

EXHIBIT “1”

Kate Furmanski
358 Beverly Place
Oakwood, OH 45419

September 25, 2025

Deborah R. Stambaugh
45 Liberty Blvd., Suite 230
Malvern, PA 19355

Dear Ms. Stambaugh,

Regarding the issues between the Diocese of Southern Ohio and Dan McClain, I would like to state for the record that **I was never contacted by the diocesan attorney or investigator during their investigation of Dan McClain.**

I was a very active parishioner at St. Paul's from November 2021 through April 2024. Not only did I attend regular church services almost every Sunday, I also served on the altar guild and as a lay eucharistic minister, led evening prayer, planned and ran youth activities including a weekend service retreat, organized and cooked for social events, and even represented the congregation as a voting delegate at the election of Bishop White in September 2023. Because of all this involvement, I was well connected in the congregation. If anyone from the diocese was looking for a witness who could have told them what was happening on the ground at St. Paul's in 2022-2024, I would have been an excellent candidate.

I intentionally made myself available to the diocese for this purpose. Starting in July 2022 and continuing through February 2024, I sent at least three letters to first Bishop Smith and later Bishop White, both through our vestry and directly to the publicly available email addresses of the bishops and other diocesan staff members. In these letters, **I repeatedly begged the bishops and diocesan staff to reach out to me and to other people who were attending St. Paul's in person at that time.** I repeatedly expressed a desire for contact and connection that would promote healing and a restoration of mutual trust. I invited them to come and worship with us to witness what was truly happening at St. Paul's on a typical Sunday, namely, meaningful worship and community building. Over this year and a half of repeated invitations to communicate, **I never received a single reply** or was contacted at all by anyone from the diocese for any purpose with the exception of their monthly email newsletter.

Instead, **in February 2024 the diocese released a Written Statement to my congregation and the local media that characterized St. Paul's parishioners at that time as irrational and in thrall to Dan McClain, without ever making a good faith attempt to interview us and understand our thinking.** The Written Statement paints the regular attendees at St. Paul's at that time as a uniform, brainwashed cult, hanging on Dan McClain's every word rather than thinking for themselves. **This was offensive in the extreme,** to me personally and to the dozens of other Christians with whom we worshipped and served every week. I was never in thrall to anyone, and I utterly reject that I was manipulated by Dan McClain into supporting his ministry. **I never feared him, I never loved him, I was never in awe of him.** I reject in the strongest

possible terms that I and my fellow parishioners attended and worshipped with anything less than our full agency and free intellect. This was a shockingly disrespectful way for the diocesan leaders and attorneys to speak of their brothers and sisters in Christ, especially as **the diocese consistently refused to speak to us and instead only spoke about us** dismissively and over our heads, as if we were incapable of talking with the grown-ups. To insult your own church family like this in private communication would be bad enough, but to do it in a public document that was released to the media was a betrayal.

I would like to highlight one aspect of the diocese's lack of contact that has caused me particular frustration. One of the accusations against Dan McClain in the Written Statement was that "in the course of the domestic dispute between [Dan McClain] and [Kate] McClain he has spoken to people in the parish about the dispute and attempted to turn them against her. It appears that he may also have confided to them information relating to alleged medical issues on the part of Ms. McClain. According to Ms. McClain, one specific member of the parish, who is a strong supporter of Respondent, called her while she and Respondent were in reconciliation talks to suggest that, if she were to return to St. Paul's, she should write a letter to the church explaining her mental condition and what treatment she is receiving." I was that member of the parish, and I would like to state again, as I have maintained ever since learning about this accusation, that Dan McClain did not share confidential medical information about her with me. Any conclusions that I reached about Kate McClain's mental state were based on my own in-person interactions with her throughout 2022. Although the diocese had my home address, phone number, and email address, and Kate McClain obviously had my phone number as well, **no investigator and no one from the diocese ever contacted me to verify whether Dan McClain had revealed confidential medical information to me**, either before or after the church attorney wrote this complaint and released it to the public, and no one has ever asked me why I said what I said.

By way of a more detailed explanation (feel free to skip this paragraph if you're not curious), the phone call mentioned in the Written Statement occurred about six months after Kate McClain had accused Dan McClain of domestic abuse, throwing the congregation into anguish over the possibility of abuse and tearing the congregation apart, as many families simply left the church for good as soon as the accusation was made public. Kate McClain and her three younger children had then been absent from St. Paul's for the intervening six months, but at the time of the phone call, she was telling me that she had been mistaken about the abuse, i.e., that it had never happened, and that she was planning to both reconcile with Dan McClain and return to St. Paul's as a regular attendee within the next few weeks. She and I had talked about both of these plans briefly in person a few days before, and after thinking about it I had decided that a good friend would try to prepare her for the frosty reception she was likely to encounter at St. Paul's and offer advice with the goal of fostering reconciliation between her and the congregation. Based on her enthusiasm about returning to St. Paul's and her expressed expectation that everything would then go back to normal, I deduced that she was not fully aware of the turmoil and misery that her accusations had caused, nor of the difficult feelings that many in the congregation felt toward her as a result of the accusations, which, at the time of the phone call, Kate McClain was saying had been false. That day, when we were on the phone arranging a time for our sons to get together, she brought up her planned return to St. Paul's, and I took my chance. Starting by saying that I knew this would be a hard thing to hear, but that I meant it for her good and the good of her family, I mentioned the possibility that mental health struggles might have been involved in her first accusing Dan McClain, then withdrawing the accusations, and suggested that acknowledging her struggles and stating that she was taking steps to

address them might be the best way to achieve full reconciliation with the congregation. I have heard that, in many cases, when a health issue such as addiction or mental illness has caused someone to harm friends and family, the friends and family have trouble trusting that person again unless they know that person is taking steps to reduce the likelihood that the harm will happen again, such as by going to addiction rehab or seeking counseling. I could see that Kate McClain was planning to return to St. Paul's unannounced and cheerfully attempt to rejoin the congregation as if nothing had happened, which did not seem like a good plan for rebuilding community trust or ensuring a positive experience of welcome for the McClain children. I believed that, if she were able to recognize that her actions (which she was then characterizing as mistakes) had harmed people, and to express a desire and intention to prevent future harm, she and her children would be embraced more openly and fully. This was my motivation. I probably did not do a perfect job of expressing this over the phone, but Kate McClain did not seem upset at the time; she simply said that I had given her a lot to think about, and we said goodbye. Kate McClain ended up not returning to St. Paul's and not reconciling with Dan McClain, and I never heard anything about this conversation again until I received the February 2024 Written Statement from the diocese in which my phone call was misrepresented as evidence that Dan McClain had done wrong. No investigator ever contacted me to talk about what I said to Kate McClain or to ask how I had reached my conclusions about Kate McClain's mental health or about what might be helpful for her in attempting to reconcile with the congregation.

I would like to close by underscoring that I'm not writing this letter because I'm devoted to Dan McClain personally. **I'm not close friends with Dan McClain, but more like acquaintances whose children are friends.** Because our teenage sons, who met at St. Paul's, remain close to this day and are all in the same Boy Scout troop and on the same mountain biking team, I have seen and conversed with Dan McClain, to the best of my knowledge, four times in 2025, but I have also seen and conversed with his ex-wife Kate McClain three times in 2025 for the same reasons: arranging pick-ups and drop-offs so that our children can get together, and attending the children's extracurricular activities.

I will readily admit that **Dan McClain was not a perfect priest** and that he made mistakes in his ministry that impacted his congregation. I'm even kind of irritated with him about some of those mistakes and wish he would have done some things differently. But perfection is not why I chose St. Paul's or why I chose to stay deeply involved in the life of the congregation before, during, and after Dan McClain's time there. My connection to the Episcopal Church went a lot deeper than an attachment to any one person.

I hope you find this statement useful.

Sincerely,

Kate Furmanski

From: Walters, Laura (walterlt) <walterlt@mail.uc.edu>
Sent: Friday, September 26, 2025 12:34 PM
To: dstambaugh@wispearl.com
Subject: Fr. Daniel McClain Letter of Support
Attachments: 2025 Fr. Dan Letter of Support.pdf; 2024 Letter to the Title IV Hearing Panel.pdf; 2022 Letter To The Church In Oakwood.pdf

Dear Ms. Stambaugh,

I was not contacted by the diocesan attorney or investigator in their investigation of Fr. Dan, but I wanted to write a letter of support as I have done in the past. I have written to both the Title IV Hearing panel and the St. Paul's vestry over the past few years in support of Fr. Dan, so I have attached those letters to this email as well to provide additional context and resources.

Thank you for taking the time to read and consider what I have to say.

Best wishes,
Laura Walters

Ms. Laura Walters
474 Lookout Ridge
Oakwood, Ohio 45419

September 26, 2025

Dear Ms. Stambaugh,

I was not contacted by the diocesan attorney or investigator in their investigation of Fr. Dan. But I wanted to write a letter of support as I have in the past and will continue to do so until Fr. Dan and his family are allowed to move forward with their lives and heal.

My name is Laura Walters. I have attended St. Paul's my entire life and served the church as a choir member, lector, acolyte, and formation leader for many of those years. I am writing in support of Fr. Dan because I believe he was by far the best priest we ever had and the one who made the most positive impact in my own personal faith and journey as a follower of Jesus.

Until Fr. Dan arrived at St. Paul's, not one person, clergy or congregant, ever reached out and invited me to get coffee and chat. But he did this with everyone in the congregation as soon as he started working at our church. He wanted to get to know his brothers and sisters in Christ and find out how he could serve them and how together we could serve others and the mission of the Church.

Fr. Dan breathed new life into our congregation. He brought in new members who did more than just come to service on Sunday. He attracted Christ-like individuals who wanted to grow in their faith and then go out into the world and share it. He led book studies that helped educate us and develop our faith, as well as build strong bonds between the members of our congregation.

In 2023-2024, I helped Fr. Dan lead a formation program, in which I worked closely with him and got to see how he interacted with a larger cross-section of our congregation. He was kind and thoughtful and listened closely to what each individual shared. He imparted advice and even brought his own struggles to the group as a fellow brother in Christ. He was open and affirming with everyone every time we met. And everyone I spoke to after that formation group ended, said that it was deeply meaningful to them. We all felt that program fostered stronger bonds between us as a congregation and helped us grow in our faith.

But Fr. Dan's openness wasn't limited just to that formation group, he was like that every Sunday and in everything I saw him do at St. Paul's. He wanted to build real bonds with everyone in the congregation and with the wider community. He wanted everyone to pitch in and grow together. Both old and new members could see and feel the Spirit waking within each other and within the St. Paul's community. We were all eager to see what happened next, but unfortunately we weren't able to see how Fr. Dan could help us grow even more.

Fr. Dan also brought back members who had left St. Paul's years ago, including one faithful individual who was cast out by fellow parishioners who deemed him unworthy to be a part of the church following his divorce. If Fr. Dan failed to foster healthy relationships with certain members of the congregation, I'd suspect it was with those who fed the deeply un-Christian culture that led so many members to leave in the first place. The same individuals who created the unwelcoming environment that I knew growing up at St. Paul's. Who among us could possibly foster healthy relationships with people who act like that? They resist love and openness and forgiveness. They also run away from doing any of the real work of being the Church.

When the arguments about Fr. Dan first became public, inactive members who hadn't shown their faces at St. Paul's in years (other than to talk about money and voice their complaints at the annual meeting) started coming out of the woodwork. They showed up at church business meetings and started communicating with the Diocese and the local media to voice their disapproval of Fr. Dan, but there was one key place where they were absent: in the pews.

You couldn't find these naysayers on Sunday morning, or participating in any group activities, or taking part in any formation or volunteer opportunities. And unsurprisingly, those same people have still never returned to St. Paul's, even after we severed ties with Fr. Dan. Why then do their opinions matter more than those of us who are there every week worshipping, breaking bread, communing together, and giving thanks to God as a unified body?

In addition to dealing with the toxic subset within our congregation, Fr. Dan also came to St. Paul's right before the pandemic and had to deal with all the uncertainty, fear, and confusion of that incredibly difficult time as well. I think trying to lead our already divisive congregation remotely made his job even harder and made certain people's opinions of him even worse.

Fr. Dan once confided in me that he was getting complaints from both sides of the great pandemic divide: some complained he was too strict with Covid procedures and some said he was too lax. We can all recall how chaotic and stressful those early days of the pandemic were and how heated and even violent arguments became across the country over mask protocol, vaccinations, and social distancing. Now put a new young priest trying to lead an aging and opinionated congregation into that setting. There were bound to be some people who were upset with Fr. Dan no matter what did.

Despite it all, I never witnessed Fr. Dan do anything other than support, listen, counsel, and love everyone at St. Paul's, even when the rumblings of discontent about him began. What I saw was a good man trying to do his best for the members of his congregation. He put in more effort to build strong, positive relationships and grow our church than any of the leaders I've seen come and go at St. Paul's—and there have been a lot of them.

Which leads to the question: Why has St. Paul's rejected so many of its priests over the years? There's one common factor and it isn't Fr. Dan. He did more for the mission of St. Paul's and the

mission of the universal Church than any of our previous priests and was punished relentlessly for his efforts. He had so much working against him and yet he always tried to do what was right for our congregation and the future of St. Paul's and the Church.

Since Fr. Dan came to St. Paul's, I have become much more involved in church. I sing in the choir every week, have attended and led formation groups, been a delegate at the diocesan convention, and built many new friendships with fellow members. All of that is because Fr. Dan reached out and asked if I wanted to get a cup of coffee. That set it all in motion for me. It was the invitation I'd been waiting for my whole life at St. Paul's. None of our other priests ever made even that small effort to reach out and connect and try to build a relationship, but Fr. Dan did. And he did it with everyone, not just me. It's those tiny acts of kindness that can totally change someone's life. They are what keep the Church going and making new disciples.

I have grown so much in my relationship with God because of Fr. Dan, even with all the heartbreaking drama of the Title IV process and its fallout. In all honesty, I think the terrible trauma that Fr. Dan and our congregation has had to endure has made me grow the most. It has pushed me to question what God is doing in our individual lives, at St. Paul's, in the Episcopal church, and in all creation. It has made me stand up and speak out, like I'm doing now, against the evil I see creeping into the Church in order to defend a brother in Christ. It has made me lean on Jesus and take His yoke upon me and learn from Him.

I hope Fr. Dan has been able to find some of that same solace and rest in God's love throughout this extremely trying period. And I pray that someday soon he and his family are free of this sad situation and finally allowed to heal.

Thank you for your time. May God's peace be with you.

Sincerely,
Laura Walters

From: Linda Bumiller <lbumiller@yahoo.com>
Sent: Thursday, September 25, 2025 6:44 PM
To: dstambaugh@wispearl.com
Subject: Rev. Daniel Wade McClain

Dear Ms. Stambaugh,

I am writing today in support of Rev. Daniel Wade McClain in regard to a Title IV case. I was not contacted by the diocesan attorney or investigator in their investigation of Fr. Dan. I sent a letter to the following individuals on February 29, 2024 and received no reply.

The RR Bishop Kristin Uffleman White, The Rev Canon Michael Spencer, The Rev Canon John Johannsen, The RR Nedi Rivera, Amy Howton, Dr. Stephen Pugh, The Rev Canon Brian Reid

In my letter I requested the opportunity to express my opinion as a congregant and member of the vestry. I was not contacted. I am writing today to provide support for Fr. Dan.

I first met Father Dan at St. Paul's while arranging a funeral for my father-in-law who had been an associate rector at St. Paul's in years past. I was attending church elsewhere at the time. Fr. Dan took the time to get to know my family and that relationship led me to see what worship at St. Paul's was like. Soon, my daughter, son-in-law and grandson were attending with me.

Fr. Dan was enthusiastic in providing many opportunities for spiritual development. After decades of relative stagnation St. Paul's began to grow. Dan's sincerity made visitors feel welcome. His sermons were thought provoking and actionable. He helped the congregation grow in Christ by sharing and working together. He led formation classes on the history of the Episcopal church and many fascinating topics. He led bible studies and book clubs. Dan celebrated trick-of-treat on the steps of St. Paul's with neighborhood kids on Halloween. As a congregation we opened our doors for a community Anglican Christmas celebration and a Celtic spring festival. He spoke at the high school. He created a youth group that went on a mission trip. Dan organized morning prayer several days a week and a very special evening prayer service on Sundays. The congregation broke bread together at festive gatherings. Dan found a way to meet the needs of the community and engage the congregation. St. Paul's was growing!

My experience at St. Paul's while Fr. Dan was there (the worship, education and fellowship) led me to decide to be received into the Episcopal church on May 12, 2024.

I was elected to the vestry and the finance committee. We worked well together and were excited about future opportunities. The false accusations regarding Fr. Dan were heartbreaking. There was no financial misconduct during my tenure. When the first Title IV case was dropped, Fr. Dan was voted in as Rector and we were ecstatic!

Rev. Daniel Wade McClain excelled in his role as rector. During Fr. Dan's time at St. Paul's the congregation was open, growing, kind and flourishing and the community was being served.

Respectfully,

Linda Bumiller

From: Ron Brown-Gray <ronbrowngray@gmail.com>
Sent: Wednesday, September 24, 2025 11:57 AM
To: Deborah R. Stambaugh <dstambaugh@wispearl.com>
Subject: Letter in support of Father Dan McClain

September 24, 2025

To Whom This May Concern:

Ron and Dave Brown-Gray begin this letter with the following statement: at no time in the past two plus years have we ever been contacted by the Diocese of Southern Ohio or its representatives in response to accusations made pursuant to the Title IV charges brought against The Reverend Dr. Daniel McClain.

After many years in the northern suburbs of Cincinnati, we transitioned to the Dayton area in 2017. Long travel time on Sundays to All Saints Episcopal Church became an issue for us. We began to search for a closer community as we began to build a life at our home in Kettering, OH. We made visits to several churches in the area. The one that stood out the most was only a few minutes from home. Father Dan was a gregarious guy who met us for coffee and conversation. We gave him a resumé of our experience at All Saints and we had a great hour-long conversation which included voicing our desire to become Vergers. He told us, “St. Paul’s might need you more than you need St. Paul’s.” We made a commitment in 2020, and our learning continued with Father Dan as our priest and mentor. He trained along with us to learn how we would be Vergers.

Our first knowledge of anything related to Title IV came at the peak of the pandemic in 2022. Without warning, Father Dan was put on an administrative leave. We heard a lot of rumors. We had a lot of questions. Folks were leaving St. Paul’s without explanation. As volunteer staff, we carried on with our duties as Vergers and lay leaders. During that time, folks from the Diocese were available to provide avenues for reconciliation and healing. That never happened. We were not sure why we would have needed that opportunity as there were no explanations as to why we needed it. A few months later, the administrative leave was lifted and Father Dan returned to the parish. No questions asked, no answers given. It was business as usual.

Anger is a destructive emotion. It's pervasive and it became apparent in the life of the parish. We started to research what exactly the Title IV process was and what it contained. We spent a lot of time googling the information. We became familiar with a website called Anglican Watch. Father Dan advised us not to give them credence or go to their website. He was up front with us about the level of biased reporting projected by their website. Of course, we had to check it out. It's not important, but in our opinion, Anglican Watch is nothing but a gossip rag, a blog run by an angry former priest (at least that's how we understand it from reading his piece on why he formed Anglican Watch).

The second time Title IV was implemented was in January 2024 and Father Dan was again placed on an administrative leave. Unfortunately, the effects of Title IV on the parishioners of St. Paul's started to surface. We carried on as usual but with more confusion, anger, sadness, disappointment and frustration. At this stage, it had all progressed to the point that we began to question the validity and integrity of the Title IV process and how it affects individuals and congregations, especially St. Paul's. **On the parish level, our perception is that it has done nothing but cause emotional destruction and division. It has affected us personally, as we were mentioned in the Title IV complaint by Anglican Watch. Again, no one from the Diocese has ever contacted or spoken to us regarding our response to confirm or deny the accusations in the complaint.**

Over the four years we attended St. Paul's, Father Dan was tasked with uniting a badly divided congregation. Indecision by the Vestry, undefined and unclear job descriptions, one-sided communications, unresolved conflicts, mistrust in leadership, and lack of discipleship created a firestorm we didn't see when we first started attending the church. The Vestry, essentially, is the Human Resources department. It seemed there was little initiative to guide Father Dan in the decisions he made. No one on Vestry seemed to say, "this is the procedure we need to follow." To our knowledge, there was miscommunication by all parties not recognizing where the parameters should have been drawn and appropriate guidelines given.

