THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

Case No. 2013-CP-18-00013

The Protestant Episcopal Church
in the Diocese of South Carolina et. al. . . . . Respondents,

v.

The Episcopal Church (a/k/a The Protestant
Episcopal Church in the United States
of America) and The Episcopal Church
in South Carolina . . . . . Appellants.

INITIAL REPLY BRIEF

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A. This is an action in equity, which mandates *de novo* review. The "main purpose" of the Respondents' suit was to enjoin The Episcopal Church and its loyalists from controlling the identities and other assets that the Respondents' are claiming.

i. This case is similar to other church disputes where the Court has followed the "main purpose" rule and declared the cases to be in equity.

De novo review is mandated in equity cases. *Lewis v. Lewis*, 392 S.C. 381, 386, 709 S.E.2d 650, 652 (2011). The "main purpose" rule is the test for distinguishing actions at law from actions in equity. *Verenes v. Alvanos*, 387 S.C. 11, 15-16, 690 S.E.2d 771, 773 (2010); *Doe v. S.C. Med. Malpractice Liab. Joint Underwriting Ass'n* , 347 S.C. 642, 645, 557 S.E.2d 670, 672 (2001) ("main purpose rule" determines the right to a jury trial).

The Court applied this analysis in *Williams v. Wilson* and *Bramlett v. Young*. The plaintiffs in *Williams* sought to determine who was entitled to lead the church, which would in turn settle who was entitled to control the church's assets. 349 S.C. 336, 339, 563 S.E.2d 320, 321 (2002). The *Bramlett* plaintiffs were Presbyterian loyalists who sued for possession of the church's property after the majority of the local church voted to leave the Presbytery. 229 S.C. 519, 527, 93 S.E.2d 873, 877 (1956). This Court declared both suits were equitable. *Bramlett*, because the suit's purpose was to reform a deed, declare a trust, and secure an injunction to prevent the schismatic group from interfering with the church property. 229 S.C. at 534-35, 93 S.E.2d at 881. *Wilson*, because the suit's aim was a declaratory judgment with an injunction. 341 S.C. 136, 140, 533 S.E.2d 593, 595 (Ct. App. 2000) (conclusion approved by this Court, 349 S.C. at 339-340, 563 S.E.2d at 322).

The same is true here. The Respondents asked to be declared owners of the church premises and for varied injunctions. They did not seek damages. (2dAm.Compl.,pp. 85-91).

ii. Although the *All Saints* opinion describes that case as an action at law, this appears to be contrary to these precedents.

All Saints notes that the case was tried to a judge not a jury. 385 S.C. 428, 441, 685 S.E.2d 163, 170 (2009). It then cites Rule 39(b), SCRCP, which describes trial procedure.

The test for distinguishing between law and equity does not focus post hoc on whether the case was tried to a judge or a jury. Indeed, the law or equity distinction determines the entitlement to a jury trial. *Verenes*, 387 S.C. at 15-16, 690 S.E.2d at 773. *Williams'* use of the main purpose rule has been favorably cited in the time since *All Saints*, see *Lewis*, 392 S.C. at 396-97, 709 S.E.2d at 658 (Toal, C.J., concurring), and the main purpose rule has been reaffirmed since *All Saints*. See *Verenes*, 387 S.C. at 16, 690 S.E.2d at 773. Again, the Court's decisions in *Williams* and *Bramlett* control.

iii. The suggestion that this suit sounds in law because it involves examining written instruments is contrary to precedent.

Respondents say this case is an action at law because it involves examining written instruments and relationships that are based on contract principles.

Breach of contract actions are usually actions at law, but this is because actions for breach of contract typically seek money damages. Other claims based on contracts—claims for specific performance, for example—sound in equity. *Ingram v. Kasey's Assocs.*, 340 S.C. 98, 105, 531 S.E.2d 287, 290 (2000). If the distinction between law and equity turned on whether the case required the court to examine a written instrument, an action to enforce

a restrictive covenant would be an action at law. It is not. *Buffington v. T.O.E. Enterprises*, 383 S.C. 388, 391, 680 S.E.2d 289, 290 (2009).

The Respondents also make a one-sentence claim that an express trust is a "contract issue" because whether a trust exists is a question of fact. That is not the test; the distinction between law and equity does not turn on whether a case raises any questions of fact. The main purpose rule controls, and as the title of the Respondents' complaint helpfully forecasts, (2d Am. Compl., p.1), the main purpose of this case was "declaratory and injunctive relief."

B. Even if the Court were to put First Amendment considerations to the side, the law still provides that the Respondents lose the vast majority of their case.

i. The Trustee Corporation's charter associates the Diocese with The Episcopal Church, and this is not surprising if one considers when the statute was enacted and the law that governs gifts to charities.

The General Assembly created the Trustee Corporation in 1880. (DSC 13). The statute contains words of association and geography. Section 1 of the Act identifies "The Protestant Episcopal Church for the Diocese of South Carolina," and it further speaks of appointing trustees for the purpose of holding property "for objects [uses] *connected* with *said* church *in said* Diocese." *Id.*

The Respondents say (and the trial court found) that this statute does not reference The Episcopal Church, but "said" church is a perfectly natural allusion to the "Protestant Episcopal Church," from earlier in the same sentence. This is the name the Church used at its first convention in 1789. See (D 425, p.1). The same was true in 1878, two years before the statute. (D 159, p.1). This is not a "forced" reading. It is the statute's plain language.

