Where Christ is the center of it all

January 12, 2023

Dear Fathers and Brethren:

The Southfield RPC Session hereby transmits the attached complaint to presbytery. We welcome presbytery's involvement in this case, and have postponed the trial until after the spring meeting. If further comment is needed regarding the substance of the complaint, we are happy to share additional details at the meeting. However, in order to protect the complainant's public reputation, we would prefer to share these details either in executive session or to a committee/commission appointed by the court to adjudicate this matter.

The SRPC Session Elder Jon Hughes (clerk) Elder John Kim Pastor Adam Kuehner (moderator)

Gary V. Allison 4848 Fairway Ridge South West Bloomfield, MI 48323

January 3, 2022

Dear Session of Southfield Reformed Presbyterian Church,

I hereby complain to the Presbytery within 30 days against Session's December 8, 2022 decision. I humbly submit the enclosed complaint with grounds to the Moderator and Clerk of Session (The Book of Discipline II.4.3).

In accord with the Directory for Church Government Chapter 8, Section 11, I humbly submit to the Session this complaint addressed to the Presbytery against the Session, and I request the Session transfer this complaint to the Presbytery.

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With brotherly love, Gary V. Allison

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

And now, this thirtieth day of December A.D. 2022, comes Gary V. Allison and complains against the action of the Session of Southfield Reformed Presbyterian Church on December 8, 2022, to issue an accusation of sin and schedule a trial for Saturday, January 21, 2023.

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:

- The charge alleges five ways that I have sinned against God but does not state one specific instance and the "time, place and circumstances of its commission" as required in The Book of Discipline II.2.1. In addition, both Form 21 and Form 22 (H-20 and 21) require that a charge or accusation of sin give specific instance and the date on which a person has sinned against God.
- 2. The evidence for the alleged charge is a list of family members and one ruling elder who are not witnesses of the things alleged. One family member requested to testify is not a Christian and has lived elsewhere for many years with little contact. None of the witnesses listed has followed Matthew 18:15–17 and personally brought these allegations to me as our Lord requires and which is the "orderly manner for dealing with sin in His church" (The Book of Discipline, I.1.2 and I.2.1–4).
- 3. These allegations are based on false things my wife says in her sinful opposition to my patient and loving guidance and direction for daily living, including family worship, eating as a family, financial stewardship, education of our children, and entertainment, but the Session has not investigated the allegations as required in The Book of Discipline I.3.2. If the Session properly investigated these allegations, it would find that she has been disregarding and violating the moral law as it is taught in Scripture and by the church and as I have lovingly brought to her attention (The Book of Discipline I.1.6). Leviticus 19:15; Deuteronomy 1:16–17, 16:18–20; Psalm 45:6–7; Proverbs 24:23–26; John 7:24; I Timothy 3:15; Hebrews 1:8–9. Larger Catechism #144–145.
- 4. The Session has brought a charge based on false statements from my wife, "who manifests malice" toward me consistently, both privately and openly in the presence of our children, which The Book of Discipline II.1.2 forbids.
- 5. The Session has instituted formal process without evidence being presented that the means of reconciliation referred to in The Book of Discipline section 1, chapter 2 have been tried as required in The Book of Discipline II.1.1.
- 6. The Session has instituted formal judicial process without "evidence sufficient to warrant a trial" and without determining that "Christ's rule (Matt. 18:15–16) has been followed," both of which are required in The Book of Discipline II.2.2.

7. Requiring family members to testify against the head of the family concerning matters of which they have no knowledge, is not right and will harm the family instead of strengthening it, which can only be done by addressing the actual sins, which the Session has ignored.

I humbly ask the Presbytery to annul or reverse the action of the Session of Southfield Reformed Presbyterian Church on December 8, 2022, to issue an accusation of sin and schedule a trial without following the requirements of the Bible, our confessional standards, and The Book of Discipline.

Cary V. Allison , Complainant

Date: December 30, 2022

Southfield Reformed Presbyterian Church Minutes of the Session

April 1, 2018

The Session of the Southfield Reformed Presbyterian Church met on the Lord's Day, April 1, 2018 at 3:30 p.m. at the church.

- 1. Elders present were the Moderator Adam Kuehner, the Clerk Jon Hughes and John Kim.
- 2. The Moderator constituted the court in prayer.
- 3. The Allison family was interviewed for membership:
 - a. The family consists of Gary and Edee and their children Taralah, Shayna, Kaelyn, Charlotte, Kathryn and Stephen. They were formerly members of Hope Protestant Reformed Church, Redlands, CA. Gary, Edee, Taralah, Shayna and Kaelyn were communicant members at Hope PRC and Charlotte, Kathryn and Stephen were baptized members. We had received letters of dismissal and baptism certificates from Hope PRC.
 - b. It was previously noted that Gary had been censured by Hope PRC for some physical abuse of his wife more than three years ago. The censure itself was more than two years ago. The Session having met with Gary and Edee several times prior were satisfied that there has been true repentance and no repeat offenses and concluded that the censure could be lifted.
 - c. The Session heard professions of faith from all of the Allisons, including Charlotte but not the two youngest, Kathryn and Stephen, and asked questions regarding the nature of their faith, church membership and the sacraments and received answers.
 - d. Pastor Kuehner asked them (except the two youngest) the terms of the Covenant of Church Membership and they answered in the affirmative.
 - e. It was moved, seconded and passed to receive Gary, Edee, Taralah, Shayna, Kaelyn, and Charlotte as communicant members and Kathryn and Stephen as baptized members.
 - f. The Session extended the right hand of fellowship to the Allison family.
- 4. It was moved, seconded and passed to adjourn. John Kim adjourned the court in prayer at 4:37 p.m.

