

March 4, 2021

Fathers and Brothers of the Great Lakes-Gulf Presbytery,

On February 8, 2021 six men sent the following petition to the 16 men who registered their complaint with synod regarding the decisions of the GLGP on October 23, 2020. We, the undersigned, bring our original petition plus the February 26, 2021 response of these 16 men.

We ask that this communication be forwarded to synod to be considered along with the other complaints related to the case. We have sought to deal with our brothers according to the principles of Matthew 18 which do not speak exactly to the specifics of such a situation. It is time to involve others in our objection, and it seems to us, in light of the current circumstances, that the best place to resolve these issues is at the synod level.

Respectfully submitted,

David Hanson  
James Faris  
Richard Holdeman  
Ray Morton  
Jason O'Neill

February 8, 2021

Dear Shawn Anderson, Robert Bibby, Kent Butterfield, G. Scott Damerow, Jon Hughes, Scott Hunt, Jason Camery, John Kim, Richard Knodel, Adam Kuenher, Robert McKissick, Phil Pockras, Jake Schwartz, Craig Scott, Tim Vincz, and Steven Work,

Dear Brothers in the Lord,

We have read with dismay your 286-page complaint to the RPCNA Synod against the Great Lakes-Gulf Presbytery for actions at the October 23, 2020, meeting in which our presbytery decided to give Mr. Michael LeFebvre his credentials. The first two pages of your complaint raise important procedural questions that are worthy of consideration. However, the next 23 pages of your document contain many offensive and uncharitable characterizations of your fellow presbyters. We, therefore, write to appeal to you as brothers in Christ to reconsider the approach you have taken in your complaint and to turn away from this unnecessarily divisive course of action.

While we agree in large measure on the doctrinal questions occasioned by the recent controversy in our presbytery, the complaint as written tends to pervert process, distort the record, and undermine the good name of your brothers. In candor, this approach has created a breach of trust that could impact the freedom and openness with which your brothers can work with you in the future. How can your brothers speak to you when they can only guess at how you might twist their words, impugn their motives, and insinuate their guilt to the wider church? This is not the way a presbytery should work. This is not the way of Christ.

Our concerns fall along two lines. First, the complaint, with its extensive documentation, reads more like a prosecutorial brief than an appeal. Litigation by appeal is a corruption of good order. Perhaps synod would agree that the trial should have been held. Perhaps then the prosecution could gain a hearing to try the case before synod. However, at present, the standing and authoritative decision of presbytery is that the case has been canceled. Even if you as complainants disagree with that action, it remains a fact that you, by your ordination vows, are obligated to honor the presbytery ruling. That ruling means that the former prosecutors cease to have any authority to prosecute the case.

Perhaps you can see, then, why the complaint as written is so distressing. It insinuates the guilt of a number of individuals without affording a ready means of defense. By publishing these pages, you have committed a breach of good order and have thus engaged to follow divisive courses of action. We write to state our offense and to call you to repentance before the Lord and his people.

Second, the offensiveness of the complaint as written is compounded by the inaccuracy of the narrative, which tends to valorize the prosecution and cast aspersions on those with whom the prosecution disagreed. The complaint is highly subjective and impugns the motives of many. It insinuates that various members of the presbytery may have sinned. Your complaint contains judicial allegations, assertions, and even presumed verdicts against not only Mr. LeFebvre, but many other presbyters, that are not appropriate outside of a judicial context. What is more, this complaint seeks to publish this distorted narrative to the whole denomination. Legitimate complaints and procedural questions are one thing. A cavalier disregard for the good name of your



brothers and carelessness regarding the truth are another thing entirely. Hence, we fear that the ninth commandment is violated many times over by this complaint as written.

In short, you have stirred up division and suspicion with your inaccurate, careless, and voluminous writing. Your narrative does not present a faithful and true picture of your brothers.

The items listed in the addendum to this letter illustrate why we think you have sinned against your brothers. The list is merely illustrative, not exhaustive. In our opinion, all 23 pages of the document (following the initial two pages) are so flawed that they must be withdrawn in their entirety; those pages will not be made pure with slight adjustments here and there. Indeed, there are more important matters of ministry to attend to than cataloging every offense contained in your complaint.

