another attempt to deflect rather than fulfill his role and responsibilities as Bishop Diocesan. Instead, the Bishop created a non-canonical role and without any authority created a position called “Discipline Resource Officer.” That title and position are not found in either the Canons of the Episcopal Church or The Canons of the Diocese of Connecticut. The Bishop cannot neglect his duties and fail to cooperate with the Title IV process even when it makes him uncomfortable because he is improperly withholding documentation and reports that Respondent is entitled to under Canon IV.11.5.

Email dated September 5, 2021, at 9:13pm, Ms. Hammeal-Urban did write to Michael F. Rehill Counsel to the Rev. Amjad J. Samuel stating, “You, Rev. Samuel and Rev. Samuel’s Advisors can have access to the Disciplinary Action Intake Report before our 3:00pm meeting by arriving at 2:00pm (or a bit earlier if you desire). You will be provided with hard copies of the Intake Report for your review and have exclusive use of the conference room during this time. At the conclusion of our 3:00 meeting, the copies of the Intake Reports will be collected. At this stage of the proceedings, we do not provide copies of the Intake Report to anyone other than the members of the Reference Panel. Respondents, their counsel, and Advisors are given the opportunity to read the report. No copies, scans or photos of the Intake Report are permitted.” (Exhibit 10 attached)

Misconduct: Ms. Hammeal-Urban who is not subject to the Canons but is however, acting on behalf of Bishop Douglas who is subject to the Canons of the Episcopal Church, is yet again withholding documentation and Reports from the Respondent and being extremely heavy handed especially since she and the Bishop are expecting the Respondent to make a decision on an Accord after viewing an Intake Officer’s Report for approximately an hour. It should be noted that Ms. Hammeal-Urban and the Bishop as well as others have had unlimited access to

these documents. It is of note that Ms. Hammeal-Urban states in her email “we do not provide copies of the Intake Report to anyone other than the members of the Reference Panel.” Once again, Ms. Hammeal-Urban is being dishonest because she is not a member of the Reference Panel as defined in the Canon IV.2. Likewise, the Church Attorney is not a member of the Reference Panel and it is presumed that Mr. Allison had copies of the Intake Report because he had already interviewed the Respondent prior to this meeting. The blatant lies and misrepresentations that Ms. Hammeal-Urban repeatedly uses casts a stain on the Title IV process as she and Bishop Douglas’ dictatorship in the Episcopal Diocese of Connecticut is anything but Christian. Ms. Hammeal-Urban was giving the Respondent, his Counsel and advisor an hour to “read” the Intake Officer’s report, prior to attempting to shove an Accord down the Respondent’s throat through coercion and threat of further proceedings. Ms. Hammeal-Urban’s conduct as demonstrated in her own words throughout her emails is shameful.

In a further attempt to deny Rev. Samuel his rights under Title IV, Ms. Hammeal-Urban continued in her email, incredibly stating,

“Though the Investigator’s Report is no longer considered confidential pursuant to Canon IV.11.5, this does not mean that the Respondent or anyone else beyond the Reference Panel can obtain access to the copies of that report. A lack of confidentiality does not equate to the ability to disseminate copies of the Investigator’s Report. We will not share copies of the Investigator’s Report at this time.” (Exhibit 10 attached)

Misconduct: Once again, Ms. Hammeal-Urban is not being honest as she is not a member of the Reference Panel and yet she had access to that which she is denying Respondent without canonical authority, but obviously acting on behalf of Bishop Ian Douglas, was falsely stating that Respondent was not entitled to a report that was no longer confidential.

Ms. Hammeal-Urban continued in her letter stating, “The Reference Panel does have the canonical authority to refer this matter directly to a Hearing Panel pursuant to Canon IV.11.3, as the Reference Panel has already received the report from the investigator.” (Exhibit 10 attached)

Misconduct: More lies and a threat to Respondent in her email to his Counsel by stating that the “Reference Panel can refer the Matter directly to a Hearing panel because it already has received the Report from the Investigator.” There was never an investigator’s report, and the investigator did not give his nonexistent report to the Reference Panel. Therefore, this matter was improperly passed on to the Conference Panel.

I am sure Ms. Hammeal-Urban never thought that her lies, misrepresentations and threats would ever be exposed. In addition, Ms. Hammeal-Urban in her threat to deny Respondent his due process under the Canons was exhibiting the same racial bias that is used in the secular courts to get young black and brown men to plead guilty to crimes they did not commit under the threat of increased incarceration and punishment.

Letter dated September 14, 2021, from Michael F. Rehill to Bishop Douglas and canon Hammeal-Urban responding to the meeting that was held on September 9, 2021, with the Respondent, his counsel, Michael F. Rehill, his advisor, Pamela L. Lutz, Respondent’s wife,

Maria Mitchell, Bishop Douglas, and Robin Hammeal-Urban. This letter addresses several very serious concerns as well as canonical violations by Bishop Douglas. I wrote, “We have requested a copy of the investigator’s report, which is no longer confidential under Canon IV.11.5, but you have not yet provided it.”

Quoting Robin Hammeal-Urban’s language in her letter dated, September 5, 2021, “Though the Investigator’s Report is no longer considered confidential pursuant to Canon IV.11.5, this does not mean that the Respondent or anyone else beyond the Reference Panel can obtain access to the copies of that report. A lack of confidentiality does not equate to the ability to disseminate copies of the Investigator’s Report. We will not share copies of the Investigator’s Report at this time.”

In my letter I write, “I must most respectfully disagree. The lack of confidentiality does equate to the ability to disseminate copies of the Investigator’s report to Respondent and to his counsel and his Advisor, and we must reiterate our request for same in order to intelligently advise Respondent regarding your proposed submission to discipline. You have requested that the Respondent resign from his cure without providing any factual basis for any of the allegations made by any of the identified complainants or any of the anonymous “reporters.” The Respondent denies that he has committed any canonical offense, and he does not understand why he should resign from his position as Rector of St. Paul’s or enter into an Accord or any other “Submission to discipline.”

My letter goes on to state, “Finally, I am concerned that Ms. Hammeal-Urban states that,

“The Reference Panel meets that afternoon [September 14] and has indicated that if there is no agreement to the terms of an Accord, they will likely refer the matter to a Hearing Panel.”

It is respectfully submitted that if the matter is not summarily dismissed based upon the investigator’s report, it should be referred to the Conference Panel pursuant to canon IV.12.

Father Samuel should not be denied access to the Conference Panel and only after a meeting with the Conference Panel should the matter be referred to a Hearing Panel, and then only if the Conference Panel concludes that would be appropriate. Under the circumstances, referring this matter directly to the Hearing Panel rather than referring it to a Conference Panel would constitute denying Respondent of due process under the Canons.

Therefore, the Respondent must most respectfully decline your offer at this time.

In order for the Respondent to consider your proposal, we must be provided with a copy of the Investigator’s Report; the charges prepared by the Church Attorney; the names of the members of the Hearing Panel; and referral to the Conference Panel pursuant to the provisions of Canon IV.12.” (Exhibit 11 attached)

Misconduct: At the time of the September 9, 2021, meeting, Respondent, his Counsel and his Advisor had no idea that there was no Investigator’s Report as required by Canon because

Bishop Ian Douglas and Ms. Hammeal-Urban had continued to repeatedly lie about same during the meeting.

Misconduct: When I, as Respondent's Counsel, questioned Bishop Douglas as to why Respondent and I could not have a copy of the Investigator's Report, Bishop Douglas lied and said, "The Investigator believes it's his right to keep the report for the reference panel."

Misconduct: Robin Hammeal-Urban and Bishop Douglas both knew that the Investigator in the matter did not write a report. Bishop Douglas was on the Reference Panel and Ms. Hammeal-Urban attended and communicated with the Reference Panel. She also knew that there was no Investigator's Report. Ms. Hammeal-Urban did not correct Bishop Douglas's lie. There was even discussion by Bishop Douglas as to who owned the Investigator's Report. To which I informed him that the Diocese owned the Report because they paid for it. Little did I know at that time that the entire conversation about an Investigator's Report was a fiction, but both Bishop Douglas and Robin Hammeal-Urban knew.

How ironic that we were at a meeting where Bishop Douglas and Robin Hammeal-Urban were attempting to coerce Respondent into signing an Accord with little to no information, as they both looked us all in the eye and lied.

During this September 9, 2021, meeting Ms. Hammel-Urban and Bishop Douglas attempted to further deny Rev. Samuel his rights under the canons, by attempting to bypass the Conference Panel and force Respondent to face a Hearing Panel if he did not enter into the Accord that they presented. Respondent's Advisor Dr. Lutz questioned Bishop Douglas and Robin Hammeal-Urban as to why they were trying to emulate the racial biases of the secular courts and deny a person of color access to due process under the Canons? She pointed out to Bishop Douglas that so often people of color are not given the same rights and remedies as their white colleagues.

Finally, after much discussion, and defensiveness on the part of Bishop Douglas, he claimed he would take the request for a Conference Panel back to the Reference Panel for them to consider.

