

To Adam M. Kuehner, Clerk of Great Lakes Gulf Presbytery of the Reformed Presbyterian Church of North America:

And now, this twenty-first day of April A.D. 2023, comes Gary V. Allison and complains against the action of the Session of Southfield Reformed Presbyterian Church on April 21, 2023, to proceed to trial and conduct a trial contrary to Directory for Church Government 4.9 (D-29), The Book of Discipline, and Ordination Vow 9 (G-3), which are based upon the principles of truth and due process taught in Holy Scripture, the Westminster Confession of Faith, the Larger and Shorter Catechisms, and the Testimony of the Reformed Presbyterian Church (cf. A-88).

In bringing this complaint I affirm that I believe that the Session has erred and that this error is serious; that I have tried to understand the Session's point of view; that I have seriously examined, in prayer before the Lord, my willingness to be in subjection to my brothers in Christ; and that I have made a serious effort to correct the error short of entering a complaint.

In support of this complaint I set forth the following grounds:

1. The Session initiated and conducted a trial contrary to the rules set forth in the Book of Discipline as required in Directory for Church Government 4.9, "All judicial action affecting the standing of the members of the congregation shall be initiated in the session, and the trial shall be conducted in accordance with the rules set forth in the *Book of Discipline*."
2. The Book of Discipline requires that the Session "shall name the specific offense, the time, place and circumstances of its commission" (The Book of Discipline II.2.1, E-10), but the Session has not given the time, place, and circumstances of any specific instance of any offense.
3. The Book of Discipline requires that "if additional witnesses or new evidence are discovered, the accused shall be informed and further time given him or her to prepare a defense," but the Session provided new evidence two days before the trial without giving further time to prepare a defense.
4. The Book of Discipline requires that "the Presbyterian form of government provides for a gradation of courts whereby the lower is answerable to the higher. A decision of the lower court is subject to review and correction by a higher court. Any member of the church may carry his case through the lower courts even to the highest court for adjudication" (I.5, E-7), "a decision of the lower court is subject to review and correction by a higher court. Any member of the church may carry his or her case through the lower courts even to the highest court for adjudication," and "The action of an inferior court may be brought under the judgment of a higher court by Review of the Records, Complaint, Reference, or Appeal" (II.4.1, E-15), but the Session initiated and conducted a trial in spite of the fact that a complaint was brought within 30 days against the Session's decision on March 19 to hold a trial, and in spite of the fact that a complaint against the Session's decision to issue an accusation of sin and schedule a trial was appealed to Synod, and in spite of the fact that a

complaint was brought against the decision of the Presbytery on March 3, none of which have been adjudicated.

5. The Book of Discipline requires that “the lower court shall transmit to the higher all records and papers pertaining to the case. If this is not attended to, the higher court may reprove the lower for its negligence and postpone the hearing until these documents have been received” (The Book of Discipline II.4.4, E-16), but the Session initiated and conducted a trial rather than allowing its decision to be reviewed first by the higher court.
6. The Book of Discipline requires that the accused be able to have counsel and witnesses present during a trial, but the Session initiated and conducted a trial without any counsel or witnesses for the accused present because the accused understood that the complaints and the appeal must be adjudicated before a trial can properly be held, but the minister and elders of the Session informed the accused that the complaints and appeal had been received, and then insisted on holding the trial before their adjudication and at a time when counsel and witnesses for the accused were not able to be present and without any regard for these serious violations of due process as set forth and required in the holy Law of God, the confessional standards of the church, and The Book of Discipline.
7. The minister and elders of the Session have violated their solemn ordination vow in which they promised “subjection in the Lord to the courts of this church,” and engaged “to follow no divisive courses from the doctrine and order which the church has solemnly recognized and adopted” (Ordination vow 9, G-3).
8. The Session acted unlawfully by denying my right to appeal my complaint against the Session to Synod, thus usurping the authority of Synod to receive and consider the appeal of my complaint, contrary to The Book of Discipline I.5, E-7, and II.4.1, E-15.
9. The Session acted unlawfully by asserting that my appeal of a complaint is unrelated to Session’s summons to conduct a trial, when my appeal of a complaint seeks to have the Session acknowledge and follow the requirements of the Bible, the confessional standards, the Book of Discipline, and the Testimony of the Reformed Presbyterian Church, which states that the power of governing the church “is moral and spiritual, and subject to the law of God” (A-88).
10. The Session acted unlawfully by denying any irregularity in its proceedings when the Session’s actions violate the law of God, The Book of Discipline, and due process by initiating and conducting a trial when there are complaints and an appeal of a complaint concerning the trial that have not been adjudicated as required and no counsel and witnesses for the accused were able to be present.
11. The Session acted contrary to I Corinthians 14:40, “Let all things be done decently and in order,” by initiating and conducting a trial without due process as though there were a different means to uphold the truth than the holy Law of God, which shines the light of God that exposes the deeds of those who practice evil. The Lord Jesus Christ, the King and Head of the church, said, “But he who does the truth comes to the light, that his deeds may be clearly seen; that they have been done in God” (John 3.21).

I humbly ask the Presbytery to annul or reverse the action of the Session of Southfield Reformed Presbyterian Church on April 21, 2023, to proceed to trial and conduct a trial contrary to Directory for Church Government 4.9 (D-29), The Book of Discipline, and Ordination Vow 9 (G-3), which are based upon the principles of truth and due process taught in Holy Scripture, the Westminster Confession of Faith, the Larger and Shorter Catechisms, and the Testimony of the Reformed Presbyterian Church (A-88).


_____, Complainant
Gary V. Allison

Date: April 21, 2023