

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

Before the Disciplinary Board for Bishops

Hearing Panel

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

RESPONDENT'S WRITTEN RESPONSE TO NOTICE

Respondent, The Rt. Rev. Prince G. Singh ("Bishop Singh"), by and through his counsel, Scott A. Smith of Smith Legal PLLC, pursuant to Canon IV.13.2.c hereby responds to the Notice provided by the Hearing Panel in this matter.

Response to Statement of Alleged Offenses

For his Response to the Statement of Alleged Offenses ("Statement") prepared by the Church Attorney, Bishop Singh states and avers as follows:

Response to Procedural History and Jurisdictional Matters

1. Bishop Singh admits that the Disciplinary Board for Bishops ("the Board") possesses Canonical jurisdiction to hear and resolve this matter pursuant to Canons IV.13 and IV.17.3 and that this matter is properly before the Hearing Panel. Bishop Singh is without personal knowledge or information sufficient to allow him to admit or deny the remaining allegations set forth in Paragraphs 1-7 of the Statement.

2. Bishop Singh admits the allegations set forth in Paragraph 8 of the Statement.

Response to Allegations of Episode One

3. Bishop Singh expressly denies that he ever engaged in sexual activity with the [REDACTED] priest referenced in Paragraph 9 of the Statement and notes that no such claim is alleged in

the Statement. Bishop Singh is without personal knowledge or information sufficient to allow him to admit or deny the remaining allegations set forth in Paragraph 9 of the Statement.

4. With regard to Paragraph 10 of the Statement, Bishop Singh expressly denies that he received any report from [REDACTED] to the effect that Bishop Singh was alleged to have engaged in sexual activity with the [REDACTED] priest referenced in Paragraph 9 of the Statement. Bishop Singh further denies having been “reminded” by [REDACTED] regarding Bishop Singh’s obligations to report allegations to the national Church. Bishop Singh is without knowledge or information sufficient to allow him to admit or deny the remaining allegations set forth in Paragraph 10 of the Statement.

5. Bishop Singh denies the allegations set forth in Paragraph 11 of the Statement.

6. Bishop Singh affirmatively states that allegations regarding the [REDACTED] priest’s activities were reported by him to the Intake Officer for the Diocese and the President of the Diocesan Disciplinary Board at the time Bishop Singh became aware of them. On that basis, Bishop Singh denies the allegations set forth in Paragraph 12 of the Statement.

7. With regard to the allegations set forth in Paragraph 13 of the Statement, Bishop Singh affirmatively states that he issued multiple Pastoral Directions to the [REDACTED] priest in question as authorized by Canon IV.7 and that those Pastoral Directions are a matter of record. Bishop Singh further affirmatively states that, as part of the authority granted him by Canon IV.7, he placed the [REDACTED] priest in question on paid administrative leave and directed [REDACTED] to undergo mental health evaluation and treatment and perform other actions before [REDACTED] administrative leave would be ended. Bishop Singh admits that, again as part of the pastoral direction process, he met with the [REDACTED] priest in question at [REDACTED] home, at [REDACTED] request. To the extent not admitted or qualified above, Bishop Singh denies the allegations set forth in Paragraph 13 of the Statement.

8. Bishop Singh admits that the [REDACTED] priest in question voluntarily resigned from [REDACTED] position as rector and denies the remaining allegations set forth in Paragraph 14 of the Statement.

Response to Allegations of Episode Two

9. Bishop Singh denies that he engaged in any improper touching [REDACTED] [REDACTED] during an event in the fall of 2017 or at any other time and is without knowledge or information sufficient to allow him to admit or deny the remaining allegations set forth in Paragraph 15 of the Statement.

10. Bishop Singh is without knowledge or information sufficient to allow him to admit or deny the allegations set forth in Paragraph 16 of the Statement.

11. Bishop Singh denies the allegations set forth in Paragraphs 17, 18 and 19 of the Statement.

12. With regard to Paragraph 20 of the Complaint, Bishop Singh admits that the Diocesan Intake Officer conducted a thorough investigation of the allegations at issue, determined that there was no factual basis for them, and advised the Complainant of his findings in a letter dated November 29, 2018, the contents of which speak for itself. To the extent not admitted or qualified above, Bishop Singh denies any remaining allegations set forth in Paragraph 20 of the Statement.

13. With regard to Paragraph 21 of the Statement, Bishop Singh admits that he attended several meetings during 2018 and 2019 [REDACTED]

[REDACTED] Bishop Singh expressly denies having “publicly humiliate[d]” any individual attending any such meeting. Bishop Singh is without knowledge or information

sufficient to allow him to admit or deny the remaining allegations set forth in Paragraph 21 of the Statement.

14. Bishop Singh denies the allegations set forth in Paragraph 22 of the Statement.

15. Bishop Singh denies engaging in any “public display of hostility” toward the individual in question and is without knowledge or information sufficient to allow him to admit or deny the remaining allegations set forth in Paragraph 23 of the Statement.

16. Paragraphs 24-29 of the Statement are recitations and/or quotations from certain Canons as identified therein and require no response from Bishop Singh.

Response to Offenses Charged

17. Bishop Singh denies the allegations set forth in Paragraphs 30-40 of the Statement.

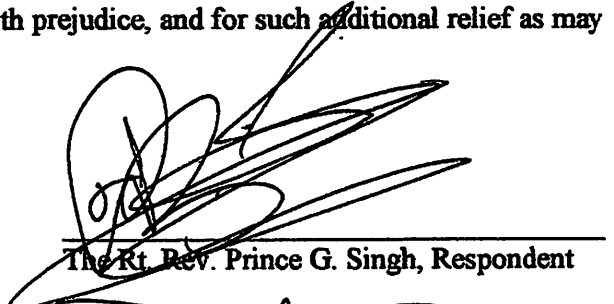
Affirmative Defenses

18. All or a portion of the Offenses with which Bishop Singh has been charged are barred by the expiration of applicable limitations periods set forth at Canon IV.19.4.


19. The charges constitute violations of Canonical due process. Specifically, Bishop Singh was contacted by the Investigator for an interview in this matter and had agreed to give one, and Bishop Singh and the Investigator were working on a time and date for the same when the Reference Panel referred the matter to this Hearing Panel. Bishop Singh was thereby denied the opportunity to present his side of the story before the Reference Panel acted. As a consequence, the Investigator did not fully investigate all facts pertinent to the factual claims of the intake report within the meaning of Canon IV.11.2, and the Reference Panel’s referral of this matter to the Hearing Panel violated Bishop Singh’s Canonical rights of due process.

WHEREFORE, Bishop Singh respectfully requests and prays that the Hearing Panel enter an Order dismissing all charges against him with prejudice, and for such additional relief as may be proper under the circumstances.

Dated: August 26, 2024.



The Rt. Rev. Prince G. Singh, Respondent



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