Unfortunately, there were folks in the community who would never accept Dave and me regardless of what we did to educate folks about the job of a Verger. Dan asked us to present a workshop on how we would fit in the community as Vergers and the contributions we could offer. But there were still those who wouldn't accept the change. The accusations made by Anglican Watch which were published on the website of the Diocese of Southern Ohio via the Title IV complaint were that we "were hired" to "*decide how to run the worship*" at St. Paul's.

"At about the same time, Respondent hired two people to be vergers at St. Paul's. This was allegedly done without approval of the vestry or notice to or input from the worship committee. This was a position not previously known at St. Paul's, and the two new staff members apparently made it clear at a meeting of the worship committee that they would decide how to run worship. It is alleged that a number of long-time worship service volunteers were put off by the vergers and their attitudes and have since resigned their positions."

At no time did we ever say we would decide how to run worship. We were not paid staff. We volunteered all of our services.

The other accusation was that we assisted in an exorcism. *“There is also evidence that Respondent, assisted by the vergers he hired, performed an exorcism of the St. Paul’s church building in 2023. Respondent acknowledges this but asserts that it was part of a building cleansing and blessing service and that no consent from the Bishop was necessary because the exorcism was being conducted on a building and not on people.”*

The incident in question was “offering prayers” for the Holy Spirit to be present in our place of worship. Calling that exorcism isn’t the terminology we would use. It was only prayer. The last time we checked, asking God to send the Holy Spirit to do [whatever] is a prayer that can be spoken by anyone as they feel the need to do so.

Change isn’t always easy, but if the community isn’t behind the change, then the community will falter. We witnessed it firsthand. We kept assuring each other to hold on and change would happen. Unfortunately, we couldn’t hold on any longer as the emotional and spiritual warfare took a toll on us and we left St. Paul’s. **The last one and one-half years have been difficult as we realized we are churchless.** We have looked for a community where we could once again practice our faith and our chosen ministry. At this time, we’re not finding it and we have to be okay with the loss for the present moment. The way we worship has changed, but our faith and trust in God will never falter.

With the Holy Trinity as our Guide,

Ron and Dave Brown-Gray

**Diocese of Southern Ohio
Disciplinary Hearing Panel**

Dear fellow members of the Episcopal Church,

Neither my wife nor I were contacted by the Diocese in their investigation of Fr. Dan, IN RE: The Rev. Dr. Daniel Wade McClain, Case No. 2023-01 (the "Title IV Case").

This was very disappointing, as we could have provided you with lots of relevant information.

My wife and I got married at St. Paul's on October 14, 2023. Fr. Dan married us. Fr. Dan was kind, generous, and everything we could have asked for in a priest. To this day, I am proud that he was our priest for our marriage. He went above and beyond in anything I could have asked for in regard to pastoral care.

My wife and her family have been members of St. Paul's for her whole life. My wife and I literally lived a few houses down from Fr. Dan and his family at the time the Title IV case began. We interacted with them multiple times per week. We went to church nearly every Sunday while this whole sad episode was going on. We would have been willing to talk to anyone from the Diocese or its investigators. To this day, we do not know why no one ever talked to us.

We know Fr. Dan well, and about this situation. We hope and pray that you clear him of all these charges, and for Fr. Dan to return to St. Paul's. We would be front and center for his first Sunday back.



Elliott V. Haller



Anna E. Haller

Diocese of Southern Ohio

The Right Reverend Kristin Uffelman White

kwhite@diosohio.org

The Reverend Canon John Johannsen

jjohanssen@diosohio.org

The Right Reverend Bavi E. “Nedi” Rivera

nrivera@diosohio.org

Amy Howton

ahowton@diosohio.org

Dr. Spencer Pugh

spugh@preachingfoundation.org

Dear fellow members of the Episcopal Church,

My wife and I got married at St. Paul’s on October 14, 2023. She and her family have been members of St. Paul’s for her whole life. I am a lifelong Episcopalian and attended a different Episcopal church before relocating to Dayton, Ohio two years ago. I am writing to express my profound disappointment with the Diocese regarding its actions in IN RE: The Rev. Dr. Daniel Wade McClain, Case No. 2023-01 (the “Title IV Case”). The Diocese has damaged and caused immense pain to our church, our families, and our community.

It is my understanding that 28 people were interviewed concerning the Title IV Case. My wife and I, despite the fact we were recently married by Fr. McClain and literally live a few houses down from him, were not interviewed. Nor was anyone else we regularly talk to at church interviewed. My wife and I have never experienced any manipulative behavior from Fr. McClain or seen him act in a manner unbecoming a member of the clergy.

I have been a practicing attorney for over 10 years, and have represented both employees and employers in matters similar to the Title IV Case. I simply cannot understand the Diocese choosing to go forward with Title IV Case in such a way. That the Diocese chose to repeat verbatim and publish salacious gossip is outrageous. Even if the allegations in the Title IV Case were all true, this would not have been the way to proceed. The Diocese has embarrassed St. Paul’s in the eyes of our community and severely damaged St. Paul’s ability to grow, and perhaps, even to survive, as a church. Far worse though, is that you have humiliated and caused Fr. McClain’s children long lasting suffering. Fr. McClain’s children are entirely innocent. Does the Diocese realize the pain that it needlessly caused them by publishing the Title IV Case allegations? You may not be aware that one the children recently made the honor roll at Oakwood High

School. The day that wonderful news was published in Oakwood Register, was the same day the salacious allegations made against Fr. Dan made the front page of the Oakwood Register. He then had to go to school and hear his classmates talk behind his back. I cannot fathom the pain you have caused this nice young man. The Diocese's actions are unjustifiable. Worse than that, they are deeply, deeply un-Christian.

It saddens me to have to write this letter. As I am sure you are aware, the Episcopal Church has suffered a precipitous decline in membership and participation over recent years. As a (relatively) young member, I have often worried about the future of the Episcopal Church in general. St. Paul's in particular has struggled to maintain membership independently of the allegations made in the Title IV Case. The Diocese's actions have made this worse. My wife and I are worried we may be the last couple to be married at St. Paul's. We hope to have children in the future and worry about what kind of church will be there for them.

We should all be coming together as Christians to support our church. In the year prior to the Title IV Case, I have witnessed what I hoped was modest growth at St. Paul's. Now, we have a leaderless church, no communion, fewer people in the pews, the wider community gossiping about us, no doubt bleaker future finances ahead of us, and open discussions in church of people leaving the Episcopal Church. Is this what the Diocese wanted? Because this is all the direct result of the Diocese's handling of the Title IV case.

Elliott V. Haller
Anna E. Haller

25 September 2025

**Diocese of Southern Ohio
Disciplinary Hearing Panel**

Dear fellow members of the Episcopal Church

Neither of us were contacted by the Diocese in their investigation of Fr. Dan, IN RE: The Rev. Dr. Daniel Wade McClain, Case No. 2023-01 (the "Titel IV Case").

Our son Elliott V. Haller married Anna E. Alexander at St. Paul's on October 14, 2023. Fr. Dan married them, and they were very pleased with his kindness and support. He was also very welcoming and helpful to us as parents. We had just moved back to the Miami Valley in July 2023 and were attending our son's church -- and we dove right in to wedding plans and logistics at St. Paul's with Fr. Dan' to guide us.

Anna and her family had been members of St. Paul's for her entire life, and it had always been a part of her life. Seeing the way a "case" was brought against Fr. Dan and his exit was deeply shocking and upsetting to them and to us. Although we were relatively new at St. Paul's, we would have been willing to talk to anyone from the Diocese or its investigators. No one ever spoke to us (or to Elliott and Anna).

We had looked forward to services at St. Paul's as we continued our transition back to Ohio after living and retiring in the South (and we were members of Episcopal Churches there). After this terrible disruption at St. Paul's, we eventually began attending another Episcopal Church in the Miami Valley.

We hope that you clear Fr. Dan of all these highly questionable charges.



Stephen E. Haller



Susan C. Haller

From: Craig Boman <craig.boman@gmail.com>
Sent: Saturday, September 20, 2025 7:35 PM
To: Deborah R. Stambaugh <dstambaugh@wispearl.com>
Subject: Fr Dan McClain's investigation

Dear Ms Stambaugh,

I was not contacted by the diocesan attorney or the investigator in their investigation of Fr Dan. Please accept the following comments in support of Fr Dan. I had been attending St Paul's since the start of Fr Dan being installed as church rector. I have been through various churches, over the years; I have been Christian for most of my life, and attended numerous churches. St Paul's under the leadership of Fr Dan was the first church that I had felt called to attend. Under Fr Dan at St Paul's it was clear how extraordinary he was at connecting to the local community, to grow the church. I don't know anything about Fr Dan and his relationship to his wife, nor his overuse of incense, and to be honest, these shouldn't have any bearing on his interactions with the church, within reason.

Fr Dan was clearly a passionate church leader whose primary goal was connecting to the community, growing the church, and engaging current active and potential members. On Sundays, his sermons were engaging and his annual holiday festivities were a thing to remember. These growth opportunities were all cut short when he was removed as rector; I have since been without a church. The church itself has been fractured. And I have stopped my tithing to St Paul's. I have very little trust in St Paul's ability to continue to grow the church; it has since felt like a church that is stagnant and has few, if any, young families; the lifeblood of churches.

I will continue to seek a church with the vitality and local connection that was initiated during Fr Dan's tenure.

Best,
Craig Boman

To Whom It May Concern:

I was not contacted by the diocesan attorney or investigator in their investigation of Fr. Dan.

My name is Matthew Harrington, and I had the distinct pleasure of having Fr. Dan as my chaplain, mentor, and friend during my time at William & Mary.

During the two years that I spent with Fr. Dan, it was beyond evident that he cared deeply about those around him. He never sought praise, always welcomed criticism, and thoughtfully considered how he could help contribute to a community centered around Christ.

Fr. Dan helped me to better understand other's perspectives. In instances where I felt I was unable to do so, he encouraged me to love and accept them. He saw everyone as equals and treated them as such.

I witnessed Fr. Dan live out the words he spoke to me, and I continually strive to implement what I learned from him on a daily basis. He was a fundamental part of my development as Christian and I am so grateful for the opportunity to have spent time with him.

Sincerely,

Matthew Harrington

Diocese of Southern Ohio Disciplinary Hearing Panel

25 Sept, 2025

Dear Fellow Member of the Episcopal Church

I was not contacted by the Diocese in their investigation of Fr. Dan, in Re: The Rev. Dr. Daniel Wade McClain, Case No. 2023-01 (The "Title IV Case")

I have been a member of St. Paul's Oakwood since 1987. Fr. Dan preached the Gospel that Spoke to me better than anything I have heard since I was in San Antonio. He cared about his Parish members deeply. He asked me, since I am a physician, to come up with COVID 19 Protocols That would help St. Paul's. With the COVID 19 committee he implemented a Protocol that caused no deaths in our Parish due to COVID 19. His formation teachings were inspiring to me. He was bringing in more new members than anyone in the last 40 years.

I pray that you will clear him of any charges and allow him to return to St. Paul's as soon as possible

Sincerely,

Stanley L. Alexander, M.D.

From: Philip Buerk <philipbuerk727@gmail.com>
Sent: Thursday, September 25, 2025 6:14 PM
To: dstambaugh@wispearl.com
Subject: Father Daniel McClain

Dear Ms. Stambaugh,

I was not contacted by the diocesan attorney or investigator in their investigation of Fr. Dan.

As a seminarian, I paid particular attention to how clergy navigate relationships in the parish. What I witnessed in Fr. Dan was a consistent commitment to equity. He took care to ensure that no voice dominated and that those who might otherwise be overlooked had space to be heard. This was not only pastoral but formative for me as I discerned what healthy priestly leadership looks like.

In parish life, Fr. Dan modeled relationships rooted in fairness, respect, and careful listening. He did not rely on favoritism or surface gestures of inclusion, but on steady, thoughtful engagement that built trust across differences. His way of fostering community gave me a living example of how a priest can honor the dignity of each person.

From my perspective, Fr. Dan's ministry embodied equity in relationships, and that has shaped my own understanding of how to serve the church faithfully.

Sincerely,

Philip Buerk

2939 S Mount Baker Blvd B6

Seattle, Wa 9814

727-739-5000

From: Diana Uhlman <duhlman@outlook.com>
Sent: Friday, September 26, 2025 8:48 PM
To: dstambaugh@wispearl.com
Subject: Father Dan McClain

I am writing in support of Father Dan McClain. I am an Episcopalian and began attending St. Paul's in Oakwood, OH, after moving there in the winter of 2022 from Holy Trinity in Oxford OH. Just so it is understood that I am not naive in these matters, at Holy Trinity I was a member of search committees for new priests, a member of the Vestry for several terms, a junior warden and on multiple committees.

At St. Paul's, Father Dan immediately welcomed and introduced me to various members of the congregation, made sure I was receiving church communications and felt comfortable as a parishioner. Throughout the next year at least (I am unsure about the timing of things), I was impressed by the activity levels at the church and the quality of the services, and I was certainly made to feel that I could call on Father Dan for whatever I needed. Overall, Father Dan seemed to me to be doing all the things a conscientious rector should be doing—and indeed, I felt in terms of preaching and services, in terms fostering inclusion and social conscience, he was superior to many rectors I had known.

Although I heard vaguely bits and pieces of what had gone on before I came to St. Paul's, to my mind it was not important to my spiritual health since the problem seemed to be based on a power struggle between long time parishioners and new faith leadership. I decided to avoid gossip about it, trying to stay focused on Father Dan's performance as I saw it. And that performance was good. No one has ever interviewed me or asked my opinion about it, and I have never spoken to Father Dan after he disappeared from St. Paul's. I rather think it is a shame that someone with his talent, organizational abilities—his spiritual and faith leadership—has been dismissed from the diocese.

Thank you for your attention,
Diana Uhlman

Get [Outlook for iOS](#)

Andrew Gonzalez
4650 Portofino Way
#108
West Palm Beach, FL 33409

To whom it may concern:

I was not contacted by the diocesan attorney or investigator in their investigation of Fr. Dan. but feel as if it's important to share my own experience with Fr. Dan and his ministry. I got to know him during my time as I served as a verger, acolyte, lector and lay Eucharistic minister.

I came to St. Paul's during a difficult move and about a year removed from the COVID-19 pandemic. Spiritually, I was looking for a home parish that valued the Book of Common Prayer, the Anglican tradition, and liturgy. St. Paul's provided that, and much of it was due to Fr. Dan's leadership.

My move to St. Paul's came shortly before his first leave of absence from the parish. Given my own history with past clergy in other parishes, I wasn't in a place to give Fr. Dan the benefit of the doubt at first. Because of that, I remained a bit suspicious. Though the more we interacted, the more Fr. Dan grew on me.

Fr. Dan and I worked closely together Sunday mornings, oftentimes he and I were the only ones on the altar during the early Eucharists. Watching him celebrate the liturgy was special. During my time in the Episcopal Church, I don't recall ever seeing a priest who was as reverent behind the altar during the Eucharistic prayers, or whose preaching was so deeply rooted in Christ and Church history. Truth be told, Fr. Dan has an Anglo-Catholic liturgical style. It could take someone who isn't used to it, but he treated the liturgy and the Book of Common Prayer with the utmost respect.

Beyond the liturgy, Fr. Dan worked to bring the parish together. He started integrating a shared coffee hour between the two services so people who attend both, who may not normally interact with each other, could. Looking beyond the parish, he worked to bring the community together through an Anglican Christmas Festival, promoting our heritage. It was clear Fr. Dan cared deeply about the community and parish he served.

Because of all of Fr. Dan's work, I saw something that up until then was an unusual sight for me: young families and young people at an Episcopal Church. From talking to them, they saw what I saw, Fr. Dan was someone who took Christ and the faith seriously, and in doing so inspired us to do the same.

On a personal note, seeing Fr. Dan's ministry at St. Paul has even inspired me to discern where God may be calling me.

It's unfortunate the allegations and Title IV process has played out for as long as it has. Having read the documents, it's unfortunate that the good Fr. Dan has done for the parish and spiritual life of those of us who attend. So far, it appears those voices have been ignored through this process.

Please feel free to reach out to me if you have any questions about my support for Fr. Dan.

In Christ,

Andrew Gonzalez

Phone: (786) 219-6438

Email: andypgonzalez@gmail.com

From: Graysen Schaney <graysen.schaney@gmail.com>
Sent: Friday, September 26, 2025 10:50 PM
To: dstambaugh@wispearl.com
Subject: Father Dan McClain

9/26/2025

To Whom It May Concern,

I was NOT contacted by the diocesan attorney or investigator in their investigation of Father Dan.

I write today in support of Father Dan regarding the concerns raised about his ministry. I met Father Dan through his service at Saint Paul's, and my personal experience with him has been profoundly positive.

Before encountering Father Dan's ministry, I often struggled to feel connected to my faith. Through his homilies, guidance, and presence, he helped me see religion in a completely new light. His ability to communicate the Gospel message in a way that was both relatable and inspiring brought me closer to God and gave me a renewed joy in attending church.

Father Dan's dedication to his parishioners has been evident in the way he fosters a welcoming and thoughtful environment. His encouragement has not only strengthened my personal faith but has also deepened my relationship with God. From my perspective, Father Dan has been a source of spiritual growth, compassion, and guidance, and I have always found him to embody the values of his vocation.

If needed, please don't hesitate to contact me for any further explanation.

Sincerely,

Graysen Schaney

(937) 572-4752

My name is Charles “Henry” McClain. I am the proud oldest son of The Rev Dr. Daniel McClain. I am a Midshipman in the Navy and a student at The Holy Cross College at Notre Dame Indiana. I was a very active member of St. Paul’s Episcopal Church and the surrounding community. I graduated honor roll from Oakwood Highschool, I owned a small landscaping business in the neighborhood, I was a regular acolyte, I was elected a diocesan convention representative for St. Pauls, and was a charter member for the Episcopal youth YETI council.

On April 19th of 2022 my mother, who I will refer to as Katherine McClain, fabricated an untrue, abhorrent, and revolting story about my dad to get a Civil Protection Order (CPO) against him, in a power play to get an upper hand in the divorce she was about to initiate. When I came home from school that day in April, Katherine tried to kidnap me and take me away with my three younger brothers. I refused knowing that she was lying, so she left me there. For the following month I did not stay with my mother, and could not stay with my father due to the CPO.

My first experience with the Episocpal Church during the Title IV process was when I overheard Katherine McClain having a phone conversation with Bishop Wayne Smith. When I was living with another family, I went to a dentist appointment that Katherine McClain and my younger brothers were also at. While I was there I overheard Katherine McClain having a phone conversation with Bishop Wayne Smith. When I discovered this I asked to speak with him as well, I thought that someone from the Church may help me. Later that day, I was working at my local martial arts gym. Katherine McClain was dropping my brothers off for the classes they attended at the gym and told me I could speak with Bishop Wayne Smith. But during my phone conversation with Bishop Wayne Smith my excitement that someone may listen to me about the atrocity that was happening in my family quickly faded into disappointment when Bishop Wayne Smith told me directly and clearly that he was going to persecute my dad and get my mother “justice”. I told Bishop Wayne Smith clearly that I knew my dad was innocent, and that Katherine was lying. I also told him about my inability to live with my mother or my father, and how Katherine was physically and emotionally abusing my brothers and me. After that, I never heard from Bishop Wayne Smith again.

