

**A TIME TO LEARN:
A COMPARAISON OF POLICIES DEALING WITH CLERGY SEXUAL MISCONDUCT**

By

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In 1993, when I drafted a proposed code for dealing with sexual misconduct for the Central Conference of American Rabbis, there were virtually no other religious organizations that had code provisions from which I could draw. Perhaps because of the scandals involving clergy that have rocked so many of our religious institutions, sometimes concerning some of our most respected clergymen, or the increased awareness of the phenomenon of people in helping professions using that trust to satisfy their own personal needs, many of our major religious institutions have developed policies to deal with sexual misconduct of their spiritual leaders. It is time for us to assess and share aspects of those provisions in an effort to learn from each other's efforts. As policies are constantly reviewed, updated and altered, this article may begin a process by which we support each other by the sharing of our collected wisdom in dealing with this most difficult issue. In addition, codes both signal to our religious communities and the public how seriously we take this issue through the thoroughness of our crafted policies.

To better appreciate the impact of the various code provisions that will be highlighted, it is useful to identify various stakeholders and values that are deeply impacted by claims of clergy sexual misconduct. Clearly, we have victims whose trust in religious leaders as well as the Divine who these priests, ministers, rabbis, imams, and pastors claim to represent. Then there are the perpetrators who have crossed boundaries, often to benefit their own needs at the expense of those they were there to help. Beyond these parties, there is the religious institution itself as well as other clergy and umbrella religious organizations that become tarnished by these actions. Then one should also consider the core values of trust, responsibility, integrity, fairness, honesty, accountability, and safety that become violated. It is no wonder that victims of clergy sexual misconduct feel as if 'a wrecking ball is continually smashing through their lives' as they often lose their trust and their faith based community. Accordingly, these regulations are aimed at advertising, addressing, preventing, policing, rectifying, helping victims and even, in limited situations, rehabilitating perpetrators.

These various codes attempt to create systems that establish who and how one brings a complaint, describes the investigation and hearing process along with listing possible remedies. Issues such as what evidence, the role of legal counsel, support systems for victims and alleged perpetrators, rehabilitating, the effect of a criminal investigation are addressed by some of the policies.

Clergy sexual misconduct can be defined as sexual or romantic contact which occurs concurrently with the clergy-congregant relationship. This conduct is a significant problem today and must be properly addressed by religious institutions as well as both lay and professional leadership. Although some cases are widely publicized, the truth is that it is difficult to determine exactly how extensive the problem is. Few reliable polls and surveys have been conducted. It is quite difficult to know when clergy sexual misconduct has taken place, except when an individual steps forward and admits that abuse has occurred. Thus, any statistics which have been produced probably do not show the full extent of the problem. A survey in 1984 reported that nearly 40% of ministers had sexual contact with a church member and over 75% of ministers knew of a minister that had sexual intercourse with a church member.¹ 17 percent of woman that participated in a 1990 study on sexual harassment in the United Methodist Church reported harassment from their own pastor². 42 percent of all respondents in this same survey reported unwanted sexual behavior by a colleague or pastor. In the same year a study conducted at Berkley of pastors, about 10 percent reported being sexually active with an adult parishioner.³ A study in 1993 of Southern Baptist pastors found that 70 percent reported knowing pastors who had sexual contact with a congregant.⁴ These findings, although not fully developed, suggest the breadth of the problem. When studies are pooled, we

find that an average of 4.4% of therapists have engaged in sexual misconduct. If we assume that the numbers among clergy come close to this and other helping professions, then indeed the issue of clergy misconduct would be significant.⁵

While these limited studies do suggest a significant problem, it is helpful to be mindful that the psychological and psychiatric communities in the 1960's and 1970's were not focused on the damage to patients and the need to expose the problems related to therapist-patient sexual involvement. According to Keenth Pope and Martin Williams,⁶ it was not until the second half of the 1980's that relevant research began substantiating the damage to patients. It was evolution in the general psychological and psychiatric communities for increased understanding of the dangers and damages caused by sexual relationships between people where there is an imbalance of power that finally began to permeate the religious communities. It is therefore somewhat understandable that the religious communities did not begin to come to terms with both the extent problem and the degree of harm to congregants until the late 1980's and early 1990's. Saying this however, it did take a rather long time for religious institutions to begin to take this issue seriously enough to enact codes of conduct the provided for serious consequences to match the seriousness of the then unaccountable damage being done.

