

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

Before the Disciplinary Board for Bishops

Hearing Panel

**In the Matter of Rt. Rev. Prince G. Singh
(Diocese of Rochester Matter)**

Statement of Alleged Offenses

The Church Attorney, pursuant to Title IV, Canon 13, Sec. 2 of the Canons of the Protestant Episcopal Church in the United States of America (referred to respectively in this Statement as the “Canons” and the “Church”), submits this Statement of Alleged Offenses.

Procedural History and Jurisdictional Matters

1. On September 22, 2023, the Intake Officer for the Disciplinary Board for Bishops (the “Board”) referred the matters addressed in this Statement to a Reference Panel composed of the Rt. Rev. Clifton Daniel, III, Presiding Bishop-Designate; the Rt. Rev. Chilton Knudsen, President of the Disciplinary Board for Bishops; and the Rev. Barbara Kempf, Intake Officer for Bishops. The Rt. Rev. Nicholas Knisely succeeded Bishop Knudsen as President of the Board in Spring 2024, and as a consequence succeeded her as a member of the Reference Panel.

2. The Complainants are [REDACTED]

[REDACTED]

3. Upon consideration of the matters presented by the Intake Officer, the Reference Panel determined on October 10, 2023, to refer the allegations for investigation pursuant to Canon IV.11. *See* Canon IV.6.8(c) (option to refer to investigation). The Board

thereafter engaged RC Services of New York, LLC (the “Investigator”) to conduct the investigation.

4. On May 3, 2024, the Investigator reported the results of its work to the Reference Panel.

5. After consideration of the information provided by the Investigator, and after due deliberation, the Reference Panel referred the matter to this Hearing Panel on June 7, 2024. *See* Canon IV.11.3(e) (referral to Hearing Panel).

6. This Hearing Panel was appointed by the President of the Board to hear and adjudicate the matters set forth below, which fall within its jurisdiction pursuant to Canon IV.13.

7. This is an ecclesiastical matter under the exclusive jurisdiction of the Church. *See* Canon IV.19.1. By taking ordination vows and receiving Holy Orders, Respondent consented to subject himself to the jurisdiction of the Church with regard to the adjudication of alleged violations of the Canons. *Id.* Pursuant to the Canons, disciplinary cases involving bishops are investigated, adjudicated, or otherwise resolved by the Board. *See* Canon IV.17.3.a. The Hearing Panel in this matter is appointed to hear evidence and impose any remedy authorized by the Canons. *See* Canon IV.17.5.

Summary of Material Facts

8. In February 2008, the Rt. Rev. Prince Singh (“Respondent”) was elected Bishop Diocesan of the Episcopal Diocese of Rochester (“Diocese”). He was consecrated as Bishop Diocesan of the Diocese on May 31, 2008, and served in that capacity until his resignation in February 2022.

Episode One

9. In the year 2018, while attending a social event, [REDACTED] [REDACTED] received a report from an attendee concerning alleged sexual activity by a [REDACTED] Priest [REDACTED]

[REDACTED] The truth or falsity of the allegations was not known [REDACTED]. If true, the described activity would have constituted a violation of one or more Canons of the Church.

10. [REDACTED] reported personally to the Respondent that he had received the allegations of misconduct described in the paragraph above. [REDACTED] reminded the Respondent that such allegations required prompt reporting to the Church as required by Title IV of the Canons.

11. Rather than report the allegations to the Intake Officer for the Board, as they related to Respondent, and to the Diocesan Intake Officer, as they related to the Priest, Respondent advised [REDACTED] that he would handle the matter by other means. [REDACTED] disagreed with this proposed handling of the complaint, and specifically the diversion of the matter away from the mandatory reporting processes governed by Title IV of the Canons but was warned by the Respondent to have nothing more to do with it.

12. The allegations were never reported to the Intake Officer for the Board, in the case of Respondent, or to the Diocesan Intake Officer, in the case of the Priest, from the time of [REDACTED] initial report to the Respondent, until the present day.

13. Instead of referring the allegations against the Priest to the Diocesan Intake Officer, the Respondent engaged in a series of direct contacts with the Priest. Respondent

directed the Priest to avail [REDACTED] of mental health services and made efforts to reassign [REDACTED] and otherwise pressure [REDACTED] to accept conditions of employment that were unacceptable to [REDACTED]. These contacts included a visit to the home of the Priest by the Respondent and [REDACTED].

14. The effort to coerce the Priest involved threats by the Respondent to initiate a Title IV complaint against [REDACTED] if [REDACTED] did not accept Respondent's demands. Ultimately, [REDACTED] resigned.

Episode Two

15. In the Fall of 2017, the Respondent attended an event at a parish in the Diocese. A lay leader present at the event, [REDACTED], stated that [REDACTED] observed an incident during the visit involving the Respondent's improper touching [REDACTED].

16. The lay person, after approximately a year of hesitation, reported the alleged incident to [REDACTED] parish priest. The complaint was brought to the attention of [REDACTED]. [REDACTED] reported the complaint directly to Respondent, reminding Respondent that such a complaint required mandatory reporting to the Intake Officer for the Board, who was and is exclusively assigned to receive complaints against bishops.

17. Respondent reacted to this report in explosive fashion, admonishing [REDACTED] in profane terms [REDACTED]. Respondent insisted that the allegations not be routed to the Intake Officer in the Church's Office for Pastoral Development, as required by Title IV of the Canons.

18. [REDACTED] pushed back against this treatment of the complaint as being in violation of the Canons. In response, Respondent told [REDACTED] that [REDACTED] must comply with the Respondent's decision or be fired [REDACTED]

19. Respondent directed [REDACTED] to forward the complaint to the Diocesan Intake Officer for handling entirely within the Diocese. [REDACTED] complied.