Adam Kuehner, Moderator

Jon Hughes, Clerk

Southfield Reformed Presbyterian Church Minutes of the Session

February 6, 2022

The Session of the Southfield Reformed Presbyterian Church met on the Lord's Day, February 6, 2022 at the church.

- 1. Elders present were the Moderator Adam Kuehner, the Clerk Jon Hughes and John Kim.
- 2. The Moderator constituted the court in prayer at 9:27 a.m.
- 3. The Session interviewed Jordan (J.C.) Fernandez for Communion. Jordan is a communicant member of Merriman Rd. Baptist Church in Garden City, MI. Jordan shared how the Lord drew him to Himself and enabled him to see the holiness of God and his need of repentance and a renewed mind. The Session members asked J.C. other questions regarding the gospel and the nature of the Lord's Supper.
- 4. It was moved, seconded and passed to welcome J.C. to the Lord's Table.
- 5. J.C. left the meeting.
- 6. It was moved, seconded and passed to remove communicant member Lillie Vue and the Mann family (communicant members Adam and Ixtel and baptized members Adam and Natalia) from the roll since they have joined other churches.
- 7. It was moved, seconded and passed to approve letters to Gary and Edee Allison. The letters follow these minutes.
- 8. It was moved, seconded and passed to adjourn. John Kim adjourned the court in prayer at 9:48 a.m.

Adam Kuehner, Moderator

Jon Hughes, Clerk

Where Christ is the center of it all

February 6, 2022

To our beloved sister in the Lord, Edee Allison:

It is with a deep sense of urgency that we must counsel you in the name and by the authority of our Lord and Savior Jesus Christ, to begin meeting regularly with Laura Kim for Biblical counseling, accountability, and prayer, in order to help overcome your admittedly sinful patterns of communication with your husband, as well as your confessed desire to leave your husband in response to his sinful behavior (detailed in our letter of rebuke), yet apart from any allegation of physical adultery, physical desertion, or physical danger.

We recognize that your husband's conduct has prompted you and many of your children to question his spiritual condition. However, we would urge you to consider the following Biblical exhortations to Christian wives who find themselves married to unbelieving, disobedient, unconverted husbands.

1 Cor. 7:10 Now to the married I command, yet not I but the Lord: A wife is not to depart from her husband. ¹¹ But even if she does depart, let her remain unmarried or be reconciled to her husband. And a husband is not to divorce his wife. ¹² But to the rest I, not the Lord, say: If any brother has a wife who does not believe, and she is willing to live with him, let him not divorce her. ¹³ And a woman who has a husband who does not believe, if he is willing to live with her, let her not divorce him. ¹⁴ For the unbelieving husband is sanctified by the wife, and the unbelieving wife is sanctified by the husband; otherwise your children would be unclean, but now they are holy. ¹⁵ But if the unbeliever departs, let him depart; a brother or a sister is not under bondage in such cases. But God has called us to peace. ¹⁶ For how do you know, O wife, whether you will save your husband? Or how do you know, O husband, whether you will save your wife?

1 Pet. 3:1 Wives, likewise, be submissive to your own husbands, that even if some do not obey the word, they, without a word, may be won by the conduct of their wives, ² when they observe your chaste conduct accompanied by fear. ³ Do not let your adornment be merely outward—arranging the hair, wearing gold, or putting on fine apparel— ⁴ rather let it be the hidden person of the heart, with the incorruptible beauty of a gentle and quiet spirit, which is very precious in the sight of God. ⁵ For in this manner, in former times, the holy women who trusted in God also adorned themselves, being submissive to their own husbands, ⁶ as Sarah obeyed Abraham, calling him lord, whose daughters you are if you do good and are not afraid with any terror.

We grieve with you at the great burden which the Lord has placed upon you in your present situation, and desire to help you bear that burden through ongoing prayer, counsel, and encouragement. If you or your children ever believe yourselves to be in physical danger, we urge you to let us know immediately, in addition to taking all other necessary precautions. You have assured us that this is not the case and that no physical abuse has occurred for many years. Still, we sympathize with your situation and desire to provide help and support whenever and wherever possible.

At the same time, we would also remind you that God himself has placed you in this situation for the purpose of teaching you Christ-like obedience (Rom. 8:28-29; Heb. 5:8; 12:11), and that He "is faithful, who will not allow you to be tempted beyond what you are able, but with the temptation will also make

the way of escape, that you may be able to bear it" (1 Cor. 10:13). Most importantly, He will never leave you nor forsake you in your trial (Ps. 23:4; Heb. 13:5-6).

We are praying for you and for your ongoing meetings with Laura, that the Lord would draw near to you by his word and Spirit, giving you the mind of Christ. We will also be receiving regular progress reports from Laura, in order to confirm that you are (1) making diligent use of the counseling sessions, (2) completing the homework assignments, and (3) making genuine progress in your battle against sin. This letter of counsel is not a formal disciplinary action. However, if, at any point, we cannot confirm all three of the factors listed above, the next step could involve a formal censure of admonition or rebuke.