There are two different types of measures that a congregation can use to deal with clergy sexual misconduct: preventative and responsive. Educating clergy as to what kinds of relationships are proper and which are not is an important example of a preventative measure. This type of education can take place in a number of ways including workshops and seminars, during seminary training or periodically during ones professional life, at conventions, via on-line education programs or other special programs. Once a problem has developed it is also necessary to have clear and appropriate responsive procedures with which to deal with the alleged sexual misconduct in place. These procedures are what this paper will focus on. Religious bylaws and codes regarding clergy sexual misconduct are important for a number of significant reasons. First, they should clearly lay out a procedure for investigating alleged abuse. It is vital that any complaints of abuse be properly investigated and resolved so that a pattern of abuse does not occur and parishioners can feel safe. Religious bylaws and codes should also serve as a warning to clergy about what can happen if they engage in sexual misconduct, as well as reassure laity and parishioners that the issue will be dealt with in an appropriate manner.

Congregants' safety and trust in the sanctity of the institution should be paramount. Congregants must also perceive the process as fair, open and honest. It is important to remember that the abuse can affect the entire congregation and not just those abused. Sanctions should be swift, consistent and remain in place until we are as certain as reasonably possible that this person will not abuse again. Unequivocal bylaws and codes also send an unmistakable message to the clergyperson that sexual misconduct is against the rules and will be dealt with accordingly. In addition to the perpetrator and the victim, those affected by the abuse include the place of worship, the parishioners, the hearing officers and the decision makers. The religious institution as well as the religion itself will undoubtedly suffer from the stigma. However, stigma would only be increased if it comes out that complaints of sexual misconduct are improperly handled or brushed under the rug. Other congregants will likely suffer from disillusionment and may lose their faith and trust in the institution and its representatives.

When a pastoral relationship turns into a romantic relationship, especially if spiritual counseling has been involved, there is generally a power imbalance between the parties that suggests that meaningful consent can rarely be given.⁷ This means that these types of relationships should seldom be condoned because the victim is unable to give true consent as a result of their position within the relationship.⁸ When clergy abuse their position of power to fulfill their sexual needs they may exhibit conduct that suggests they are sexual predators who have no place in a community of faith. It is important that these clergy are promptly dealt with which. In some cases the response may require that clergy be removed from their positions of power until they learn not to continue their misconduct and that they do not shatter people's ideas of spiritual healing. In extreme cases, it may be necessary to remove a member of the clergy from congregational work and/or teaching and/or pastoral counseling on an ongoing basis. For these reasons, intra-faith conduct, judiciary, and disciplinary procedures are very important.

When codes protect all parties involved in a clear manner, people who have a complaint against a member of the clergy may become more comfortable and less intimidated with the difficult decision of coming forward because they can believe that they will be treated fairly and that their interests will be protected. These codes are important and should define the improper behavior, direct those with a complaint as to the proper procedure and protect all parties involved including the congregation. The codes should outline the steps that will be taken by all parties so that each is treated fairly and will feel protected. There are many important issues that should be specifically addressed within these codes. A carefully crafted code or bylaw should be able to quickly manage and dispose of many of them.

However, after looking through the actual and suggested bylaws and codes of various religious organizations, we have found that many of the bylaws and codes are not specific enough. They fail to address many issues that are likely to arise when there is an allegation of abuse. If an issue, such as the presence of legal representation during religious proceedings comes up and it is not addressed in the bylaws or codes, problems may ensue and parties may feel that they are being treated unfairly. Whereas if the issue had been addressed in the code or bylaw, each case would be treated in a manner consistent with others and the question raised could be quickly resolved.

It should be noted that much of the bylaws cited herein come not from the overarching religious organization, but rather branches or sub-organizations, typically in a particular geographical region. Others, like the Catholic codes quoted, come from a private organization, which has developed these codes with the purpose and intent to sell them to different Catholic churches. The uniformity, or lack thereof, of codes within a religious group is something that each religion must decide for itself, according to its policies. Other religions, like Judaism, may have different codes in each of the denominations. It is interesting to note that the most complete and stringent procedures are found in the liberal traditions while few specific provisions are found in the more traditional sects.

It is critical that codes should address what types of behaviors, in the eyes of the institution, give rise to a proper claim. This helps reduce confusion in the case of a victim who is unsure whether their experience constitutes misconduct. In addition to specifying what type of behavior can give rise to a claim, it is also beneficial to address who is responsible for bringing a claim, and whose claims will be investigated.

