### HEARING PANEL OF THE DISCIPLINARY BOARD OF THE EPISCOPAL DIOCESE OF TENNESSEE

THE EPISCOPAL DIOCESE OF TENNESSEE

٧.

THE REVEREND MATTHEW LEWIS

# RESPONSE OF THE RESPONDENT REVEREND MATTHEW LEWIS TO THE CHURCH ATTORNEY'S STATEMENT OF ALLEGED OFFENSES

In accordance with the provisions of Canon IV.13.2(c) of the Constitution and Canons of the Episcopal Church, the Respondent, the Reverend Matthew Lewis, responds to the Church Attorney's Statement of Alleged Offenses as follows:

#### **INTRODUCTION**

I would like to write here of what "reconciliation" has come to mean for me.

"Let the whole world see and know that things which were being cast down are being raised up." Some time ago now I encountered anew The One Who Raises Up. Over the course of my last years in ministry I began doing things I'd never done before—like preaching extemporaneously, praying spontaneously with people on Broadway, starting a spiritual direction course, and joining in deep prayer with my friends on death row. My God, my God had become alive to me again—or rather I'd become alive to my God who'd never left; and my heart was awakened. And months before my sabbatical, I hurriedly arranged with priests in the diocese to meet in the Cathedral chapel to pray for the Holy Spirit to fall upon the church.

Who can know these things, their purpose and their power? And how can all of that have happened *then* only for me to have been delivered to that place I am at *now*?

My sorrow is deep and heartfelt for any mistakes I've made and any hurt I may have caused. At one point this began to consume me. As I'm sure it was for those I've hurt, this became the first thing I thought about when I woke up and the last thing before going to bed. It was as if I'd been asleep to those I love and the community I was called to serve. I know I was experiencing only

an echo of my own decisions, and I know I was trying to forgive and asking for forgiveness in others only for what I could not forgive in myself. It is a wicked wheel that would never end.

My friends, I am deeply grieved, and the inclining of my heart in love towards those I've hurt is endless like God's for me. There is simply no difference between these motions of forgiveness; it is the mystery of the third sentence of the Lord's prayer. There is much confusion that needs understanding and hurt that needs healing. But my ministry over the last years was truly out of an abundance, and it was filled with joy, and I am forever grateful to have shared it with you. For the mistakes of my past before, I have the assurance of one higher than the diocese.

I go to sleep now each night in the completion of God's goodness, and I wake up to it in the morning with expectation. My God has split my chains and has broken the wicked wheel that would have kept me in its hell. How could I fear anything now? Nothing can be threatened. Herein lies the peace of God. I only pray now for the priests to come who will lead the church into the renewal that I know awaits, and I am sorry I will not be a part of it. As for me, I am reconciled and freed to live in the light that shines on us all.

#### "Reconciliation."

It means hell cannot hold me, that the past is powerless against my God and spirit, and that the prison door is open wide. Enter into the heart of God-- it is deep and still and lovely, and it is home. I hold no grievances nor griefs now, O Lord. I've counted them long enough and I lay them down. And so, I only pray for the family of God, every single person. John and Timothy, and I love you. You are my brothers and sisters, though you may not say the same of me. And I pray that God takes the fear and hurt between us, and covers it over with love in the power and grace of the Spirit so that one day, in this life or in the next, we will truly look into the light in each other's eyes as one says "The peace of the Lord be with you." And the other replies, "And also with you."

#### **RESPONSE TO CHARGES**

As to the First Charge (Alleging Violation of Canon IV.4.1(h)(1))

Respondent denies that he engaged in any behavior rising to the level of Sexual Misconduct and therefore denies any violation of Canon IV.4.1(h)(1).

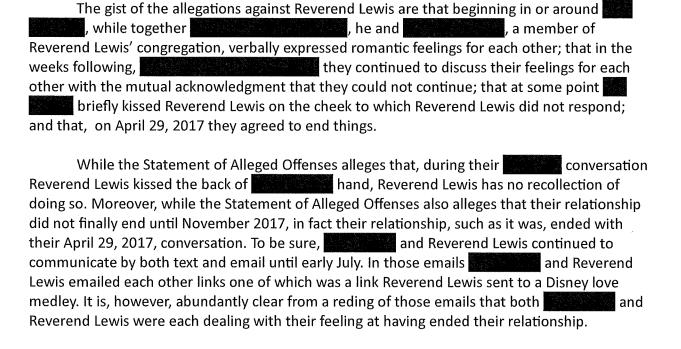
## As to the Second Charge (Alleging Violation of Canons IV.4.(c) and IV.4.1(h)(9))

Respondent denies that he engaged in acts constituting failure to abide by his ordination vows and denies engaging in acts constituting Conduct Unbecoming a Member of the Clergy and therefore denies any violation of Canons IV.4.1(c) and IV.4.1(h)(9).

