

***Exhibit 15***

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. Andrews Church-Mt. )  
 Pleasant and The St. Andrews Church-Mt. )  
 Pleasant Land Trust; 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 Holy )  
 Cross; 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 St. Jude's Church Of )  
 Walterboro; 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 )

IN THE COURT OF COMMON PLEAS  
FOR THE FIRST JUDICIAL CIRCUIT

Case No. 2013-CP-18-00013

2013 MAR 19 PM 5:14  
 DEPOSITED COPY  
 CLERK OF COURT  
 DORCHESTER COUNTY

**AFFIDAVIT OF KAREN KUSKO**

Trust; The Vestry and Church Wardens Of )  
The Episcopal Church Of The Parish Of St. )  
Matthew; The Vestry and Wardens Of St. )  
Paul's Church, Summerville; Trinity Church) )  
of Myrtle Beach; Trinity Episcopal Church; )  
Trinity Episcopal Church, Pinopolis; 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); The Episcopal )  
Church in South Carolina )  
DEFENDANT. )

Personally appeared before me, Karen Kusko, who being duly sworn, deposes and says:

1. I reside at 78 Brays Island drive, Sheldon, South Carolina 29941.
2. On March 8-9, 2013 I attended a gathering called "The Episcopal Church in South Carolina." I was present on March 8, 2013 from 7 PM to approximately 8:30 PM and then on March 9, 2013 from 9:30AM until its adjournment at approximately 11:15AM.
3. I registered as a guest, paying the registration fee through Paypal.
4. When I entered the convention on Saturday morning, I was given a copy of the "The Episcopal Church in South Carolina, The 222<sup>nd</sup> Diocesan Convention – Second Business Session" agenda. A true and accurate copy of this is attached as Exhibit 1.
5. I picked up additional documents in the reception area that included the resolutions for consideration. I have attached as Exhibit 2 a true and accurate copy of the Resolutions of "The Episcopal Church in South Carolina, Annual Meeting of the Convention,

March 8-9, 2013” to be considered.

6. The papers also included a copy of the Constitution and Canons of The Episcopal Church in South Carolina. I have attached as Exhibit 3 a true and accurate copy of The Constitution and Canons of The Episcopal Church in South Carolina.

7. Finally, the papers included the Convention seating arrangement. I have attached as Exhibit 4 a true and accurate copy of “The Episcopal Church in South Carolina Seating Arrangements for Saturday’s Business Session.”

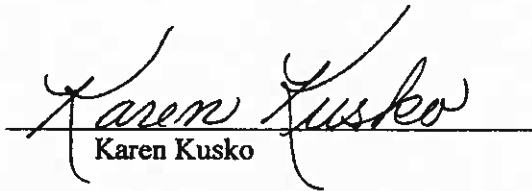
8. During the course of the meeting, I observed nine resolutions were offered. Of those nine, four directly or indirectly used a registered name of the Diocese of South Carolina:

- a. I have attached as Exhibit 5 the Constitution and Canons of the Diocese of South Carolina;
- b. R-1 references Article II, Section 2 of the Constitution of the Diocese of South Carolina as the authority for calling the convention of March 8-9, 2013;
- c. 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, Exhibit 3 and 5;
- d. R-5 references Canon XIII as the requirements “that a Board of Trustees be elected by ballot at the Annual Convention.” This is a direct reference to provisions in the Constitution and Canons of the Diocese of South Carolina, Exhibit 5;
- e. R-6 specifically references certain actions and resolutions of the Diocese of South Carolina taken between 2009 and November 2012 and they “were declared in a Special Convention January 26, 2013 to be null and void ...” The Resolution

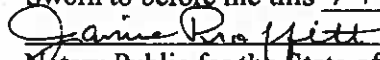
makes certain additions and deletions from the Constitution and Canons of the Diocese. The Resolution purported that "Due to a judicial restriction placed the Diocese, these amendments are being adopted under the working name of the Diocese, The Episcopal Church in South Carolina. In the event that the Diocese is instructed or otherwise authorized to change its name, the documents may be revised administratively to substitute the name." The exhibit to this resolution was the modifications to the Constitution and the Canons.

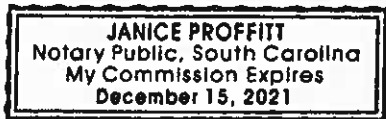
FURTHER, THE AFFIANT SAYETH NOT.

March 19, 2013

  
Karen Kusko

Sworn to before me this 19 day of March, 2013

  
Notary Public for the State of South Carolina  
My Commission expires: 12/15/21



*Exhibit 1*



**The Episcopal Church in South Carolina**  
**The 222<sup>nd</sup> Diocesan Convention – Second Business Session**  
**Grace Church, Charleston**

**Saturday, March 9, 2013**

**8:00 AM** Registration begins and continues until 9 AM

**8:00 AM** Church open for prayers

**9:00 AM** Call to Order

The Rt. Rev. Charles G. vonRosenberg  
Provisional Bishop of The Episcopal Church in South Carolina

Welcome of Special Guests

The Rt. Rev. Charles G. vonRosenberg

Report of Committee on Credentials  
Chairman, Clergy Credentials Committee

The Rev. Dow Sanderson

Certification of quorum  
Approval of Agenda

The Ven. Calhoun Walpole  
Secretary of Convention

Report of Committee on Resolutions

Ms. Melinda Lucka  
Chairman, Resolutions Committee

Report of Committee on Parishes and Missions

The Rev. Dr. Wilmot T. Merchant, II  
Chairman, Standing Committee

Bishop's Address

The Rt. Rev. Charles G. vonRosenberg

Introduction, Discussion, and Action on Proposed Changes  
to Diocesan Canons and Constitution

Ms. Melinda Lucka  
Chair, Constitution and Canons Committee

Update on Litigation  
Chancellor

Mr. Thomas S. Tidale

Confirmation of Nominations to Commission on Ministry

The Rt. Rev. Charles G. vonRosenberg

Report of Nominating Committee

Ms. Erin Bailey  
Chairman, Nominating Committee

Election of Trustees of The Episcopal Church in South Carolina  
Election of Ecclesiastical Court

Ballot 1

Mr. Rob Donahue  
Head Teller

Bishop's Appointments to Board of Examining-Chaplains

The Rt. Rev. Charles G. vonRosenberg



**Report of the Treasurer**

**The Rev. Jim Taylor**  
**Diocesan Treasurer**

**Presentation and Approval of Budget**

**Report of Institutions**

**The Rt. Rev. Charles G. von Rosenberg**

**Report of the Committee on Bishop's Address**

**Ms. Dolores Miller**  
**Member of Florence Worshipping Community**  
**and Former Chair of Finance Committee of Diocese**

**Report of Neurology**

**The Rev. Roy Hills**  
**Chairman, Neurology Committee**

**Report of the Committee on Courtesy**

**Ms. Melinda Lucka**

**Report of the Convention Committee & Invitation to**  
**223<sup>rd</sup> Diocesan Convention**

**The Rev. Rick Lindsey**  
**Chairman, Convention Committee**

**Installation of the Chancellor**  
**Celebration of a New Ministry for the Archdeacon**

**The Rt. Rev. Charles G. von Rosenberg**

**Report of Agenda and Dispatch of Business**

**The Rev. Colton Smith**  
**Member, Standing Committee**

**Adjournment with Benediction**

**(Lunch Immediately following in Manhattan Hall)**