Seeking faithfulness to the process Jesus outlines in Matthew 18, we ask you brothers to repent of these writings and to retract them. We further urge you to publish your retraction and repentance as far as the document has spread. We pray that you would be convicted by the Holy Spirit and that you will take appropriate action. If you cannot agree to retract the complaint as written, we would appeal to each of you individually to seek forgiveness from those you've offended and to withdraw your support from the complaint in its current form.

We respect your right to complain against the two actions in the presbytery that you articulate at the outset of your document. We are willing to see the synod take up those complaints and give our presbytery guidance. Very little of your narrative is necessary to file your complaint. Your multiplication of words has created great offense that cannot go unaddressed. Our sincere desire in writing to you is to bring glory to Christ and to heal the unhealthy divide that has developed in our presbytery. Our prayer is that Jesus would be honored among us and that we would be able to move forward together, working in peace and harmony for the good of the church.

Sincerely in Christ,

David Hanson  
James Faris  
Rich Holdeman  
Ray Morton  
Jared Olivetti  
Jason O'Neill

#### **ADDENDUM:**

Examples of problems, errors, and offenses from your complaint that render it a misrepresentation of the truth and a maligning of your brothers:

- 1) p. 2, item #5.C: You presume the guilt and moral offensiveness of certain statements supporting Mr. LeFebvre's writings, thereby casting slander against the named men by publicly maligning them without following due process: "Allowing the written statements of certain RPCNA elders (e.g., Drs. Holdeman, McCullough, and Ophoff) in praise of Dr. LeFebvre's writings to go unopposed and unqualified by any clear public statement by presbytery condemning the specific list of contra-confessional teachings contained within

these writings, such that, through this neglect of duty, local RPCNA church officers and members remain vulnerable to the influence of this literature.”

- 2) p. 4, item #2: Your complaint cites, but fails to take seriously, Mr. LeFebvre’s stated reason for submitting pre-publication materials to various reviewers. Instead, you repeatedly describe those consulted as forming Mr. LeFebvre’s “inner circle” (a term used seven times on p. 4, 5, 6, 14, 22), as though these officers were collaborators in some sort of agenda. He was not forming an “inner circle” of collaborators, and it seriously misrepresents history to use the loaded term “inner circle” to describe those Mr. LeFebvre consulted. The men he consulted gave a variety of responses to his work and as they contemplated his unfolding work.
- 3) p. 4, footnote 13: You insinuate that the Christ Church elders and other elders in the presbytery aware of Mr. LeFebvre’s writing could be implicated as accomplices.
- 4) p. 4, footnote 13: You impugn the motives of and cast aspersion on Mr. Holdeman and Mr. Olivetti (and, perhaps, the Christ Church ruling elders who served as delegates at the October 23 presbytery meeting) when you write: “It is equally apparent to us that their decisive role [in a close vote] in halting a judicial process that might serve to highlight their own controversial role in the defendant’s allegedly censurable conduct, represents a rather staggering conflict of interest.” The preceding statement to the effect that these men are faithful brothers voting according to conscience does nothing to remove the offensiveness of the insinuation that ends the footnote.
- 5) p. 9, item #10: You claim that Mr. LeFebvre was unwilling “for nearly two years to inform the GLG of his exception” despite the fact that you were told on the floor of presbytery on October 23 that he was not aware that he had an exception to the system of doctrine of the RPCNA Testimony until much more recently when he did inform the presbytery. Of course, Mr. LeFebvre knew that he was not in full agreement with every part of the Testimony and in that sense took exception to certain language, but he did not believe he had any exception to our system of doctrine. The definition of what constitutes an exception to our system of doctrine is, of course, at the heart of the dispute, but you malign others when you are not even willing to fairly represent their own line of thinking.
- 6) p. 10, item #12: You state that Mr. Camery’s motion to release the RPTS review paper to the entire court, “... incited a lengthy and heated debate in which several delegates — some of whom had already read the paper and were highly critical of it — strongly opposed the idea of allowing the rest of the delegates to read it.” Your insinuation is that men with whom you disagree were trying to keep something from the rest of presbytery simply because it was critical of Mr. LeFebvre. You fail to mention that the only men who had read the report and objected to its release were members of the RPTS Board of Trustees, who knew that the report had not yet been vetted by the RPTS Board, which was to meet the following month. In actual fact some of these men were not “highly critical” of the report; they just did not think the timing of the release was appropriate. Your narrative distorts the truth and impugns the motives of these men.



