

EXHIBIT “1”

St. Paul's Accomplishments September 2020 - January 2024

Vestry and Mutual Ministry Accomplishments at St. Paul's have been significant over the past two and a half years under Respondent's leadership. Of note, these accomplishments occurred in a parish that journeyed through the Covid-19 pandemic of 2020 – 2021, a publicized Title IV matter in 2022 that was later dismissed following investigation, and the following year of 2023. During that period of time the Vestry, Respondent, and congregation continued, restarted, and developed new mission and ministry opportunities noted here:

1. Created and ratified a five-year, seven-point Strategic Framework (2022) and two-year, nine-point Action Plan (2023)
2. Elected a Rector (2023)
3. Continuous employer taking advantage of PPP and other available funds to off-set labor costs. Never closed the church.
4. Landmark stewardship/giving in 2020, 21, 23 - cut deficit by half in 2023, and expect deficit of 73k in 2024 (half of 2023)
5. 30% increase in attendance in 2022 (as reported by the Living Church)
6. Started Sunday night Eucharist and Small Groups, using recognized "Being With" curriculum from St. Martin's in the Fields. Plans to expand to home-based discipleship groups Summer 2024
7. Developed and installed a 25k livestreaming system (2020-21)
8. Had successful on-line children and youth programs and transitioned them to in-person.
9. Growth in youth ministries & Vacation Bible School
10. Completed \$89k digital upgrade to Austin Organ
11. Growth in Newcomer & Hospitality Ministries (Began celebrating birthdays once a month at coffee hour in late 2022)
12. Growth in Parish Activities, e.g. Night Before Thanksgiving Spaghetti Dinner (2021-2023), Anglican Christmas Festival (2023), Easter Vigil party (2022, 2023), St. Patrick's Kaylee (2024).
13. Restarted Monthly Movie Night
14. Remodeled and installed historic baptismal font in Church Narthex
15. Invested in church's first set of eucharistic vestments that match current paraments
16. No reported COVID cases of transmission during entire pandemic
17. Little Acorn Academy signed 10-year lease (2021)
18. Installed playground with Little Acorn Academy
19. Renovated rental duplex
20. Redesigned logo and Sunday Bulletin
21. Hosted successful "Drive Through" Nativity in 2020
22. Held Parish Picnic in Parish Hall along with a Ministry Mall
23. Restarted "St. Paul's Presents" committee, Pastoral Care, and the formation of the Health Advisory Committee
24. Begin preparing for St. Paul's Centenary (2025)

Specific contributions to the mutual ministry accomplishments including and in addition to those noted above by Respondent in his capacity as Pastor, Priest and Teacher to St. Paul's and with Vestry support include the following:

1. Reorganized Vestry & Staff leadership and Instituted mutual ministry, staff, and leadership review process
2. Implemented Mutual Ministry Vestry training in Spring 2023
3. Developed a Sunday night Eucharist/Taize service and discipleship program beginning September 2023
4. Offered Morning Prayer almost every weekday morning since fall 2020
5. Restarted Mid-week Eucharist (Tuesday noon)
6. Launched monthly Eucharist and brunch for Senior members of the parish (January 2024)
7. Hosted Youth Mental Health panel discussion (Spring 2021)
8. Hired Cara Geerlings, Music Director (2021) and rebuilt Choral Program
9. Started seasonal Choral Evensong Program
10. (Re)introduced seasonal liturgies and feasts (e.g. Memorial Day, Veterans Day, All Souls, Season of Remembrance, Patronal Feast/Conversion of St. Paul)
11. Dedicated side altars in association with Season of Remembrance
12. Invited Pastor Meshach Kanyion as guest preacher to speak about Race in response to congregant requests to address Critical Race Theory
13. Created a new parish community communication app Summer 2023
14. Coordinated Anglican Christmas Festival (Advent 2023), hosting hundreds of members of the Dayton/Oakwood community (featured in Dayton Daily News and ABC 22)
15. Fostered local community engagement through Adult Education, activities with Daybreak Youth Services, Catholic Social Services of Miami Valley, Dakota Center, and the Feast of Mary Magdalene Eucharist (July 2023)
16. Expanded outreach to Canterbury Court (Episcopal Retirement Services senior living community in the Dayton area). Noted record attendance from Canterbury Court residents at St. Paul's events
17. Started lay commissioning tradition in 2021, commissioning special volunteers, Altar Guild, Acolytes, and Vestry
18. Met with 100+ parishioners in late 2021 - early 2022 for Coffee Chats
19. Planned and hosted Adult Formation on Sunday Mornings from 2021 - 2023, including multi-week series on Outreach, the Work of the Holy Spirit, the Prayers of the People, and the Book of Common Prayer
20. Offered "Ask a Priest Anything" Sessions between Eucharistic services on a seasonal basis.
21. Invited as speaker on Christian Spirituality and Anglicanism at Oakwood High School 2022, 2023, 2024
22. Baccalaureate Speaker at Oakwood High School, May 2023
23. Hosted Scholar Priest gathering about parish ministry at St Paul's (Oct. 2021)
24. Supervised upgrades to organ, including modifications of physical plant
25. Hired Sher Patrick as our new Communications Director
26. Facilitated Staff Retreat at All Saints, New Albany (2022)
27. Partnered with Dayton Yoga Club to take up residence at St. Paul's (Fall 2023)
28. Offered weekly "Ask a Theologian" zoom conversations during pandemic and started making informal teaching and communication videos (Summer 2023)
29. Preached several sermon series from 2020-2024, including "The Psalms" (Summer 2023)
30. Offered Lent and Advent Discussion groups beginning 2020
31. Coordinated Vacation Bible School & youth volunteerism 2021 and 2023

32. Created summer seminarian internship program 2021 supported by \$30k Diocesan Commission on Congregational Life (COCL) grant for this initiative
33. Instituted volunteer Verger program and trained first two Vergers
34. Coordinated music ministry with Randy Young from January - September 2021
35. Restarted Men's group, and launched Women's Group with Cara Geerlings
36. Taught for the General Theological Seminary through Spring 22, and for University of Dayton's Religion Dept. Summer 2021, Spring 2022, and Spring 2023.

EXHIBIT “2”

LETTER OF AGREEMENT

A Covenant

Between

The Wardens and Vestry of St. Paul's Episcopal Church, Dayton, Ohio

and

The Reverend Dr. Daniel Wade McClain

who has been elected Rector with the approval of Bishop George Wayne Smith (the "Bishop") for the period beginning on May 1, 2023 (the "Start Date") with the understanding that this tenure is to continue until dissolved by mutual consent or by arbitration and decision as provided by the relevant Canons of the Diocese of Southern Ohio (the "Diocese") and of The Episcopal Church.

PREAMBLE

The Reverend McClain, as Rector, shall lead the Parish as pastor, priest and teacher, sharing in the councils of the Parish and of The Episcopal Church, in communion with the Bishop. By word and action, informed at all times by the Holy Scriptures, the *Book of Common Prayer*, and the Constitution and Canons of The Episcopal Church and the Diocese, the Rector shall proclaim the Gospel, love and serve Christ's people, nourish them, and strengthen them to glorify God in this life and in the life to come.

This ministry shall be further described in a Rector Position Description, which has the mutual approval of the Reverend McClain and the Vestry, which the parties will work to complete on or before the ninetieth (90th) day following the Start Date. When the Rector Position Description is completed, it shall be considered part of this Letter of Agreement.

VESTRY RESPONSIBILITIES

All ministries other than those reserved to ordained leadership (such as administering the sacraments) are understood as mutual ministries of the laity of the Parish and the Reverend McClain as Rector. The Vestry shall lead the laity to support and cooperate with the Rector in pursuit of the Parish's goals and in the performance of the mission, ministry, and developmental tasks of the Parish.

The Vestry will see that the Reverend McClain, as Rector, is properly supported, personally and organizationally, as well as in the Vestry's financial obligations to the Rector.

The Vestry will participate in the Mutual Ministry Review described in Section G below.

Section A – Times of Work and Leave

1. The Rector's work includes not only activities directed to the Parish and its well-being, but also labors on behalf of the Diocese and community. The scheduled work week is five days. In general, no more than three evenings per week are expected. The Rector is expected to preserve at least two days each week solely for personal and family use. Time away is to be coordinated with the Wardens.
2. The Rector will have the following periods of leave at full compensation:
 - (a) Federal holidays, to be taken so as not to interfere with worship for major occasions.
 - (b) Vacation consisting of 31 days per calendar year, which shall include five Sundays and is inclusive of the periods preserved for the Reverend McClain's personal and family use each week. Vacation time is to be coordinated with the Wardens. No more than ten days and two Sundays may be carried forward to the next calendar year.

