REPORT OF THE COMMITTEE ON

REVIEW OF PRESBYTERY RECORDS

TO THE FIFTY-THIRD GENERAL ASSEMBLY
OF THE PRESBYTERIAN CHURCH IN AMERICA

I. A list of Presbytery minutes received by the Committee

Except where otherwise noted, all minutes referenced are from 2025.

Arizona	Jan 23–24, May 2, Aug 29, Jan 23 (ES), Oct 24
Ascension	Jan 25, Apr 26, Jul 26, Nov 1
Blue Ridge	Jan 24–25, Apr 25–26, Aug 9, Nov 7–8, Nov 7 (ES)
Calvary	Jan 25, Apr 24, Jul 26, Oct 23, Jul 26 (ES)
Canada West	Mar 7, Oct 3, Feb 12, Aug 5
Catawba Valley	Jan 25, May 17, Sep 27
Central Carolina	Feb 22, Feb 22 (ES), May 27, Aug 23, Aug 23 (ES), Nov 18, Nov 18 (ES)
Central Florida	Jan 28, Jan 28 (ES), Apr 29, Apr 29 (ES), Jun 12, Aug 19, Oct 14, Nov 18
Central Georgia	Jan 24–25, Feb 18, May 13, Sep 9
Central Indiana	Feb 14, May 9, Sep 12, Nov 14
Chesapeake	Jan 18, Mar 11, May 13, Sep 9, Nov 8
Chicago Metro	Feb 19, May 21, Aug 20, Nov 19
Covenant	Jan 14, Feb 4, May 20, Oct 7, Jan 14 (ES)
Eastern Canada	Feb 28, Jun 6, Oct 24
Eastern Carolina	Jan 25, May 3, Jul 19, Oct 18, Aug 2
Eastern Pennsylvania	Feb 8, Apr 8, Sep 20, Nov 15
Evangel	Feb 11, May 13, Jul 8, Aug 12, Nov 11
Fellowship	Jan 25, Jan 25 (ES), Apr 26, Aug 16, Sep 25, Oct 28, Dec 4
Georgia Foothills	Jan 25, Apr 15, Sep 16, Dec 12
Grace	Jan 23, Mar 25, May 13, Sep 9
Great Lakes	Jan 11, Feb 20, May 3, Sep 19–20
Gulf Coast	Feb 10–11, May 13, Oct 14
Gulfstream	Feb 11, May 13, Nov 11, Dec 02
Heartland	Feb 1, Apr 25–26, Jul 10, Sep 26–27
Heritage	Jan 25, May 13, Jun 10, Sep 13, Nov 15
Highlands	Nov 12, 2024, Feb 22, May 6, Aug 2, Oct 9, Nov 11, Aug 2 (ES), Nov 11 (ES)
Hills and Plains	Feb 8, May 6, May 17, Oct 14, Oct 14 (ES), Feb 10, 2024 (ES), Jun 10, Aug 26
Houston Metro	Jan 17, Feb 27, Apr 14, Jul 10, Aug 15, Nov 10
Illiana	Jan 19, Apr 12, May 29, Jul 1, Oct 1, Oct 18
Iowa	Jan 11, Mar 8, May 3, Jul 12, Nov 8
James River	Jan 18, Apr 12, Jul 17, Sep 2, Oct 11
Korean Capital	Oct 7, 2024, Dec 15, 2024, Apr 7, Oct 6
Korean Central	Oct 8–9, 2024, Apr 8–9, Aug 10, Oct 14

Korean Eastern	Mar 11, Sep 16
Korean Northeastern	Apr 22, Sep 9
Korean Northwest	Apr 7–8, Oct 13–14
Korean Southeastern	Apr 7–8, Aug 11, Oct 6–8
Korean Southern	Oct 21, 2024, Jan 20, Apr 21
Korean Southwest	Mar 11, Sep 16
Korean Southwest Orange County	Mar 11, Sep 15, Dec 22
Lowcountry	April 22, Jun 10, Jul 26
Metro Atlanta	Jan 28, May 6, Sep 16, Jan 28 (ES)
Metropolitan New York	Jan 14, Mar 11, May 13, Sep 16, Nov 11, Jan 14 (ES), Sep 16 (ES)
Mississippi Valley	Feb 4, May 6, Aug 5, Nov 4, May 6 (ES), Nov 4 (ES)
Missouri	Jan 21, Apr 22, Jul 19, Aug 26, Sep 29, Oct 21
Nashville	Feb 11, Apr 29, May 19, Jun 16, Aug 12, Nov 11, Feb 11 (ES), Apr 29 (ES), Jun 16 (ES), Aug 12 (ES), Nov 11 (ES)
New Jersey	Mar 15, May 17, Jul 19, Sep 20, Nov 15
New River	Mar 1, Aug 2, Sep 4, Nov 8
New York State	Jan 25, Apr 26, Sep 26–27
North Florida	Feb 8, Mar 18, May 8, May 25, Sep 11, Nov 13
North Texas	Feb 7–8, May 2–3, May 2–3 (ES), Jul 26, Aug 8–9, Nov 7–8
Northern California	Feb 7, May 2, Aug 6, Oct 3
Northern Illinois	Feb 1, Mar 26, May 13, May 13 (ES), Jul 22, Sep 12, Sep 13
Northern New England	Feb 1, May 17, Oct 18, May 17 (ES)
Northwest Georgia	Jan 18, Jan 18 (ES), Apr 1, Aug 16
Ohio	Feb 1, May 3, Jul 30, Oct 4
Ohio Valley	Jan 25, May 20, Jul 26, Oct 21
Pacific	Jan 25, May 13, Jul 19, Oct 7
Pacific Northwest	Feb 6–7, Feb 7 (ES), May 8–9, Oct 9–10, Oct 9 (ES)
Palmetto	Feb 13, May 8, Aug 14, Sep 10, Nov 13
Pee Dee	Feb 13, Apr 26, Jul 26, Oct 23
Philadelphia	Jan 18, Jan 18 (ES), Mar 15, Mar 15 (ES), May 17, May 17 (ES), Jul 31, Sep 19, Sep 19 (ES), Dec 4
Philadelphia Metro West	Feb 22, May 3, Jul 31, Sep 20, Sep 20 (ES), Nov 18, Nov 18 (ES)
Piedmont Triad	Feb 1, Feb 1 (ES), May 8, May 20, Aug 9, Nov 13
Pittsburgh	Jan 25, Jan 25 (ES), Apr 5, Apr 5 (ES), Jul 26, Aug 28, Oct 18
Platte Valley	Feb 1, May 3, Aug 9, Nov 8, May 3 (ES)
Potomac	Jan 28, Mar 15, Jun 3, Sep 23, Nov 15
Providence	Feb 4, May 6, Jun 25, Aug 5, Nov 4, May 6 (ES)
Rio Grande	Jan 27–28, Apr 28–29, Sep 23–24
Rocky Mountain	Jan 23, Apr 24, Oct 1–2, Oct 2 (ES)

Savannah River	Jan 25, Apr 15, Jul 18, Aug 12, Oct 21
Siouxlands	Jan 24, Apr 24, Sep 25–26
South Coast	Jan 21–22, Apr 29–30, Sep 23–24
South Florida	Feb 15, May 13, Aug 12, Nov 4
South Texas	Jan 24–25, Apr 25–26, Aug 8–9, Oct 24–25, Aug 9 (ES), Oct 25 (ES)
Southeast Alabama	Jan 28, Apr 22, Aug 26, Oct 28
Southern Louisiana	Jan 25, Apr 26, Apr 26 (ES), Jun 3, Oct 25
Southern New England	Jan 18, Mar 19, Apr 25–26, May 20, Jun 5, Sep 20
Southwest Florida	Feb 8, Apr 3, May 13, Jun 19, Sep 13, Nov 11
Suncoast Florida	Feb 11, May 13, Jul 24, Sep 9, Nov 4, Dec 12
Susquehanna Valley	Jan 11, Feb 8, Mar 29, May 17, Sep 23, Nov 15
Tennessee Valley	Feb 8, May 10, Aug 12, Oct 28
Tidewater	Feb 1, May 8, Oct 2
Warrior	Jan 25, Feb 13, Feb 13 (ES), Apr 15, Apr 15 (ES), Jul 3, Oct 21
West Hudson	Feb 13, May 29, Sep 18, Nov 13
Westminster	Mar 8, Apr 26, Aug 9, Nov 8
Wisconsin	Jan 25, Apr 26, Jul 26, Oct 25, Oct 25 (ES), Jul 26 (ES)

II. Summary of recommendations on each Presbytery

Pres #	Presbytery	Page	Minutes Reviewed	EoS	Prev. EoS	Unsat.	Comm. Vote
1	**Arizona**	1410	5	1	7	-	62-1-1
2	**Ascension**	1412	4	-	-	-	63-0-0
3	**Blue Ridge**	1412	5	2	5	-	63-0-1
4	**Calvary**	1415	5	-	-	-	63-0-0
5	**Canada West**	1415	4	4	2	-	63-0-0
6	**Catawba Valley**	1416	3	1	1	1	54-9-0
7	**Central Carolina**	1419	7	-	-	-	61-0-0
8	**Central Florida**	1419	8	16	3	2	62-0-0
9	**Central Georgia**	1422	4	3	10	-	58-0-0
10	**Central Indiana**	1424	4	5	7	-	63-0-0
11	**Chesapeake**	1427	5	5	12	2	62-0-0
12	**Chicago Metro**	1431	4	6	18	1	46-13-1
13	**Covenant**	1435	5	8	2	1	60-2-0
14	**Eastern Canada**	1438	3	5	10	-	47-16-0
15	**Eastern Carolina**	1443	5	6	3	1	63-0-0
16	**Eastern Pennsylvania**	1444	4	6	2	-	64-0-0
17	**Evangel**	1445	5	-	1	-	63-0-0
18	**Fellowship**	1446	7	-	2	-	63-0-0
19	**Georgia Foothills**	1448	4	1	2	-	64-0-0
20	**Grace**	1449	4	4	1	-	52-9-0

21	**Great Lakes**	1452	4	3	-	-	64-0-0
22	**Gulf Coast**	1453	3	2	2	-	63-0-0
23	**Gulfstream**	1453	4	2	6	3	62-0-0
24	**Heartland**	1455	4	-	1	-	63-0-0
25	**Heritage**	1455	5	1	5	-	56-0-0
26	**Highlands**	1457	8	6	-	-	62-0-2
27	**Hills and Plains**	1457	8	-	3	1	63-0-0
28	**Houston Metro**	1458	6	3	6	-	64-0-0
29	**Illiana**	1460	6	3	10	-	64-0-0
30	**Iowa**	1463	5	14	5	-	61-0-2
31	**James River**	1467	5	3	13	9	61-0-0
32	**Korean Capital**	1471	4	2	15	2	61-0-1
33	**Korean Central**	1475	4	19	6	-	63-0-0
34	**Korean Eastern**	1479	2	3	24	2	63-0-0
35	**Korean Northeastern**	1484	2	1	-	-	61-0-0
36	**Korean Northwest**	1485	2	4	12	3	64-0-0
37	**Korean Southeastern**	1489	3	19	17	1	62-0-0
38	**Korean Southern**	1491	3	18	9	-	64-0-0
40	**Korean Southwest**	1512	2	2	15	2	64-0-0
39	**Korean Southwest Orange County**	1495	3	18	43	12	62-1-1
41	**Lowcountry**	1518	3	4	10	-	59-0-0
42	**Metro Atlanta**	1519	4	2	6	-	62-0-0
43	**Metropolitan New York**	1521	7	9	4	3	59-3-0
44	**Mississippi Valley**	1524	6	2	7	1	62-0-0
45	**Missouri**	1525	6	3	5	-	51-11-1
46	**Nashville**	1529	11	3	4	-	48-15-0
47	**New Jersey**	1532	5	2	8	-	63-0-0
48	**New River**	1535	4	1	19	8	60-0-0
49	**New York State**	1540	3	2	3	-	63-0-1
50	**North Florida**	1540	6	-	6	-	63-0-0
51	**North Texas**	1542	6	2	-	-	64-0-0
52	**Northern California**	1542	4	9	9	2	57-6-1
53	**Northern Illinois**	1546	7	2	17	1	65-0-0
54	**Northern New England**	1551	4	1	1	-	62-0-0
55	**Northwest Georgia**	1552	4	1	6	-	63-0-0
56	**Ohio**	1554	4	-	1	-	63-0-0
57	**Ohio Valley**	1555	4	1	5	1	61-2-0
58	**Pacific**	1560	4	6	7	1	40-20-0
59	**Pacific Northwest**	1563	5	2	6	-	56-8-0
60	**Palmetto**	1568	5	16	2	-	59-2-1
61	**Pee Dee**	1570	4	-	3	-	63-0-0
62	**Philadelphia**	1571	10	30	7	6	64-0-0
63	**Philadelphia Metro West**	1577	7	-	-	-	63-0-0

64	**Piedmont Triad**	1577	6	8	4	1	61-0-0
65	**Pittsburgh**	1580	7	3	2	-	57-0-0
66	**Platte Valley**	1581	5	3	3	1	60-0-0
67	**Potomac**	1583	5	1	3	-	60-0-0
68	**Providence**	1584	6	-	8	-	63-0-0
69	**Rio Grande**	1586	3	7	31	3	52-10-2
70	**Rocky Mountain**	1600	4	17	10	3	57-0-0
71	**Savannah River**	1605	5	3	-	-	61-0-0
72	**Siouxlands**	1605	3	5	12	1	61-0-0
73	**South Coast**	1609	3	4	20	12	59-0-0
74	**South Florida**	1616	4	3	7	-	59-0-1
75	**South Texas**	1618	6	1	4	1	62-1-0
76	**Southeast Alabama**	1619	4	13	11	4	61-0-0
77	**Southern Louisiana**	1623	5	-	-	-	63-0-0
78	**Southern New England**	1623	6	-	1	-	63-0-0
79	**Southwest Florida**	1623	6	-	-	-	63-0-0
80	**Suncoast Florida**	1623	6	3	2	-	62-0-0
81	**Susquehanna Valley**	1624	6	3	3	-	61-0-1
82	**Tennessee Valley**	1625	4	3	2	1	63-0-0
83	**Tidewater**	1626	3	2	3	-	64-0-0
84	**Warrior**	1627	7	-	2	-	62-1-0
85	**West Hudson**	1628	4	2	1	-	62-0-0
86	**Westminster**	1629	4	-	-	-	63-0-0
87	**Wisconsin**	1629	6	-	1	-	64-0-0

III. A list of Presbyteries that have not submitted required records or responses to the General Assembly:

a. A list of Presbyteries that have not submitted all approved responses to exceptions of Previous Assemblies required by *RAO* 16-10.b

Korean Southeastern Presbytery: 2025-01, 2025-02, 2025-07, 2025-09–2025-20
Korean Southern Presbytery: No Responses Received
Korean Southwest Orange County Presbytery: 2025-06–2025-09
Korean Southwest Presbytery: 2024-04
New Jersey Presbytery: 2024-01
New River Presbytery: 2024-02, 2024-04, 2025-12
Rio Grande Presbytery: 2025-65
Susquehanna Valley Presbytery: 2025-03

b. A list of Presbyteries that have not submitted records required by *RAO* 16-4.c

Gulfstream Presbytery — Physical: No Records Received
Philadelphia Presbytery — Physical: Standing Rules and Directory missing
Platte Valley Presbytery — Physical: No Records Received
Siouxlands Presbytery — Physical: Standing Rules and Directory missing

South Coast Presbytery — Physical: Standing Rules and Directory missing | Digital: Standing Rules and Directory missing

IV. A list of Presbyteries that have submitted Minutes after the March 15 deadline required by *RAO* 16-4.d

Canada West Presbytery — Physical: Apr 6
Central Carolina Presbytery — Physical: Apr 18
Georgia Foothills Presbytery — Physical: Mar 30 | Digital: Mar 30
Gulf Coast Presbytery — Physical: Mar 24
Houston Metro Presbytery — Physical: Mar 18
Iowa Presbytery — Physical: May 1 | Digital: Apr 27
James River Presbytery — Physical: Mar 24
Korean Capital Presbytery — Physical: Apr 20 | Digital: Apr 16
Lowcountry Presbytery — Physical: May 18 | Digital: May 12
New Jersey Presbytery — Physical: Mar 19
Pacific Northwest Presbytery — Physical: Mar 24
Philadelphia Presbytery — Physical: Apr 20 | Digital: Apr 14
Rio Grande Presbytery — Physical: Mar 19 | Digital: Mar 19
Siouxlands Presbytery — Digital: Apr 16
South Coast Presbytery — Physical: Apr 24 | Digital: Apr 21

V. Recommendations concerning received reports alleging important delinquency and/or grossly unconstitutional actions

2026-01: Central Florida Presbytery — Find that the June 20, 2025 letter from Mr. Gabriel Williams *et al.* is not a credible report of an "important delinquency or grossly unconstitutional proceedings" (*BCO* 40-5). *(See X.8.f, p. 1422)*

2026-02: Metro Atlanta Presbytery — Find that the September 18, 2025 letter from TE Andrew Flatgard and RE Spencer Flatgard is not a credible report of an "important delinquency or grossly unconstitutional proceedings" (*BCO* 40-5). *(See X.42.e, p 1521)*

2026-03: Iowa Presbytery — Find that the December 1, 2025 letter from Mr. and Mrs. Ron Kepford is not a credible report of an "important delinquency or grossly unconstitutional proceedings" (*BCO* 40-5). *(See X.30.e, p. 1466)*

2026-04: Arizona Presbytery — Find that the January 7, 2026 letter from Mr. Nate Curtisi is not a credible report of an "important delinquency or grossly unconstitutional proceedings" (*BCO* 40-5). *(See X.1.e, pp. 1411)*

2026-05: Iowa Presbytery — Find that the April 17, 2026 letter from Mr. and Mrs. Ron Kepford, Dr. and Mrs. Chad Carlson, Dr. and Mrs. Clinton Crowder, and Mr. Doug Peter is a credible report of "an important delinquency or grossly unconstitutional proceedings" (*BCO* 40-5). *(See X.30.e, p. 1466)*

VI. Concerning review of compliance with Standing Judicial Commission (SJC) Cases

a. Presbyteries that have not recorded the full decision in their minutes and/or have not provided a statement describing how the lower court has complied with any amends contained therein (*BCO* 40-2; *OMSJC* 17.1):

2023-18 — Sears v. Nashville *(See X.46.f, p. 1532)*
2023-21 — Kang v. Korean Central *(See X.33.e, p. 1478-1479)*
2024-05 — Bigelow v. North Florida *(See X.50.d, p. 1542)*
2024-22 — Smed v. Canada West *(See X.5.e, p. 1416)*

b. Presbyteries that have provided a statement describing how the lower court has complied with any amends contained therein (*BCO* 40-2; *OMSJC* 17.1):

2023-22 — Suh v. Korean Southeastern *(See X.37.g, p. 1491)*

c. Presbyteries that have not met following the receipt of the SJC ruling. The review will be deferred to next year's Committee on Review of Presbytery Records (*BCO* 40-2; *OMSJC* 17.1).