- 7) p. 12, item #15: You implicitly criticize Mr. Faris and Mr. Holdeman for submitting an alternative proposal “just two days before the special meeting.” At the same time, it is not highlighted that the authors of the complaint executed a pre-planned strategy, bringing charges against Mr. LeFebvre on the floor of presbytery with no warning at all to the rest of the presbytery.
- 8) p. 12, item #15: The proposal of Mr. Holdeman and Mr. Faris is criticized for suggesting that Mr. LeFebvre should be given time to re-evaluate his positions in light of the presbytery committee’s decision not to allow him an exception to Testimony 4.4. Absent is any mention of Mr. Faris and Mr. Holdeman’s first recommendation: that the presbytery acknowledge Mr. LeFebvre is out of accord with RPT 4.4. The proposal affirmed the position of the church, and sought to strengthen it and give greater clarity to the whole church. Those elements were omitted from your narrative.
- 9) p. 13, item #16: You misrepresent the reason Mr. Kuehner and Mr. Anderson took the role of accusers at the Sept. 11 meeting of presbytery. According to your narrative, Mr. Kuehner and Mr. Anderson originally “urge[d] the presbytery to adopt formal charges against Mr. LeFebvre.” True. But the narration continues, “However, it soon became apparent that in order for the presbytery to charge Dr. LeFebvre, ‘the court itself must institute proceedings by appointing a special prosecutor to pursue the case’ (BOD II.1.3-4, E-9). Since this had not been done, it was generally agreed that the court should receive the charges from individual accusers.” That is not accurate. Mr. LeFebvre is the one who actually warned the court against this action. Your narrative seeks to smooth out the overall chaos of the actual situation. An accurate narration of this history is important, since it captures the fact that the chaos was real. The unwieldy process serves as a backdrop for other gaps and problems in the way the charges were formulated.
- 10) p. 15, item #18: With respect to the added witnesses, you state, “These additional witnesses included Joel Hart, Richard Holdeman, Jon Hughes, Michael LeFebvre (if willing to testify)...” As a point of fact, there was no “if willing to testify” provision in the prosecution’s request to the AIC, nor in the summons produced by the AIC. It was only after the defendant submitted a complaint to presbytery, noting the biblical and constitutional protections of a defendant from being compelled to testify against himself, that the prosecution amended their request to remove Mr. LeFebvre from their witness list and retroactively explained themselves as (always) intending for the defendant’s testimony to be voluntary. Your narrative rewrites history to smooth over this problem.
- 11) p. 18, item #20: You impugn Mr. LeFebvre’s motives and ignore the truth of his own words. You assert that Mr. LeFebvre did not attend the presbytery meeting on October 23 because he was motivated by a desire to avoid a trial: “The defendant’s decision to disobey the summons was a highly strategic maneuver” which you go on to say would allow efforts “to cancel the trial.” On the contrary, Mr. LeFebvre was quite willing for a trial, with the provisions and protections afforded by our Constitution. Mr. LeFebvre had articulated that his lawyer was unable to attend on that date. He had requested a new date, which was denied. Mr. LeFebvre notified presbytery he would not attend since he was being denied access to legal counsel, but that he would expect a second summons with a new date.