#### DISCUSSION

#### **Sexual Misconduct**

In order to prevail on the charge of Sexual Misconduct the Diocese must demonstrate by clear and convincing evidence (See: Canon IV.4.16) that Respondent either requested or acquiesced in Sexual Behavior; that is, "physical contact, bodily movement or other activity sexual in nature or that is intended to arouse or gratify an erotic interest or sexual desire" (emphasis added), with an individual in Respondent's congregation or with whom Respondent has a Pastoral Relationship. Moreover, the behavior alleged must be "material and substantial or of clear and weighty importance to the ministry of the Church" (emphasis added) (See: Canon IV.3(3)). The facts alleged in the Church Attorney's Statement of Alleged Offenses wholly fails to meet the Dioceses burden.



In early 2020, Reverend Lewis met with they apologized to each other, and they had a long conversation that ended in reconciliation and a commitment to remain friends. While Reverend Lewis admittedly acted inappropriately with a member of his congregation (and for which Reverend Lewis apologized directly to her and they both asked for each other's forgiveness), it is indefensible to describe Reverend Lewis' behavior as "sexual in nature" or "intended to arouse or gratify erotic interest or sexual desire" where the Statement of Alleged Offenses itself contain facts demonstrating that Reverend Lewis avoided engaging in behaviors of a sexual nature. Reduced to their essence the facts alleged show only that Reverend Lewis and expressed romantic feelings for each other over a short period of time, nothing more. Expressions of romantic feelings and a kiss on the cheek initiated by and to which Reverend Lewis did not reciprocate, hardly rise to the level of materiality and substance required by the Canons to establish Sexual Misconduct. Failure to abide by Ordination Vows Conduct Unbecoming a Member of the Clergy The Dioceses second claim alleges that, at a , Reverend Lewis asked to borrow cell phone and then, went through text messages and ran searches of various sexual terms. Reverend Lewis admits asking to look at her phone, He also admits that while in possession of her phone, he briefly searched words. Like the Offense of Sexual Misconduct, claims that a clergy person engaged in behavior constituting Failure to abide by Ordination vows or behavior constituting Conduct Unbecoming a Member of the Clergy require that the acts complained of be both material and substantial. Even a cursory review of the factual allegations In the Statement of Alleged Offenses belies any claim that they rise to the necessary level of materiality or substance. Reverend Lewis and were friends that regularly engaged in mutual teasing both verbally and in text messages and email. , Reverend Lewis observed either receiving or sending a text. In what historically was part of their mutual teasing, Respondent asked to let him see her phone. not only agreed, but she also unlocked her phone for him. Reverend Lewis had the cell phone in his possession for a very short time. He looked at the texts, jokingly searched words and returned the phone to

Reverend Lewis has no recollection of the specific words that he searched but believes that they were consistent with the mutual teasing that was a part of their relationship

with each other.

The Diocese also alleges that Reverend Lewis made the statement to he had only become a priest because his friends told him he couldn't and that he really wanted to become a lawyer. Reverend Lewis denies making any such statement. In addition, the Diocese alleges that, following a social event attended by both Reverend Lewis and Reverend Lewis asked is she wanted to go with him to the top of the Cathedral's bell tower, that agreed and that while there, Reverend Lewis pinned her to the wall with his hands on either side of her head. Reverend Lewis denies these allegations also. Reverend Lewis denies that he engaged in any inappropriate behavior with
Conclusion
While acknowledging that he acted inappropriately with submits that his behavior with was not of such materiality and substance as to rise to the level of Sexual Misconduct under the applicable Canons; and that, in the context of his longstanding relationship with the behavior alleged in the Statement of Alleged Offenses does not rise to the level of actionable conduct under the applicable Canons. Finally, Reverend Lewis categorically denies that he engaged in the behavior alleged by In sum, the facts alleged, and Reverend Lewis's behaviors do not support the charges against him.
Respectfully submitted,

**Reverend Matthew Lewis**