But Bishop Wayne Smith did write a letter to the St. Paul’s congregation which made the CPO and Katherine’s allegations against my father, which was previously private information, public. The consequence of Bishop Wayne Smith’s letter was a news story being published on the front page in the local newspaper, the “Oakwood Register”, that my dad is an alleged abuser. This is a newspaper that is delivered to every house in Oakwood, where I was living at the time. The next day most of my high school peers had read the article. It was so well known I was called into the office to make sure I was doing alright. Coincidentally, this was the same newspaper edition that I was announced as making honor roll. So not only did Bishop Wayne Smith not offer me any pastoral support, he directly affected my life negatively.

Later when I attended Bishop Kristin White’s consecration, I attempted to speak with Bishop Wayne Smith, but it seemed that once he saw me, he literally ran away in the other direction to a bishop-only room. Bishop Wayne Smith’s behavior seems to be consistent with the

other leadership in the Episcopal Church, because no one from the Episcopal Church ever reached out to me during this situation. The only priest that offered me support in this ordeal was a Greek Orthodox priest, who is a close family friend.

Even though I had received no support from the Episcopal Church, I attended St. Pauls a few times. When I did, I heard some of the people who intend to testify against my dad spreading rumors about him. Specifically the allegations regarding marital abuse. I was transparent with them that I found this disgusting and completely untrue. They were not receptive to this. Later I attended a reconciliation / future planning Church meeting and witnessed some of my dad's accusers attempting to spread their lies. In front of most of the congregation I calmly argued against them, while they got in my face and yelled at me. I saw that there was an extremely small minority conspiring against my dad. However, the majority of the parishioners supported me and stood up for me.

At the beginning of the Title IV process, friends of mine who were also at St. Pauls stopped talking to me. I have recently reconnected with one of them. They told me that their parents forced them to cut me off. They confided to me that they disagree with their parents and believe that they are wrong.

Throughout this situation I witnessed a total failure of the Episcopal Church. The cowardice and moral depravity of Bishop Wayne Smith seems to accurately represent the rest of the Episcopal Churches' leadership. This is apparent to me because I have not received even an email from someone in the Church. Furthermore, the fact that an innocent man, my dad, is being persecuted over allegations that have been, and are easily dismantled. On top of that the complete disregard of protocol that at best lead to a disruptive news article in my neighborhood, and at worst has attempted to destroy an innocent man's life. The behavior of the Episcopal Church and those in charge of this situation is the antithesis of what a Church is supposed to be. As a fifteen year old I chose to not live with my mother until I was allowed to live with my dad, because of the evil lies she was purporting. It is sad that no bishop has ever reached out to me, as a son of a priest.

Dr. Jevan Furmanski
358 Beverly Place
Oakwood, OH 45419

September 25, 2025

Dear Ms. Stambaugh,

I was not contacted by the diocesan attorney or investigator in their investigation of Fr. Dan. This was surprising to me at the time, not only because so many others (mostly non-attending) were interviewed, but I also had written multiple communications to the Diocese on the subject (not to mention being a lay leader in the church). I am attaching contemporaneous letters that I wrote to the Diocese following both the first and second Title IV investigations, in which I communicate my view that Fr. Dan represents the best of the Episcopal Tradition (through orthodox theological analysis and commitment to the Book of Common Prayer) and also that he successfully shepherded our church into a vivacious spirit-led community. These letters also communicate my views on the manifest injustice of a proceeding that was one-sided in its gathered testimony and faithless treatment of a presumptively innocent priest while implicitly giving consent-by-silence to a litigation by proxy and character assassination campaign in the public sphere conducted by a notorious anti-church tabloid. My views on Fr. Dan's excellence as a priest and church leader are undimmed by the time elapsed since he and the congregation were separated. I would elaborate more on this here, but I feel that my views contained in my contemporaneous letters are both more poignant and carry more authority as having been written in media res. Please convey this note and the accompanying letters to the panel hearing Fr. Dan's case. I cannot conceive that one reading those letters could understand them to contain anything other than an earnest dedication to the truth and faithful service to God, and entirely the unique product of my (and my wonderful wife's) mind.

I would, however, like to add my current perspective and reflections here. The benefits of time and separation from the events stemming from accusations against Fr. Dan have not lessened the feelings of disgust and astonished despair that arise whenever I contemplate this case. My faith in the Episcopal Church has been shaken to the core. The bishops leading the proceedings expressed no loving-kindness toward either the accused or to the community of St. Paul's Church. To the contrary, the diocesan attorney shockingly released a public letter openly declaring that those of us who remained at St. Paul's and by so doing supported Fr. Dan were merely manipulated and in thrall to him. This letter was published despite numerous entreaties to the diocesan leadership to come and worship with us and see that the spirit is with us, to taste and see that the Lord is good. For no one who worshiped with us at St. Paul's in 2022-2024 could possibly say that our worship and liturgy were anything other than beautiful and faithful and authentic and orthodox and meet and right. I will never understand why the bishop never came to worship and witness with us. When Fr. Dan was finally and formally separated from St. Paul's, only then did Bishop White come to St. Paul's to administer a service for healing for the congregation, making the act of healing and invocation of grace seem somehow contingent or even *boughten*. I attended this healing service, and was further struck by how the bishop and her invited co-celebrants worshiped

the liturgy at the congregation, rather than engaging in worship with the congregation, with the Diocese as agent and St. Paul's as patient. The profound failure of the Diocese of Southern Ohio to minister to the congregation of St. Paul's, its support of a monstrous campaign of destruction by action and inaction, and its overall bloodless and godless approach to these matters has shaken my faith: how can such bishops, as God's direct representatives on Earth, behave like self-interested CEOs of some non-profit corporation? What then even is the point of having a church that is run as a corporation? If the Episcopal Church cannot stand on the side of that which will endure, and instead insists on clinging to that which must pass away, then I have to say that it should just pack it in and make a giant donation to strangers, widows, and orphans in Jesus' name. I desperately hope that justice can be done in this case, not because justice in this small thing necessarily will move the world, but precisely because a persistent commitment to justice and truth in the small things implies and creates commitment to justice and truth across the universe. And, indeed, how the Church is seen to stand or fall on its commitment to the most essential tenets of Christ's teachings will determine the fate of the Church in a flawed world.

I have communicated this letter with respect in my heart to those giving consideration to this matter, alongside my love for our Lord Jesus Christ, who taught that we should ever thirst for justice and truth, and to minister first to the least and the lowest.

Sincerely,

Jevan Furmanski

Dr. Jevan Furmanski
Mrs. Kate Furmanski
358 Beverly Place
Oakwood, OH 45419

February 13, 2024

To: Members of the Title IV Hearing Panel in re: The Reverend Dr. Daniel Wade McClain, Case No. 2023-01: The Right Reverend Bavi E. (“Nedi”) Rivera, The Reverend Canon Brian Reid, Amy Howton, Dr. Spencer Pugh

CC: The Right Reverend Kristin Uffelman White, The Right Reverend Susan Haynes, The Reverend Canon Stephanie Spellers, The Right Reverend George Wayne Smith, The Most Reverend Michael Curry, The Reverend Dr. Daniel Wade McClain

Enclosures (2):

- “From Bishop Rivera: Title IV Hearing Panel Update February 1, 2024”
- “Written Statement of the Case (Complaint) in re: The Rev. Dr. Daniel Wade McClain, Case No. 2023-01”

Dear Members of the Hearing Panel:

This letter is regarding the Title IV investigation of Fr. Daniel McClain, Rector of St. Paul’s Church in Oakwood, Ohio, who is referred to as “Respondent” in a Written Statement (enclosed) that was recently publicly released by the Hearing Panel on the website of the Diocese of Southern Ohio.

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This letter communicates the following:

- The Written Statement characterizes current St. Paul’s parishioners as irrational and in thrall to Fr. McClain, without a good-faith attempt to interview them and understand their thinking.
- The Written Statement reprints allegations and hearsay as fact without seeking out available witness testimony to corroborate or refute the claims. Indeed, the Written Statement seems to avoid critical evaluation of its claims.
- The public release of the Written Statement gives imprimatur to allegations originating from a notorious anti-Church website, enabling these allegations to be reported by journalistic media, and so constitutes Conspiracy Laundering. The release of the Written Statement amounts to an outrageous act of character assassination and is extremely damaging to the Church, and indeed to the very concept of Christian Orthodoxy.
- The Written Statement accepts the proposition that the withdrawal of large value pledges over personal grievances proves and/or is misconduct by the Rector. We maintain that the withholding of pledges as a means of exerting pressure, based on the assumption that larger pledging translates into outsized influence, is in fact evidence of the corrupting power of money in Church affairs, and that it is manifestly un-Christian. We further propose that the Written Statement, with its salacious and inflammatory airing of unsubstantiated

allegations by aggrieved former parishioners, is substantially a product of this corrupting influence of money on Church governance.

- We close with a heartfelt appeal to our Christian brothers and sisters on the Hearing Panel, and all those who have found cause to leave St. Paul's, to please come and worship with us. We feel that St. Paul's is experiencing a renaissance of worship, owing to a recommitment to orthodoxy in our study of scripture, and to orthopraxy through a renewed engagement with the full range of ancient and contemporary aspects of Anglican Tradition as collected in the Book of Common Prayer and the canon of sacred music. We invite the above named, and indeed the entire world, to come worship with us and witness with us the awesome and manifest presence of the Holy Spirit in the midst of us when we gather together in praise of the Glory of God.

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Dear Members of the Hearing Panel:

We are writing to communicate disappointment in the contents of the released Written Statement, and in the decision to release this document to the public. We have struggled to imagine how the Written Statement and its release serve the causes of justice, reconciliation, or the invitation of grace and the Spirit into this situation. While we look forward to a dialogue based on these principles, we feel the need to communicate to you how the contents of the Written Statement and its release have been interpreted. While the two of us only speak for ourselves in this letter, we will encourage other members of our community to raise their voices and concerns to you in similar manner.

First, the Written Statement broadly characterizes current parishioners at St. Paul's as "those who support Respondent," as a monochromatic group that is somehow in thrall to him, owing to his being a "very good manipulator." It plainly states without qualification that "persons who are disenfranchised or hold grievances seem to find him attractive." This characterization paints the current regular attendees at St. Paul's as a uniform, brainwashed cult, hanging on Father Dan's every word rather than thinking for themselves. This is offensive in the extreme, to us and to the dozens of other Christians with whom we worship and serve every week. We are not in thrall to anyone, and we utterly reject that we have been manipulated by Father Dan into supporting his ministry. We reject in the strongest possible terms that the parishioners of St. Paul's attend and worship with anything less than their full agency and free intellect applied to the task. This would have been plainly evident if the statement authors had endeavored to speak to anyone currently active in our congregation besides the Wardens, or attended even one of our magnificent Eucharistic services.

Then, although the Written Statement does not even attempt to substantiate its characterization of the current parishioners as gullible devotees, it nevertheless uses this false characterization as grounds to insinuate that the current parishioners' opinions cannot be trusted and are not even worth consulting. When current St. Paul's parishioners are referred to, they are labeled as "supporters" or "strong supporters of Respondent"; when former parishioners are referred to, they are never correspondingly labeled as "opponents of Respondent" but are merely called

“interviewees”, “parishioners”, or “persons”. This implies that, while current attendees cannot be trusted to think for themselves, former attendees can. Even the current Wardens are tarred with this brush: their opinions are dismissed on the grounds that the Wardens are “supporters of Respondent and not surprisingly feel that the parish is a better and happier place...” The classification of individuals as “supporters of Respondent” is prejudicial, as it implies that they are neither impartial nor fully rational. This is a shockingly disrespectful way to speak of your brothers and sisters in Christ and the members of your own diocesan fellowship. To insult your own church family like this in private communication would be bad enough, but to do it in a public document that was released to the media is a betrayal.

We would like also to take issue with the nature of the Written Statement, which appears not to have been based on a genuine investigation of the facts. While the authors state they have conducted interviews, the majority of the Written Statement is functionally equivalent to allegations as they appear on the website “Anglican Watch,” (AW) a notorious tabloid that rejects journalistic ethical constraints on what it prints, stating bluntly on its “About” page, “We do not claim to be unbiased.” While the author of this website was involved in originating the Title IV complaint, that in no way alleviates the need to independently substantiate or contextually qualify his allegations if the ensuing investigation is to have the integrity sufficient to serve justice. Instead, the Written Statement appears to credulously reproduce the allegations made by AW, even to the point of appearing to be plagiarized. Rather than engaging in investigation, the statement authors have re-printed pre-existing allegations without attempting to qualify them or test them for veracity. One of several instances in which the statement authors did not attempt to verify hearsay by consulting other parties or witnesses occurs on page 12, in a story about a phone conversation that took place between “a specific member of the parish” and Ms. McClain. The story as printed in the Written Statement distorts the context, content and tone of this conversation, but it can nevertheless be recognized by the “specific member of the parish” in question. We know this because that specific member of the parish – the only other person with knowledge of the conversation – was one of us. No effort was made by the Investigator (or AW) to contact the other party to the conversation to verify this allegation, which as a result went to press containing factual inaccuracies. This and other exaggerated or twisted anecdotes are reproduced in the Written Statement such that they appear to be given official sanction as verified facts. Their being treated as facts then lends weight to otherwise unsupportable claims that Father Dan is “manipulative, vindictive, and intransigent”. The Written Statement reflects no attempt to gather evidence that would be contrary to these claims; this is in keeping with the tendency noted in the previous paragraph to dismiss the testimony and opinions of all those who do not already agree with the statement authors about the Respondent’s character and behavior. For this reason, the Written Statement does not qualify as an investigative report.

The decision by the Hearing Panel to release such a flawed, one-sided, and intellectually dishonest document to the public is problematic in the extreme. Copy-pasting anonymous allegations onto official letterhead in order to imbue the allegations with the appearance of authority and veracity is a deception that one might call “Conspiracy Laundering,” and is commonly practiced by less scrupulous media outlets. The release of this Written Statement in the format of a signed official document appears calculated to achieve just this kind of laundering of anonymous and

unchallenged allegations into apparent facts in order to have them distributed through legitimate (though apparently also credulous) journalistic media. This would be disturbing even if our organization were not a religious body whose members are instructed to rebuke one another with love and respect, as one would rebuke a parent or a sibling (1 Tim. 5:1-2). That our own church would calculatedly engage in the conspiratorial character assassination of one of its own in the news media – without even offering a chance to respond to the allegations at the time of their release – is an outrage. Furthermore, its result is to tarnish in the minds of ordinary people the legitimacy of an authentic, ancient sect of Christianity, and by extension, the very notion of Christian Orthodoxy. The public humiliation of our clergy with unchallenged, anonymous, salacious, vindictive, and petty accusations only makes our systems appear debased and mundane, just like everything else in this world.

There is one other thing we would like to point out about the Written Statement: something offensive, but also in its own way, tremendously instructive. On page 7, in a paragraph that is about membership numbers and not finances, we find the following: “it is alleged that those who had returned to St. Paul’s during Respondent’s leave, along with several others, had left the parish. Apparently, a number of the parish’s larger donors were included in the departures.” While the departure of several parishioners appears as one indictment against the Respondent, the loss specifically of large donors is presented as an especially noteworthy indictment. The Written Statement also goes on to include 2019 financial information for St. Paul’s (pre-pandemic and pre-Respondent), and also for 2022, appearing to allege that the loss of pledge income at the church is a direct result of malfeasance by the Respondent. We were initially baffled when trying to understand why an investigation into allegations of conduct unbecoming of a priest would contain church budget and financial information. The investigator and the aggrieved interviewees are making the following argument: 1) large donors would only withhold their pledges for just cause; 2) the budget deficit of St. Paul’s is a direct result of the withholding of large pledges; 3) therefore the financial peril of St. Paul’s is evidence that our former large donors’ grievances against the Rector are just and that the allegations of conduct unbecoming of a priest are true. We would like to propose an alternative interpretation: 1) large donors believe that their pledges give them a proportionate and controlling influence in church governance; 2) in the present case, a number of large donors developed grievances against Father Dan, and withheld their pledges to force him out of his office; 3) when St. Paul’s leadership called and sustained Father Dan as Rector, they saw that this would not work on a parish level; 4) the present Written Statement is largely a work compiling the grievances of large donors without challenge or qualification, and represents an attempt to apply the same tactic on a diocesan level to cause the diocese to remove Father Dan from his office. The assumption that money buys influence in church governance is a corruption, and the Written Statement appears to be a direct result of this corruption. Giving influence and credence to grievances in proportion to monetary contributions is monstrous and manifestly un-Christian. The one assertion in the Written Statement that we partially agree with is the assertion, attributed to the St. Paul’s Wardens, that the “parish is a better and happier place, now that most of those who were unhappy with Respondent have left.” St. Paul’s has indeed undergone a renaissance in our worship and engagement with the Holy Spirit in the last year, and we would propose that this may have been related, not to the departure of any parishioners themselves, but

to the departure of the corrupting influence of large strings-attached pledges and their distorting effects on parish life.

All churches require donated money to operate, and all churches therefore struggle against the corrupting influence that necessarily follows money wherever it goes. In the world, those with more money wield more power; in the church, in contrast, we say that to show partiality based on riches is to sin (James 2:9). If we favor the rich because they are rich, we are really serving ourselves: we know that their money gives them power to help us achieve our goals and get things we want. Therefore, giving larger donors a larger say in church affairs to keep them giving large amounts is completely at odds with the idea that the church is Spirit-led and Christ-imitating. The risk of corruption is even greater in cases where a handful of very large donors are supporting the church almost singlehandedly: in that case, those very large donors might come to feel that they effectively own the church, and ought to have things their way by rights. In such a situation, they might feel that anyone who resisted their self-imposed primacy was trying to wrest their property from them. A parish might indeed become a better and happier place if those larger donors were to withdraw their strings-attached pledges and attendant influence – just their pledges, mind you, not their persons – even if this led to a substantial budget deficit. Ideally, a season of forced abstinence from reliance on large donors could free a parish from the temptation to favor the rich, and a season of forced abstinence from wielding undue influence could free the rich from feeling that they always have to lead, enabling them to just enjoy corporate worship. Furthermore, the experience of seeing ordinary people without great riches make sacrifices to sustain the parish through many smaller pledges could inspire people of any income to seek an authentic bond with their own community, and a deep sense of their own personal contribution to God's project on the Earth. Indeed, embracing giving in proportion to income in place of large pledges and donations may be the best means we have of resisting the corrupting influence of riches in the church. The future of our church, and indeed that of The Church, lies not in forging closer connections with Capital, but in communicating our relevance and the beauty of our worship to our communities and everyone in them – and thus growing a community of worship that will stand for centuries to come.

Finally, we would like to balance the expression of our disappointment with a heartfelt invitation and affirmation. As current parishioners of St. Paul's we are confident that, if any (or better, all) of the members of the Hearing Panel were to come and worship with our congregation, most of the contents of the Written Statement would be revealed as cruel misrepresentations. The Spirit of the Living God is palpably manifest among us in our worship at St. Paul's. This sense has grown tremendously throughout our time with Father Dan, and we credit most of this growth to his calling us and empowering us to listen more attentively to Christian scripture, tradition, and reason and to live out what we learn more authentically. Father Dan has led our congregation back into authentic engagement with the full breadth of Anglican Tradition. He has urged Orthodoxy through his deep analysis of scripture from the pulpit, bringing to bear the writings of theologians and philosophers from the most ancient to contemporary, and relating these issues meaningfully to the present lives of the congregation. He has urged Orthopraxy through reinvigorating the ancient and contemporary liturgical traditions preserved in the Book of Common Prayer. Especially through the guided flourishing of our music program and the practice of a sung Eucharist, he has formed

us into a shining example of how a church can be unabashedly both ancient and contemporary, both serious and spontaneous, both glorious and humble, and thereby truly serve as a light of Christ's love unto the world. Please, please, please, come to St. Paul's and worship with us. Taste and see. In so doing, we think you will recognize the Grace and Love of the Lord, and you will also find that we are a loving and healthy congregation, and that our love and faith have grown tremendously in the presence of Father Dan as our Priest and Rector.