2023-05 — Hylands v. Chicago Metro *(See X.12.f, p. 1435)*
2024-02 — Gleason v. Houston Metro *(See X.28.e, p. 1460)*
2024-07 — PCA v. Columbus Metro *(See X.57.f, p. 1560)*
2024-13 — Colquitt v. Houston Metro *(See X.28.e, p. 1460)*
2024-20 — Fout v. Ohio Valley *(See X.57.f, p. 1560)*
2024-23 — Wildermuth v. Blue Ridge *(See X.3.e, p. 1415)*
2025-01 — Mullen v. South Florida *(See X.74.e, p. 1618)*
2025-02 — Donovan et al v. Northwest Georgia *(See X.55.e, p. 1554)*
2025-04 — Niziol v. Metro Atlanta *(See X.42.f, p. 1521)*
2025-06 — Bulkeley v. Highlands *(See X.26.d, p. 1457)*
2025-12-13 — Assis and Brown v. South Florida *(See X.74.e, p. 1618)*

d. Presbyteries that have recorded the full decision in their minutes and complied with any amends contained therein (*BCO* 40-2; *OMSJC* 17.1):

2024-01 — Moehn v. Westminster *(See X.86.c, pp. 1629)*
2024-16 — Mueller v. South Florida *(See X.74.e, p. 1618)*
2024-17 — Whittle v. Northwest Georgia *(See X.55.e, p. 1554)*
2024-18 — Harris v. Wisconsin *(See X.87.d, p. 1629)*
2024-28 — MacRae v. Susquehanna Valley *(See X.81.e, p. 1625)*
2025-03 — Sherfield v. Iowa *(See X.30.f, p. 1467)*

VII. Citations

a. Committee of Review of Presbytery Records

Korean Southwest Orange County Presbytery *(See X.39.g, pp. 1512)*
Philadelphia Presbytery *(See X.63.f, p. 1577)*
Rio Grande Presbytery *(See X.69.g, p. 1600)*

b. Standing Judicial Commission

Iowa Presbytery *(See X.30.e, p. 1466-1467)*

VIII. General Recommendations

1. Thank Hon. John Bise, Dr. Per Almquist, Alyssa Cho, Karen Cook, Ashley Davis, Karen Frey, Heidi Harrison, Angela Nantz, TE Billy Park and the rest of the AC staff who covered the needs and requests of CRPR in addition to their other duties. In particular, we commend them for their attentive support, friendly welcome, and support to the officers. *(64-0-0)*
2. Thank the staff of Mission to the World who allowed the Committee to use their building, and who endured disruption in their workplace during the meeting of the Committee. *(64-0-0)*
3. Commend the 2026 Committee on Review of Presbytery Records officers: TE Steve Tipton, TE Freddy Fritz, TE Thomas Rickard, and TE Ben Thomas for their work before and during the meeting of the Committee. Without that work, the Committee would not have been able to accomplish its tasks. *(64-0-0)*
4. Commend TE Thomas Rickard and Ms. Alyssa Cho for their tremendous labors in gathering and uploading the reports of the Read Teams and developing a draft report of the Committee. Their work dramatically increased the Committee's efficiency. *(64-0-0)*
5. The General Assembly asks Presbyteries to take note of the following issues that created problems for the Committee and for presbyteries during the 2026 review: *(64-0-0)*
    a. Failure to apply *BCO* 38-3 when a TE moves to a non-PCA call and/or failure to demonstrate whether or why Presbytery used part A or part B of that paragraph.
    b. Failure to correct previous minutes (where possible) as part of Presbytery's response to a previous exception of substance (*RAO* 16-10.b.1).
    c. Electing representatives to Committees of Commissioners of GA is an action that must be taken by Presbytery or a commission thereof and may not be delegated to an individual or a committee even when filling unexpected vacancies (*BCO* 15-2; *RAO* 14-2). Appointing one or two men to fill positions on Committees of Commissioners of the General Assembly is an apparent violation of *RAO* 14-2 and *BCO* 15-2.
    d. Presbyteries should take extra care to cite congregations or Sessions to appear by their commissioners before the dissolution of pastoral relations is acted on (*BCO* 23-1).
    e. Records of examinations must include all specific elements of the examination per *BCO* 19-2; 21-4 (*RAO* 16.3.e).
    f. Reasons for rulings on points of order must be recorded in the minutes (*RAO* 16-3.e.1).
    g. CRPR invites Presbytery responses to exceptions of substance using a form distributed to individual Presbyteries. When returning the response form, Presbyteries should fill in the date of the meeting at which the Presbytery approved the responses.
6. The General Assembly reminds the brethren that the appropriate course of action for dealing with alleged unconstitutional proceedings is ordinarily

through appeals (*BCO* 42) and complaints (*BCO* 43), rather than invoking the standard required under *BCO* 40-5. *(64-0-0)*

7. The Stated Clerk of the General Assembly send a letter to the Presbyteries through the stated clerks of the Presbyteries to include the following points: *(64-0-0)*

   a. Commend clerks for their hard work to create, keep, and submit their records, and every Presbytery who sent delegates to serve on the Committee on Review of Presbytery Records.

   b. Urge those Presbyteries who failed to send delegates to do so in the future, noting the great learning opportunities that exist through participation in the review process. Note that 75 of 87 Presbyteries had representatives appointed to the committee this year, with 65 attending the meeting (including 12 REs and 53 TEs).

   c. Encourage Presbyteries and clerks to review carefully the "Guidelines for Keeping Presbytery Minutes" from *RAO* 16-3 and the "Guidelines for Responding to General Assembly" from *RAO* 16-10, and to be sure that the requirements included in those sections are reflected in their minutes.

   d. Note the issues raised in recommendations 5 and 6.

   e. Note the following list of the 8 most common exceptions found during the 2025 review process (which matters accounted for over 50% of all exceptions), and urge clerks and Presbyteries to be particularly attentive to addressing these issues in their minutes, including, if necessary, correction of minutes from meetings in 2026 that occurred prior to the reception of this letter.

      i. Call-related exceptions (congregational/sessional approval, arrangements, dissolutions)

      ii. Incomplete examination records (candidates, licensure, ordinations, transfers)

      iii. Missing meeting minutes (executive, commission, referenced attachments, etc.)

      iv. No record of annual reports (interns, candidates, Out of Bounds TEs)

      v. No or incomplete review of Session records

      vi. Missing record of required voting thresholds

      vii. Missing required administrative items (six-month membership, ministerial obligation forms)

      viii. No record of judgment of stated differences

   f. Encourage Presbytery stated clerks to attend the annual Presbytery Clerks' Meeting in December.

   g. Encourage to double-check the Presbytery directory printed from the Presbytery portal for missing information.

IX. Recommendations concerning *RAO* amendments

None.

X. Report concerning the records of each Presbytery

1. That the Minutes of **Arizona Presbytery:** *(60-1-3)*
   a. Be approved without exception: **Jan 23, 2025 (ES); Oct 24, 2025**
   b. Be approved with exception of form: **Jan 23–24, 2025; May 2, 2025; Aug 29, 2025**
   c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 40-4; *BCO* 32-17) — Presbytery failed to disqualify a RE to sit as a judge in a judicial case who appears to have expressed his opinions of the merits of either party.

   d. **That the following responses to the 53rd GA be found satisfactory:**

2023-16: Aug 26, 2022 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

Response [2024]: No Response Received.

Response [2025]: Agree. Ordination exam of TE [Name Omitted] IAW 21-4 occurred before the Presbytery Ordination Committee on 10 August 2022 and the minutes of 26 August 2022 did not properly reflect that. In the future, Presbytery will be more detailed in our Presbytery minutes.

Rationale [2025]: Response does not indicate that the record has been corrected, nor does it explain how a committee can fulfill the examination requirement.

Response [2026]: We agree. We corrected the record at August 20, 2025 stated meeting to reflect TE had been examined on each of the items required by *BCO* 21-4c to the satisfaction of the Presbytery. We will strive to do better in the future.

2025-01: Jan 26, 2024 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

Response [2026]: We agree. When the candidate came before Presbytery for licensure on April 28, 2023, he submitted his stated differences, which were granted as exceptions. When he came to the January 26, 2024 stated meeting for ordination, he reported his stated differences had not changed since licensure; however we did not record this. Our records were corrected at the August 29, 2025 stated meeting.

2025-02: Jan 26, 2024 (*BCO* 8-6, 8-7; *BCO* 20-1, 21-1) — Reason for evangelist calls not recorded. Call to "Definite work" and assurance to maintain our system of doctrine and the integrity of the sacraments not recorded.

Response [2026]: We agree in part. We agree we did not properly record the reasons for the calls of the evangelists. The respective TEs had been previously appointed per *BCO* 5-3 and *BCO* 8-6 as evangelists when their calls had been approved. Our records should have clarified at the January 26, 2024 stated meeting their calls and terms were being renewed. Our records

were corrected at the August 29, 2025 stated meeting.

We respectfully disagree that we erred in failing to record the call to definite work and assurance to maintain proper doctrine and the sacraments. Our understanding is the requirements cited in *BCO* 20-1 and 21-1 do not require yearly renewal by our TEs. We are willing to be instructed and corrected on our understanding.

2025-03: Apr 26, 2024 (*BCO* 23-1) — No record of congregational meeting to accept the resignation of Teaching Elder.

Response [2026]: We agree. Minutes were corrected at August 29, 2025 stated meeting to include record of meeting. We will be more diligent in the future.

2025-04: Sep 6, 2024 (*BCO* 18-2) — No record of six months membership for candidate recorded.

Response [2026]: We agree. The record was corrected at August 29, 2025 stated meeting to include notation that candidate(s) were members of their respective churches for six months prior to filing applications to Presbytery. We will be more diligent in the future to comply with this requirement.

2025-05: Sep 6, 2024 (*BCO* 5-9.f (1); *BCO* 5-9.g, h) — Record of petition to particularize not recorded or approved by presbytery. Organizing pastor not elected by the members of the mission church. Call not approved or recorded by the presbytery.

Response [2026]: We agree. We did not properly record the petition we received to particularize. We also did not record the election of TE by members of his church. Record corrected on both matters at August 29, 2025 stated meeting. We will be more diligent in the future.

2025-06: Sep 6, 2024 (*BCO* 24-1) — Specific exams not recorded.

Response [2026]: We agree. We corrected our record at August 29, 2025 stated meeting to reflect REs had been examined on all aspects and exams of *BCO* 24-1. We will be more diligent to record these in the future.

e. **Concerning report alleging important delinquency and/or grossly unconstitutional actions:**

The General Assembly find the January 6, 2026 report from Mr. Curtisi, finds no sufficient evidence that Arizona Presbytery's actions rise to the level of an important delinquency or a grossly unconstitutional proceeding required by *BCO* 40-5.

Rationale: The report alleges a misconduct of the court in having a member of the panel rendering judgment who previously expressed his opinion of the merits to either party (*BCO* 31-17). While this action appears to be in violation of our constitution it does not rise to the high standard provided for in *BCO* 40-5.

Members of the SJC, TE Paul Lee and TE Steve Tipton, refrained from discussion and abstained from the vote on Arizona Presbytery.

2. That the Minutes of **Ascension Presbytery:** *(63-0-0)*
   a. Be approved without exception: **Jan 25, 2025; Apr 26, 2025; Jul 26, 2025; Nov 1, 2025**
   b. Be approved with exception of form: **None.**
   c. Be approved with exception of substance: **None.**

3. That the Minutes of **Blue Ridge Presbytery:** *(63-0-1)*
   a. Be approved without exception: **Nov 7–8, 2025; Nov 7, 2025 (ES)**
   b. Be approved with exception of form: **Jan 24–25, 2025**
   c. **Be approved with exception of substance:**
      2026-01: Apr 25–26, 2025 (*BCO* 21-4) — ¾ vote for extraordinary clause for ordination candidate not recorded.
      2026-02: Aug 9, 2025 (*BCO* 38-3) — No record that presbytery made determinations required by *BCO* 38-3.
   d. **That the following responses to the 53rd GA be found satisfactory:**
      2025-01: General 2024 (*BCO* 8-7) — No record of annual report of TE laboring out of bounds
      Response [2026]: Blue Ridge Presbytery disagrees with this exception. All TE laboring out of bounds are to submit the annual report to Presbytery for the April Stated Meeting per BRP Standing Rules. The minutes of the April and August 2024 minutes show that this requirement was completed by all TE who labor Out of Bounds.
      2025-02: Jan 26–27, 2024 (*BCO* PP 6) — No record that members of interim/provisional Session were called by the congregation
      Response [2026]: *BCO* 5 makes it clear that a mission church is governed by a temporary system of government created by the Presbytery not the members of the mission church. Presbytery is within its power to add or subrtract members of a BCO15-1 commission.
      2025-03: Jan 26–27, 2024 (*BCO* 21-4.f) — Presbytery granted a doctrinal exception that appears out of accord with our doctrinal standards whereas candidate states the administration of the sacrament of baptism should not be limited to Teaching Elders.
      Response [2026]: The Blue Ridge Presbytery (BRP) acknowledges the exception noted by the General Assembly. The BRP respectfully disagrees with the exception. Our minutes of 2025-03: Jan 26–27, 2024, recorded the following:
      Mr. [Name Omitted] was asked concerning his exceptions to the confession. His exception is as follows: The Westminster Confession 27.4, 28.2, 29.3 as well as the *WLC* #176 reference the necessity of a “minister of the word” to administer the

sacraments. I take this phrase to be specifically referring to a Teaching Elder. My difference hinges upon that interpretation. It is my belief that the administration of the sacraments ought always to be accompanied by the preached word and under normal circumstances and whenever possible a TE is the preferable administrator, but I see no reason to limit the administration to ONLY TE and not TE and RE. My reasons are as follows: 1. The parity of the elders makes it clear that the authority and office of both TE and RE is the same. It is not two offices, but one. 2. The Scriptures that give us the qualifications for elder make note that an elder especially gifted in teaching should be given double honor, but it does not, in my estimation, qualify that only those gifted in teaching ought to administer the sacraments.

M/S/P to consider the difference as more than semantic but not striking at the vitals of religion nor hostile to our system of doctrine and that the exception be answered with the presbytery's standard response. M/S/Failed that Mr. [Name Omitted] not be allowed to teach his view. M/S/P that the presbytery's standard response to the exception be recommitted to LDC for reevaluation and a recommendation.

We believe our minutes fulfill the requirements of *BCO* 40-2.3, which is the only citation provided by the General Assembly. We state clearly in our records the candidate's reasoning for this exception, and we state clearly that we found it more than semantic but not striking at the vitals of religion nor hostile to our system of doctrine, which is consistent with *BCO* 21-4.g and *RAO* 16.3.e.7. With regards to the request for further information as to the actions of the BRP on the date in question, we will provide the General Assembly further details as to our process, by which they should find that said proceedings were "wise, equitable, and suitable to promote the welfare of the church."

The meeting in which we discussed RE [Name Omitted]'s exception was unremarkable compared to our normal practice. While some disagreed with RE [Name Omitted] position, there was no rancor or divisiveness that threatened the unity of the body. Though we may have disagreed on whether or not to allow him to teach his position, we ultimately left the meeting with a joyful sense of having welcomed a brother into his new calling. In fact, the BRP has allowed the same exception twice before for current members of the court, so to disallow RE [Name Omitted]'s exception would both be inequitable and inconsistent with our practice.

As to the General Assembly's charge that the BRP "granted a

doctrinal exception that appears out of accord with our doctrinal standards," we agree with the General Assembly. The BRP did grant an exception. Any exception is by nature "out of accord with our doctrinal standards," but that does not mean it is necessarily "hostile to the system" or "strikes at the vitals of religion," which is how *BCO* 21-4 defines a presbytery's right to grant exceptions. The General Assembly's citation fails to demonstrate that such an exception is either a) "hostile to the system" and/or b) "strikes at the vitals or religion." Furthermore, RPR, as a committee of a higher court, is to "exhibit great deference to a lower court regarding those matters of discretion" (*BCO* 39-3).

Therefore, we hold that we have acted in good faith with the PCA's Constitution and established practices for the following reasons:

1. Distinction between private conscience and public submission: The PCA requires officers to receive and adopt the Confession and Catechisms sincerely but recognizes that some may have conscientious exceptions on non-fundamental points. By agreeing to abide by *BCO* 8-5 in practice, the teaching elder submits to the church's authority and order, even if privately holding a differing view.
2. Allowing humble exceptions that are not hostile to the system: We have already quoted from *BCO* 21-4 above. If the teaching elder's exception is held humbly and does not undermine the church's order or doctrine, it may be tolerated.
3. Precedent in handling exceptions: Many presbyteries have allowed exceptions on other doctrinal points when the exception is declared, held respectfully as an exception, and not practiced contrary to the standards. This precedent supports allowing a teaching elder to hold a private exception on *WCF* 27.4 with similar conditions.
4. Respect for the church's confessional integrity: By agreeing not to practice contrary to *BCO* 8-5, the teaching elder respects the church's confessional integrity and maintains peace and purity, which is a key requirement for exceptions.

Furthermore, searching through past RPR's decisions, this is the first time we could find where RPR has ever cited a Presbytery with an exception of substance because it licensed a man who took exception to *BCO* 8-5 and/or *WCF* 27.4. As previously stated, the BRP has ordained at least two men previously with such an exception, and no previous RPR has cited BRP for such an act. Granted, any RPR may recommend an exception of substance citation anytime it finds what it considers "apparent violations of the Scripture or serious irregularities from the

Constitution of the PCA, actions out of accord with the deliverances of the General Assembly and matters of impropriety and important delinquencies" (*RAO* 16-6.c.1). And it should. However, this exception has already been reviewed and accepted by past RPR committees and has been regarded by other Presbyteries as an allowable exception. If RPR wishes to establish precedence with this citation, we would request further detail as to its rationale for the citation and why it seeks to overturn the decision of all previous RPR committees.

Finally, we request that this response be received as satisfactory.

2025-04: Apr 26–27, 2024 (*BCO* 21-4.h; *RAO* 16-3.e.5) — Incomplete record of ordination exam

Response [2026]: There is no note of what was left out of the examination. Please provide the item which was not covered.

2025-05: Aug 10, 2024 (*BCO* 13-6) — Incomplete record of examination of TE transferring into Presbytery

Response [2026]: Both TE [Names Omitted] were examined in the area of Church Government. Presbytery failed to record that part of the examination. Presbytery agrees with the exception and will be seek to be more careful in the future. Presbytery will correct its record. (The Stated Clerk was involved in auto accident the Friday before the Stated Meeting. Presbytery elected a temporary clerk for the meeting which may have caused this oversight.

e. **Standing Judicial Commission (SJC) Compliance:**

Blue Ridge Presbytery has not met following the receipt of the SJC ruling. The review will be deferred to next year's Committee of Review of Presbytery Records (*BCO* 40-2.4; *OMSJC* 17.1.e-f).