Email dated September 15, 2021, from Robin Hammeal-Urban to Michael F. Rehill Counsel to the Rev. Amjad J. Samuel stating, "I am writing to update you on the action taken by the Reference Panel on September 15, 2021. Bishop Ian Douglas conveyed your concerns regarding proceeding directly to a Hearing Panel. The Reference Panel voted to refer this matter to a conference Panel." (Exhibit 12 attached)

Misconduct: How does Ms. Hammeal-Urban know what happened at the Reference Panel? She is not a member of the Reference Panel, she has no canonical role in this process, and yet she seems to know exactly what went on with the Reference Panel. Why is Ms. Hammeal-Urban writing to "Update" anyone on the action of the Reference Panel? As per Canon IV.6.9 that responsibility belongs to the Intake Officer.

Email dated September 15, 2021, at 8:33pm from Michael F. Rehill, Counsel to the Rev. Amjad J. Samuel to Robin Hammeal-Urban stating, "Can you provide the names of the members of the Conference Panel and the Hearing Panel?" (Exhibit 13 attached)

This was a reasonable question because the Panels had to already have been selected by the President of the Disciplinary Board.

Email dated September 23, 2021, at 4:30pm, from Robin Hammeal-Urban to Michael F. Rehill Counsel to the Rev. Amjad J. Samuel stating,

“The names of the Conference Panel members are The Rev. Jack Gilpin, who is designated as president, and Mr. John Baldwin.

“At this time it is premature to release the names of the Hearing panel members assigned to this matter.” (Exhibit 14 attached)

Misconduct: Ms. Hammeal-Urban is withholding information from the Respondent and his Counsel. Why has Ms. Hammeal-Urban sought to control and manipulate the flow of basic information. The Respondent has the right to know who is on each panel to prepare for any possible conflicts. More importantly, why does Ms. Hammeal-Urban, a witness in this matter have insider information on each Panel when she is not a member of the Disciplinary Board?

Email dated September 21, 2021, at 2:34pm from Robin Hammeal-Urban to Pat Sullivan and Rev. Amjad J. Samuel stating, “I am writing on behalf of Bishop Ian Douglas who would like an opportunity to meet with the vestry and the congregation of St. Paul’s Church on Thursday, September 30. The purpose of these conversations is[to] provide the vestry and congregation with timely information regarding leadership at St. Paul’s Church and to provide space to share questions and concerns.

I will join Bishop Ian in these conversations.” (Exhibit 15 attached)

When Senior Warden Pat Sullivan wrote to Ms. Hammeal-Urban and requested an agenda for the Vestry and Parish Meetings, she received the following from Ms. Hammeal-Urban.

Email dated September 23, 2021, at 8:35pm from Robin Hammeal-Urban to Pat Sullivan attaching the sole “Agenda” for both meetings stating,

“Dear Patricia,

Thank you for asking about an agenda for next Thursday evening’s meetings. The agenda for both meetings is the same. You will note that there is no action item or decision to be made. This is a conversation between the bishop and a parish.

I hope this information aids in the process of inviting the parish to this conversation.

St. Paul's Church
Agenda for Bishop Ian's Conversation with
Vestry at 5:00 pm
Congregation at 6:30 pm
September 30, 2021

1. Opening Prayer
2. Bishop Ian shares information
3. Listening to questions and concerns from members
4. Bishop Ian and Robin respond to questions
5. Next steps
6. Closing Prayer

Although what Ms. Hammeal-Urban provided is labeled as an "Agenda" no one could possibly have any idea what to expect from such a generic and undetailed document.

Misconduct: Why all the secrecy? Why would Bishop Ian Douglas and Robin-Hammeal-Urban not want to give the Vestry of St. Paul's Episcopal Church a detailed agenda? At the very least, they could have listed topics such as process, possible timeline, share applicable Canons, but they didn't do that. When the Vestry indicated that they would be recording the Bishop and Ms. Hammeal Urban's meetings with them and the Parish to play for those member's not able to attend, they were informed that if they tried recording the meetings that Bishop Douglas and Ms. Hammeal-Urban would leave and not hold any meetings. Rather than have a meeting where the genuine concern was on the members of St. Paul's Episcopal Church, they took the opportunity to misquote the Canons stating that Rev. Samuel was presumed guilty. It's no wonder they did not want their meetings recorded.

How is it possible that Bishop Douglas and Ms. Hammeal-Urban would "misquote" such a basic but important Canon? The answer is that it wasn't a misquote at all. It was intentional. Canon IV.19.16 actually states, "***Presumption of innocence. Sec. 16. There shall be a presumption that the Respondent did not commit the Offense.***" (Emphasis Added)

Why would Bishop Douglas state the opposite? Ms. Hammeal-Urban who not only teaches the Title IV Canons, but also wrote the Title IV Training Manual for the Diocese did not correct Bishop Douglas because apparently it did not fit the narrative that they wished to spread.

Canon IV.19.11, states, "Sec. 11. No person subject to the authority of the Church may attempt to coerce or improperly influence, directly or indirectly, the actions of any body performing functions under this Title, or any member of such body or any other person involved in such proceedings." Perhaps Bishop Douglas and Ms. Hammeal-Urban were looking to improperly influence witnesses and people with knowledge in the pews of St. Paul's Episcopal Church where the Respondent is the Rector.

Email dated January 26, 2022, at 10:41am from Robin Hammeal-Urban to Pat Sullivan and Rev. Amjad J. Samuel stating, “The matter has not been concluded. It has proceeded to another phase that will result in resolution.” (Exhibit 16 attached)

Email dated January 26, 2022, at 11:49am from Michael F. Rehill Counsel to the Rev. Amjad. J. Samuel to Robin Hammeal-Urban inquiring as to what she meant by the phrase “The matter has not been concluded. It has proceeded to another phase that will result in resolution.” used in her email to Respondent and the Sr. Warden. (Exhibit 17 attached)

Email dated January 26, 2022, at 1:09pm from Robin Hammeal-Urban to Michael F. Rehill Counsel to the Rev. Amjad. J. Samuel stating, “What I mean by that phrase is that unlike all the other processes within Title IV to which this matter has already been referred(Possible Agreement with the Bishop, Investigation, and Conference Panel), the Hearing Panel process will not result in a referral to another process but in an adjudication of the presenting issues. This result is, in my mind, a form of substantive resolution with the right of appeal.”

Of course, there will be no adjudication if an Accord is reached before an Order is issued by the Hearing Panel. I would also consider this to be a resolution. I hope the lends some understanding to my statement.”
(Exhibit 18 attached)

Email dated January 27, 2022, at 10:38am from Robin Hammeal-Urban to the Rev. Amjad. J. Samuel stating, “At the conclusion of the Conference Panel proceedings on January 15, 2022, the members of the Conference Panel conferred privately and referred the Disciplinary Matter to a Hearing Panel. ..” (Exhibit 19 attached)

Email dated January 26, 2022, at 1:17pm from Michael F. Rehill Counsel to the Rev. Amjad. J. Samuel to Robin Hammeal-Urban inquiring, “How did you obtain information that this matter has been referred to the Hearing Panel? Please forward me any communication that indicates this, as Respondent has not received anything from the Conference Panel and neither have I as Counsel or Dr. Lutz as his Advisor.” (Exhibit 20 attached)

Email dated January 27, 2022 at 10:35am from Robin Hammeal-Urban to Michael F. Rehill Counsel to the Rev. Amjad. J. Samuel stating,
“Michael

I was carbon copied on the following email message from the President of the Conference on Monday, January 17, 2022.

*To the President of the Disciplinary Board and the Church Attorney:
As a result of the Conference Panel proceedings this past Saturday, January 15, in the above referenced case, it is the determination of the Conference Panel that this case be referred to a Hearing Panel.
Respectfully, Rev. Jack Gilpin President, Conference Panel*

As you know this notice is canonically required by IV.13.1. While notice to the Respondent, Complainants, Advisors, and their counsel does not appear to be canonically required, it was my understanding that such information was communicated to all of these individuals at that time. Today all of those individuals will be updated as to the decision of the Conference Panel.

In accordance with the timeframes set out in Canon IV.13.2, the Hearing Panel will issue its notice.

Members of the Hearing Panel are:

Thom Smith, member of Christ Church Cathedral

The Rev. Louise Kalemkerian

The Rev. Joseph Shepley, President of the Hearing Panel.

Regards,

Robin”

(Exhibit 21 attached)

Misconduct: Although Ms. Hammeal-Urban states that it was her understanding that such information was communicated to all of these individuals at that time, she does not say how she came to her understanding, who told her that information had been communicated. This is another example of Ms. Hammeal-Urban having insider information that has been kept from the Respondent, Respondent’s Counsel and Advisor for no other reason than it did not appear to her that it was canonically required. It is difficult to comprehend how Ms. Hammeal-Urban utilizes the Canons when it suits her but ignores them when it does not.

Misconduct: Ms. Hammeal-Urban is not a member of the Conference Panel. She is a person with knowledge who knows that she will be a witness in this matter and yet instead of informing the Panel that she must recuse herself as such, she chooses to be right in the middle of everything. Ms. Hammeal-Urban has at this point interfered with the Reference Panel and now the Conference Panel in this Title IV Matter.

Email dated January 27, 2022, at 3:21pm from Michael F. Rehill Counsel to the Rev. Amjad. J. Samuel to Robin Hammeal-Urban stating, “Thank you for your reply. It is my understanding that the Canon provides for disclosure by the President of the Conference Panel to the President of the Disciplinary Board and to the Church Attorney. Since you are neither, I would like to know how it is that you were copied on that email, and did anyone else receive a copy of this communication?

