## JUDICIAL COUNCIL OF THE UNITED METHODIST CHURCH

### **DECISION 1472**

[Docket 1022-26]

IN RE: Petition for Clarification of Judicial Council Decision 1451 from the Council of Bishops.

#### **DIGEST**

Annual conferences are permitted to hold elections to fill vacancies in the General Conference delegation due to death, resignations, or otherwise, up to the maximum number of allocated delegates, provided vacancies cannot be filled with reserve delegates.

If a delegate's status as clergy or lay has changed since the election, the person is disqualified from serving as delegate and must be declared ineligible, and the vacancy in the General Conference delegation may be filled by electing a new delegate if the vacancy cannot be filled with reserve delegates.

When two or more annual conferences unite to become a merged conference, the duly elected delegates of each original annual conference are eligible to serve; the delegate number continues unchanged for the postponed 2020 General Conference until it is adjusted for the next General Conference; and vacancies may be filled with new elections up to the maximum number of originally allocated delegates if they cannot be filled with reserve delegates.

The Commission on the General Conference is required to schedule and plan for a regular session of General Conference to be convened after the adjournment of the postponed 2020 General Conference, between January 1, 2025 and December 31, 2027.

#### STATEMENT OF FACTS

On January 6, 2023, during their virtual meeting, the Council of Bishops [hereinafter Petitioner] voted to submit a request for clarification of JCD 1451 issued on December 12, 2022. The Petition presents four specific questions:

### **Question 1:**

If an annual conference has vacancies in its General Conference delegation due to death, resignation, or otherwise, does JCD 1451 allow an annual conference to

hold elections to fill the vacancies that have not already been filled by its reserve delegates?

## **Question 2:**

If a person was elected as a lay or clergy delegate for the postponed 2020 General Conference and that person's status as a lay or clergy person has changed since election by the annual conference, do ¶¶ 34-36 of the 2016 Book of Discipline require that the delegate be declared ineligible to serve as a delegate in the status as elected and thereby creating a vacancy to be filled by the election of a new lay delegate if there is no reserve delegate to fill the vacancy?

### **Question 3:**

In regard to delegates who were elected from two previous annual conferences for the postponed 2020 General Conference that have since merged, (a) which delegates previously elected are eligible to serve at the postponed 2020 General Conference; and (b) if the merged annual conference is entitled to fewer delegates, what is the process under the Discipline for determining who among those previously elected is eligible to serve, including the date for determination of the delegates?

## **Question 4:**

Based on the holding in JCD 1451, is the Commission on the General Conference required to schedule and make arrangements pursuant to ¶ 511.4 for a session of the General Conference to occur in the quadrennium after the adjournment of the postponed 2020 General Conference in 2024 and before December 31, 2027?

Petitioner and five *amici curiae* filed separate and joint briefs in this case.

### **Jurisdiction**

The Judicial Council has jurisdiction pursuant to ¶ 2610.1 of *The Book of Discipline of The United Methodist Church*—2016 [hereinafter the *Discipline*].

### **Analysis And Rationale**

**QUESTION 1:** Under the holding of JCD 1451, annual conferences "that conducted elections in 2019 have met the requirements of ¶ 502.3 and, therefore, are <u>not required</u> to hold new elections." [emphasis added] The plain meaning of this language is unmistakable: "not required" does *not* mean "not permitted." Therefore, annual conferences *are* permitted to hold elections to fill vacancies under the following conditions:

The Constitution instructs annual conferences to "elect clergy and lay delegates to the General Conference and to its jurisdictional or central conference in the manner provided in [¶¶]

34-36]." Const. ¶ 34. Paragraph 34 specifies that annual conferences may elect delegates "up to the number determined by the ratio for representation in the General Conference," that is up to the maximum number of allocated delegates, and further establishes an order of succession to fill vacancies in the General Conference delegation due to death, resignations, or otherwise. This succession process requires that vacancies be filled *first* with delegates to jurisdictional or central conference "in the order of their election" and *second* with reserve delegates to jurisdictional or central conference "when it is evident that not enough reserve delegates are in attendance at the General Conference." Const. ¶ 34. Put differently, vacancies shall be filled by advancing reserve delegates in the prescribed sequence until the pool of reserve delegates is completely emptied. The pre-condition for new elections is depletion of the reserve delegate pool. When that point is reached, and *only* then, ¶ 33 grants annual conferences "the right to vote...on the election of clergy and lay delegates to the General and the jurisdictional or central conferences" and to elect new delegates up to the maximum number of allocated delegates.

