

# **EXHIBIT B**

**Affidavit of Mary Rose Murray**

**dated June 27, 2018**

**RECEIVED**

**Sep 01 2022**

**S.C. SUPREME COURT**

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )

AFFIDAVIT

Personally appeared before me Mary Rose Murray. I am over the age of 21 years and I reside at 2042 Dogwood Road, Charleston, SC 29414. I am currently the proprietor of Charleston Mobile Bookkeeping which I have operated since June, 2008. My certifications are: (1) American Institute of Professional Bookkeepers (AIPB); (2) Quickbooks Online; and (3) Quickbooks Desktop.

From June 1, 1987 until March 14, 2008 I was employed by Old Saint Andrews Parish Church at 2604 Ashley River Road, Charleston, South Carolina. My positions there were: Administrator, the Rector's Personal Secretary, and Controller. When I began my employment at the Church the Rector was The Reverend George Tompkins, III who served until his retirement in March, 2006. Father Tompkins' successor as Rector was the Reverend Marshall Huey who arrived in October, 2006.

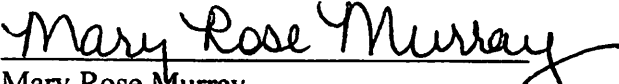
My position required me to maintain the parish records, including the parish governing documents and all the financial records, which were kept in a separate file cabinet at the parish offices for the current year and then stored in boxes. The parish register, which has records of important events such as marriages, baptisms, confirmations, membership transfers, etc., was kept in a large safe in a separate room. The governing documents of the Parish such as the Constitution, Canons, and By-laws were also kept in the safe. I was one of about five parish leaders, including the Rector, who had access to the safe.

When Hurricane Hugo occurred in September 1989, I was instructed by the parish

leadership to back up all important parish records from a floppy disk onto my personal computer. The documents I saved are still on the same computer I had then.

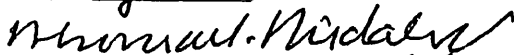
At the request of Father Michael Shaffer, a Priest of The Episcopal Church in South Carolina, I retrieved on June 11, 2018, all backed up records from my computer including all copies of the Constitution, Canons and By-laws I had stored on my computer. Among the documents I retrieved from the computer is a copy of Parish By-laws adopted at a Special Meeting of the congregation on May 24, 1992, a copy of which is attached hereto as an exhibit. I was requested to type the By-laws to be adopted at the 1992 meeting by the Rector George Tompkins. Father Tompkins informed me just after the meeting that the By-laws I had typed for him had been adopted at the meeting and asked me to place copies of the By-laws and other documents in the safe and in individual vestry members' folders.

Father Tompkins died on November 15, 2015. I have provided a copy of the 1992 By-laws to Father Michael Shaffer and Thomas S. Tisdale and they are attached to this affidavit.

  
Mary Rose Murray

SWORN to and subscribed before me this

27<sup>th</sup> day of June, 2018.



Notary Public for South Carolina

My Commission Expires: May 15, 2023

Notary (printed name): Thomas S. Tisdale

**Exhibit A.**

**Parish By-laws**

SAINT ANDREW'S PARISH CHURCH  
CHARLESTON COUNTY, SOUTH CAROLINA

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CONSTITUTION and CANONS

ARTICLE I

Saint Andrew's Parish Church in the Diocese of South Carolina accedes to and adopts the Constitution and Canons of the Episcopal Church in the United States of America, and the Constitution and Canons of the Diocese of South Carolina, and, accordingly, acknowledges the authority of the same.

ARTICLE II

The Rector, Wardens, Vestry, and Congregation hereby resolve that should any future changes be made in the Constitution and Canons of the Episcopal Church in the United States or those of the Diocese of South Carolina which may then conflict with any article herein contained, this Constitution and these Canons shall be deemed automatically changed to conform with the national and diocesan constitution and canons.

ARTICLE III

*Of the Name of the Church*

The name of this Church shall be "Saint Andrew's Parish Church, Charleston County, South Carolina." It shall be a part of the Episcopal Church in the United States of America. The Parish was first established under the Church Act of 1706, enacted and ratified by the Assembly on Saint Andrew's Day, November 30, A.D. 1706; enacted, ratified, and for ever confirmed by John Lord Granville, Palatine, and the rest of the true and absolute Lords Proprietors July 30, 1707; incorporated by the General Assembly under Act No. 1289 of the Acts of 1785, enacted March 24, 1785 (4 Stat. 703), after independence from Great Britain was achieved.