In your email you state, "While notice to the Respondent, Complainants, Advisors, and their counsel does not appear to be canonically required, it is my understanding that such information was communicated to all of these individuals at that time."

If your understanding was correct, I would not have had to make my inquiry. However, the bigger concern is that the Conference panel is a confidential process and I would like to know who breached that confidentiality.” (Exhibit 22 attached)

Email dated January 29, 2022 at 10:56am from Robin Hammeal-Urban to Michael F. Rehill Counsel to the Rev. Amjad. J. Samuel stating, “Michael:

Alison Hollo and I share responsibilities for the role of Title IV case manager and are therefore appropriately apprised when a matter is referred to a new canonical process. Regards, Robin.” (Exhibit 23 attached)

Misconduct: Ms. Hammeal-Urban knows that there is no such Canonical position “Title IV Case Manager.” The role that she has improperly taken on is described by Canon, is the Clerk mentioned in Canon IV.5.3.g. **The Disciplinary Board shall appoint a clerk** who may be a member of the Board, who shall be custodian of all records and files of the Disciplinary Board and **who shall provide administrative services as needed for the functioning of the Board.** The clerk, or an assistant clerk who may be appointed at the discretion of the Board, may be any person otherwise qualified who has no conflict of interest in the matter before the Board and who is not barred from serving on the Disciplinary Board under the provisions of [IV.5.3\(c\)](#) or serving on the staff of persons so barred. Ms. Hammeal-Urban knows that she is barred. Not only by the Canons of the Episcopal Church but also by the Canons on Ecclesiastical Discipline in the Diocese of Connecticut. (Exhibit 23 attached)

Misconduct: Unfortunately, Ms. Hammeal-Urban cannot be the Clerk as it violates Canon IV.5.3.g. in the Canons of the Episcopal Church and Canon VIII.1.A.iv. in the Canons of the Episcopal Diocese of Connecticut. **Employees of the Diocese**, current members of the Standing Committee, those individuals specified in the first sentence of Canon IV.5.3(c) of the Church Canons and **any persons affiliated in the practice of law** or otherwise with any of those individuals are ineligible to serve as a member of the Board. Persons who will be eligible to serve on the Board on the date on which their term would commence, may be nominated for and may be elected to the Board even if they would not be eligible to serve on the Board at the time of their nomination or election.

Email dated April 20, 2022 at 7:04 PM from Robin Hammeal-Urban to Michael F. Rehill, Counsel to the Reverend Amjad J. Samuel; Donald J. Allison, Church Attorney and cc: Alison Hollo, Senior Administrator, **Office of the Episcopate**

“Dear Michael and Don,

"On behalf of the Rev. Joseph Shepley, President of the Hearing Panel, I am forwarding to you the attached letter. You are receiving this from me rather than Alison Hollo as she is attending a conference this week..."

Peace,

Robin”

(Exhibit 24 attached)

Misconduct: It appears that the President of the Hearing Panel by his utilizing Ms. Hammeal-Urban as a “Clerk” for administrative is violating the Canons. Ms. Hammeal-Urban cannot be the Clerk as it violates Canon IV.5.3.g. in the Canons of the Episcopal Church and Canon VIII.1.A.iv. in the Canons of the Episcopal Diocese of Connecticut. **Employees of the Diocese**, current members of the Standing Committee, those individuals specified in the first sentence of

Canon IV.5.3(c) of the Church Canons and **any persons affiliated in the practice of law** or otherwise with any of those individuals are ineligible to serve as a member of the Board. Persons who will be eligible to serve on the Board on the date on which their term would commence, may be nominated for and may be elected to the Board even if they would not be eligible to serve on the Board at the time of their nomination or election.

Email dated May 4, 2022 from Michael F. Rehill, Counsel to the Rev. Amjad J. Samuel to The Rev. Joseph Shepley, President of the Hearing Panel stating,
“Dear Judge Shepley:

As you are aware, I am Counsel for the Rev. Amjad. J. Samuel in the above referenced Title IV Matter in which you are the President of the Hearing Panel.

I am writing to let you know that all judges sitting on the Hearing Panel must not have any communication with either Bishop or any member of Bishops' staff, including but not limited to, Robin Hammeal-Urban, Alison Hollo, and the Rev. Sandra Cosman. All of them have been designated as persons having knowledge which may be relevant in the trial of this matter. The Hearing Panel must remain independent of the Bishop's office. While you have the right under the Canons to appoint a clerk and retain counsel to assist you in performing your duties on the Hearing Panel, it is imperative that all members of the Hearing Panel be impartial and not be influenced by either Bishop or any member of the Bishops' staff.

Accordingly, I am writing to request that you provide me with copies of all emails, letters, and other communications between you or either of the two judges with either Bishop or any member of their staff regarding this Matter.

Thank you for your prompt response to this email letter.
Faithfully, Michael (Exhibit 25 attached)

Email dated May 4, 2022 from The Rev. Joseph Shepley, President of the Hearing Panel to Michael F. Rehill, Counsel to the Rev. Amjad J. Samuel cc: Tom Smith, The Rev. Louise Kalemkerian, Donald Allison, Church Attorney, stating,
“Dear Mr. Rehill,

Thank you for your email of May 4, 2022, articulating the concept of impartiality in the above-referenced matter. Please be advised that I, along with my fellow Panel members are aware of this concept. As to your request for correspondence between me and the Panel members and those in the Bishop's office, there is no canon that provides for the provision of communications as you request. Rest assured, we are aware of our obligations under the canons.

Very truly yours,
The Rev. Joseph Shepley
President, Hearing Panel” (Exhibit 26 attached)

Misconduct: It appears that the President of the Hearing Panel by his utilizing Ms. Hammeal-Urban as a “Clerk” for administrative is violating the Canons. Ms. Hammeal-Urban cannot be

the Clerk as it violates Canon IV.5.3.g. in the Canons of the Episcopal Church and Canon VIII.1.A.iv. in the Canons of the Episcopal Diocese of Connecticut.

In February 2022 Bishop Ian Douglas. wrote a Letter to St. Paul's Parishioners

"Dear members of St. Paul's Church,

Greetings in the name of our Lord and Savior, Jesus Christ. I write to provide you with updated information on the pending clergy disciplinary action regarding your Rector, the Rev. Amjad Samuel.

I present this information as part of my canonical obligation to provide pastoral support to all individuals and communities affected by a clergy disciplinary action and in my role as Bishop Diocesan and provider of pastoral care for all parishes in ECCT.

It was my hope to return to St. Paul's to meet with you to explain this updated information in person. This would allow time for questions and exchange of information. The Executive Committee of St. Paul's Vestry, however, has requested that I provide the updated information by letter. While I would prefer to be with you in person for this discussion, I am honoring the request of the Executive Committee and providing an update in this letter.

You may recall that I, along with Robin Hammeal-Urban, ECCT's Pastoral Response and Disciplinary Resource Officer, met with you and your Vestry on September 30, 2021. At that time, we shared that the disciplinary action had been referred to a Conference Panel. A Conference Panel is one means of resolving a clergy disciplinary matter as specified in Title IV of the Canons of The Episcopal Church. Every diocese is required to follow these disciplinary canons.

You may also recall that I pointed out that the Conference Panel proceedings are independent of the bishop's office. I thus have had no direct involvement in the deliberations or decisions of that Panel. The Conference Panel was composed of two people who are members of ECCT's Disciplinary Board. It is my understanding that the Conference Panel was unable to resolve the matter and then decided to refer the matter to a Hearing Panel.

Like the Conference Panel, the Hearing Panel is also independent of the bishop's office, and I have no role in its proceedings. The Hearing Panel is composed of three different members of ECCT's Disciplinary Board. Two members of the Hearing Panel are ordained. The Hearing Panel will oversee a formal and public process, and is obligated to make their documents "broadly known to members of the Church and Church media". (Canon IV. 13.3) I want to make you aware of this so that you are not surprised when you see information and materials about disciplinary action publicly disseminated by the Hearing Panel.

To learn more about the Hearing Panel process and the clergy disciplinary process you can consult www.TitleIV.org, or training material on ECCT's website at <https://www.episcopalct.org/clergy-discipline-process/>. If you have additional questions or concerns, Robin is available for conversation and can be reached at rurban@episcopalct.org.

I am very sorry that this disciplinary action concerning your Rector is taking so much time, and I pledge myself to continuing efforts to seek reconciliation of all parties involved. Please know that I hold you, your Rector, the Hearing Panel, and all involved in this disciplinary process in my prayers for healing, justice, and restoration. God bless you.

Faithfully,

The Rt. Rev. Ian T. Douglas, Ph.D

Bishop Diocesan"

(Exhibit 27 attached)

Misconduct: Bishop Douglas's letter to the Parish congregation of St. Paul's Episcopal Church is dishonest and intentionally misleading. He falsely states that the Conference Panel is independent of the Bishop's Office, yet email documentation shows how Robin Hammeal-Urban was copied on confidential correspondence and was communicating for and about the Conference Panel. Bishop Douglas goes on to claim that the Hearing panel is independent from the Bishop's office but Ms. Hammeal-Urban has interfered there too interacting with the President of the Hearing Panel and sending an improper email on behalf of the President of the Hearing Panel, the Rev. Joseph Shepley. Additionally, Alison Hollo has also been utilized in an administrative way by The Rev. Joseph Shepley and Alison Hollo's Title on the Diocesan Website is "Senior Administrator, Office of the Episcopate"

MISCONDUCT SUMMARY

Enough is enough. Repeatedly Bishop Douglas and his "enforcer" Ms. Hammeal-Urban have denied the Respondent his rights under the Canons. Repeatedly they have separately and together attempted to withhold information, reports, and provided false information, including but not limited to referencing an "Investigator's report" that does not now, nor has it ever existed as required by the Canons. One might wonder why? Why have they continued to disregard the Canons? Why have they lied and been dishonest? How many others have they treated this way who they have bullied to leave the Diocese or stay and never work again?