We cannot find in the Constitution or *The Discipline* any support for the position taken by *amici curiae* that "this process has always been considered to be one election process in The United Methodist Church" and that "[t]here is no current provision for 'filling in the blanks' after reserve delegates are advanced due to death, resignation, change of status, etc. of members of the delegation." Opening Brief of Marshall, Reist, and Graves, at 3. Contrary to their assertions, Church law does not prohibit annual conferences from holding elections to fill vacancies after all reserve delegates have been advanced. To conclude otherwise would negate the reserved right of annual conferences and the electoral process enshrined in our founding document.

Under a harmonizing interpretation of ¶¶ 33 and 34, annual conferences are permitted to hold elections to fill vacancies in the General Conference delegation up to the maximum number of allocated delegates, provided the vacancies cannot be filled with reserve delegates.

## **Answer to Question 1: YES**

**QUESTION 2:** Eligibility to be elected and serve as a delegate to General Conference, jurisdictional, or central conference is based on: (a) annual conference membership for clergy and (b) local church membership and participation for laity. The Constitution, in ¶ 35, states that clergy delegates "shall be elected from the clergy members in full connection and shall be elected by the clergy members of the annual conference or provisional annual conference." [emphases added] *See also* ¶ 602.1. Further, ¶ 36 declares that lay delegates "shall have been professing members of The United Methodist Church for at least two years next preceding their election, and shall have been active participants in The United Methodist Church for at least four years next preceding their election." [footnotes omitted] Construing this provision, the Judicial

Council held that "[t]he membership requirement of laity is that of <u>one's local church</u> within the annual conference." JCD 1405 [emphasis added].

Lay delegates, to be eligible to serve, must be in the status in which they were elected "at the time of holding the General and jurisdictional or central conferences." Const. ¶ 36. Likewise, to be qualified for service, clergy delegates must stay in the same category to meet the requirement of being "elected from the <u>clergy members in full connection</u>" under ¶ 35 [emphasis added]. If a status change has occurred since the election, the legal basis of eligibility ceases to exist and, therefore, such persons are not qualified to serve as delegates. The same rule applies to delegates who switch from clergy to lay or lay to clergy but then revert to their original status; they too are deemed ineligible because they cannot be reinstated without re-election.

If a delegate becomes ineligible due to status change, the person must be declared ineligible, and the vacancy in the General Conference delegation may be filled in the manner provided in ¶¶ 33-36 and discussed above in Question 1.

## **Answer to Question 2**: YES

QUESTION 3: When two or more annual conferences unite to become a merged annual conference, the delegates duly elected by each original annual conference stand as submitted and certified by the annual conference secretaries for the purpose of being seated in the postponed 2020 General Conference as well as jurisdictional and central conferences. The delegate number continues unchanged for the postponed 2020 General Conference until it is adjusted for the next General Conference. Vacancies may be filled with new elections up to the maximum number of originally allocated delegates if they cannot be filled with reserve delegates.

The authority for this solution is the clear and unequivocal constitutional imperative that "the reserved right of an annual conference to vote on the election of clergy and lay delegates to General Conference, jurisdictional, and central conferences...cannot be abrogated." JCD 1451. Requiring the delegate number to be reduced, as suggested by Petitioner, or new elections to be held for all annual conferences (including mergers), as advocated by one *amicus*, would amount to overturning the results of the 2019 elections and disenfranchising the clergy and lay members of the original annual conferences who voted in good faith. It would also deprive delegates of each original annual conference of their right to be seated and serve at the General Conference session for which they were duly elected. There is no basis in Church law for such course of action.

**Answer to Question 3:** In the case of a merger of two or more annual conferences, the duly elected delegates of each original annual conference are eligible to serve at the postponed 2020

General Conference as well as jurisdictional and central conferences under the same delegate number until it is adjusted for the next General Conference.

QUESTION 4: The Constitution "establishes the minimum frequency at which the General Conference must convene, not the actual year when this occurs," by setting the number at once every four years in ¶ 14. JCD 1451. Since ¶ 14 stipulates one session per every four years, another regular session of General Conference is therefore required. Under this provision, a regular session of General Conference must be convened after the adjournment of the postponed 2020 General Conference, between January 1, 2025 and December 31, 2027. The Commission on the General Conference is the duly authorized body under *The Discipline* to schedule and plan for this event.