- (c) Professional Development Leave, at the rate of two weeks per calendar year.
- (d) Forty days, including eight Sundays, of family leave for the period immediately surrounding the birth/adoption of a child or the need to care for a parent, beginning at a time decided by the Reverend McClain. If eligible, the Rector shall utilize short-term disability benefits provided by the Church Pension Group. The Vestry shall provide for the salary amount of the cleric not covered by short-term disability benefits.

Vacation and Professional Development Leave will be prorated for partial calendar years.

In addition, the Rector shall receive two weeks per year of service to the Parish for sabbatical leave, to be available after the end of the second year of service. In recognition of the Reverend McClain's service to the Parish as priest-in-charge since September 1, 2020, eight weeks of sabbatical leave as a one-time benefit up front will be added to the total two weeks accrued annually beginning on the Start Date. The Reverend McClain will be paid full salary and benefits during sabbatical leave. Sabbatical leave arrangements shall be made in full consultation with the Vestry, to ensure benefits for the Parish as well as the Rector. The Parish shall contribute an amount equal to two weeks' compensation to a designated sabbatical fund each year. The purpose of the fund is to allow the Parish to fund the Rector's leave as well as to assist in obtaining adequate clergy coverage during the sabbatical leave.

Section B – Compensation and Benefits

The Rector's total annual compensation will be [REDACTED] which will include half of the Rector's expense under the Self Employment Contribution Act of 7.65%.

A portion of the compensation may be designated as housing allowance that is excluded from federal gross income in accordance with Section 107 of the Internal Revenue Service Code and regulations promulgated thereunder. The Rector should coordinate the designation of the amount of this allowance with the Vestry.

The Reverend McClain's compensation shall be increased 3% annually, unless the staff of the church receive a cost of living increase, in which case the Reverend McClain's compensation increase shall be whichever amount is greater. Compensation will be reviewed and adjusted annually in light of recommendations from the Diocesan Council and the current Diocesan clergy compensation guidelines.

The Reverend McClain shall receive the following benefits:

- Church Pension Fund Assessment on the sum of the total annual compensation (including Housing Allowance and SECA reimbursement). Other taxable benefits may affect the amount of the Church Pension Fund Assessment and should be made clear during the Parish's budget process.
- Medical insurance according to the High Deductible/HSA plan and Dental plus Ortho insurance, according to the group plan provided through the Diocese for Employee plus Family.
- HSA deductible contribution of \$4000 annually
- Group Life and Accidental Death and Dismemberment Insurance, as provided by the group plan provided through the Church Pension Fund.
- Workers' Compensation Insurance, as provided by Ohio law.

All annual amounts in Section B will be prorated for partial calendar years.

Section C – Expenses

The Vestry shall pay the following expenses incurred by the Rector in fulfilling the duties of his office:

1. Travel expenses, including mileage to be reimbursed at the per-mile rate set by the Internal Revenue Service, plus out-of-pocket costs of parking fees, tolls, bus fares, etc. not to exceed \$1200 annually.
2. The normal expenses of church office operation, such as telephone, postage, office equipment, supplies, secretarial services, etc.

3. An expense allowance up to \$2,000.00 annually for reimbursement of expenses, excluding travel expenses, incurred in the course of professional activities on behalf of the Parish, to be reviewed annually.
4. \$100.00 monthly toward the cost of a plan for a cellular phone in lieu of a telephone in the Reverend McClain's residence. The telephone number will be published to ensure the Rector's ready accessibility in case of emergencies. The Rector will pay the cost of any additional services beyond the amount set forth above.
5. Annual Continuing Education allowance of \$1,250.00 for expenses incurred in relation to the Professional Development Leave, referenced above. Unexpended portions of this allowance shall be allowed to accumulate for use in succeeding years up to six years to be used during a sabbatical leave.

All annual amounts in Section C will be prorated for partial calendar years.

Section D – Discretionary Fund

In accordance with the Canons of the General Convention, a "Discretionary Fund" is to be established under the Reverend McClain's sole control, as Rector, but subject to the terms hereof, from the following sources: gifts given for the purposes of the Discretionary Fund. The Discretionary Fund account shall be opened in the name of the Parish (not the clergy person) using the Parish's Federal Employee Identification Number (FEIN). The Discretionary Funds is subject to annual audit per Diocesan policy and shall be included in the Parish's financial records. The use of Discretionary Funds is to assist the poor of the Parish and the larger community and for related purposes. Wherever possible it is preferable that payments for rent, utilities, medical care and the like be made directly to the provider rather than to individual beneficiaries of the Discretionary Fund.

Section E – Supplementary Compensation

The Reverend McClain shall not charge fees for performing any rites of The Episcopal Church (for example, baptisms, marriages, funerals) for members of the Parish. The Reverend McClain may, however, receive income from other sources, such as:

- Sacramental services on behalf of persons not in any way related to the Parish.
- Compensation for professional services performed on personal time for groups unrelated to the Parish, or for sermons, books or articles published outside the Parish.

Section F – Use of Buildings and Facilities

The Rector shall have the use of the building(s) of the Parish as described in the Canons of The Episcopal Church.

Section G – Mutual Ministry Review

The Rector, Wardens, and Vestry agree to a regular discussion and mutual review of the total ministry of the Parish, in order to:

- Provide the Rector and Vestry opportunity to assess how well they are fulfilling their responsibilities to each other and to the ministries they share.
- Establish goals for the work of the Parish for the coming year.
- Identify areas in the ministry that need more attention, to assure ongoing mutuality in the ministry.
- Clarify expectations of all parties to help keep the ministry healthy.
- Ensure proper support of the Rector.
- Plan and prepare for the Rector's sabbatical to ensure benefits for the Parish and the Reverend McClain during his tenure as Rector.

A mutually agreed upon third party from outside the Parish will be engaged to facilitate the mutual ministry review process. The Office for Transitions for the Diocese can provide recommendations of facilitators.

Section H – Other Agreements

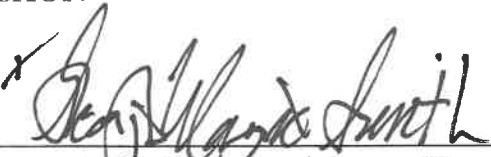
1. All compensation and benefits shall become effective on the Start Date, defined above, unless delayed by adverse circumstances in consultation with the Wardens.
2. This Letter of Agreement and the Rector Position Description (referenced above once completed), shall be made part of the minutes of the next Vestry meeting following signing, and copies shall be given to each Vestry member.
3. In the event of the Reverend McClain's death while this Letter of Agreement is in effect, the Vestry agrees to continue payment of the Reverend McClain's cash salary and medical and dental insurance coverages set forth herein, to the Reverend McClain's designated beneficiary, namely his sons, Charles Henry Wade McClain, Jude Rowan McClain, Felix Ambrose McClain, and Ezra James Francis McClain for a period of two months.
4. This Agreement shall supersede and replace any and all agreements, written or oral, express or implied, between the Reverend McClain and St. Paul's Episcopal Church or any related or predecessor organization, relating to the terms or conditions of the Reverend McClain's appointment. This Agreement constitutes the complete understanding between the parties, except as may be supplemented by other agreements or handbooks related to the Reverend McClain's appointment.
5. This Letter of Agreement may be revised only by mutual agreement of the parties and permission of the Bishop, except that compensation and expenses revisions may be mutually agreed upon in a separate budget process of the Parish
6. If the Rector and the Vestry are in disagreement concerning interpretation of this Letter of Agreement, either party may appeal for mediation to the Canon to the Ordinary, or another mutually agreed upon third party, with the Bishop remaining the final arbiter.

[Signature Page Follows]

[SIGNATURE PAGE TO LETTER OF AGREEMENT]


This Letter Agreement was approved by and entered into as of MAY 31, 2013

BISHOP:



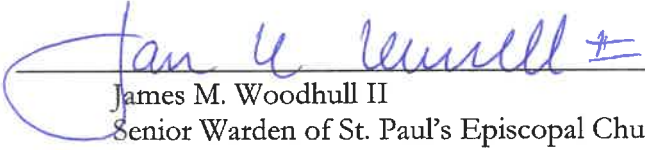
The Right Reverend George Wayne Smith
Bishop Provisional of the Diocese of Southern Ohio

RECTOR:




The Reverend Dr. Daniel Wade McClain

SENIOR WARDEN:



James M. Woodhull II
Senior Warden of St. Paul's Episcopal Church

Reviewed By:



The Rev. Canon Michael P. Spencer
Canon for Transitions and Congregational Ministry

EXHIBIT “5”



This blue section is your Earnings Summary which provides more detailed information on the generation of your W-2 statement. The reverse side includes instructions and other general information.