It is hardly surprising that the General Assembly wrote the statute this way. The Diocese had already given its unconditional accession to The Episcopal Church's Constitution and Canons in 1841. (Trial Tr.p.1815, l.18 - p.1816, l. 5-15). The Diocese claimed to leave the Church during the Civil War—oddly, the Respondents emphasize this as a proud point of "Diocesan independence"—but nobody contests that The Episcopal Church did not recognize this attempted secession (Trial Tr.p.2384, lines 18-24) and that the Diocese abandoned its stance by 1866. Thus, at the time of the statute's enactment, the Diocese was part of the larger body. Its identity was directly tied to The Episcopal Church.

All property that is donated to a charity is held in trust, and the terms of that trust are tied to the charity's purpose at the time of the donation in question. *South Carolina Dep't of Mental Health v. McMaster*, 372 S.C. 175, 182, 642 S.E.2d 552, 555-56 (2007). This is settled law, it has neutral application, and it ought to apply to the Diocese and the Trustee Corporation in the same way that it would apply to a secular charity. This means that The Episcopal Church and its true Diocese are the beneficial owners of all property that was donated to the Diocese or the Trustee Corporation before those entities tried to disaffiliate. Respondents never acknowledge this rule or dispute its application.

ii. The Episcopal Church's trademarks are valid and have superior status, yet the Respondents assert continued ownership over names that plainly cause confusion with the Church's marks and its brand.

The trial court never addressed the controlling effect of The Episcopal Church's federal trademark registrations, and both the trial court and the Respondents avoid any meaningful discussion of the touchstone in every trademark case: likelihood of confusion.

The Respondents sued for trademark infringement. *They* have to prove that their marks are protectable. State registrations are not evidence of this. A state registration is a *claim* of a mark's ownership and evidence that the mark has been registered, which is a perfunctory act. S.C. Code Ann. § 39-15-1125 (Supp. 2014).

The Episcopal Church's federal registrations, however, are prima facie evidence of the trademark's validity, ownership, and the registrant's exclusive right to use the trademark. 15 U.S.C. § 1115(a). Surely there is no need to cite authority for the proposition that if any of the Respondents' state trademarks cause confusion with The Episcopal Church's federal trademark registrations, the Respondents' marks are invalid. If authority must be cited, the South Carolina Code states so, quite plainly. See S.C. Code Ann. § 39-15-1145(3)(f) (Supp. 2014) (the Secretary of State shall cancel a registration if a court finds that the mark is so similar as to be likely to cause confusion with a federal registration). When Respondents filed for infringement, they put validity at issue.

Respondents' trademarks *do* cause confusion, and although the trial court seemed to lay this confusion at the Church's feet, confusion is still confusion, and the law explains that the Church's rights trump. The disorder is apparent when one considers the trial court's order in practical terms. The Episcopal Church's trademarks include the names "The Episcopal Church" and "The Protestant Episcopal Church in the United States of America." (Trial Tr.p.2306, line 2 - p.2307, line 10). The validity of these marks has not been questioned. Bishop Lawrence and his followers want to separate from The Episcopal Church, but they wish to conjure the Church's brand by using names such as "The Protestant Episcopal Church in the Diocese of South Carolina." That is highly misleading.

The trial court's decision is plainly erroneous. It attempts to avoid the clear application of trademark law by reasoning that injunctive relief is required by a criminal statute, S.C. Code Ann. § 16-17-310 (____) (see Or. p.38), but this statute cannot grant rights that are preempted by Federal Law, and the Lanham Act expressly preempts state laws that allow a party to infringe federally-registered marks. 15 U.S.C. § 1125(c)(6). The Appellants would also direct the Court's attention to the Fourth Circuit's decision in *Purcell v. Summers*, which arose out of South Carolina and contains several observations that are helpfully instructive. See 145 F.2d 979 (4th Cir. 1944). As *Purcell* explains, Respondents' names and symbols give the community the incorrect impression that the dissidents who have seized these organizations are the continuing body of The Episcopal Church. It does not matter that some of the Respondents predated The Episcopal Church. All of them acceded to The Episcopal Church's authority, and unless a court declares The Episcopal Church's marks invalid, the Church owns and controls this brand.

iii. The trial court provided no lucid explanation for why the corporate actions in question were valid. Its decision illustrates the error in suggesting that a religious organization's "civil" being is separate from its "religious" being.

The first recorded action that Bishop Lawrence and his followers took towards severing the Respondents from The Episcopal Church was Bishop Lawrence's amendment of the Diocese's charter on October 19, 2010. (DSC 009). This was apparently after the Standing Committee, purporting to act as the Board of Directors of the Diocese, voted to change the Diocese's purpose from operating under The Episcopal Church's authority to operating under its own authority. Compare *id.* with (DSC 64, p.1).