It is no secret that Ms. Hammeal-Urban does not want clergy to actually read the very Canons that clergy are required to obey. In an effort to keep clergy in the dark, and only listen to what she says, is prominently displayed on her bio on the ECCT website, "***Robin points out that reading the canons can be a bit dry. There are easier to understand Title IV Training Materials available through our website!***" Emphasis added. (Exhibit 28 attached)

Why Ms. Hammeal-Urban would think that the clergy of the Diocese would not be able to handle reading the Canons is beyond the scope of reason, except that she did not want the

clergy to be educated and understand their albeit limited rights under the Canons, unless of course that education came through her, and she could control it.

If one were to simply read through all of the emails that Ms. Hammeal-Urban sent that are exhibits to this motion one would see that Ms. Hammeal-Urban has her hands in every part of the Title IV Process. That is no accident.

How many “hats” can Robin Hammeal-Urban wear to interfere with the Title IV process? She is supposedly the “Pastoral Response and Disciplinary Resource Officer.” She is the “Title IV Case Manager” She is the “Canon for Mission Integrity & Training.”

It is interesting to note that although Ms. Hammeal-Urban identifies herself as the “Title IV Case Manager” or “Canon for Mission Integrity & Training.” or Pastoral Response and Disciplinary Resource Officer.” in her emails, she is only identified on the Episcopal Diocese of Connecticut’s website as Pastoral Response and Disciplinary Resource Officer.” None of her other made up noncanonical titles appear on her bio page. However, she is identified and listed under staff.

Ms. Hammeal-Urban has been present at meetings between Bishop Ian Douglas and the Respondent with Respondent’s Counsel and Advisor. She has repeatedly corresponded with Respondent’s Counsel speaking with the Authority of Bishop Douglas. Bishop Douglas even wrote to Respondent’s Counsel stating that she would be communicating with him and not himself. She has been present for the Reference Panel Meeting and copied on information regarding same. She was given a copy of the Church Attorney’s Report and falsely stated that she had seen the Investigator’s Report of which it is now known that the Investigator did not write or prepare an Investigator’s Report.

Ms. Hammeal-Urban has inserted herself in the Conference Panel stage and was copied on confidential correspondence, and by her presence and communication has interfered there too. She has even communicated with the Hearing Panel in this matter and sent messages on behalf of the President of the Hearing Panel.

Robin Hammeal-Urban is a witness in this Matter. At the very least every single person within the Diocesan immediate staff including Ms. Hammeal-Urban knows this fact. And yet, Ms. Hammeal-Urban who is the person who teaches the Title IV information to clergy in the Diocese, has repeatedly participated in and acted outside of the mandates in the Canons of the Episcopal Church as well as the Canons of the Episcopal Diocese of Connecticut.

Bishop Douglas and Ms. Hammeal-Urban cannot continue to make things up as they go along. I have no way of knowing what Ms. Hammeal-Urban has advised members of the Panels or what she has shared with them, or even what they have shared with her. What I do know, is that Ms. Hammeal-Urban is a witness in this matter and her behavior and actions are improper.

When all of these emails and other documents are put together, it becomes apparent that Bishop Douglas and Ms. Hammeal-Urban have a pattern of violating the Canons of the Episcopal Church and the Canons of the Episcopal Diocese of Connecticut. It remains to be seen whether or not these improper and non-canonical tactics have been utilized over and over again in Title IV Matters in the Diocese of Connecticut. Ms. Hammeal-Urban cannot claim ignorance of the Canons that she teaches. She worked for the Bishop and often is seen as an extension of Bishop Ian Douglas including speaking for him.

By the sending of the email on behalf of the President of the Hearing Panel Ms. Hammeal-Urban has confirmed in writing that she has interjected herself into the Reference

Panel, The Conference Panel, and now the Hearing Panel in the Title IV Matter pending against The Reverend Amjad J. Samuel. There is not a chance in the world that Reverend Samuel will be able to have a fair Hearing in this Matter.

This entire Title IV process is incestuous at best, and pure evil at its worst. I cannot imagine any member of the Clergy in the Diocese of Connecticut feeling that he, she or they would have a chance in the Title IV Process. If the Conference Panel and the Hearing Panel were actually independent of the Bishop's office as Bishop Douglas claims, Ms. Hammeal-Urban would not have been sanctioned by him to interfere at every single step of the way.

If any of the clergy who have experienced any of the above misconduct by Bishop Douglas and/or Ms. Hammeal-Urban read this Motion, whether they are still in the Diocese of Connecticut or not, I urge them to make themselves known so that it can be shown how widespread the problems for the Clergy in the Diocese of Connecticut have been. It would also be interested to find out how many of the Clergy who have been treated as the Rev. Amjad Samuel have are clergy of color and if that aligns with the Churchwide Audit.

MANDATORY DISCLOSURES

In accordance with the Canon IV.13.5a, of The Episcopal Church the Church Attorney and Counsel for the Respondent must timely exchange Mandatory Disclosures. Canon IV.13.5a states, "Within sixty days after the filing and delivery of the response by the Respondent, the Church Attorney and the Respondent's counsel shall each provide to the other a mandatory disclosure of all evidence known to them that would tend to prove or disprove the allegations against the Respondent, including but not limited to (1) the name and, if known, the address and telephone number of each individual likely to have direct knowledge of information which may

be used to support the allegations against the Respondent or the defenses thereto, together with a detailed summary of the expected testimony of the person, if called to testify; and (2) a copy of, or a description by category and location of, all documents and tangible things that may be used to support the allegations against the Respondent or the defenses thereto, except as such disclosure would involve Privileged Communications. The parties must supplement mandatory disclosures made under this section as additional information becomes known. Documents and tangible items identified in the mandatory disclosures that are in the possession of a party shall be produced upon request, and copies of all documents provided to the requesting party. The Hearing Panel may, upon request of a party or Injured Person, enter an order limiting production of documents or tangible items of a sensitive nature.”

Mandatory Disclosures in this matter were required to be exchanged by April 26, 2022. The Respondent, the Rev. Amjad J. Samuel, through his Counsel, Michael F. Rehill produced Mandatory Disclosures timely on April 26, 2022, fulfilling their obligation under Canon IV.13.5.a. Unfortunately, the same cannot be said for the Episcopal Diocese of Connecticut or its counsel, Donald J. Allison, the Church Attorney. It is now six months past the date that the initial Mandatory Disclosures were due, and the Church Attorney still has not produced to Respondent’s Counsel the required Mandatory Disclosures.

On October 3, 2022, following the Oral Argument on the Church Attorney’s motion to remove [REDACTED] as a Complainant in this Title IV Matter, the Rev. Joseph Shepley, President of the Hearing Panel opened discussion on the outstanding Discovery.

During that discussion, the Church Attorney stated, “... I would be prepared to have my discovery comply with the existing order.”

The Church Attorney can do that because Respondent provided his Mandatory Disclosures to the Church Attorney when they were required in compliance with the Canons.

It is now more than six (6) months after Mandatory Disclosures were due. I still have not received all of the Mandatory Disclosures from the Church Attorney despite over 20 emails being exchanged between me, as Counsel for the Respondent and the Church Attorney, and each of us with The Rev. Joseph Shepley as the President of the Hearing Panel and a Zoom Conference between Counsel and multiple telephone calls between me and the Church Attorney. The bias and withholding of information from Respondent and his Counsel and Advisor and the deception, cover-ups and deliberate and willful ignoring of the Canons in the Matter started practically from day one.

In that same October 3, 2022, Zoom discussion following the oral argument I responded to the Church Attorney's initial comments stating in pertinent part, "...Don knows well that there are lots of things that they have not provided to us in the way of mandatory disclosures. Without the mandatory disclosures we cannot go to the next step which is the depositions and interrogatories... We have repeatedly, as recently as today, sent emails to Mr. Allison asking him to please provide the mandatory disclosures, please provide us with the documents that we have requested that were required to be provided to us in accordance with the Canons of the Episcopal Church. ...

The Mandatory Disclosures is the very first thing that is required once the matter goes to a Hearing Panel. The very first thing. It hasn't happened yet. We have gotten some, we have had things dribbled to us piece by piece but much of what we requested Don has acknowledged that they exist, but he hasn't gotten them to us yet. ... We have requested correspondence with the Bishop (Douglas) and we haven't received any of it. Not one letter not one piece of correspondence and we have requested it repeatedly and the reality is that without receiving the mandatory disclosures we can't proceed with discovery and that is the reason everything is stopped. We keep asking but it hasn't happened yet."

The Church Attorney then responded to my comments stating, "... I think it is important that I respond. First of all right away I provided to the Respondent every document, every note of any interviews, whatever we had that we could find."

