

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

In Re

**The Right Reverend CHARLES
E. BENNISON, JR.,**

Respondent

VERIFIED COMPLAINT

To: The Presiding Bishop of the Episcopal Church
The Episcopal Church Center 815 Second
Avenue New York, New York

We the undersigned, each being a Priest, Deacon or adult communicant in good standing of the Episcopal Church, pursuant to the provisions of Canon IV.3.23(a)(2), make the following charges against the Rt. Reverend Charles E. Bennison, Jr., Bishop of the Diocese of Pennsylvania:

1. At all times herein relevant, Charles E. Bennison, Jr., was and is the Bishop of the Diocese of Pennsylvania.
2. Beginning at least as early as 2000, Bishop Bennison has repeatedly usurped the canonical prerogatives and authority of the Standing Committee of the Diocese of Pennsylvania as established under the Constitution and Canons of the Diocese.
3. For example, Canon 13.3 of the Diocese of Pennsylvania requires the prior approval of the Standing Committee with respect to any use or conveyance of any property, real or personal, which has been bequeathed, devised, conveyed or given to the Diocese and further requires such approval with respect to the use of the income from any and all such property.
4. The Rt. Reverend Charles E. Bennison, Jr., has repeatedly usurped the authority of the Standing Committee established under Canon 13.3 and misappropriated and expended assets of the Diocese, without canonical authority and without the required consent of the Standing Committee. For Example,
 - A. Pursuant to the Constitution and Canons of the Diocese of Pennsylvania, the Standing Committee and the Bishop exercise joint authority over funds bequeathed to the Diocese by Maud, Wilhelmina and Edward Sayers (hereinafter "the Sayers Fund.").

- B. Under the Constitution and Canons of the Diocese of Pennsylvania, no expenditure of any of the funds in the Sayers Fund were permissible without the express consent of both the Bishop and the Standing Committee.
 - C. As of December 31, 2004, the funds in the Sayers Fund totaled \$15,716,910.00
 - D. The Rt. Reverend Charles E. Bennison, Jr., usurped the authority of the Standing Committee over the Sayers Fund, and misappropriated the funds therein, expending those funds without canonical authority and without the required consent of the Standing Committee.
5. Bishop Bennison has similarly usurped the authority of the Standing Committee established under Canon 13.3 and misappropriated and expended other endowment funds of the Diocese, including unrestricted net assets without canonical authority and without the required consent of the Standing Committee.
 6. To date in excess of \$ 10 million of unrestricted net assets were expended without canonical authority and without the consent of the Standing Committee.
 7. Prior to the Special Convention of March of 2006, Bishop Bennison expended an additional \$350,000.00 of unrestricted net assets of the Diocese without canonical authority and without the required consent of the Standing Committee.
 8. A special audit of a sample of "unrestricted" endowment funds was conducted by an independent auditor which concluded that substantial funds had been improperly withdrawn and used, and recommended that they be repaid.
 9. Under Canon 7.2.1 of the Diocese of Pennsylvania, the Standing Committee annually determines the amount to be expended for support of the episcopate in the Diocese, upon which the annual assessments of parishes, missions and chapels of the Diocese are established by Diocesan Convention.
 10. The Rt. Reverend Charles E. Bennison, Jr., contrary to the Canons of the Diocese of Pennsylvania, has repeatedly expended funds ostensibly "for the support of the episcopate" which exceed the amounts approved by the Standing Committee.
 11. Bishop Bennison has systematically dismantled independent controls and oversight of financial matters; has withheld important information from those having canonical responsibilities; and has refused to consult with others on major decisions which affect the welfare of the Diocese.
 12. Bishop Bennison has refused to follow the decisions of Convention, and has repeatedly refused to advise the Diocesan Council as to the concerns of the Standing Committee regarding the misuse of diocesan funds under the authority of the

Standing Committee.

13. The improper actions of Bishop Bennison as aforesaid have created a total breakdown of trust within the Diocese. The consequences of these improper actions threaten the present and future financial stability of all of the ministries of the Diocese of Pennsylvania and the people that they serve.

It is respectfully submitted that the aforesaid conduct by The Rt. Reverend Charles E. Bennison, Jr. constitutes "Violation of the Canons of the General Convention"; "Violation of the Canons of the Diocese of Pennsylvania"; and "Conduct Unbecoming a Member of the Clergy" in violation of Canon IV. 1.1 (e), (f) and (j), and we, the undersigned, respectfully pray that this matter be presented to the Review Committee for investigation and Presentment. Each person signing this complaint does so after having investigated the matters set forth in the complaint and by signing this complaint asserts that they are true to the best of each signer's knowledge and belief.