In addition, we would urge you to consider that, in all likelihood, your own sinful dishonesty has played a major part in your family's spiritual decline, in that you reportedly made false statements to a civil magistrate in California to cover up Gary's sins against the family. Then, having moved to Michigan, you misled our session in your membership interview, claiming that Gary had truly repented of all the sins for which he had been under discipline, which we now know is *not* your genuinely held perspective.

Sin has consequences. Rather than focusing on *Gary's* sins, we would urge you to fix your eyes upon Jesus Christ and, by His grace, to declare war on *your own* sins, submitting to your husband with a respectful attitude, and bringing forth the spiritual fruit of self-control. That way, rather than making the problems in your marriage and family worse, you will function as a dynamic instrument of God's sovereign grace in the life of your husband, and set a godly example for your children. Most importantly, you will bring honor and glory to God by reflecting "the incorruptible beauty of a gentle and quiet spirit, which is very precious in the sight of God" (1 Pet. 3:4).

With Sincere Love in our Lord Jesus Christ, The SRPC Session Elder Jon Hughes (clerk) Elder John Kim Pastor Adam Kuehner (moderator)

Where Christ is the center of it all

February 6, 2022

To our beloved brother in the Lord, Gary Allison:

It is with great sorrow that we must rebuke you in the name and by the authority of our Lord and Savior, Jesus Christ, for your persistent refusal to respond in Biblical repentance to the habitual sin of failing to love, cherish, nourish, lead, and instruct your wife and children in the Lord (Eph. 5:25-33; 6:4; 1 Tim. 5:8; 1 Pet. 3:7), as evidenced in the following observations:

(1) After years of refusing your wife full access to the family finances, and six months of pressure from the session, you have only now finally granted Edee access to a debit card, which still falls far short of the "one flesh" unity of the marriage relationship as designed by God (Gen. 2:24; 1 Cor. 7:4; 1 Pet. 3:7).

(2) Rather than taking ownership for your own part in the family's accumulation of sizable consumer debt, you have continually sought to blame your wife and children for the debt problem, despite their highly limited access to family funds in comparison with yourself (Gen. 3:12).

(3) Rather than supporting your family using the income from your current job (plus your military pension), you put Edee in a situation wherein she was forced to get a part time job and to rely on regular financial assistance from her children in order to cover basic expenses (1 Tim. 5:8).

(4) Rather than acting as the spiritual head of your home by leading your wife and children in daily family worship, you have neglected the consistent performance of this vital responsibility for years, contributing to numerous spiritual problems in your home (Gen. 18:19; Eph. 6:4).

(5) Rather than making it a priority to maintain your home as a suitable and functional living space for your wife and children, you have engaged in many other projects and activities outside the home while important projects and repairs inside the home remain unfinished (Eccl. 10:18).

(6) Your unilateral, last minute decision in January to remove Stephen from school, thereby requiring Edee to homeschool him without first seeking and obtaining her consent, demonstrates the same lack of communication, transparency, and cooperation that we had just warned you about (11/13/21), stressing that if you continued to rule your household in this manner, discipline would follow (1 Tim. 3:4, 12).

We urge you to examine yourself in light of God's word and to bring forth the genuine fruits of repentance in these areas, recognizing that your ongoing neglect of your family has not only provoked them to wrath, but is greatly displeasing to the Lord Himself.

If you do not begin producing the visible fruits of true repentance in each of these areas in the coming months, we will be forced to consider further disciplinary action, which could include a public suspension from the privileges of communicant membership.

With Sincere Love in our Lord Jesus Christ, The SRPC Session Elder Jon Hughes (clerk) Elder John Kim Pastor Adam Kuehner (moderator) Adam Kuehner, Moderator

Jon Hughes, Clerk

Southfield Reformed Presbyterian Church Minutes of the Session

October 27, 2022

The Session of the Southfield Reformed Presbyterian Church met on the Thursday, October 27, 2022 at the church.

- 1. Elders present were the Moderator Adam Kuehner, the Clerk Jon Hughes and John Kim.
- 2. Pastor Kuehner led devotions from Psalm 15.
- 3. The Moderator led in prayer and constituted the court in prayer at 5:49 p.m.
- 4. The minutes of the September 1, September 4 and September 11, 2022 Session meetings were read and approved.
- 5. By common consent it was approved for Reuel Xavier (student from PRTS) or Pastor Namsik Yang be pulpit supply options for November 27 and either December 25 or January 1, 2023, with some details to still be worked out.
- 6. The elders gave reports on meetings with those in their shepherding groups and there was discussion regarding some others who may be seeking membership in the future.
- 7. It was noted that our Security Team hosted another meeting on the previous evening to help prepare the congregation on how to respond in an active shooter situation, if one should arise. Also covered was preparation for purchasing a full trauma kit and a defibrillator (and future training for those) for emergency situations. By common consent it was agreed that up to \$3000 can be spent on those items.
- 8. There was follow up on the congregational survey regarding use of church funds toward building/property issues including an option for replacing the pews in the auditorium.
- 9. By common consent a few minor changes/clarifications to the Congregational Protection Policy were approved.
- 10. In the absence of those ready and willing to be elected as deacons, the Session will attempt to appoint a Diaconal Task Force, to be overseen by the session as a proactive step toward electing future deacons.
 - a. Appointees would serve as diaconal interns under the oversight of the session, with specific session-delegated responsibilities corresponding with some of the categories noted in DCG 3.III.B (D-23) e.g. assisting with mercy ministry and property maintenance, attending budget meetings, assisting treasurer as needed similar to a pastoral internship for a student under care.