- 12) p. 19, item #22: You impugn Mr. Hanson's motives for calling a special meeting, and you insinuate that he deliberately timed calling the meeting for strategic purposes with the dramatic phrase "last possible moment" when you write: "Now, just a few hours away from the 10-day deadline for advance notice, at the last possible moment, the moderator called a special meeting, giving the court an additional opportunity to reverse course and halt the ongoing judicial process. Within a few days, the moderator also informed the AIC that Southside RPC would no longer be hosting the upcoming trial, leaving the AIC scrambling to find an alternate venue." Furthermore, your paragraph also defames Southside RPC by painting their decision regarding hospitality in this dramatic section.
- 13) p. 19-21, item #23: Mr. Niess and Mr. Hart brought a proposal to presbytery on Oct. 23 for a way forward that they argued would be "both biblical and just, while also avoiding the need for a trial." In their view, the direction they proposed would be "in the best interest of [every]one in the presbytery." Their priority was, as they stated, to offer a direction which was "both biblical and just," and which only secondarily would also spare the pain and expense of a trial. However, the complainants focus on that latter phrase ("avoiding the need for a trial") and the expression "best interest," and they, at times sarcastically, quote those phrases over and over in the narrative, characterizing the efforts of these men as a bald effort to avoid a trial purely for the sake of convenience. Furthermore, the complainants repeatedly point out a supposed lack of explicit Scripture references in the document and in floor debate as indication for the proposal's lack of biblical merit. However, not all biblically grounded arguments are presented with chapter and verse stated. The lack of explicit citation does not, in itself, indicate a proposal's lack of biblical merit. Likewise, the complainants repeatedly quote Mr. Hart and Mr. Niess's phrase "best interest" (five times on p. 19, 20, 24) as though it represents "lean[ing] on their own understanding" and following "personal preferences, friendships, and pragmatic 'best interest'" rather than Scripture and church order.
- 14) p. 20, item #23 (and on page 15): You characterize Mr. LeFebvre's request to be granted his credentials, and the motion by Mr. Niess and Mr. Hart, as a desire to make use of DCG 3.II.E.5.i as a "convenient escape clause" to avoid discipline and a hard trial. But, you overlook that Mr. LeFebvre had believed he was within the bounds of his ordination vows prior to the September 11, 2020 meeting when presbytery ruled that certain of his views are out of accord with the ordination vows. After that meeting, he took two steps: he resigned from the pastorate; and, in the same September 20 notice to presbytery, he stated his conscientious obligation to withdraw from the RPCNA. Both decisions were made with the same motive: to honor the vows. None were looking for a "convenient escape" but rather the best way to honor our vows to the Lord and his church.
- 15) p. 21, footnote 45: You were frustrated with the delayed completion of meeting minutes. However, it is uncharitable and unnecessary to document that frustration for the attention of the full synod, with such expressions of dismay against the clerk pro tem (Mr. Morton) and the moderator (Mr. Hanson) by name.

- 16) p. 22, item #24: The complainants further cast doubts on the integrity of the entire presbytery—or at least all those in the majority on a certain vote: “There is evidence suggesting all four of these men (and perhaps others who voted in the majority) were among the defendant’s inner circle of counselors leading up to the publication of his views.” This is a weighty charge of a lack of integrity against fellow presbyters, and is unworthy of publication in this manner. Such allegations ought either to be kept to oneself, or handled through due process (Matt. 18).
- 17) p. 22, item #24: (last paragraph), the complainants describe the debate over whether or not to grant Mr. LeFebvre his credentials this way: “The constant (if not exclusive) refrain in the speeches favoring the motion to grant credentials was the need to cancel the trial and end the disciplinary process. To our recollection, not a single Scripture reference was cited in favor of granting credentials, whereas numerous Scriptures were cited against it.” This description is insufficient, inaccurate, and an ungenerous summary of the arguments of those supporting the motion. The primary argumentation for the motion was that the DCG allows a presbytery to release a minister’s credentials.
- 18) p. 21, item #24: You defame Mr. Hanson, the presbytery moderator, by inferring bias and impropriety on Mr. Hanson’s part in sustaining the wording of his own edict, even while you note that presbytery specifically voted that he had acted properly in the matter at hand.
- 19) Throughout the document, you use language to present one side as acting in a decisive, faithful, principled manner while the other side is presented as sloppy, confused about our standards, unprincipled, and disagreeable.

Consider the way the various writings and speeches of Mr. Kuehner are represented in positive ways:

- “express[ing] his appreciation” (p. 7),
- “shar[ing] his respectful disagreement” (p. 7),
- “abid[ing] by a list of ground rules” (p. 7),
- “need[ing] to submit a paper to presbytery” (p. 7),
- “summarizing and analyzing key aspects” (p. 10),
- “sp[eaking] strongly against this recommendation” (p. 13),
- “urging the presbytery ... pursuant to a fair trial” (p. 13),
- “rather than hastily condemning a brother” (p. 13),
- “sent a letter to the AIC noting their constitutional right” (p. 15),
- “expressed his concern” (p. 15),
- “in order to be on the safe side” (p. 15),
- “[offer[ing]] a rather mild statement” (p. 16),
- “a 7-page letter ... carefully refuting..., exposing..., and serving to vindicate” (p. 16),
- “willing to consider” (p. 17),
- “reached a verbal agreement” (p. 17),
- “clarifying” (p. 18),
- “issued a 12-page reply..., carefully refuting..., and identifying...” (p. 18),



- “after receiving counsel from some older, wiser ministers in the denomination, they determined to avoid taking a shortcut” (p. 18),
- “went ahead and petitioned the AIC on the defendant’s behalf” (p. 19),
- “raised a point of order” (p. 21),
- “argued” (p. 21),
- “suggested” (p. 21),
- “Immediately raised a point of order (in writing)” (p. 22),
- “raised a second point of order (in writing)” (p. 22), and
- “implemented the decision of the court” (p. 23).

