



EPISCOPAL
DIOCESE
of Southern Virginia

IN THE TITLE IV DISCIPLINARY MATTER
INVOLVING THE RT. REV. JON BRUNO,
RESPONDENT

TO: The Rt. Rev. Jon Bruno, Respondent
The Rt. Rev. Robert Fitzpatrick, Respondent's Advisor
Richard Zevnik, Respondent's Counsel
R.J. Coughlan, Jr., Church Attorney

COPIES TO: William F. Kroener, Lead Representative of Complainants
John M. Seitman, Complainants' Advisor
Richard J. Hoskins, Participant

NOTICE

Pursuant to Episcopal Church Canon IV.13.2, the Hearing Panel hereby notifies all recipients as follows:

- (1) The Hearing Panel will convene, at a date and location to be identified in a later communication, in order to hear testimony and argument and review documents and other exhibits that will inform the Panel as it renders its decision in this matter.
- (2) The Written Statement prepared by the Church Attorney in this matter, with attachments, is **attached hereto**.
- (3) The Respondent must file with the Hearing Panel a written response to this Notice within 30 days of the date of this Notice.
- (4) Episcopal Church Canon IV.19.6 provides as follows:

In any proceeding under this Title in which the Respondent fails to appear before the Conference Panel as required by Canon IV.12.4, or to appear before the Hearing Panel as required by Canon IV.13.2(a), or to file in a timely manner with the Hearing Panel the written response required by Canon IV.13.2(c), such Panel may, in its discretion, proceed in the absence of the Respondent. In proceedings under this section, such panels may consider the materials described in Canon IV.12.1, and any other types of evidence whose use is permitted in proceedings conducted before such Panels. The failure of a Respondent to appear, or to fail to file a written response, as described in this Section shall not, in itself, provide the basis for a finding that any Offense has been committed, other than any Offense specifically arising from such failure to appear, or failure to file.

ISSUED BY THE HEARING PANEL THIS DATE, JULY 1, 2016:

The Rt. Rev. Herman Hollerith IV, Convener
The Rt. Rev. Nicholas Knisely
The Rt. Rev. Michael Smith
The Rev. Erik Larsen
Ms. Deborah Stokes

Your written response to this Notice may be sent to the Convener at hhfour@gmail.com.

Please acknowledge receipt of the Notice by replying to this email.

STATEMENT OF ALLEGED OFFENSES

In the Matter of Allegations to be Considered by a Hearing Panel under Title IV of the Canons of The Episcopal Church on a Complaint by:

William F. Kroener, III, and
Certain Other Members of St. James the Great Church, Newport Beach, California, and
Certain Clergy and Lay Persons in the Diocese of Los Angeles
(the "Complainants")

against

The Right Reverend J. Jon Bruno, Bishop of the Diocese of Los Angeles
(the "Respondent")

The Complainants allege facts which may be violations by the Respondent of one or more of the following Canons:

Canon IV.4.1(h)(6), Conduct involving dishonesty, fraud, deceit or misrepresentation

Canon IV.4.a(h)(8), Conduct unbecoming a Member of the Clergy

and

Canon IV.4.1(g), Failure to exercise his ministry in accordance with the applicable provisions of the Constitution and Canons of the Church, specifically Canon II.6.3 requiring the consent of the Standing Committee to dispose of a consecrated church for worldly or common use without the previous consent of the Standing Committee

Background: In 2013 title to the real property of St. James the Great Church was awarded to the Corporation of the Episcopal Diocese of Los Angeles and the Respondent reinaugurated St. James the Great as a Mission Church in the Diocese of Los Angeles, with The Rev'd Cindy Evans Voorhees as its Vicar. In 2009, title to the real property of St. James the Great Church was transferred from the Diocesan Corporation to the Respondent as a California Corporation Sole. The Complainants allege that the Standing Committee's approval of this 2009 transfer to the Corporation Sole was conditioned on the property not being sold for non-religious use if there was a viable congregation at the location.

During the period after St. James the Great was reinaugurated and until May 17, 2015, the Respondent supported and encouraged the growth and development of St. James the Great and spoke optimistically of its future, without disclosing that he planned to sell the church property and close the church, and was negotiating a contract to sell the property. On May 17, 2015, the Respondent announced to the congregation of St. James the Great that he had agreed to sell the St. James the Great real property for non-church development, but stated that he would permit a leaseback of the church property until October 2015 and that the Diocese of Los Angeles would provide financial support for St. James the Great during the leaseback period. On or about June 29, 2015, the Respondent, without advance notice to the clergy or congregation of St. James the Great, caused the locks on the doors to St. James the Great to be changed and deprived the clergy and congregation of access to the real property and their personal property thereon.

Factual Allegations of alleged Canonical Offenses:

1. The Respondent failed to obtain a valid consent of the Standing Committee of the Diocese of Los Angeles to the sale of the St. James the Great real estate for worldly or common use as required by Canon II.6.3.
2. The Respondent misrepresented to the clergy and congregation of St. James the Great and the local community in various communications prior to May 17, 2015, his plans for the future of St. James the Great.
3. The Respondent misrepresented in various communications in May and June of 2015 that St. James the Great was not a sustainable congregation.
4. The Respondent misrepresented on or about June 17, 2015 that the Vicar of St. James the Great, the Rev'd Cindy Evans Voorhees, had resigned her position as Vicar of St. James the Great.
5. On or about May 17, 2015 the Respondent misrepresented to several members of St. James the Great that the church could have the use of the church property until October 2015 under a leaseback, and that the Diocese would provide financial assistance for the congregation during that leaseback period.
6. The Respondent acted in a manner unbecoming a clergyperson by (a) misleading and deceiving the clergy and people of St. James the Great and the local community as to his plans for St. James the Great and (b) summarily taking possession of the real and personal property of St. James the Great on or about June 29, 2015.

Additional information supporting these factual allegations is included in the attached appendices, as follows:


Appendix A – Report of the Intake Office, The Rt. Rev'd F. Clayton Matthews, dated July 15, 2015, with its attachments, including the original Compliant dated July 6, 2015 and a supplemental Complaint dated July 14, 2015.

Appendix B – Email from Mr. Kroener to Bishop Matthews dated August 17 2015 stating an additional supplemental Complaint.

Appendix C – Email from Mr. Kroener to Bishop Matthews dated January 10, 2016 stating an additional supplemental Complaint.

Respectfully submitted to the
Conference Panel,

Date: June 24, 2016



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