2024-23 — Wildermuth v. Blue Ridge

4. That the Minutes of **Calvary Presbytery:** *(63-0-0)*

a. Be approved without exception: **Jan 25, 2025; Apr 24, 2025; Jul 26, 2025; Oct 23, 2025; Jul 26, 2025 (ES)**

b. Be approved with exception of form: **None.**

c. Be approved with exception of substance: **None.**

5. That the Minutes of **Canada West Presbytery:** *(63-0-0)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **Mar 7, 2025**

c. **Be approved with exception of substance:**

2026-01: Feb 12, 2025 (*BCO* 13-12) — Notice for called meeting not in order.

2026-02: Aug 5, 2025 (*BCO* 13-12) — Notice for called meeting not in order.

2026-03: Oct 3, 2025 (*BCO* 21-4) — Incomplete record of ordination exam.

2026-04: Oct 3, 2025 (*BCO* 21-4) — Incomplete record of ordination exam.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Mar 1, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Stated differences not recorded in the candidate's own words.

Response [2026]: The Clerk apologizes for not repeating the exceptions that were previously approved at the Presbytery's stated Meeting of March 2023 and only stating that "the approved exception taken at that meeting had not changed". The March 2024 minutes have been changed to include the previously quoted exception from March 2023.

2025-02: Mar 1, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

Response [2026]: The Clerk apologizes for the oversight and has amended the minutes to include the examination references inadvertently not recorded on PCA history, Greek and Hebrew Bible, and the candidate's education completed.

e. **Standing Judicial Commission (SJC) Compliance:**

Canada West Presbytery has not recorded the full decision in their minutes and/or has not provided a statement describing how the lower court has complied with any amends contained therein (*BCO* 40-2.4; *OMSJC* 17.1.e-f):

2024-22 — Smed v. Canada West

6. That the Minutes of **Catawba Valley Presbytery:** *(54-9-0)*

a. Be approved without exception: **Jan 25, 2025; Sep 27, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: May 17, 2025 (*BCO* 40-5; *BCO* 7-3) — Presbytery failed to cite the court next below of what appears to be an important delinquency or grossly unconstitutional proceeding (*BCO* 40-5). One of the courts next below acknowledged the existence of “deaconesses.” *BCO* 7-3 states “Furthermore, unordained people shall not be referred to as, or given the titles of, the ordained offices of pastor/elder, or deacon.” Deaconess is a feminized form of deacon.

d. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2023-01: Jan 22, 2022 (*BCO* 43-8) — Four timely and orderly complaints dismissed without a hearing.

Response [2024]: CVP responds by noting that these four complaints were in fact adjudicated by a Commission but the Commission was unable to proceed after reviewing the complaints, finding all four complaints to be “out of order administratively,” in that they were not filed against an action of a court (*BCO* 43-1). CVP was also notified by the Complainant’s civil attorney that the Complaiant desired to withdraw his complaints and to receive no further interaction with CVP concerning these matters.

Rationale [2024]: No record that Presbytery corrected its actions (*RAO* 16-10.b.1). Presbytery has not rescinded the unconstitutional denial of the complaints. The complaints were, in fact, against actions of a court (*BCO* 43-1), and it was improper to dismiss the complaints as "out of order administratively" on the stated grounds without affording the Complainant the right of a hearing. A purported subsequent withdrawal of a complaint could dispose of a complaint only after an unconstitutional action is rescinded.

Response [2025]: CVP responds by acknowledging that it erred in that it should first have determined that the matter was "administratively out of order" before forming a commission (*BCO* 43.8). The commission also erred in that it was improper to dismiss one complaint as "out of order administratively" on the stated grounds given. The wording in the commission's report admits to some adjudication of the complaint, which was out of order and was not a strict judgment based on *BCO* 43:1. CVP affirms to the General Assembly that it will follow the order found in *BCO* 43:8, and it will follow the order and steps used by the *SJC* found in *OMSJC* 9.1 and 9.2. Moreover, CVP affirms that it will seek to provide the proper grounds for any ruling in future cases. CVP adds that it was notified by the Complainant's civil attorney that the Complainant has withdrawn his complaints and desires no further interaction with CVP concerning these matters. The Complainant is no longer a member of any congregation of the PCA. This has the effect of rendering the Complaints administratively out of order in the same fashion as the *SJC* acted in case *SJC* 2022-15 (RE Terry Murdock vs. South Florida Presbytery) and *SJC* 2022-15 (Mr. Peter Benyola vs. Central Florida Presbytery).

Rationale [2025]: No record that Presbytery corrected its actions (*RAO* 16-10.b.1). Presbytery has not rescinded the unconstitutional denial of the complaints. The complaints were made by a member in good standing of the PCA at the time of filing and at the time of the adjudication of the complaints. Furthermore, the complaints were against actions of a court (*BCO* 43-1). Therefore, it was improper to dismiss the complaints as "out of order administratively" on the stated grounds without affording the Complainant the right of a hearing. A purported subsequent withdrawal of a complaint could dispose of a complaint only after an unconstitutional action is rescinded. (See the Response of Northwest Georgia Presbytery to exception of substance 2023-01 for a satisfactory response to the same error.)

Response [2026]: This exception of substance concerns a complaint filed against the ** Session in 2021 which was ruled

"administratively out of order" by a Commission of CVP (Minutes of 31st Meeting of CVP, January 22nd, 2022, pp. 4-5), a decision that was appealed to CVP and remanded to the same Commission on January 22nd, 2022.

At the time of his appeal, the Complainant was a member of the PCA in good standing, and therefore he should have been granted a hearing before the Commission appointed by CVP to adjudicate the appeal (*BCO* 43-8), but on March 3rd, 2022, the Clerk of CVP received a letter from the Appellant's attorney stating that "my client no longer desires to communicate with or receive communications from *** Church PCA or the Catawba Valley Presbytery." On March 4th, 2022, the Commission approved a suspension of process due to this communication until it could be determined whether the Appellant desired to abandon his appeal. A letter was drafted and sent to the attorney by the Stated Clerk of CVP via certified mail to determine the Appellant's intentions. On April 13th, 2022, the Stated Clerk received communication from the Appellant's lawyer stating that the Appellant desired to abandon his appeal, rendering the entire matter moot, as he had withdrawn himself from the jurisdiction of the PCA.

The Commission reported to CVP on May 24th, 2022 (32nd Meeting of CVP, Appendix #5) that the complaint and appeal had been vacated by the Complainant who had apparently withdrawn from the PCA; however, during this process when the Complainant was still a member of the PCA, he was apparently not granted an opportunity to be heard as directed by *BCO* 43-8.

Therefore, CVP agrees with this exception of substance approved by the 2025 General Assembly that CVP did not grant the Complainant an opportunity to be heard before it ruled his complaint to be "administratively out of order" while he was still a member of the PCA. Consequently, at its stated meeting on January 24th, 2026, CVP reconsidered its unconstitutional action of January 22nd, 2022 of finding the complaint "administratively out of order" without giving the Complainant an opportunity to be heard when he was a member of the PCA. However, since the Complainant in question has requested through his attorney to have no contact with CVP, his withdrawal from the PCA makes it impossible for him to be heard now in a PCA court.

Since Roberts Rules of Order (12th Edition) 35:6c states that an action that is impossible to undo cannot be rescinded, CVP finds that by parliamentary rule it is unable to rescind this action. Still, it does express to the GA that it acknowledges its

error in denying the Complainant a hearing while he was a member of the PCA, and promises to adjudicate all complaints it may receive in the future in strict adherence to the provisions of the Book of Church Order.

Rationale [2026]: No record that Presbytery corrected its actions (*RAO* 16-10.b.1). Presbytery has not rescinded the unconstitutional denial of the complaints. The complaints were made by a member in good standing of the PCA at the time of filing and at the time of the adjudication of the complaints. His attorney's request to discontinue contact does not make Presbytery's correction of its action impossible. Additionally, Presbytery should consult RONR 35:2.2. A motion to Rescind "Can be applied to anything (e.g., bylaw, rule, policy, decision, or choice) which has continuing force and effect and which was made or created at any time as the result of the adoption of one or more main motions."

7. That the Minutes of **Central Carolina Presbytery:** *(61-0-0)*
   a. Be approved without exception: **Feb 22, 2025; Feb 22, 2025 (ES); Aug 23, 2025 (ES); Nov 18, 2025; Nov 18, 2025 (ES)**
   b. Be approved with exception of form: **May 27, 2025; Aug 23, 2025**
   c. Be approved with exception of substance: **None.**

8. That the Minutes of **Central Florida Presbytery:** *(62-0-0)*
   a. Be approved without exception: **Jan 28, 2025 (ES); Apr 29, 2025 (ES); Oct 14, 2025**
   b. Be approved with exception of form: **None.**
   c. **Be approved with exception of substance:**

2026-01: General 2025 (*RAO* 16-10.a) — No record in minutes of exceptions taken by GA.

2026-02: Jan 28, 2025 (*BCO* 13-10) — No record of transfer or dismissal of members upon dissolving a church.

2026-03: Jan 28, 2025 (*BCO* 38-1) — Full *BCO* 38-1 Confession for case without process not recorded in minutes.

2026-04: Jan 28, 2025 (*BCO* 15-2) — Ordination commission only had one RE.

2026-05: Apr 29, 2025 (*BCO* PP 6) — No record that members of interim/provisional Session were called by the congregation when two elected elders were still serving].

2026-06: Apr 29, 2025 (*BCO* 13-11) — Complaint sent to Presbytery not recorded in Presbytery's minutes.

2026-07: Apr 29, 2025 (*BCO* 21-4; *RAO* 16-3.e.7) — Stated differences not judged with the prescribed categories.

2026-08: Jun 12, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

2026-09: Aug 19, 2025 (*BCO* 13-11) — Complaint sent to Presbytery not recorded in Presbytery's minutes.

2026-10: Aug 19, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

2026-11: Aug 19, 2025 (*BCO* 13-11) — Complaint sent to Presbytery not recorded in Presbytery's minutes.

2026-12: Aug 19, 2025 (*BCO* 13-11) — Complaint sent to Presbytery not recorded in Presbytery's minutes.

2026-13: Nov 18, 2025 (*BCO* 13-11) — Complaint sent to Presbytery not recorded in Presbytery's minutes.

2026-14: Nov 18, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — No record of ordination exam.

2026-15: Nov 18, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery.

2026-16: Nov 18, 2025 (*BCO* 43-2) — A complaint cannot be denied and ruled out of order; one or the other determination must be made.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 (*BCO* 13-9.b; *BCO* 40-1) — Incomplete record of review of records of church

Response [2026]: Presbytery agrees with the exception and promises to be more careful in the future. We have established a Review of Session Records Commission and procedures to correct such oversights. Every Session record has been reviewed except one, which has been cited for delinquency.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2024-01: Jan 17, 2023 (*BCO* 20-8) — No record commissioners appointed by the church presented and prosecuted the call of a TE before Presbytery.

Response [2025]: Agreed that there is no explicit record of named commissioners actually presenting and prosecuting the call. But there is record that the call was reviewed and the terms were approved, which surely assumes it was presented and prosecuted. Previous "Guidelines to Exceptions" do not list the failure to explicitly state that named commissioners presented and prosecuted the call as an "exception of substance." In the future, will this level of detail qualify under *RAO* 16-6.c.1) as an "Exception of Substance"? Will this be considered a "serious irregularity" or "important delinquency"?

Rationale [2025]: Presbytery must respond following the pattern of *RAO* 16-10.b.

Response [2026]: Presbytery respectfully disagree with the currect judgement of "unacceptable response." We are cited because "Presbytery must respond following the pattern of *RAO* 16-10.b." We were explicit that we "agreed" concerning the lack of names but we questioned the requirement for presbytery to

specifically note the names of those who prosecuted the call.

In our initial response we wrote:

"Agreed that there is no explicit record of named commissioners actually presenting and prosecuting the call. But there is record that the call was reviewed and the terms were approved, which surely assumes it was presented and prosecuted. Previous "Guidelines to Exceptions"do not list the failure to explicitly state that named commissioners presented and prosecuted the call as an "exception of substance."

Rationale [2026]: Presbytery must respond following the pattern of *RAO* 16-10.b. Presbytery does not need to provide names of individuals who prosecuted the call. However, Presbytery needs to correct the record to indicate that the call was prosecuted by appointed commissioners as required by *BCO* 20-8.

2024-02: Apr 18, 2023 (*BCO* 20-8) — No record commissioners appointed by the church presented and prosecuted the calls of TEs before the Presbytery.

Response [2025]: Agreed that there is no explicit record of named commissioners actually presenting and prosecuting the call. But there is record that the call was reviewed and the terms were approved, which surely assumes it was presented and prosecuted. Previous "Guidelines to Exceptions" do not list the failure to explicitly state that named commissioners presented and prosecuted the call as an "exception of substance." In the future, will this level of detail qualify under *RAO* 16-6.c.1) as an "Exception of Substance"? Will this be considered a "serious irregularity" or "important delinquency"?

Rationale [2025]: Presbytery must respond according to the pattern of *RAO* 16-10.b.

Response [2026]: Presbytery respectfully disagree with the current judgement of "unacceptable response." We are cited because "Presbytery must respond following the pattern of *RAO* 16-10.b." We were explicit that we "agreed" concerning the lack of names but we questioned the requirement for presbytery to specifically note the names of those who prosecuted the call.

In our initial response we wrote:

"Agreed that there is no explicit record of named commissioners actually presenting and prosecuting the call. But there is record that the call was reviewed and the terms were approved, which surely assumes it was presented and prosecuted. Previous "Guidelines to Exceptions"do not list the failure to explicitly state that named commissioners presented and prosecuted the call as an "exception of substance."

Rationale [2026]: Presbytery must respond following the pattern of *RAO* 16-10.b. Presbytery does not need to provide names of

individuals who prosecuted the call. However, Presbytery needs to correct the record to indicate that the call was prosecuted by appointed commissioners as required by *BCO* 20-8.

f. **Concerning reports alleging important delinquency and/or grossly unconstitutional actions:**

The General Assembly find the June 20, 2025, letter from RE Gabriel Williams et al. is not a report of an "important delinquency or grossly unconstitutional proceedings" (*BCO* 40-5).

Rationale: The report alleged that the Presbytery failed to suspend a judgment upon the giving of verbal notice of appeal (*BCO* 42-4 and 42-6). The Presbytery upheld the moderator's interpretation that a written notice of appeal was required before the judgment was suspended. This does not rise to the level of a grossly unconstitutional act.

9. That the Minutes of **Central Georgia Presbytery:** *(58-0-0)*

a. Be approved without exception: **Feb 18, 2025; Sep 9, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 13-9.b; *BCO* 40-3) — Results of review of records of church Sessions not stated.

2026-02: Jan 24–25, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session.

2026-03: May 13, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 (*BCO* 8-7; *BCO* 8-8) — No record of annual report(s) of TE(s) laboring out of bounds.

Response [2026]: In 2024, there were two TEs laboring out of bounds in accordance with *BCO* 8-7. One TE's status was misrepresented as Out of Bounds where it should have been Honorably Retired. That change has been made.The other TE had been laboring Out of Bounds less than one year. His report is attached. Greater attention will be given to ensure that the presbytery database is maintained up to date as to TE classifications.

2025-02: General 2024 (*BCO* 8-7) — No record of annual report(s) of TE(s) without a call.

Response [2026]: In 2024, there were two TE's without calls. One had been without call for less than one year. His report was received at the September 2025 meeting and is attached. The other TE has taken an administrative position at a church and has been removed from the TE database. Greater attention will be given to ensure that the presbytery database is maintained up to date as to TE classifications.

2025-03: Mar 19, 2023 (*BCO* 21-10) — For installations of assistant pastors,

the constitutional questions are to be addressed to the Session, rather than the congregation.

Response [2026]: Presbytery acknowledges this oversight. The minutes of the commission were reviewed and it was determined that a quorum of the session was in attendance at the congregational meeting. Therefore, in effect, the charge was given to the session. The Presbytery promises to be more attentive to the *BCO* 21-10 charge for pastors and assistant pastors.

2025-04: Jan 19, 2024 (*BCO* 46-6; *BCO* 13-7) — No record of when a man who was transferred to another presbytery was received by that presbytery.

Response [2026]: Presbytery acknowledges that the minutes only show approval of the transfer of the TE and not the fact that the transfer was completed. In fact, the transfer of the TE was completed on 2/6/2024 and documented in the CGP portal. The presbytery promises to be more attentive in the future to denote in the minutes that a transfer has been completed.

2025-05: May 14, 2024 (*BCO* 21-4c) — Extraordinary clause recorded to have been passed with 2/3 vote. This is less than the 3/4 vote required by *BCO* 21-4c.

Response [2026]: Presbytery acknowledges this oversight in referencing a 2/3 vote for the extraordinary clause provision of *BCO* 21-4c rather than a ¾ vote. However, the actual vote was unanimous. The minutes have been corrected to denote passage by a ¾ vote. Presbytery promises to be more attentive in the future regarding the vote requirement.

2025-06: May 14, 2024 (*BCO* 20-1; *RAO* 16-3.e.6) — Specific arrangements of call not shown to be approved.

Response [2026]: *RAO* 16-3.e.6 addresses the requirement of the candidate differing with the confessional standards not the ministerial call arrangements. *RAO* 16-7 addresses the ministerial call arrangement. In both cases involving ministerial calls, it is noted, " MSP to approve .... call from ..." This approval should suffice for denoting that the call arrangements were in order. *RAO* 16-3.e.7 states that the call document "need not be attached to the minutes."However, in the future Presbytery will be more specific to use the similar words in *RAO* 16-7 regarding the call arrangements.

2025-07: May 14, 2024 (*BCO* 23-1) — No record that there was a meeting of the congregation and whether or not they concurred with the request for dissolution of pastoral relations.

Response [2026]: The Presbytery agrees with RPR that the Temporary Session did not call a Congregational Meeting, per *BCO*, to vote on the resignation of the pastor. There was a meeting with the

congregation after a worship service to explain the pastor's resignation wherein they understood his reasoning and bid him farewell. There was question as to whether a Congregational Meeting was in order since [Church Name Omitted] was a mission church. Regardless, however, the pastor had been gone for some time before Presbytery became aware of the exception and it was impractical at that time to take corrective action by calling a Congregational Meeting. The Presbytery promises to be more careful in the future.

2025-08: May 14, 2024 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission incomplete.

Response [2026]: There are two commission minutes in the minutes for May 14 so it's unclear which minutes are referenced in the exception. They both appear to contain the requirements of *BCO* 15-1 and *RAO* 16-3.e.4. One set has the word "signed" for recorder and convener. The required signature has been provided. Presbytery will be more attentive in the future to ensure that commission minutes are properly signed.

2025-09: Sep 10, 2024 (*BCO* 18-2) — No record of endorsement by candidate's Session

Response [2026]: Presbytery acknowledges that specific endorsements by the candidate's Session are not included in the minutes; only that the candidate had been a member of his respective church for six months. However, in each case, the pastor affirmed that the candidate was in accord with *BCO* 18-2. Presbytery promises to be more attentive in the future to include in the minutes the requirement of *BCO* 18-2.

2025-10: Sep 10, 2024 (*BCO* 23-1) — No record that there was a meeting of the Session and whether or not they concurred with the request for dissolution of pastoral relations.