Catholic bylaws state that without accompanying verifiable facts, anonymous complaints will not be investigated.⁹ This policy is good because it treats all anonymous complaints equally. Thus the Catholic Church would be limiting litigation from someone who feels slighted because they were abused and made an uninvestigated, anonymous complaint when others anonymous complaints were investigated. The suggested Catholic bylaws impose a duty on clergy, staff and volunteers to report their own misconduct as well as that of others and provide that the reporter should also notify the proper civil or criminal authorities as well.¹⁰ The Methodists does not impose a duty to report or address the issue of anonymous complaints but provides that anyone who has knowledge of possible misconduct may bring a claim.¹¹ Jewish codes state that a complaint will not be accepted for investigation without “specific information about the approximate dates, location and type of alleged misconduct.”¹²

Most religious organizations specify who can bring a claim. However the Lutherans, Jews, Presbyterians and Unitarians do not. Additionally, once claims are brought, it is important that the bylaws state how the claim will be handled, whether and to what extent the proceedings will be private, anonymous (i.e. clergy “Doe” and congregant “Roe”) or fully public. Does the judicial or quasi-judicial process start immediately, and when it does commence who will be reviewing the complaint? For example, the Universal Fellowship of Metropolitan Churches (“UFMCC”) bylaws state that a judicial officer must first make a finding as to whether or not the allegations are sufficiently reliable to warrant further inquiry.¹³ After being presented with a claim, the Lutheran church conducts a review.¹⁴ The Presbyterian bylaws do not state what the process is once a complaint has been lodged. It is important to emphasize that the congregation should be encouraged to keep open minds toward the complainant and the accused until there has been a completed investigation.

It is also important that codes relating to this issue focus on each party's protection and fairness equally. For example, many codes assign an advisor to the parties to guide them through the process, but some codes do not do so. Others may provide this type of support to only one party. The Aleph code of the Alliance for Jewish Renewal provides for someone to assist the alleged perpetrator and someone who will work with the alleged victim.¹⁵ However, it is not enough that this type of support is provided in the code. The role of the supporter should also be clearly defined and equal support should be offered to each side.

If abuse occurs within major Jewish communities, neither the alleged victim nor the accused are routinely assigned someone to help guide them through the process.¹⁶ Similarly, Lutherans and Presbyterian codes fail to address this. Methodist bylaws speak of care/response teams but do not specify their purpose.¹⁷ Without specific requirements laid out requiring the assignment of support individuals as well as delineating their responsibilities, it appears that general statements in current codes have rarely led to the active inclusion of support persons in the adjudication process.

VirtusOnline recommends that Catholics provide limited assistance to victims, but are unclear as to whether there must first be a finding of guilt in order to receive the assistance. According to VirtusOnline pastoral, psychological and spiritual support should be offered to Catholic victims.¹⁸ There is also a lay assistance coordinator whose job is to "organize and direct outreach to victims and the delivery of victim assistance and support services to persons who claim to have been sexually abused when they were minors by a priest or deacon."¹⁹ It is unclear whether this type of support is only available to those abused as minors or includes those abused as minors in addition to other victims. The UFMCC only provides that pastoral care may be recommended for the complainants, the clergy charged and the impacted congregation or agency.²⁰ Other than that, no specific help is provided to guide parties through the proceedings.

When an advocate is only provided to one party, generally the alleged victim, the issue of procedural unfairness must be addressed. Is there a reason only one side receives this type of support and is this fair to the other side? Is the side that does not receive any assistance compensated in some way so as to reduce unfairness? It is important that the victim have someone to guide him/her through the process for a number of reasons. Whether the accused receives an advisor or not, those codes which do not assign an advisor to the victim to help them throughout the process are doing those victims an extreme disservice. This is because as an employee of the church, the clergyperson already has an advantage over the victim in terms of understanding the church's internal workings. Secondly, if the victim has a valid complaint, it is important that it not be lost in the shuffle. It must be correctly processed and heard by the appropriate people so that the clergyperson can be brought before the tribunal and decisions can be made about whether the clergyperson is capable of treatment and repentance and/or whether s/he should be removed from their position during treatment and repentance to avoid the risk of further abuse. These are all important issues for codes to address.

Another crucial issue to address is the part that a civil or criminal investigation or trial should play in the internal, religious investigation and proceedings. Some questions to address: Is a civil verdict or criminal conviction evidence of liability or guilt or does it necessitate a finding of liability or guilt by the religious institution? Will the parties be put through simultaneous trials/proceedings/investigations or will the church wait until the civil or criminal issues are resolved before pursuing its proceedings?

