

***Exhibit 14***

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF DORCHESTER )  
 )  
 The Protestant Episcopal Church In The )  
 Diocese Of South Carolina; The Trustees of )  
 The Protestant Episcopal Church in South )  
 Carolina, a South Carolina Corporate Body; )  
 All Saints Protestant Episcopal Church, Inc.; )  
 Christ St. Paul's Episcopal Church; Christ )  
 The King, Waccamaw; Church Of The )  
 Cross, Inc. and Church Of The Cross )  
 Declaration Of Trust; Church Of The )  
 Holy Comforter; Church of the Redeemer; )  
 Holy Trinity Episcopal Church; Saint )  
 Luke's Church, Hilton Head; Saint )  
 Matthews Church; St. Bartholomews )  
 Episcopal Church; St. Davids Church; )  
 St. James' Church, James Island, S.C.; St. )  
 John's Episcopal Church of Florence, S.C.; )  
 St. Matthias Episcopal Church, Inc.; St. )  
 Paul's Episcopal Church of Bennettsville, )  
 Inc.; St. Paul's Episcopal Church of Conway;) )  
 The Church Of St. Luke and St. Paul, )  
 Radcliffeboro; The Church Of Our Saviour )  
 Of The Diocese of South Carolina; The )  
 Church Of The Epiphany (Episcopal); The )  
 Church Of The Good Shepherd, Charleston, )  
 SC; The Church Of The Resurrection, )  
 Surfside; The Protestant Episcopal Church; )  
 Of The Parish Of Saint Philip, In Charleston,) )  
 In The State Of South Carolina; The )  
 Protestant Episcopal Church, The Parish Of )  
 Saint Michael, In Charleston, In The State )  
 Of South Carolina and St. Michael's Church )  
 Declaration Of Trust; The Vestry and Church )  
 Wardens Of The Episcopal Church Of The )  
 Parish Of Prince George Winyah; The Vestry )  
 And Church Wardens Of The Episcopal )  
 Church Of The Parish Of St. Helena and The )  
 Parish Church of St. Helena Trust; The )  
 Vestry and Church Wardens Of The )  
 Episcopal Church Of The Parish Of St. )  
 Matthew; The Vestry and Church Wardens )  
 Of The Episcopal Church Of The Parish Of )

CERTIFIED COPY  
 2013 MAR 19 PM 5:14

IN THE COURT OF COMMON PLEAS  
 FOR THE FIRST JUDICIAL CIRCUIT  
 CLERK OF COURT  
 DORCHESTER COUNTY

Case No. 2013-CP-18-00013

CERTIFIED COPY  
 2013 JAN 31 AM 10:11  
 CLERK OF COURT  
 DORCHESTER COUNTY

**SUPPLEMENTAL  
 AFFIDAVIT OF JIM LEWIS**

St. Andrew's Church, Mount Pleasant; The )  
Vestry and Wardens Of St. Paul's Church, )  
Summerville; Trinity Church of Myrtle )  
Beach; Trinity Episcopal Church; Vestry and )  
Church-Wardens Of The Episcopal Church )  
Of The Parish Of Christ Church; Vestry )  
and Church Wardens Of The Episcopal )  
Church Of The Parish Of St. John's, )  
Charleston County )

PLAINTIFFS, )

v. )

The Episcopal Church (a/k/a, The )  
Protestant Episcopal Church in the )  
United States of America) )

DEFENDANT. )

Personally appeared before me, James B. Lewis, who being duly sworn, deposes and says:

1. I am employed by The Protestant Episcopal Church in the Diocese of South Carolina ("Diocese of South Carolina") as its Canon to the Ordinary. I am also its Registered Agent. I reside in Charleston County, South Carolina.

2. I previously signed an Affidavit that, on information and belief, was submitted in support of the Diocese of South Carolina's Motion for a Temporary Restraining Order.

3. On January 26, 2013 I attended a gathering called "The Episcopal Church in South Carolina." I was present from 9:30AM until its adjournment at 2:30PM. Attached as Exhibit 1 is a photograph which I took of the outdoor sign for this gathering. It accurately represents what I observed.