Response [2026]: At a session meeting on August 7, 2024, the session approved the dissolution of the pastoral relationship of the [Church Name Omitted] Assistant Pastor. The minutes of that meeting are attached.

10. That the Minutes of **Central Indiana Presbytery:** *(63-0-0)*

a. Be approved without exception: **Sep 12, 2025; Nov 14, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*RAO* 16-10.a) — No record in minutes of exceptions taken by GA.

2026-02: Feb 14, 2025 (*BCO* 19-16) — ¾ vote for waiving internship requirement not recorded.

2026-03: Feb 14, 2025 (*BCO* 18-2) — No record of six months membership for candidate.

2026-04: May 9, 2025 (*BCO* 19-16) — ¾ vote for waiving internship requirement not recorded.

2026-05: May 9, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-01: General 2023 (*BCO* 8-4) — No record of reports from TEs in work needful to the Church received.

Response [2025]: No Response Received.

Response [2026]: Central Indiana Presbytery does not have any TEs working in the *BCO* 8-4 category of "work needful to the Church." We will make sure to make this more explicit in future years, and if TEs in work needful to the Church become a reality in the CIP then we will keep record of their reports.

2024-02: General 2023 (*BCO* 13-2) — No record of reports from TEs without call received.

Response [2025]: No Response Received.

Response [2026]: We apologize for this oversight. Our Pastoral Care Team, who oversees this work, will have reports from TEs without call in our future minutes. Central Indiana Presbytery has already begun progress in this area, and we have attached one report for reference.

2024-03: Feb 10, 2023 (*BCO* 13-6) — Incomplete record of examination of TE transferring into Presbytery.

Response [2025]: No Response Received.

Response [2026]: We did in fact examine the TE transferring in all the required areas, but we failed to record it appropriately. The clerk has edited the minutes of that meeting (2/10/2023), and the presbytery approved those minutes, as corrected, at our Stated Meeting on February 13, 2026. We have attached the corrected and approved minutes for reference (Attachment B).

2024-04: Jun 26, 2023 (*BCO* 25-11) — No record of the congregation being given at least 30 days'notice of any meeting where the congregation voted on withdrawal from the PCA.

Response [2025]: No Response Received.

Response [2026]: The clerk and moderator of the CIP were informed by the session clerk of [Church Name Omitted] that the session did indeed give the congregation the requisite 30-days' notice. We received this correspondence via email. We apologize for not including this explicitly in the minutes of the CIP Called Meeting on June 26, 2023. For your convenience, attached is the email that the moderator and clerk of the CIP received from the session clerk of [Church Name Omitted], dated June 13, 2023. Again, we apologize for failing to include this in our minutes.

2024-05: Oct 2, 2023 (*BCO* 19-6) — 3/4 vote for previous experience

equivalent to internship not recorded.

Response [2026]: We recognize that *BCO* 19-16 instructs us to approve "previous experience as equivalent to the internship," and that this must be a three-fourths (3/4) vote. The clerk apologizes for this mistake and will correctly record this in future minutes. Regarding the particular exam in question, the body approved his previous experience unanimously, but the clerk failed to record that the threefourths requisite was met. We apologize.

2025-01: General 2024 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

Response [2026]: We apologize for this oversight. Our Pastoral Care Team, who is tasked with this work, has been reminded of their duty to provide these reports. We will have these annual reports in our future minutes. The CIP has already begun progress in this area, and we have attached one report for reference (Attachment D).

2025-02: 15 Nov, 2024 (*BCO* 13-12) — Notice of Called Meeting not in order. Presbytery did not provide the minimum 10-day notice.

Response [2026]: The error here is that the clerk failed to include the notice of the Called Meeting in the minutes of the Called Meeting on November 15. It only appears that the first notice was given at the November 8 Stated Meeting because the clerk failed to note the date of the original calling of the meeting. The November 15 Called Meeting was called by the CIP Steering Team and notice was given to the fathers and brothers on October 17, 2024, satisfying the requisite 10-day notice. At the September 13 Stated Meeting, a motion was passed to cite [Church Name Omitted] to appear before the body at a called meeting in November. For your convenience, here is the notice that was sent to the CIP on Oct. 17:

The Moderator and the Stated Clerk have determined that CIP will have that Called Meeting at 1:00 p.m. on November 15, 2024, at [Church Name and Location Omitted], in accordance with the motion passed at our last meeting, which reads: "to cite [Church Name Omitted] session (or a representative thereof) to appear at a called meeting in November after the next Stated Meeting at a time to be determined by the moderator and the clerk in conjunction with the relevant parties." Friday November 15 at 1 p.m. works well for the parties involved.

Then, at the November 8 Stated Meeting, the Moderator reminded the body of the already-called Called Meeting, set for the following Friday (Nov. 15). Additionally, the clerk sent a final reminder of the Called Meeting on Nov. 14 (also, we are happy to share this correspondence, if desired).

So, the initial citation of [Church Name Omitted] to appear at a called meeting (in November) was on Sept. 13. Then, after working with the parties involved to secure a date, notice was officially given to the CIP on October 17 (see above). We then reminded the body of the called meeting at our Nov. 8 stated meeting. And finally the clerk provided a reminder email on Nov. 14. The clerk failed to clearly communicate these details in the minutes of the called meeting on November 15. We apologize for this oversight.

11. That the Minutes of **Chesapeake Presbytery:** *(62-0-0)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Jan 18, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before dissolving pastoral relations.

2026-02: Mar 11, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before dissolving pastoral relations.

2026-03: May 13, 2025 (*BCO* 19-9) — No record of examination for internship.

2026-04: Sep 9, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before dissolving pastoral relations.

2026-05: Nov 8, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before dissolving pastoral relations.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-01: Mar 14, 2023 (*BCO* 19-2.f; *RAO* 16-3.e.5) — Presbytery approved a candidate for licensure whom they judged held a view that was hostile to the system or striking at the vitals.

Response [2025]: We appreciate the RPR's diligence and recognize Presbytery's action was irregular, though we believed it to be appropriate in this case. We would offer the following rationale as to why we made this decision: 1) The candidate was already serving as a pastoral intern at one of our churches and was seeking to fulfill all of the formal internship requirements of *BCO* 19-7ff, which includes the testing of his preaching and teaching gifts. In order for the intern to do this adequately, we believed licensure would be necessary. 2) At our Presbytery meeting in March, members of the Session where the candidate was serving as a pastoral intern made clear that they agreed with Presbytery with respect to the assessment of the candidate's particular view on remarriage, and that they would be working with the candidate to encourage him to reconsider his view in light of Scripture and the standards and that they would ensure he not teach or preach this view to the congregation. 3) The candidate seemed humble and teachable and so we believed

giving some additional time to reconsider the view while working closely with the Session of the church where he was serving and fulfilling his internship requirements would be the kindest and most reasonable approach. 4) At the end of the examination on the floor of Presbytery, it was made clear to the candidate by the chair of the Leadership Development Committee that unless the candidate's view changed to be in accord with our system of doctrine, he would not be able to be ordained in our Presbytery. 5) As noted in the minutes, we also instructed the candidate that he "not teach, preach, or counsel his exception to the standards."

Rationale [2025]: *BCO* 19-2.f is explicit that "The court may grant an exception to any difference of doctrine ONLY if in the court's judgment the applicant's declared difference is not out of accord with any fundamental of our system of doctrine because the difference is neither hostile to the system nor strikes at the vitals of religion." (emphasis added) This language does not give Presbytery the authority to grant an exception that is hostile to the system of doctrine or strikes at the vitals, even if Presbytery believes there are special circumstances.

Response [2026]: Chesapeake Presbytery agrees with this exception. The candidate's licensure was terminated at the January 17, 2026 meeting of CP, per *BCO* 19-6.

2025-01: General 2024 (*BCO* 19-7; *BCO* 19-8; *BCO* 19-9; 19-10) — Internships are established for men at the July, September, and November meetings, but there is no record of the specifics of the internships or of the required exams, and no evidence that the required record was made. Further, in 3 of the cases there is no record in the minutes or the Directory that the men were candidates

Response [2026]: Chesapeake Presbytery agrees with this exception and will include additional specifics with respect to internships in the future. As for the final comment with respect to the Directory, the Directory needed to be updated to reflect who is currently an intern, under care, etc... and this has now been done.

2025-02: General 2024 (*BCO* 19-12) — No reports on interns at each stated meeting.

Response [2026]: Chesapeake Presbytery agrees with this exception. Beginning in November 2024, we began to include (and approve) intern reports at each stated meeting of Presbytery. Our 2025 minutes reflect this change in our practice.

2025-03: General 2024 (*BCO* 8-7; *BCO* 13-2) — No annual reports for TEs without call and missing reports for TEs who are serving out of bounds.

Response [2026]: Chesapeake Presbytery agrees with this exception. We apologize for our error and will begin to record this in the

minutes.

2025-04: General 2024 (*BCO* 40) — Of the 36 churches in Presbytery, 11 have no mention of any review of their minutes and 10 have evidence of reviews of prior year's minutes, but not of 2023 minutes. Further, there is no record that Presbytery required responses to exceptions of substance.

Response [2026]: Chesapeake Presbytery disagrees with this exception. It may be the case that some 2023 minutes were not fully reviewed and approved until early 2025 (and so not included in the 2024 CP minutes sent to RPR), but all churches in the Presbytery have submitted 2023 minutes and have had them reviewed, with the exception of one church, which has received a citation from Presbytery. When there are exceptions of substance, we do require a response and include that response in our record.

2025-06: Mar 12, 2024 (*BCO* 46-6; *BCO* 46-7) — A TE is received from another PCA Presbytery with the understanding that the other Presbytery will issue a certificate of transfer. There is no record in subsequent minutes that the transfer certificate was ever received, and the TE was installed without reference to the certificate having been received.

Response [2026]: Chesapeake Presbytery agrees with this exception and will work to improve clarity with respect to transfers in the future. For information purposes, the certificate was received on March 16, 2024 from Potomac Presbytery. We have made a marginal notation in our March 12, 2024 minutes with respect to this.

2025-07: Mar 12, 2024 (*BCO* 32; *BCO* 31-2; *BCO* 34; *BCO* 38-1; *RONR* (12th ed) 48:14, 35:13) — Presbytery votes to "strike from the minutes of its 86th Meeting of the Presbytery [which would have been over 3 years prior] where it erroneously records that TE [Name omitted] was suspended from the sacraments." Presbytery then votes to instruct the Stated Clerk to "communicate the judgment of CPJC" to the TE, which judgment was the censure of deposition for the sin of failing to manage his household well. There is no record of the 2/3 vote needed to amend previous minutes. Further, there is no record of any formal process, of a case without process, or of any report as to how this matter came about. It is not clear if this is a new censure or if it is imposing what Presbytery intended to impose at the 86th meeting. Either is constitutionally dubious at this point.

Response [2026]: Chesapeake Presbytery agrees with this exception and apologizes for our oversight in not recording our minutes correctly. Regarding the first issue of amending our previous minutes, we did have a 2/3 majority vote. We have made a marginal notation in our minutes to reference this exception

response. Secondly, regarding the censure of the deposition of TE, this was a trial that rendered a guilty verdict and a judgment of deposition. Presbytery failed to include the minutes of the commission and final judgment in our submitted minutes. The minutes were approved but not submitted to the General Assembly for Review. We have submitted them to this year's General Assembly for Review. Presbytery also assigned the TE to membership in a church within our Presbytery per *BCO* 46-8. Chesapeake Presbytery apologizes once more and promises to be more circumspect in the future regarding keeping appropriate vote counts and submitting approved minutes.

2025-09: May 14, 2024 (*BCO* 13-2; *BCO* 22-5; *BCO* 22-6) — A TE from some other body (it is not specified whether he is from another PCA Presbytery) is examined for licensure to serve as stated supply at a church. There is no record the Session made a request for stated supply or that the other body consented to have the TE serve within the bounds of Chesapeake Presbytery.

Response [2026]: Chesapeake Presbytery agrees with this exception. The TE in question holds his credentials at Piedmont Triad. Piedmont Triad approved his call on May 11, 2024. There was an error in not including as an appendix the letter from the church requesting that he serve as Stated Supply.

2025-10: May 14, 2024 (*BCO* 23-1) — No record that the congregation was cited to appear before Presbytery in a matter of the dissolution of a pastoral call.

Response [2026]: Chesapeake Presbytery agrees with the exception and will be more mindful of this requirement in the future. The congregation was in support of this dissolution (as the TE was moving to Honorably Retired status), but this should have been noted in our minutes and the congregation cited to appear.

2025-11: Nov 9, 2024 (*BCO* 18-6; *BCO* 19-12) — There are what appear to be annual reports for some candidates and interns, but many of the names do not match the names in the Directory and vice versa, and it is clear that there were not annual reports for all candidates and interns. Further, these is no record of reports from seminary instructors for candidates still in seminary.

Response [2026]: Chesapeake Presbytery agrees with this exception. The problem was with the directory which has been updated so that the names now match. We have also improved our practice of receiving annual reports from candidates and interns so that we are better in compliance with *BCO* requirements. As for interactions with seminary instructors are a part of the work of our Leadership Development Committee and the Presbytery as a whole does not look at these, but has entrusted the LDC with this work. It is not our practice to include minutes of committees

as part of the minutes we submit to RPR.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-05: General 2024 (*BCO* 13-5; *BCO* 46-6; *BCO* 46-7) — TEs are transferred to other PCA presbyteries with no record (in one case) of a call or other reason for the transfer, and no evidence that the action is pending the action of the other court, that a certificate of dismission was issued, or, from subsequent minutes, that the man transferred at the September meeting was received by the other presbytery.

Response [2026]: Chesapeake Presbytery agrees with this exception and will work to improve clarity with respect to transfers in the future.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted the record for review.

2025-08: Mar 12, 2024 (*BCO* 21-5; *BCO* 15; *BCO* 21-6; *BCO* 21-9) — Two installation commission reports are attached to the minutes. The first does not show attendance, the order of service, or most of the required elements of *BCO* 21-5. The other omits all the elements of the first paragraph of 21-5. Further, the second report sometimes refers to the TE as being installed as an Associate Pastor and sometimes as an Assistant Pastor.

Response [2026]: Chesapeake Presbytery agrees with this exception and will remind the installation commissions of the need to include all of the elements of *BCO* 21-5 in their record when ordaining / installing a minister and to double check to make sure the pastor being ordained / install is correctly identified as Associate, Assistant, etc...

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted the record for review.

12. That the Minutes of **Chicago Metro Presbytery:** *(46-13-1)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **Feb 19, 2025; May 21, 2025**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

2026-02: Aug 20, 2025 (*BCO* 21-4.c.(4)) — 3/4 vote for candidate to preach sermon before committee not recorded.

2026-03: Nov 19, 2025 (*BCO* 21-4.c.(4)) — 3/4 vote for candidate to preach sermon before committee not recorded.

2026-04: Nov 19, 2025 (*BCO* 20-1) — No record of call to a definite work.

2026-05: Nov 19, 2025 (*BCO* 21-4) — Presbytery failed to require explanation why the candidate's difference was merely with the recreation clause and not also with commerce prohibitions. (*WLC* 117-119). The candidate stated, “Regarding the recreation clauses found in *WCF* 21:8;

WLC 117, 119; and *WSC* 60, 61 and the fourth commandment: I do not believe that the fourth commandment forbids various forms of recreation on the sabbath. Whether playing a game of softball with your church, doing jiu jitsu with your friends, or participating in a sports league. That being said, I would discourage allowing these activities to replace a family worshipping together through prayer on the sabbath, reading God's word, and singing hymns and spiritual songs together. Neither should it replace gathering together for Sunday Lord's Day worship."

2026-06: Nov 19, 2025 (*BCO* 21-4) — Presbytery failed to require explanation why the candidate's difference was merely with the recreation clause and not also with commerce prohibitions. (*WLC* 117-119). The candidate read his stated difference: 'I have a stated difference with Westminster Confession of Faith 21.8 where it says that Christians are to rest from all "works, words, and thoughts about their worldly employments and recreation." I believe the prescribed prohibition against "recreation" on the Lord's Day extends beyond what Scripture teaches. I have three young children that I need to lead, instruct, and serve on the Sabbath, helping them to have holy rest, private and public worship, and engage in their own duties of necessity and mercy. It is conceivable to me, and it has been my experience that in loving and serving them, sometimes it is best to take a walk, play in the yard, or watch a movie (among other options). I also believe that sometimes in the outworking of wisdom and in an act of mercy toward my wife (by not asking her to suddenly cook for 10) that it is permissible to eat at a restaurant on Sunday to take advantage of spontaneous opportunities for ministry and fellowship. I believe that the Sabbath is to be kept holy and the aim of which is both rest and worship, and affirm everything else in chapter 21.'

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-11: Aug 16, 2023 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes, and these must be presented for review next year.

Response [2025]: Presbytery acknowledges the error and has included the minutes with this response. Upon review of the minutes, we noted the commission to ordain and install [Name Omitted] did have two teaching elders, but one was from another presbytery. It was not clear to the commission from The Book of Church Order that a teaching elder from another Presbytery could not property be counted in the quorum of a commission, and Presbytery did not catch the error until after the installation service. Presbytery will be sure to include minutes in our record in the future and to make sure that all commission members counted in the quorum are in this Presbytery.

Rationale [2025]: Presbytery needs to ratify the actions of the

incomplete commission.

Response [2026]: Presbytery acknowledges the error of not ratifying the actions of the incomplete commission and will do so at the present stated meeting.

2025-01: General 2024 (*BCO* 18-6) — Annual of reports of candidates not included

Response [2026]: Presbytery acknowledges the error and will be diligent to include this report in the future.

2025-02: General 2024 (*BCO* 19-12) — Annual reports of interns not recorded

Response [2026]: Presbytery acknowledges the error and will be diligent to include this report in the future.

2025-03: General 2024 (*BCO* 19-12) — Reports on every intern by the committee charged with oversight of interns at each stated meeting not included.

Response [2026]: Presbytery acknowledges the error and will be diligent to include this report in the future.

2025-04: General 2024 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

Response [2026]: Presbytery acknowledges the error and will be diligent to include this report in the future.

2025-05: General 2024 (*RAO* 16-10.a) — No record in minutes of exceptions taken by GA.

Response [2026]: Presbytery acted on the exceptions to the 2023 minutes at the February 19, 2025 stated meeting. We will be diligent to complete these in a more timely fashion in the future.

2025-06: General 2024 (*BCO* 13-9.b; *BCO* 40-1) — No record of review of records of church sessions.

Response [2026]: Presbytery recorded its review of records of church sessions for 2023 minutes at the February 19, 2025 stated meeting. We will be diligent to complete these in a more timely fashion in future.

2025-07: Feb 21, 2024 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

Response [2026]: The commission delayed in submitting its minutes. Presbytery will be diligent in future to follow up with installation commissions to insure timely receipt of these minutes. The minutes are included in the report below.,

2025-08: Feb 21, 2024 (*BCO* 21-4.c.4; *RAO* 16-3.e.5) — No/incomplete record of ordination exam.

