IN THE EPISCOPAL DIOCESE OF TENNESSEE AT NASHVILLE

IN RE: THE REV. MATTHEW LEWIS

TO: THE HEARING PANEL

FROM: JASON CALLEN, CHURCH ATTORNEY

DATE: JULY 26, 2023

CHURCH ATTORNEY'S STATEMENT OF ALLEGED OFFENSES

Pursuant to Canon 13.2 of Title IV of the Constitution and Canons of the Episcopal Church the following is the Church Attorney's Statement of Alleged Offenses regarding the allegations made against the Respondent, The Rev. Matthew Lewis, which allegations have been referred to the Conference Panel for its consideration.

Complainants: , &

Respondent: The Rev. Matthew Lewis

The complaint alleges that The Rev. Matthew Lewis by his conduct through acts and or omissions has violated the Canons of the Church regarding the standards of conduct of the clergy and more particularly:

Canon IV.4.1 (c) abide by the promises and vows made when ordained; Canon IV.4.1 (h) (1) refrain from any act of Sexual Misconduct; and Canon IV.4.1 (h) (9) refrain from any Conduct Unbecoming a Member of the Clergy.

I. <u>Violations of Canons IV.4.1(h)(1)</u>

1. The acts of sexual misconduct by Rev. Lewis involve his inappropriate relationship with a member of Christ Church Cathedral, where Rev. Lewis served as Associate Rector.

2. Rev. Lewis had a romantic relationship with between April and December 2017. Although the relationship was generally not physical, it was emotionally intimate with sexual overtones. Also, at the time, was (and remains today) married to

3. Rev. Lewis,	The relationship began and		, attend	led by
4.				

told Rev. Lewis that she had romantic feelings for him and apologized. Rev. Lewis responded, "**The second s**

5. and Rev. Lewis continued to discuss their feelings for one another. Rev. Lewis wondered if he should tell The Very Rev. Timothy E. Kimbrough, Dean and Rector of Christ Church Cathedral, and whether he should leave or quit. encouraged Rev. Lewis not to do this and expressed her intent to deal with it.

6. Yet, ______, and Rev. Lewis continued to meet. At some point during the week of April 24, 2017, ______ kissed Rev. Lewis briefly on the cheek, without any response from Rev. Lewis.

7. The following week, on April 29, 2017, agreed that they should end their romantic relationship. During this conversation, Rev. Lewis noted how long he might be willing to wait for the should be which she responded that he should not do so as she was not leaving her husband. Towards the end of the conversation, Rev. Lewis kissed the back of the back

8. Nonetheless, Rev. Lewis and engaged in mutual boundary testing in the weeks following during May 2017. During this period, Rev. Lewis made romantic and sexual comments. This includes his telling

, he stared at her in a side view mirror and thought how pretty she was. Rev. Lewis also commented at some time that it was miracle the two of them were able

9. Also in May and July 2017, Rev. Lewis sent at least one text and one email to that were romantic or sexual in nature. In the first text, Rev. Lewis told that that he wished he had kissed her and that he knew he shouldn't say this but that it was true. In the email, Rev. Lewis sent **a** link to a YouTube video of a Disney love medley. The email otherwise had no text in the body and no subject line.

10. In the months that followed, Rev. Lewis and continued to have discussions with one another in which they acknowledged feelings for one another.

11. In November 2017, told her husband what had transpired between Rev. Lewis and her. Around this time, the romantic relationship between and Rev. Lewis concluded.

12. In early 2022, Rev. Lewis asked to meet with a Chick-Fil-A and Rev. Lewis apologized for comments and asked for forgiveness.

13. Canon 2 of Title IV defines Sexual Misconduct as:

(a) Sexual Abuse or (b) Sexual Behavior at the request of, acquiesced to or by a Member of the Clergy with an employee, volunteer, student, counselee of that Member of the Clergy or in the same congregation as the Member of the Clergy, or a person with whom the Member of the Clergy has a Pastoral Relationship.

(b) Sexual Behavior shall mean any physical contact, bodily movement, speech, communication or other activity sexual in nature or that is intended to arouse or gratify erotic interest or sexual desires.

14. The actions of Rev. Lewis detailed above are acts of sexual behavior, as they were intended to arouse or gratify the Rev. Lewis's erotic interest or sexual desires, and constitute sexual misconduct.

II. <u>Violations of Canon IV.4.1(c) and (h)(9)</u>

15. The acts of failure to abide by the promises and vows made when ordained and conduct unbecoming a member of the clergy by Rev. Lewis involve his relationship with , an inappropriate interaction with , and comments made by him to

16. During a spring 2022 , Rev. Lewis asked if if he could borrow her phone. She unlocked and handed the phone to him.

17. Rev. Lewis went through text messages and ran searches using the terms "sex," "ass," and "fuck." Also, as Rev. Lewis scrolled through her text messages, he pausing to look at the names of men and to see the most recent message.

18. ultimately took her phone back, asking, "What are you doing?" Rev. Lewis replied, "What? You consented." This response was particularly upsetting to as she previously shared with Rev. Lewis that she had been a victim of sexual assault in the past.

19. In a separate instance, Rev. Lewis told that he only became a priest because his friends told him that he couldn't and that he really had wanted to be a lawyer.

20. Also, around Christmas 2017, Rev. Lewis attended an art crawl with and other Christ Church parishioners where the group consumed wine. Following the art crawl, the group returned to Christ Church. Rev. Lewis asked and the state of the bell tower and she agreed. At the landing, as both were laughing, Rev. Lewis pinned against the wall with his hands on either side of her head. She shoved him away and both began laughing again.

21. The vows taken by Rev. Lewis in ordination include belief that the candidate has been "truly called by God and his Church to this priesthood" and a promise by the candidate to commit themselves to this "trust and responsibility." (BCP at 531).

22. Rev. Lewis's comments cited above constitute a failure to abide by the promises and vows he made when he was ordained.

22. The vows taken by Rev. Lewis in ordination also include a promise to "do your best to pattern your life [and that of your family, or household, or community] in accordance with the teachings of Christ, so that you may be a wholesome example to your people". (BCP at 532)

23. Rev. Lewis's relationship and communications with the complainants described herein constitute a violation of his ordination vow to pattern his life in accordance with the teachings of Christ and be a wholesome example to his people.

24. Canon 2 of Title IV defines **Conduct Unbecoming a Member of the Clergy** as: "Any disorder or neglect that prejudices the reputation, good order and discipline of the Church, or any conduct of a nature to bring material discredit upon the Church or the Holy Orders conferred by the Church."

25. Rev. Lewis's actions, detailed above, prejudice the reputation, good order and discipline of the Church and bring material discredit to the Church and are unbecoming a member of the Clergy. His actions reflect a pattern of issues with judgment, boundaries, communication, and ability to fulfill responsibilities.

26. It is submitted that the behavior of Rev. Lewis has violated the provisions of Title IV Canon 4.1 of the Constitution and Canons of the Episcopal Church and has rendered him subject to disciplinary sanctions as provided in Title IV Canon 12 and 14.

Respectfully Submitted,

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