- b. Appointees would be encouraged to attend the first half of each session meeting, with the caveat that all sensitive shepherding details would be addressed at the end of the meeting, after their departure.
- c. Appointees would be actively mentored by the session in those areas where they may require growth/development in order to prepare/qualify them for future service as an ordained deacon.
- 11. It was moved, seconded and passed to send a letter of Accusation of Sin to Gary Allison via registered mail. The letter is below.
- 12. There was discussion regarding those who have attended very few services and/or the sacraments for nearly two years, despite repeated efforts to counsel/exhort them in that area.
- 13. The Session engaged in a time of prayer for various individuals and families of the congregation and Pastor Kuehner adjourned the court in prayer at 8:08 p.m.

Adam Kuehner, Moderator	Jon Hughes, Clerk

Where Christ is the center of it all

October 27, 2022

To our beloved brother in the Lord, Gary Allison:

It is with great sadness that we must bring to your attention the following disciplinary charges, by way of a formal accusation of sin.

ACCUSATION OF SIN

We, the Session of the Southfield Reformed Presbyterian Church, do hereby formally charge and accuse you, Mr. Gary V. Allison, of a grave and censurable offense against God's moral law; namely, <u>your long and stubborn persistence in the harmful neglect of your wife and children</u>, as manifested in the following ways.

(1) Neglecting for many years to provide for the spiritual wellbeing of your wife and children by leading regular daily family worship and carefully overseeing their discipleship, by way of teaching and example, in Christian faith and practice.¹

(2) Neglecting to provide for the temporal wellbeing of your family² by

- (A) Denying your wife full access to nearly all the family finances for many years, thereby forcing her to rely upon outside income and tempting her to abandon all trust and reliance upon you;
- (B) Failing to provide your son with a high school education this fall until late October, despite repeated requests from your wife and son, and without adequate explanation or subsequent repentance; and
- (C) Failing to provide a conducive living space for your family, as evidenced in the perpetually unfinished home remodeling projects which have, for many years, greatly inconvenienced and exasperated your children, during which time you have found ample opportunity for other projects and activities outside the home.³

(3) Neglecting to cultivate and maintain your "one flesh" marital unity⁴ by(A) Denying your wife full access to nearly all the family finances, as noted above;

¹ <u>Gen. 18:19</u> For I have known him, in order that he may command his children and his household after him, that they keep the way of the LORD, to do righteousness and justice, that the LORD may bring to Abraham what He has spoken to him <u>Deut. 6:7</u> You shall teach them diligently to your children, and shall talk of them when you sit in your house, when you walk by the way, when you lie down, and when you rise up. <u>Eph. 5:25-27</u> Husbands, love your wives, just as Christ also loved the church and gave Himself for her, that He might sanctify and cleanse her with the washing of water by the word, that He might present her to Himself a glorious church, not having spot or wrinkle or any such thing, but that she should be holy and without blemish. <u>Eph. 6:4</u> And you, fathers, do not provoke your children to wrath, but bring them up in the training and admonition of the Lord.

 $^{^2}$ <u>1 Tim. 5:8</u> But if anyone does not provide for his own, and especially for those of his household, he has denied the faith and is worse than an unbeliever. <u>Eph. 5:28-29</u> So husbands ought to love their own wives as their own bodies; he who loves his wife loves himself. For no one ever hated his own flesh, but nourishes and cherishes it, just as the Lord does the church.

³ Eccl. 10:18 Because of laziness the building decays, and through idleness of hands the house leaks.

⁴ <u>Gen. 2:23-24</u> And Adam said: "This is now bone of my bones and flesh of my flesh; she shall be called Woman, because she was taken out of Man." Therefore a man shall leave his father and mother and be joined to his wife, and they shall become one flesh. <u>Eph. 5:28-29</u> So husbands ought to love their own wives as their own bodies; he who loves his wife loves himself. For no one ever hated his own flesh, but nourishes and cherishes it, just as the Lord does the church.

- (B) Consistently failing to involve your wife in major family decisions involving the children's education and the accumulation of consumer debt; and
- (C) Failing to lead your wife with proper understanding, communication, cooperation, and transparency in your marriage and in the work of parenting.⁵

(4) Depriving your wife and children of adequate love, care, provision, integrity, and godly example, such that your flagrantly inconsistent lifestyle has placed a massive spiritual stumbling block before your entire family, tempting some of them to question the genuineness of your commitment to Christ, and still others to question the genuineness of the Christian faith itself.⁶

(5) Persistently maintaining these sinful patterns of behavior in recent years without substantial fruits of genuine repentance, despite

- (A) Ongoing marital counseling sessions and exhortations from your elders;
- (B) A formal private rebuke issued by the session on March 26, 2022; and
- (C) A suspension from the Lord's Table by your previous church in California just prior to your relocation to Michigan in 2017, the circumstances of which you failed to represent accurately to our session during the membership transfer process.⁷

In light of these charges, we exhort you in the name of Jesus Christ, Zion's only Head and King, to "bear fruits worthy of repentance" (Lk. 3:8).