Response [2026]: Presbytery acknowledges the error. The candidate preached a sermon to the committee from Psalm 23, but this was not recorded in the minutes.

2025-09: Feb 21, 2024 (*BCO* 46-6; *BCO* 13-7) — No record regarding the reception of a certificate of dismission from transferring presbytery.

Response [2026]: Presbytery has not historically included this information but will include in future. According to the Presbytery Portal, the transfer was completed on September 10, 2024.

2025-10: Feb 21, 2024 (*BCO* 15-2) — 8.1.2.3 Motion approved to empower the Moderator to fill remaining [Committee of Commissioners] appointments. Committee of Commissioners must be elected by the Presbytery.

Response [2026]: This reflects Presbytery's historic practice, for which we have never been cited. Presbytery will henceforth empower its Administrative Committee as a commission of the Presbytery to fill vacant Committee of Commissioner appointments.

2025-11: May 25, 2024 (*BCO* 46-6; *BCO* 13-7) — No record regarding the reception of a certificate of dismission from transferring presbytery.

Response [2026]: Presbytery has not historically included this information but will include it in future. According to the Presbytery Portal, the transfer was completed on May 20, 2024.

2025-13: May 25, 2024 (*BCO* 19-16) — 3/4 vote for waiving internship requirement not recorded.

Response [2026]: Presbytery acknowledges the error and will be diligent to include this information in future. To our best recall the vote was unanimous.

2025-14: Aug 21, 2024 (*BCO* 21-4.c.1.h; *RAO* 16-3.e.5) — No/Incomplete record of ordination exam.

Response [2026]: Presbytery acknowledges the error. The candidate was examined in the principles and rules of the government and discipline of the church but it was not recorded in the minutes.

2025-15: Aug 21, 2024 (*BCO* 24-4.c.1.h; *RAO* 16-3.e.5) — No/incomplete record of ordination exam.

Response [2026]: Presbytery Acknowledges the error. The candidates were examined in the principles and rules of the government and discipline of the church but it was not recorded in the minutes.

2025-16: Aug 21, 2024 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes

Response [2026]: Presbytery acknowledges the error. The minutes had been received but were not included in the minutes. They are provided in the form below.

2025-17: Nov 20, 2024 (*BCO* 24-4.c.1.h; *RAO* 16-3.e) — No/incomplete record of ordination exam.

Response [2026]: Presbytery acknowledges the error. The candidate was examined in the principles and rules of the government and discipline of the church but it was not recorded in the minutes.

e. **That the following responses to the 53rd GA be found unsatisfactory,**

therefore new responses shall be submitted to the following GA:

2025-12: May 25, 2024 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

Response [2026]: Presbytery acknowledges the error and will be diligent to include these reports in future. The minutes were submitted but are unfortunately not currently accessible due to Google Drive access restrictions. The installation occurred on July 14, 2024. The commission was composed of TE [Name Omitted] (chairman), TE [Name Omitted], RE [Name Omitted], RE [Name Omitted], and RE [Name Omitted].

Rationale [2026]: No record that Presbytery corrected its action or record (*RAO* 16-10.b.1). Commission must attempt to reproduce and submit missing minutes.

f. Standing Judicial Commission (SJC) Compliance:

Chicago Metro Presbytery has not met following the receipt of the SJC ruling. The review will be deferred to next year's Committee of Review of Presbytery Records (*BCO* 40-2.4; *OMSJC* 17.1.e-f).

2023-05 — Hylands v. Chicago Metro

13. That the Minutes of **Covenant Presbytery:** *(60-2-0)*

a. Be approved without exception: **Jan 14, 2025; May 20, 2025; Oct 7, 2025; Jan 14, 2025 (ES)**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

2026-02: General 2025 (*BCO* 8-8; *RAO* 16-6.c.1 and 2) — Annual report(s) of TE(s) laboring as chaplains not included.

2026-03: General 2025 (*BCO* 8-8; *RAO* 16-6.c.1 and 2) — Annual report(s) of TE(s) without call not included.

2026-04: General 2025 (*BCO* 18-6; *RAO* 16-6.c.1 and 2) — Annual report(s) of Candidates not included.

2026-05: General 2025 (*BCO* 18-6; *RAO* 16-6.c.1 and 2) — Annual report(s) Candidates still in school (instructor's) not included.

2026-06: General 2025 (*BCO* 19-12; *RAO* 16-6.c.1 and 2) — Annual report(s) of Interns not included.

2026-07: Feb 4, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-08: Feb 4, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-02: May 16, 2023 (*BCO* 43-8) — A complaint may not be dismissed, and the Presbytery "shall hear the complaint," unless there is evidence that the complainant currently does not have standing or has withdrawn or abandoned his complaint.

Response [2025]: Covenant Presbytery respectfully disagrees that it erred in this citation. RPR notes "A complaint may not be dismissed, and the Presbytery "shall hear the complaint," unless there is evidence that the complainant currently does not have standing or has withdrawn or abandoned his complaint." The citation references Covenant Presbytery minutes 158-11.2. Covenant Presbytery minutes 158-11.2 explicitly state that the Complainant "no longer has standing to prosecute this Complaint" and notes that the Complainant and family had joined another church outside of the PCA. RPR may take issue with the language of "dismissed", but that would be notation of form not substance.

Rationale [2025]: No record that Presbytery corrected its actions (*RAO* 16-10.b.1). The complainant was still a member of the PCA with standing to prosecute a complaint when the complaint was dismissed without a hearing, and Presbytery has not rescinded the unconstitutional denial of the complaint. Once the unconstitutional action is rescinded, acknowledgement of judicial mootness would be appropriate.

Response [2026]: At its February 10, 2026, meeting, Covenant Presbytery took the action pursuant to RPR's recommendation and action of the General Assembly in approving the RPR report. At the 166th Stated Meeting of Covenant Presbytery a motion was made, seconded and passed to rescind its previous action 158-11.2 and a notation be made of this action following the section 158-11.2 in the minutes. A motion was then made, seconded and passed to render the matter moot as the complainant no longer has standing having joined a non-PCA church and the church against which the complaint was filed is no longer in the bounds of Covenant Presbytery and that a notation be made of this action following section 158-11.2 of the minutes of the 158th Stated Meeting. Covenant Presbytery also made a motion, seconded and passed to correct the numbering of the actions in the minutes of the 158th Stated Meeting which wrongly enumerated actions under section 158-12 (the Administration Committee Report) as a duplicate enumeration of 158-11.1 and 158-11.2." - This action is noted in the minutes as 166-11.6.

For Information - 166-11.3 The recommendation was unanimously approved that Presbytery rescind its previous action 158-11.2 ("dismissal of a complaint finding the Complainant no longer had standing") and a notation be made of this action following the section 158-11.2 in the minutes.

166-11.4 The recommendation was approved that Presbytery render the matter moot as the complainant no longer has

standing having joined a non-PCA church and the church against which the complaint was filed is no longer in the bounds of Covenant Presbytery and that a notation be made of this action following section 158-11.2 of the minutes of the 158th Stated Meeting.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2024-01: Feb 7, 2023 (*BCO* 38-3) — No record that upon an attempt of a PCA TE to transfer to the PC(USA) that Presbytery judged whether or not the PC(USA) is failing to maintain the Word and Sacraments in their fundamental integrity.

Response [2025]: Covenant Presbytery respectfully disagrees that it erred in this citation. *BCO* 38-3.a and *BCO* 38.3.b are taken in concert with one another. *BCO* 38.3.a says, in part,"if at the time of the attempt to withdraw he is in good standing, the irregularity shall be recorded, and his new membership acknowledged." *BCO* 38.3.b says in part, "when a member or minister of the Presbyterian Church in America shall attempt to withdraw from the communion of this branch of the visible Church by affiliating with a body judged by the court of original jurisdiction as failing to maintain the Word and Sacraments in their fundamental integrity…". The acknowledgement of the irregularity (noted in the minutes as "dismissed to" [note not "transferred"]" and his new membership recorded in the minutes fulfills the requirement of *BCO* 38-3.a. Committee members may disagree with the conclusion of a presbytery on a certain matter, but that is not a reason for a citation of substance.

Rationale [2025]: A determination must be made whether the new ecclesiastical body is a branch of the visible church, permitting irregular removal (*BCO* 38-3.a.), or whether the new ecclesiastical body is a body failing to maintain the Word and Sacraments in their fundamental integrity in order to warn the TE of the danger of such attempted affiliation (*BCO* 38-3.b.).

Response [2026]: Having heard the explanation from the Chairman of RPR on the floor of the General Assembly that the minutes didn't specify whether the Teaching Elder seeking to withdraw was dismissed by Covenant Presbytery under *BCO* 38.3.a or 38.3.b, Covenant Presbytery acknowledges the minutes did not cite a specific *BCO* reference. The Teaching Elder in question had been given permission to labor outside the bounds of Covenant Presbytery as an interim pastor of a PCUSA church in October of 2020. In accordance with *BCO* 8-7 Covenant Presbytery had received "assurance that the Teaching Elder had the full freedom to maintain and teach the doctrine of our

Church". Having accepted a call to that congregation as pastor and having been received by the PCUSA, in accordance with our Standing Rules, as noted in the minutes of February 7, 2023, the Church Care Committee had taken up the power of a commission and acknowledged the new membership pursuant to *BCO* 38-3.a. The minutes of February 7, 2023, failed to record the irregularity in accordance with *BCO* 38-3.a. In the future Covenant Presbytery will strive to do better in delineating under which *BCO* provision a teaching elder is dismissed from our care and ensure that the body to which a minister seeks to join maintains Word and Sacraments in their fundamental integrity (*BCO* 2-2) and if this answer is determined to be satisfactory, a notation will be made in the February 7, 2023 minutes, 157-14.4 [Note – These minutes failed to properly record that Covenant Presbytery's Commission after consideration removed the Teaching Elder from the rolls of Covenant Presbytery under *BCO* 38-3.a].

Rationale [2026]: Presbytery has not corrected its record by recording the irregularity and has not submitted the minutes of the committee acting as a commission.

14. That the Minutes of **Eastern Canada Presbytery:** *(47-16-0)*

a. Be approved without exception: **Oct 24, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Feb 28, 2025 (*BCO* 13-6, 21-4; *RAO* 16-3.e.5) — Incomplete record of a transfer exam from another denomination.

2026-02: Feb 28, 2025 (*BCO* 40-2.2; *BCO* 40-3) — Presbytery failed to judge a Session's action as irregular and out of accord with the Constitution. Session has persons absent from the worship service due to service in coincident Sunday School return to receive the Lord's Supper. Such persons are absent from the preaching of the Word.

2026-03: Jun 6, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-04: Jun 6, 2025 (*BCO* 21-4.g.) — Presbytery did not require the candidate to state the specific instances in which he may differ with the Confession of Faith and Catechisms in any of their statements and/or propositions. Candidate's view differs with SC 60, 61 and LC 117, 119, in addition to *WCF* 21.8 as he stated.

2026-05: Jun 6, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

d. **That the following responses to the 53rd GA be found satisfactory:**

2023-03: Jun 3, 2022 (*BCO* 18) — Potential candidate not a member of PCA church; presbytery voted to "waive" requirement, but *BCO* 18 makes no such provision for waiving this requirement.

Response [2024]: We agree with the exception. Our intention was to invoke the extraordinary circumstance permitted in *BCO* 18-2: an applicant for care shall be a member of the congregation for at least six months ... "except in those cases deemed extraordinary by the Presbytery." The Presbytery judged this to be an extraordinary case for the following reasons: 1) Mr. [Name Omitted] is pastoring his own church full time, making it difficult to attend or become a member of a PCA church, 2) Mr. [Name Omitted] had been undergoing supervision and training by the pastors of [Church Name Omitted], and 3) Mr. [Name Omitted] desires to bring his church into the PCA. We will correct the minutes as follows: "MSC to waive the 6 month membership requirement by invoking the extraordinary clause of *BCO* 18-2 for the following reasons: 1) Mr. [Name Omitted] is pastoring his own church full time, making it difficult to attend or become a member of a PCA church, 2) Mr. [Name Omitted] had been undergoing supervision and training by the pastors of [Church Name Omitted], and 3) Mr. [Name Omitted] desires to bring his church into the PCA."

Rationale [2024]: The situation presented still does not resolve the issue that there is no provision in *BCO* 18 for approving a candidate that is not a member of the PCA (i.e., "the Church" in *BCO* 18-1). The "extraordinary clause" is not applicable to cases of membership in the Church in full communion.

Response [2025]: Presbytery agrees with the exception and resolves to correct its action by removing Mr. [Name Omitted] from the roll of candidates under care because Mr. [Name Omitted] is not a member of any church in the PCA.

Rationale [2025]: No record that Presbytery corrected its action or record (*RAO* 16-10.b.1) Presbytery has not recorded removal of candidate from the roll of candidates.

Response [2026]: Presbytery agrees with the exception. Presbytery confirms that the Stated Clerk has removed the candidate from the roll of candidates.

Presbytery has corrected its record by a motion to Amend Something Previously Adopted and has made a marginal notation in the minutes of June 3, 2022. Presbytery promises to be more careful in the future.

2023-04: Jun 3, 2022 (*BCO* 8-7; 20-1) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church; presbytery approved a call not from a church, Presbytery, or General Assembly without making "a record of the reasons why it considers the work to be a valid Christian ministry.

Response [2024]: We agree with the exception. The Presbytery judged

that a professorship of ministry at [University Name Omitted] is a valid call to gospel ministry, considering that he will be equipping and teaching students for ministry in the church. We will correct the minutes as follows: "MSC that the Presbytery accept the terms of call for TE [Name Omitted] to serve as Assistant Professor of Ministry at [University Name Omitted] because a professorship of ministry at [University Name Omitted] is a valid call to gospel ministry, considering that he will be equipping and teaching students for ministry in the church (*BCO* 8-7, 20-1)."

Rationale [2024]: Presbytery's response fulfills the requirements of *BCO* 20-1, as Presbytery judged this to be a valid call. However, Presbytery's response fails to fulfill the requirements of *BCO* 8-7, as the response does not indicate that it received assurance that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church.

Response [2025]: Presbytery agrees with the exception and resolves to correct its action by obtaining a letter from [University Name Omitted] stating that TE [Name Omitted] will have full freedom to maintain and teach the doctrine of our Church (*BCO* 8-7).

Rationale [2025]: No record that Presbytery corrected its action or record (*RAO* 16-10.b.1). Presbytery has not recorded receipt of the letter assuring full freedom.

Response [2026]: Presbytery agrees with the exception. On March 3, 2025, the Stated Clerk received a letter from [University Name Omitted] indicating that the out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church. The letter was presented to Presbytery at its stated meeting on June 6, 2025.

Presbytery has corrected its record by a motion to Amend Something Previously Adopted and has made a marginal notation in the minutes of June 3, 2022. Presbytery promises to be more careful in the future.

2024-01: Feb 24, 2023 (*BCO* 18-2) — No record of endorsement by candidate's Session.

Response [2025]: Presbytery agrees with the exception and resolves to correct its action by obtaining a letter of endorsement from the Session overseeing Mr. [Name Omitted].

Rationale [2025]: No record that Presbytery corrected its action or record (*RAO* 16-10.b.1). Presbytery has not recorded receipt of letter of endorsement from Session.

Response [2026]: Presbytery agrees with the exception. On February 24, 2025, the Stated Clerk received a letter of endorsement from the candidate's Session. The letter was presented to Presbytery at its stated meeting on June 6, 2025.

Presbytery has corrected its record by a motion to Amend Something Previously Adopted and has made a marginal notation in the minutes of February 24, 2023. Presbytery promises to be more careful in the future.

2024-02: Feb 24, 2023 (*BCO* 15-1) — No record of quorum for meeting of a commission.

Response [2025]: Presbytery agrees with the exception and resolves to correct its action by empowering and directing the C&C Committee to meet as a commission again, with quorum, in order to examine Rev. [Name Omitted] for transfer.

Rationale [2025]: No record that Presbytery corrected its action or record (*RAO* 16-10.b.1). Presbytery has not recorded action of either Presbytery or a commission (with quorum), examined or ratified transfer examination of TE.

Response [2026]: Presbytery agrees with the exception. On March 17, 2025, the commission submitted minutes of their meeting on the same date. They met with quorum in order to examine the TE for transfer into our Presbytery. Presbytery approved the minutes at its stated meeting on June 6, 2025.

Presbytery has corrected its record by a motion to Amend Something Previously Adopted and has made a marginal notation in the minutes of February 24, 2023. Presbytery promises to be more careful in the future.

2024-04: Feb 24, 2023 (*BCO* 18-2) — Extraordinary clause "invoked" to waive six-month membership of a candidate without a vote by presbytery.

Response [2025]: Presbytery agrees with the exception: at the time Mr. [Name Omitted] came under care, he was not a member of any PCA church. Since that date, he has become a member of [Church Name Omitted] (PCA). Presbytery will obtain a letter of recommendation from Mr. [Name Omitted]'s Session (per exception 2024-1) and commits to be more careful in future.

Rationale [2025]: No record that Presbytery corrected its action or record (*RAO* 16-10.b.1).

Response [2026]: Presbytery agrees with the exception. On February 24, 2025, the Stated Clerk received a letter of endorsement from the candidate's Session. The letter was presented to Presbytery at its stated meeting on June 6, 2025.

Presbytery has corrected its record by a motion to Amend Something Previously Adopted and has made a marginal notation in the minutes of February 24, 2023. Presbytery promises to be more careful in the future.

2024-06: Jun 2, 2023 (*BCO* 21-4.c) — Extraordinary clause "invoked" to waive theological and exegetical papers without a vote by presbytery.

Response [2025]: Presbytery respectfully disagrees with the exception.

The checklist for reception of a minister from another denomination (041-A) does not reference theological or exegetical papers. Therefore, we believe these papers are not required based on the PCA Administrative Committee guidelines and our precedent of receiving ordained ministers from other denominations.

Rationale [2025]: *BCO* 13-6; reception of ordained ministers from other denominations requires all the trials for ordination requirements of *BCO* 21-4.c(2), and (3), except in the limited use of the extraordinary clause (*BCO* 21-4.i.), by 3/4 majority vote of Presbytery. Presbytery has not recorded appropriate supermajority action of Presbytery vote to waive the theological and exegetical papers.

Response [2026]: Presbytery agrees with the exception.

Presbytery has corrected its record by a motion to Amend Something Previously Adopted and has made a marginal notation in the minutes of June 2, 2023. Presbytery corrected its action on October 24, 2025, by passing a motion with the required 3/4 majority. The text of the motion read as follows: "MSC that the candidate for transfer on June 2, 2023, not be required to submit theological and exegetical papers." Presbytery promises to be more careful in the future.

2025-01: General 2024 (*BCO* 8-7) — No record of annual report of TE laboring out of bounds.

Response [2026]: Presbytery agrees with the exception. We have six out-of-bounds TEs on our roll. In 2024, we did not receive an annual report from one TE laboring out of bounds.

Presbytery has corrected its record by a motion to Amend Something Previously Adopted and has made a marginal notation in the minutes of October 25-26, 2024 (the last meeting of 2024). Presbytery promises to be more careful in the future.

