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FILE NO: 67361.000003

August 27, 2014

**VIA OVERNIGHT MAIL**

Supreme Court of the United States  
1 First Street NE  
Washington, DC 20543

**Re: *The Episcopal Church, et al. v. The Episcopal Diocese of Fort Worth, et al.*  
No. 13-1520  
On Petition for a Writ of Certiorari to the Supreme Court of Texas  
Letter for The African Methodist Episcopal Church, Incorporated as  
*Amicus Curiae* in Support of Petitioners**

Dear Justices of the Supreme Court of the United States:

On July 21, 2014, The Episcopal Church in South Carolina, et al. filed their Brief as *Amici Curiae* in Support of Petitioners. The African Methodist Episcopal Church, Incorporated (“AME Church, Inc.”) files this letter joining said brief as an *amicus curiae*.<sup>1</sup>

The African Methodist Episcopal Church was established formally as a denomination in 1816 in Pennsylvania. Today, the AME Church, Inc. has approximately 2.5 million members in twenty Episcopal Districts in thirty-nine countries. Thirteen of the Episcopal Districts are in the United States. The AME Church, Inc. is organized and functions solely as a connectional organization. Each local church is a part of the larger connection. The titles to all real, personal, and mixed property held at the General, Annual Conference level or by the local churches, is held in trust for the AME Church, Inc. and subject to the provisions of *The Doctrine and Discipline of the African Methodist Episcopal Church*.

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<sup>1</sup> Pursuant to this Court’s Rule 37.6, *amicus curiae* AME Church, Inc. states that no person other than the AME Church, Inc. and its counsel authored this letter or made a monetary contribution intended to fund the preparation or submission of this letter. Counsel of record for all parties received notice of this filing compliant with this Court’s Rule 37.2 and each has consented to this filing.


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The AME Church, Inc. has been involved in several matters where application of its canon, particularly with regard to property ownership and transfer, has been at issue. It is currently involved in litigation in the Fifth Circuit against dissident former members of the St. James AME Church in Hammond, Louisiana. *African Methodist Episcopal Church v. Willard Lucien, et al.*, No. 13-30617 (5th Cir.). In that matter, former church officers and members renounced their membership and attempted to seize church property and assets and oust the church members who were continuing to worship at the Hammond church facility. In acts prohibited by *The Doctrine and Discipline of the African Methodist Episcopal Church*, the dissident former members executed documents that purportedly transferred the property of St. James AME Church to themselves as trustees of a newly created pseudonym entity and evict the AME Church, Inc. and its remaining congregation. The district court of the Eastern District of Louisiana granted the AME Church, Inc.'s motion for summary judgment and denied the St. James Church's cross motion, declaring that the defendants' acts in purporting to transfer title to the property and in obstructing the AME Church, Inc.'s access to it were illegal and enjoining them from engaging in similar future behavior. However, on appeal, the Fifth Circuit Court of Appeals recently vacated the district court's rulings and remanded based on subject matter jurisdiction.<sup>2</sup> Thus, the ownership of the church property is still at issue, and the AME Church, Inc. faces the risk of its First Amendment rights being violated in this and other matters.

The AME Church, Inc. fully supports Petitioners in the above-captioned matter before this Court, as their position is consistent with the AME Church, Inc.'s governing rules and principles.

Thank you for your consideration and attention to this matter.

Sincerely,



Ryan A. Shores  
Counsel for *Amicus Curiae*  
The African Methodist Episcopal Church, Incorporated

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<sup>2</sup> The St. James Church initially filed an eviction action against the AME Church, Inc. in Louisiana state court. The AME Church, Inc. removed that action to federal court and filed its own action in federal court against the St. James Church. The Court of Appeals found that the Louisiana state court had jurisdiction, and the federal court did not, to hear the eviction case. The Court of Appeals therefore ordered that the eviction action be remanded to state court and stayed the AME Church, Inc.'s federal action pending the result of the state action.

No. 13-1520

IN THE

**Supreme Court of the United States**

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THE EPISCOPAL CHURCH, ET AL.,

*Petitioners,*

v.

THE EPISCOPAL DIOCESE OF FORT WORTH, ET AL.,

*Respondents.*

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THE DIOCESE OF NORTHWEST TEXAS, ET AL.,

*Petitioners,*

v.

ROBERT MASTERSON, ET AL.,

*Respondents.*

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CERTIFICATE OF SERVICE

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I hereby certify that I am a member in good standing of the bar of this Court and that on this 27th day of August, 2014, I caused a copy of the Letter for The African Methodist Episcopal Church, Incorporated as *Amicus Curiae* in Support of Petitioners to be served by third-party commercial carrier on the counsel identified below, and caused an electronic version to be transmitted to the counsel identified below, pursuant to Rule 29 of the Rules of this Court. All parties required to be served have been served.

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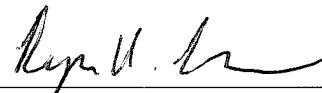
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