Neither the trial court nor the Respondents offer a lucid explanation of how the Standing Committee and Bishop Lawrence were authorized to take these actions. The Diocese's original corporate charter says that the corporation's purpose—its reason for existing—is to operate *under* The Episcopal Church's Constitution and Canons. (DSC 007) ("The purpose of said proposed Corporation is to continue the operation of an Episcopal Diocese under the Constitution and Canons of The Protestant Episcopal Church in the United States of America."). That Constitution and those Canons create the office of Bishop and mandate that every diocese have a Standing Committee. (D 203, pp.10, 12, 58). At no point do these authorities suggest that a Bishop or Standing Committee have the power to sever those offices from the church that created them.

It is telling that the Diocese did not try to adopt written bylaws until after these changes to the charter. The bylaws named Bishop Lawrence as the Diocese's "President" and the Standing Committee as the "Board of Directors." (DSC 6C, p.1). The out-of-sequence nature of these changes shows knowledge by Bishop Lawrence and his followers that the written bylaws, which tried to grant them powers after the fact, were inconsistent with The Episcopal Church's rules of governance. Again, the Diocese's original charter referenced an organization that was *under* the Constitution and Canons of The Episcopal Church. Amendments must be consistent with those rules in order to be lawful.

It is also telling that the trial court and the Respondents never mention Bishop Lawrence's ordination oath. All of Bishop Lawrence's authority was tied to his office, and Bishop Lawrence did not become Bishop until after he swore to follow The Episcopal Church's discipline. These "corporate actions" violated the oath, and the Respondents do

not identify any authority for Bishop Lawrence to take these actions absent his position as Bishop. The oath is important. When the Fourth Circuit considered whether The Episcopal Church was hierarchical (and decided that it *was*), the priest's oath was one of the three things the court noted in its decision. *Dixon v. Edwards*, 290 F.3d 699, 716 (4th Cir. 2002).

If it seems awkward and illogical to be separating Bishop Lawrence's "civil" authority from his "ecclesiastical" authority, that is because it *is* awkward to divide religious offices and institutions this way. The Appellants have attempted to give this Court an honest way to distinguish *All Saints* by acknowledging that *All Saints* did not address some of the arguments raised here. These arguments include, but are not limited to, the Respondents' long-standing history of accession to The Episcopal Church's authority *after* The Episcopal Church enacted the Dennis Canon and adopted a resolution stating "[w]hereas, the Episcopal Church is an hierarchical church, in which local parish churches are a part of, and are subject to, the Constitution and Canons of the Episcopal Church and of the Diocese in which they are geographically present." *Rector, Wardens, Vestrymen of Christ Church in Savannah v. Bishop of Episcopal Diocese of Georgia*, 718 S.E.2d 237, 251 (Ga. 2011) (*Christ Church II*). But candor requires the Appellants to concede that they disagree with the central premise of *All Saints*. Respectfully, the question of who constitutes the *true* Diocese cannot be separated from who controls the Diocese's corporate entity.

Drawing this sort of distinction is truly an invasion into church polity. As explained more fully in section C of this brief, corporate ownership decides more than title to church property; it decides ownership of the church's identity and the power to assert the church's authority. It is much more like litigating who has the right to lead a church than deciding

who gets the real estate when the majority of the members want to leave. It is an end-run around the First Amendment.

Respondents say that interpreting the corporate documents is similar to interpreting a contract. Fine. The Court interprets contracts by examining the intent of the parties, and often, the best expression of that intent is the language of the parties' agreement. *N. Am. Rescue Prods., Inc. v. Richardson*, 411 S.C. 371, 378, 769 S.E.2d 237, 240 (2015). Here, the record evidence shows that as a condition of being a part of The Episcopal Church's brand, Respondents pledged unconditional accession to The Episcopal Church's authority. The Diocesan canons required this for all parishes, (Trial Tr.p.1839, l. 22 - p.1840, l. 14), the Diocese pledged its own accession in 1841, (Trial Tr.p.1815, l.18 - p.1816, l. 5-15), and the Diocese's charter embodied this when it subordinated the Diocese's operation to The Episcopal Church's rules. A lot has changed in the time since this Court decided *Harmon v. Dreher* in 1843, but that case includes an observation on corporate charters that is still relevant today. *Harmon* explains:

> It has been argued that the majority of the congregation should govern; and that it would be a violation of liberty to deny a controlling influence to their determinations. If this were a Congregational Church, this might be true. But why? Because, if the congregation had been so incorporated, it would be according to the very terms of the association that the majority should govern. But if the incorporation of the church as a Lutheran Church, imports what has been stated in evidence, it would be a breach of all liberty as well as of faith, that the majority should impose a new contract upon the minority. Suppose a majority should next year spring up in favor of the Roman Catholic or Mohamedan Religion, and introduce auricular confession and indulgences, or the Koran, into this congregation, would not these defendants, however small a minority they might form, see and feel that their liberties were trampled on, by so gross a violation of the contract of association contained in their charter? The truth is, that liberty is violated wherever contracts are infringed; as much where the infringement consists in the provision of a

> charter, as where a majority of mercantile co-partners choose to make their will, and not their articles, the rule of their conduct; as much where the charter is to a Religious body, as where it is to a Civil corporation.
>
> The character of this corporation is, therefore, to be determined by the terms of the charter. The body created is a Lutheran Church. We have seen by the evidence what that means.