Sincerely, and with respect,

Jevan Furmanski

Kate Furmanski

July 10, 2022

The Right Reverend Wayne Smith
Bishop of the Diocese of Southern Ohio
412 Sycamore Street
Cincinnati, OH 45202

Dear Bishop Smith,

We are parishioners at St. Paul's Church in Oakwood, and we are writing to you to air our thoughts on a topic very close to our hearts as both parishioners and, more broadly, as Episcopalians and Christians. We believe that Father Dan McClain represents the very best of what the Church has to offer as a spiritual leader and as a theological scholar. Father Dan worked to reinvigorate our parish by offering deep lessons in the Anglican traditions of prayer and worship, including our Church history, and he did not seek to reduce these subjects to simple "fun facts" but reveled in their richness, showing by word and example that the most complex and even self-contradictory passages and prayers can be invitations to seek a profound relationship with God. His biblical scholarship was plainly evident through his challenging and insightful sermons, in which he not only explicated the readings but sought in every case to connect high theological concepts to the actual lives and choices of the gathered audience. He worked tirelessly to build the community of St. Paul's into one where these ideals were ascendant. From our first interaction with Father Dan to the last, his talent and dedication to establish St. Paul's as a remarkable worship institution were clear to us, and we were and remain inspired to dedicate our own talents to continue the work that he began.

With the resolution of the Title IV proceedings, the Diocese will undoubtedly make a recommendation as to future clerical leadership at St. Paul's. The Vestry are likely already considering which attributes they would look for first in any candidate. While we are not privy to any such discussions, we would like to express concern about and caution against the prioritization of attributes intended solely to minimize conflict, such as an avoidance of theological controversy or a calculated low probability of scandal. If Father Dan is displaced as our priest, and replaced by someone who is so uncontroversial as to be unremarkable, we fear that our congregation will be at risk of slipping into a less impactful approach to worship and a less costly approach to grace. We believe that the challenge of thoughtful clerical leadership is essential to our lives as Christians in the world, and we are concerned that the selection of alternative clergy with a focus on "not rocking the boat" will result in harm to our spiritual progress and also that of the St. Paul's community at large.

We thank you for the care you have taken to understand our concerns. We were motivated to write this letter partly in response to a passage from the Eucharistic Prayer (Form C): "Deliver us from the presumption of coming to this Table for solace only and not for strength; for pardon only and not for renewal. Let the grace of this Holy Communion make us one body, one spirit in Christ, that we may worthily serve the world in His name." We are passionate and hungry for the strength and

renewal that come from a profound, corporate relationship with God, that we may all serve the world in His name. We sincerely hope the actions of the Diocese and Vestry in the coming months will support St. Paul's in the best aspects of our traditions, enabling our congregation to be as a beacon to the world.

Respectfully,

Jevan and Kate Furmanski

From: Laura McGuire <mslmagoo@gmail.com>
Sent: Sunday, September 28, 2025 3:09 PM
To: dstambaugh@wispearl.com
Cc: Laura McGuire
Subject: Dan McClain

Dear Ms. Stambaugh,

First, let me say that I was not contacted by the diocesan attorney or investigator in their investigation of the Rev. Dan McClain. Dan reached out to me as someone who has worked with him off and on for years and was happy to be invited to serve as a lay minister on the day of his priestly ordination. I have worked in the Episcopal Church and other faith traditions for over 30 years, serving as a leader of the Episcopal Diocese of Maryland's Safe Church trainings for about 20 years.

I met Dan when he was a member of the Cathedral of the Incarnation and teaching at Loyola University Maryland. I've seen him teach, preach, and preside. I've accompanied him to music venues for concerts! Baltimore is a small town masquerading as a city, and I am friends with people who lived on the same block as Dan. In my role as a Godly Play trainer, Dan and his family even hosted me in their Williamsburg home for an extended weekend.

In the many contexts I have seen Dan work, from professor, father, volunteer, and parish priest, I have never seen him behave in any manner that has given me concern. He has shown himself to be a devoted minister in the church, a loving father, and an open and friendly presence in the community.

Peace,

Laura McGuire
310 Woodbourne Avenue
Baltimore Maryland 21212
410-949-6104

Peace,

Laura

From: Aaron Meece <ajmeece@winsupply.com>
Sent: Friday, September 26, 2025 9:57 AM
To: dstambaugh@wispearl.com
Subject: Fr. Dan McClain

9/26/2025

To Whom It May Concern,

I was NOT contacted by the diocesan attorney or investigator in their investigation of Fr. Dan.

I am writing to provide a letter of support on behalf of Fr Dan McClain, with whom I was acquainted during his time as pastor at St. Paul's Episcopal in Oakwood, Ohio.

During the period in which I was associated with Fr. Dan, I never witnessed or experienced any impropriety or behavior which would suggest any unhealthy relationships within the parish with Fr. Dan. My interactions with him were consistently professional, respectful, and aligned with the responsibilities of his pastoral office.

I am willing to be contacted should further information or clarification be required.

Respectfully,

Aaron J Meece
937-974-3573
aaronjmeece@gmail.com

From: Ruth Anne Alexander <kitzelmich@gmail.com>
Sent: Thursday, September 25, 2025 5:20 PM
To: dstambaugh@wispearl.com
Subject: Fr. Dan's Investigation

I was not contacted by the diocesan attorney or investigator in their investigation of Fr. Dan. I am a long time member and Sunday school teacher at St. Paul's (1991). Dan was an excellent priest and preacher. He cared deeply about the people of St. Paul's, the children and the Children's program. Thank you for the opportunity to share my very positive experience with Fr. Dan.

Ruth Anne Alexander.

25 September 2025

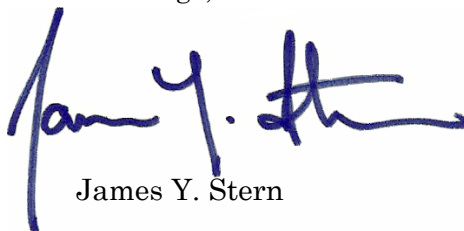
Brothers and Sisters,

I'm writing about Fr. Dan McClain in connection with the Title VI process initiated with the Diocese of Southern Ohio. I am a parishioner at Bruton Parish Church in Williamsburg, Virginia, where Fr. Dan previously served as Associate Rector. I have not been contacted by anyone connected with the Diocese or the investigation, and I wanted to communicate my experiences with and impressions of Fr. Dan, in the hope that they may be of some help in the process now underway.

I came to know Fr. Dan quite well in his time at Bruton, in part because he served as Episcopal chaplain to the College of William & Mary, where I teach. I saw his interactions with parishioners, students, and his children, all of which I would describe as broadly positive. He was a thoughtful pastor and preacher—earnest, available, and conscientious. He had his eccentricities, to be sure, and I don't doubt that they are not to everyone's taste. As an academic, it's a pattern I encounter a fair bit. But he always appeared to me to be a dedicated man of God, who had thought about matters deeply and was committed to the work of the Church through and through. I was very sorry when he left.

I hope that these impressions are helpful. Please let me if I can be of any further assistance.

Blessings,

A handwritten signature in blue ink, appearing to read "James Y. Stern". The signature is fluid and cursive, with a large initial "J" and a stylized "S".

James Y. Stern

September 25, 2025

To Whom It May Concern:

I am writing this letter regarding the time I was a parishioner at St. Paul Episcopal Church in Oakwood, Ohio where Fr. Dan McClain was the Priest in charge. I attended St. Paul from October 2022 to August 2023. I experienced a very active church where Fr. Dan regularly held Eucharists and Feast days. My experience and perception was that St. Paul was actively and attentively run and cared for.

Thank you,
Paulette Strolia-Davis

From: Ellen Walters <ellenwalters75@gmail.com>
Sent: Friday, September 26, 2025 2:57 PM
To: dstambaugh@wispearl.com
Subject: Letter in support of Fr. Dan McClain

To Whom It May Concern,

I was not contacted by the Attorney for the Diocese of Southern Ohio or by their investigator during their investigation of Fr. Dan McClain. I am a 38 year member of St. Paul's Episcopal Church. All three of our children were baptized and confirmed there, as was my husband of 50 years. I am a member of the Altar Guild, the Parish Life Committee and was a member of the Vestry Nominating Committee. I knew Fr. Dan primarily as our Parish Priest. The warmth and friendliness that he exuded is what first impressed me. Next, were his homilies. They were fantastic! You could tell that Fr. Dan had an academic background with his cogent sermons yet they were easy to comprehend. The depth of content was something that St. Paul's had not experienced in any sermons I had ever heard. How refreshing and exhilarating!

My initial exposure to Fr. Dan was at an outdoor service he held when he first arrived at St. Paul's. How unique! It was a beautiful Sunday and we all brought folding sports chairs. I knew we had someone special leading our Parish.

With most of our Priests, I tended to bypass as I left the service, scooting out the side aisle. Fr. Dan was so engaging, that I wanted to greet him and thank him for his insights each time. It was just a very different feeling attending church when Fr. Dan was our Priest. You wanted to be there and pay attention. You wanted to get involved.

Fr. Dan was very interested in attracting new, younger members to grow our Parish. Our Parish had grown very divisive over the years, which caused me to not get involved beyond the Service. It seemed like many of the older members used the Church as a power play for their own needs. I wanted nothing to do with that or them.

But as Fr. Dan instituted new formation groups, new bible studies, new opportunities to reach outside ourselves, it became more attractive to get involved. St. Paul's was reaching out to the neighboring communities and we were getting attendees at many of our events. We had musical events, educational forums, and Christmas pageants. It was fun to be a part of a thriving Parish.

But then, ugliness reared its head and things came crashing down. People were sabotaging our newfound energy. I am so sorry that Fr. Dan became the recipient of all that evil. I am still trying to remain active at Church and pray that we are able to attract and retain another Priest half as vibrant and kind and caring as Fr. Dan McClain.

Thank you.

Ellen Walters

To whom it may concern,

I was not contacted by the attorney for the Diocese of Southern Ohio or their investigator during their investigation of Fr. Daniel McClain. I am a member of the Vestry, an acolyte, bell choir ringer, member of the Parish Life committee, and lifelong parishioner of St. Paul's Episcopal Church. I worked with Fr. Dan in many different capacities during his time at St. Paul's and I knew him to be kind, intelligent, dedicated, and focused on growing and serving the community in which he was placed.

Fr. Dan brought people who had left back to St. Paul's, welcomed new parishioners from diverse backgrounds, and fostered the congregation as it grew even during a global pandemic. Seeing his sermon broadcast virtually on Christmas Eve 2020 called me to serve my church in new ways. I had stepped back when I was in college and graduate school because of the chaotic leadership changes at St. Paul's and infighting amongst parishioners. Fr. Dan was focused solely on growing the church and growing our faith and he accomplished that in his short time with us. St. Paul's was the most active I have ever seen it while under Fr. Dan's leadership. He led more formation groups, book studies, and community events than any other priest we have had before or since.

My faith grew so much during Fr. Dan's tenure. In particular, the 'Grow' formation experience was life changing. He drew parishioners together to read and discuss God's presence in our lives and discover what it means to live abundantly with God, each other, and all creation. This experience drew dozens of parishioners together to share and learn from one another and it is the closest I have ever felt with a group of people. It was so moving that participants attended worship Sunday morning as normal, and then came back Sunday evening for an evening prayer service followed by an hour and a half of discussion and community building. That clearly illustrates the environment Fr. Dan was fostering during his time at St. Paul's. Many of us still grieve the loss of his leadership, teaching, and counseling.

In faith,
Kathleen Walters

Diocese of Southern Ohio

The Right Reverend Kristin Uffelman White

kwhite@diosohio.org

The Reverend Canon John Johannsen

jjohanssen@diosohio.org

The Right Reverend Bavi E. "Nedi" Rivera

nrivera@diosohio.org

Amy Howton

ahowton@diosohio.org

Dr. Spencer Pugh

spugh@preachingfoundation.org

Dear fellow members of the Episcopal Church,

As a member of St. Paul's Episcopal Church in Oakwood, Ohio, I am writing to voice my support for the immediate reinstatement of our priest, The Reverend Dr. Daniel W. McClain and to express my frustration with the seemingly endless cycle of allegation, suspension, investigation, and reinstatement that has created immense harm to our church, our community, to Father Dan, and to his four sons.

I've been an attorney for almost 40 years and lived within walking distance of St. Paul's for 28. My family has had many opportunities to make St. Paul's our church home; however, we came away disappointed after each visit.

So when I decided to try once again, in January 2023, I was surprised to find a very different church. The knowledge and enthusiasm of Father Dan engaged me immediately. I was impressed with his love of St. Paul's, his desire to create a holy and sacred place of worship, his choice of religious artwork on the cover of each week's bulletin, the friendliness of the members of the congregation, the beatific choir and music, and the sense that this was a church that emphasized prayer and reflection unlike the unwelcoming clublike atmosphere I had encountered earlier.

I've been attending regularly since and had planned to be confirmed during the Bishop's visit in May (Father Dan's idea) although I have decided to delay confirmation until this latest investigation reaches a conclusion.

Father Dan has transformed St. Paul's Church and, in the process, appears to have been transformed. Perhaps there was a time, years ago, when he was too enthusiastic, too fixed on improving the church, too impatient with certain members. But I've seen no evidence of narcissism, of manipulation, or bullying. In fact, it's quite the opposite. He is warm and welcoming, hardworking, joyful, and with a great sense of humor.

Oakwood is a small community with just over 5,000 households made up of CEOs, lawyers, doctors, professors, engineers, artists and one Episcopal priest...in short, a highly educated populace with one junior high and one senior high. The average graduating class consists of only 160 students and to say that nearly everyone here knows nearly everyone else is no exaggeration. We also have one local newspaper, The Oakwood Register, delivered to every household weekly.

The front page of the Register has featured several articles about Father Dan, including allegations that he committed spousal abuse and salacious reports based upon the Diocese's publication of its

investigation that, frankly, reads like a tabloid. It seems as though the actions of the Diocese have been instigated by Mrs. McClain, Father Dan's estranged wife, and by someone who I understand to be a defrocked former priest who appears to be working with her.

In early 2022, shortly after Mrs. McClain's spousal abuse allegations were the lead story in the Register, and Father Dan was suspended by the Diocese, almost a dozen families (and \$100,000 in pledges) left St. Paul's. The suspension was subsequently overturned in August 2022 but significant damage was done based solely on an unsupported allegation.

In 2023, less than a week before Father Dan was scheduled to be installed, another allegation was made against him. The Diocese reacted without any concern for Father Dan, for our congregation, for Father Dan's children, or for his extended family who had traveled from out of state. Based solely on this claim, the timing of which was more than a little suspicious, the Diocese canceled the installation. The good members of St. Paul's subsequently showed their support for Father Dan by attending the planned initiation reception with open arms and hearts; however, at least two families left the church.

And now here we are again. Another complaint filed this time by someone in Virginia who routinely attacks priests and churches online and who doesn't attend St. Paul's. Headlines in the Register and the Dayton Daily News recounted old criticisms of Father Dan's personal life and leadership style and provided further humiliation for Father Dan's children (one of whom is an Oakwood High School student).

My husband and I are invested and active in Oakwood so I invited Father Dan to lunch last Spring with the intention of introducing him to community leaders. He later met with Debra Edwards, the then President of the Oakwood Historical Society, and Kristy Hale, the Director of Wright Memorial Public Library. Debra offered to assist with our 2025 anniversary celebration while Kristy hosted Father Dan at the Oakwood Rotary's weekly meeting.

It was my hope that he would continue to integrate himself into our community. But how is that possible when the Diocese continually suspends him? And how does he reclaim his good name when the Diocese publishes accounts from anonymous sources that I would characterize as defamatory. (In fact, several members of our church have asked if the Diocese can be sued.)

If the Diocese has chosen to close the doors of St. Paul's, then by all means keep going, you're doing great. If the Diocese wishes, however, to keep a strong presence in the Oakwood community, there must be a stop to this cycle of vengeance as these investigations and suspensions are damaging a good priest. Why the Diocese isn't supporting Father Dan as he struggles with an acrimonious divorce and the real fear of losing his children is beyond understanding. Inadvertently or intentionally, the Diocese has taken sides in the McClain's divorce to the detriment of Father Dan and St. Paul's.

If you want a glimpse of the future, I urge you to view the Montgomery County Clerk of Courts website, Case No. 2022DR00353 McClain v. McClain, and, in particular the March 18, 2024, Motion filed by Mrs. McClain, asking the Court to, once again, delay the divorce proceedings. I predict that another Title IV Complaint will be filed this Fall, conveniently timed to shut down our Christmas festivities.

Speaking of Christmas, imagine this. In December, at the end of a beautiful and heartfelt Christmas Nativity Play, a dozen children and teens excitedly exited the sanctuary. Father Dan was waiting in the narthex, crouched on one knee, where he met each child with a huge smile, an enthusiastic high five, and a heartfelt "broken leg!". They were delighted! This is a snapshot of the real Father Dan, one that is

completely missing from the Notice of Allegations of Canonical Offenses published in the Dayton Daily News, the Oakwood Register, and on your website.

Finally, and with all due respect, I urge you to revise the Notice of Allegations to omit when and how our Senior Warden met Father Dan (irrelevant), to correct the misconception that our vergers are employed by the church (false), to omit references to incense (incense?) and cats (gone long before I joined). But most importantly, to remove the anonymous allegation of threats or fears of physical harm. A truly damaging assertion made by an anonymous source and the Diocese publishes it? How, exactly, does Father Dan defend himself? The Diocese can and must do better than this hit piece on a good priest. I hope and pray (and hope you pray) that the Diocese can help and support Father Dan at this very difficult time. He, and we, are counting on you.

Sincerely,

Lu Ann Stanley

EXHIBIT “2”

Begin forwarded message:

From: Lori Babcock <loribabcock@verizon.net>
Date: February 16, 2024 at 9:58:19 AM CST
To: Daniel McClain <dwmccclain@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 <dwmccclain@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

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 “3”



ATLAS COUNSELING AND WELLNESS



BOB@ATLASANDWELLNESS.
GMAIL.COM

937-309-9740
6055 TAIN DR.
DUBLIN, OH 43017

October 6, 2025

I write to provide information regarding the Rev. Daniel McClain, Ph.D., who has been my client in psychotherapy since 2022.

As a way of introduction, I am a minister and was ordained by the Evangelical Lutheran Church in American. Through the Called to Common Mission agreement, I have served as an associate priest in an Episcopal parish.

I am also a licensed clinical therapist specializing in anxiety, depression, partner betrayal trauma, life transitions, and substance abuse. I have been in practice for over 30 years. I am trained in Gestalt therapy, Cognitive Behavior Therapy, Eye Movement Desensitization and Reprocessing therapy, Motivational Interviewing, and Internal Family Systems Therapy.

For over two decades, I have taught full time in the graduate school at Ohio State University, where I have won several teaching awards. Examples of classes I teach include trauma therapy, family therapy, and individual psychotherapy. My Ph.D. is from Ohio State and my M.Div., is from Trinity Lutheran Seminary at Capital University.

I have been working with Father Dan McClain in therapy since October of 2022. He has had over 90 hour-long individual therapy sessions with me. He has been consistent in therapy and rarely cancels appointments. He takes the therapeutic process very seriously. His work has focused on grief regarding his former marriage, and issues in his former parish and with the diocese. Also, Father Dan consistently seeks guidance about how to do what is best for his sons.

Father Dan's diagnosis is Generalized Anxiety Disorder (GAD, f41.1 is the accurate clinical code). He has processed many of his experiences in the congregation and diocese during the time we have worked together.

Father Dan does not meet the diagnostic criteria for any diagnosis other than GAD according to the Diagnostic and Statistical Manual of the American Psychiatric Association. I reviewed the psychological assessment by Midwest Ministry Development Service (MMDS), which I understand the diocese asked Dan to undergo. I concur with the psychological assessment by MMDS that Father Dan does not have other mental health disorders or addiction disorders.

While Father Dan does not meet the clinical diagnostic criteria for Post Traumatic Stress Disorder PTSD, his experience with the church process has been quite troubling for him and he does have features of complex trauma (an ICD diagnosis, World Health Organization) due to the many times that his character and integrity have been attacked. In my professional





opinion, some of this complex trauma is a result of the church process itself. For further information on Complex Trauma as compared to PTSD I recommend A. Schwartz 2016 work entitled the Complex Trauma Workbook.