Now consider how the various writings and speeches of the defense and others are repeatedly characterized in negative (at times maligning) terms:

- “expressed his unwillingness” (p. 1),
- “dangerous, divisive, and unbiblical teachings” (p. 2),
- “Dr. LeFebvre ... circumvented it” (p. 4),
- “the author’s rather spirited attack” (p. 5),
- “he accuses” (p. 5),
- “perhaps most troubling of all, Dr. LeFebvre asserts” (p. 6),
- “this uncharacteristically aggressive style of rhetoric” (p. 6),
- “Dr. LeFebvre laments” (p. 9),
- “in defense of his unwillingness” (p. 9),
- “Communication 20-1 sent shockwaves throughout the GLG” (p. 10),
- “heated debate in which several delegates ... strongly opposed the idea of allowing the rest of the delegates to read it” (p. 10),
- “as advertised, the post reiterates Dr. LeFebvre’s contra-confessional outlook” (p. 11),
- “he scolded the court” (p. 12),
- “he then proceeded to impugn..., insinuating...” (p. 12),
- “he claimed” (p. 12),
- “he insisted” (p. 12),
- “Dr. LeFebvre also criticized...” (p. 12),
- “Rev. Chellis issued an inflammatory 5-page letter” (p. 16),
- “Dr. LeFebvre appears to have been unhappy” (p. 17),
- “within 24 hours, he had vetoed..., cut off..., and released...” (p. 17),
- “Dr. LeFebvre addressed a second letter .... reiterating” (p. 17),
- “Dr. LeFebvre takes aim at the prosecutors” (p. 17),
- “Dr. LeFebvre accuses” (pp. 17-18),
- “Dr. LeFebvre informs the court of his intention to disobey” (p. 18),
- “the defendant’s litany of motions” (p. 18),
- “the defendant couches his disobedience” (p. 18),
- “Dr. LeFebvre’s decision to disobey ... was a huge blow” (p. 18),
- “Revs. Hart and Niess demonstrate further confusion” (p. 21),
- “not a single Scripture reference was cited” (p. 22), and so on.



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*From your brethren in the Great Lakes-Gulf Presbytery:*

SHAWN ANDERSON ROBERT BIBBY KENT BUTTERFIELD JASON CAMERY G. SCOTT DAMEROW  
JON HUGHES SCOTT HUNT JOHN KIM RICHARD KNODEL ADAM KUEHNER ROBERT MCKISSICK  
PHIL POCKRAS JAKE SCHWARTZ CRAIG SCOTT TIMOTHY VINCZE STEVEN WORK

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February 26, 2021

To: Rev. David W. Hanson, Rev. James I. Faris, Rev. Dr. Richard B. Holdeman, Rev. Raymond Morton, Rev. Jared Olivetti, and Elder Jason O'Neill

Rev. James I. Faris  
4134 Sunmeadow Lane  
Indianapolis, IN 46228

Dear Brethren,

Greetings in the name of our Lord and Savior, Jesus Christ!

Thank you for sending us your letter. We have considered each of your concerns carefully and want to reaffirm our genuine love for each of you.

According to the RPCNA Book of Discipline II.4.3 (E-15), we are required to “file the same with the higher court” (i.e. the same complaint filed with the presbytery before the 30-day deadline, not a revised complaint). Therefore, it is too late for us to make any changes to the content of our complaint.

It seems clear that your interpretation of our complaint (and of the events surrounding the recent LeFebvre controversy) is somewhat different from ours. We do not believe that these differences of opinion warrant an accusation of sin.

The appropriate venue for resolving this matter is on the floor of this year's synod.

Sincerely,

Shawn Anderson  
Robert Bibby  
Kent Butterfield  
Jason Camery  
G. Scott Damerow  
Jon Hughes  
Scott Hunt  
John Kim  
Richard Knodel  
Adam Kuehner  
Robert McKissick  
Phil Pockras  
Jake Schwartz  
Craig Scott  
Timothy Vincze  
Steven Work