That statement is simply not true. Mr. Allison did not provide anything right away. The following is a timeline of when Respondent received partial documentation from the Church Attorney.

April 26, 2022

1. Mr. Allison emailed an improper list of “Potential Witnesses” which according to Canon IV.13.5a was supposed to be, “the name and, if known, the address and telephone number of each individual likely to have direct knowledge of information which may be used to support the allegations against the Respondent or the defenses thereto, together with a detailed summary of the expected testimony of the person, if called to testify;” The Church Attorney’s list was simply a list of names and phone numbers. He did not include a detailed summary from anyone and his list was woefully deficient even to the point that absent from his list were Bishop Douglas, Bishop Ahrens, and Robin Hammeal-Urban although they have all interacted with Complainants, witnesses and the Respondent in this Matter, including at times in ways that violate the Canons of the Episcopal Church via their actions;
2. Mr. Allison provided the Intake Report;
3. Mr. Allison provided some video Zoom and audio recordings of interviews taken by James Allison and/or himself. However, those recordings were incomplete and missing the beginnings and in some cases the person that they were interviewing was not even identified;
4. Documentation of St. Paul’s 2021 budget; and
5. Interview notes but not identified as to whose notes they are purported to be.

April 28, 2022

1. Mr. Allison provided an incomplete Mandatory Disclosure of Witness list with expected testimony, which included references to the five women who complained in 2017-2018. This list was still missing Bishop Douglas, Bishop Ahrens, and Robin Hammeal-Urban;
2. Mr. Allison also provided documentation that Respondent’s Counsel sent to him on April 26, 2022, as part of Respondent’s Mandatory Disclosures.

June 7, 2022

1. Mr. Allison provided two letters that he received.
2. Mr. Allison provided both his and his son’s notes from the interviews.

June 15, 2022

1. Letter from Mr. Allison to The Reverend Shepley acknowledging that Mandatory Disclosures were due on April 26, 2022, and he still has documents to provide. (Exhibit 29 attached)

June 24, 2022

1. Mr. Allison provided materials from his email folder (two months after Mandatory Disclosures were required certainly is not “Right away”)
2. Mr. Allison provided Tanya Wallace Materials; and

3. Mr. Allison provided Robin Hammeal-Urban file Materials.

July 29, 2022

1. Mr. Allison provided “3 sets of documents from Robin Hammeal-Urban”

When placed in a timeline it is easy to see that nothing was given to Respondent “Right away” from the Church Attorney.

The Church Attorney went on to state, “He literally has gotten everything in my file relating to my investigation into this matter.”

The Church Attorney knows full well that there is still documentation that has not been turned over to the Respondent and is still outstanding.

The Church Attorney goes on to state, “He requested from me that I obtain information from incidents that occurred in many years, four years before, relating to some previous complaints and attempts to mediate those complaints. It involved getting documents from Robin Hammeal-Urban. It involved getting documents from Bishop Laura Ahrens. It involved getting documents from two or three the two mediators that were originally retained those years ago. Their notes were all provided to him, reduced to its essence.”

The Church Attorney’s own Statement of Offenses directly references the 2017-2018, allegations although the Church Attorney’s and the Respondent’s interpretations of these allegations differ greatly. (Exhibit 30 attached)

The Church Attorney further stated, “He did not accept my statement that the investigator in this case who is a lawyer working in Connecticut and who is my son that he did not prepare, an Investigator Report the only report was mine which he has. He didn't accept that. He wanted my son to prepare a report. If that is what is holding this up, that James Allison did not write a report, that’s, it borders on the ridiculous. It should not be holding up discovery. **I have made the representation that there was no Investigator’s Report.**” (Emphasis Added)

What is ridiculous is the cavalier attitude that the Church Attorney has regarding the Canonical requirements and process in Title IV Matters in the Episcopal Church and the lack of adherence on his and his client, the Episcopal Diocese of Connecticut’s part of same. This Title IV Matter has been going on for well over a year and it is now just coming out that there is no

Investigator's Report as required by Canon. This entire process has been tainted by multiple Canonical violations that have been hidden and covered up by the Diocese and Diocesan staff.

Canon IV.2 of the Canons of the Episcopal Church states, “Investigator shall mean a person having (a) sufficient knowledge, skill, experience and training to conduct investigations under this Title and (b) familiarity with the provisions and objectives of this Title. Investigators shall be appointed by the Bishop Diocesan in consultation with the president of the Disciplinary Board. The Investigator acts under the direction of the Reference Panel until a referral is made pursuant to [Canon IV.11.3](#); after such referral, the Investigator shall be overseen by and report to the Church Attorney.”

Canon VIII.2.E of the Canons of the Episcopal Diocese of Connecticut state, “E) Investigator. The Bishop shall appoint an Investigator in consultation with the Standing Committee. The Investigator may but need not be a Member of the Church. The Bishop may terminate the term of the Investigator with the advice and consent of the Standing Committee. The Diocese may compensate an Investigator for services rendered at the rate described in a written retainer agreement. Whether or not an Investigator is compensated, the Diocese shall reimburse an Investigator for reasonable and necessary expenses incurred in a proceeding under this Canon.”

All of the people on this Reference Panel would be well aware that there was no Investigator's Report written or received by James Allison. Therefore, the entire Reference Panel in this Matter, which included Bishop Ian Douglas, Intake Officer and attorney, Olatkotunbo T. Green, and the President of the Disciplinary Board, The Rev. Linda Spiers, and which was attended by Robin Hammeal-Urban, Esq., who drafted the Title IV Training Manual for the Episcopal Diocese of Connecticut knew that James Allison who had not been appointed in

accordance with the Canons, had not drafted an Investigator's Report that he was required by Canon to draft.

Furthermore, Ms. Hammeal-Urban blatantly lied in an email to the Respondent. Email dated, September 2, 2021, at 9:46pm from Robin Hammeal-Urban to Amjad, "As you may recall, in very general terms the Disciplinary Action Intake report identified concerns regarding: Your role in the relationship with the Christian Counseling Center (CCC), oversight of Parish Finances, and treatment of people/parishioners who disagree with you. The Investigator's report..." (see Exhibit 7 hereinabove) Ms. Hammeal-Urban has once again falsely referenced an "Investigator's report" which never existed.

Additionally, according to Canon XIII.2.A.iv of the Canons of the Diocese of Connecticut. because Ms. Hammeal-Urban is a lawyer, she is barred from being a member of the Disciplinary Board. Each of the Panels is comprised of people from the Disciplinary Board plus the Bishop is on the Reference Panel. As per the Canons of the Diocese of Connecticut, Employees of the Diocese, current members of the Standing Committee, those individuals specified in the first sentence of Canon IV.5.3(c) of the Church Canons and any persons affiliated in the practice of law or otherwise with any of those individuals are ineligible to serve as a member of the Board. Persons who will be eligible to serve on the Board on the date on which their term would commence, may be nominated for and may be elected to the Board even if they would not be eligible to serve on the Board at the time of their nomination or election.

Mr. Allison does not see any problem with the fact that he, along with Bishop Ian Douglas, Ms. Hammeal-Urban, the Reference Panel and the Conference Panel and his son, James Allison, Investigator, have all perpetrated a fraud on the Title IV process at the expense of the Respondent, The Rev. Amjad J. Samuel.

Incredibly the Church Attorney went on to complain that I was asking for information surrounding allegations that were proven untrue.

He stated, “The other thing to tell you that Mr. Rehill asked me for today, was a statement from me that, I have already told him that my interview with one individual in this matter who I interviewed on a discreet issue that resolved quickly that didn't even make it into my complaint because I dismissed those allegations early on. He wanted me to write an email having already told him what this person said, telling him that I did not record it having told Mr. Rehill that I did it to wrap up that one discreet issue from my cell phone, from my car. He is waiting on that. If that's what's holding up discovery, him proceeding with discovery that's also absurd.”

Mr. Allison once again is denying the Respondent due process by ignoring the Canons when it suits him. The fact that I wanted Mr. Allison to provide me something in writing regarding allegations that were made that were dismissed because they were not creditable has a huge impact on the Respondent's case. The Complainants made allegations, each and every allegation that was made that is proven false or that the Church attorney cannot substantiate speaks to the credibility of the person or persons who made such false allegations. That relief is provided for in the Canons of the Episcopal Church. Canon IV.13.5a states in pertinent part, “the Church Attorney and the Respondent's counsel shall each provide to the other a mandatory disclosure of all evidence known to them that would tend to prove **or disprove the allegations against the Respondent**” It is necessary for the Church attorney to give us all exculpatory information and evidence (Emphasis added)

Mr. Allison seems to want to ignore the fact that many of the allegations made against the Respondent neither he nor his son, could find evidence to support. In fact, neither he nor the investigator in this matter could find any financial impropriety or wrongdoing with the Christian Counseling Center, or that Respondent was doing anything improper regarding his oversight of the Parish's finances. Or even the bogus allegation that Respondent was falsifying the attendance records when he is not the one who is responsible for counting or recording them.