In therapy Father Dan has taken responsibility for his mistakes and he has grown much in our time together. He takes criticism seriously and has accepted my feedback, which has encouraged and challenged him to be candid regarding his premarital relationship with his current spouse. We have also worked on boundaries, self-care, parenting and self-esteem issues. Due to his diagnosis of GAD, his primary clinical symptoms have included excessive worry, rumination/perseveration, tension, insomnia, people pleasing, perfectionism and fatigue. I would also note that Father Dan is ego dystonic, and experiences anguish over areas of his life that he believes need improvement. He has been honest with himself about areas of growth and has been quite open and vulnerable in therapy as he has sincerely worked to not repeat any problematic past behaviors. I have come to trust that his growth will continue in significant ways.

As stated above, I do see that Father Dan has been damaged by the church process over this time we have been in therapy together, especially by the publication of ad hominem and uninvestigated allegations, and by the long period of uncertainty. I urge the Church to review their process, especially the Title IV process, to ensure that a fair process for all parties takes place in the future.

I experience Father Dan as authentically working to be a better Priest. He has consistently worked to right any wrongs, to improve his understanding of both personal and family systems dynamics and to be both a better Priest and a better human being. He has a plethora of talent for ministry and he learned much about himself and worked consistently to improve himself in time with me, and I encourage you to be fair and forthright in your deliberations.

Sincerely,

Rev. Robert W. Ahern, Jr. Ph.D., LISW-S



EXHIBIT “4”

From: Joseph <frjosephgingrich@gmail.com>
Sent: Tuesday, September 23, 2025 11:16 AM
To: Deborah R. Stambaugh <dstambaugh@wispearl.com>
Cc: Daniel McClain <dwmccclain@icloud.com>
Subject: Hearing Panel

Dear Hearing Panel,

By way of introduction, I am Rev. Joseph Gingrich. A priest of the Greek Orthodox Church. Since the beginning of the first Title IV, I have been a confidant, friend, and clergy support person to Fr. Dan. As a priest who has ministered to Fr. Dan, I want you to know that I am writing to you with his consent.

Fr. Dan and I met in 2021 and began a friendship. We were both priests in the same city, and his parish was in the neighborhood where I lived. In April of 2022, Fr. Dan called me, stating that he had nowhere to live due to allegations that were made against him, where there was never a finding of fact. From April of 2022 to August of 2022, not only did Fr. Dan live with me and my son, but his eldest son, Henry, moved in with us full-time, and his other sons would regularly come to our home as part of Fr. Dan's shared parenting time with his boys. As such, I know the McClains well.

Having lived with Fr. Dan, I never once saw him intoxicated. I never once saw him lose control of his emotions in a way that would be deemed threatening. I do not believe Fr. Dan is a narcissist. I know Fr. Dan to be someone who cares deeply for others.

As his clergy support person, I witnessed and lived with a broken clergy family in crisis. The Episcopal Church in the Diocese of Southern Ohio offered him and his boys no pastoral support, to my knowledge. Throughout this entire difficulty, Fr. Dan and his eldest have reached out to me. Henry is finally beginning to go to church again. I had a conversation with an Anglican priest in the same town as Henry's college. Henry had given permission for me to reach out to the priest in his area after one of our conversations. Henry has been hurt and continues to hurt. When Fr. Dan lived with me, he had an episode of stress-induced vertigo, which required a life squad and hospitalization. Fr. Dan has been, and continues to be, traumatized by the very public nature of this Title IV. While I believe and know Fr. Dan to be a good man, even if all the hearsay and allegations were hypothetically true, the Episcopal Church is still required to minister to Fr. Dan and his boys. This is what the Church does. As Christians, we don't abandon our own when they are down. Like St. Simon, we help them pick up their Cross, and we walk with them.

As Fr. Dan's clergy support person, I have come to understand a bit about Title IV. This being said, I confess I am no expert and fully open to correction if I am wrong. It is my understanding that the Episcopal Diocese of Southern Ohio has violated canons three times in its pursuit to have Fr. Dan defrocked. 1) The Church Attorney in this matter and the Chancellor are from the same law firm. This is a conflict of interest. 2) The diocese simultaneously took Title III action against Fr. Dan in the midst of a Title IV. This is forbidden. 3) In their rebuttal for the Motion for Summary Judgment, they referenced matters from a previous Title IV, which was investigated and dismissed. This is double jeopardy. As someone who has discussed this at length with Fr. Dan, I am concerned that Fr. Dan is not being treated fairly by them.

It is my understanding from Fr. Dan that the diocese has agreed to Summary Judgment concerning adultery. Know that Fr. Dan is now married to this person. She is the love of his life and an exceptional bonus mother to all the McClain boys. Fr. Dan did not begin to date her until roughly a year into a three-year-long acrimonious divorce. While adultery might technically be true, it is certainly not within the spirit of the canons, and it is certainly not what the Episcopal Church is known for when it comes to alternative forms of intimate relationships. Fr. Dan's wife was never a parishioner of his, and she has never been an Episcopalian.

Please treat Fr. Dan fairly. Do the work of God's justice in this matter soberly and with the hoped-for healing of everyone involved.

Sincerely in Christ,

Joseph Gingrich



To Whom It May Concern,

My name is Fr. Jason Prati, and I have the privilege of serving as the Rector of All Saints Episcopal Church in New Albany, Ohio since 2014. It is with deep respect and genuine affection that I offer this character reference for Fr. Dan McClain, someone I have come to know not only as a respected colleague in ministry, but as a close friend. I was not contacted by the diocesan attorney or investigator in their investigation with Fr. Dan.

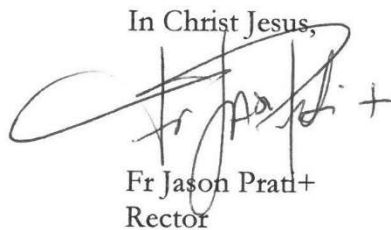
Over the past several years, I've had the opportunity to walk alongside Dan through both professional collaboration and personal friendship. What stands out most to me is Dan's love—for his staff, his parishioners, his friends, and above all, his wife Erin and family. His love and commitment to his children and their well-being are evident in every conversation we've shared. He is a present and intentional father, consistently placing the needs of his family at the center of his life and ministry.

Dan is a man of depth—intellectually, spiritually, and emotionally. He possesses a rare ability to listen with empathy, to counsel with wisdom, and to act with integrity. Time and again, I've witnessed him approach people with care and concern, offering support in times of difficulty and celebrating with them in times of joy.

Our friendship has grown through many theological and personal conversations, each one marked by Dan's sincerity, insight, and humility. He is someone I trust—honest, grounded, and dependable. When I have needed support or perspective, Dan has been there without hesitation, offering his presence with quiet strength.

In every aspect of his life—from his professional ministry to his role as a father and friend—Dan models a Christ-like compassion and commitment to others. His character is one of deep kindness, steady faith, and unwavering love.

Please feel free to reach out to me directly at frjason@allsaintsnewalbany.org or on my personal cell at 740-391-1064 if you would like to speak further.

In Christ Jesus,

Fr Jason Prati+
Rector

All Saints Episcopal Church
PO Box 421, New Albany, Ohio 43054

EXHIBIT “5”

Title IV Complaint

The Right Reverend Wayne Smith

Complainant: Attorney Deborah R. Stambaugh

Injured Party: The Rev. Daniel W. McClain

Via email to: tousley@episcopalchurch.org

August 6, 2022

INTRODUCTION

I am a licensed attorney studied in the clergy discipline canons of The Episcopal Church. I served as an Intake Officer, and an Investigator before the Diocesan Convention of the Episcopal Diocese of Pennsylvania elected me as their Church Attorney. I am known to pursue deposition when investigated findings warrant such outcome. In my Diocese I provide training for new Intake Officers, Investigators, and Advisors.

My baptismal promise to respect the dignity of every human being is a guiding light for my actions towards all others. As a confirmed Episcopalian and a clergy spouse I care about clergy integrity and wellness. My heart is oriented towards safeguarding vulnerable people. Protecting the vulnerable within the Church can be done in a manner that honors and respects our clergy. This work acknowledges Ephesians 4:11 -- Christ “gave” to the Church “some” to be pastors.

This complaint is made with the foregoing experiences and intentions in mind. I represent the Rev. Dr. Daniel McClain in Title IV proceedings in the Diocese of Southern Ohio.¹ With Fr. McClain’s consent, I make this complaint against the Right Reverend Wayne Smith regarding how Bishop Smith has handled the allegations against Fr. McClain.

Bishop Smith (1) abdicated his pastoral responsibilities to Father McClain; (2) predetermined the guilt of a Respondent in violation of Canon IV.19.Sec.16. and acted in accordance with that predetermination; (3) abused his pastoral authority and compromised his neutrality by issuing a public statement about a Title IV investigation before conducting the investigation; (4) indirectly or directly influenced or coerced participants in the Title IV process by (i) paying attorney fees to prop up a civil protective order that was based on false testimony; (ii) paying for the Complainant’s child custody dispute in which she seeks sole custody of the Respondent’s children; and (iii) using financial pressure to attempt to coerce the Respondent to enter an Accord; and (5) has not followed the procedures of the canons he purports to enforce.

¹ Father McClain asked me to represent him after he was told by his Bishop, prior to an Investigation, that he needed to hire an attorney.

WITNESSES

1. The Reverend John (Jack) F. Koepke, III (jfkoepkeiii@gmail.com)

Fr. Koepke is an Advisor to Fr. McClain and attended two meetings with Bishop Smith. He is aware that Bishop Smith predetermined guilt before an investigation and was a witness to coercive language used by the Bishop.

2. The Reverend Lynn Carter--Edmands (cartered@sbcglobal.net)

Mtr. Carter--Edmands stepped in as an advisor to Fr. McClain when Bishop Smith required Fr. McClain to attend a meeting while Fr. McClain's Advisor was out of the country and has remained Fr. McClain's second Advisor. She is aware of Bishop Smith's predetermination of guilt prior to an investigation and was a witness to coercive language used by the Bishop.

3. The Reverend Doctor Daniel W. McClain (c/o dstambaugh@wispearl.com)

Fr. McClain is a witness to all fact statements discussed herein.

4. Attorney Deborah Stambaugh (dstambaugh@wispearl.com)

The standard of care and respect provided by Bishop Smith to the subject clergy person is significantly below the standard of care that clergy should receive in clergy accountability proceedings in The Episcopal Church. Even guilty people deserve to be treated better than Fr. McClain has been treated. Bishop Smith violated several Title IV canons, as discussed in greater detail below.

SUMMARY OF RELEVANT HISTORY FROM THE UNDERLYING MATTER

1. While I firmly believe that all charges in the underlying matter will be dismissed if Fr. McClain is given a fair hearing, the question of the merits of those charges is not relevant to whether Bishop Smith has conducted himself appropriately.
2. The underlying Title IV matter involves a domestic dispute and fetid divorce proceedings funded by Bishop Wayne Smith. Due to false testimony given by Mrs. McClain under oath in an *ex parte* hearing at which Fr. McClain's counsel had no opportunity to cross examine her or put on his own testimony, a civil protective order (CPO) was issued.
3. Initially, Fr. McClain was completely separated from his four sons for four weeks. During those four weeks, the McClain children were told by their mother that their father

had the right to call them, but that he chose not to do so in order to make them upset at her, which was untrue.

4. After visiting his father and learning that his mother had deceived him, the oldest child ran away from home, and declared that he would petition for emancipation if he was not allowed to stay with his father.
5. For nearly four months Fr. McClain has been unable to enter his home to retrieve his personal possessions. He has only his clothes.
6. Because of the manner in which the Diocese handled the attenuated Title IV complaint, information painting Fr. McClain in a falsely negative light has been spread to the Parish and published in local and online newspapers.
7. If he had listened to his priest, Bishop Smith would have learned that his priest has been through a terrible ordeal. The priest stretched himself to the maximum extent possible, giving of his time, energy and finances to love, support, and cherish his wife even though she adopts unconventional beliefs. When Fr. McClain could stretch no further and spend no more, and after the McClain family had a very difficult Holy Week, his wife ended their marriage in the most terrible way possible.
8. A summary of some events that transpired in the McClain family over the last two years follows:
 - a. In 2020, Fr. McClain moved his wife and four sons from Virginia to Dayton, Ohio where he started a new position as priest in charge at St. Paul's Dayton (Parish), in the Diocese of Southern Ohio.
 - b. There had not been consistent leadership at the Parish for 10 years. Fr. McClain oversaw a five-year Strategic Plan with Strategic Leadership Consultants;

restarted all committees after the COVID hiatus; launched live-streaming outreach; restarted youth group and children's ministry; re-instituted the Mutual Ministry Review process, which had not taken place for 12 years; and launched a seminarian-internship program, for which the Parish was awarded a two-year grant for a seminarian education program. He also responded to criticism from parishioners and demonstrated willingness to modify his leadership practices when appropriate to keep peace.

- c. In the Fall of 2020, Mrs. McClain developed the belief that sars-cov-2 is not what is causing people to get sick. She believes that Bill Gates, the DAVOS group, and the World Economic Forum intentionally released sars-cov-2 to facilitate the roll-out of a the new 5G network and that the Church (including Fr. McClain) was complicit in their conspiracy by requiring people to wear masks. She believes that masks are not helpful, but instead are dangerous.
- d. Father McClain tried to maintain the privacy of Mrs. McClain's beliefs until she posted them to her Instagram account, where she was followed by several parishioners.
- e. Fr. McClain would have long days at the Parish upholding the COVID protocols that were developed before his arrival, and then come home to a wife who intensely scrutinized him for participating in what she called a conspiracy.
- f. The Parish responded negatively to Mrs. McClain's public opposition to masks, and Fr. McClain had to inform people that he did not agree with her. At a special Vestry meeting with Canon Johanssen, Spencer Izor and Joseph Schenk, the

Vestry expressed their frustration with Mrs. McClain's views, stating "the problem isn't you Dan, it's your wife."

- g. This was divisive for the parish and for the McClain family. Fr. McClain felt isolated, and he also felt as though he was standing between the Diocese, the Parish, and his wife.
- h. In the summer of 2021, Mrs. McClain developed the belief that she is hypersensitive to electromagnetic frequency (e.g. Wi-Fi, Bluetooth, and cellular transmission).
- i. Fr. McClain was dubious about this diagnosis but did his best to support his wife by making financial and physical modifications to their lives and home.
- j. Again, Fr. McClain tried to keep these beliefs private and shared Mrs. McClain's situation with only a few close people.
- k. Mrs. McClain would shut off most of the circuits in the house, which would be dark starting at dusk. The family used camping lanterns or flashlights to light the house after dark.
- l. Mrs. McClain required her family to shut off their cell phones when they were in the car with her.
- m. With Fr. McClain's consent, Mrs. McClain purchased a cabin "off grid," and Fr. McClain cashed in retirement savings from pre-clergy employment and used a portion of that for a down payment on a cabin.² Mrs. McClain spent a lot of time at the cabin, sometimes alone, and sometimes with the three younger McClain boys.

² A significant amount of this was applied to the family's revolving credit lines.

- n. Mrs. McClain developed the opinion that the Wi-Fi at the Parish was harmful to her and after that she limited her time there.
- o. She hired a “building biologist”³ to inspect the McClain home for “dirty electricity.” He used electric meters and an old radio shack style AM radio to demonstrate electrical problems with the house.
- p. The “building biologist” convinced Mrs. McClain that Fr. McClain’s hearing aid was harmful to her health. She asked him to sleep with his hearing aid and cell phone in a different room in the house, and he lovingly consented.
- q. The “building biologist” told Mrs. McClain that the smart reader on the electric utility box was emitting “radioactivity” and that it was making her sick. After an unsuccessful attempt to have the utility company replace the smart meter with an older style meter, she consulted an attorney *pro bono*, who said her best option was to buy a different house in a different neighborhood that did not have smart meters.
- r. Fr. McClain consented to the move. On March 5, 2022, he allowed his wife to sell their house, and buy a different house on the same day.
- s. The first thing Mrs. McClain did after moving to the new house was put locks on the electrical meters. Several days later, around 8:00 am, Fr. McClain received a call from an electric company technician who was at the front door of their home with a complaint about the locked meter.
- t. The McClain family went into a lot of debt preparing the prior home for sale and moving into the new home. In addition, it was a lot of physical work to move their family, including building a new chicken coop, and running ethernet cables

³ Building biology is not a licensed trade.

throughout the house so that Mrs. McClain would not complain about Wi-Fi making her itchy or causing other ailments.

- u. Mrs. McClain developed patterns of being withdrawn from her husband, staying up late to work on projects, and spending long hours on the phone with her chiropractor and naturopath, who believes Wi-Fi is demonic.
 - v. Mrs. McClain believes, and during Holy Week of 2022 informed her husband, that having intercourse after he drinks beer causes her to have a yeast infection.
9. By the time Holy Week of 2022 came around, the house was still full of boxes, and the family had just gone through two weeks of all four children being sick with head colds and stomach bugs. The family was exhausted.
10. During Holy Week, Fr. McClain and Mrs. McClain had several conversations about their relationship, and he suggested to his wife that they should go to grief counseling as a couple. He told her that if she wanted him to, he would stay somewhere else to keep the couple from having disagreements until they could get counseling.
11. Mrs. McClain had different plans. On April 19, 2022 she obtained and served Fr. McClain with an *ex parte* civil protective order, which prevented him from entering their marital home or contacting her or the children.⁴ The CPO gave her an early advantage in her divorce as there were no negotiations about who would live in the marital home, have possession of the primary vehicle, and custody of the children while the divorce was litigated/negotiated.
12. Fr. McClain did not have notice of the *ex parte* CPO hearing. He did not have an opportunity to respond and defend himself. He did not have an opportunity to cross-

⁴ Local rules of court require a full due process hearing on the *ex parte* civil protective order to be held within one week. Due to an understaffed judiciary, the hearing will not be held until August 9, 2022.

examine the accuser. The modicum of due process he received at this hearing was confidentiality.

13. During the hearing to obtain the civil protective order, Mrs. McClain testified that her husband does not strike her and does not threaten to strike her. She first testified that his abuse was “emotional, psychological, like physical intimidation . . .” After the magistrate advised Mrs. McClain three or four times there had to be some sort of violence, Mrs. McClain perjured herself stating, “Friday he locked me in a room and he wouldn’t let me out of the room.”
14. It is not possible to lock a person in a room in the McClain household. The doors lock only from the inside. When Mrs. McClain repeated her story to the Intake Officer for the Diocese of Southern Ohio, she worded this differently, stating that on Good Friday “He blocked me in the door jam.” This is also not true.
15. The couple did have a difficult conversation on Good Friday after Fr. McClain did a full day of services, made dinner for his family in between, and then picked up three of his children at a game store around 10:00 pm before coming home to his wife. She was in the bathroom brushing her teeth. Instead of entering the bathroom, he did stand in the doorway, which was open, and spoke to her. When she indicated with her body language that she was ready to leave the room, they continued the conversation in their bedroom. They sat in different parts of the room. Children came in and out of the room several times during the conversation.
16. Mrs. McClain has not allowed Fr. McClain to collect personal items from the marital home. To this day, he has nothing but his clothes.
17. In addition to alleging that he blocked egress, Mrs. McClain made sexual allegations.

18. Mrs. McClain accused her husband of “20 years of abuse” and “rape,” but proceeds to say that “the most traumatic experience was in March,” and that “It was rape. I wasn’t not [sic] awake for consent; he did not ask me.”
19. Taken at a factual and non-hyperbolic level, these words mean that the worst thing Fr. McClain is accused of is initiating sex with his wife while she was asleep. This did not happen.
20. Fr. McClain has not ever engaged in a sexual act with his wife in which she did not consent. His wife did not bring up issues with their sexual relationship in the two times they had couples counseling (Fall 2005 and Fall 2016).
21. For 14 years Fr. McClain has interacted with students and parishioners in academic and ministerial settings. For several years before that he was a public-school teacher in Philadelphia. He has not ever considered being unfaithful to his wife. The police have never been called to his home to break up a domestic dispute. He has not ever struck his wife or his children. His wife felt plenty confident to beat on the door to their bedroom when at one point during Holy Week, he became exhausted and locked himself in the bedroom and tried to rest.
22. Bishop Smith’s response to the Title IV allegations against Fr. McClain have been reactive and out of proportion to the allegations taken on their face.