In addition, we hereby grant you until November 10, 2022 between 6:30 and 7:30 p.m. (the scheduled time of our next marital counseling meeting at the church) to indicate whether or not you plan to contest these charges. If you choose to contest the charges, our session will be required to conduct a formal trial, which could result in your suspension from the privileges of communicant membership if you are found guilty. If you choose not to contest the charges, this is not an admission of guilt. However, it would allow us to issue the suspension without a formal trial.

Between now and our next meeting, we will pray for the Lord's gracious work in your heart and life.

With Sincere Love in our Lord Jesus Christ,

The SRPC Session Elder Jon Hughes (clerk) Elder John Kim Pastor Adam Kuehner (moderator)

⁷ <u>2 Chron. 24:19</u> Yet He sent prophets to them, to bring them back to the LORD; and they testified against them, but they would not listen. <u>Matt. 18:17b</u> But if he refuses even to hear the church, let him be to you like a heathen and a tax collector. <u>Jam. 1:22</u> But be doers of the word, and not hearers only, deceiving yourselves.

⁵ <u>1 Tim. 3:4</u> One who rules his own house well, having his children in submission with all reverence. <u>1 Pet. 3:7</u> Husbands, likewise, dwell with them with understanding, giving honor to the wife, as to the weaker vessel, and as being heirs together of the grace of life, that your prayers may not be hindered.

⁶ <u>2 Sam. 12:14</u> However, because by this deed you have given great occasion to the enemies of the LORD to blaspheme, the child also who is born to you shall surely die. <u>Matt. 18:6-7</u> Whoever causes one of these little ones who believe in Me to sin, it would be better for him if a millstone were hung around his neck, and he were drowned in the depth of the sea. Woe to the world because of offenses! For offenses must come, but woe to that man by whom the offense comes! <u>Rom.</u> <u>2:24</u> For "the name of God is blasphemed among the Gentiles because of you," as it is written. <u>Eph. 6:4</u> And you, fathers, do not provoke your children to wrath, but bring them up in the training and admonition of the Lord.

Southfield Reformed Presbyterian Church Minutes of the Session

December 8, 2022

The Session of the Southfield Reformed Presbyterian Church met on the Thursday, December 8, 2022 at the church.

- 1. Elders present were the Moderator Adam Kuehner, the Clerk Jon Hughes and John Kim.
- 2. The Moderator constituted the court in prayer at 6:45 p.m.
- 3. The matter of discipline for Gary Allison was taken up since he has failed to give true evidence of repentance for any of the sins he has previously been rebuked for. It was noted that a previous letter sent to him represented the charges pending against him and that he has contested those charges.
- 4. It was moved, seconded and passed to:
 - a. Appoint Adam Kuehner as Special Prosecutor.
 - b. Approve the charges and list of proposed witnesses as signed by Adam Kuehner as meeting all the criteria listed in BOD II.2.2 (E-10).
 - c. Approve a new letter to be given to Gary Allison restating the charges as signed by Adam Kuehner and outlining the list of proposed witnesses for the prosecution, etc. The letter is below.
 - d. Set a trial date for Saturday, January 21, 2023, at 9:00 a.m. EST at the church.
 - e. Require Gary Allison to refrain from the privileges of Communicant Membership until the matter has been concluded.
- 5. Gary and Edee Allison join the meeting.
- 6. Session then:
 - a. Presented the letter of charges to Gary Allison.
 - b. Sought to clarify exactly what Gary Allison was contesting in relation to each charge so that he would understand the limits of questioning by both the prosecution and defense that would be allowed during the trial. He did not provide further clarification regarding precisely what he was contesting.
 - c. He was reminded that he had not contested the previous rebuke and had indicated in subsequent counselling sessions his willingness to work through a plan of repentance. He still failed to elaborate.
 - d. Explained the rights that Gary Allison has as defined in the Book of Discipline as well as the structure of the trial.
 - e. Informed Gary Allison that he is to refrain from the privileges of Communicant Membership until the matter has been concluded.
 - f. Informed Gary Allison that he should notify the Session of anyone who is a member in good standing in the Reformed Presbyterian Church of North America that he desires to act as his counsel, preferably by December 31, 2022, so that there is sufficient time for preparation by the defense.

- 7. By common consent Jon Hughes was asked to serve as the Moderator during the trial.
- 8. John Kim led in prayer.
- 9. Gary and Edee Allison left the meeting.
- 10. It was moved, seconded and passed to adjourn. Jon Hughes adjourned the meeting in prayer at 8:31 p.m.



Where Christ is the center of it all

December 5, 2022

To our beloved brother in the Lord, Gary Allison:

In light of your decision to contest the charges against you, thereby requiring a formal trial, we are reissuing your accusation of sin along with a list of the witnesses whose testimony will constitute the prosecutorial evidence in your trial, which we do hereby schedule for **Saturday January 21, 2023 at 9:00 a.m. at the Southfield Reformed Presbyterian Church**. Pastor Kuehner will serve as special prosecutor in the case. In addition, per the provision in the RPCNA Book of Discipline 2.9 (E-12), we do hereby require you to refrain from the exercise of communicant privileges until final action in the case has been taken.

ACCUSATION OF SIN

I, Adam Kuehner, as special prosecutor appointed by the session, do hereby formally charge and accuse you, Mr. Gary V. Allison, of a grave and censurable offense against God's moral law; namely, <u>your long and</u> stubborn persistence in the harmful neglect of your wife and children, as manifested in the following ways.