17 S.C. Eq. (Speers Eq.) 87, 123-24 (1843). The Diocese's charter includes an explicit reference to The Episcopal Church's rules. That reference has meaning. Any amendments outside those rules are void. The trial court erred in finding to the contrary.

C. Respondents' theory of neutral principles distorts their own history, the Appellants' arguments, and well-established precedent.

i. Respondents' recitation of Church history conspicuously omits evidence of their repeated unconditional accession to The Episcopal Church.

Respondents devote a significant portion of their brief to discussing their history of purported "independence" from The Episcopal Church, but their recitation is conspicuously thin after 1807. This is because in the years that followed, each Respondent made an unconditional accession to the Constitution and Canons of The Episcopal Church.

As explained more thoroughly in Appellants' opening brief, at least as early as 1822, the diocesan canons required that any new parishes seeking admission into the Diocese pledge conformity with and accede to the Constitution and Canons of the National Church. (Trial Tr.p.1839, l. 22 - p.1840, l. 14). This accession was forward-looking; it applied to the version of the constitution and canons "which are now or [which] hereafter may be enacted" by the General Convention. *Id.* The language of this canon did not change until 2008. (*Id.*p.1845, l. 8 - p.1846, l. 12).

In 1841, the diocesan convention voted unanimously to confirm, in the diocesan constitution, the Diocese's unconditional accession to the National Church. (Trial Tr.p.1815, l.18 - p.1816, l. 5-15). Indeed, it is not contested that each and every Respondent here—prior to the instant dispute—pledged unconditional accession to the National Church's rules, regulations, and governance, either directly or through the Diocese's accession canon. All but seven of the parish Respondents expressly did so after the passage of the Dennis Canon. See (Def's Mot. for Recons., pp.166-172).

Moreover, the oath taken by each priest serving in each parish and by Bishop Lawrence himself vows conformity and loyalty to the National Church's governance and worship. (Lawrence Depo.p.88). When Bishop Lawrence took his oath, the canons acknowledged the Church's hierarchical structure. (D 202, p.167, Canon IV.14.1).

Respondents and the trial court do not dispute any of this evidence. They just ignore it. In doing so, they overlook the U.S. Supreme Court's specific holding that it is not appropriate for a court to analyze a church's purported "early history" of "independence." *Serbian E. Orthodox Diocese for U.S. of Am. & Canada v. Milivojevich*, 426 U.S. 696, 721 (1976). The Respondents convinced the trial court to commit the same error the Illinois Supreme Court committed in *Milivojevich*. They seek to compound that error on appeal.

It is hardly surprising that Respondents are now claiming "independence." They would not be seceding if they believed otherwise. But precedent counsels that a post-dispute claim of independence is only of minimal, if any, value. The court's goal in a neutral principles analysis is to ascertain the parties' intentions with respect to the disposition of property *before* the dispute erupted. *Jones v. Wolf*, 443 U.S. 595, 606 (1979) ("At any time

before the dispute erupts, the parties can ensure, if they so desire, that the faction loyal to the hierarchical church will retain the church property."); *Presbytery of Greater Atlanta, Inc. v. Timberridge Presbyterian Church, Inc.*, 719 S.E.2d 446, 450 (Ga. 2011) ("our ultimate goal is to determine 'the intentions of the parties' . . . 'before the dispute erupt[ed]'"). What matters is the parties' conduct and intent before they were on opposite sides. Here, the best evidence of that conduct and intent is Respondents' unequivocal accession.

ii. The record conclusively demonstrates that The Episcopal Church is hierarchical.

The argument du jour presented by dissenting Episcopalians is that The Episcopal Church is hierarchical only from the "diocese down." This novel argument only began appearing after dissident parish leaders consistently lost their challenges in courts across the country. The original version of this argument was that The Episcopal Church was hierarchical only as to doctrine and not as to property. E.g., *Bennison v. Sharp*, 329 N.W.2d 466, 472 (Mich. Ct. App. 1982); *Diocese of Newark v. Burns*, 417 A.2d 31, 33 (N.J. 1980). This was a losing argument. *Bennison*, 329 N.W.2d at 427; *Diocese of Newark*, 417 A.2d at 33. Up until just recently, the dissenters relented and agreed The Episcopal Church is hierarchical generally, drawing no distinction between the relationship of a parish, a diocese, and The Episcopal Church (or doctrine versus property). E.g., *Christ Church II*, 718 S.E.2d at 240-41 (noting, in a case where The Episcopal Church was a party, that "[t]he parties agree that the Episcopal Church is a hierarchical religious denomination with a three-tiered, representative form of government"); *Protestant Episcopal Church in Diocese of Va. v. Truro Church*, 694 S.E.2d 555, 558 (Va. 2010) (stating, in another case where The Episcopal

Church was a party, that "[i]t is not disputed that the entities involved in this litigation are part of a hierarchical church").[1]

Only now has their tune changed. But the fact that in many prior cases the hierarchical structure of the church was undisputed simply shows the utterly obvious and unremarkable nature of that proposition.