COMPLAINT 1. ABDICATION OF RESPONSIBILITY TO PROVIDE PASTORAL CARE
(Ordination Promise, Canon IV.4(c))

23. On May 11, 2022, Bishop Smith met in person with Fr. McClain, Fr. Koepke, and Canon Michael Spencer.
24. During that meeting Bishop Smith cross-examined Fr. McClain for about thirty minutes, and then told him that he did not believe him, but that he believes Mrs. McClain.

25. Father McClain was experiencing the worst heartbreak of his life at the end of a 20 year marriage to a wife that he truly loved after making significant personal sacrifices to care for her. The care he received from his pastor was, “**I do not believe you. . .**”
26. To the extent Bishop Smith provided further pastoral care to Fr. McClain, that pastoral care was limited to asking Father McClain whether he was suicidal.
27. Bishop Smith did not appoint another person to provide pastoral care to Fr. McClain.
28. The foregoing constitutes a violation of Bishop Smith’s promise at his ordination to “. . . undertake to be a faithful pastor to **all** whom you are called to serve.” (BCP 532)(emphasis added).

COMPLAINT 2. EXPRESSION OF BIAS AND PREDETERMINATION OF GUILT
(Canons IV.19.14 and 16)

29. During the May 11, 2022, meeting, which preceded any Title IV investigation, Bishop Smith told Fr. McClain that he planned to depose Fr. McClain, and that Fr. McClain should agree to deposition or a lengthy suspension to save himself and his family from the financial and emotional toll of Title IV proceedings, and from the attenuated public ordeal.
30. On information and belief, Bishop Smith has extrapolated an opinion of guilt from the fact that there were folks at the Parish, where there had been inconsistent leadership for 10 years, who had complained about changes made by Fr. McClain, who arrived at the Parish during a pandemic.
31. At subsequent meetings on May 11, 2022 and May 24, 2022 which also pre-dated any investigation, Bishop Smith told Fr. McClain, “Given my druthers at this juncture it would be deposition. We can talk about suspension,” and “It’s time to start a broader imagination about what your vocation is in terms of secular employment.”

32. In attempting to negotiate an Accord in which Fr. McClain stipulated to deposition or a lengthy suspension, Bishop Smith threatened, “Any corners of your life that you don’t want touched, they may be touched.”
33. These statements express a predetermination of guilt in violation of Canon IV.19.Sec.16.
34. Although it is not material to the instant matter, it should be noted that Bishop Smith’s predetermination of guilt was an incorrect determination.

**COMPLAINT 3. PREMATURE AND INCORRECT PUBLIC STATEMENTS
CONSTITUTE ABUSE OF PASTORAL AUTHORITY
(Canon IV.8.4)**

35. On May 11, 2022, Bishop Smith sent a letter to the entire Parish, stating in part,
- I received a formal complaint against the Rev. Daniel W. McClain. . . . The Complaint comes from his spouse, and it includes allegations of **domestic abuse**. . . In light of a **restraining order issued by the courts** and **upon information satisfactory to me**, I have directed that he not have contact with his spouse, pending resolution of the canonical complaint . . .
36. Bishop Smith’s letter was shared with the media.
37. The media reported a statement by Canon Johanssen: “the Diocese of Southern Ohio is cooperating fully with law enforcement.”
38. These statements unfairly paint Fr. McClain in a false light. To the best of our knowledge, law enforcement is not doing anything with which Canon Johanssen could cooperate.
39. Moreover, there was not a “restraining order.” To use the Civil Protective Order (CPO) as authoritative on the question of whether there has been domestic abuse is unfair and wrong. The CPO is not evidence of anything except that an allegation has been made. CPOs are granted almost systematically upon request by alleged victims.

40. The CPO granted to Mrs. McClain was entered on the basis of false testimony alleging an occurrence that physically could not have happened.
41. As discussed above, after being advised three or four times that she needed to allege some type of violence, Mrs. McClain perjured herself stating, “Friday he locked me into a room and he wouldn’t let me out of the room.” It is not possible in the McClain residence to lock a person in a room. The doors in their house lock only from the inside. Father McClain did not ever lock his wife in a room.
42. Father McClain had no notice of the CPO hearing. He was not given an opportunity to respond to the allegations. He could not cross examine the witness.
43. **The modicum of due process Father McClain received in that hearing was confidentiality. Confidentiality was destroyed by his pastor.**
44. Title IV canons give bishops authority to disclose facts relevant to Title IV proceedings when pastorally appropriate. Bishop Smith’s use of his pastoral authority in this instance was abusive. His premature disclosure of the allegations consolidated his influence over the Parish, and possibly painted him as a “me too Bishop,” but did nothing to benefit the Parish, and was extremely detrimental to the subject clergy person’s mental and emotional well-being and employment prospects.

**COMPLAINT 4. COERCION OR INFLUENCE
OVER TITLE IV WITNESSES
(Canon IV.19.Sec 11)**

45. The following describe the manners in which Bishop Smith has directly or indirectly coerced or influenced the Title IV process and/or witnesses.

**(i) Payment of Legal Fees to Prop Up a CPO that the
Diocese Knows is Based on Untrue Allegations**

46. It is Father McClain's understanding from communications with Mrs. McClain's divorce attorney that Bishop Smith has funded Mrs. McClain's divorce attorney.
47. This attorney has negotiated to roll the protections of the CPO into a divorce agreement, and absent a stipulation, plans to appear in court on August 9, 2022 and argue to make the CPO permanent.
48. In other words, the Diocese is paying an attorney to uphold the CPO even though the Diocese has a copy of the original CPO hearing transcript and is aware the CPO was entered on the basis of testimony that (as discussed above) cannot be true.

(ii) Payment of Legal Fees for Mrs. McClain's Child Custody Dispute

49. As discussed above, Bishop Smith is paying Mrs. McClain's divorce attorney.
50. During the time that there was consideration of a change of jurisdiction to the jurisdiction where Fr. McClain is canonically resident, Mrs. McClain made a supplemental complaint against her husband, and alleged she was concerned that the other diocese would not handle this matter properly. While none of the new allegations carry water, it should be noted that Mrs. McClain's opposition was likely motivated by a financial concern that she would lose funding for her divorce attorney if a Bishop who was familiar with her handled this matter.
51. **Bishop Smith's involvement in the child custody dispute is the opposite of protecting vulnerable people.**
52. Mrs. McClain's divorce attorney, funded by Bishop Smith, is negotiating for complete sole custody of the three younger McClain boys.

53. The McClain children need their father. He is an involved father who prepares family meals (even on Good Friday), rides bicycles with his sons, takes them hiking, and enjoys their company. After being reunited with their father for the first time, all of the boys chose to put their sleeping bags in his room to be as close to him as possible, even though another room was made available to them.
54. One of the boys has taken on his mother's belief that Wi-Fi is harmful to his health, and whenever he visits his father's apartment, brings oral supplements to counter the effects of Wi-Fi.
55. Mrs. McClain is antagonistic towards regular medical doctors. She claims to have yeast infections but believes that the proper treatment is for her husband to stop drinking beer.⁵ She will not go see a regular doctor. If one of her boys becomes ill, it is unlikely they will receive appropriate medical care under her custody.
56. Historically, the boys have been homeschooled by their mother. It is unlikely Mrs. McClain will be able to both home-school the boys and take on the job she will need to fund her separate household. She is not able to accept this reality. Currently, she holds out in the divorce proceedings that she plans to continue homeschooling the three younger boys.⁶
57. In addition to being harmful to the children, the Bishop's involvement in the child custody dispute amounts to paying off a witness to help her continue her false testimony. This is improper influence of a witness in violation of Canon IV.19.Sec 11 ("No person subject to the authority of the Church may attempt to coerce or improperly influence, directly or **indirectly** . . . any other person involved in such proceedings.")

⁵ Fr. McClain formerly drank one beer per day. He does not have an alcohol problem.

⁶ The oldest McClain boy insisted on going to regular high school, and has not been homeschooled by his mother since 2021.

(iii) Financial Coercion of the Respondent Priest

58. During meetings on May 11, and 24, 2022, Bishop Smith instructed the Respondent Priest that he needed to hire an attorney, and threatened the priest that refusing to agree to deposition or a lengthy suspension would be expensive due to the cost of attorneys.
59. In my experience, it is odd to advise a priest to get an attorney before the Reference Panel Investigation has begun. For that reason, I agreed to become involved.
60. The Bishop's advice that the Respondent hire counsel was unduly coercive and manipulative.

COMPLAINT 5. DISREGARD FOR TITLE IV PROCEDURE

61. Bishop Smith and the Diocese of Southern Ohio have not upheld the canons they purport to enforce. This has caused unnecessary stress for the Respondent.
62. Initially the Diocese of Southern Ohio failed to look at whether they had jurisdiction over this priest who is canonically resident in another diocese. Bishop Smith had already taken public action against Fr. McClain before the Bishop where Fr. McClain is canonically resident had an opportunity to consider the allegations.
63. The Intake Report, which the Respondent has received a copy of, does not give consideration to Title IV time limitations, and includes allegations about times prior to the Respondent being ordained, and about a "twenty year marriage."
64. The Respondent has been whipsawed about whether Bishop Smith required him to receive addiction "treatment." The Canon to the Ordinary threatened that the Bishop would enter a pastoral order if the Respondent did not sign himself up for "treatment."

Meanwhile, the Chancellor stated in writing that Bishop Smith had not instructed Fr. McClain to receive “treatment.” This happened because the Canon to the Ordinary did not honor the entry of appearance by counsel. Fr. McClain does not need addiction treatment.

65. Our clergy deserve to be treated with a greater level of care and respect.

WHEREFORE, I respectfully request:

1. Appropriate pastoral care should be provided for Fr. McClain.
2. Having acknowledged his bias against Fr. McClain, Bishop Smith should recuse himself from Fr. McClain’s Title IV proceedings, and the letter of suspension should be lifted.
3. A different Bishop should be appointed to oversee the relationship between Fr. McClain and his Parish.
4. Bishop Smith and/or the Diocese of Southern Ohio should withdraw financial support for Mrs. McClain’s divorce attorney, especially the child custody dispute.
5. The Diocese of Southern Ohio should pay a media consultant to take down all negative media resulting from the premature publication of negative information about Fr. McClain, which has painted him in a false light.
6. A letter should be sent to the Parish notifying the Parish that a civil protective order does not constitute a finding of abuse, and that Bishop Smith’s finding of abuse was incorrect.
7. Bishop Wayne Smith should pay attorney fees resulting from his attempt to bully Fr. McClain by telling him that he needed an attorney to go through the Title IV process in the Diocese of Southern Ohio.
8. Fr. McClain reserves all civil legal remedies to which he is entitled as a result of the statements by Bishop Smith and other Diocesan officials, which unfairly paint him in a

negative light, and which will be damaging to his relationship to his Parish or to other possible future employers.

/s/ Deborah R Stambaugh

Deborah R. Stambaugh
460 Norristown Road, Suite 110
Blue Bell, PA 19422
Office: (610) 825-8400
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dstambaugh@wispearl.com

EXHIBIT “6”

From: Lynn Carter-Edmands <cartered@sbcglobal.net>

Date: April 12, 2024 at 5:10:53 PM EDT

To: Nedi Rivera <nedirivera@gmail.com>, Bishop Kristin White <kwhite@diosohio.org>

Subject: Fr. Dan McClain proposed terms of accord

Dear Bishop Nedi,

Thank you for your email yesterday and for sharing where you are in response to my suggestion regarding St. Paul's. And thank you for the time you spent with me last week listening to my thoughts about it. As you know, I have spent a lot of time with Fr. McClain as Advisor to him according to the canons. Please know that Fr. McClain and his lawyer are ready and able to proceed to a hearing panel if that is what he needs to do to clear his name. However, in the interest of moving this matter along, he would like to make this further attempt to negotiate an accord.

This has been a long two years. There have been missed opportunities, to say the least. There is the best future for the parish, the diocese, and Fr. McClain and his family to consider. Many people have been hurt in this situation, including Fr. McClain and his family. There are key people of St. Paul's you say are afraid of Fr. McClain and who would not participate in any process that will include Fr. McClain, and others who will feel pressured to participate and yet due to past hurt will not return to St. Paul's if Fr. McClain remains. Acknowledging the huge amount of healing to be done, and that Fr. McClain will not be able to be part of that healing process with the congregation, the proposed terms of accord address the opportunity for Fr. McClain to begin healing from how this Title IV process with the public airing of opinion by the complainant, as well as from how the complaint of 2022 was handled. This is a matter of justice, and I would ask for compassion to allow all persons involved to move forward into their best future.

The attached consultation report shows that vestry members (including Bruce Huntsbarger, Carol Holm, Judy Pritchard, Joe Schenk, Spencer Izor, and Grey Jones) had an opportunity to participate in a survey that culminated in a Vestry Senior Leadership Consultation Situational Analysis Report of April 2022; no one at the time complained that Fr. McClain was unsafe. I just learned about this report or I would have mentioned it to you sooner. It adds

another dimension to the possibilities for outcome here. Folks who had concerns in spring of 2022 were able to voice those concerns as revealed in the consultation report and, while they did raise their concerns, they did not share issues of fear, being scared of, or being threatened by Fr. McClain. I would be happy to discuss this with you but prefer not to do so here in such a sterile method of communication. The interesting shift from some parishioners' criticisms of Fr. McClain to feelings of danger, and the need for Fr. McClain to have time for healing in his own right, inform the following proposed terms of accord:

These are the terms that Fr. McClain will agree to.

1. The Diocese of Southern Ohio is trying to hold a priest accountable and should also hold itself accountable for humiliating one of its priests by publication of too much (and sometimes incorrect and/or misleading) information. The Notice of Accord should include a statement that following investigation some allegations were shown to be untrue, and others were not ever substantiated or proved. It should also state that in a blind survey conducted in the parish in the year 2022, no one made any suggestion that the priest was unsafe. Fr. McClain is accepting responsibility only for having a sexual relationship with a person other than his spouse after nearly a year of difficult divorce proceedings.
2. As should be the case with any final decision on any Title IV matter, the allegations complained of should not ever be revisited in any subsequent Title IV. (Canon 19.10.13) This must be acknowledged in any agreement to discipline.
3. Fr. McClain will resign from St. Paul's.
4. Fr. McClain will receive financial compensation from the Diocese in the amount of his regular salary (including health and dental insurance for him and his entire family) for one year following the date of the accord.
5. The Bishop's Office will issue letters dimissory to any diocese where Fr. McClain is offered a position and will state that he is a priest in good standing.
6. There will be no suspension, other than the time Fr. McClain has already been placed on Administrative Leave in 2022 and in 2024. Alternatively, the Diocese will pay Fr. McClain's regular salary for the entire period of any future suspension and for one year following the end of that suspension.
7. Fr. McClain may communicate with the leaders of St. Paul's for the purpose of obtaining letters of recommendation.
8. The Notice of Accord will state that the canon violated was Canon IV.4.1(h)(9). The notice will be drafted in advance of the Agreement of Discipline, and Counsel for the Respondent will participate in drafting the Notice of Accord, and it will be an exhibit to the agreement to discipline.
9. There is no non-disclosure agreement by Fr. McClain or by the Diocese. This is an ecclesiastical agreement and does not have any impact on any secular legal remedies that may be available to the priest at equity or law.
10. The Diocese will announce using the same method of communication used to publicize the charges against him that Fr. McClain is a priest in good standing, that the matter is resolved, will remove all public record of this matter from the Diocesan website and submit a *reclama* to any religious and secular publication that have previously reported on the two Title IV actions refuting the Diocese's original accusations and actions against Fr. McClain.

Thank you for your consideration.

With every blessing,

Lynn

(The Rev'd) Lynn Carter-Edmands
4667 Wenham Park
Columbus, OH 43230
614.947.9748

EXHIBIT “7”

From: sjellcessor@gmail.com <sjellcessor@gmail.com>

Sent: Wednesday, May 1, 2024 5:45 PM

To: cartered@sbcglobal.net; Deborah R. Stambaugh <dstambaugh@wispearl.com>

Cc: 'Bavi Rivera' <nedirivera@gmail.com>; 'Joseph J. Dehner' <dehnerjoseph@gmail.com>; 'Bishop Kristin White' <kwhite@diosohio.org>

Subject: RE: Accord discussions

Dear Deb and Lynn,

I have now had a chance to review your email, Lynn, regarding possible accord terms and to discuss them with Bishop Rivera. The parties' respective mandatory disclosures have also now been exchanged, and I trust that you have had a chance to review the Church's disclosures. With that background, let me outline for you where I think that this matter sits at present and what I would feel comfortable recommending to Bishop Rivera as the basis for an accord.

You have both commented on the harm that you believe that Father McClain has suffered as a result of the Offenses charged against him in this matter. While I understand you may still dispute specifics, I hope that with the information provided in the mandatory disclosures you can appreciate that certain parishioners and members of the staff at St. Paul's feel strongly that Father McClain has caused hurt to many people and that he is not suited to serve as Rector there or elsewhere within the Church. Accordingly, at this time, my recommendation to the Bishop would be that any accord with Father McClain should include a resignation from the Ordained Ministry of the Church.

With regard to Father McClain's terms for reaching an accord and his alleged humiliation, it is worth noting that this Complaint originated and was publicized by a third party which the Diocese does not control and that the divorce proceedings in which Father McClain is involved are a matter of public record. As to the allegations in this matter, we believe that the investigation has established that they are not frivolous or lacking in corroboration. I will, therefore, not recommend to the Bishop that any language suggesting otherwise be part of an accord agreement.

That being said, there are conditions that I believe the Bishop would be willing to consider in an accord, including possible financial support for Father McClain and his family for a period of time. Obviously, in exchange for any monetary consideration, the Diocese would require that it and any others who participated in the investigation of this matter be guaranteed freedom from any "secular legal remedies" referred to in your list of demands, any church disciplinary complaints or claims of any kind, or any other retaliatory action.

I think that we can all agree that it would be for the benefit of all parties involved if a mutually acceptable accord could be reached to resolve this matter. To that end, we are willing to work with you to reach mutually acceptable language in the accord itself and in any letters of reference or public statements.

We look forward to hearing from you and to further discussions.

Regards,
Steve

Steven J. Ellcessor

Church Attorney, Diocese of Southern Ohio

(He/him/his)

Phone: 614.551.9170

Email: sjellcessor@gmail.com

From: sjellcessor@gmail.com <sjellcessor@gmail.com>

Sent: Saturday, April 20, 2024 11:34 AM

To: cartered@sbcglobal.net

Cc: 'Deborah R. Stambaugh' <dstambaugh@wispearl.com>; 'Bavi Rivera' <nedirivera@gmail.com>; Joseph J. Dehner <dehnerjoseph@gmail.com>; 'Bishop Kristin White' <kwhite@diosohio.org>

Subject: Accord discussions

Good morning, Lynn. Bishop Nedi has forwarded to me your email regarding possible accord terms. She asked me to express to you her appreciation for your email and your interest in trying to reach a mutually beneficial resolution of this matter. Given, though, that the accord negotiation process affects the interests of multiple parties, including Father Dan, St. Paul's, the complainant, affected parties, the Diocese, and the broader Church, she also has asked me, as Church Attorney in the matter, to serve as intermediary in working with you and Deb to discuss possible accord provisions.

As I review your email, I can see that there are several points in your list of terms that are worthy of further consideration and discussion. At the same time, however, there are several that, as Church Attorney, I think that I would have a hard time recommending from the perspective of the broader Church. But before I provide any substantive comment, let me get together with Bishop Nedi to discuss your offer and consider its provisions in detail. We will try to do that as soon as possible, and I will then get back to you with our thoughts and suggestions.