Anyone with any common sense might say, “hey wait a minute Respondent is accused of being mean to people, perhaps the people who made false allegations are lying about that too”, especially when one of the Complainants made a racist post on Facebook about Pakistani people and explosives and other Complainants “liked” that racist post. (Exhibit 2 hereinabove)

He went on to say, “The one issue that he is waiting for is any documentation from Bishop Douglas much of which he has in the context of communications that I provided with Robin Hammeal-Urban with Bishop Ahrens and other individuals he's got the whole file the whole Diocesan file from the 2017 or 2018 series of events that aren't even an issue here. I bent over backwards, the statement that I can't proceed with written and deposition discovery because of what he claims I still owe him which I didn't even believe I owed him in the first instance, but I was willing to bend over backwards is it borders on the absurd. It really does. He's got everything I have in my file, every note, ya know everything.”

Mr. Allison can claim he is bending over backwards as he puts to get Respondent information and moan about all of the work he has to do, but he has no one to blame but himself. If the 2017 or 2018 so called series of events are not even an issue here as Mr. Allison states, then why on earth did he even mention them in his Statement of Offenses? Respondent and I would never have needed to request any documentation regarding this if Mr. Allison did not make false statements about the nature of those interactions in an attempt to disparage the Respondent. What Mr. Allison doesn't know is that his statements couldn't be more wrong regarding the 2017 or 2018 allegations. However, what he should know is that if he mentions something in his Statement of Offenses, the Respondent and I are going to address it. If those events have nothing to do with this matter, then Mr. Allison should remove them entirely from his Statement of Offenses. (Exhibit. 30 attached)

As for Mr. Allison stating that I am waiting for documentation from Bishop Douglas that is true. It is clear that Bishop Douglas has acted improperly from the small amount of information that I do have in my possession. Despite the fact that the Church Attorney sent an email to me on June 7, 2022, stating that he was reaching out to Bishop Douglas, the Bishop did

not respond with any documentation. I finally, after giving Bishop Douglas many months to cooperate with this Title IV Process, wrote to Bishop Douglas myself on October 10, 2022, stating,

“Dear Bishop Douglas:

As you are aware, Canon IV. 1. Of Accountability states in pertinent part,

“Canon 1: Of Accountability and Ecclesiastical Discipline

Accountability. ... This Title applies to Members of the Clergy, who have by their vows at ordination accepted additional responsibilities and accountabilities for doctrine, discipline, worship and obedience.”

Canon IV.3. further provides,

“Canon 3: Of Accountability

1.Causes for proceedings. Sec. 1. A Member of the Clergy shall be subject to proceedings under this Title for:

“...failing without good cause to cooperate with any investigation or proceeding conducted under authority of this Title.

Intentionally and maliciously bringing a false accusation or knowingly providing false testimony or false evidence in any investigation or proceeding under this Title.”

Additionally, Canon IV.13.5.a provides,

“ Sec. 5. The Church Attorney and the Respondent shall each be afforded reasonable time and opportunity to discover evidence in preparation for the hearing as follows:

a. Within sixty days after the filing and delivery of the response by the Respondent, the Church Attorney and the Respondent’s counsel shall each provide to the other a mandatory disclosure of all evidence known to them that would tend to prove or disprove the allegations against the Respondent, including but not limited to (1) the name and, if known, the address and telephone number of each individual likely to have direct knowledge of information which may be used to support the allegations against the Respondent or the defenses thereto, together with a detailed summary of the expected testimony of the person, if called to testify; and (2) a copy of, or a description by category and location of, all documents and tangible things that may be used to support the allegations against the Respondent or the defenses thereto, except as such disclosure would involve Privileged Communications. The parties must supplement mandatory disclosures made under this section as additional information becomes known. Documents and tangible items identified in the mandatory disclosures that are in the possession of a party shall be produced upon request, and copies of all documents provided to the requesting party. The Hearing Panel may, upon request of a party or Injured Person, enter an order limiting production of documents or tangible items of a sensitive nature.”

As the Bishop Diocesan, you are familiar with the Canons, especially Title IV, including the Canons quoted herein. You are certainly well aware of the Stages in the Title IV Matter involving Fr. Amjad J. Samuel. Sometime on or about May 26, 2022, or early June, 2022, it is my understanding that the Church Attorney reached out to you as well as others looking for information consistent with canon IV.13.5.a herein above. As a result of that request for information, I have received information via the Church Attorney, from several people including but not limited to Robin Hammeal-Urban and Bishop Laura Ahrens pertaining to this matter. Unfortunately, I have received nothing from you. If you have produced documents and information in accordance with the Canons cited herein, please let me know to whom you have given this information and on what date(s). If you have not produced any documents and information, please be advised that you are in violation of Canon IV.3. I urge you to comply and cooperate with this Title IV process so as not to cause any further delay. Please be guided accordingly.
Faithfully, Michael” (Exhibit 31 Attached)

Following the Church Attorney’s statements and complaints about what Respondent and I are requesting that he produce as Mandatory Disclosures, Rev Shepley, President of the Hearing Panel unilaterally, and without being asked to comment, decided to give his opinion which is unsubstantiated by the Canons of the Episcopal Church and the Title IV Training Manual, for the Episcopal Diocese of Connecticut.

Rev Shepley stated to the Church Attorney, “You can only provide that which you have Mr. Allison. That's one point I would like to make.”

Fortunately for the Respondent, Rev. Shepley’s statement is wrong and contrary to the Canons of the Episcopal Church

According to the Title IV Training Manuel for the Episcopal Diocese of Connecticut which was drafted by Robin Hammeal-Urban, Esq. the “**Church Attorney (CA)** represents the church in Title IV proceedings and has broad authority under Title IV.

In connection with an investigation, the CA has “access to the personnel, books and records of the Diocese and its constituent parts (IV.2);”

Rev. Shepley went on to ask a question he already knew the answer to for no apparent reason.

“The other, Mr. Rehill, is it is your right to file a motion to compel him to give information, did you do that?”

Despite the fact that Rev. Shepley knew I had not filed a motion I replied to his disingenuous question anyway. “We can do that. We have not done that until now because up until today, Mr. Allison had repeatedly said I'll get it to you, I'll get it to you as quickly as I can. I will get it to you. That's what we've heard, and I have known Don for a lot of years and I accepted that. Now he is telling me "Oh, I gave you everything." He didn't give us everything. He didn't give much and the reality is yes we can make a motion to compel to comply with the canons particularly Title IV.13. 3-5 a which says what he is supposed to provide to us. The bottom line, it's not enough to say I gave you everything. It's not enough to say I gave you files. He has to tell what did you produce, what did you provide and it is not enough to say well the investigator didn't write a report although canons require a report. It is not enough to say well he is my son and he said he didn't do it, he must not have done it. It's not enough. We have to follow the canons. You know we're a church that lives by the books and that's one of the books and we live by the canons. We have people who were interviewed and supposedly the interviews notes got lost. How do we proceed with Discovery in those situations. I mean we are not asking for that much and we were told there were videos that have never been provided. I mean the people who were being interrogated on video, but there were no videos that were produced to us. We have some but not all. So we have questions that need to be dealt with. I didn't expect to be addressing that issue today. Dealing with issues, matters of discovery. I will be happy to file a motion if necessary because clearly this Panel has a right to know where we actually stand in terms of discovery.”

Thank you Mr. Rehill. I would ask, as the Presiding Judge here, that you file that motion within the week. Will you do that?"

I responded with, “Certainly.”

Reverend Shepley then went on to say, “Thank you. Mr. Allison, do you have a response?”

Mr. Allison replied, “My only response is I did give Mr. Rehill everything that I had in my file written, every note, everything. The canons require me to make mandatory disclosure of relevant material. I.....in my view, what occurred in 2017 and 2018 at the diocesan level was not relevant to complaints made in 2020 and 2021 but nevertheless I bent over backwards to run that material down for Mr. Rehill. You know, I understand my obligations to provide all the relevant discovery and I have endeavored to do that. Mr. Rehill is correct, we cannot locate one.....one, recording of an interview and that, that's basic and he doesn't have Bishop Douglass's file. Those are the two things. That's, that's it.”

Unfortunately, what Mr. Allison states is not true regarding outstanding Mandatory Disclosures. Emails from Mr. Colvin as well as Ms. Chapman below indicate that at least two, if not more zoom videos are missing. It is interesting to note that both Ms. Chapman and Mr. Colvin are supportive of the Respondent and the Church Attorney and James Allison cannot seem to find their recordings.

Email dated July 18, 2022 at 07:19 PM from Scott R. Colvin to Michael F. Rehill, Counsel to The Reverend Amjad J. Samuel
Attorney Rehill.....

"I had a Zoom meeting with James Allison on this topic on Tuesday, June 15, 2021 starting at 1 PM which I agreed to have recorded.

Regards.....Scott" (Exhibit 32 attached)

Email dated July 20, 2022 at 07:04 PM from Sunhwa Chapman, Junior Warden at St. Paul's Church to Michael F. Rehill, Counsel to The Reverend Amjad J. Samuel

"This is Sunhwa Chapman, Junior Warden at St. Paul's Church

I had a zoom meeting with James and Donald Allison about St. Paul's Title IV Investigations on 6/11/2021 and agreed to record our meeting.

Please feel free to contact me if you have any questions or concerns.*

Thank you,

Sunhwa Chapman" (Exhibit 33 attached)

If what Mr. Allison says is true about him giving me everything that he has and is required to provide, then there would have been no need for multiple emails back and forth including from the President of the Hearing Panel regarding same.