The trial court and Respondents are therefore wrong when they say that the locus of control is with the Diocese, and Respondents err in arguing that examining the relationship between the Diocese and the National Church requires an improper and searching inquiry into church governance. To begin, in 1979 The Episcopal Church's General Convention adopted a resolution describing the whole denomination as "hierarchical." *Christ Church II*, 718 S.E.2d at 251. Because Respondents continued their accession after this point—*for years*—their current protests are conversions of convenience. The Episcopal Church's canons also expressly refer to the church as "hierarchical." (D 203, p.161, Canon IV.19.1); (D 202, p.167, Canon IV.14.1). Again, accession to these canons should settle this point.

Furthermore, the evidence adduced before the trial court consistently and overwhelmingly demonstrates that the National Church is the ultimate authority. Each of the

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[1]Here too, the dissenters lost their claims to church property with regularity. E.g., *In re Episcopal Church Cases*, 198 P.3d 66 (Cal. 2009); *Episcopal Church in Diocese of Conn. v. Gauss*, 28 A.3d 302, 325 (Conn. 2011); *Christ Church II*, 718 S.E.2d at 118; *Episcopal Diocese of Mass. v. Devine*, 797 N.E.2d 916, 923 (Mass. App. Ct. 2003); *Episcopal Diocese of Rochester v. Harnish*, 899 N.E.2d 920 (N.Y. 2008); *Daniel v. Wray*, 580 S.E.2d 711 (N.C. Ct. App. 2003); *In re Church of St. James the Less*, 833 A.2d 319 (Pa. 2003); *The Falls Church v. The Protestant Episcopal Church in the U.S. of Am.*, 740 S.E.2d 530, 540-42 (Va. 2013). But see *Masterson v. Diocese of Nw. Tex.*, 422 S.W.3d 594, 612 (Tex. 2014) (not ruling on this question, but remanding to the trial court to apply the neutral principles approach and holding *Jones v. Wolf* did not "establish substantive property and trust law that state courts must apply to church property disputes").

Respondents were required to and did in fact pledge unconditional accession to the National Church and likewise recognized the authority of the General Convention. The canons of the Diocese required this as a condition for admission, and that accession was forward-looking—it applied to all rules the General Convention had adopted and all acts the Convention would take in the future. (Trial Tr.p.1839, l. 22 - p.1840, l. 14). Every priest and bishop is and was required to make a personal vow of conformity and loyalty to the National Church's governance, which includes a disciplinary process wherein any ordained person can be disciplined for failing to comply with the National Church's rules. (D 202, p.125, Canon IV.1). Diocesan bishops can be ordained only with the consent of the larger church and can be removed pursuant to the National Church's disciplinary rules. (D202, p.10, sec. 2 & p.163, Canon IV.12.1). Beyond this, the National Church prescribes a mandatory form of worship for the whole denomination in the Book of Common Prayer, and its Constitution and Canons require that each diocese form a standing committee and set forth that committee's duties. This list could go on and on.

Not only is this the system of structure and governance mandated by the National Church, but it is the system each of the Respondents adhered to and followed until the underlying case arose. For example, each paid premiums to the National Church's pension fund and adopted new business practices prescribed by the General Convention, as they are mandated to do. (Trial Tr.p.251, ll. 19-25, p.1851, l. 8 - p.1852, l. 7). In 1922, the Diocese sought permission from the General Convention before dividing the previously state-wide Diocese into two separate geographical dioceses (resulting in the creation of the Diocese of Upper South Carolina). (Trial Tr.p.1833, line 13 - p.1835, line 4).

The trial court ignored this evidence, and Respondents offer nothing to counter it. To be sure, local parishes and individual dioceses retain a certain amount of autonomy, but that fact does not undo the hierarchical structure and nature of the entire denomination. Indeed, as nearly every court in the United States to address this issue has recognized, and as the trial court found and Respondents concede here, the diocese-parish relationship is hierarchical despite the undisputed fact that parishes retain a significant amount of autonomy from their dioceses in running their everyday affairs. Note also that while there is no provision in the National Church's Constitution forbidding dioceses from unilaterally withdrawing from the denomination—a fact the trial court here emphasized (Or. p.31)—it is equally true that no diocesan constitution expressly bars parishes from leaving their diocese, and yet nearly every court has decided they cannot, and the Diocese itself took that position in *All Saints*. Nor does any diocesan Constitution contain a "supremacy" clause, and the result is still the same.

At the end of the day, churches and dioceses are free to exercise their autonomy so long as their actions do not otherwise conflict with the rules, worship, and governance of the National Church. See (Trial Tr. p.1730, ll.4-21) (testimony from Bishop Daniels that a diocese's changes to its constitution and canons cannot conflict with those of the National Church). That is the hallmark of a hierarchical church, and it is readily apparent from even a cursory review of the record.[2] See *Bennison*, 329 N.W.2d at 473 (holding the hierarchical

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[2]A court cannot completely avoid examining church documents to make these determinations under the guise of the Establishment Clause, as Respondents suggest. "[C]ivil courts must examine the polity of the general church to determine whether it is hierarchical." *Gauss*, 28 A.3d at 312-13. Indeed, courts routinely look to these documents when ascertaining church governance. E.g., *Milivojevich*, 426 U.S. at 715-16; *Rector, Wardens & Vestrymen of Christ*

structure of The Episcopal Church "is apparent from a brief review of the church's polity and administration; no searching inquiry into church polity was necessary or made"). There simply is no other conclusion to draw from the record.