**Answer to Question 4**: YES

#### Decision

Annual conferences are permitted to hold elections to fill vacancies in the General Conference delegation due to death, resignations, or otherwise, up to the maximum number of allocated delegates, provided vacancies cannot be filled with reserve delegates.

If a delegate's status as clergy or lay has changed since the election, the person is disqualified from serving as delegate and must be declared ineligible, and the vacancy in the General Conference delegation may be filled by electing a new delegate if the vacancy cannot be filled with reserve delegates.

When two or more annual conferences unite to become a merged conference, the duly elected delegates of each original annual conference are eligible to serve; the delegate number continues unchanged for the postponed 2020 General Conference until it is adjusted for the next General Conference; and vacancies may be filled with new elections up to the maximum number of originally allocated delegates if they cannot be filled with reserve delegates.

The Commission on the General Conference is required to schedule and plan for a regular session of General Conference to be convened after the adjournment of the postponed 2020 General Conference, between January 1, 2025 and December 31, 2027.

March 20, 2023

## **Dissenting Opinion**

I dissent from this decision. There is no point in using a language other than what is already in  $\P$  14. This puts Judicial Council in danger of legislating rather than upholding the *Book of Discipline*.

Kabamba Kiboko Dennis Blackwell Lidia Gulele

March 20, 2023

# **Separate Opinion**

Paragraph 13 Article I contains the provisions that govern the composition of the General Conference and ¶ 14 Article II specifies the frequency of the **regular sessions** of General Conference, followed by the provisions governing special sessions of General Conference. In this Decision, we need to revisit certain portions of Decision 1451 and modify the same so that 1451 is not at risk of causing the denomination to have the impression that the Judicial Council has undermined and usurped the authority of the General Conference by creating new legislative polity. Equally important is the need to clarify and amend other portions of Decision 1451 so as to ensure that the Judicial Council is not advocating the misinterpretation, misconstruction, and misapplication of the United Methodist Constitution and *Book of Discipline*.

The United Methodist Church is a connectional system that has a quadrennial structure. The language in ¶ 14 speaks volumes in its simplicity. "The General Conference shall meet once in four years..." There are no other qualifiers or conditions. It is unequivocal. The meaning is simple: once in four years. Not "at least once in four years" nor "at most once in four years." The Constitution is clear and concise: once in four years. Given that the following section deals with Special Sessions of General Conference, we thus know that the provision "once in four years" applies to the Regular Sessions of General Conference.

Now, if ¶ 14 was the only place in the Discipline which contained a resolute four-year provision, then one might have the impression that the four-year rule can be interpreted to mean that extraordinary circumstances — such as a global pandemic — might demand an increase in frequency so that the denomination "makes up" for a missed, delayed, or rescheduled General Conference. But such is not the case. Our very **structure** is quadrennial and any attempt to hold a Regular Session of General Conference in less than four years will have a chaotic structural effect and the consequences will likely be far more egregious than the difficulty that has been experienced by the denomination's need to continue to exist within the confines of rules and legislation that were subject to amendment in 2020.

First, as to  $\P$  14 itself, it is worthy of note that the language remained wholly unchanged from the inception of the denomination in 1968 until the adjournment of the 2016 General Conference

when the phrase "in *the month of April or May*" was removed, thereby removing the restriction that Regular Sessions of General Conference could only convene during that sixty-day window:

## 1968 Discipline:

¶ 13. Article II. — The General Conference shall meet *in the month of April or May* once in four years at such time and in such place as shall be determined by the General Conference or by its duly authorized committees.

## 1972, 1976, 1980, 1984, 1988, 1992, 1996, 2000, 2004, and 2008 Disciplines:

¶ 13. Article II. — The General Conference shall meet *in the month of April or May* once in four years at such time and in such place as shall be determined by the General Conference or by its duly authorized committees.

## **2012** *Discipline* [paragraph number changed from 13 to 14]:

¶ 14. Article II. — The General Conference shall meet *in the month of April or May* once in four years at such time and in such place as shall be determined by the General Conference or by its duly authorized committees.

# The current **2016 Discipline**:

¶ 14. Article II. — The General Conference shall meet *in the month of April or May* once in four years at such time and in such place as shall be determined by the General Conference or by its duly authorized committees. *The change in the preceding sentence shall become effective at the close of General Conference in 2016*.