The suggested Catholic codes stipulate that they will not fully defer to a criminal investigation but will use every available means to continue their own investigation.²¹ This means that the parties may be put through the stress of having to endure dual investigations or trials/proceedings. Nevertheless, the code does provide that a criminal conviction is automatic grounds for dismissal of the clergy if the victim is a minor.²² The Aleph code requires that information of child abuse must be immediately reported by the chair of the ethics committee to the legal authorities. The UFMCC suspend their investigation until resolution of state or federal criminal charges and dictate that the judicial officer has the option of putting the clergy on inactive status during this time.²³ The codes for Unitarians, Presbyterians and Lutherans do not address the issue of the impact of a criminal trial in this manner. While there is also nothing written in

the Jewish codes/bylaws, the typical practice is to wait until a criminal investigation or trial is over. They may suspend the clergyperson during this time.²⁴

Many religious codes outline trial practices that resemble secular trials in some ways. Methodists have a panel of 13 pastors serve as a jury during a clergy trial and require a vote by nine of them to sustain the charges or convict.²⁵ Lutheran clergy trials are similar to secular trials in a number of ways. Each party has a representative, which may or may not be an attorney, and is allowed to present their case. Evidence and witnesses may be presented and cross examined. A verbatim record of the trial is kept. There are 12 voting members of the committee in front of which the trial is brought.²⁶ Like secular trials, VirtusOnline suggests that Catholic trials/investigations operate on a presumption of innocence but reserve the right to take immediate steps to protect the community. Further similarities include a prosecutor, a defense lawyer and an adversarial process in which witnesses may be tested through cross examination. Accused clergy will be asked to retain civil and canonical counsel.²⁷

The UFMCC may even forgo the investigatory process altogether, choosing instead to engage in a process of conflict intervention. It would appear that alternatives to the normal adjudicatory process may be considered when the clergy has fully acknowledged the violation(s) and a process of mediation may better serve the various parties (i.e. the victim(s), the congregation and the clergy perpetrator). As with many benefits of alternative dispute resolutions such as speedy resolution and confidential procedures, this may be appropriate in limited circumstances. However, if at the conclusion of this process it is determined that the matter has not been satisfactorily resolved, the investigation will then go forward. However, it is not clear what happens to the accused should they choose not to participate in the investigation/trial.

Many religious codes also allow for an appeal of the trial findings. Those that do should specify a number of things, including who will conduct the appeal, what exactly is to be reviewed on appeal, what the appeal is deciding and what the standard for appeal is. The Catholic review board sets its own standards and procedures for appeals and provides that both the victim and the accused should be advised on this procedure and how to initiate it.²⁸ Similar to criminal proceedings, they operate on a presumption of innocence.²⁹ The UFMCC does allow for appeals but it is unclear how this process is initiated or what the standard of appeal is.³⁰ UFMCC appeals are final unless the result is a revocation of clergy credentials.³¹

Additionally, there are legal problems that can stem from a lack of clarity in the codes. For example, many codes, such as the Unitarian and Jewish codes, do not specify the role of an attorney or other representation throughout their internal judicial process. This lack of specificity can lead to confusion and unnecessary disputes. The UFMCC provides that both parties are permitted to have an advocate present at the hearing but that the advocate is not legal counsel.³² The Lutheran codes provide that both parties may retain legal counsel and that if the accused is not found guilty, s/he is entitled to reimbursement of these fees.³³ Catholic codes state that any person may secure legal representation and that the accused is advised to do so, but the church will not pay for it.³⁴ Presbyterian codes state that “an attorney can discuss the legal aspects of the case.” These codes provide some requirements for the type of attorney that should be employed. However they do not explain the attorney’s role in terms of the investigation and trial. They also provide that if the accused is unable to employ an attorney, they may request appointment of counsel through the church.³⁵

Also, many religion’s codes, such as the UFMCC, Lutheran, Presbyterian, Unitarian and Jewish codes do not specify whom the complaint file is property of and with whom it can or must be shared. A file which alleges that abuse has occurred can create a liability if it falls into the wrong hands, as well as lead to possible privacy and libel issues down the line. It is vital to address the issue of who will have access to this type of information. Moreover, consideration of sharing information with other denominations or even unaffiliated congregations is not dealt with in current codes. This issue has arisen only on occasion and has been dealt with in an informal case by case situation.