4. I registered as a guest, paying in cash for that registration. There were several persons taking payment for registration.

5. Prior to my registration, I observed the registration of a man who was in front of

me. He paid with a check and asked how he should make it out. He was told to make it out to the "Diocese of South Carolina." I saw him write "Diocese of South Carolina" on the payee line of the check and hand it to the person taking payment.

6. During the lunch break, I asked Thomas S. Tisdale, Jr. for a copy of the resolutions that had been considered. Callie Walpole, Convention Secretary, provided them to me. True and accurate copies of what she provided are attached as Exhibit 2. The handwritten notation at the top right of the first page was on Exhibit 2 when it was given to me.

7. I have attached as Exhibit 3 a true and accurate copy of the Agenda which I received upon registration which contains my handwritten notes on it.

8. During the course of the meeting, I observed the following:

- a. A quorum was declared to exist. If this convention were a convention of the Diocese of South Carolina, there would have been no quorum. Under the Constitution of the Diocese of South Carolina, a quorum consists of "a majority of the Clerical Order and Lay Representatives from a majority of the churches." Constitution of the Diocese of South Carolina, Article IV, Exhibit 4. If the Diocese of South Carolina consisted of all parishes and missions in union with it as of October 1, 2012, a quorum would have required 30 parishes and missions with seat and vote and 51 clergy with seat and vote. There were only 14 parishes and missions with seat and vote and 23 clergy with seat and vote.
- b. The speech of the Presiding Bishop was, as I recall it, substantially the same as its transcript, attached as Exhibit 5.
- c. Six resolutions were offered. Four resolutions, directly or indirectly, used

a registered name of the Diocese of South Carolina:

- (i) I have attached as Exhibit 6 the Constitution and Canons of the Diocese of South Carolina. I have also attached a comparative chart of the resolutions made and the references to the Constitution and Canons of the Diocese of South Carolina as Exhibit 7;
- (ii) R-1 twice references "Article II, Section 2 of the Constitution of the Diocese" as the authority for calling the convention of January 26, 2013. Article II, Section \_\_\_ of the Constitution of the Diocese of South Carolina concerns authority to call a convention;
- (iii) R-3 references "Canon XXXI, 1-25 of the Canons and Rules of Order of this Diocese" as the basis of the resolution. This is a reference to the Canons of the Diocese of South Carolina, Exhibits 6 & 7;
- (iv) R-5 dealing with the nomination and appointment of officers and elected persons is premised on compliance with "Articles III, IV, VI, VIII, with all applicable Standing Resolutions, and with Canons III, IV, VIII and XXX, Rule 1 (10) of the Canons and Rules of Order of this Diocese." These are references to provisions in the Constitution and Canons of the Diocese of South Carolina, Exhibit 6 & 7;
- (v) R-6 specifically references certain actions and resolutions of the Diocese of South Carolina taken between 2009 and November 2012. R-6 refers to these as "prior Diocesan Convention" actions


and declares "that this Convention of The Episcopal Diocese of South Carolina declares them to be null and void and have no legal effect...." The documents attached to R-6 were those passed by the Diocese of South Carolina between 2009 and November 2012.

9. I have attached as Exhibits 8 to 11, certified copies of the Articles of Incorporation of the Diocese of South Carolina together with all amendments made to them which were filed with the South Carolina Secretary of State as of January 30, 2013.


10. All of the actions taken during the meeting have the appearance that the meeting was of the "Diocese of South Carolina" even though there were oral statements that the meeting was a meeting of "The Episcopal Church in South Carolina."

FURTHER, THE AFFIANT SAYETH NOT.