A thorough search of the Judicial Council decisions prior to 2016 [the year that the current Judicial Council was constituted] will show that there has never been a suggestion that this provision of the constitution is a "minimum" requirement concerning the frequency of the Regular Sessions of General Conference. Nor can such a provision be found in former Disciplines. One reason that no such interpretation has been suggested concerning the frequency of the Regular Sessions is presumably because the Constitution already provides the means to handle an extraordinary circumstance necessitating an additional session of General Conference: the Special Session.

However, I believe that it is the very structure of this connectional system that precludes one from giving serious consideration to an interpretation of ¶ 14 as representing the concept that General Conference shall meet in Regular Session "at least once every four years". A **cursory** look at the Discipline shows numerous examples of the quadrennial nature of our structure. These are merely some of the quadrennial references in the current *Discipline* [2016]

page 15: The structure of Methodist, United Brethren, and Evangelical Association churches allowed them to function in ways to support, consolidate, and expand their ministries. ... **General Conferences, meeting quadrennially,** proved sufficient to set the

main course for the church, including the creation of the Discipline by which it was governed.

¶ 13.3 In the case of The Methodist Church in Great Britain, mother church of Methodism, provision shall be made for The United Methodist Church to send two delegates annually to the British Methodist Conference, and The Methodist Church in Great Britain to send four delegates quadrennially to The United Methodist General Conference, the delegates of both conferences having vote and being evenly divided between clergy and laity.

### Local Church

¶ 251.2 The lay member(s) of the annual conference and alternates shall be elected annually **or quadrennially** as the annual conference directs. ...

### Ministry of the Ordained

- ¶ 308. ... The board shall nominate from within the order's membership and the order shall elect quadrennially a chairperson of the order ....
- ¶ 323. Fellowship of Local Pastors and Associate Members—
  - 2. ... The board shall nominate from within the Fellowship membership and the Fellowship shall elect quadrennially a chairperson of the Fellowship....
- ¶ 511. Commission on the General Conference—There shall be a Commission on the General Conference, hereinafter called the commission.
- 1. Membership—a) The voting members of the commission shall be elected quadrennially by the General Conference
- 2. Officers—The officers of the commission shall be a chairperson, a vice-chairperson, and a secretary, all of whom shall be elected by the commission at the **quadrennial organizational meeting**. They shall serve until the adjournment of the next succeeding **quadrennial session of the General Conference** after their election and until their successors are duly elected and qualified.
- $\P$  603.8 ... The chancellor and any associate chancellors shall be nominated by the bishop and elected quadrennially by the annual conference ...
- ¶ 619. Conference Treasurer/Director of Administrative Services—Each annual conference, on nomination of its council on finance and administration, shall at the first session of the conference after the **quadrennial session of the General Conference** or jurisdictional conference, or at such other times as a vacancy exists, elect a conference treasurer or conference treasurer/director of administrative services.<sup>70</sup> [185] The treasurer or treasurer/director shall serve for the quadrennium or until a successor shall be elected and qualify. If a vacancy should occur during the quadrennium, the council shall fill the vacancy until the next session of the annual conference. ...

- ¶ 636. Conference Administrative Review Committee—There will be an administrative review committee composed of three clergy in full connection and two alternates who are not members of the cabinet, the Board of Ordained Ministry, or immediate family members of the above. The committee shall be nominated by the bishop and elected quadrennially by the clergy session of members in full connection with the annual conference. ...
- ¶ 637. Conference Committee on Episcopacy—1. There shall be a conference committee on episcopacy elected quadrennially by the annual conference at the session following the General Conference. ...
- ¶ 701. Agencies and General Agencies—
  - 2. ... or committees related to the quadrennial sessions of the General Conference. [Decision 139] ...
- ¶ 703. Definitions, Structures, and Titles—
  - 10. Special Program A special program is a **quadrennial emphasis** initiated by a general program-related agency in accordance with ¶ 905, **approved by General Conference**, **and assigned** to a general program-related agency. The program shall be designed in response to a distinct opportunity or need in God's world that is evidenced by research or other supporting data and shall propose achievable goals **within the quadrennium**.
- ¶ 704. Financial Accountability of General Agencies ... A quadrennial report of such accounting shall be included in the report of the General Council on Finance and Administration to the General Conference. ...
- ¶ 713. Election of General Secretaries of Program Agencies and Termination of General Agency Staff The **general secretary of each general program agency** that is accountable to the Connectional Table **shall be elected quadrennially** by ballot of the board of the agency involved.
- ¶ 715. Provisions Pertaining to Staff— ...
  - 4. Provisions of the Retirement Plan for General Agencies, ....
    - d) ... In addition, the General Board of Pension and Health Benefits shall include general agency benefits and benefits for bishops in its **quadrennial report to General Conference** concerning the long-term benefit liabilities of the denomination.