ARTICLE IV

*Of Membership*

All persons who have been baptized with water in the Name of the Father, and of the Son, and of the Holy Spirit, whose names are recorded in the parish register, and who attend the services of this Parish Church, shall be members thereof.

ARTICLE V

*Of the Qualifications of Voters*

1  
2 Members of Saint Andrew's Parish Church who have been confirmed or received  
3 into this church, having attained to the age of seventeen (17) years or older, who are regular  
4 contributors to the support of this parish, shall be entitled to vote at any Parish Meeting.  
5

6  
7 **ARTICLE VI**  
8 *Of the Annual Meeting*  
9

10 **SECTION ONE.** There shall be an Annual Meeting of the members of the Parish  
11 for the election of Vestry members, Deputies to the Diocesan Convention, and for the transaction  
12 of such other business as may be brought before it, during the second week of January, or at such  
13 other time as the Vestry may deem suitable; *provided*, the hour is to be set by the Vestry and  
14 written notice of the date and time provided to the Parish at least ten (10) days prior to the  
15 meeting.  
16

17 **SECTION TWO.** Special Meetings of the Parish may be called by the Rector at  
18 any time; and it shall be his duty to call such a meeting if requested to do so by a majority of the  
19 Vestry or by ten (10) voting members of the Parish, three (3) of whom must be members of the  
20 Vestry. The purpose, time, and date of the meeting must be made known in writing to the Parish  
21 at least ten (10) days prior to such meeting.  
22

23 **SECTION THREE.** Twenty-five (25) voting members of the parish, as defined in  
24 **ARTICLE V**, shall constitute a quorum.  
25

26 **SECTION FOUR.** The Rector shall preside at all Parish Meetings. If the Rector  
27 is unable to be present, or should the Parish be without a Rector, the Senior Warden shall  
28 preside; in the absence of both the Rector and the Senior Warden, the Junior Warden shall  
29 preside.  
30

31 **ARTICLE VII**  
32 *Of the Vestry*  
33

34 **SECTION ONE.** The Vestry shall consist of the Rector, if there be one, and  
35 twelve (12) voting members of the Parish who shall serve, upon election, for a term of three  
36 years. Four members of the Vestry shall be elected each year. No member of the Vestry shall be  
37 eligible to succeed himself in office until a space of one (1) year has elapsed after the expiration  
38 of the previous term in office. Any qualified voter, as defined in **ARTICLE V**, having reached  
39 the age of eighteen years (18) or older, who has communed at least thrice in the year preceding,  
40 and who contributes regularly to the support of the Parish, shall be eligible for election to the  
41 Vestry. If called upon to do so, the Rector or Senior Warden shall certify that any nominee to  
42 the Vestry meets these requirements.  
43

44 **SECTION TWO.** Vacancies occurring on the Vestry by reason of death,  
45 resignation, removal from the Parish, or otherwise, shall be filled for the remainder of the  
46 unexpired term or until the next Annual Meeting, whichever is sooner, by majority vote of the

1 remaining members of the Vestry. At the next succeeding Parish Meeting the said person elected  
2 by the Vestry shall be eligible to fill a full three year term, *provided* that the total term in office  
3 shall not exceed five (5) years.  
4

5 SECTION THREE. The Senior Warden, Junior Warden, Clerk of the Vestry,  
6 Parish Treasurer, and Assistant Treasurers (if there be any) shall be elected by the Vestry. The  
7 Senior Warden and Junior Warden shall be elected from among the members of the Vestry; the  
8 Wardens shall have attained the age of twenty-one (21) years. Officers shall be elected for a  
9 space of one year or until their successors shall be elected. The Wardens and Vestry thus  
10 elected, together with the Rector, if there be one, and if not, then themselves, shall constitute the  
11 Vestry, and shall be the official representative of the Parish.  
12