2025-02: General 2024 (*BCO* 13-2) — No record of annual report of TEs without calls.

Response [2026]: Presbytery agrees with the exception. In 2024, we had two TEs without call. We received an annual report from one on October 25-26, 2024. We failed to receive an annual report from the other.

Presbytery has corrected its record by a motion to Amend Something Previously Adopted and has made a marginal notation in the minutes of October 25-26, 2024 (the last meeting of 2024). Presbytery promises to be more careful in the future.

2025-03: Feb 23, 2024 (*BCO* 23-1) — No record of 4/5 congregational vote for associate pastor to succeed former senior pastor.

Response [2026]: Presbytery agrees with the exception. On October 27-28, 2023, Presbytery received record of a congregational

vote for the associate pastor to succeed the former senior pastor. However, we did not re-state this fact in our minutes on February 23, 2024.

Presbytery has corrected its record by a motion to Amend Something Previously Adopted and has made a marginal notation in the minutes of February 23, 2024. Presbytery promises to be more careful in the future.

2025-04: May 31, 2024 (*BCO* 13-11; *RAO* 16-3.e.7.) — Minutes of executive session not included.

Response [2026]: Presbytery agrees with the exception. The minutes of May 31, 2024, refer to "Executive Appendix 1" and "Executive Appendix 2." In advance of the meeting, the Stated Clerk prepared an executive session report packet, believing that Presbytery would go to executive session. As it happened, Presbytery chose to remain in regular session. As a result, there are no executive session minutes for May 31, 2024.

Presbytery has corrected its record by a motion to Amend Something Previously Adopted and has made a marginal notation in the minutes of May 31, 2024. Presbytery promises to be more careful in the future.

15. That the Minutes of **Eastern Carolina Presbytery:** *(63-0-0)*

a. Be approved without exception: **Aug 2, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Jan 25, 2025 (*BCO* 18-2) — No record of internship for ordination.

2026-02: Jan 25, 2025 (*BCO* 8-7) — No record that the Presbytery is assured that out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church.

2026-03: May 3, 2025 (*BCO* 21-4.c.2; *RAO* 16-3.e.5) — Incomplete record of ordination exam (theological paper).

2026-04: Jul 19, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Presbytery did not submit minutes of a Commission.

2026-05: Jul 19, 2025 (*BCO* 18-2) — No record of six months membership.

2026-06: Oct 18, 2025 (*BCO* 18-2) — No record of six months membership.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Jan 27, 2024 (*BCO* 21-4) — No record statement of differences with our Standards. No record of asking if views have changed since licensure.

Response [2026]: The candidate was examined for licensure in April, 2023, which examination was conducted at the ordination level. The candidates stated differences and their disposition were acted up and recorded in those minutes. The Presbytery did not deem it necessary to re-query the candidate in that regard in light of ordination vow #2, which places the burden on the

ordinand to inform the Presbytery of changes in his views. Nevertheless, the Presbytery has contacted the man and he has affirmed that there were no changes in his differences in the intervening 9 months.

2025-03: Jan 27, 2024 (*BCO* 13- 11; *RAO* 16-3.e.7) — Minutes of executive session not included.

Response [2026]: The Presbytery acknowleges that it failed to include those minutes in the record for review. An electronic copy is being provided with this response, two hard copies are being sent to Atlanta for inclusion in the hard-copy minutes, and the Presbytery's electronic and hard-copy 2024 Minutes have been updated to include them.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-02: Jan 27, 2024 (*BCO* 21-4.e; 21-4.c(1)(b); *RAO* 16-3.e.5) — Incomplete record of ordination exam (experiential religion [including 21-4.e], Greek and Hebrew)

Response [2026]: The candidate was examined for licensure in April, 2023, which examination was conducted at the ordination level. The examination in experiential religion was conducted and approved as part of that examination and was not repeated. That examination predated the approval of the *BCO* 21-4.e change. Nevertheless, the Presbytery has contacted the man and he has affirmed that he has never been under formal discipline and that, as far as he knows his own heart, he is in accord with *BCO* 21-4.e. Additionally, Presbytery's Examinations Committee performs a criminal background check (which was clear).

Rationale [2026]: Incomplete record of ordination exam (Greek and Hebrew).

16. That the Minutes of **Eastern Pennsylvania Presbytery:** *(64-0-0)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Feb 8, 2025 (*BCO* 19-16.a) — No record of Presbytery's internship committee's report that candidates have met the constitutional requirements for equivalent experience in lieu of a Presbytery internship.

2026-02: Feb 8, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery in the case of dissolving a TE’s call.

2026-03: Feb 8, 2025 (*BCO* 19-16) — Presbytery granted a partial equivalency of an internship, rather than the required full equivalency of 19-16.

2026-04: Apr 8, 2025 (*BCO* 13-2) — Presbytery approved a TE laboring out of bounds at a definite work as “minister without call,” rather than “labor[ing] outside the geographical bounds of his Presbytery” (*BCO*

13-2). There is additionally no record that Presbytery has received notice of concurrence or agreement of the Presbytery within whose bounds the TE is laboring.

2026-05: Sep 20, 2025 (*BCO* 23-1) — No record that Session was cited to appear before Presbytery in the case of dissolving a TE's call.

2026-06: Nov 15, 2025 (*BCO* 13-6; *RAO* 16-3.e.5) — No record of how Presbytery disposed of an orderly motion for the approval of preaching a sermon for transfer from another denomination.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Feb 10, 2024 (*BCO* 20-1; *RAO* 16-3.e.6) — Specific arrangements of call not shown to be approved.

Response [2026]: A written copy of the call was reviewed and, as noted in the minutes, was approved by the presbytery. However, we agree that the specific arrangements of the call were not listed in the minutes of the meeting. A copy of the call will be attached to our September 20, 2025 minutes, and a notation to that effect will be added to the February 10, 2024 minutes. Care will be taken to include copies of calls in future presbytery minutes.

2025-02: Sep 21, 2024 (*BCO* 34-10) — Presbytery began the process of divesting a teaching elder, per *BCO* 34-10, while he was "engaged in the regular discharge of his official functions."

Response [2026]: We agree that the teaching elder in question was indeed continuing to minister to the people of his congregation. However, he was acting independently from the oversight and counsel of the presbytery, had announced his intent to leave the PCA along with the church, and remained in this state for a prolonged period. In hindsight we agree that beginning the process to divest was not the best way to proceed in this situation. Ultimately, the teaching elder did communicate an agreed upon timetable, divestment was averted, and he has now joined another denomination. He will be removed from the roll of the presbytery at the September 20, 2025 meeting. We will take greater care about such matters in the future.

17. That the Minutes of **Evangel Presbytery:** *(63-0-0)*

a. Be approved without exception: **Feb 11, 2025; May 13, 2025; Jul 8, 2025; Aug 12, 2025; Nov 11, 2025**

b. Be approved with exception of form: **None.**

c. Be approved with exception of substance: **None.**

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: May 14, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Stated differences not recorded in the minister's/candidate's own words.

Response [2026]: Evangel Presbytery agrees with the exception and promises to be more careful in the future. The presbytery

committee confirmed with the licentiate that his views had not changed in the relatively short time between his licensure exam (2024 Feb) and his ordination exam (2024 May) but presbytery neglected to include this in the 2024 May minutes.

Presbytery approved the following motion at it's November 2025 meeting "That the Presbytery note in the minutes that [Name Omitted]'s views did not change between his licensure at the 18oth Stated Meeting and his ordination at the 181st Stated Meeting."

18. That the Minutes of **Fellowship Presbytery:** *(63-0-0)*

a. Be approved without exception: **Jan 25, 2025; Jan 25, 2025 (ES); Apr 26, 2025; Aug 16, 2025; Sep 25, 2025; Dec 4, 2025**

b. Be approved with exception of form: **Oct 28, 2025**

c. Be approved with exception of substance: **None.**

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Sep 26, 2024 (*BCO* 23-1) — No record that congregation (/session) was cited to appear before Presbytery.

Response [2026]: Fellowship Presbytery regrets that the records for its September 26, 2024, Stated Meeting did not adequately reflect that the requirement of *BCO* 23-1 was met in the dissolving the pastoral relations of two TE members of presbytery. By rule Fellowship Presbytery authorizes its Membership Committee to "act as a Commission to dissolve pastoral relations when both parties concur in the request …" (see Manual of Fellowship Presbytery, section 4.06.j.5). As recorded in the Minutes of the September 26, 2024, Stated Meeting, the Membership Committee reported that, acting as a commission, it had approved the dissolution of the respective calls.

In the first instance, the dissolution was approved by the commission on July 2, 2024 "pending congregational approval." Subsequently, as reflected in the minutes, the commission received notice that in a congregational meeting on July 24, 2024, the congregation had approved the dissolution.

In the second instance, the commission, having already received confirmation of the congregation's approval on September 1, 2024, proceeded to dissolve the pastoral relation.

Since, in both instances, confirmations from the respective congregations were received by the commission, it was considered unnecessary for the presbytery or its commission formally to "cite the congregation(s) to appear by its representatives…."

While Fellowship Presbytery believes it was following the intent of *BCO* 23-1, it will endeavor more carefully to comply with the precise requirements of the rule.

2025-02: Oct 29, 2024 (*BCO* 38-1) — The court failed to invite one or more persons who may be an offended party to provide comment on the Confession prior to final approval of the Confession by the confessor and the court.

Response [2026]: Fellowship Presbytery regrets that it failed to record that it had met the requirement of *BCO* 38-1 to invite an offended party [or parties] to provide comment on the Confession prior to final approval of the Confession by the confessor and the court. A TE had confessed to an adulterous affair with a member of his church. Clearly the TE's wife was an offended party, and per the requirement of 38-1, she was given opportunity to read and provide comment on the Confession prior to its final approval. There were also other offended parties involved in the confessed sins, particularly those who had been lied to in an attempt to cover up the adultery. They were offered opportunity to read and provide comment on the relevant parts of the Confession prior to the final approval. Again, presbytery regrets its failure to record these.

There was uncertainty, however, on the part of the investigating committee as to whether the other woman in the adulterous affair was to be considered a co-offender or an offended party, and that uncertainty was reported to presbytery prior to its approval of the Confession on September 26, 2024. The investigating committee had ascertained two important elements of the Confession that needed confirmation; namely, did the other party (OP) view it as a mutual relationship, AND what was the duration of the affair.

The committee recognized from the beginning that the TE was in an inherently unequal power relationship with the OP yet had learned from one of the elders caring for her that she did not see herself as having been abused or pressured in the affair but saw the relationship as mutual. The OP also declined offers to contact or meet with anyone from the investigating committee.

The committee sought and received advice from the PCA Stated Clerk's Office. The advice received was that she should be regarded as a co-offender, not as an offended party. All this was known to the committee prior to its recommendation to Presbytery handle the matter as a *BCO* 38-1 Case without Process.

Subsequent to presbytery's acceptance of the TE's confession, a complaint was registered which asserted that presbytery had failed to meet the 38-1 requirement by considering the "other party" in the adulterous affair to be a co-offender, and by not contacting her for review and comment on that portion of the

confession that pertained to her. Presbytery met on October 29, 2024, to hear the complaint. The substance of the meeting was conducted in executive session. Verbal testimony was received from members of the investigating committee and particularly from members of the church session involved that the intent of the requirements of 38-1 had indeed been met in a timely fashion through their ministry, and that shepherding care for the other offended party was ongoing.

In the end, the majority being satisfied that the requirement of 38-1 had been met, and that proper care for the other party was continuing through her church session, presbytery denied the complaint (see Minutes of 17th Called Meeting, October 29, 2024, and Minutes of 17th Called Meeting, October 29, 2024_Executive Session).

Subsequent to the resolution of the Complaint, in an effort to "do what is right in the eyes of everyone", two of the investigative committee members followed up by meeting with the OP and her new pastor and his wife of the church she had been attending. She confirmed her continued perception of mutuality in the adulterous relationship and the duration of the affair and declined to read any part of the Confession. She is receiving ongoing pastoral care.

Again, Fellowship Presbytery regrets that our minutes did not adequately reflect that the requirements of *BCO* 38-1 regarding the treatment of offended parties had been met, and reports that it has amended its Executive Session Minutes of 10/29/2024 to insert at line 15 on page 1 the following summary of testimony received during the meeting:

Verbal testimony was received from members of the investigating committee and particularly from members of the church session involved that the intent of the requirements of 38-1 had indeed been met in a timely fashion through their ministry, and that shepherding care for the other offended party was ongoing.

19. That the Minutes of **Georgia Foothills Presbytery:** *(64-0-0)*

a. Be approved without exception: **Jan 25, 2025; Apr 15, 2025; Sep 16, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Dec 12, 2025 (*BCO* 13-12) — No record of 10-day notice for called meeting.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Apr 16, 2024 (*BCO* 8-4; *BCO* 8-7) — No record that the Presbytery found out-of-bounds works to be needful, nor that it is assured that out-of-bounds TEs [Name Omitted] will have full freedom to maintain and

teach the doctrine of our Church.

Response [2026]: At our 2025 Fall Stated Meeting, it was affirmed that the works of TEs [Names Omitted] are needful and that they have the full freedom to maintain and teach the doctrine of our Church. The Stated Clerk will endeavor to make sure that an out-of-bound work is deemed needful by Presbytery will that call is received and that the call stipulates that a TE called to that work will have full freedom to maintain and teach the doctrine of our Church.

2025-02: Apr 16, 2024 (*BCO* 20-1; *BCO* 22-3) — Presbytery appointed TE [Name Omitted] to assistant pastor without record of receiving a call.

Response [2026]: The Stated Clerk affirms that the 2024 Spring Stated Meeting Minutes record that the call of [Name Omitted] as Assistant Pastor at [Church Name Omitted] was reviewed and approved by the Shepherding Committee acting as a Commission per our bylaws.

20. That the Minutes of **Grace Presbytery:** *(52-9-0)*

a. Be approved without exception: **Mar 25, 2025**

b. Be approved with exception of form: **May 13, 2025; Sep 9, 2025**

c. **Be approved with exception of substance:**

2026-01: Jan 23, 2025 (*BCO* 13-6) — Incomplete record of examination of TE transferring into Presbytery (Christian Experience).

2026-02: Jan 23, 2025 (*BCO* 19-2; *RAO* 16-3.e.5) — All specific requirements for licensure not recorded.

2026-03: Jan 23, 2025 (*BCO* 18-3) — No record of *BCO* 18-3 questions put to the candidate.

2026-04: Jan 23, 2025 (*WCF* 29.1, *WLC* 177; *RAO* 16-3.e.7) — Presbytery granted a doctrinal exception that appears to be out of accord with the fundamentals of our doctrinal standards by approving a man who holds to paedocommunion. The man's stated difference is as follows: "I also disagree with the WCOF's teaching regarding children and the Lord's Supper. Let me give some background to my position.

I came to Seminary at RTS Jackson not having studied the subject of baptism. Early on, I befriended a trio of Reformed Baptist men and was immediately challenged to think through the Biblical grounds for baptizing infants. It took time to assess Baptist arguments such as, "the OT sacraments were not spiritual signs but physical signs," or "baptism is always associated with faith, repentance and confessing sins in the NT" and others. In this process I came to a firm conviction of the continuity of the practice of children receiving the sign of covenant inclusion in the NT as they were in the OT.

I was surprised from the beginning that Presbyterians hold to the continuity of circumcision and baptism being applied to children, but hold to the discontinuity of Passover and the Lord's supper being

applied to children. We apply baptism to children in the face of many texts that can appear to require faith for all those baptized (Mt 3.6/Mk 1.5 "confessing their sins"; Mt 3.11 "water for repentance"; Mt 28.19 /Jn 4.1 "disciples"; Mk 1.4/Lk 3.3 "baptism of repentance"; Acts 2.38 "repent, forgiveness, Holy Spirit"; Acts 2.41 "those who had received his word"; Acts 8.12 "when they believed..."; Rm 6.3-4/Col 3.12 "baptized into his death, buried with him, newness of life"; Gal 3.27 "have put on Christ"; 1 Pt 3.21 "as appeal to God for a good conscience"). We rightly see these texts as applying to adults and that the inclusion of children in baptism is established on the grounds of the continuity of the covenants and of the covenant signs: children were included in circumcision and that inclusion was never rescinded (as evidenced in household baptisms (Acts 16.15, 33: 1 Cor 1.16).

Yet we exclude children from the Lord's Supper based on only one text, 1 Corinthians 11.27-29. It is clear that this text is not addressing the issue of a child's intellectual understanding of the gospel, but rather the immorality of adult behavior at the Lord's Supper (11.17-22). Professing believers neglected and hated one another at the very meal that celebrates Christ's finished work and its rich benefits, including the oneness of love and communion bought for them by his blood (Eph 2.11-22; 4.1-16). As Paul writes, "it is not the Lord's supper that you eat" (11.20). It is this wickedness that Paul warns against. This is a particularly unsuitable text for an across-the-boards exclusion of children from the Lord's Supper. Why do we argue for continuity in baptism in the face of multiple texts that Baptist's quote while we argue for discontinuity in the face of this one text, one that has nothing to do with children? In our approach to Passover/Lord's supper, we have abandoned the hermeneutic we use in circumcision/baptism and we have fully adopted the same Baptist hermeneutic by which they exclude children from baptism.

Circumcision was a spiritual sign of heart renewal (Dt 30.6 etc), of righteousness by faith (Rm 4.11) and of union and relationship with God (Gn 17.7) that was applied to infants and so we apply the spiritual sign of baptism to infants. If weaned children actively participated in the covenant meal of Passover, a spiritual meal pointing to atonement by sacrifice and God's mighty redemption, why do we exclude children from the spiritual meal of the Lord's Supper?

I have never heard any adequate explanation from any Presbyterian for the reasoning behind the completely different exegetical approaches to the two sacraments, one consistently for continuity, the other for discontinuity.

Much more can be written, but for further review of my position, I refer to the Minority Report by Robert Rayburn in the 1988 Ad Interim Report on Paedocommunion.

My personal practice.

I think it is important for the committee to understand how I have conducted myself in regard to this disagreement. The committee should rightly be concerned for the peace and purity of the church in this regard.

I have never taught the doctrine of Paedocommunion in public in any way or form.

I have never taught it in private to any member of my church. I have never disseminated my view in public or in private. I have answered questions about children and the Lord's supper in private, but in the few times this has happened, I gave as brief an answer as possible. I've never tried to convince any member or any group of members of my view. I think it would be divisive to do so.

I have briefly discussed the doctrine with a seminary student who was a member of our church and who had come to the same doctrinal position in his own studies.