#### Section II. General Council on Finance and Administration

- ¶ 805. Organization—
  - 1. *Membership*—The twenty-one voting members of the council **shall be elected** quadrennially.
  - 2. *Meetings*—The council shall <u>meet at least annually</u> and at such other times as are necessary on call of the president or on written request of one-fifth of the members. Eleven voting members shall constitute a quorum.
  - 3. *Officers* ...
    - b) The council shall **elect quadrennially**, in such manner as it shall provide in its bylaws, a **general secretary**, who shall also be the treasurer and chief executive officer of the council. ...
  - 6. Financial Support— ...
    - b) The council shall submit to each quadrennial session of the General Conference budgets of estimated income and expense for the four years of the ensuing quadrennium. ...
    - c) The council shall report to each **quadrennial session of the General Conference** the amounts of its actual income and expenditures for the four preceding years.
- ¶ 806. Fiscal Responsibilities— ...
  - 1. It shall submit to each **quadrennial session of the General Conference**, for its action and determination, ...
    - e) The Connectional Table shall receive from the General Council on Finance and Administration copies of the proposed annual budgets of the general program agencies, in order that it may review such budgets in relation to the program proposals made by those agencies in their **quadrennial budget** requests.....
  - 3. Accounting and Reporting—It shall require all agencies receiving general Church funds (see ¶ 810.2) to follow uniform accounting classifications and procedures for reporting. It shall include in its **quadrennial report to the General Conference** a fiscal report for each such agency receiving general Church funds. ...
- ¶ 807. Other Fiscal Responsibilities—
  - 7. To establish a **procedure for making a quadrennial review**, initiating proposals and/or responding to proposals by the general agencies regarding the location of headquarters and staff and reporting the same to the General Conference.

- ¶ 851 ... They shall serve until the adjournment. of the next succeeding **quadrennial** session of the General Conference after their election and until their successors are duly elected and qualified. ...
- ¶ 856. ... The <u>General Conference at each quadrennial session</u> shall elect a Council on World Service and Finance which shall...
- ¶ 858.1 It shall submit to each quadrennial session of the General Conference ...
- ¶ 862. 1. Prior to each **quadrennial session of the General Conference** the council shall make

The Judicial Council itself operates within a quadrennial structure:

- ¶ 2602.1 ... Elections shall be held at each session of the General Conference for only the number of members whose terms expire at such session ...
- 2. Nominations and Election—Members of the council shall be nominated and elected in the manner following: At each quadrennial session of the General Conference, the Council of Bishops shall nominate by majority vote three times the number of ordained ministers and laypersons to be elected at such session of the General Conference. The number to be elected shall correspond to the number of members whose terms expire at the conclusion of such session. ...
- ¶ 2605. Expiration of Term—The term of office of the members of the council and of the alternates shall expire upon the adjournment of the General Conference at which their successors are elected.

Thus, just as an example, in 2024 the Regular Session of General Conference will elect my successor and three others. The five persons who were elected in the 2016 General Conference would normally continue on to 2028. However, if a Regular Session of General Conference were to convene in 2026, then **that** would require the election of new Judicial Council members *because* the election of Judicial Council members occurs at each Regular Session of General Conference, and thus trigger the expiration of the term for my colleagues in 2026 rather than 2028 [given that they were elected in 2016, they have already served their eight-year term].

However, what are the implications for those elected at a 2026 "Regular Session"? At the 2028 General Conference, they will have served two years. At a 2032 Regular Session, they will have served only six years, but the Discipline presumes the election of Judicial Council members at each Regular Session so that would presumably cut their term from eight years to six years. My sense is that the quandary as to this example of the Judicial Council is relatively minor compared to all of the executive staff that we elect and employ in the General Church who are likewise subject to operating within a quadrennial framework financially and programmatically.