13 SECTION FOUR. In the event that a member of the Vestry misses three (3)  
14 consecutive meetings without providing prior written notification to the Vestry, or the Rector, or  
15 the Senior Warden, of the reason for the absence, the Vestry, by a majority vote of those present  
16 at the time the vote is taken, may declare said seat vacant. The vacant seat shall then be filled in  
17 accordance with the provisions in Section Two above.  
18

19 SECTION FIVE. All duly elected members of the Vestry shall take the following  
20 oath at the first meeting of the Vestry following their election:  
21

22 "I do solemnly swear and declare, that I will justly and truly execute the office  
23 and trust of Vestry Member of this Parish, according to the best of my skill,  
24 knowledge, and power, without prejudice, favor, or affection; so help me God  
25 through Jesus Christ."  
26

## 27 ARTICLE VIII

### 28 *Of Delegates to the Diocesan Convention*

29  
30  
31 SECTION ONE. The Congregation shall, at the appropriate Annual or Special  
32 Meeting, elect Delegates and their Alternates to the Diocesan Convention, the number to be  
33 prescribed by Diocesan Canon. Any member as defined in ARTICLE V shall qualify for  
34 election. In the event that it is found that those elected by this Parish cannot be present at the  
35 Convention, additional delegates may be elected after the last Service on the Sunday following  
36 the notification of insufficient representation, the said election to be held in the same manner as  
37 prescribed by the Constitution and Canons.  
38

39  
40 SECTION TWO. The Delegates so selected and their Alternates shall serve a two  
41 year term.

42 SECTION THREE. The Senior Warden and Junior Warden shall automatically  
43 serve as two of the Delegates.  
44

## 45 ARTICLE IX

### 46 *Of Delegates to Deanery Convocation*

1  
2 SECTION ONE. The Congregation shall be represented at meetings of the  
3 Deanery Convocation by the Senior Warden, the Junior Warden, and the Delegates to the  
4 Diocesan Convention duly elected in accordance with the provisions of Article VIII of the  
5 Constitution and Canons.  
6

7 SECTION TWO. The term of office is set as follows: the Senior Warden and the  
8 Junior Warden shall serve as long as each shall hold his or her respective office in accordance  
9 with the Constitution and Canons; and the two Delegates shall serve a two year term.  
10

11 ARTICLE X  
12 *Of Priests*  
13

14 SECTION ONE. There shall be a priest for the Congregation, styled "The Rector  
15 of Saint Andrew's Parish Church" who shall be entitled to receive a fixed salary from the Parish.  
16 The Rector shall be elected and invited to serve by the Vestry: but not without due regard to the  
17 ascertained wishes of the Congregation, and the advice and opinion of the Bishop of South  
18 Carolina. The election of a Rector requires a favorable vote of a majority of at least two thirds of  
19 the members of the entire sitting Vestry.  
20

21 SECTION TWO. Whenever the Rector shall deem it proper that services be  
22 performed in the Church, he may authorize the free use of the Church.  
23

24 SECTION THREE. The Rector shall cause to be registered in a book provided by  
25 the Vestry at the expense of the Parish, all Baptisms, Confirmations, Marriages, Burials,  
26 Transfers of Communicants into or out of the Parish, the rites of which have been solemnized by  
27 him or in this Parish by another Minister.  
28

29 SECTION FOUR. The Register so kept shall specify the name and date of birth  
30 of all persons baptized and the names of the parents and sponsors (in the case of an adult, the  
31 names of the witnesses). The Register(s) of this Parish shall not be opened to public inspection  
32 without the consent of the Rector, or one of the Wardens.  
33

34 SECTION FIVE. The Rector shall have complete charge of all worship and  
35 music in the Church, and he shall have the right to obtain such assistance as necessary to provide  
36 adequate music for the worship of the Church; *provided* that the Vestry shall fix all salaries or  
37 fees to be paid for the same.  
38

39 SECTION SIX. The Rector shall be the ecclesiastical superior for all Lay  
40 Readers of the Parish, and shall supervise their training, review their reports, and establish such  
41 requirements for their service as he shall deem appropriate.  
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44 ARTICLE XI  
45 *Of the Amendment of the Constitution and Canons*  
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No alteration, amendment of, or addition to this Constitution or Canons shall be made unless the same be proposed at least fifteen days prior to the Annual or Special Congregational Meeting, and due notice be given to the Parish of a proposed change. Only a majority vote of those present and eligible to vote under ARTICLE V shall be sufficient for passage.