20. The Diocesan Title IV inquiry exonerated the Respondent. The Diocesan Intake Officer dismissed the complaint and issued a letter on Diocesan Disciplinary Board letterhead to that effect dated November 29, 2018. The letter advised the Complainant of his appeal rights under the Canons, continuing to direct him to the Diocesan process rather than to the Board.

21. Related to the same complaint, Respondent took the opportunity to publicly humiliate [REDACTED] who reported the alleged misconduct. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

22. During the meeting, the Respondent publicly excoriated [REDACTED] who had initiated the complaint of improper touching. [REDACTED] had urged Respondent not to do so. Nonetheless, the Respondent accused [REDACTED], in front of attendees, of lying and of threatening Respondent's reputation, marriage, children, and family. When [REDACTED] tried to defend his actions, [REDACTED] was told that the matter had been handled in accordance with Canon law.

23. As a result of this public display of hostility by the Respondent, and in fear that the Respondent might retaliate against the parish, the complaining individual [REDACTED]

Relevant Canonical Provisions

24. Canon IV.3.1.a states that a member of the Clergy shall be subject to proceedings under Title IV for: “knowingly violating or attempting to violate, directly or through the acts of another person, the Constitution or Canons of the Church or of any Diocese.”

25. Canon IV.3.1.e states that a member of the Clergy shall be subject to proceedings under Title IV for: “discharging, demoting, or otherwise retaliating against any person because the person has opposed any practices forbidden under this Title or because the person has reported information concerning an Offense, testified, or assisted in any proceeding under this Title.”

26. Canon IV.3.2 states that: “A Member of the Clergy shall be accountable for any breach of the Standards of Conduct set forth in Canon IV.4.”

27. Canon IV.1.f. states that in exercising his or her ministry, a Member of the Clergy shall: “report to the Intake Officer all matters which may constitute an Offense as defined in Canon IV.2 meeting the standards of Canon IV.3.3, except for matters disclosed to the Member of the Clergy as confessor within the Rite of Reconciliation of a Penitent.”

28. Canon IV.4.1.h.9. states that exercising his or her ministry, a Member of the Clergy shall “refrain from . . . any Conduct Unbecoming a Member of the Clergy.”

29. Canon IV.2. describes the terminology used in Title IV, stating that Conduct Unbecoming a Member of the Clergy means: “any disorder or neglect that prejudices the

reputation, good order and discipline of the Church, or any conduct of a nature to bring material discredit upon the Church or the Holy Orders conferred by the Church.”

Offenses Charged

(Episode One)

30. With regard to Episode One, Respondent was under a duty to report the alleged misconduct of the involved Priest to the Intake Officer of the Diocese. Respondent was also under a duty to report the allegations of misconduct against him to the Intake Officer for the Board. From the time he first learned of the allegations of sexual impropriety to date, Respondent took no action to report the allegations. The continuing failures to report, as to either himself or the Priest, constitute violations of Canon IV.4.1.f. for which Respondent is accountable under Canon IV.3.2.

31. The failures to report the allegations of misconduct by the Priest and the Respondent each constituted a knowing violation of the Canons of the Church, a violation of Canon IV.3.1.a.

32. The directive to [REDACTED] not to report the alleged violation by the Priest and to ignore Respondent’s failure to report the alleged violation by the Priest, was a violation of the Canons through the acts of another person, a violation of Canon IV.3.1.a.

33. The facts and circumstances of Episode One in their entirety, including the rejection of [REDACTED] entreaties to follow the requirements of the Canons of the Church, evidence a neglect or disorder that prejudiced the good order and discipline of the Church, and constitute Conduct Unbecoming a Member of the Clergy, a violation of Canon IV.4.1.h.9.

(Episode Two)

34. With regard to Episode Two, Respondent was under a duty to report an allegation of his own misconduct to the Intake Officer for the Disciplinary Board for Bishops. He was under a further duty to refrain from impeding legitimate efforts of ██████████ ██████████ to direct a complaint against Respondent to the Board.

35. From the time he first learned of the allegation that he had engaged in a Canonical offense involving improper touching, Respondent took no action to report the allegation. The continuing failure to report is a violation of Canon IV.4.1.f. for which Respondent is accountable under Canon IV.3.2.

36. The failure to report the alleged violation was a knowing violation of the Canons of the Church, a violation of Canon IV.3.1.a.

37. The redirection of the complaint that Respondent had engaged in a potential Canonical violation to the Diocesan Title IV process rather than to the Intake Officer for the Board was a knowing violation of the Canons of the Church, a violation of Canon IV.3.1.a.

38. The directive to ██████████ to not report the alleged violation and to ignore Respondent's failure to report the alleged violation, was a violation of the Canons through the acts of another person, a violation of Canon IV.3.1.a.

39. The threats of retaliation, including the threat of termination, directed to ██████████ ██████████ were made in response to ██████████'s proper efforts to engage the Title IV process as it applies to Bishops of the Church, a violation of Canon IV.3.1.e.

40. The facts and circumstances of Episode Two in their entirety, including Respondent's public shaming and humiliation of a member of the laity who reported alleged misconduct, brought material discredit on the Church and undermined its good order and

discipline, constituting Conduct Unbecoming a Member of the Clergy, a violation of Canon IV.4.1.h.9.

Wherefore, the Church Attorney respectfully requests that the Hearing Panel, after the taking of evidence, enter an Order imposing such Sentence upon the Respondent as it may determine is proper.

Dated: June 21, 2024

A handwritten signature in cursive script, reading "Craig Thomas Merritt", is written over a horizontal line.

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