

**HEARING PANEL OF THE DISCIPLINARY BOARD OF THE  
EPISCOPAL CHURCH IN CONNECTICUT**

<b>THE EPISCOPAL CHURCH IN CONNECTICUT</b>	}	
<b>V</b>	}	<b>Respondent's Response to the</b>
<b>THE REVEREND AMJAD SAMUEL</b>	}	<b>Church Attorney's Motion to</b>
<b>RESPONDENT</b>	}	<b>Remove from the List of</b>
	}	<b>Complainants in this Matter</b>
	}	<b>████████████████████</b>
	}	<b>in the Discovery Plan and</b>
	}	<b>Scheduling Order</b>

**ECCT Title IV Matter 2021-1**

The Respondent, The Reverend Amjad J. Samuel, through his counsel, provides this response to the Motion filed on behalf of The Episcopal Church in Connecticut ("ECCT"), through their counsel requesting that the Hearing Panel remove from the list of Complainants in this matter ██████████ in the Discovery Plan and Scheduling Order jointly submitted to the Panel and subsequently issued by the Reverend Joseph Shepley, President of the Hearing Panel.

In the Motion, the Church Attorney has written that:

I        *“In support of this motion ECCT states that ██████████ has consistently maintained from the time of ██████ first interview with the Intake Officer that ██████ did not want to be identified as a Complainant. Counsel for ECCT inadvertently listed ██████████ as a Complainant in the Discovery Plan and Scheduling Order jointly submitted by ECCT and Respondent to the Panel and subsequently issued by the Panel. ECCT submits that ██████████ should not be penalized because of Counsel's error.”*

However, the Church Attorney has provided no documentation to support such claims. He has provided no certifications from the ECCT, ██████████, the Intake Officer, the investigator or even himself to support his assertions. The Statement of [Alleged] Offenses and The Notice of the Hearing Panel was emailed to Respondent's Counsel on February 2,2022 over six (6) months ago. ██████████ was identified in that document by ██████ job title. That document was posted on the Diocesan website long ago. ██████████ did not come forward to seek to have ██████ identity or status removed through all that time. It should also be noted that the Church Attorney does not represent ██████████ or any of the other Complainants in this Matter.

The Church Attorney further states:

*“Moreover, Respondent will not be prejudiced by the allowance of this motion. ██████████ was and remains a witness in this matter. ██████ was included in ECCT's Mandatory Disclosure of Witnesses, and all documentary materials relating to ██████, including the Intake Officer's report of*

her interview of [REDACTED] and the interview notes prepared by the Church Attorney and the Investigator, have been provided to Respondent's Counsel.”

Unfortunately, what the Church Attorney has stated is untrue. Canon IV.13.5(d) provides, “The Scheduling Order shall provide the Church Attorney and Respondent’s Counsel authorization to take up to two depositions and propound up to twenty Interrogatories regarding each Complainant.”

If the Hearing Panel were to grant the ECCT’s Motion, Respondent would lose up to two depositions and twenty written Interrogatories. That alone prejudices the Respondent and his Counsel in preparing an appropriate defense.

Additionally, Canon IV.19.18. provides, “Except as otherwise provided in this Title, or except for good cause shown as determined by the Hearing Panel, it shall be the duty of all members of the Church to appear and to testify or respond when duly served with a notice to do so from any Panel in any matter arising under this Title.”

Notwithstanding Canon IV.19.18., there is no subpoena power in the Title IV process. If [REDACTED] fails or refuses to cooperate or appear, there is nothing that Counsel for the Respondent, the Church Attorney, or even the Hearing Panel can do to compel [REDACTED] to do so.

Based upon the foregoing, Respondent, The Reverend Amjad J. Samuel respectfully requests that this motion be denied in its entirety. However, if Reverend Shepley, in his capacity as the President of the Hearing Panel is inclined to grant the Motion filed by the Church Attorney, Respondent respectfully requests that he be allowed to take the two depositions and propound the up to twenty written Interrogatories as though [REDACTED] were still a Complainant. Additionally, Respondent respectfully requests that if this motion is granted, that should [REDACTED] fail or refuse to cooperate fully regarding [REDACTED] deposition, interrogatories or testifying at the Hearing, that any and all charges relating to [REDACTED] be dismissed with Prejudice.

Faithfully,

Michael F. Rehill J.D., D.D.  
Counsel for Respondent

cc: Donald Allison, Church Attorney  
The Rev. Amjad J. Samuel, Respondent  
Dr. Pamela L. Lutz, LL. D., Advisor to Respondent