Although this is a very long means of making a point, it appears to be necessary to be as concrete as possible in providing an indication of the scope of the ramifications that a poorly deliberated decision can have on the denomination.

Thus, I would certainly deem any language in 1451 that purports an interpretation of ¶ 14 as being a "minimum requirement" to be in error and advise that it be struck and of no effect.

This brings me to the next point. All of these decisions ought to explicitly set forth that any purported remedy is **only** for this particular circumstance that was brought about by the global pandemic. We should caution that the set of decisions dealing with issues resulting from the canceled, postponed, or rescheduled Regular Session of our various conferences, are in specific and direct response to these circumstances **only** and should not be relied upon or considered to be precedent for any other future catastrophe.

As to the issue of those who are to attend General Conference as delegates, there are actually a number of cases that address various aspects of the questions that have been posed on these matters, but when taken as a whole, the rationale and analysis offered by them is consistent with our general polity.

Decision 5 is quite helpful in understanding the context and meaning of the language and provisions in ¶ 33 [2016 *Discipline*] and can lead one to a more accurate interpretation.

Paragraph 33 provides in part:

¶ 33. Article II. — The annual conference is the basic body in the Church and as such shall have reserved to it the right to vote on all constitutional amendments, on the election of clergy and lay delegates to the General and the jurisdictional or central conferences, on all matters relating to the character and conference relations of its clergy members, and on the ordination of clergy and such other rights as have not been delegated to the General Conference under the Constitution, with the exception that the lay members may not vote on matters of ordination, character....

I observed that recently this paragraph has been paraphrased in such a way that it seems to have changed the focus and meaning of those words in the first clause or the first part of the sentence. The paragraph is delineating those functions that are within the authority of the annual conference solely. Those functions or tasks are the responsibility of the annual conference alone, no other body. Thus, voting for General Conference delegates and voting on matters related to character and conference relations of its clergy, are tasks that are reserved for action by the annual conference alone; not General Conference nor, as in Decision 5, a Missional Conference on this issue of electing delegates to General and Jurisdictional Conference.

The 1939 *Discipline* sets forth the following constitutional provision:

¶ 22. Article II. — The Annual Conference is the basic body in the Church, <u>and as such shall have reserved to it the right to vote on</u> all constitutional amendments, on the election of Ministerial and Lay delegates to the General and the Jurisdictional or Central

Conferences, ·on all matters relating to the character and conference relations of its Ministerial members, and on the ordination of Ministers, ..and such other rights as have not been delegated to the General ·Conference under the Constitution, with the exception that the Lay members may not vote on matters of ordination, character, and Conference relations of Ministers. It shall discharge such duties and exercise such powers as the General Conference under the Constitution may determine.

In response to a request from the 1940 General Conference as to whether Missional Conferences had the right to elect delegates to the General and Jurisdictional Conferences, the Judicial Council held:

It is the fundamental law that the Annual Conference is the basic body of the Church, and as such shall have reserved to it, inter alia, the right to vote on the election of Ministerial and Lay delegates to the General and the Jurisdictional or Central Conferences. (See Paragraph 22, Discipline 1939.)

Reference to other paragraphs of the Constitution confirms the conclusion that **the Annual Conference only** is the body to which is granted the right to elect delegates to General and Jurisdictional Conferences.

Decision 221 is also helpful on some of the issues presented herein. It is one among a handful of Decisions that provides a historic precedent upon which we can rely. As to the matter at hand, Decision 221 provides a basis for subsequently merged annual conferences to have their respective delegates, that had been duly elected to General Conference prior to their annual conference's merger, seated at the 1966 Special Session of General Conference, noting:

... We interpret the final sentence of Paragraph 509 to mean that such session of the General Conference shall be composed of the same delegates and equal in number as elected to the regular session of the General Conference unless the Annual Conference from which such delegates were elected determines to elect other persons to serve as replacement delegates. The elimination of Annual Conferences through transfer or merger by action taken subsequent to the regular session of the General Conference does not deprive delegates of such Annual Conferences who were elected to the 1964 General Conference of their right to be seated at the extra session.

Lastly, any remedies that are permitted herein to replenish the reserve delegates by an Annual Conference, must be limited in scope and effect. I believe that it is important to note the exigent circumstances and emphasize that these decisions have no precedential value in future circumstances because that falls within the scope of legislation which thus rests solely within the discretion and authority of General Conference.

Beth Capen

March 29, 2023