A family transferred from a church in which their 3-year old daughter had been received as a communing member (the church's pastor and Session held to a paedocommunion position, even though they were in the PCA). This little girl gave nothing like a credible profession of faith to our Session at [Church Name Omitted] in [City/Town Name Omitted] MS. We were faced with a difficulty of ecclesiology. Is the nature of the unity of our churches in the PCA such that if we did not allow this girl to be a communing member at [Church Name Omitted], we would be effectively excommunicating this girl from the PCA where she had been a communing member? Or, should we regard the former church's action as illegitimate in the face of PCA standards and that our action would be a restoration of her to her proper relationship in regard to the PCA? (Later, after our decision, I brought the matter before Covenant Presbytery to get their take on the matter, and basically the whole Presbytery shook their head and admitted that was a hard one!) The Session discussed it at length and when we voted, it was a 50/50 split vote. I had to cast the deciding vote (the only time I've ever voted in a Session meeting!). I voted that we not admit her to the Lord's Supper because I felt that this would be consistent with PCA polity. We further engaged the former church in a series of letters urging them not to continue this kind of practice because it is divisive. That is how important it has always been to me to submit to my brethren, to uphold the standards of the PCA and to promote the peace of the church.

On another occasion a large family transferred from a CREC church. Their 3-4 year old had been taking communion in their former church but I made it clear that she would not be able to take communion in our church in Fort Worth until she made a credible profession of faith. It actually helped that they knew I held to their same convictions in regard to paedocommunion, yet I had always submitted myself to PCA

practice with my own children and in all my teaching. That encouraged them to do the same and they joined our church.

I say all this to assure the committee and Grace Presbytery of my practice for 40+ years within the fellowship of the PCA. As a result, the great majority of the members of the churches I have served never knew of my differences in this regard."

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-05: Jan 10, 2023 (*BCO* 13-2; *BCO* 34-10) — Process of *BCO* 13-2 and 34-10 not followed in cases of TEs without call for three or more years.

Response [2025]: Presbytery disagrees with this exception. In order to comply with *BCO* 13-2 and 34-10, Presbytery adopted the following Standing Rule: 2.8. The Stated Clerk shall report at each Stated Meeting the names of any Teaching Elders who have three consecutive un-excused absences from Stated Meetings and any Teaching Elders who have been without call to a particular work for 3 years (BCO13-2). 2.8.1 The Stated Clerk shall recommend the action, if any, Presbytery should take. This Report was made for each of the three (3) Stated Meetings in 2023 [p. 54, 95, & 135], noting that all Teaching Elders, who are without call, regardless of whether the three (3) year period has passed, are currently filing our pulpits on a regular basis and meeting the needs of our small congregations. Of our 39 churches, 17 do not have full-time pastors. There is only 1 Teaching Elder who is past the three (3) period, and he is filling one of these pulpits almost every Lord's Day. Accordingly, no recommendation was made to proceed under *BCO* 34-10 and there were no motions from the floor to take any action.

Rationale [2025]: *BCO* 13-2 states that *BCO* 34-10 shall be followed for a TE retained on a presbytery's rolls for more than three years without call. Furthermore, *BCO* 34-10 states that the clerk shall deliver written notice to a TE without call for more than three years that Presbytery will consider his status at the next stated meeting. Neither a lack of recommendation from the clerk nor the absence of a motion from the floor constitutes compliance with *BCO* 13-2 and 34-10; Presbytery must correct its action by following *BCO* 13-2 and 34-10.

Response [2026]: [Name Omitted] has requested and was granted Honorable Retirement at the September, 2025 Stated Meeting.

21. That the Minutes of **Great Lakes Presbytery:** *(64-0-0)*
    a. Be approved without exception: **May 3, 2025; Sep 19–20, 2025**
    b. Be approved with exception of form: **None.**
    c. **Be approved with exception of substance:**

2026-01: Jan 11, 2025 (*BCO* 18-2) — Requirements for internship not met.

2026-02: Feb 20, 2025 (*BCO* 13-12; *RAO* 16-3.c.1) — Purpose of called meeting not recorded verbatim in the minutes.

2026-03: Feb 20, 2025 (*BCO* 13-12) — Notice for called meeting not in order (10-day notice).

22. That the Minutes of **Gulf Coast Presbytery:** *(63-0-0)*

a. Be approved without exception: **Oct 14, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Feb 10–11, 2025 (*BCO* 13-5) — Presbytery received a TE into membership without dismissal from previous presbytery. Presbytery should denote the TE was ordained as a Navy Chaplain prior to his reception, and that this issue belongs with another presbytery.

2026-02: May 13, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Feb 12–13, 2024 (*BCO* 21-5; *BCO* 21-6) — Installation reports of men being installed as Assistant Pastors record the questions being asked of the Congregation rather than the Session.

Response [2026]: Gulf Coast Presbytery acknowledges our error and will remind installation commissions for assistant pastors to ask questions to the Session rather than the Congregation.

Approved by GCP on February 23, 2026

2025-02: Oct 8, 2024 (*BCO* 23-1) — No record of Congregational concurrence in the dissolution of a TE's call.

Response [2026]: Gulf Coast Presbytery acknowledges our failure to properly record the Congregation's concurrence in the dissolution of a TE's call. The minutes of that Congregational meeting are attached and Presbytery's minutes were amended at the February 23, 2026 meeting to demonstrate the Congregation's concurrence.

Approved by GCP on February 23, 2026

23. That the Minutes of **Gulfstream Presbytery:** *(62-0-0)*

a. Be approved without exception: **May 13, 2025; Nov 11, 2025; Dec 02, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Feb 11, 2025 (*BCO* 21-5; *BCO* 15-1, 2; *RAO* 16-3.e.4) — No record of the installation of a newly ordained TE; No record of commission members being elected to install TE; No record that a TE signed the ministerial obligation form; Minutes of commission not entered into Presbytery minutes.

2026-02: Feb 11, 2025 (*BCO* 8-7) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach

the doctrine of our Church.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-02: General 2023 (*BCO* 13-2) — No record of reports received from TEs without call.

Response [2025]: Gulfstream has not regularly received reports from TEs without call. Moving forward, these reports will be requested and entered into the minutes.

Rationale [2025]: No record of progress

Response [2026]: As previously stated, this was an oversight and moving forward, Gulfstream Presbytery has required reports from TEs without call.

2024-03: General 2023 (*BCO* 8-4) — No record of reports from TEs in work needful to the church.

Response [2025]: Gulfstream has not regularly received reports from all TEs in work needful to the church. Moving forward, these reports will be requested and entered into the minutes.

Rationale [2025]: No record of progress

Response [2026]: As previously stated, this was an oversight and moving forward, Gulfstream Presbytery has required reports from TEs in work needful to the church.

2025-03: Nov 12, 2024 (*BCO* 18-2) — No record of candidate's required six-month membership for two men.

Response [2026]: Gulfstream presbytery is aware of the 6-month membership requirement, but never deemed it necessary to include that detail in the minutes. The November 12, 2024 minutes have been amended to reflect their membership of at least 6 months prior to coming under care, and those minutes have been submitted for your review.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2024-01: General 2023 (*BCO* 13-9.b; 40-3) — Results of review of records of church Sessions not stated. In addition, given the duty of the Presbytery to review Session records at least once a year and approve, disapprove or correct them, and given a previous exception of substance for incomplete review of records, reviews and results of reviews should address previous year(s) records.

Response [2025]: Gulfstream is on a mission to retrieve and review these minutes by the end of 2025.

Rationale [2025]: No record of progress.

Response [2026]: Gulfstream is unsure exactly how far back you'd like us to review session records. If the committee would inform us which years of session records they'd like reviewed, Gulfstream presbytery will endeavor to do so as soon as feasible.

Rationale [2026]: Presbytery has not corrected its failure to review session records and should review and approve all unreviewed

records in order to comply and resolve this matter.

2025-01: General 2024 (*BCO* 13-9.b; *BCO* 40-3) — No record of Session records reviewed for multiple years.

Response [2026]: Gulfstream is unsure exactly how far back you'd like us to review session records. If the committee would inform us which years of session records they'd like reviewed, Gulfstream presbytery will endeavor to do so as soon as feasible.

Rationale [2026]: Presbytery has not corrected its failure to review session records and should review and approve all unreviewed records in order to comply and resolve this matter.

2025-02: Apr 16, 2024 (*RAO* 16-4.a) — No minutes provided for the April 16, 2024 meeting.

Response [2026]: Gulfstream Presbytery believes the minutes for the April 16, 2024 meeting were sent, along with all the minutes for the 2024 calendar year. However, in case there was an oversight on our part, the April 16, 2024 minutes have been submitted for review.

Rationale [2026]: Presbytery needs to provide minutes for review.

24. That the Minutes of **Heartland Presbytery:** *(63-0-0)*

a. Be approved without exception: **Feb 1, 2025; Apr 25–26, 2025; Jul 10, 2025; Sep 26–27, 2025**

b. Be approved with exception of form: **None.**

c. Be approved with exception of substance: **None.**

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Sep 27–28, 2024 (*BCO* 34-10) — Improper divestiture without censure-no record of notice issued at prior meeting, and no record of 2/3 vote to divest.

Response [2026]: The Heartland Presbytery agrees with this exception. The mistake is a clerical error in that the full details were not properly recorded in the minutes. The Teaching Elder in question provided “satisfactory evidence of his inability to serve the Church with acceptance” (*BCO* 38-2) at the prior Stated Meeting in April 2024. At the next Stated Meeting in September 2024, after full deliberation the Presbytery concurred with him in judgment and proceeded to divest him of his office without censure (*BCO* 38-2). We will update our record with these details and aim to be more careful in the future.

25. That the Minutes of **Heritage Presbytery:** *(56-0-0)*

a. Be approved without exception: **May 13, 2025; Sep 13, 2025**

b. Be approved with exception of form: **Jan 25, 2025; Nov 15, 2025**

c. **Be approved with exception of substance:**

2026-01: Jun 10, 2025 (*BCO* 13-12) — No record of 10 day notice provided.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-01: Jan 28, 2023 (*BCO* 21-4.c(1)(a)) — Incomplete record of Ordination Exam, specifically examination as to "his acquaintance with experiental religion, especially his personal character and family management…"

Response [2025]: Presbytery agrees with the exception. The candidate was examined as to "his acquaintance with experiential religion, especially his personal character and family management…" The clerk used an older template in recording the minutes. This error has been corrected now that this error in recording has been made known.

Rationale [2025]: Presbytery needs to correct its minutes.

Response [2026]: Presbytery corrected its minutes on November 15, 2025.

Motion: Moved to amend the minutes of January 28, 2023, to state on pages 3 and 4 that "Mr.[Name Omitted] was examined to "his acquaintance with experiential religion, especially his personal character and family management…(*BCO* 21-4.c(1)(a))"

2024-02: May 9, 2023 (*BCO* 21-4.c(1)(a)) — Incomplete record of Ordination Exam, specifically examination as to "his acquaintance with experiental religion, especially his personal character and family management…"

Response [2025]: Presbytery agrees with the exception. The candidate was examined as to"his acquaintance with experiential religion, especially his personal character and family management…" The clerk used an older template in recording the minutes. This error has been corrected now that this error in recording has been made known.

Rationale [2025]: Presbytery needs to correct its minutes.

Response [2026]: Presbytery corrected its minutes on November 15, 2025.

Motion: Moved to amend the minutes of May 9, 2023, to state on pages 2-4 that "Mr. [Name Omitted] was examined to "his acquaintance with experiential religion, especially his personal character and family management… (*BCO* 21-4.c(1)(a))"

2024-04: Nov 18, 2023 (*BCO* 18-2) — No record of six month membership for candidate or Session endorsement.

Response [2025]: This candidate was previously under care in the Metro West presbytery and was accepted as a transfer into the same standing into the Heritage Presbytery by presbytery vote.

Rationale [2025]: Presbytery needs to correct its minutes.

Response [2026]: Presbytery corrected its minutes on November 15, 2025.

Motion: Moved to amend the minutes of November 18, 2023,

to state on page 4 that "Mr. [Name Omitted] previously being under care of Metro West be received into Heritage Presbytery under that same status as a case “deemed extraordinary” (18-2) since he was previously under care of another presbytery.”

2025-01: Jan 27, 2024 (*BCO* 21-4.b) — Member of Presbytery denied the right to request to examine a candidate for ordination on particular points from previous licensure examinations.

Response [2026]: Presbytery agrees with the exception. Presbytery should have allowed the candidate to be examined on particular points from previous licensure examinations. Presbytery changed its policy at its May 14, 2024 meeting to ensure the right to question men previously licensed is preserved.

2025-02: May 14, 2024 (*BCO* 21-2; *BCO* 20-1, 21-4) — More information needed to review incomplete ordination exam.

Response [2026]: Presbytery agrees with the exception. Presbytery should have allowed the candidate to be examined on particular points from previous licensure examinations. Presbytery changed its policy at its May 14, 2024 meeting to ensure the right to question men previously licensed is preserved.

26. That the Minutes of **Highlands Presbytery:** *(62-0-2)*

a. Be approved without exception: **Nov 12, 2024; Aug 2, 2025 (ES); Nov 11, 2025 (ES)**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 13-9.b; *BCO* 40-1) — No record of review of records of church Sessions.

2026-02: Feb 22, 2025 (*BCO* 18-2) — No record of endorsement by candidate’s Session and six months membership for candidate.

2026-03: May 6, 2025 (*BCO* 18-2) — No record of endorsement by candidate’s Session and six months membership for candidate.

2026-04: Aug 2, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

2026-05: Oct 9, 2025 (*BCO* 12-3) — No record of Session’s consent to appointed moderator.

2026-06: Nov 11, 2025 (*BCO* 18-2) — No record of endorsement by candidate’s Session and six months membership for candidate.

d. **Standing Judicial Commission (SJC) Compliance:**

Highlands Presbytery has not met following the receipt of the SJC ruling. The review will be deferred to next year's Committee of Review of Presbytery Records (*BCO* 40-2.4; *OMSJC* 17.1.e-f).

2025-06 — Bulkeley v. Highlands

27. That the Minutes of **Hills and Plains Presbytery:** *(63-0-0)*

a. Be approved without exception: **Feb 8, 2025; May 17, 2025; Oct 14, 2025**

(ES); Feb 10, 2024 (ES); Jun 10, 2025; Aug 26, 2025

b. Be approved with exception of form: **May 6, 2025; Oct 14, 2025**

c. Be approved with exception of substance: **None.**

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-02: Feb 11, 2023 (*BCO* 13-2) — No action of Presbytery to receive ordinand candidate into membership.

Response [2025]: His ordination exams having been sustained, his internship approved, and his call to a definite work at [Church Name Omitted] approved, RE [Name Omitted] was received into the membership of Hills and Plains Presbytery.

Rationale [2025]: No record that Presbytery corrected its record

Response [2026]: Presbytery agrees and apologizes. Presbytery has corrected its record by a motion to Amend Something Previously Adopted and has made a marginal notation in the original minutes referring to this response. Presbytery promises to be more careful in the future.

2025-02: May 7, 2024 (*BCO* 38-3.b) — It does not appear that TE removed from the rolls was "warned of his danger" prior to removal from the rolls.

Response [2026]: We, Hills and Plains Presbytery, are sorry for the oversight of not recording the fact that [Name Omitted] had been warned as required by *BCO* 38–3–B. We understand the importance of this matter and will make every effort not to repeat the oversight in the future.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-01: Feb 10, 2024 (*BCO* 13-11; *RAO* 16-3.e.7) — Minutes of executive session not included.

Response [2026]: Presbytery agrees and apologizes. This was an oversight by the clerk when compiling minutes to submit for review. These minutes are included with 2025 minutes for review. Presbytery promises to be more careful in the future.

Rationale [2026]: Minutes of executive session not included.

28. That the Minutes of **Houston Metro Presbytery:** *(64-0-0)*

a. Be approved without exception: **Jan 17, 2025; Jul 10, 2025; Aug 15, 2025; Nov 10, 2025**

b. Be approved with exception of form: **Feb 27, 2025**

c. **Be approved with exception of substance:**

2026-01: Apr 14, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-02: Apr 14, 2025 (*BCO* 8-7) — No record that out-of-bounds TE is engaged in preaching and teaching the Word or that the Presbytery is assured that he will have full freedom to maintain and teach the doctrine of our Church.

2026-03: Apr 14, 2025 (*BCO* 20-1) — No record of the reasons why Presbytery considers an out-of-bounds work to be a valid Christian ministry.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Apr 8, 2024 (*BCO* 23-1; *BCO* 13-9) — No record of pastor having tendered his resignation, and no record of report from church on why Presbytery should dissolve the relationship.

Response [2026]: The minister resigned his call, and his resignation was accepted at a congregational meeting on March 24, 2024. Minutes from the congregational meeting have been supplied to the Clerk of Presbytery and the minutes of Presbytery have been amended to include this information. The dissolution of call was uncontested and approved by a congregational vote of 29-0-4.

2025-02: Apr 8, 2024 (*BCO* 23-1) — No record of pastor having tendered his resignation, and no record of report from church on why Presbytery should dissolve the relationship.

Response [2026]: The minister resigned his call, and his resignation was accepted at a congregational meeting on April 7, 2024. Minutes from the congregational meeting have been supplied to the Clerk of Presbytery and the minutes of Presbytery have been amended to include this information. The dissolution of call was uncontested.

The minister resigned his call, and his resignation was accepted at a stated Session meeting on February 13, 2024. A letter from the Session conveying the action has been supplied to the Clerk of Presbytery and the minutes of Presbytery have been amended to include this information. The dissolution of call was uncontested.

2025-03: Apr 8, 2024 (*BCO* 23-1) — No record that congregation (/session) was cited to appear before Presbytery

Response [2026]: In all three cases, Presbytery failed to specifically cite the church to appear by its commissioners, to show cause why the Presbytery should or should not accept the resignation (*BCO* 23-1), but RE commissioners from two churches were present at the meeting of Presbytery and assented to the dissolutions. The minutes have been amended to specifically note this. Since the requests to dissolve the relationships were uncontested by either party, the resignations were accepted and the pastoral relations dissolved. In the future, we plan to specifically request and record the testimony of the church's commissioners regarding pastoral resignations.

2025-04: Apr 8, 2024 (*BCO* 16-2) — Presbytery establishes an interim session for a church without the consent of the church.

Response [2026]: The resignation of the pastor left the church with a

single ruling elder. Per *BCO* 12-1, he does not constitute a Session. Having no permanent governing body, the church became a mission church requiring that it be governed or supervised by others (*BCO* 5-1). Per *BCO* 5-3, Presbytery exercised its discretion to provide for such a government via a *BCO* 15-1 commission to serve as a temporary Session.

The decision in *SJC* 2024-20 (Fout v. Ohio Valley) makes clear that a Presbytery is not obligated to obtain the consent of the congregation when appointing a temporary Session.

2025-05: Nov 11, 2024 (*BCO* 18-2) — No record of six months membership for candidate.

Response [2026]: The candidate was a member of his church for more than six months. The minutes have been corrected to properly record this.

2025-06: Nov 11, 2024 (*BCO* 23-1) — No record that congregation (/session) was cited to appear before Presbytery.