Employee Reference Copy W-2 Wage and Tax Statement 2020. Copy C for employee's records. Control number 001033 CLIF/1DA. Employer use only A 6. Employer's name, address, and ZIP code: ST PAUL'S EPISCOPAL, 33 W. DIXON AVE, DAYTON OH 45419. Batch #03836. Employee's name, address, and ZIP code: DANIEL W MCCLAIN. Employer's FED ID number, Employee's SSA number, Wages, tips, other comp. 52654.08, Federal income tax withheld 3848.06, Social security wages, Social security tax withheld, Medicare wages and tips, Medicare tax withheld, Social security tips, Allocated tips, Nonqualified plans, Other 10000.00 HOUSE 2320.72 SECA, State OH 51-0690134, State wages, tips, etc. 52654.08, State income tax 638.96, Local wages, tips, etc. 52654.08, Local income tax 566.32, Locality name OAKWOOD.

1. Your Gross Pay was adjusted as follows to produce your W-2 Statement.

Table with 5 columns: Wages, Tips, other Compensation Box 1 of W-2; Social Security Wages Box 3 of W-2; Medicare Wages Box 5 of W-2; OH. State Wages, Tips, Etc. Box 16 of W-2. Rows include Gross Pay (62,654.08), Less Misc. Non Taxable Comp. (10,000.00), Less Exempt Wages (N/A), and Reported W-2 Wages (52,654.08).

2. Employee Name and Address.

DANIEL W MCCLAIN

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Form 1: Wages, tips, other comp. 52654.08; Federal income tax withheld 3848.06; Social security wages; Social security tax withheld; Medicare wages and tips; Medicare tax withheld; Control number 001033 CLIF/1DA; Employer's name, address, and ZIP code: ST PAUL'S EPISCOPAL, 33 W. DIXON AVE, DAYTON OH 45419; Employee's name, address and ZIP code: DANIEL W MCCLAIN; State OH 51-0690134; State wages, tips, etc. 52654.08; State income tax 638.96; Local wages, tips, etc. 52654.08; Local income tax 566.32; Locality name OAKWOOD.

Form 2: Wages, tips, other comp. 52654.08; Federal income tax withheld 3848.06; Social security wages; Social security tax withheld; Medicare wages and tips; Medicare tax withheld; Control number 001033 CLIF/1DA; Employer's name, address, and ZIP code: ST PAUL'S EPISCOPAL, 33 W. DIXON AVE, DAYTON OH 45419; Employee's name, address and ZIP code: DANIEL W MCCLAIN; State OH 51-0690134; State wages, tips, etc. 52654.08; State income tax 638.96; Local wages, tips, etc. 52654.08; Local income tax; Locality name OAKWOOD.

Form 3: Wages, tips, other comp. 52654.08; Federal income tax withheld 3848.06; Social security wages; Social security tax withheld; Medicare wages and tips; Medicare tax withheld; Control number 001033 CLIF/1DA; Employer's name, address, and ZIP code: ST PAUL'S EPISCOPAL, 33 W. DIXON AVE, DAYTON OH 45419; Employee's name, address and ZIP code: DANIEL W MCCLAIN; State OH 51-0690134; State wages, tips, etc. 52654.08; State income tax 638.96; Local wages, tips, etc. 52654.08; Local income tax; Locality name OAKWOOD.

EXHIBIT “6”

Matthew S.C. Olver
2560 Webb Rd
Nashotah, WI 53058

23 February 2024
Ember Day

Ms. Stambaugh,

You asked me for a statement of opinion regarding whether a prayer for exorcism without the permission of the bishop was a violation of the Title IV Canons of The Episcopal Church. I make this statement in my individual capacity as a scholar of Anglican liturgy, as one experienced in the theology, rites, and practice of exorcism, and as a seminary professor who has taught canon law. It is not made on behalf of any organization, institution, diocese, or bishop. Except for the allegation about a canonical violation related to an exorcism, I have not reviewed and do not have a position on the allegations made against your client. I also have never met the priest in question (as far as I can recall) and have had no personal interactions with him.

I agreed to write this letter because I am concerned an incorrect and perilous precedent will be set if the priest in question is convicted of violating Title IV for seeking to undertake an exorcism of a place. There are three interrelated reasons for my view on the matter.

First and most straightforwardly, Canon IV.4.1 outlines the standard of conduct required of all ordained persons. The second of those, IV.4.1.b, is to “conform to the Rubrics of the Book of Common Prayer.” The Book of Occasional Services, which is the only place where exorcisms are addressed, is not the Book of Common Prayer nor does it carry any canonical authority. The Book of Common Prayer alone is of authority in this church. Canon IV.4.1.g states that all ordained persons must “exercise his or her ministry in accordance with applicable provisions of the Constitution and Canons of the Church and of the Diocese, ecclesiastical licensure or commission and Community rule or bylaws.” Unless the diocese has an explicit canon addressing exorcism, there is no way that undertaking an exorcism is in any way a violation of Title IV. It might have been unwise or imprudent – I have no knowledge of the context or reasons why the priest in question undertook the rite. But it is not a violation of Title IV.

Second, in the Western church, there has long been a distinction between what are often called “minor exorcisms” and “major exorcisms.” Many features of priestly ministry include what are often called “minor exorcisms:” the intercessions for the candidates within the rite for Holy Baptism in the BCP clearly fall under this category, as does priestly absolution, the Great Litany (e.g. “beat down Satan under our feet”), the prayers for Catechumens in the Book of Occasional Services (“O God, in your pity you looked upon a fallen world, and sent your Beloved Son among us to vanquish the powers of wickedness. Deliver N. and N. from bondage to sin and evil...”; p. 159) and even the celebration of the Eucharist, as the directions about exorcism in the Book of Occasional Services make clear: “The Celebration of the Eucharist, especially in a place that has been disturbed, and the prayer of the Great Litany, for example, are ordinary practices” [of the rituals of exorcism] (p. 233).

The Episcopal Church has, in its service for the “Celebration of a Home” in the various editions of the *Book of Occasional Services* included what it terms an “invocation” but which is clearly a minor exorcism: “Let the mighty power of the Holy God be present in this place to banish from it every unclean spirit, to cleanse it from every residue of evil, and to make it a secure habitation for those who dwell in it; in the Name of Jesus Christ our Lord. Amen” (p. 201). The rubrics do not direct the priest who decides to use this prayer to inform or receive permission from the bishop before using this prayer, even though the prayer is clearly and explicitly an exorcism of a place. Since this prayer is part of the very same book which gives the direction about exorcism, the only conclusion is that the logic which governed the compilation of the volume assumes a distinction between the sort of exorcism provided for in the Blessing of a Home and something more significant (i.e. a Major Exorcism) for which a priest should consult with the bishop.

Another precedent is in the first Book of Common Prayer of 1549, which included the following prayer as a normative part of the Baptism rite and whose use also did not require any permission from the bishop:

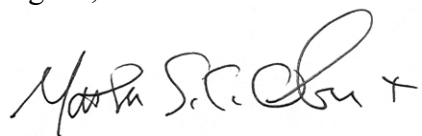
I command thee, unclean spirit, in the Name of the Father, and of the Son, and of the Holy Ghost, that thou come out, and depart from this person, whom our Lord Jesus Christ hath vouchesafe, to call to his Holy Baptism, to be made members of His Body, and of His holy congregation. Therefore, thou cursed spirit, remember thy sentence, remember thy judgment, remember the Day to be at hand, wherein thou shalt burn in fire everlasting, prepared for thee and thy angels. And presume not hereafter to exercise any tyranny toward this creature, whom Christ hath bought with his Precious Blood, and by this His holy Baptism hath called to be of his flock; in the Name of Jesus Christ.

In light of these two examples, I think it is reasonable to conclude that in the few instances where the English and American tradition of Anglicanism directly engages with exorcism, it follows the Western assumption that there are degrees of exorcism, some of which require the permission of the bishop and some which do not. Without any further authoritative direction about this distinction, there is no reasonable basis upon which to conclude that a priest who says a prayer of exorcism for a place is in violation of Title IV.