January 30, 2013

  
Jim Lewis

Sworn to before me this 30 day of January, 2013

  
Notary Public for the State of South Carolina  
My Commission expires: 9/7/2021

**ELIZABETH B. SNYDER**  
Notary Public, State of South Carolina  
My Commission Expires 9/7/2021

**EXHIBIT 3**

FILED - RECORDS  
2013 JAN 31 AM 10:40  
CHERY  
CLERK OF COURT  
DORCHESTER COUNTY

1 *Mandell, Judith Jones, Dan, Ann. Chul H.*

# THE EPISCOPAL CHURCH IN SOUTH CAROLINA

## SPECIAL CONVENTION

JANUARY 26, 2013

### AGENDA

FILED - RECORDED  
2013 JAN 31 AM 10:40  
CHERYL GRAMM  
CLERK OF COURT  
DORCHESTER COUNTY

Call to Order

The Presiding Bishop

Prayer for the Proceedings of the Convention

The Rector of the Parish

Welcome to Delegates and Guests  
*... as per the canon...*

The Presiding Bishop

Appointment of a Secretary

(The Reverend Calhoun Walpole)

The Presiding

Appointment of a Parliamentarian

The Presiding Bishop

(Thomas S. Tisdale)

*Statement - compelled to read  
Sued by form Ep... Court has issued temp. rel. order...  
unclear whether that order applies to Church in S.C. ... wish to do everything to  
comply... until... Proposed... Name Proposed Church in S.C. for usual instead of  
what we believe to be accurate and correct name. Proposed name of org.  
Report of the Credentials Committee  
here by — in these proceedings.*

Lay 9 parishes (36)  
8 out parishes  
Clergy 10 missions (10)  
2 out missions (2)

Ms Lucka

Father Sanderson

{ (23) seat, voice, vote  
{ (15) seat & voice



Declaration of the Presence of a Quorum

The Presiding Bishop

*Declared*

Resolutions Concerning Special Convention

Ms. Lucka, Chair

Resolutions Committee

① Re: Special Convention received. Only to be held, unless any defects or differences  
② Grants pass, since all work is done during  
③ Report of the Committee for the Safeguarding of the Faith  
④ Dispatch of a Provisional Bishop to the Diocese  
⑤ All other business - received at convention observed in accordance

Mr. Douglas

*(1/8 on table 1, canon 51?)*

The election of a provisional bishop

The Presiding Bishop

\* ⑥ Received minutes of the special convention and action on documents checked and read  
⑦ The installation of the provisional bishop  
⑧ All offices closed at the special convention at Annual Conv. 2013

The Presiding Bishop

Remarks by the Provisional Bishop

The Bishop

⑨ Debate of the Provisional Bishop

Report of the Committee on Nominations

Mr. Tisdale

Elections to fill vacant offices

The Bishop

- Secretary - *Collin Wolpelt*
- The Treasurer of the Diocese - *Rev. Jim Taha*

*Director on Ec. Authority*

- The nomination (by the Bishop)

The Bishop

and election of the Chancellor - *Tom Tisdale*

- The appointment of the Historiographer

The Bishop

- The Standing Committee

*Scott Hand*

(6 clergy and 6 lay members by ballot)

The Bishop

(appoint 3 tellers)

- The Diocesan Council

(6 clergy and 6 lay members and others)

Appointed as directed by Canon XVIII)

The Bishop

1. *Mark Beckman*
2. *Roy Hill*
3. *Will Kott*
4. *Jeff Lindner*
5. *John Zuhl*
6. *George Tompkins*

1. *Henry Budy*
2. *Willie Budy*
3. *Placido Rey Huan*
4. *Wray Ann, Jr.*
5. *Charles Bevil (7)*
6. *Barbara Mann*

*[Signature]*

- Election of Trustees of the University of the South (one for three years, one for two Years, and one for one year)

3. Michael Wright
2. Ann Sherrill
1. Roger Black

- Announcements by the Treasurer Father Taylor  
*Ref's contribution on website*
- Report of the Convention Committee Father Lindsey  
*Approved Oct 11 to be held in Grace*
- Other business The Bishop  
*- Preliminary address by Bishop Jones, St. Philip*
- Courtesy Resolutions Ms. Lucka  
*- Ref. Chandler from canon to Canon 16*
- A Closing Prayer for the Diocese The Bishop
- Adjourn

\* Gary Jennings -

\* Angela Daniel - Pres. Pro. IV Mark Taram, War Prayer. Am pro-informatory  
ignores someone class defeat

\* Kathleen Wells - H. Wirth (continuing)