To avoid this result, Respondents contend that Appellants are collaterally estopped from arguing that the Church is hierarchical above the diocese level. They cite an Illinois decision, *Diocese of Quincy v. The Episcopal Church*, 14 N.E.3d 1245 (Ill. Ct. App. 2014).

This is quite an about-face. South Carolina has previously placed the burden on the challenger to prove a different organizational structure than the one commonly associated with a denomination. *Bowen v. Green*, 275 S.C. 431, 435, 272 S.E.2d 433, 435 (1980). The Respondents disclaimed that burden at trial and adopted the mantra that hierarchy was irrelevant, and the trial court largely barred this evidence. Having effectively deprived Appellants of the opportunity to properly litigate the issue below, Respondents now seek to prevail on it after the fact, a result that would challenge any notion of due process. For that reason alone, their effort should be denied.

Neither does *Quincy* bind this Court. The structure of the National Church vis-à-vis its South Carolina low country parishes and diocese was not litigated in that decision. Neither was the general question of the National Church's authority over all of its dioceses actually *decided.* The opposite is true: the court concluded the evidence before it was not clear and declined to rule on that issue. *Id.* at 1257. That case was then resolved by application of Illinois' Nonprofit Corporation Act and common law governing written

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Church in Savannah v. Bishop of the Episcopal Diocese of Ga., Inc., 699 S.E.2d 45, 48 (Ga. Ct. App. 2010) (*Christ Church I*); *Parish of the Advent v. Protestant Episcopal Diocese of Mass.*, 688 N.E.2d 920, 931-32 (Mass. 1997); *Truro Church*, 694 S.E.2d at 558-59.

agreements to unique facts involving the corporate charters of two diocesan entities and an agreement with an Illinois bank. Neither South Carolina law nor the facts in this case about the Diocese of South Carolina and the thirty-six respondent parishes were at issue there. Collateral estoppel therefore does not apply. See *Carolina Renewal, Inc. v. South Carolina Dep't of Transp.*, 385 S.C. 550, 554-55, 684 S.E.2d 779, 782 (Ct. App. 2009) ("The party asserting collateral estoppel must demonstrate that the issue in the present lawsuit was: (1) actually litigated in the prior action; (2) directly determined in the prior action; and (3) necessary to support the prior judgment."); see also *Carrigg v. Cannon*, 347 S.C. 75, 81, 552 S.E.2d 767, 771 (Ct. App. 2001) ("Even where all of the elements for collateral estoppel are met, it will not be rigidly or mechanically applied, and the application of the doctrine may be precluded where unfairness or injustice results, or public policy requires it.").

iii. Long-standing precedent limits the use of neutral principles of law when their application infringes a church's religious governance and administration.

As explained in Appellants' opening brief, the U.S. Supreme Court has expressly recognized that the neutral principles approach cannot be used to infringe upon ecclesiastical matters. See *Presbyterian Church in the U.S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U.S. 440 (1969) (holding the First Amendment "commands civil courts to decide church property disputes without resolving underlying controversies over religious doctrine."); *Md. & Va. Eldership of Churches of God v. Church of God at Sharpsburg, Inc.*, 396 U.S. 367, 370 (1970) (Brennan, J., concurring) ("[G]eneral principles of property law may not be relied upon if their application requires civil courts to resolve doctrinal issues."); *Jones v. Wolf*, 443 U.S. at 604 (stating that if applying neural principles

of law "would require a civil court to resolve a religious controversy, then the court must defer to the resolution of the doctrinal issue by the authoritative ecclesiastical body"). Any application of neutral principles thus must comply with "the constitutional mandate that civil courts are bound to accept the decisions of the highest judicatories of a religious organization of hierarchical polity on matters of discipline, faith, internal organization, or ecclesiastical rule, custom, or law." *Milivojevich*, 426 U.S. at 715. It is not that neutral principles must yield if the origins of a dispute are doctrinal, as Respondents describe Appellants' argument. It is that neutral principles must yield when a court's use of them decides or implicates these issues.

Respondents suggest, however, that those same cases demonstrate that neutral principles need not yield here, because those disputes, like the instant one, grew out of underlying ecclesiastical issues, and neutral principles nevertheless was an appropriate measure for resolving them. But Respondents overlook a critical distinction between those cases and the present one: While there is no evidence any of the denominations in those cases included in their governance significant regulation of their local churches' fiscal and property-related affairs, here it is *undisputed* that the National Church's governance includes *extensive* rules expressly governing diocesan property and parish property. These include not only the Dennis Canon, which expressly demonstrates the trust interest imposed on all local church property in favor of the National Church, but also canons substantially regulating the business and financial affairs of each diocese and parish by mandating annual audits, adequate property insurance, and bonded treasurers, as well as by forbidding local churches from selling or encumbering real property without diocesan consent. E.g. (D 203,

pp.46-47, 71) ("Of Business Methods in Church Affairs" and "Of Dedicated and Consecrated Churches"); (D 202, pp.45-46, 69) (2006 version); (D 190, pp.27-28, 48-49) (1970 version).