Email dated May 25, 2022, at 12:46pm from Michael F. Rehill, Counsel to the Rev. Amjad J. Samuel to The Reverend Joseph Shepley, President of the Hearing Panel stating,

"Dear Judge Shepley:

The Church Attorney has failed and refused to comply with Canon IV.13.5(a) and provide the Mandatory Disclosures required by that Canon and the Discovery Plan and Scheduling Order you entered as President of the Hearing Panel in this Matter on May 5, 2022.

Therefore, in accordance with paragraph 5(b) of the Discovery Plan and Scheduling Order, I am writing to formally request a Hearing before you to compel compliance with Canon IV.13.5(a) by the Church Attorney.

I am sending an email to the Church Attorney advising him of this request, and I have copied you on that email.

Faithfully, Michael (Exhibit 34 attached)

Email dated June 7, 2022, at 11:28am From Donald J. Allison to Michael F. Rehill Counsel to the Rev. Amjad J. Samuel stating,

“Hi Michael,

I am reaching out today to Ian Douglas, Robin and Laura to ask for copies of any communications with the witnesses in this matter. I am also requesting that they provide me with copies of Dioceses' and any one of their entire 2018 file.

I am also reaching out today to Jane and Tanya to request any and all material they have in connection with the 2018 matter.

I will email the various witnesses in this matter tomorrow to request copies of any relevant materials they have as well as any communications they have had with each other.

Finally, I will again review my emails in this matter tomorrow to determine if I have had any substantive communications with the various witnesses.

I will provide you with copies of what I receive (unless some are privileged in which case I will prepare a list of claimed privileged material).

Best, Don” (Exhibit 35 attached)

Email dated July 20, 2022, at 3:44 PM from The Reverend Joseph Shepley, President of the Hearing Panel to Donald J. Allison, Church Attorney

“Dear Mr. Allison,

Have you conferred with Mr. Rehill over whether he opposed your request to redact the name of [REDACTED]? If not, please so advise and that will determine whether we set a briefing schedule.

Very Truly Yours

The Reverend Joseph Shepley

Hearing Panel President” (Exhibit 36 attached)

Email dated July 21, 2022, at 9:43 AM from Donald J. Allison, Church Attorney to The Reverend Joseph Shepley

“Dear Rev Shepley,

I reached out to the Mr. Rehill and Rev. Samuel's advisor Ms. Lutz by email yesterday to ask whether they intended to oppose my motion. I have not heard from either of them. I will advise you if/when I do.

Very truly yours, Don” (Exhibit 37 attached)

Email dated July 21, 2022, at 10:07 AM from Pamela L Lutz, Respondent's Advisor to Donald J. Allison, Church Attorney

“Good morning Mr. Allison,

You sent your email regarding your motion at 4:46 pm yesterday. While I understand that you would like an instant reply, it is unreasonable to expect a response without allowing us the opportunity to consider your motion thoughtfully and prayerfully.

In addition, it is my understanding that Mr. Rehill is still waiting for some outstanding Mandatory Disclosures from you.

Thank you. Pamela” (Exhibit 38 attached)

Email dated July 21, 2022, at 3:19 PM from Donald Allison, Church Attorney to Dr. Pamela L. Lutz, Advisor to The Rev. Amjad J. Samuel cc: The Reverend Joseph Shepley

“Hi Pam,

When I reached out to both you and Michael yesterday, I did not expect an immediate response. I simply wanted to advise Rev. Shepley that I had reached out and was awaiting a reply. My intent was to forego the setting of a hearing date until you and Michael had the chance to consider how you wanted to respond to the motion.

In the interest of moving along and avoiding protracted motion practice, I previously agreed to both yours and Michael's request that I reach out to various individuals, many of whom I did not interview in my investigation and who, in my opinion are not relevant to behavior of your client that is the subject of this matter, and to ask if they had any documentation in their possession or control relating to events that predated those giving rise to this case. I have provided you with all of the documentation I have received as a result of those requests. Obviously, to the extent I receive any new documentation, I will promptly provide you with copies.

At your request I also indicated to you that I would provide you with a statement from the investigator advising you that all of the materials in his possession, including recordings of witness interviews, relating to his investigation have been turned over to me. While the investigator has advised me orally and I have so advised you that he has nonetheless agreed to provide a written statement from him to that effect which I have not yet done. The only outstanding mandatory discovery issue as far as I am concerned is providing you with the investigator's statement indicating that he turned all of the material over to me. I will follow up with that early next week.

To date we have had numerous conversations over the telephone and even by zoom. You have provided me with your cell phone number and I have provided you with mine. I trust that the mutual cooperation between us continues....I am available to discuss any matter at Michael's and your convenience. *

Best, Don (Exhibit 39 attached)

As the Zoom discussion on October 3, 2022 regarding Outstanding Mandatory Disclosures was winding down, I stated, “We'll file the motion.”

To which Rev. Shepley responded, “Please do so Mr. Rehill within the week and as a reminder by the end of November depositions should be completed. There are ten of them. As November 21st is the close of discovery. And Mr. Rehill back to the week, it should be specific about what is missing. And Mr. Allison needs to certify as to what he has done. Okay?”

I then responded to my concerns regarding Rev. Shepley's deadlines and timing when I did not even have all of the Mandatory Disclosures from the Church Attorney.

“It is certainly ok the first part. We will get our motion out by Sunday but the issue regarding when the time for depositions, there is no way in the world that can be done within that time frame. Seriously, it is not possible. We don't have the discovery yet. The mandatory disclosures

are necessary before the depositions can be taken. It can't be done. It's impossible to do that. I mean I will make an application to modify the schedule. I didn't realize that, that was coming on today because I would have requested that immediately. The reality is that it is simply not possible to do that and we need, discovery in these cases is the most important. Without discovery, proper discovery, nobody can defend a case.”

Outstanding Mandatory Disclosures

Please provide the Following Outstanding Mandatory Disclosures

1. The recordings that were provided are not complete. They began after you or James, had already been talking to the potential witnesses. We do not know what instructions, comments, direction or other information was provided to these people. In many cases, the people are not even identified as to whom you or James is speaking to on the video. Please provide the complete interviews for each and every Zoom video and identify the person in each video.
2. Your Interview notes from your interview of Bishop Ian Douglas, James Interview Notes from his interview of Bishop Ian Douglas,
3. From Bishop Douglas
 - a. any and all of his documents including emails, notes, formal or informal relating to this Title IV Matter;
 - b. any and all of his documents including emails, notes formal or informal relating to the 2017-2018 allegations;
 - c. any and all documentation including emails, notes, formal or informal between him and Robin Hammeal-Urban relating to this Title IV Matter,
 - d. any and all of his communications, including emails with Robin Hammeal-Urban or Alison Hollo that either of them were cc'd on about or to any Panel in this Matter;
 - e. all of his communications with the Conference Panel and the Hearing Panel or any of its members after they were selected for this Matter.
4. Your Interview notes from your interview of Bishop Laura Ahrens, James Interview Notes from his interview of Bishop Laura Ahrens
5. Your Interview notes from your interview of Robin Hammeal-Urban, James Interview Notes from his interview of Robin Hammeal-Urban
6. From Robin Hammeal-Urban
 - a. any and all of her documents including emails, notes, formal or informal relating to this Title IV Matter that she has not already produced;
 - b. any and all of her documents including emails, notes formal or informal relating to the 2017-2018 allegations that she has not already produced;
 - c. any and all documentation including emails, notes, formal or informal between Robin Hammeal-Urban relating to this Title IV Matter to and from Bishop Ian Douglas

- d. any and all documentation including emails, notes, formal or informal between Robin Hammeal-Urban relating to this Title IV Matter to and from, or about any Panel in this Matter or with any Panel Member
 - e. all of her communications with the Reference Panel, Conference Panel and/or the Hearing Panel in this Matter.
 - f. a list of all the people regarding this Title IV Matter that Robin Hammeal-Urban spoke to either in person or on the telephone or via zoom or was present for any interview and all of her notes formal and informal pertaining to same.
7. A complete list of every person that you or James spoke to regarding this Matter, including the Date, and whether that conversation was in person, via zoom, or on the telephone.
8. The Emails referred to in your or James notes from [REDACTED].
9. The credentials that [REDACTED] has for diagnosing Fr. Samuel as a Narcissist
10. The Document referred to by Ann Baldassare in her email dated May 17, 2022 where she states she saw a document that she stated “father called people who did not agree with him white supremacist”
11. Video Interview of Scott Colvin and notes relating to same
12. Video Interview of Sunhwa Chapman and the notes relating to same
13. The Text Messages referred to in Bill T’s video.
14. A copy of the retainer Agreement between the Investigator, James Allison and the Diocese.
15. From Bishop Laura Ahrens
- a. any and all of her documents including emails, notes, formal or informal relating to this Title IV Matter that she has not already produced;
 - b. any and all of her documents including emails, notes formal or informal relating to the 2017-2018 allegations that she has not already produced;
 - c. any and all documentation including emails, notes, formal or informal between Bishop Laura Ahrens relating to this Title IV Matter and to and from Bishop Ian Douglas; and to and from Robin Hammeal-Urban and to and from Alison Hollo
 - d. any and all documentation including emails, notes, formal or informal between Bishop Laura Ahrens relating to this Title IV Matter to and from, or about any Panel in this Matter or with any Panel Member
 - e. all of her communications with the Reference Panel, Conference Panel and/or the Hearing Panel in this Matter.
 - f. a list of all the people regarding this Title IV Matter that Bishop Laura Ahrens spoke to either in person or on the telephone or via zoom or was present for any interview and all of her notes formal and informal pertaining to same.