The Rev. William H. Wood, m
Priest, Diocese of Pennsylvania
President of the Standing Committee

The Rev. Mary E. Laney Priest, Diocese
of Pennsylvania Vice President of the
Standing Committee

Arlene McGurk
Communicant, Diocese of Pennsylvania
Secretary of the Standing Committee

William Powell
Communicant, Diocese of Pennsylvania
Member of the Standing Committee

The Rev. Glenn M. Matis Priest,
Diocese of Pennsylvania Member
of the Standing Committee

Diane-Louise Wormley Communicant,
Diocese of Pennsylvania Member of the
Standing Committee

The Rev. Samuel Adu-Andoh
Priest, Diocese of Pennsylvania
Member of the Standing Committee

Christopher Hart
Communicant, Diocese of Pennsylvania
Member of the Standing Committee

The Rev. Isaac Miller
Priest, Diocese of Pennsylvania
Member of the Standing Committee

Joseph Suprenuk
Communicant, Diocese of Pennsylvania
Member of the Standing Committee

STATE OF PENNSYLVANIA :
 : ss.:
COUNTY OF :

I CERTIFY that on _____, 2006, The Rev. William H. Wood, m, personally came before me and acknowledged under oath, to my satisfaction, that he: (a) personally signed this complaint; and (b) signed, sealed and delivered this complaint as his act and deed having investigated the matters set forth in the complaint and that the allegations contained herein are true to the best of the signer' s knowledge and belief.

STATE OF PENNSYLVANIA :
 : ss.:
COUNTY OF :

I CERTIFY that on _____, 2006, The Rev. Mary E. Laney personally came before me and acknowledged under oath, to my satisfaction, that she: (a) personally signed this complaint; and (b) signed, sealed and delivered this complaint as her act and deed having investigated the matters set forth in the complaint and that the allegations contained herein are true to the best of the signer' s knowledge and belief.

STATE OF PENNSYLVANIA :
 : ss.:
COUNTY OF :

I CERTIFY that on _____, 2006, Arlene McGurk personally came before me and acknowledged under oath, to my satisfaction, that she: (a) personally signed this complaint; and (b) signed, sealed and delivered this complaint as her act and deed having investigated the matters set forth in the complaint and that the allegations contained herein are true to the best of the signer' s knowledge and belief.

STATE OF PENNSYLVANIA :
 : ss.:
COUNTY OF :

I CERTIFY that on _____, 2006, William Powell personally came before me and acknowledged under oath, to my satisfaction, that he: (a) personally signed this complaint; and (b) signed, sealed and delivered this complaint as his act and deed having investigated the matters set forth in the complaint and that the allegations contained herein are true to the best of the signer' s knowledge and belief.

STATE OF PENNSYLVANIA :
 : ss.:
COUNTY OF :

I CERTIFY that on _____, 2006, The Rev. Glenn M. Matis personally came before me and acknowledged under oath, to my satisfaction, that he: (a) personally signed this complaint; and (b) signed, sealed and delivered this complaint as his act and deed having investigated the matters set forth in the complaint and that the allegations contained herein are true to the best of the signer' s knowledge and belief.

STATE OF PENNSYLVANIA
 ss.
COUNTY OF

I CERTIFY that on _____, 2006, Diane-Louise Wormley personally came before me and acknowledged under oath, to my satisfaction, that she: (a) personally signed this complaint; and (b) signed, sealed and delivered this complaint as her act and deed having investigated the matters set forth in the complaint and that the allegations contained herein are true to the best of the signer' s knowledge and belief.

STATE OF PENNSYLVANIA

ss.

COUNTY OF

I CERTIFY that on _____, 2006, The Rev. Samuel Adu-Andoh personally came before me and acknowledged under oath, to my satisfaction, that he: (a) personally signed this complaint; and (b) signed, sealed and delivered this complaint as his act and deed having investigated the matters set forth in the complaint and that the allegations contained herein are true to the best of the signer' s knowledge and belief.

STATE OF PENNSYLVANIA

ss.

COUNTY OF

I CERTIFY that on _____, 2006, Christopher Hart personally came before me and acknowledged under oath, to my satisfaction, that he: (a) personally signed this complaint; and (b) signed, sealed and delivered this complaint as his act and deed having investigated the matters set forth in the complaint and that the allegations contained herein are true to the best of the signer' s knowledge and belief.

STATE OF PENNSYLVANIA :
 : ss.:
COUNTY OF :

I CERTIFY that on _____, 2006, The Rev. Isaac Miller personally came before me and acknowledged under oath, to my satisfaction, that he: (a) personally signed this complaint; and (b) signed, sealed and delivered this complaint as his act and deed having investigated the matters set forth in the complaint and that the allegations contained herein are true to the best of the signer' s knowledge and belief.

STATE OF PENNSYLVANIA
 ss.
COUNTY OF

I CERTIFY that on _____, 2006, Joseph Suprenuk personally came before me and acknowledged under oath, to my satisfaction, that he: (a) personally signed this complaint; and (b) signed, sealed and delivered this complaint as his act and deed having investigated the matters set forth in the complaint and that the allegations contained herein are true to the best of the signer' s knowledge and belief.