Another topic which is not specified properly in many of the bylaws, is the issue of punishment. Are those clergy who are found liable or convicted removed from their role as clergy and if so for how long? How is the severity of the conduct addressed, if at all? Treatment options offered or suggested as well as what happens to them and their salary during this time should be addressed. There should also be

stated the procedure by which one may return to the church once treatment is completed, if they may return at all, and if undergoing a specific type of treatment is required first. Another very important issue is how one can be sure that treatment was effective and that these people will not prey on congregants again. These are all pertinent issues that should be addressed in a clear manner within religious bylaws so that the clergypersons are aware of the consequences of their actions and do not feel that they are being treated differently or unfairly because of the stigma associated with those actions.

It is interesting to note that none of the codes specify the use of psychological testing. At least one of the organizations appears to periodically recommend that a psychological evaluation be performed at the beginning of a rehabilitation process and again near its conclusion of the process to determine that treatment has been completed sufficiently to reasonably assume that the clergyperson will not reoffend in the future. The cost, stigma, and questionable reliability may have given pause to a wholesale requirement of such tests. However, psychological assessments can be valuable tools, especially when dealing with extreme cases where the future safety of congregants may be questionable.

If there is actual sexual misconduct occurring within a congregation, it is important that people believe that there is a trustworthy and fair procedure in place. Only if this is the case, will they feel comfortable enough to come forward so that the abuse can be stopped as soon as possible. The right bylaws and codes can greatly facilitate this process. Proper codes can be a great asset to the religious institution whereas improper or incomplete codes can be a huge liability. Moreover, when people know that the congregation has a policy against sexual misconduct and that they will be treated fairly, they are more likely to be comfortable coming forward. This is why it is so important for each religious group to develop codes which properly address all facets of clergy sexual misconduct, from defining what constitutes clergy sexual misconduct, guidelines for filing of the complaint, procedures for assistance, investigation, trial procedure, appeal from determination of culpability, appeal from determination of punishment and the possibility of reinstatement of the clergyperson.

While this article is only a beginning in the process of exploring the various procedures to deal with clergy sexual misconduct, it is a first step. It is our hope that additional articles will follow and that model procedures will be developed. In this way, we not only help each other to develop better codes, we help in the creation of safer boundaries that benefit our clergy, congregations, religious intuitions and especially our congregants.

Footnotes

¹ Richard Allen Blackmon, *The Hazards of the Ministry* (unpublished dissertation)

² Anne A. Simpkinson, *Soul Betrayal*, http://www.beliefnet.com/story/101/story_10199_1.html (last visited January 17, 2008).

³ Anne A. Simpkinson, *Soul Betrayal*, http://www.beliefnet.com/story/101/story_10199_1.html (last visited January 17, 2008).

⁴ Anne A. Simpkinson, *Soul Betrayal*, http://www.beliefnet.com/story/101/story_10199_1.html (last visited January 17, 2008).

⁵ Sex Between Therapists and Clients, <http://www.kspeope.com/sexiss/sexencyc.php>, (last visited February 22, 2008).

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⁷ <http://www.faithtrustinstitute.org/> (follow "About the Issues" hyperlink; then follow "Clergy Ethics & Sexual Abuse by Clergy" hyperlink; then follow "Q&A" hyperlink).

⁸ Issues surrounding clergy who are single entering into relationships with congregants are very complicated and risky but may, nevertheless be condoned under limited circumstances where there is not an overt power difference.

⁹ Virtusonline.org, *Model Policies and Procedures for Response to Allegations of Sexual Abuse*, <http://www.virtusonline.org/virtus/AllegationResponse.pdf> (last visited February 22, 2008).

¹⁰ Virtusonline.org, *Model Policies and Procedures for Response to Allegations of Sexual Abuse*, <http://www.virtusonline.org/virtus/AllegationResponse.pdf> (last visited February 22, 2008).

¹¹ Umsexualethics.org, *May I File a Report on the Misconduct?*, <http://www.umsexualethics.org/content.asp?pn=report> (last visited October 29, 2007).