Finally, it is well known that many priests and bishops welcome unbaptized persons to receive Holy Communion in violation of Canon I.17.7. It is well known that many priests regularly change the words of the service of Holy Communion. Both of these violations concern the central, dominical Sacraments of the Church and yet are not prosecuted. To conclude that a priest who has violated the rubrics of a liturgy outside the Book of Common Prayer and which is not a sacrament or a sacramental rite, would be significantly disproportionate.

I hope that this background provides clarity about the matter in question. It is my judgment that this particular charge has no canonical warrant and that it would both be unwise and set a very dangerous precedent to conclude that a priest who exorcised a place was in violation of Title IV.

Signed,

A handwritten signature in black ink, appearing to read "Matthew S.C. Olver" with a stylized flourish at the end.

The Rev'd Matthew S.C. Olver, Ph.D.

EXHIBIT “8”

From: Daniel McClain <dwmclain@icloud.com>
Sent: Friday, February 16, 2024 10:59 AM
To: Deborah R. Stambaugh
Subject: Fwd: Request

Begin forwarded message:

From: Lori Babcock <loribabcock@verizon.net>
Date: February 16, 2024 at 10:58:19 AM EST
To: Daniel McClain <dwmclain@icloud.com>
Subject: Re: Request
Reply-To: Lori Babcock <loribabcock@verizon.net>

Hi Dan,
Yes, I am comfortable with my response being submitting on your behalf.
Prayers,
Lori

The Rev. Lori Hale Babcock, M.Div.
Interim Rector, Church of the Incarnation
600 Third Ave. N P.O. Box 3056
Great Falls, MT 59403
(o) 406-453-4167
(c) 406-750-2155

On Friday, February 16, 2024 at 07:48:17 AM MST, Daniel McClain <dwmclain@icloud.com> wrote:

Lori,
Thank you for your response.

My lawyer is asking if I may submit your response in my response to Title IV charges.

Yours, Dan

On Feb 2, 2024, at 12:16 PM, Lori Babcock <loribabcock@verizon.net> wrote:

Hi Dan,
First of all let me immediately reassure you that I never wrote such a thing. I have only fond memories of our working relationship, respect for your sincere desire to serve Christ and the church, and no awareness of anyone within the community of St. John's Mt. Washington who felt differently.

Second, I'm sorry to learn you are dealing with something that is unpleasant and sets off some alarm bells for me from just the little bit I know about it. I can't imagine that you would ever have gotten ordained if such an assessment had been made about you during your internship or preparation for ordination. I also am curious as to how anyone making a complaint about you in your current diocese had access to what should have been a confidential report from your ordination process - what? ten years ago?

This sounds like a terrible thing you are having to deal with and my best wishes and prayers that it resolves quickly are with you.

If I can provide any further help, support, empathy, whatever, please, please reach out.

My personal cell # 410-960-9179.

In Christ,

Lori

P.S. A couple of years ago I met and have become dear friends with former parishioners of yours at Bruton Parish: Nan and Leighton Strader. They remember you also with great regard.

The Rev. Lori Hale Babcock, M.Div.

Interim Rector, Church of the Incarnation

600 Third Ave. N P.O. Box 3056

Great Falls, MT 59403

(o) 406-453-4167

(c) 406-750-2155

On Friday, February 2, 2024 at 09:31:05 AM MST, Dan McClain <dan@stpauls-dayton.org> wrote:

Dear Mtr. Lori, I apologize for the abruptness of this request.

A complaint against me in the Diocese of Southern Ohio says a former supervisor referred to me as "as arrogant, dictatorial, ham-handed, and manipulative, noting that Respondent tended to "cut off" anyone who did not share his views." I am writing my two prior supervisors to ask whether you said that about me.

Thank you,

Dan

EXHIBIT “9”

From: Daniel McClain <danielmcclain@gmail.com>
Sent: Thursday, February 1, 2024 6:19 PM
To: Deborah R. Stambaugh; Lynn Carter Edmands
Subject: Fwd: Request

Begin forwarded message:

From: Scott Bellows <interim@stmarys-church.org>
Subject: Re: Request
Date: February 1, 2024 at 6:17:26 PM EST
To: Dan McClain <dan@stpauls-dayton.org>

No, Dan, that was definitely not me, nor would that description characterize my personal experience of you at any point throughout our time working together.

Be assured of my prayers as you traverse what sounds like a challenging time in your vocational/personal journey.

Faithfully,

Scott

On Thu, Feb 1, 2024 at 5:49 PM Dan McClain <dan@stpauls-dayton.org> wrote:

Dear Scott,

Forgive the abruptness of this request.

A complaint against me in the Diocese of Southern Ohio says a former supervisor referred to me as “as arrogant, dictatorial, ham-handed, and manipulative, noting that Respondent tended to “cut off” anyone who did not share his views.” I am writing my two prior supervisors to ask whether you said that about me.

Thank you,
Dan

--

The Rev Scott P Bellows, Interim Priest
St Mary's Episcopal Church
3055 Main St., P.O. Box 395
Barnstable, MA 02630
(508) 362-3977 office
(443) 858-6850 mobile

EXHIBIT “12”

**IN THE COMMON PLEAS COURT OF MONTGOMERY COUNTY, OHIO
DIVISION OF DOMESTIC RELATIONS**

KATHERINE E. McCLAIN

: CASE NO. 2022-DR-0353

[REDACTED]

: JUDGE DENISE L. CROSS

:

Plaintiff,

:

vs.

AGREED ENTRY

:

DANIEL W. McCLAIN

[REDACTED]

:

:

Defendant.

:

This matter is before the Court pursuant to an agreement between the parties. The parties hereby agree as follows:

1. Effective with the filing of this Entry, both parties shall be designated the temporary Custodians and Residential Parents of the minor children: [REDACTED]
2. Effective with the filing of this Entry, the parties shall follow a temporary parenting time schedule with the above named children which will be agreed upon between the parties. However, it is the intention for this to be equal in nature;

3. Effective with the filing of this Entry, Defendant shall be designated the temporary Custodian and Residential Parent of [REDACTED]
4. Effective with the filing of this Entry, all temporary parenting time between [REDACTED] and Plaintiff shall be as agreed upon between Plaintiff and [REDACTED]
5. Both parties shall immediately submit to a psychological evaluation utilizing the services of Drs Allison and Scott Deatherage, Columbus Counseling and Psychological Services;
6. If Defendant deems necessary, Defendant shall be authorized to sell the motorcycle. All equity from the sale shall be equally split between the parties;
7. If Defendant deems necessary, Defendant shall be authorized to sell the Ford Focus. All equity from the sale shall be put towards the purchase of a larger vehicle to better accommodate transportation of the minor children; and
8. The outstanding marital credit card debt will be paid off by Defendant's parents. However, the parties agree to be equally responsible for this debt and reimburse Defendant's parents at the conclusion of this case.

Read and approved.

Katherine McClain

Katherine E. McClain
Plaintiff

Daniel W. McClain
Defendant

David P. Mesaros (#0012725)
Adam R. Mesaros (#0089828)
MESAROS LAW OFFICE, LLC
7051 Clyo Road
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P: (937) 424-3658
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Attorneys for Defendant

Mesaros
Law Office

Attorneys at Law

7051 Clys Road
Centerville, Ohio 45459
937 424 3658
937 424 3659 Fax

EXHIBIT “13”

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JULY 18, 2019

The Church Cat

[Lisa G. Fischbeck](#)



The resident in the church house was getting tired of cleaning up the mess left behind by field mice in the kitchen. She also wanted some company. So she asked if the church might get a cat. The altar guild was having similar challenges with mouse detritus in the sacristy and was ready to support the idea. With the altar guild on board, the vestry was quick to assent.

The resident and I started visiting the local animal rescue. We knew that any cat we adopted would need to be tolerant of kids, so once we narrowed the possibilities down to two or three, we invited a 5 and 9-year-old from the church to go with us. Each cat was given the kid test for playful interaction and kindness.

The result was Smoke, the Advo-cat.

There is certainly a lot said about Episcopalians and their cats. Forward Movement's Episco-cats calendar has been a big hit for years. And there are stories told about the way stray cats will connect with a church and stay on for years. Smoke achieved legendary status quickly.

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He was quirky, with a bent tail and scarred ears and a funny saunter to his walk. He had a way of targeting people in a particular state of strife – jumping onto the lap of a woman fearing a miscarriage or a newly widowed elder. Truth be told, Smoke also had a way of targeting the folks who were allergic to cats, jumping up on their laps, too. It wasn't uncommon in a class or meeting for Smoke to walk from one lap to another, or to weave around chair legs and ankles, absorbing a gentle pat from one person after another.