Best,
Steve

Steven J. Ellcessor

Church Attorney, Diocese of Southern Ohio

(He/him/his)

Phone: 614.551.9170

Email: sjellcessor@gmail.com

EXHIBIT “8”



Quality of Life, Work, Society

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St. Paul's Episcopal Church Vestry Senior Leadership Consultation Situation Analysis Report

April 12, 2022

Prepared by David Ramey, Consultant

Changing the trajectory of the future by creating consensus on vision and strategy.

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I. Overview

David Ramey of Strategic Leadership Associates is assisting St. Paul's Episcopal Church with a senior leadership consultation. The primary task of this consultation is "to facilitate resolution of senior leadership conflict concerning leadership and governance among the Vestry supported by a multi-year vision and strategy for the future of the church."

The key elements of this consultation include the following:

- **Interviews with all members of the Vestry (completed)**
- **Debriefing of the findings with Pastor (completed)**
- **Written situation analysis (completed)**
- **Debriefing of the situation with members of the Vestry**
- **Development of a short-term plan of action on leadership and governance with the Vestry**
- **Development of a long-term vision and strategy (strategic plan) for St. Paul's Episcopal Church**
- **Engagement of the congregation in evaluating and supporting the future vision and strategy of St. Paul's Episcopal Church**

This report will constitute the situation analysis for the Vestry leadership consultation. In order to develop this report, David Ramey, President of Strategic Leadership Associates, conducted interviews with all 12 members of the current Vestry of St. Paul's Episcopal Church. In addition, 5 members of the former Vestry were interviewed, and one additional clergy member also participated in the interviews. Participants were given the questions in advance to prepare for their interviews which lasted between 35 and 65 minutes per interview. All interviews were completed between February 16th and March 18th, 2022.

Following are the observations and findings of the situation analysis.

II. Strengths of St. Paul's Episcopal Church (Question 1)

When asked to identify the strengths of St. Paul's Episcopal Church, Vestry members, both current and past, identified a few themes in common with a high degree of consensus. These included:

- The fiscal strength of the congregation
- The beauty and maintenance of the church property and physical plant
- The worship and traditions of the congregation

When discussing the fiscal strength of the congregation, Vestry members most frequently mentioned the favorable balance sheet of St. Paul's Episcopal Church and the fact that it has no mortgage or debt associated with this asset. Many Vestry members mentioned the strength of the endowment in place and the core staff responsible for accounting were also noted.

When discussing the outstanding quality and beauty of the physical plant Vestry members were in consensus that the location, easy access, beauty, and maintenance of the physical plant were all extremely strong assets for the congregation.

Finally, when discussing the worship and traditions of the congregation, nearly all Vestry members found that the congregation had a core membership that was still loyal that was focused on worship, fellowship, and service. Many Vestry members mentioned the beauty of the worship services as well as the fellowship and services that had been part of the congregation history.

III. Weaknesses and Limitations of St. Paul's Episcopal Church (Question 2)

When asked to identify the weaknesses or limitations of St. Paul's Episcopal Church, most Vestry members most frequently mentioned:

- Decline in pledges for fiscal years 2020 and 2021
- The COVID pandemic and its impact on the ability of the congregation to gather for worship and church activities
- A decline in church membership
- Transitions in leadership
- Difficulties with the Priest in Charge

When discussing the financial weaknesses of St. Paul's Episcopal Church, many Vestry members mentioned a decline in pledges for 2020 and 2021 and the consequence for a weaker income statement with losses for fiscal year 2020 and 2021 in the range of tens of thousands of dollars for each of those fiscal years. It was surprising that a number of Vestry members do not seem to have an adequate understanding of the difference between a balance sheet and the income statement. While problems with the income statement, which are linked to membership decline, suggest operating losses, those annual operating losses are not at the point of eliminating a healthy balance sheet. While there are warning signals on the horizon, St. Paul's fiscal strength appears to be well in hand for now.

When discussing the COVID pandemic, many Vestry members mentioned that the pandemic significantly impacted the ability of parishioners to attend church and to participate in church activities. A number of church activities were suspended during the pandemic and the church did not necessarily follow the guidelines issued by the Episcopal Diocese of Cincinnati, but rather developed a sort of (do it your own) approach to the pandemic which proved to be unfortunate.

With regard to membership decline, many Vestry members believe that the congregation is declining in membership with many older and core members leaving the church. Some attribute this to the new Priest in Charge and his leadership. However, others acknowledge that declining membership actually began long before the Priest in Charge arrived. Still others believe that there are newer members in the congregation and the total congregation membership is relatively stable. There does not appear to be any substantial fact-based understanding of the current status of membership levels among the Vestry leadership.

Leadership transition: Nearly all Vestry members report that for over more than a 10-year period the congregation has experienced lots of change without a permanent pastor. There have been a number of approaches to pastoring the church during this period of time, but nearly all have resulted in very little stability for the congregation.

There are many reasons attributed to this constant sense of transitional leadership. This does, in part, explain why lay leaders of the congregation may have been overly assertive and possessive of their authority in the past in order to maintain the stability and the vitality of the congregation without a permanent pastor who has been named Rector for a long period of time.

Finally, some Vestry members believe that a number of misunderstandings and polarizing attitudes and experiences have weakened the strength and vitality of the congregation. Many characterized a sense of disenfranchisement among older, more core members of the congregation who may no longer be attending church while others believe that an influx of new congregation members is and will be bringing vitality.

There are a number of other lesser disagreements that have been identified as part of the weaknesses (i.e. incense, vestments, changes in staff), however these appear to be lost in a lack of a coherent vision for the future of the church which will be addressed later in the consultation.

IV. Ministry Areas in Need of Attention (Question 3)

When asked to identify those ministry areas that needed attention in the development of a strategic plan, most Vestry members most frequently mentioned:

- Membership growth
- Outreach and ministry development
- Financial development and growth in revenue

When asked to discuss the membership challenges of the congregation, once again Vestry members mentioned the COVID pandemic as impacting the ability of the congregation to gather. However, in looking ahead, Vestry members believe the congregation should make a substantial and sustained effort to retain and reengage members and bring new members into the church. This membership growth is perceived accurately to be a reflection of congregation health. In order to achieve that, Vestry members are well aware that ministries of welcome and hospitality need to be resumed.

When discussing the need for outreach and ministry, once again Vestry members mentioned the need for outreach to new members of the congregation and to reach back into the core members of the congregation and to reengage and retain some older members of the congregation who may have been lost and alienated for a variety of reasons including a new pastor, isolation due to the pandemic, weak communication and outreach to them, and diminishment of programs in recent years.

Consequently, evangelization and an outward focus to the growth of the congregation is sought by nearly all Vestry members. This includes a reinvigoration of youth education and children's programs, reestablishment of the worship committee, building a culture of collaboration, reestablishment of a parish life committee, and continued leadership of the Pastor and the religious and the faith formation ministries. It goes without saying that vital worship and engagement of the entire community in prayer and fellowship are key priorities.

Finally, growth in financial revenue is seen as critical to reversing past declines of an unfavorable income statement at St. Paul's Episcopal Church. Nearly all Vestry members agree that efforts need to be made deliberately to increase pledges to the congregation and increase the number of members and households giving to the future of St. Paul's Episcopal Church. Some have mentioned the need for a capital campaign.

V. Vestry Engagement with the Congregation (Questions 4-5)

When asked to evaluate how well the Vestry as a whole listens and responds to the concerns of the congregation, the feedback of Vestry members was exceedingly mixed and less than favorable. The Vestry does not appear to have many well-developed channels of communication and facilitation of the needs of the congregation. Most of the means of communication between the Vestry and members of the congregation are very informal and not institutionalized as a practice of the church. This appears to be a significant shortfall for the congregation. There is no formal collective outreach between the Vestry and members of the congregation. While Vestry members may talk to one another and their friends, there is not an obvious path for their communication with the congregation. The annual summer survey is perceived by many to be rather weak in implementation and limited in engaging congregation members. In a congregation the size of St. Paul's it is vital that the Vestry have a more comprehensive approach to communication, representation, and engagement of the congregation than it currently exhibits.

It is somewhat troubling to hear that some Vestry members may not attend church on a regular basis and many of the activities of the congregation as well. Nearly all members of the Vestry agree that a more substantial focused and structured approach to engaging the congregation would be important.

When asked to identify ways that the Vestry could improve upon its listening and response to the concerns of the congregation, Vestry members most frequently mentioned more structured listening sessions with formal formats to address initiatives and priorities of the church and engage congregation members in serious discussions.

Vestry members acknowledge that, once again, the COVID pandemic has diminished the ability to gather the congregation. However, it is observed that more structured and formal process to engage the congregation and coherent messages and discipline are important to come from the Vestry. It also seems important that members of the Vestry have more clarity and understanding on the rules and regulations governing the role of a Vestry in the Episcopal Church. Vestry members are somewhat concerned that they may not have an adequate grasp on the expectations of the Episcopal Church and what it means to be a member of the Vestry.

Vestry members acknowledge that they as a group need to place more emphasis on parish life and that part of their charge is to engage members of the congregation in parish life working alongside of and in partnership with the Pastor.

VI. Pastor Engagement with the Congregation (Questions 6-7)

When asked how well the Pastor (Priest in Charge) listens and responds to members and concerns of the congregation, the response of current and former Vestry members was exceedingly mixed. Some Vestry members believe that the Pastor (Priest in Charge) is both professional, pastoral, authentic, and prophetic. Some characterize him as respectful and having the ability to hear people and disagree with them. They characterize his leadership of worship as both personable and “wonderful”. Many consider the pastor to be a very gifted and talented man who is extremely well grounded in his theological perceptions and perspective.

Others, however, describe the Pastor and Priest in Charge in less than favorable terms. These characterizations include describing his leadership as dismissive, arrogant, combative, and at times manipulative. Some Vestry members believe that the Pastor does not “read the room well” and makes decisions in a unilateral fashion. This latter point however, is disputed by different versions or accounts of the same situation where some believe the Pastor has, in fact, consulted with the Vestry or other persons of interest in making key decisions while others perceive his leadership as single-minded and rather unilateral in approach.

Whatever may be the case in the past, going forward it is critical that both Pastor and Vestry focus on appropriate governance and leadership relationships consistent with the norms, standards, and practices of the Episcopal Church. It is also important that the Pastor exercise leadership that is emotionally intelligent and sensitive to the diverse needs of people in the community.

It is an observation of this consultant that there are also members of the congregation and the Vestry who have very sensitive ears when it comes to hearing unwelcome ideas or thoughts. This tendency to be easily offended, whether coming from the Pastor, the Vestry, or members of the congregation, suggests a culture that needs a more deeper grounding in the spirituality of Christianity, the ability to forgive, and the ability to reconcile and resolve differences in a less confrontational manner.

It would help if the Pastor paid attention to slowing the pace of change and spent more time listening to people both one-on-one and in groups to understand their perception. It is also critical that the Pastor and members of the Vestry understand the impact and consequences of how decisions will land upon the ears and the minds and the hearts of members of the congregation before those decisions are made. This is indeed a responsibility of leadership.

The prior polarized view of leadership of the Pastor (Priest in Charge) cannot be a situation that continues to be tolerated in the community. The must be resolved for the

congregation to move forward in a constructive manner. It will take a deliberate process of engaging members of the congregation individually, reestablishing formal groups and advisory bodies throughout the congregation to impact congregational life and a long-term vision and strategy for the future.

The Pastor (Priest in Charge) would do well to be sure and include members of the Vestry in key decisions of the congregation and to be sure that those decisions are presented as a consensus view of the Vestry before they are announced or implemented in congregation. These include decisions related to finance, worship, worship times, and the continuation or discontinuation of various programs of the congregation.

Confidential

VII. Vestry Engagement with the Pastor (Question 8-10)

The feedback received during this consultation presents “A Tale of Two Cities” between the current and the former Vestry. Former Vestry members, in general, describe their interactions with the Pastor (Priest in Charge) as adversarial and conflicted. They believe that his leadership has perpetuated dissent and argumentative approaches to change. Some indicate they find him defensive and not open to ideas other than his own. Newer members of the Vestry appear to have a more favorable view of the Pastor (Priest in Charge) and his engagement with members of the Vestry.

Whatever the past case may be, it is eminently clear that the Pastor and the Vestry must work together as allies to facilitate the spiritual and material growth of the congregation. As some have described, the Pastor and the Vestry need a “hard reset”. This would include established norms and procedures to reinstitute collegiality and to genuinely pray and socialize together and learn about the important priorities of leading the congregation together.

When asked to describe the desired attributes of a favorable Vestry and Pastor relationship, nearly all Vestry members noted the following:

- The spirit and practice of collaboration
- Strong and engaged communication
- Mutual respect

With respect to collaboration between the Pastor and the Vestry, Vestry members desire to see greater delegation, collaboration, and a willingness and readiness to move forward together. In this effort, Vestry members seek to find a shared enthusiasm for the religious mission of the congregation and the ability to accept the need for change in order for St. Paul’s Episcopal Church to move forward.

With respect to engaged communications, during the next several months St. Paul’s will be determining whether to fully call the “Pastor” as the “Rector” for the future of the congregation. Vestry members believe this will take a more formal process and the ability to lighten up and appreciate one another’s culture and perspective.

Beyond all the conflictual elements of the past, Vestry members seek a role with the Pastor where there are clear lines of communication and responsibility. There is need for a well-functioning leadership team in place with assigned roles and missions to be successful. There is also need for an environment of open communication of agreements and disagreements in a friendly atmosphere.

Finally, Vestry members desire a spirit of mutual respect among one another and with the Pastor. They seek to get to know one another with honesty, mutuality, Christian dignity, and respect for one another and one another's position.

Confidential

VIII. Reasons and Context for Prior Conflicts (Question 11)

It is a truism that we look backwards with 20/20 hindsight. The same is true for St. Paul's Episcopal Church. Vestry members identified a number of reasons that may have contributed to prior conflicts in welcoming and orienting the new pastor to the community. These include a number of items such as:

- Diminished leadership and guidance of the Episcopal Diocese in facilitating the decision making of the parish to hire the pastor
- The lack of a formal welcoming committee and transition team to assist the Pastor and the congregation to become adjusted to one another
- 10 years of uncertainty and turnover in clergy leadership which accelerated and may have exaggerated the role of the Vestry in carrying forth the leadership of the congregation without a sense of permanence vested in the Pastor or Rector
- The co-occurrence of a COVID pandemic and the first year of a new pastorate diminishing opportunities to gather
- Disconnects between the Pastor Selection Team and the congregation

IX. Top Priorities for St. Paul's Episcopal Church in the Future (Question 12)

To conclude, the individual interviews as part of the situation analysis Vestry members were asked to identify the top 3 priorities for the future of St. Paul's Episcopal Church. These priorities include:

- Building a comprehensive vision of the future of St. Paul's Episcopal Church
- Developing and reinforcing strong relationships among the congregation, with the Pastor and the Vestry, and with the Pastor and the congregation
- Developing a spirit of collaboration and consensus where all voices are heard for the future benefit of St. Paul's Episcopal Church

The consultant will work with Vestry members in May to develop a five-year vision and strategy for the future of the congregation. Most Vestry members believe it is important to have evolutionary goals for the next five years with realistic strategies and actions for the future which the plan will reinforce.

Vestry members also believe it's important to have this plan celebrate its centennial and relaunch and reengage the mission and programs and works of the congregation both within the community and out to the larger society.

Vestry members believe that this vision and strategy for the future should encourage people to give more generously and reengage older members of the congregation. Vestry members believe that this future of the church should provide an outreach to younger members. They also believe it should have a strong, substantial plan with a deficit reduction strategy.

Vestry members believe the plan for the future of the church should have a strong understanding of the financial reserves and to provide to increase the membership for the future who are enthusiastically committed to their worship together and the life of St. Paul's as a vibrant Episcopal community.

Secondly, members of the Vestry believe that the future of St. Paul's depends upon strong and vibrant relationships that need to be strengthened as part of the plan for the future. Separate initiatives will be recommended during the consultation to help the Vestry reestablish strong and clear governance practices as well as engage the community in suggesting their ideas for the future vibrancy of the congregation.

In short, Vestry members seek favorable Vestry and Pastor relations, favorable Pastor and congregation relationships, and favorable relationships between St. Paul's Episcopal Church and the larger society.

Finally, to conclude their recommendations, Vestry members seek a spirit of collaborative leadership with a sense of trust and appropriate display of authority by both the Pastor and members of the Vestry. This means the regular engagement in decision making before those decisions are announced to the community. This may in fact slow down the pace of change of the congregation, but it will ground recommended changes for the future in assurance that they have been understood before they are implemented.

Some Vestry members observed that they would like to help parishioners understand the Episcopal Church and their Christian faith in a place where the church has healthy and organized communication and everyone's voice is to be heard.

Confidential

EXHIBIT “9”

From: Steven Ellcessor <sjellcessor@gmail.com>
Sent: Wednesday, September 10, 2025 9:33 PM
To: Deborah R. Stambaugh <dstambaugh@wispearl.com>
Subject: Re: In Re: The Rev. Dr. Daniel Wade McClain (2023-01)

Yes, these I have and Jodi Baron has info for us to review for fashioning a response. What I don't see in my file are any interrogatories that we served on Deb. Requests for production, yes, but no interrogatories.

And I see no response from Deb to our requests. I would like to call Deb on that, perhaps before the panel, given her assertion today that she had sent us "116 pages of responsive documents." But need to be certain first.

Sent from my iPhone

On Sep 10, 2025, at 6:08 PM, Deborah R. Stambaugh <dstambaugh@wispearl.com> wrote:

Attached are our interrogatories and requests for production of documents, which were served on September 23, 2024.

From: Katie Ruggieri <kruggieri@wispearl.com>
Sent: Monday, September 23, 2024 3:44 PM
To: sjellcessor@gmail.com; dadams@fbtlaw.com
Cc: Deborah R. Stambaugh <dstambaugh@wispearl.com>
Subject: In Re: The Rev. Dr. Daniel Wade McClain (2023-01)

Counsel:

Attached please find Interrogatories and Requests for Documents from Deborah Stambaugh.

Thank you,
Katie

Katie Ruggieri
Legal Assistant/Paralegal

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<Request of Docs of Respondent to Comp..pdf>
<Interrogatories of Respondent to Comp..pdf>

WISLER PEARLSTINE, LLP

By: Deborah R. Stambaugh, Esq.

Attorney Id. No. 60343

460 Norristown Road, Suite 110

Blue Bell, PA 19422

Tel: (484) 321-5012

dstambaugh@wispearl.com

Attorneys for Respondent,

IN RE: The Rev. Dr. Daniel Wade McClain

Respondent,

Hearing Panel of the Disciplinary Board of
The Episcopal Diocese of South Ohio

Case No. 2023-01

**FIRST SET OF INTERROGATORIES OF RESPONDENT TO THE EPISCOPAL
DIOCESE OF SOUTHERN OHIO**

Pursuant to following “Instructions” and “Definitions,” Respondent, The Rev. Dr. Daniel Wade McClain (“Respondent”), by and through its undersigned attorneys, hereby requests that the Episcopal Diocese of Southern Ohio (“Church”), shall answer the following requests for interrogatories within 30 days of service hereof.

DEFINITIONS AND INSTRUCTIONS

- A. These interrogatories shall be deemed continuing and require supplemental responses if Respondent acquires any additional information or documents between the time a response is served and the time of trial.
- B. In responding to these requests, the Church shall furnish all information and documents available to it at the time of its response, including information and/or documents which can be obtained by the exercise of reasonable diligence and information and/or documents in the possession of its agents. These requests also seek information and documents, unless privileged, available to the Church’s attorneys.
- C. All terms defined below are used throughout these interrogatories in the precise manner in which they have been defined and are to be consistently so interpreted. Some terms are

specially defined so as to have a broader meaning herein than they do in general usage and, accordingly, responses will be inadequate that do not take into account the special sense in which terms such as “document,” “identify” and “relating to” are defined and used.