16. From Alison Hollo

- a. any and all of her documents including emails, notes, formal or informal relating to this Title IV Matter;
- b. any and all of her documents including emails, notes formal or informal relating to the 2017-2018 allegations;
- c. any and all documentation including emails, notes, formal or informal between Alison relating to this Title IV Matter to and from Bishop Ian Douglas; and Robin Hammeal-Urban and Bishop Laura Ahrens
- d. any and all documentation including emails, notes, formal or informal between Alison Hollo relating to this Title IV Matter to and from, or about any Panel in this Matter or with any Panel Member or cc'd on by anyone.
- e. all of her communications with the Reference Panel, Conference Panel and/or the Hearing Panel in this Matter.
- f. a list of all the people regarding this Title IV Matter that Alison Hollo spoke to either in person or on the telephone or via zoom or was present for any interview and all of her notes formal and informal pertaining to same.

17. From Complainants and Witnesses

- a. any and all emails and texts and other information as was requested in your June 7, 2022 Email to me

THE REVISED DISCOVERY PLAN AND SCHEDULING ORDER

On October 14, 2022, I emailed to Rev. Shepley, President of the Hearing Panel, a revised Discovery Plan and Scheduling Order which was submitted as a jointly agreed to document by the Church Attorney and myself. You then responded to both me and Donald Allison with the following email, on October 19, 2022 at 1:25pm, stating

“Gentlemen,

I am in receipt of your request for an extension of discovery deadlines via your submission of the proposed amended scheduling order. I have concerns about several of the provisions contained therein in that the matter will have been outstanding for almost a year when your new proposed discovery date expires. Additionally, your proposal seeks to extend the date for the parties to propound interrogatories beyond that which I set in the decision on the motion to redact. Second, I am concerned about a provision in the order that compels the diocese to pay the costs of a transcript of any motion upon the request of either party. While I realize this was contained in the first Scheduling Order, it is my understanding that the Canons do not place that

burden on the Diocese. See Canon IV.13.8. (“A record of the hearing shall be made by such means as to enable the creation of a verbatim written transcript of the hearing.”). I am concerned about the delays (and costs) inherent in this provision. I do not have concerns if the parties to agree that receipt of a audio hearing of the proceedings is sufficient as was provided relative to last oral argument.

Given Respondent’s intent to file a motion to compel on outstanding issues regarding mandatory disclosure in the coming days, I would request that both parties address these discovery concerns above via their upcoming papers on the motion to compel. I will hear further argument on the proposed scheduling order at the scheduled time for oral argument on the motion to compel. Additionally, you will be provided a new schedule for the motion to compel shortly based upon the granting of Mr. Samuel’s request for a two -week extension on the Motion to Compel.

Faithfully,

The Reverend Joseph Shepley
Hearing Panel President (Exhibit 40 attached)

My reply to that email on October 24, 2022 at 1:34pm addresses your directive. My response states,

“Dear Rev. Shepley:

I am in receipt of your email dated October 19, 2022, in response to the joint proposed revisions to the scheduling Order and Discovery Plan. I am concerned that you are unilaterally advocating for one party over the other when it comes to the cost of transcripts for any motion filed. As you are aware and noted, this provision was in the prior Order which you signed. That provision was submitted jointly by me, as Counsel for the Respondent and Donald J. Allison, the Church Attorney in this matter. You are now in receipt of a proposed revised Discovery and Scheduling Order that has the same exact language regarding payment for transcripts as the first and now you are raising concerns because the Respondent is going to be filing a Motion to Compel. I remind you that you are the one who directed the Respondent to file such motion. Respondent is simply doing as you directed and filing a Motion to Compel.

However, now you are directing Respondent and Church Attorney to address your concerns of costs and delays in our respective papers and indicating that this issue will be added to the Oral Argument on Respondent’s Motion to Compel. I believe that this is improper as you are causing further cost to the Respondent while trying to backtrack on provisions previously agreed upon by both the Church Attorney and myself. Moreover, one of the reasons that we are experiencing Discovery delays is because Bishop Ian Douglas has withheld providing Mandatory Disclosure information despite a request to him made by the Church Attorney back in in June or July., although I am told by the Church Attorney that Bishop Douglas is now cooperating with his request.

Your unilateral advocating for the Diocese, raises great concern as the Hearing Panel is supposed to be functioning as a body independent of influence from the Diocese or anyone else subject to the Authority of the Canons. Canon IV.19.11 states, “No person subject to the authority of the Church may attempt to coerce or improperly influence, directly or indirectly, the actions of any body performing functions under this Title, or any member of such body or any other person involved in such proceedings.”

My Concerns go beyond this email. In his reply papers in support of the Church Attorney’s Motion made to remove [REDACTED] as a Complainant in this Matter, the Church Attorney offered, and the Respondent accepted having the two (2) depositions and up to 20 interrogatories as if [REDACTED] were still a Complainant. Despite that concession, and acceptance of same, the Hearing Panel in this Matter decided to grant only one deposition and up to 20 interrogatories to Respondent in its Opinion dated October 4, 2022.

I would remind the Hearing Panel and you as the President of the Hearing Panel that you are an independent body and it is not the job or responsibilities of the Hearing Panel to unilaterally advocate for the Episcopal Diocese of Connecticut. It is of concern that despite agreement by the Church Attorney and me as Counsel for the Respondent, it appears as though the Hearing Panel is favoring one parties’ interest over the other.

Furthermore, you have referred to my client as Mr. Samuel in your email. I am concerned that this shows bias against the Rev. Amjad J. Samuel. Please advise as to why you would refer to my client as Mr. and not “The Reverend.”

Finally, I have not received the new schedule for the filing of the Motion to Compel as stated in your email.

Faithfully,

Michael” (Exhibit.41 attached)

As far as the President of the Hearing Panel’s concern about delays in this Matter, I would remind the Hearing Panel that despite the statement from the Church Attorney, which I believe was made in good faith by Mr. Allison, that Bishop Douglas was going to cooperate and finally produce Mandatory Disclosure documents, to date I still have nothing from the Bishop.

Once again it has been over six months past the date of April 26, 2022, for Mandatory Disclosures to be produced and the Church Attorney’s client, the Episcopal Diocese of Connecticut still has not fully complied with Canon IV.13.5.a. Because of the severe delays in

receiving documents Respondent and I will need time to examine those documents when they do arrive from Bishop Douglas and when the information on the outstanding Mandatory Disclosure list hereinabove is submitted to me. It is far better that things are done fairly and correctly over simply trying to push through unprepared to the disadvantage of Respondent.

Regarding the costs associated with the transcripts, twice now, the Church Attorney and I as Counsel for the Respondent have agreed regarding the cost of transcripts in this matter. The first Order with such language was signed by you as the President of the Hearing Panel.

Canon IV.13.8 states in pertinent part, “A record of the hearing shall be made by such means as to enable the creation of a verbatim written transcript of the hearing.”

Canon IV.15.6 of Appeals states in pertinent part,

“**Sec. 6.** It shall be the duty of the Hearing Panel to produce the record on appeal, consisting of a transcript of the proceedings before the Hearing Panel together with documentary and tangible evidence received by the Hearing Panel. The record shall be printed or otherwise reproduced as authorized by the President of the Court of Review.”

Additionally, the Canons appear to support that premise as well. Therefore it is logical that if the Hearing Panel is responsible for producing a transcript then, and the Church Attorney and Counsel for the Respondent have agreed that the Diocese will pay for the transcripts now, I am not sure why except as detailed in my email response above that the President of the Hearing Panel is expressing concern for the cost as agreed upon in the jointly submitted revised Discovery Plan and Scheduling Order.

Conclusion

The Canons of the Episcopal Church exist for a reason. Unfortunately, in this Title IV Matter, from the very beginning, there have been multiple canonical violations from the Bishop’s

Office, Robin Hammeal-Urban, down to the improper appointment of the “investigator” to the Church Attorney, to all of the Panels improper interaction with witnesses and Diocesan staff in this matter to convey information to the Church Attorney, Respondent, Respondent’s Counsel and Respondent’s Advisor as well as others on their behalf and possibly for other reasons as well.

Additionally, throughout this entire Title IV process, Respondent has been subjected to a shocking number of incidences of misconduct by the Diocesan Leadership which have been well documented often in their own documents. The Respondent has been exposed to the most documented misconduct by Diocesan Leadership I have ever seen in a Title IV process.

Accordingly, based upon the foregoing, Respondent respectfully requests that the Hearing Panel, enter an Order dismissing this Title IV Matter in its entirety as the Respondent has been caused irreparable harm by the multiple Canonical violations and gross misconduct committed at every stage of the Title IV process making it impossible for Respondent to get a fair Hearing.

Faithfully,
Michael F. Rehill
Michael F. Rehill J.D., D.D.
Counsel for Respondent

cc: Donald Allison, Church Attorney
The Rev. Amjad J. Samuel, Respondent
Dr. Pamela L. Lutz, LL. D., Advisor to Respondent