This difference is significant, because the extent of The Episcopal Church's rules demonstrate that this denomination's governance of property is part of its fundamental polity and administration. Indeed, portions of the Book of Common Prayer show that the Church's rules governing physical property in some instances have direct theological underpinnings. (D 6, BCP p.567) ("The Dedication and Consecration of a Church"). As a result, any court decision, such as the one below, that ignores or contravenes the National Church's governance on these issues violates the First Amendment.

Respondents also relegate an incredibly important point about *Maryland and Virginia Eldership* to a footnote: the church in question was hierarchical in some respects, but congregational with respect to the control and use of property. (Respondents' Brief, p.26 n.48) (citing *Md. & Virginia Eldership of Churches of God v. Church of God at Sharpsburg, Inc.*, 241 A.2d 691, 664 (Md. 1968) vacated by 393 U.S. 528 (1969)). That simple but critical distinction removes the factual result of that case from any relevance to this dispute.

Furthermore, in *Jones*, the Supreme Court's most recent pronouncement on neutral principles, the Court said that even a "neutral" state law setting out a "rebuttable presumption of majority rule" in a property dispute must yield to a provision in the denomination's governing documents providing for a trust in local church property. *Jones*, 443 U.S. at 607-08. The Dennis Canon is precisely that sort of provision, and under *Jones* it controls.

Respondents concede that "no court could determine who is the appropriate minister for a religious organization—that is a 'matter strictly ecclesiastical.'" (Respondents' Brief,

p.30). This question includes the question of who is the true bishop of an Episcopal Diocese. It also includes the question of who constitutes the diocese of a national church, and the Respondents themselves quote language from *Milivojevich* recognizing that courts are precluded from entertaining these questions, even in property disputes. (Respondents' Brief, p.29) (quoting *Milivojevich*, 426 U.S. at 706). This prohibition includes many other findings that the trial court improperly made in this case, at Respondents' urging:

- That respondent parishes were never "members" of The Episcopal Church;

- That the Diocese can withdraw from the National Church;

- That "there was nothing consensual between [The Episcopal Church] and the parish churches in the process used to adopt" the Dennis Canon;

- That The Episcopal Church has no power with respect to the internal affairs of a diocese; and

- That Bishop Lawrence continued to lead the Diocese after his disassociation from The Episcopal Church.

The trial court addressed these issues because they are necessary to resolve this dispute, but the problem with the court purporting to resolve them is that these issues are ecclesiastical. This is why Respondents wrote, in their brief, that "[t]he real question is not whether there are doctrinal, ecclesiastical or governance issues underlying the dispute, it is whether a civil court is required to decide those issues in order to resolve the dispute before it." (Respondents' Brief, p.26). Agreed. It does not take a searching and involved inquiry to see that this case implicates questions of religious governance and administration. The questions are front and center. The dissidents are asking a court to declare—in direct contravention to the General Convention's rulings—that a Diocese can unilaterally leave the Church.

Justice Frankfurter described some church cases as being "generated by conflicts of faith" but also being "fairly isolated as controversies over property." *Kedroff v. St. Nicholas Cathedral of Russian Orthodox Church in N. Am.*, 344 U.S. 94, 122 (1952) (Frankfurter, J., concurring). A case testing the Diocese's ability to secede does not fit this bill.

For each ecclesiastical question, a court must defer to the determinations made by the National Church. Failing to do so unconstitutionally infringes on the hierarchical structure of the National Church and impermissibly converts it into a congregational church. That is precisely what happened here. The trial court's order, which Respondents proclaim is neutral, decided these quintessentially ecclesiastical questions and granted Respondents powers, including over local church property, they do not enjoy within the Church's structure. This case therefore is distinguishable from those cases on which Respondents rely.

Just as above, the notion that there is a distinction between "religious" parishes and dioceses and "civil" ones is a red herring. The ecclesiastical nature of each being is inextricably linked with its nominally civil side. The trial court's focus solely on the Respondents' civil characteristics while ignoring their ecclesiastical nature and commitments under the pretense of neutrality is not what the Supreme Court envisioned when it approved neutral principles; rather, it is a misguided attempt to avoid the constitutional limitations on that approach by pretending blindness to the ecclesiastical issues at stake.

iv. The Episcopal Church properly structured its relationship with local parishes to confirm a trust over their property.

In direct response to the Supreme Court's ruling in *Jones* that national churches can place trust clauses in their governing documents to control the disposition of property in the

event of a schism, The Episcopal Church enacted the Dennis Canon. Each of the parishes in this lawsuit agreed, in writing, to abide by and follow the National Church's constitution and canons, thereby confirming written intent to hold their property in trust for the National Church. Indeed, nearly all reaffirmed those commitments *after* the Dennis Canon's adoption.