(1) Neglecting for many years to provide for the spiritual wellbeing of your wife and children by leading regular daily family worship and carefully overseeing their discipleship, by way of teaching and example, in Christian faith and practice.¹

(2) Neglecting to provide for the temporal wellbeing of your family² by

- (A) Denying your wife full access to nearly all the family finances for many years, thereby forcing her to rely upon outside income and tempting her to abandon all trust and reliance upon you;
- (B) Failing to provide your son with a high school education this fall until late October, despite repeated requests from your wife and son, and without adequate explanation or subsequent repentance; and
- (C) Failing to provide a conducive living space for your family, as evidenced in the perpetually unfinished home remodeling projects which have, for many years, greatly inconvenienced and exasperated your children, during which time you have found ample opportunity for other projects and activities outside the home.³

¹ <u>Gen. 18:19</u> For I have known him, in order that he may command his children and his household after him, that they keep the way of the LORD, to do righteousness and justice, that the LORD may bring to Abraham what He has spoken to him <u>Deut. 6:7</u> You shall teach them diligently to your children, and shall talk of them when you sit in your house, when you walk by the way, when you lie down, and when you rise up. <u>Eph. 5:25-27</u> Husbands, love your wives, just as Christ also loved the church and gave Himself for her, that He might sanctify and cleanse her with the washing of water by the word, that He might present her to Himself a glorious church, not having spot or wrinkle or any such thing, but that she should be holy and without blemish. <u>Eph. 6:4</u> And you, fathers, do not provoke your children to wrath, but bring them up in the training and admonition of the Lord.

 $^{^2}$ <u>1 Tim. 5:8</u> But if anyone does not provide for his own, and especially for those of his household, he has denied the faith and is worse than an unbeliever. <u>Eph. 5:28-29</u> So husbands ought to love their own wives as their own bodies; he who loves his wife loves himself. For no one ever hated his own flesh, but nourishes and cherishes it, just as the Lord does the church.

³ Eccl. 10:18 Because of laziness the building decays, and through idleness of hands the house leaks.

(3) Neglecting to cultivate and maintain your "one flesh" marital unity⁴ by

- (A) Denying your wife full access to nearly all the family finances, as noted above;
- (B) Consistently failing to involve your wife in major family decisions involving the children's education and the accumulation of consumer debt; and
- (C) Failing to lead your wife with proper understanding, communication, cooperation, and transparency in your marriage and in the work of parenting.⁵

(4) Depriving your wife and children of adequate love, care, provision, integrity, and godly example, such that your flagrantly inconsistent lifestyle has placed a massive spiritual stumbling block before your entire family, tempting some of them to question the genuineness of your commitment to Christ, and still others to question the genuineness of the Christian faith itself.⁶

(5) Persistently maintaining these sinful patterns of behavior in recent years without substantial fruits of genuine repentance, despite

- (A) Ongoing marital counseling sessions and exhortations from your elders;
- (B) A formal private rebuke issued by the session on March 26, 2022; and
- (C) A suspension from the Lord's Table by your previous church in California just prior to your relocation to Michigan in 2017, the circumstances of which you failed to represent accurately to our session during the membership transfer process.⁷

List of Witnesses (*Required* to Testify): Cameron Adams, Taralah Adams, Charlotte Allison, Kaelyn Allison, Kathryn Allison, Stephen Allison, Jonathon D'Amato, Shayna D'Amato, Jon Hughes, John Kim, Adam Kuehner.

List of Witnesses (Requested to Testify): Brendan Allison, Edee Allison.

With Sincere Love in our Lord Jesus Christ,

The SRPC Session Elder Jon Hughes (clerk) Elder John Kim Pastor Adam Kuehner (moderator)

⁷ <u>2 Chron. 24:19</u> Yet He sent prophets to them, to bring them back to the LORD; and they testified against them, but they would not listen. <u>Matt. 18:17b</u> But if he refuses even to hear the church, let him be to you like a heathen and a tax collector. <u>Jam. 1:22</u> But be doers of the word, and not hearers only, deceiving yourselves.

⁴ <u>Gen. 2:23-24</u> And Adam said: "This is now bone of my bones and flesh of my flesh; she shall be called Woman, because she was taken out of Man." Therefore a man shall leave his father and mother and be joined to his wife, and they shall become one flesh. <u>Eph. 5:28-29</u> So husbands ought to love their own wives as their own bodies; he who loves his wife loves himself. For no one ever hated his own flesh, but nourishes and cherishes it, just as the Lord does the church.

⁵ <u>1 Tim. 3:4</u> One who rules his own house well, having his children in submission with all reverence. <u>1 Pet. 3:7</u> Husbands, likewise, dwell with them with understanding, giving honor to the wife, as to the weaker vessel, and as being heirs together of the grace of life, that your prayers may not be hindered.

⁶ <u>2 Sam. 12:14</u> However, because by this deed you have given great occasion to the enemies of the LORD to blaspheme, the child also who is born to you shall surely die. <u>Matt. 18:6-7</u> Whoever causes one of these little ones who believe in Me to sin, it would be better for him if a millstone were hung around his neck, and he were drowned in the depth of the sea. Woe to the world because of offenses! For offenses must come, but woe to that man by whom the offense comes! <u>Rom.</u> <u>2:24</u> For "the name of God is blasphemed among the Gentiles because of you," as it is written. <u>Eph. 6:4</u> And you, fathers, do not provoke your children to wrath, but bring them up in the training and admonition of the Lord.

