

**THE PROTESTANT EPISCOPAL CHURCH
IN THE UNITED STATES OF AMERICA**

Before the Disciplinary Board for Bishops

Hearing Panel






**In the Matter of Rt. Rev. Samuel Johns Howard
(Discrimination Matter)**

Church Initial Disclosure Pursuant to Canon IV.13.5.a

The Episcopal Church, by its Church Attorney, makes this disclosure as required by Title IV, Section 13.5.a of the Canons of the General Convention ("Canons"). This disclosure is subject to supplementation, as the ongoing investigation and discovery will likely generate additional relevant evidence, including additional witnesses and documents.

The inclusion of a person on the list below does not indicate that the person will necessarily be called as a witness at the hearing.

Persons Who May Have Knowledge of Material Facts

Name	Topic
Rt. Rev. Samuel Johnson Howard c/o Stephen D. Busey, Esquire	All factual matters set forth in the Statement of Alleged Offenses ("SAO") and Response thereto.
	 who has knowledge of facts regarding her experiences in the Diocese of Florida, including factual matters averred in the SAO.
 church	Canon to the Ordinary at times relevant to matters addressed in SAO, with information concerning interactions with Complainant.
 	Rector of parish where Complainant currently works, with knowledge of Complainant's capabilities and skills.

[REDACTED]	Priest who worked in the Diocese of Florida with knowledge concerning Respondent's communications to clergy on the issue of same-sex marriage.
[REDACTED]	Priest in Diocese of Florida with knowledge concerning retaliation for support of LGBTQ+ support group.
[REDACTED]	Priest in Diocese of Florida with knowledge concerning retaliation for support of work with LGBTQ+ college students.
[REDACTED]	Individual with knowledge concerning denial of access to discernment in the Diocese.
[REDACTED]	Priest with knowledge concerning denial of access to licensing and employment in Diocese of Florida.
[REDACTED]	Priest in Georgia with knowledge concerning denial of access to discernment, licensing and employment in Diocese of Florida.
[REDACTED]	[REDACTED] with knowledge of Respondent's views and practices over time concerning LGBTQ+ clergy.
[REDACTED]	Priest in Diocese of Florida who had contact with Complainant during her efforts to obtain work in the Diocese, with knowledge of Respondent's policies concerning LGBTQ+ clergy in the Diocese.

Documents in the Possession of the Church

The Church is in possession of documents gathered during the investigation by the Intake Officer and the Investigator assigned to the matter. All are in electronic format, and the Church Attorney will coordinate with counsel for the Respondent the most effective means of producing the materials. The Church Attorney will discuss with counsel for the Respondent whether it is appropriate to request the entry of a protective order governing the use of these materials in advance of the hearing. The Church anticipates that its continuing investigation may generate additional relevant documents, and it will supplement its production of documents to the Respondent's counsel as the matter proceeds.

Dated: November 26, 2024



Craig T. Merritt
Church Attorney

Certificate of Service

The undersigned certifies that a true copy of the above initial disclosures was served on Stephen D. Busey, counsel for the Respondent, by electronic mail at *busey@smithhulsey.com* on November 26, 2024.



Craig T. Merritt