Smoke's first time in the worship was for a funeral of an elder who had died after years of dementia. The elder had been a real cat-lover in life, Smoke came in during the funeral and settled in front of the table where the ashes had been placed, to the delight of the family and friends who had gathered.



There were expenses, of course, vet bills and food and litter box provisions. It didn't take long to realize that these should be charged to the hospitality line of the operating budget. Smoke was the church's greeter. Pull up in the parking lot, and he would appear from somewhere under the church or nearby bush and come walking out to the car. Kids who were new to the community describe how Smoke was the first to make them feel

welcomed and understood. When given an opportunity to name their church school class, the middle schoolers of the congregation went with Smoke's Rangers.

As for the mice... Smoke was often seen at his post, back to the church, facing the nearby grasses, daring any mouse to come near. And yes, there were sometimes Sunday morning offerings left at the doorstep. Very effective he was. Smoke died this spring; a loss to our

church community. We held a burial on the church grounds, near the grasses where Smoke had previously stared down the mice. We were grateful for the Episcopal Church’s [Service at the Loss of a Beloved Animal](#). Prayers were prayed, stories were told, there was laughter and sorrow. One of God’s creatures had passed from our midst.

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EXHIBIT “14”

From: Dan McClain dan@stpauls-dayton.org
Subject: COVID letter to parish - let me know what you think
Date: September 11, 2020 at 1:15 PM
To: Aimee Hill aimee@stpauls-dayton.org



Dear Friends in Christ,

I'm writing this afternoon to address concerns and confusion about how we as a local parish are handling the complications and difficulties around the COVID-19 pandemic.

I want to assure you that *St Paul's is committed to following Diocesan and statewide guidelines* to safeguard the health of our community, including restricting our indoor services, maintaining social-distance, upholding the statewide mask usage policy, and ensuring that our buildings are sanitized. The safety of those in our buildings and in our community, such as the children of our pre-school, is of the utmost importance.

In March, the ministry team at St. Paul's began to live-stream our Sunday morning service. We will continue to do so for some time as the needs of our community will require undoubtedly a live-streamed service for those of us that are immune-compromised. Members of our vestry are underway now evaluating new live-stream technology to improve that offering.

Additionally, I'm happy to share that the ministry team and I are working to publicize a schedule of outdoor services to begin in the next couple weeks. Please stay tuned for that announcement.

This pandemic has changed all our lives dramatically, some more than others. Rather than stopping the ministry of the Church, however, it heightens the need for our ministry to the vulnerable, the sick, and the oppressed. It's not yet clear what that ministry might look like or where we might find the greatest need. But it certainly begins in our very midst. Let's care for each other in compassion and charity.

Yours faithfully,
Dan

EXHIBIT “15”

From: Daniel McClain <danielmcclain@gmail.com>
Sent: Thursday, February 1, 2024 5:33 PM
To: Deborah R. Stambaugh; Lynn Carter Edmands
Subject: Fwd: Advent Resources
Attachments: DoNotBeAfraid_Devotional.pdf

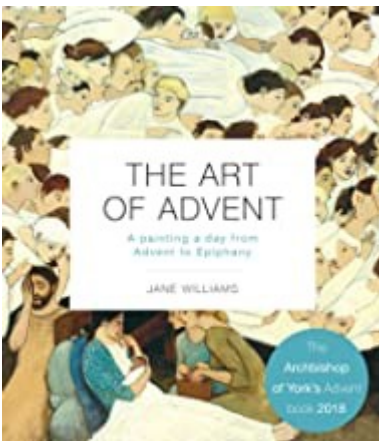
Begin forwarded message:

From: Kate McClain <kate@stpauls-dayton.org>
Subject: Advent Resources
Date: November 14, 2020 at 9:56:41 AM EST
To: Kate McClain <kate@stpauls-dayton.org>

Dear Parents,

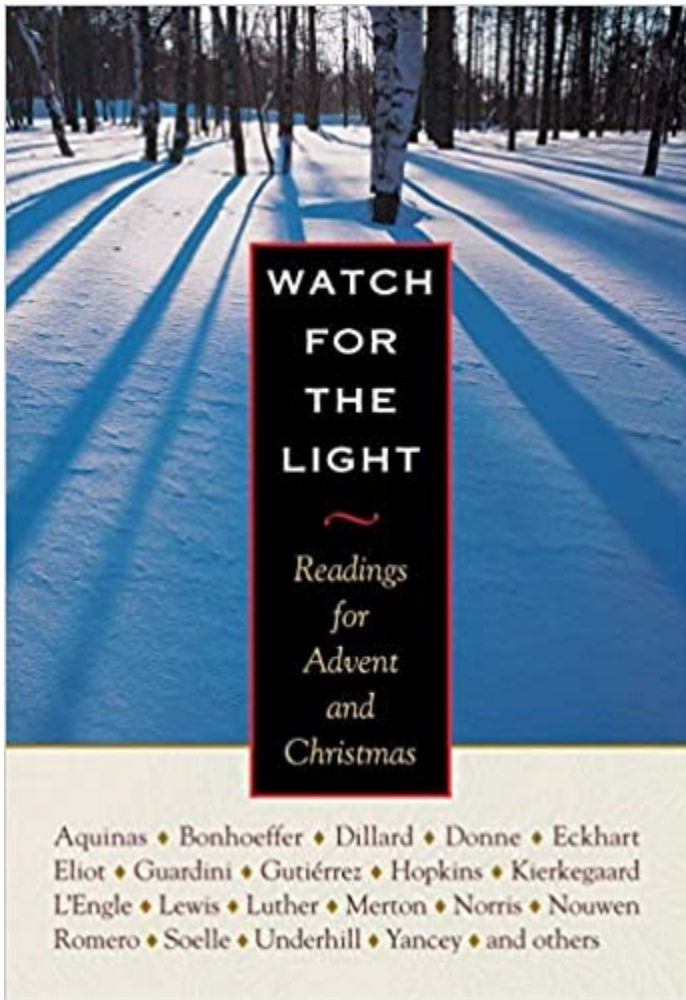
First, I want to tell you how happy I am to be working at St. Paul's as Assistant Director of Children's Formation! Second, I am writing today to share some of my favorite Advent resources. I am always on the lookout for special and intentional ways to celebrate and observe the church year with children. There are so many resources out there to choose from that it can be overwhelming - especially at a time of year when we are making so many other decisions and preparations for the holidays! These are the ones we have enjoyed and cherish the most.

Books for adults



[The Art of Advent by Jane Williams](#)

There is a discussion of each painting, with reflection questions at the end. Could be fun to work through with a partner, spouse, or friend!



[Watch for the Light: Readings for Advent and Christmas](#)

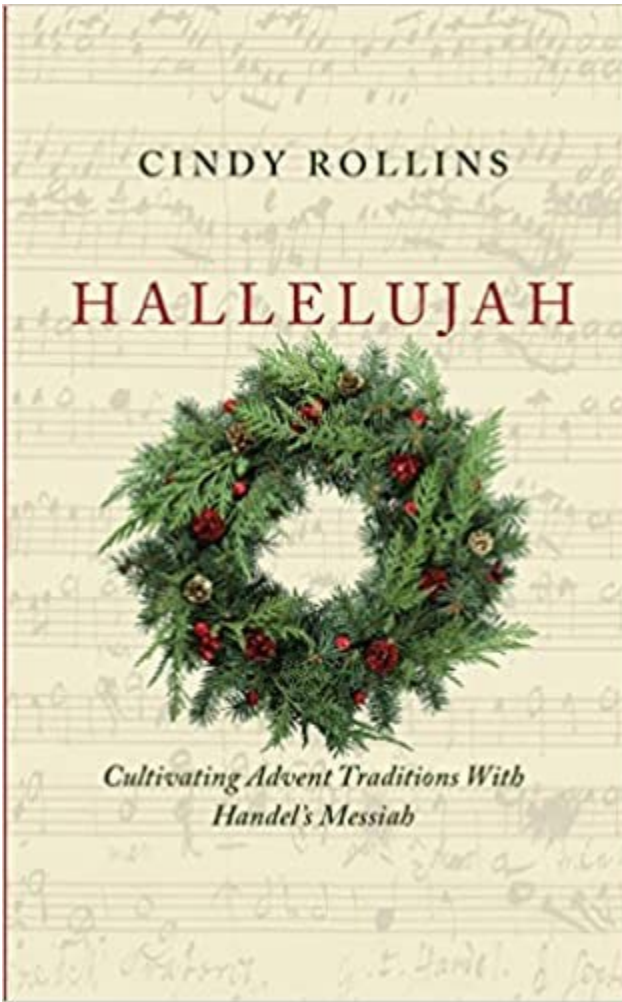
Beautiful and thought provoking readings for each day from Nov 24 - Jan 7