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**CANONS or BY LAWS**

**CANON I. DUTIES OF THE VESTRY**

**SECTION ONE.** The Duties of the Vestry shall be those outlined in CANON VII of the Canons of the Diocese of South Carolina. Additional duties and requirements follow:

**SECTION TWO.** The Senior and Junior Wardens shall be elected by and from the Vestry. The Clerk, Treasurer, Assistant Treasurers, shall be elected by the Vestry but need not be members of the Vestry. Officers are elected for a term of one year or until their successors are elected.

**SECTION THREE.** The Rector shall preside at meetings of the Vestry and shall be a member ex-officio of all committees. In the absence of the Rector, one of the Wardens shall preside in order of seniority.

**SECTION FOUR.** The Senior Warden shall be Chairman of the Finance Committee, as defined in these Canons. In the Rector's absence, the Senior Warden serves as senior administrative officer and acting ecclesiastical authority of the Parish.

**SECTION FIVE.** The Junior Warden shall be next in seniority as officer of the Parish. He shall serve as Chairman of the Buildings Committee, as defined in these Canons.

**SECTION SIX.** Regular meetings of the Vestry shall be held each month, notice of such meetings to be given to the Parish at least seven (7) days prior to the meeting. Special meetings of the Vestry may be called by the Rector at any time, or, in his absence, by the Senior Warden. It shall be the duty of the Rector, or if there be none, of the Senior Warden, to call a special meeting of the Vestry if requested in writing to do so by five (5) members of the Vestry. A quorum for any meeting of the Vestry shall consist of seven members. The term Vestry shall apply to the Rector and elected vestry members.

**SECTION SEVEN.** The Clerk of the Vestry shall keep the minutes of the Vestry and conduct the correspondence of the Vestry. The Clerk shall sign and affix the Parochial Seal to all written contracts and obligations authorized by the Vestry on behalf of the Parish. The Clerk will give each member of the Vestry due notice of all meetings to be held.

**SECTION EIGHT.** The Treasurer shall collect and receive all monies due and belonging to the Parish and shall have custody in trust for the Parish of all funds, securities, and title deeds thereof. The Treasurer shall keep regular accounts of all transactions, monthly to be laid before the Vestry, and shall faithfully deliver into the hands of his successor all books, papers, and funds relative to and belonging to the Parish which may be in his keeping. The Finance Committee shall set up a standing operating procedure for the Treasurer and his assistants covering the collection and distribution of all funds, and the maintenance of surety

1 bonds, the premium of said surety bonds to be paid by the Parish. Such procedures are to be  
2 approved by the Vestry, and a copy filed with the original of this Constitution and Canons.  
3

4 SECTION NINE. The Vestry shall be empowered to make such transactions and  
5 regulations and to appoint additional temporary committees as it may deem expedient for the  
6 pursuit of its business, *provided* that no such actions conflict with this Constitution and Canons.  
7

## 8 9 CANON II. COMMITTEES

10  
11 There shall be six (6) standing Committees of the Parish to be known as The  
12 Finance Committee, Buildings Committee, Grounds Committee, Music and Worship Committee,  
13 Christian Education Committee, and Cemetery Committee. Other temporary committees may be  
14 established by the Rector with the approval of the Vestry; and the Rector shall outline the duties  
15 of such committees. Committees shall be appointed for a period of one year and may be  
16 renewed by the Vestry if deemed necessary. All committees are subject to the direction of the  
17 Vestry.  
18

### 19 *The Finance Committee*

20  
21 The Finance Committee shall exercise general supervision over the financial affairs of the  
22 Parish. It shall prepare a proposed budget indicating the estimated income and expenses of the  
23 Parish for the ensuing fiscal year and submit the same to the Vestry for consideration and  
24 approval. It shall make or cause to be made at least once each year an audit of parochial  
25 financial records and the accounts of the Treasurer. In the event that a change in Treasurers be  
26 made, such audit shall take place prior to the change. This committee shall also review all  
27 properties, deeds, titles, etc., belonging to the Parish, and at least once each year shall make a  
28 report to the Vestry on the condition of the same. The Senior Warden shall serve as Chairman of  
29 the Committee, and the Treasurer shall be a member. In the absence of a Rector, the Senior  
30 Warden shall also serve as almoner of the Parish.  
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### 32 *Buildings Committee*