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- ¹² Aleph.org, *Breach of Professional Trust: Sexual and Financial Ethics*, https://aleph.org/code_professional.htm (last visited January 20, 2008).
- ¹³ MCCChurch.org, *UFMCC Clergy Judiciary Process*, <http://www.mccchurch.org/oldintranet/clergy/UFMCCCLERGYJUDICIARYPROCESS.htm>
- ¹⁴ ELCA.org, *CONSTITUTIONS, BYLAWS, AND CONTINUING RESOLUTIONS Of the Evangelical Lutheran Church in America*, <http://www.elca.org/secretary/constitutions/ConstitutionsBylawsandContinuingResolutionsAugust2007.pdf> (last visited February 22, 2008).
- ¹⁵ Aleph.org, *Breach of Professional Trust: Sexual and Financial Ethics*, https://aleph.org/code_professional.htm (last visited January 20, 2008.)
- ¹⁶ **AGS email**
- ¹⁷ Umsexualethics.org, *What do these words mean?*, <http://www.umsexualethics.org/content.asp?pn=report> (last visited February 22, 2008).
- ¹⁸ Virtusonline.org, *Model Policies and Procedures for Response to Allegations of Sexual Abuse*, <http://www.virtusonline.org/virtus/AllegationResponse.pdf> (last visited February 22, 2008).
- ¹⁹ Virtusonline.org, *Model Policies and Procedures for Response to Allegations of Sexual Abuse*, <http://www.virtusonline.org/virtus/AllegationResponse.pdf> (last visited February 22, 2008).
- ²⁰ MCCChurch.org, *UFMCC Clergy Judiciary Process*, <http://www.mccchurch.org/oldintranet/clergy/UFMCCCLERGYJUDICIARYPROCESS.htm> (last visited February 22, 2008).
- ²¹ Virtusonline.org, *Model Policies and Procedures for Response to Allegations of Sexual Abuse*, <http://www.virtusonline.org/virtus/AllegationResponse.pdf> (last visited February 22, 2008).
- ²² Virtusonline.org, *Model Policies and Procedures for Response to Allegations of Sexual Abuse*, <http://www.virtusonline.org/virtus/AllegationResponse.pdf> (last visited February 22, 2008).
- ²³ MCCChurch.org, *UFMCC Clergy Judiciary Process*, <http://www.mccchurch.org/oldintranet/clergy/UFMCCCLERGYJUDICIARYPROCESS.htm> (last visited February 22, 2008).
- ²⁴ **AGS email**
- ²⁵ *Power of the trial court*, <http://archives.umc.org/interior.asp?ptid=3&mid=5724>, (last visited January 20, 2008.)
- ²⁶ ELCA.org, *CONSTITUTIONS, BYLAWS, AND CONTINUING RESOLUTIONS Of the Evangelical Lutheran Church in America*, <http://www.elca.org/secretary/constitutions/ConstitutionsBylawsandContinuingResolutionsAugust2007.pdf> (last visited February 22, 2008).
- ²⁷ Virtusonline.org, *Model Policies and Procedures for Response to Allegations of Sexual Abuse*, <http://www.virtusonline.org/virtus/AllegationResponse.pdf> (last visited February 22, 2008).
- ²⁸ Virtusonline.org, *Model Policies and Procedures for Response to Allegations of Sexual Abuse*, <http://www.virtusonline.org/virtus/AllegationResponse.pdf> (last visited February 22, 2008).
- ²⁹ Virtusonline.org, *Model Policies and Procedures for Response to Allegations of Sexual Abuse*, <http://www.virtusonline.org/virtus/AllegationResponse.pdf> (last visited February 22, 2008).
- ³⁰ MCCChurch.org, *UFMCC Clergy Judiciary Process*, <http://www.mccchurch.org/oldintranet/clergy/UFMCCCLERGYJUDICIARYPROCESS.htm> (last visited February 22, 2008)
- ³¹ MCCChurch.org, *UFMCC Clergy Judiciary Process*, <http://www.mccchurch.org/oldintranet/clergy/UFMCCCLERGYJUDICIARYPROCESS.htm> (last visited February 22, 2008)
- ³² MCCChurch.org, *UFMCC Clergy Judiciary Process*, <http://www.mccchurch.org/oldintranet/clergy/UFMCCCLERGYJUDICIARYPROCESS.htm> (last visited February 22, 2008)
- ³³ ELCA.org, *CONSTITUTIONS, BYLAWS, AND CONTINUING RESOLUTIONS of the Evangelical Lutheran Church in America*, <http://www.elca.org/secretary/constitutions/ConstitutionsBylawsandContinuingResolutionsAugust2007.pdf> (last visited February 22, 2008).
- ³⁴ Virtusonline.org, *Model Policies and Procedures for Response to Allegations of Sexual Abuse*, <http://www.virtusonline.org/virtus/AllegationResponse.pdf> (last visited February 22, 2008).

³⁵ Virtusonline.org, *Model Policies and Procedures for Response to Allegations of Sexual Abuse*, <http://www.virtusonline.org/virtus/AllegationResponse.pdf> (last visited February 22, 2008).