Resources for families:

1. Dan found this one and we are doing it as a family for the first time this year:

[Prepare Ye the Way of the Lord - nightly service for a 7-week Advent](#)

2. [Hallelujah: Celebrating Advent Traditions with Handel's Messiah](#)

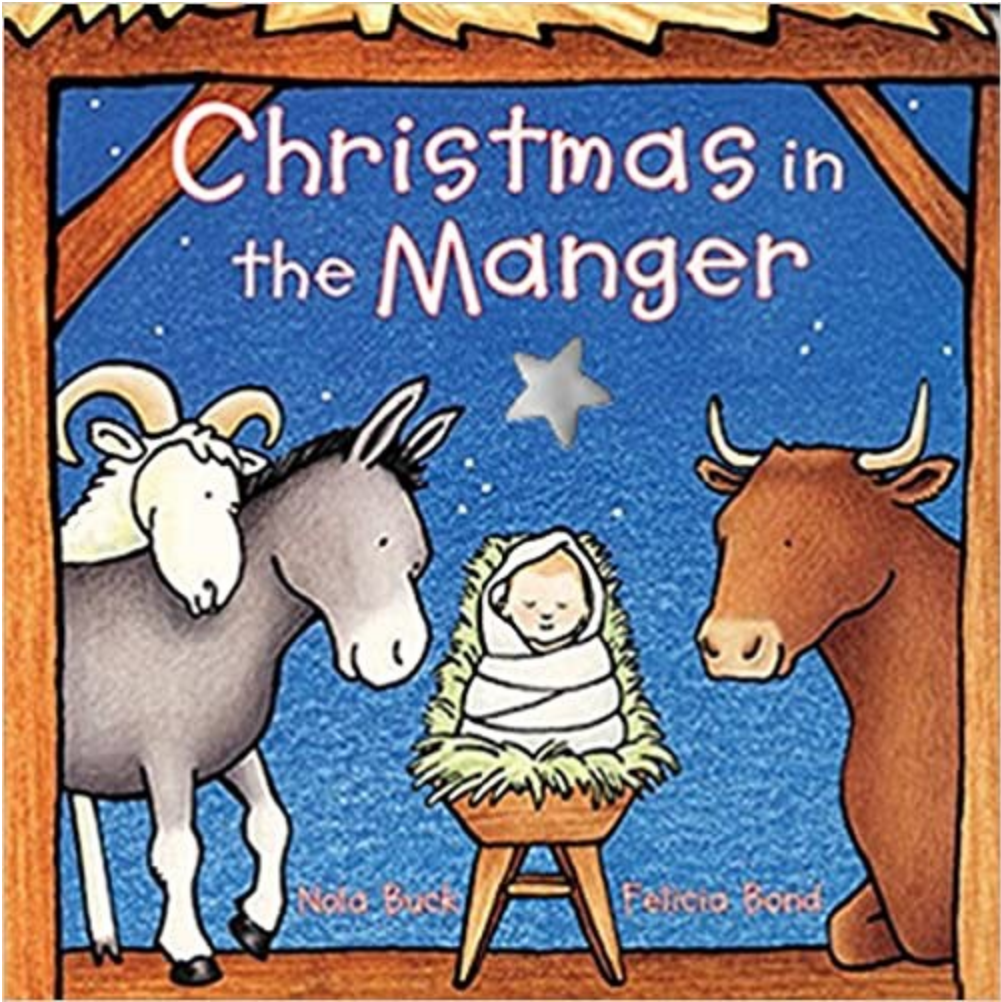


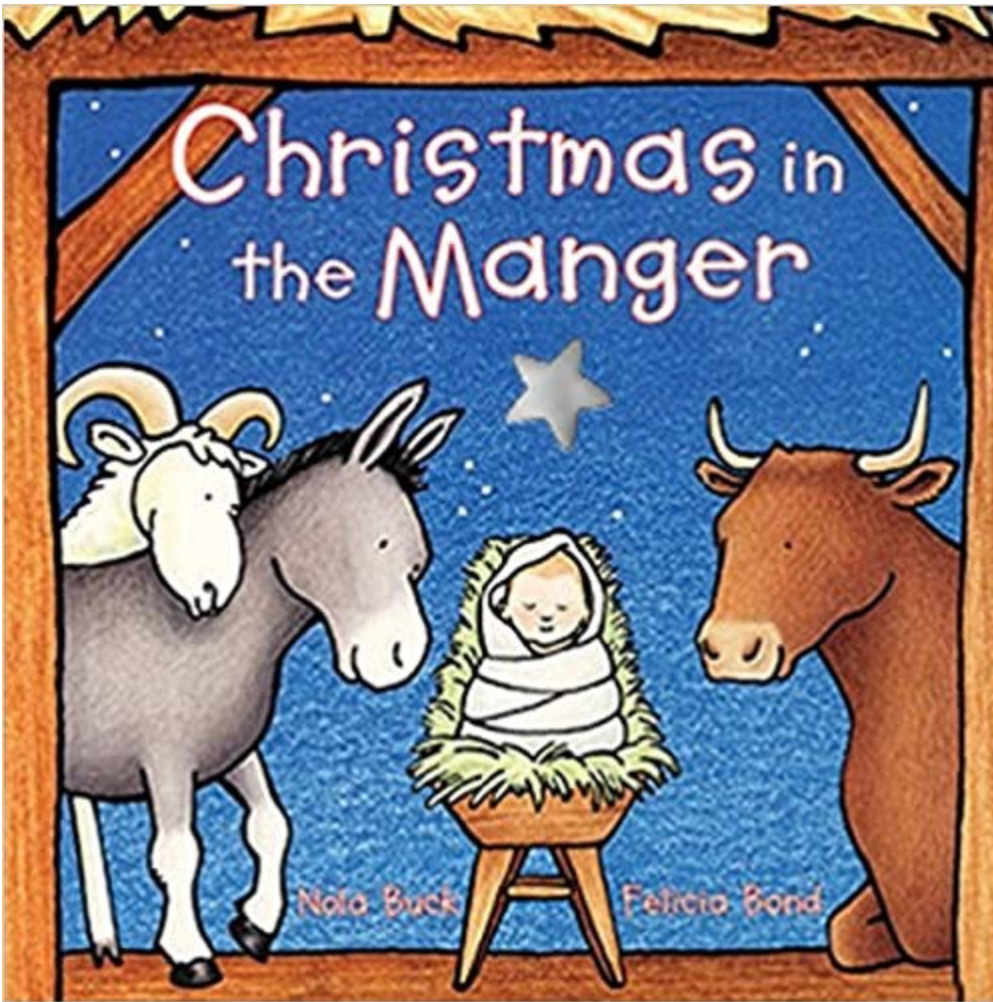
3. [Keeping Advent by Kortney Garrison](#)

Keeping Advent is my favorite advent resource. One thing Kortney talks about in the ebook that we do each year is [Jesse Tree coloring](#). She has a lovely blog post about it [here](#), as well as several other posts about preparing for and observing Advent (including this one on [Margin and Rest](#)).