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34 The buildings Committee shall be responsible for all buildings and furnishings of the  
35 Parish. All buildings, fittings, memorials, donations, and furnishings shall be kept in repair and  
36 adequately insured against loss, theft, and fire. All hazards shall be removed and unserviceable  
37 furnishings shall be disposed of. The Committee shall see that adequate personnel are engaged  
38 to keep the Church buildings clean and in order. The Junior Warden shall serve as Chairman.  
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*Grounds Committee*

This Committee shall be responsible for the maintenance, upkeep, and beautification of the Grounds of the Parish. A Chairman shall be appointed by the Vestry who shall meet with members of the committee to review, make recommendations, and implement a year round program of maintenance, upkeep, and beautification. The committee shall see that adequate personnel are engaged to maintain the grounds, and that the walkways and roads are serviceable.

*Music and Worship Committee*

This committee shall act as advisors to the Rector who is charged by Canon with control of music, worship, and spiritual jurisdiction of the Parish. A Chairman shall be appointed by the Vestry who shall meet with members of the committee. The Director of Music shall serve as a member of this committee.

The committee shall constantly evaluate and study the musical program of the Parish, rendering such assistance and making such recommendations as are deemed necessary to ensure a musical program of high quality as well as a worthy offering to Almighty God. At all times the music shall be such as assists the congregation in its worship, accords with the book of Common Prayer, and is authorized by the rubrics or the General Convention.

This committee shall constantly review, evaluate, and study all forms of worship used in the Parish, making such recommendations as are necessary to ensure a meaningful and dynamic liturgical life. Its members shall study, plan for, and evaluate special services. They shall participate in the development of and promote programs for Lay Readers and Acolytes, and perform such other studies and duties as assigned by the Rector or Vestry in accordance with the rubrics of the Book of Common Prayer or the directions of the General Convention.

*Christian Education Committee*

This committee shall act as advisor to the Rector in his efforts to see that the Christian Education Program meets the needs of all age groups. A Chairman shall be appointed by the Vestry who shall meet with the members of the Committee; the Director of Christian Education shall be a member. The Committee shall review all forms of Christian Education used in the Parish and make recommendations, evaluate, and assess the need for additional programs, as well as evaluate and assist in the program of the Church School. Further, it shall supervise any other programs involving the youth of the Parish, such as Episcopal Young Churchmen and any Scout programs sponsored by the Parish. It shall strive to improve the programs already in use and attempt to develop additional programs, especially for the youth.

1  
2 *The Cemetery Committee*  
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4 The Cemetery Committee shall be responsible for the sale of all cemetery lots, and the  
5 other business pertaining to burial privileges. A Chairman shall be appointed by the Vestry who  
6 shall meet with the members of the Committee to review and make recommendations for the  
7 maintenance needs of the cemetery. Together with the Grounds Committee, they shall maintain  
8 and care for the cemetery. All monies received or disbursed by the Committee shall go through  
9 the Treasurer of the Parish. The Committee shall prepare a set of standing regulations governing  
10 the cemetery, to be approved by the Vestry, a copy of which is to be filed with the original of  
11 these canons.  
12

13 Each Committee shall prepare yearly a proposed budget for presentation to the Vestry  
14 outlining the means it intends to use for the accomplishment of its responsibilities.  
15

16  
17 **CANON III. BURIAL PRIVILEGES**  
18

19 **SECTION ONE.** The purchase of burial privileges in the cemetery of Saint  
20 Andrew's Parish Church shall be limited to members as defined in ARTICLE IV who also are  
21 eligible to vote at the Annual Meeting as set forth in ARTICLE V.  
22

23 **SECTION TWO.** Upon application, the Vestry may, under extraordinary  
24 circumstances, and according to its own discretion, grant a waiver of these requirements.  
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28 As amended at a Special Meeting, May 24, 1992  
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30