GLG 23-5: Complaint v. Southfield RPC session from Gary Allison regarding the session's decision to schedule a trial.

Mr. Allison's complaint alleges reasons why the Southfield RPC session erred in issuing an accusation of sin (dated Oct 27, 2022, sent registered mail). Mr. Allison contested these charges. Mr. Allison further complained about the action of the session on Dec 8, 2022, in scheduling a trial for Jan 21, 2023.

"I humbly ask the Presbytery to annul or reverse the action of the Session of Southfield Reformed Presbyterian Church on Dec 8, 2022, to issue an accusation of sin and schedule a trial without following the requirements of the Bible, our confessional standards, and The Book of Discipline."

Fathers and brothers,

We examined the complaint with pertinent records. We believe the Southfield RPC session has correctly followed the requirements of the Bible and our confessional standards, including the Book of Discipline, in charging Mr. Allison with alleged sin. Further, when Mr. Allison contested the charge, which is his constitutional right, the session correctly followed the same Biblical and constitutional requirements to schedule a trial.

Rationale

The BoD Sect. I, Ch. 3, lays out the steps of Matthew 18 when a court deals with sin in the church. We believe that the Southfield session followed these steps. (BoD I.3.1-5, E-4).

- 1. The elders directly addressed the alleged sin with Mr. Allison.¹
- 2. According to the record, Mr. and Mrs. Allison were shepherded with love and care. The record notes that from July 2021 to December 2022, all three elders met with Mr. and Mrs. Allison on ten occasions (*dates can be provided*) to investigate and discuss these matters. ²

¹ BoD I.3.1. If session or a higher court learns of a sinning member, it must not ignore the situation. The court may deal with the situation directly or by a judicial commission. (See section II, chap. 4, par. 1, as well as the Directory for Church Government, chap. 6, par. 16 on page D-35.)

² Bod I.3.2 If there is reasonable evidence that a member is teaching heresy, disregarding or violating the moral law, or showing contempt for the courts of the church, the court shall contact that member in love and with care, and shall investigate the allegations.

- 3. The Minutes record that Mr. Allison was rebuked (Feb 6, 2022) for six incidents of patterned sin, also cited in the later Accusation of Sin (Oct 27, 2022). According to the record, Mr. Allison did not contest the rebuke but sought forgiveness.³
- 4. The session alleges that Mr. Allison continued these sins after the rebuke.
- 5. On Oct 27, 2022, the session approved a letter of Accusation of Sin. On Nov 10, 2022, Mr. Allison contested the charge. Therefore, the Southfield session scheduled a trial according to the steps in the Book of Discipline.⁴

Further Observations

Interacting with Mr. Allison's ways in which the session has erred:

- 1. Matthew 18 is being carried out not by the witnesses, as offended parties, but by the session itself. Therefore, the accusations or statements of Mrs. Allison or any other witness are not a necessary basis for the session's charge of sin.
- 2. The record indicates that the session does have sufficient evidence to warrant a trial.
- 3. The record shows that the session has taken appropriate shepherding measures to love, care for, and strengthen the whole family, including this action.

Recommendations:

- 1. The GLG Presbytery permits Mr. Allison to address the court for up to 10 minutes concerning this complaint.
- 2. That the GLG Presbytery not sustain this complaint.

Shawn Anderson, Jerry Foltz, James Odom

<u>3 BoD I.3.3 If the sinner confesses and repents, there must be forgiveness and reconciliation, and the matter shall be closed. You have won your brother. Such closure may include counsel or censure appropriate to the circumstances.</u> Bod I.3.4. If the accused does not contest the charges, regardless of whether or not he acknowledges the truthfulness of the accusation, and does not give evidence of repentance from the alleged sin, the court may proceed, without formal trial, to the imposition of any formal censure in hope of repentance. (See chap. 4 for appropriate censures.))

⁴ BoD I.3.5. However, if the accused takes steps to contest the charges, the court may not proceed to issue a censure beyond admonition or rebuke without conducting a formal trial. (See section II for the formal trial process.)

Where Christ is the center of it all

February 23, 2022

Dear Fathers and Brethren,

In order to assist the court in addressing GLG 23-5, we would like to offer the following summary of the narrative surrounding Mr. Gary Allison which has led us to this point. In order to protect the complainant's public reputation, we plan to give this letter to whatever committee is assigned to review GLG 23-5. If necessary, we are willing to read this letter on the floor of presbytery, preferably in executive session.