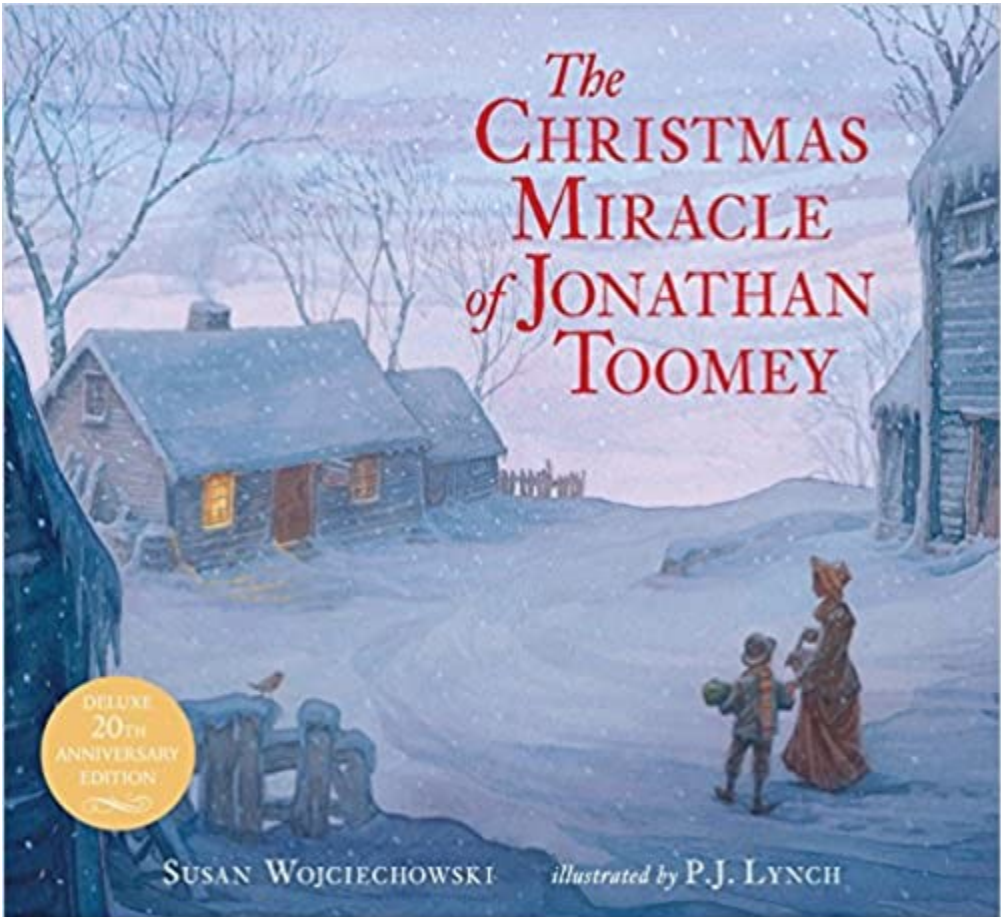
4. Do Not be Afraid: An Illustrated Devotional (Attached below - this one is geared toward older kids & teenagers...Aimee found it & we are excited to try it out with our older 2!)

Picture books:





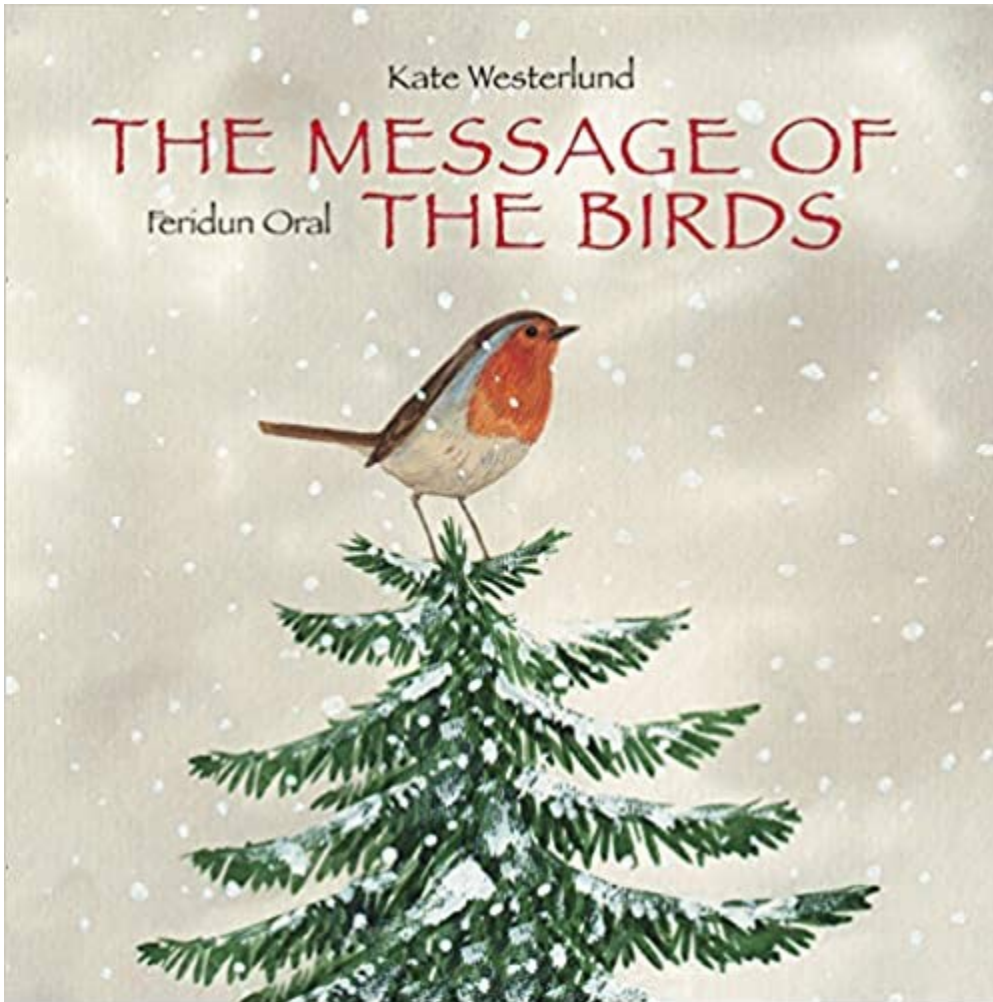
[Christmas in the Manger](#)



[The Christmas Miracle of Jonathan Toomey](#)



[Song of the Stars](#)

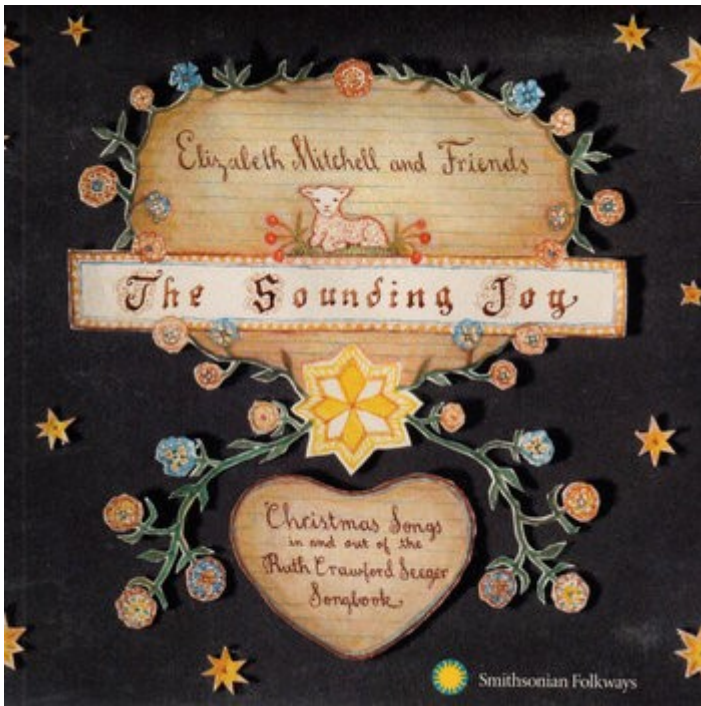


[The Message of the Birds](#)

Music:

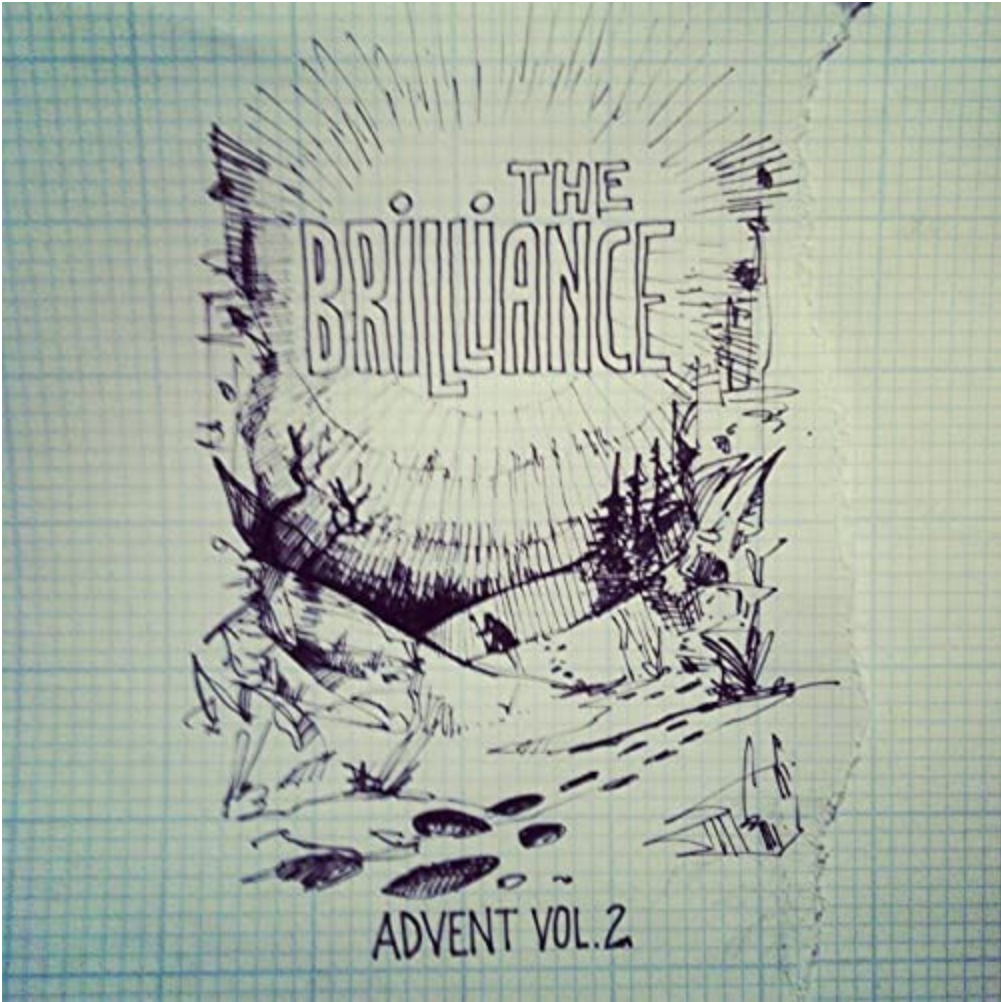


[Advent with Sacred Ordinary Days Playlist](#)

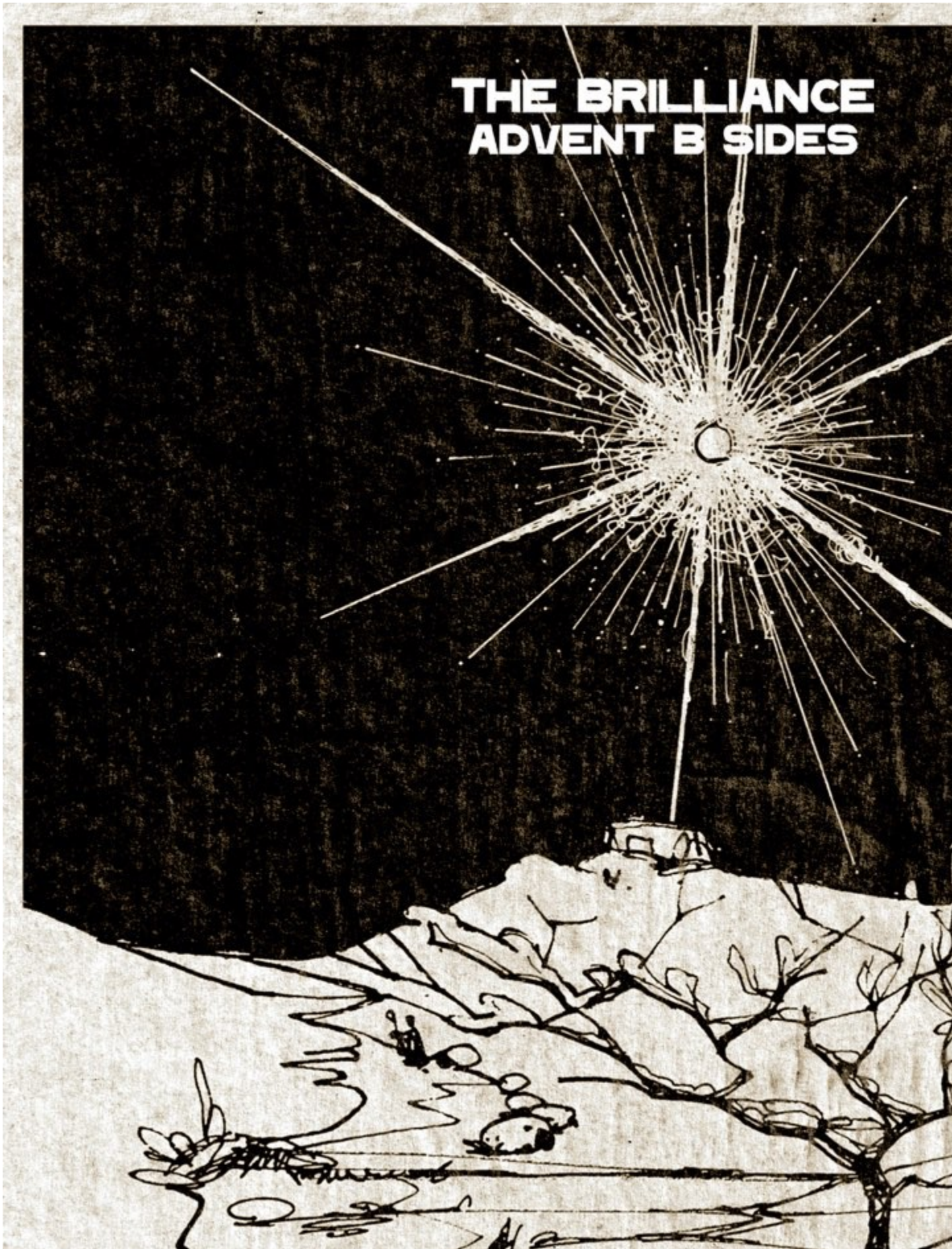


[The Sounding Joy](#)



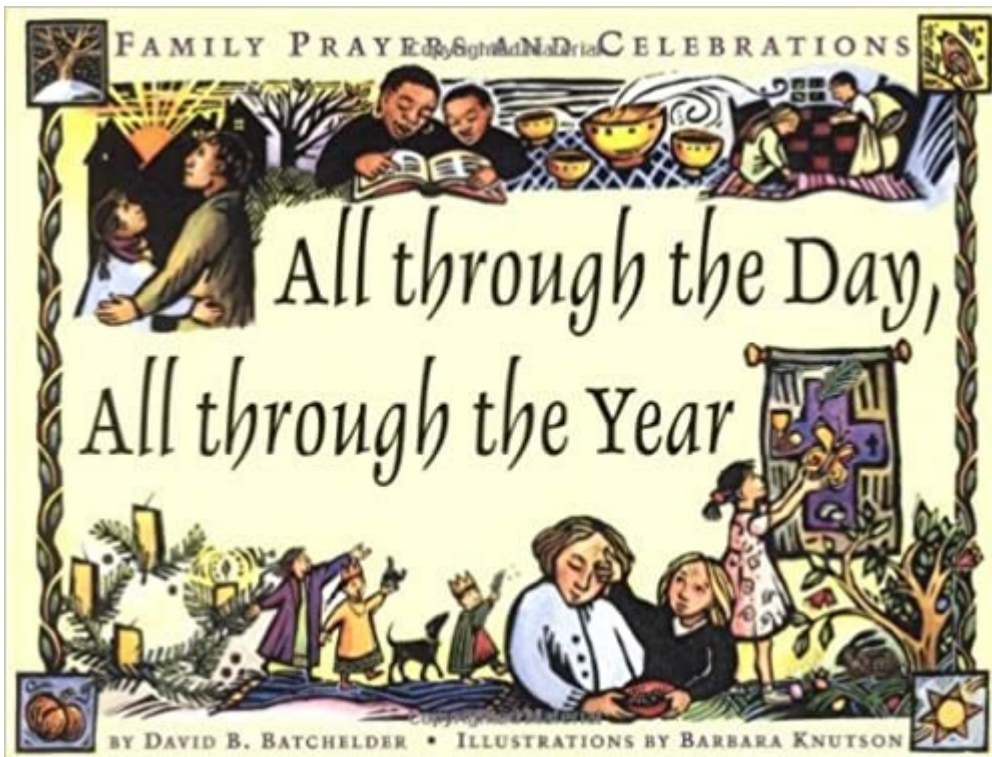


**THE BRILLIANCE
ADVENT B SIDES**



The Brilliance has 3 Advent albums and they are all wonderful!

One last resource to share - I've been using it since 2011 and it's a wonderful liturgical resource for families for the whole year:



[All through the day, all through the year](#)

I hope this list is helpful. If you have questions or would like to talk more about any of this, please let me know!

Best,
Kate