

## JOINDER in and Adoption of Complainants' Motion for an Interim Order

By this pleading in my role as the "Church Attorney", I join in, and adopt as my own motion to the extent necessary, Complainants' Motion for an Interim Order requiring Bishop Bruno to allow the congregation and community to return to St. James the Great during the pendency of this Title IV case.

I have now reviewed this extensive record, including submissions and exhibits, interviewed several key witnesses and complainants, visited the Church complex and reviewed the Motion for an Interim Order.

The continued lockout of over 100 loyal parishioners and clergy of the St. James Church building makes no sense. Although I viewed the Church campus only from the exterior, its beauty, functionality and relative youth are obvious. The phenomenal growth from nothing in 2013 to a thriving parish of over 100 parishioners that was virtually financially self-sufficient and conducted several important ministries was incredible. It was exactly the kind of growth the Episcopal Church should welcome and encourage. To lock these people out after the work they put in and the money they donated to achieve these results sent exactly the wrong message to any observer of the Episcopal Church.

To allow it to continue makes matters worse. More than a year after the lockout, parishioners continue under very difficult circumstances to conduct church services and ministries in other buildings and public parks. There is no pending sale, the ongoing civil litigation will make any sale impossible until it is finished, and the apparent hostility of the City Council and regulatory hurdles will make any lucrative sale unlikely.

The Episcopal Church can only gain by giving these loyal Episcopalians the opportunity, at no cost to the diocese, to continue to grow the parish and its ministries and use the Church. The risk-benefit analysis of a sale should be conducted by the hearing panel at the conclusion of the Title IV proceedings (possibly with the advice of a neutral third party). In the meantime, the closed, locked up building and the attendant adverse publicity, combined with the actual functioning of the parishioners and the church activities, is an awful disconnect and inconsistent with Episcopal Church values.

### Conclusion

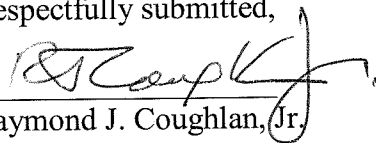
The Episcopal Church should not be in the position of rejecting and locking out loyal Episcopalians from their church building. The Episcopal Church is a welcoming, inclusive church. The lockout is the opposite.

The Episcopal Church should not be in the position of suing a donor, namely, the Griffith Company, which gave the land for Church purposes in 1945. It is especially troubling that the lawsuit seeks punitive damages in retaliation for the donor merely expressing its legal opinion. The damage to the Episcopal Church from such conduct could be catastrophic.

The Episcopal Church should not support waste. Keeping a beautiful consecrated church unused for no reason is waste.

The intentional refusal to provide pastoral care to the loyal group of parishioners is inconsistent with Episcopal principles. In this regard I attach the statement of the Reverend Doctor Ellen Hill, a witness I have interviewed. Her obvious anguish over the situation, and the clarity of her testimony/statement, capture better than any legal argument the need to reopen the Church building.

Respectfully submitted,

 8/25/16  
Raymond J. Coughlan, Jr.

STATEMENT OF ELLEN HILL  
AUGUST 26, 2016

My name is the Reverend Doctor Ellen Hill. I was ordained in 1988 in the Diocese of Los Angeles and have served both as an Associate Rector and as the Rector of a parish. I am now retired and a member of another parish in this Diocese.

I have, however, known the Reverend Canon Cindy Evans Voorhees since before her ordination. Canon Voorhees is widely respected in the Diocese, having been elected to the Standing Committee, during which time she served as its president and oversaw the approval process of the election of two suffragan bishops, one openly gay. She is currently serving her second elected term on the Board of Directors of the Corporation of the Diocese and she has also served as an elected delegate to the General Convention.

I live in the Newport Beach/Irvine area and, when Canon Voorhees was appointed as the vicar of St. James the Great, I offered to help her grow the congregation, as she had neither staff nor funds. From the beginning, it was an exciting endeavor, as the enthusiasm of the growing congregation was infectious. In particular, I encouraged people I knew who were looking for a church home to try St. James the Great. A number of them not only found their way there but also became very involved in the congregation.

On occasional Sundays I would attend St. James the Great and by chance happened to be present on May 17, 2015, when the Bishop announced that he had sold the church and that the congregation would be able to find places to worship in other Episcopal churches in the area. This message was delivered to the vicar and a congregation that in eighteen months grown from virtually nothing to one averaging Sunday attendance of 160, a budget of \$550,000, which was on track for the year and which had money in the bank, and 82 persons confirmed, received or reaffirmed.

There are no words graphic enough to describe the shock experienced by anyone who was there that Sunday. People whom I had encouraged to explore St. James the Great as their church home came up to me that morning and asked me to explain to them how this could happen in the Episcopal Church with no warning. What was the process, was there any recourse? Since I was a long-time resident of the community, these questions with which I was faced that morning grew more widespread after the congregation was locked out of the church, as throughout the community people sought to understand why the Episcopal Church would take action like that against a growing congregation. I have not been able to answer those questions.

All persons ordained as priests in the Episcopal Church are called to care alike for young and old, strong and weak, rich and poor. During the ordination of a Bishop, the bishop-elect vows he or she will interpret the Gospel of Christ, be a faithful pastor and wholesome example for the entire flock of Christ, and as chief priest and pastor encourage and support all baptized

people in their gifts and ministries. The actions Jon Bruno has taken in relation to the congregation of St. James the Great Newport Beach have been completely contrary to those vows. Furthermore, the Gospel calls us to live in right relationships with all persons and to use the life and ministry of Jesus Christ as our exemplar.

Although I have tried I have not been able to reconcile the behavior exhibited by Jon Bruno toward this congregation with what the Gospels tell us Jesus would want us to do. It was with considerable pain that I became a signatory to the presentment because as a priest in Christ's holy church I cannot in good conscience justify or explain the actions taken against St. James the Great by our Diocesan Bishop.