The Respondents repeatedly pronounce that The Episcopal Church did not adopt appropriate measures to protect itself. But the argument that the Dennis Canon is insufficient to protect the National Church's property interests disregards *Jones*' explicit recognition that the burden on churches enacting such provisions be "minimal." If a nation-wide church had to follow a series of particular procedures that varied from state to state to do just what *Jones* permitted it to do, "the burden on the parent churches, the local churches that formed the hierarchical denominations and submitted themselves to their authority, and the free exercise of religion by their members would not be minimal but immense." *Timberridge Presbyterian Church*, 719 S.E.2d at 453. The "peculiar genius" of what *Jones* permits is its flexibility: despite varying state laws and different requirements, which Respondents freely acknowledge, the Dennis Canon has been upheld in every other jurisdiction with the sole exception of *All Saints*. These decisions admittedly have nuances—some cases find the canon imposes an express trust; other cases view the canon as strong evidence of the parties' intent. But the end results are the same, and as Respondents also concede, *All Saints* was not presented with and did not consider whether failing to give effect to the Dennis Canon infringes on The Episcopal Church's constitutional rights. *All Saints* therefore did not focus on accession and identity, the very questions presented here. Here, both this Court and the trial court have been presented with extensive argument and evidence on these very points.

Respondents also point to the absence of a rule requiring National Church approval of parish and diocesan charters as further evidence that Appellants failed to take the necessary steps to protect their property interests. Respectfully, the better view is to see this as unremarkable and unexceptional. Each parish and diocese pledged unconditional loyalty to The Episcopal Church. Implicit in that accession is the idea that a parish or diocese will not be able to buck the Constitution and Canons of the National Church or separate from it. Indeed, that is entirely incompatible with the very concept of unconditional accession. The only way Respondents could pursue their plot to leave the National Church was to violate their oaths and obligations, and then seek judicial blessing of their actions.

The Episcopal Church did exactly what *Jones* permitted it to do—and, indeed, suggested that denominations do—and requiring anything more results in an unconstitutional burden on The Episcopal Church's free exercise rights. This burden is palpable on its face. Other courts have acknowledged the extent of that burden without the need for any actual evidence of it. See *Christ Church II*, 718 S.E.2d at 244-45 (holding that the burden on the Episcopal Church "would not be minimal but immense" if it had to follow the strictures of a state statute to place a trust over property); *In re Episcopal Church Cases*, 198 P.3d at 80 ("Requiring a particular method to change a church's constitution—such as requiring every parish in the country to ratify the change—would infringe on the free exercise rights of religious associations to govern themselves as they see fit. It would impose a major, not a 'minimal,' burden on the church governance.").

Appellants structured their relationship with Respondents precisely to protect Appellants' property interests. The Respondents cannot undo this unilaterally.

CONCLUSION

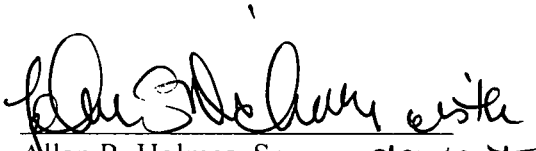
The trial court and the dissidents who brought this suit seem to view the promise of religious freedom as a license to use local majority rule to convert a hierarchical church into something different. Respectfully, that view of religious liberty is mistaken. A church's polity is not relegated to the same status as the rules of a labor union or a book club. As the Supreme Court suggested in *Hosanna-Tabor*, such a notion is "untenable" and "hard to square with the text of the First Amendment itself, which gives special solicitude to the rights of religious organizations." *Hosanna-Tabor v. E.E.O.C.*, 132 S. Ct. 694, 706 (2012).

The principal error here is that the trial court's ruling invades The Episcopal Church's structure, decrees that the church's rules are not binding on its dioceses or its parishes, and holds that the oaths the church requires of its leaders have no legally cognizable effect. The secondary error is that the trial court's ruling is not faithful to neutral civil law. Thus, reversal is required even if the Court sets the First Amendment to the side.

People are entitled to choose their own religious beliefs and to affiliate with whomever they choose. These dissidents are dissatisfied with The Episcopal Church's doctrine and its authority, and nobody resents them for that dissatisfaction. But they cannot band together, co-opt parts of The Episcopal Church itself, and seek to turn those parts of the church into something different. That sort of action is a direct challenge to The Episcopal Church's polity, and it is a far cry from neutral principles, which settles a *property* dispute by looking at documents like deeds and church constitutions to discern evidence of a trust. The most striking of the trial court's errors was its consistent refusal to acknowledge the polity issues in this case. Then, the court changed course in its final order and decided them.

This Court should reverse. The Court should hold that The Episcopal Church in South Carolina is entitled to control the Diocesan corporation, the Trustee Corporation, and all diocesan assets, including trademarks. The Court should further hold that, as the Supreme Courts of Massachusetts, Georgia and many other States have held, the Dennis Canon is enforceable and all parish property at issue is held in trust for The Episcopal Church and The Episcopal Church in South Carolina. The parties knew all of this very well. That is why Bishop Lawrence and his followers followed the protracted procedure that led them to file this lawsuit.

Respectfully submitted,



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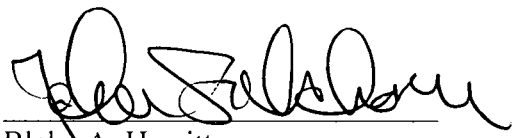

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THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

RECEIVED
JUN 25 2015
S.C. Supreme Court

Case No. 2013-CP-18-00013

The Protestant Episcopal Church
in the Diocese of South Carolina et. al. . . . . Respondents,

v.

The Episcopal Church (a/k/a The Protestant
Episcopal Church in the United States of
America) and The Episcopal Church in South Carolina . . . . . Appellants.

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