- D. As used herein, the term “***document***” means the original and any non-identical copy or copies and any draft of any written, electronic, printed, recorded, graphic or photographic matter or sound reproduction, however produced or reproduced, including, but not limited to, correspondence, email, telegrams, other written communications, contracts, orders, agreements and written communications relating thereto, diaries, memorandums, logs, notes, official forms including official form designation numbers, slides, analyses, projections, delivery schedules, work papers, calendars, tape recordings, computer print-outs, e-mails, tapes and/or disks, minutes of any board, committee or other meetings, prepared or received by, or in the possession, custody or control of You, or the identity, existence or location of which is known by You.
- E. As used herein, the terms “***relate to***” and “***relating to***” (a) when used in connection with any allegation, contention, claim, demand, act, action, activity, accounting, practice, process, occurrence, occasion, course of conduct, contractual provision or document, happening, relationship, scheme, conference, meeting, discussion, communication, development, service, instance, incident, event, etc., means used or occurring or referred to in the preparation therefore, or in the course thereof, or as a consequence thereof; and (b) shall also mean referring, constituting, comprising, containing, setting forth, showing, disclosing, describing, explaining, summarizing, concerning or referring to, directly or indirectly.

F. Unless otherwise indicated by the context, the term “*identify*” or “*identity*”: (a) when referring to a document shall require a brief description of the document, its title or identifying symbol, its date, name and address of persons originating, name and address of persons to whom it was directed, its location and its present custodian; (b) when used in connection with an oral communication, shall require identification of each person who made the communication and to whom such communication was made, the date it was made, the manner of communication, and the place at which each person was located; (c) when used in referring to a person, shall require furnishing the following information concerning such person:

- a. full name;
- b. age;
- c. the current or last known business and home address;
- d. the current or last known employment position; and
- e. the current or last known telephone number.

G. The terms “*describe*” or “*description*,” when used with respect to any act, actions, accounting, activity, audit, practice, process, occurrence, occasion, course of conduct, happening, negotiation, relationship, scheme, communication, conversation, conference, discussion, meeting, development, service, transaction, instance, incident or event, mean provide the following information:

- a. Its general nature;
- b. The time and place thereof;
- c. A chronological account setting forth each element thereof, what such element consisted of and what transpired as a part thereof; and

- d. The identity (as defined above) of each person who performed any function or had any role in connection therewith (e.g., speaker, participant, contributor of information, witness, etc.) or who has any knowledge thereof, together with a description of each such person's function, role, or knowledge.
- H. “**You**” and “**Your**” shall mean the Church in their individual capacity and their agents, attorneys and all other persons acting or purporting to act on their behalf.
- I. The word “**Parish**” shall mean Saint Paul Church and all relevant affiliates or parties that pertain to this complaint.
- J. The word “**Diocese**” shall mean the Episcopal Diocese of South Ohio.
- K. The word “**person**” shall mean and include any natural person, partnership, firm, corporation, pension fund, pension plan, trust, unincorporated association, group, governmental entity, organization, joint venture or any other form of business organization, arrangement and/or entity.
- L. The word “**date**” shall mean and include the exact day, month, and year if ascertainable, or if not, the best approximation including relationship to other events.
- M. With respect to any document as to which a privilege is asserted or for which on some other asserted ground a response is not provided:
 - a. State the nature of the privilege asserted or ground relied upon (e.g., attorney-client, work product, etc.);
 - b. State the name of the attorney with respect to whom any privilege is claimed;
 - c. State the factual basis for claiming any privilege as to the specific information or document involved;

- d. Identify each oral communication or document not disclosed or produced by speaker or author, audience or addressee, persons who heard or may have heard the oral communication or to whom copies of the document were furnished or may have been furnished, and date, and describe the subject matter of each such oral communication or documents; and
 - e. Identify any portion of any oral communication or document that is not privileged.
- N. The terms “and,” “or,” and “and/or” shall be interpreted both disjunctively and conjunctively so as not to exclude information from the scope of the interrogatory.
- O. References to the singular include the plural, and references to the plural include the singular.

INTERROGATORIES

1. Identify all witnesses who will testify before the Hearing Panel and describe their anticipated testimony.

ANSWER:

2. Identify the individual(s) who claim(s) Respondent had accused him of committing an “unforgiveable sin.” Describe the conversation.

ANSWER:

3. Identify the individual(s) who claim Respondent attempted to turn people against Ms. McClain. Describe all statements by Respondent which were allegedly made for the purpose

of turning people against Ms. McClain. State the date, time and location of all such statements, and identify the persons to whom such statements were made.

ANSWER:

4. Describe how Ms. McClain was perceived by members of the Parish (1) when Respondent hired her, (2) when she publicly objected to masking; (3) when the vestry voted to end her employment with the Parish, and (4) when her attendance at services became limited.

ANSWER:

5. Identify the individual(s) who claim Respondent exposed Ms. McClain's health or psychological information to them. State the date or approximate date on which such information was allegedly disclosed to them by Respondent.

ANSWER:

6. Identify the individual(s) who stated that Ms. McClain "left the family home" when she filed for a civil protective order.

ANSWER:

7. Explain all knowledge and all evidence in the possession or control of the Diocese regarding Respondent's access to marital possessions after Ms. McClain caused a civil protective order to be entered against Respondent in 2022.

ANSWER:

8. Explain all knowledge or evidence in the possession or control of the Diocese related in any fashion to locks being changed at Ms. McClain's residence in 2022. State the date on which locks were changed.

ANSWER:

9. Explain why the Church Attorney believes Ms. McClain and the Respondent were in reconciliation talks and describe all evidence of such talks.

ANSWER:

10. Describe all instances in which Ms. McClain publicly recanted her allegation of domestic abuse.

ANSWER:

11. ~~Describe all instances in which Ms. McClain worked to rehabilitate her husband's public reputation after her allegation of domestic abuse became public.~~

ANSWER:

12. Describe all instances in which the Diocese worked to publicly rehabilitate Respondent's reputation after the bishop announced that an allegation of domestic abuse had been made by Ms. McClain against her husband and after the bishop told the Parish about a protective order issued by the court.

ANSWER:

13. ~~Explain how the Complainant, Eric Bonetti, is aware of the type of vehicle driven by Ms. McClain.~~

ANSWER:

14. Describe with specificity all false or deceptive statements that the Diocese alleges Respondent made during his divorce proceedings, including (1) the exact statement; (2) to whom the statement was made; (3) the date on which the statement was made; (4) all witnesses to the statement; (5) how the statement was relied upon by another person; and (6) all evidence that supports or controverts the truth or falsity of the statement.

ANSWER:

15. State the dollar amount of all funds that you contend were paid to Ms. McClain by Respondent during the years 2022, 2023, and 2024, and state the dollar amount of all funds that you contend should have been paid to Ms. McClain by Respondent during the years 2022, 2023, and 2024.

ANSWER:

16. Identify and describe all court documents that you contend required Respondent to pay for Ms. McClain's insurance as alleged in the Church Attorney's written statement of the case.

ANSWER:

17. ~~Explain why the Church Attorney has interpreted information about insurance payments negatively towards Respondent rather than evaluating whether he paid for her insurance much longer than he was required to do so by court order.~~

ANSWER:

18. ~~Identify and describe all cash amounts in excess of court ordered payments that Respondent paid to Ms. McClain during the summer of 2022.~~

ANSWER:

19. State the full amount of rent paid by Ms. McClain for her residence during the years 2022, 2023, and 2024, and identify who owned the residence lived in by Ms. McClain during the years 2022, 2023, and 2024.

ANSWER:

20. ~~To the extent the Diocese believes it is appropriate for the Church to participate in or comment on divorce proceedings that will ultimately determine whether Respondent is permitted to send his children to public school, state all grounds upon which the Diocese asserts such right.~~

ANSWER:

21. For all divorce court motions discussed in the Church's Written Statement of Complaint against Respondent, state the divorce court's ultimate ruling.

ANSWER:

22. Identify and describe all medical issues of Ms. McClain that you allege Respondent discussed with other people. State the date, time, and location that you allege Respondent had the discussion, and state all persons who were witnesses to the discussion.

ANSWER:

23. Identify each person who has personal knowledge about the allegation that the Parish made a \$30,000 loan to Respondent. This interrogatory requires you to disclose all individuals who will testify that the Parish made a loan to Respondent.

ANSWER:

24. Explain why the Church's publication of the Respondent's family financial situation fails to include information about Respondent's father providing Respondent and Ms. McClain a loan to pay off credit card debt.

ANSWER:

25. ~~Regarding your allegation that Respondent performed an "exorcism" of a building, identify and describe all canons of The Episcopal Church, and every page of the Book of Common Prayer which prevent Respondent from performing an "exorcism" of a building.~~

ANSWER:

26. For all clergy other than Respondent in the Diocese of Southern Ohio who have been disciplined for non-compliance with the Book of Common Prayer during the years 2023, and 2024, identify the parish where the non-compliance occurred, and state the discipline imposed.

ANSWER:

27. Identify and describe all acts of retaliation by Respondent. This interrogatory requires you to identify the person against whom the retaliation allegedly occurred and identify the witness who will testify about the alleged retaliation.

ANSWER:

WISLER PEARLSTINE, LLP

By: /s/ Deborah R. Stambaugh
Deborah R. Stambaugh
Attorneys for Respondent,
The Rev. Dr. Daniel Wade McClain

Date: September 23, 2024

WISLER PEARLSTINE, LLP

By: Deborah R. Stambaugh, Esq.
Attorney Id. No. 60343
460 Norristown Road, Suite 110
Blue Bell, PA 19422
Tel: (484) 321-5012
dstambaugh@wispearl.com

Attorneys for Respondent

IN RE: The Rev. Dr. Daniel Wade McClain

Respondent,

Hearing Panel of the Disciplinary Board of
The Episcopal Diocese of South Ohio

Case No. 2023-01

CERTIFICATE OF SERVICE

The undersigned, Deborah R. Stambaugh, certifies that a true and copy of the foregoing First Set of Interrogatories of Respondent to the Episcopal Diocese of Southern Ohio was served to counsel of record via e-mail on the date listed below:

Via email only:
Steven J. Ellcessor, Esquire
sjellcessor@gmail.com

Via email only:
Deborah S. Adams, Esquire
dadams@fbtlaw.com

WISLER PEARLSTINE, LLP

By: /s/ Deborah R. Stambaugh
Deborah R. Stambaugh
Attorneys for Respondent,
The Rev. Dr. Daniel Wade McClain

Date: September 23, 2024

WISLER PEARLSTINE, LLP

By: Deborah R. Stambaugh, Esq.
Attorney Id. No. 60343
460 Norristown Road, Suite 110
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Attorneys for Respondent

IN RE: The Rev. Dr. Daniel Wade McClain

Respondent,

Hearing Panel of the Disciplinary Board of
The Episcopal Diocese of South Ohio

NO. 2023-01

**FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS OF RESPONDENT
TO THE EPISCOPAL DIOCESE OF SOUTHERN OHIO**

Respondent, The Rev. Dr. Daniel Wade McClain (“Respondent”), by and through its undersigned attorneys, hereby requests that Complainant, the Episcopal Diocese of Southern Ohio (“Church”), respond to the following requests for production of documents within 30 days of service, that Complainant produce all of the requested documents, and that all documents so produced be Bates labeled.

DEFINITIONS AND INSTRUCTIONS

These Requests are subject to the following instructions and definitions, each of which is incorporated within each of the following requests:

1. “**Documentation**” includes, without limitation, any written, recorded or graphic matter, however produced or stored, including but not limited to: correspondence, telegrams, faxed communications, notes, or other written and/or electronically transmitted communications; notes of oral communications, telephone conversations, meetings or other notes recording any information, discussion, directives, questions, or conversations; calendars, appointment books, logs, diaries, notebooks, or similar materials; investigative files and related materials; contracts or agreements; memoranda; reports; studies; recordings; films, audio-video materials; video materials; computer print-outs or media; tapes or cassettes; work papers; orders; changes orders, extra work orders, additional work orders and force account orders and related documents analyses; projections; telephone messages; photographs; charts, plans, drawings, specifications, or other visual materials; and other compilations of data from which information can be obtained by any means.

2. The term “**documentation**” also includes any non-identical copies and drafts of any of the foregoing, in addition to the original document, which copies and drafts include writings, notations, corrections, or markings peculiar to such copy or draft.

3. In the event that any document referred to or identified has been destroyed or otherwise disposed of, that document is to be identified by (i) the author; (ii) the addressee, including persons to whom carbon or blind copies were addressed; (iii) the date; (iv) the subject matter; (v) the number of pages, attachments or appendices; (vi) all persons to whom the document was distributed, shown or explained; (vii) a description of the circumstances under which the document was destroyed or otherwise disposed of; (viii) the date of destruction, or other disposition; (ix) the person who destroyed or disposed of the document; and (x) the person who directed or authorized such destruction or disposition.

4. “**Identify**” as used in connection with a person or entity means to set forth his, her, or its full name, residential and employment address if a natural person, and location if not a natural person, and to supply any available telephone or email addresses for the person or entity.

5. The term “**identify**” as used in connection with a document means to state its type (e.g., email, letter, memo and so on), date, the identity of its author(s), the identity of its sender(s), the identity of the person(s) or entity(ies) to whom it was addressed, the identity of the recipient(s), a description of the title and format of the document, the number of pages of the document, the identity of each person known or believed to have possession, custody, control of or access to any copy or original of the document, and a detailed description of the substance and content of the document. Requests that cannot be so answered shall be answered as completely as possible and shall specify the reasons for the incompleteness.

6. “And” shall mean and/or.

7. The terms “you,” or “your,” shall mean the person to whom these Requests for Admission are addressed as well as his authorized agents, representatives, and anyone acting on his behalf.

8. The word “**Parish**” shall mean Saint Paul Church and all relevant affiliates or parties that pertain to this complaint.

9. The word “**Diocese**” shall mean the Episcopal Diocese of South Ohio.

DOCUMENTS REQUESTED

1. All documents the Diocese may use as evidence or exhibits before the Hearing Panel.

ANSWER:

2. To the extent the Diocese has any diocesan policies other than those promulgated by the Episcopal Church Foundation related to clergy taking leave or related to Covenants of Departure, please produce copies of all such policies.

ANSWER:

3. The anti-nepotism policy of the Parish.

ANSWER:

4. All documents showing the date on which a copy of the anti-nepotism policy of the Parish was provided to the Respondent.

ANSWER:

5. The Parish's September 28, 2021 vestry meeting minutes.

ANSWER:

6. The Parish's meeting minutes from the vestry meeting for the date on which the vestry was notified that Kate McClain had been hired.

ANSWER:

7. All documents showing any and all amounts the Parish paid for lunches of the McClain children.

ANSWER:

8. All documents evincing the financial malfeasance alleged against Respondent, and all documents evincing "loosey goosey" finances.

ANSWER:

9. The Parish's service leaflets for its the Feast of All Souls, and the Veteran's Day masses in 2022 and 2023.

ANSWER:

10. Copies of any and all video recordings of the Feast of All Souls, and the Veteran's Day masses in 2022 and 2023.

ANSWER:

11. All documents related in any fashion to whether Mother Margaret (Peg) Sammons's name was not read in a necrology.

ANSWER:

12. Any and all covid-19 policies that applied to the Parish.

ANSWER:

13. All letters to Bishop Wayne Smith that will be referenced by any witness before the Hearing Panel.

ANSWER:

14. All photograph's of Respondent in the possession or control of the Parish or the Diocese.

ANSWER:

15. All documents supporting or controverting your contention that Respondent made a “formal commitment” to repay the \$30,000 through increased pledges.

ANSWER:

16. All documents evincing the amount per year that the Respondent’s family promised to pay in pledges during the years 2020, 2021, 2022, and 2023.

ANSWER:

17. All tax documents provided by the Parish to Respondent for the 2020 tax year.

ANSWER:

18. All documents showing that Respondent spent significant sums of money on items for personal use, including documents showing what the items were and how they were used for personal use.

ANSWER:

19. All documents you referred to or relied upon in answering Respondent’s First Set of Interrogatories or in any subsequent set of written discovery requests.

ANSWER:

20. All documents that tend to support, contradict, or otherwise pertain to the allegations in these Title IV proceedings.

ANSWER:

21. All documents identified in your answers to Respondent's Interrogatories directed to Complainant.

ANSWER:

22. All evidence of any kind related to any letters or packages that the Church contends were sent by Respondent.

ANSWER:

23. All reports and all communications related to this matter from any and all experts the Diocese will call to testify at trial.

ANSWER:

24. All curriculum vitae of all experts the Diocese will call to testify at trial.

ANSWER:

WISLER PEARLSTINE, LLP

By: /s/ Deborah R. Stambaugh
Deborah R. Stambaugh
Attorneys for Respondent,
The Rev. Dr. Daniel Wade McClain

Date: September 23, 2024

WISLER PEARLSTINE, LLP

By: Deborah R. Stambaugh, Esq.
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Attorneys for Respondent

IN RE: The Rev. Dr. Daniel Wade McClain <i>Respondent,</i>	Hearing Panel of the Disciplinary Board of The Episcopal Diocese of South Ohio Case No. 2023-01
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CERTIFICATE OF SERVICE

The undersigned, Deborah R. Stambaugh, certifies that a true and copy of the foregoing First Set of Requests for Documents of Respondent to the Episcopal Diocese of Southern Ohio was served to counsel of record via e-mail on the date listed below:

Via email only:
Steven J. Ellcessor, Esquire
sjellcessor@gmail.com

Via email only:
Deborah S. Adams, Esquire
dadams@fbtlaw.com

WISLER PEARLSTINE, LLP

By: /s/ Deborah R. Stambaugh
Deborah R. Stambaugh
Attorneys for Respondent,
The Rev. Dr. Daniel Wade McClain

Date: September 23, 2024

EXHIBIT “10”

My name is Charles Henry McClain. I am a Midshipman in the Navy and a full-time student attending Holy Cross College at Notre Dame, Indiana. I am also the oldest son of Daniel McClain. I have read what the diocese posted on 9/30. To be specific,

“Church members recall one disturbing incident during a young adult Bible study conducted on ZOOM in which Respondent and his son participated. Loud noises from the McClain household were heard on the call followed by Respondent angrily accusing his oldest son Henry of disrespecting Kate McClain. Respondent picked up a watermelon, smashed it on the floor and then loudly told Henry ‘You caused this, you clean it up’. (Smith Affidavit, Exhibit AA, paragraph 4.)”

When I was between the ages of twelve and thirteen years old, I got into an argument with my mother, Katherine McClain, in the kitchen of our house in Williamsburg, VA. This was long before my dad even applied for the job at St. Paul’s Episcopal Church. So, there was certainly no ZOOM meeting happening. When my dad walked into our argument, he gave me multiple chances to calm down and resolve the argument, but I refused and called my mother some foul names. When my dad heard me use this unacceptable language, he dropped the watermelon he was holding on the ground. He then said, “You made a mess, clean up your mess”. There was no raised voice from him, or loud noises, and I certainly never felt scared or in danger. In fact, the only thing I felt was disappointment in myself for what I said to my mother. This was an amazing teaching moment, and reflecting on it today, I think it taught me one of the most important lessons of my childhood. That when you talk to people like I did that day, there are consequences. Many parents I know would’ve spanked me, or taken things away, which would have not gotten the lesson across so deftly. It is a parent's duty to prepare their children for the responsibilities of adulthood. As an adult, you don’t get spanked or have your phone taken away for foul language; there are real consequences, like losing your job. Dropping that watermelon was a genius teaching moment to show how actions lead to consequences.

It is absolutely ridiculous that the diocese has turned to fabricating lies to persecute my dad. Please ask yourself, what does it mean when someone who claims they have an incredibly strong case starts coming up with complex and untrue stories? It seems to me that the truth is evident; the diocese doesn’t have any case at all, so they have resorted to lying. The diocese has made a real mess, and instead of cleaning it up, they’re doubling down on persecuting an innocent man. I hope that someone holds them accountable for the mess they’ve made and makes them clean it up.

Signed,

Charles Henry Wade McClain

06OCT2025