- 1. The Allison family moved to Oakland County, Michigan from Southern California in August of 2017 and immediately began worshiping with us. Upon their arrival, they held their membership at Hope Protestant Reformed Church in Redlands, California. The family included Gary Allison and his wife Edee, along with their four communicant children and two baptized non-communicant children.
- 2. Before relocating to Michigan, Gary had been under suspension by Hope PRC for (a) verbal and physical abuse of his wife and family, (b) failing to develop a plan to pay off his debts, and (c) failing to regularly attend and heed instruction in marital counseling with his elders. Prior to this discipline, Gary had been arrested for causing physical harm to Edee. Upon his release, he took the entire family to live with his brother in Texas, while Edee told a judge that it was just a misunderstanding. (In substance, none of these facts are disputed by the family, including Gary.)
- 3. Unfortunately, most of these facts were unavailable to our session when the Allisons requested the transfer of their membership to SRPC in 2018. All we knew was that (a) Gary had been under suspension for the physical abuse of his wife some years back; (b) Gary confessed this sin openly and repeatedly to us in tears, with Edee confirming that he was fully repentant; (c) The entire family confirmed that no physical abuse had occurred for at least a couple of years; (d) Hope PRC sent us paperwork that included virtually no details regarding the discipline, left a further inquiry unanswered, and characterized the Allisons' decision to join the RPCNA as inherently sinful due to our belief in the free offer of the gospel.
- 4. After meeting with Gary and Edee several times to discuss their marriage and evaluate Gary's repentance, we eventually approved the family's membership transfer and removed Gary's censure (4/1/18).
- 5. Over the next several years (2019-2021), it became increasingly clear during various shepherding visits conducted by Elder Kim and Pastor Kuehner that Gary and Edee had not been totally forthright about their situation. Edee eventually admitted that the prior physical abuse had been more widespread and severe, involving both her and the children. When confronted with this, Gary confessed his *utter depravity of nature* with deep sighs and elaborate theological vocabulary. Yet, regarding specific sins, he was ambiguous and defensive, giving the impression that his confession of sin to the elders had been restricted to a small fraction of the abuse alleged against him. According to Edee, this is why their previous elders had refused to lift his censure. She also admitted that she had misled the session during the transfer process. Since things had improved temporarily, she had wanted to put the past behind her.
- 6. As the session gradually gained further clarity regarding Gary's past, things began to deteriorate rapidly within Gary and Edee's marriage, especially with regard to finances and decision making. Elder Kim and Pastor Kuehner met with Gary and Edee on 6/8/21 to discuss these matters and concluded that regular counseling with the entire session (Kim, Kuehner, Hughes) was needed. Over the next 17 months *July 2021 to December 2022* all three elders met with Gary and Edee on ten occasions (7/17/21, 9/18/21, 11/13/21, 1/15/22, 4/30/22, 6/25/22, 7/14/22, 10/11/22, 11/10/22, 12/8/22) for roughly two hours per session. One of these sessions (11/18/21) involved a 'family reconciliation' meeting in which three of Gary and Edee's daughters and two of their sons-in-law (all SRPC communicants) spoke openly and respectfully to Gary about their concerns regarding his behavior in the home toward his wife and

children. Based on the facts and feedback revealed in the meeting, the session warned Gary that if he did not begin to demonstrate love for his family in keeping with his practical biblical duties (e.g. family worship, maintaining the house, open communication/cooperation with his wife in family finances and decision making, etc.) he would be subject to discipline.

- 7. Within a few months of the family meeting, Gary still showed no clear signs of repentance. Regular family worship was not happening. Communication and cooperation with Edee were not happening. Moreover, without his wife's consent, Gary had pulled his teenage son out of private school during the winter break (without giving his son advance notice) and told Edee to homeschool him. Meanwhile, Edee was busy working as a house cleaner to provide for herself, since she had little to no access to the family finances.
- 8. On 2/6/22, the session approved a private rebuke of Gary, which it shared with him during a subsequent counseling meeting. The session also noted Edee's sinful pattern of speech and behavior toward her husband and issued her a letter of counsel, requiring her to meet regularly with Laura Kim for biblical counseling in order to improve in this area, and as a means of avoiding discipline.
- 9. Following the rebuke and letter of counsel, the session met with Gary and Edee several more times to help them follow through with the fruits of repentance. For Gary, this meant asking the forgiveness of family members for the sins listed in the rebuke, and then taking practical steps to improve in these areas. For Edee, that meant regularly meeting with Laura and following her counsel, which included praying regularly for Gary and seeking to honor him in obedience to God. Both indicated their willingness to follow the plan of repentance outlined by the session. Gary began asking forgiveness of family members and claimed he would make practical changes. Edee was very teachable and humble, desiring to improve.
- 10. By October of 2022, it became evident that Gary was not following through with the fruits of repentance. Little, if any, progress had been made in the areas listed in the rebuke. Moreover, due to his own failure to properly register his son for private school in the fall (for which he blamed his wife), he had responded by refusing to enroll his son in online school (as researched and requested by Edee), thus leaving his son at home in academic limbo for 6-8 weeks. Not until the *night before* our counseling session (10/11/22) did Gary finally approve the funds for enrollment in the online school, meaning that classes would not begin for another couple of weeks, leaving his son more than two months behind schedule. When confronted with the situation, Gary confirmed the relevant facts, yet defended his actions and blamed his wife.
- 11. On 11/10/22, the session approved a letter of accusation, pursuant to suspension, which afforded Gary the opportunity to contest the charges in order to secure a formal trial. Gary later opted to contest the charges, thereby requiring a trial. On 12/8/22, the session scheduled the trial for 1/21/23. Gary subsequently filed a complaint to presbytery against the session for its decision to schedule the trial. Due to the complaint, the session postponed the trial until after the spring meeting of presbytery.

Respectfully Submitted,

The SRPC Session Elder Jon Hughes (clerk) Elder John Kim Pastor Adam Kuehner (moderator)