Response [2026]: In both cases, Presbytery failed to specifically cite the church to appear by its commissioners, to show cause why the Presbytery should or should not accept the resignation (*BCO* 23-1). In both cases, the minister resigned to enter honorable retirement, and the minutes noted that the resignations were accepted by session and congregational meetings respectively. RE commissioners from one church were present at the meeting of Presbytery and assented to the dissolution. The minutes have been amended to specifically note this. Since the requests to dissolve the relationships were uncontested by either party, the resignations were accepted and the pastoral relations dissolved. In the future, we plan to specifically request and record the testimony of the church's commissioners regarding pastoral resignations.

e. **Standing Judicial Commission (SJC) Compliance:**

Houston Metro Presbytery has not met following the receipt of the SJC ruling. The review will be deferred to next year's Committee of Review of Presbytery Records (*BCO* 40-2.4; *OMSJC* 17.1.e-f).

2024-02 — Gleason v. Houston Metro

2024-13 — Colquitt v. Houston Metro

29. That the Minutes of **Illiana Presbytery:** *(64-0-0)*

a. Be approved without exception: **Apr 12, 2025; Oct 18, 2025**

b. Be approved with exception of form: **Oct 1, 2025**

c. **Be approved with exception of substance:**

2026-01: Jan 19, 2025 (*BCO* 13-9.b; *BCO* 40-1) — No record that the presbytery approved the review of records of church Sessions.

2026-02: May 29, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery.

2026-03: Jul 1, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery.

d. **That the following responses to the 53rd GA be found satisfactory:**

2023-01: General 2022 (*BCO* 13-9.b; 40-1) — No record of review of records of church Sessions.

Response [2024]: The presbytery apologizes for not including these reviews in our minutes. These reviews were in fact conducted by the presbytery's Church Review and Report Committee in 2022. Since the presbytery did not act upon these reviews in 2022, it acted upon them on October 19th, 2024 to rectify this problem (reviews attached).

Rationale [2024]: No record that Presbytery corrected its action or record (*RAO* 16-10.b.1). Presbytery has not recorded action upon committee reviews of 2022.

Response [2026]: The presbytery apologizes for failing to adequately address this issue of substance. the presbytery amended something previously adopted from its stated meeting on April 13, 2024 by approving the reviews of church sessional records from 2022. It approved the reviews for [Church Names Omitted]. The presbytery promises to be more careful in the future.

2025-01: Jan 21, 2024 (*RAO* 14-2) — Election of commissioners requires action by presbytery or a commission of presbytery.

Response [2026]: The presbytery acknowledges this error and apologizes for it. After assessing the records, no other nominations or appointments were made outside the January 20, 2024 stated meeting of presbytery. Therefore, there were no additional elections or appointments to be ratified by the presbytery to correct its record. The presbytery promises to be more careful in the future.

2025-02: Jan 21, 2024 (*BCO* 18-2) — No record of six months membership for candidate.

Response [2026]: The presbytery apologizes for its negligence in failing to record this act. The presbytery has corrected its record by a motion to Amend Something Previously Adopted from its stated meeting on January 20, 2024 by adding a record of his six-month membership to candidate [Name Omitted]'s candidacy for gospel ministry and has made a marginal notation in the original minutes referring to this response. Candidate [Name Omitted] has been a member of [Church Name Omitted] in [Town Name Omitted] since 2008. The presbytery promises to be more careful in the future.

2025-03: Jan 21, 2024 (*BCO* 18-2) — No record of endorsement by candidate's Session.

Response [2026]: The presbytery apologizes for its failure to include a

record of endorsement by a candidate's Session in the minutes. The presbytery amended something previously adopted from its stated meeting on January 20, 2024 to include the written report from [Church Name Omitted] that endorses RE [Name Omitted] for gospel ministry. The presbytery has made a marginal notation in the original minutes referring to this response. The presbytery promises to be more careful in the future.

2025-04: Jan 21, 2024 (*BCO* 8-7) — No record that the presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our church.

Response [2026]: The presbytery apologizes for its negligence in recording this properly in the minutes. The presbytery amended something previously adopted from its stated meeting on January 20, 2024 by including a record that the Teaching Elder, along with the agreement of his church, that he has the freedom of liberty and conscience to teach the doctrines of our church in his current church ministry. The presbytery has made a marginal notation in the original minutes referring to this response. The presbytery promises to be more careful in the future.

2025-05: Jan 21, 2024 (*BCO* 20-1) — No record of the reasons why Presbytery considers the out-of-bounds work to be a valid ministry.

Response [2026]: The presbytery regrets the oversight of not reporting the reasons for approving TE [Name Omitted]'s call to serve out of bounds. The presbytery amended something previously adopted from its stated meeting on January 20, 2024 by offering the following reasons for the validity of the this ministry: it was determined that TE [Name Omitted] would be engaged in preaching and teaching the Word, that he would have full freedom to maintain and teach the doctrine of our Church, and that he would report at least annually on his work. The presbytery has made a marginal notation in the original minutes referring to this response. The presbytery promises to be more careful in the future.

2025-06: Apr 16, 2024 (*BCO* 13-9.b; *BCO* 40-1) — Incomplete record of review of records of church sessions.

Response [2026]: The presbytery apologizes for this oversight by failing to correctly handle its review of sessional records. To rectify this error, the presbytery amended something previously adopted from its stated meeting on April 13, 2024 by approving the following reviews from the Church Review and Report Committee: [Church Names Omitted]. The presbytery has made a marginal notation in the original minutes referring to this response. The presbytery promises to be more careful in the

future.

2025-07: Apr 16, 2024 (*BCO* 8-7; *BCO* 13-8) — No record of annual report of TE laboring out of bounds (or without call).

Response [2026]: The presbytery received reports from all five TEs that served out of bounds for the year of 2024. The presbytery will endeavor to record these matters in a clearer manner in the future. The presbytery received the following oral reports from men that labor out of bounds: TE [Name Omitted] on 01/20/2024; TE [Name Omitted] on 04/13/2024; TE [Name Omitted] on 04/13/2024; TE [Name Omitted] on 10/19/2024; and TE [Name Omitted] on 10/19/2024

2025-08: Apr 16, 2024 (*BCO* 13-2) — No record of TE laboring out of bounds with concurrence of Presbytery within whose bounds he labors.

Response [2026]: The presbytery acknowledges its error for failing to receive the concurrence of the neighboring presbytery and apologizes for its negligence. This Teaching Elder was transferred into the Mississippi Presbytery of the Associate Reformed Presbyterian Church at our stated meeting on October 19, 2024. Since this Teaching Elder is now outside the jurisdiction of the presbytery, no further action was taken by the presbytery. The presbytery promises to be more careful in the future.

2025-09: Jul 14, 2024 (*BCO* 23-1) — No record church was cited to appear, to either affirm or decline the dissolution of the pastoral relation.

Response [2026]: The presbytery acknowledges this error and apologizes to the assembly for failing to cite the church to appear in the dissolution of a pastoral call. The church recommended the dissolution of this call in a duly called congregational meeting and RE [Name Omitted] from [Church Name Omitted] was present at the meeting. There were no posed objections to the dissolution of this call. The presbytery promises to be more careful in the future.

A brief excerpt from the congregational meeting at [Church Name Omitted] on July 14, 2024:

"Moderator [Name Omitted] brought a motion to the floor to release the call of TE [Name Omitted] to Associate Pastor at [Church Name Omitted] effective 19 August 2024. The congregation voted on the motion by secret ballot. The motion was carried."

30. That the Minutes of **Iowa Presbytery:** *(61-0-2)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 13-9.b; *BCO* 40-3) — Results of review of

church session minutes not stated or recorded.

2026-02: General 2025 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

2026-03: General 2025 (*BCO* 13-2) — No Record of Annual Report of TE's without call

2026-04: Jan 11, 2025 (*BCO* 13-12) — Purpose of called meeting not recorded verbatim in the minutes. Agenda recorded as 'Amended'; no notation for the amendment.

2026-05: Jan 11, 2025 (*BCO* 13-11; *RAO* 16-3.e.10) — Complaint not listed or included in the minutes.

2026-06: Jan 11, 2025 (*BCO* 13-11; *BCO* 13-12) — No record that at least 10 days notice of a called meeting was given.

2026-07: Jan 11, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam: missing biblical languages, exegesis, theological thesis.

2026-08: Mar 8, 2025 (*BCO* 13-11; *RAO* 16-3.e.10) — Complaint not listed or included in the minutes.

2026-09: Mar 8, 2025 (*BCO* 21-6) — Questions were posed to the congregation as opposed to the session for an assistant pastor.

2026-10: May 3, 2025 (*BCO* 13-11) — No record that at least 10 days notice of a called meeting was given.

2026-11: Jul 12, 2025 (*BCO* 13-11) — No record of actual motion that was carried.

2026-12: Jul 12, 2025 (*BCO* 19-2; *BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-13: Jul 12, 2025 (*BCO* 13-1; *BCO* 15-1; *RAO* 16-3.e.4) — Presbytery admitted candidate to its membership with no record of ordination.

2026-14: Nov 8, 2025 (*BCO* 8-7; *BCO* 13-2; *BCO* 20-1) — Status of TE changed from without call to out-of-bounds without Presbytery approval.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 — No record of annual reports of TEs labour out of bounds

Response [2026]: The Presbytery acknowledges the exception regarding the annual reports of Teaching Elders laboring out of bounds. To rectify this, the Presbytery directed the presbytery's Candidates and Credentials Committee to conduct a retrospective review of these reports for the 2024-2025 cycle. These reports will be presented and approved at the July 2026 meeting of the Presbytery. We have implemented a new docket checklist to ensure these reports are recorded annually every November.

2025-02: Mar 9, 2024 (*BCO* 19-2; *RAO* 16-3.e.5) — All specific requirements of licensure exam not recorded.

Response [2026]: The Presbytery respectfully disagrees with this

exception. While the candidate's licensure was finalized on March 9, 2024, the specific requirements cited were satisfied and recorded during the previous stated meeting. The Minutes of the November 11, 2023 meeting of the Iowa Presbytery record the candidate's statement of Christian experience and his inward call, as well as the Presbytery's approval of his licensure sermon. When these are viewed in conjunction with the March 9, 2024 minutes, all requirements of *BCO* 19-2 and *RAO* 16-3.e.5 were fully met and documented. The Clerk will ensure that for future candidates whose exams span multiple meetings, the final record clearly references the completion of all prior requirements.

2025-03: Jul 13, 2024 (*BCO* 23-1) — Assistant Pastors calls not dissolved before being called as Associate Pastors

Response [2026]: Presbytery acknowledges the exception for the July 13, 2024, minutes (Lines 943-960). It was the intent of the Presbytery that the approval of the calls to Associate Pastor for TE [Name Omitted] and TE [Name Omitted] necessitated the conclusion of their Assistant Pastorates. We acknowledge that *BCO* 23-1 requires an explicit dissolution of the prior call. The Clerk has been directed to ensure that future transitions from Assistant to Associate status include a distinct motion to dissolve the initial call prior to the constitutional move to the new installation.

2025-04: Jul 13, 2024 (*BCO* 21-1) — No record that the Presbytery approved the call of two candidates to become Associate Pastors.

Response [2026]: The Presbytery respectfully disagrees with this exception. The record of the Presbytery's approval of these calls is found in the Minutes of the 75th Stated Meeting (July 13, 2024) on Page 4.

Under the section Candidate and Credentials, the minutes record:

• Regarding TE [Name Omitted]: "Updated Call to TE [Name Omitted] was read to the presbytery … M/S/C to find the call in order and approve the call... TE [Name Omitted] received in his hands and accepted the call as presented."

• Regarding TE [Name Omitted]: "Updated Call to TE [Name Omitted] was read to the presbyter[y] … M/S/C to find the call in order and to approve the call... TE [Name Omitted] received into his hands and accepted the call as presented." CHAR 10 Because the Presbytery explicitly found both calls in order and approved them, the requirements of *BCO* 21-1 were satisfied and recorded.

2025-05: Jul 13, 2024 (*BCO* 15-2) — No commission was appointed by the Presbytery to install Associate Pastors.

Response [2026]: The Presbytery acknowledges the omission of a formal Presbytery Commission but clarifies that it acted to regularize an existing impropriety.

As recorded in the Minutes of the 75th Stated Meeting (July 13, 2024), [Church Name Omitted], being new to the PCA, had mistakenly conducted its own installation services for TE [Name Omitted] and TE [Name Omitted] without Presbytery oversight. Upon receiving an apology from the Session for these improprieties, the Presbytery voted to "retroactively accept what has been done... in light of their apology" (Minutes, Page 4, under Candidates and Credentials section).

Regarding TE [Name Omitted]: This matter is now moot, as he has since concluded his ministry at [Church Name Omitted].

Regarding TE [Name Omitted]: By retroactively accepting the church's previous actions, the Presbytery intended to regularize TE [Name Omitted]'s status as an installed Associate Pastor without requiring a redundant service.

The Presbytery has since provided the [Church Session Name Omitted] with further instruction on *BCO* 15-2 and 21-11 to ensure all future installations are conducted by a duly appointed Presbytery Commission.

e. **Concerning reports alleging important delinquency and/or grossly unconstitutional actions:**

i) **The General Assembly** find the November 26, 2025, letter from Mr. Ron Kepford and Mrs. Caryn Kepford is not a report of an "important delinquency or grossly unconstitutional proceedings" (*BCO* 40-5).

Rationale: The report alleged that the Presbytery failed to conduct a proper *BCO* 31-2 investigation against a Teaching Elder. The Presbytery exercised its discretion under *BCO* 31-2 in determining the nature and extent of its investigation. This does not rise to the level of an important delinquency or grossly unconstitutional proceeding.

ii) **The General Assembly:**

1) Find that the 16 April, 2026 letter from Mr. and Mrs. Kepford, et al. is a credible report of "an important delinquency or grossly unconstitutional proceedings" (*BCO* 40-5): specifically, there is evidence that a session was elected to replace an existing search committee at a congregational meeting not called for such a purpose (*BCO* 20-2, 25-2); and

2) Cite the Iowa Presbytery to appear, per *BCO* 40-5, before the PCA's Standing Judicial Commission which the 53rd GA constitutes its commission to adjudicate this matter, by representative or in writing, at the SJC's fall stated meeting, to "show what the lower court has done or failed to do in the case

in question," following the *Operating Manual for the SJC*, particularly chapter 15; and

3) Direct the CRPR Officers to appoint one or more representatives of the GA and Report (*OMSJC* 15.2) to present this case to the SJC.

Rationale: The report alleged that the Presbytery failed to correct a lower court when, at a congregational meeting called only for discussion, motions were received and voted upon to dissolve the pastoral search committee and appoint the Session to function as the search committee. The rights of members to deliberate, nominate and vote must be exercised in an orderly manner, including proper notice of the purpose of a called congregational meeting (*BCO* 20-2, 25-2; PP 6; *cf.* Acts 6:1-6). If sustained by the record, the apparent violation would rise to the level of an important delinquency or grossly unconstitutional proceeding on the part of the Presbytery for failing to correct the action of the lower court.

f. **Standing Judicial Commission (SJC) Compliance:**

Iowa Presbytery recorded the full decision in their minutes and/or has provided a statement describing how the lower court has complied with any amends contained therein (*BCO* 40-2.4; *OMSJC* 17.1.e-f):

2025-03 — Sherfield v. Iowa

Members of the SJC, TE Paul Lee and TE Steve Tipton, refrained from discussion and abstained from the vote on Iowa Presbytery.

31. That the Minutes of **James River Presbytery:** *(61-0-0)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **Jan 18, 2025; Sep 2, 2025**

c. **Be approved with exception of substance:**

2026-01: Apr 12, 2025 (*RAO* 16-3.e.1) — Reasons for a chair's ruling on a point of order not given.

2026-02: Jul 17, 2025 (*RAO* 16-3.e.1) — Reasons for a chair's ruling on a point of order not given.

2026-03: Oct 11, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exams.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-01: Jan 21, 2023 (*RAO* 16-3.c.6) — No record of the names of ruling elders in attendance.

Response [2025]: As stated in response to a similar exception last year, the JRP disagrees with this exception of substance. While names of attending ruling elders were not included in the minutes, the record shows on the listed pages that churches were either considered present or absent (noted by the "P" and the "U" next to the names of each church) by the presence of

commissioned ruling elders. *BCO* 13-1 makes it clear that a Presbytery is comprised of TEs and her churches, not the specific ruling elders. We consider our record sufficient to satisfy *BCO* 13-4. The JRP has included the sign-in sheets in the 2024 minutes for the 2024 stated meetings in response to this exception.

Rationale [2025]: *RAO* 16-3.c.6 Requires that "The names of those present at the meeting" be recorded. This information is required for various purposes, including determining which ruling elders have the right of complaint, and which members have the right of access to executive session minutes.

Response [2026]: The Presbytery appreciates the clarifying citation. In light of that clarification, the Presbytery acknowledges that it did fail to record the names of the ruling elders in attendance at the January 21, 2023 meeting as required by *RAO* 16-3.c.6. The Presbytery had adjusted its practice starting with the April meeting in 2023 and has recorded the names of the ruling elders in attendance for every meeting since then.

2025-08: Apr 13, 2024 (*BCO* 20-6) — Presbytery appears to have amended a call without consent of congregation.

Response [2026]: The Presbytery disagrees with this citation. It is noted in the report of the Mission Committee that the change in call was pending the dismissal of the teaching elder by the congregation at a later date. Due to the timing of the call beginning, it was preemptively approved by the Presbytery, but that was entirely dependent on the congregation releasing the TE. They subsequently did release the TE and he took up his new call as a church planter.

2025-10: Jul 18, 2024 (*BCO* 13-11; *RAO* 16- 3.e.1) — Reasons for a chair's ruling on a point of order not given. The substance point of order itself is also not recorded.

Response [2026]: The Presbytery acknowledges and agrees with the stated exception that it failed to record both the substance of the point of order and the rationale for the chair's ruling. The Presbytery will ensure that both are recorded in the case of a point of order in the future.

2025-12: Oct 12, 2024 (*BCO* 13-11; *RAO* 16- 3.e.1) — Reasons for a chair's ruling on a point of order not given. The point of order is also not recorded.

Response [2026]: The Presbytery acknowledges and agrees with the stated exception that it failed to record both the substance of the point of order and the rationale for the chair's ruling. The Presbytery will ensure that both are recorded in the case of a point of order in the future.

e. **That the following responses to the 53rd GA be found unsatisfactory,**

therefore new responses shall be submitted to the following GA:

2025-01: Jan 20, 2024 (*BCO* 15- 1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

Response [2026]: The Presbytery acknowledges that minutes of commissions are to be included in the minutes of Presbytery. It is unclear from this notation what commission's minutes were not included in the Presbytery minutes, but nonetheless the Presbytery will ensure that commission minutes are included in the the Presbytery minutes going forward.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

2025-02: Jan 20, 2024 (*BCO* 18-2) — No record of six months membership for candidate.

Response [2026]: The Presbytery acknowledges and agrees that it failed to include a record that Mr. [Name Omitted] had been a member of the endorsing church. This was an oversight as Mr. [Name Omitted] had been a member of the endorsing church for more than six months at the time he came under care of the Presbytery.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

2025-03: Apr 13, 2024 (*BCO* 46-8) — Minister divested must be assigned to membership of a particular church.

Response [2026]: The Presbytery acknowledges that it failed to record that the deposed minister had been assigned to membership of a particular church. In this case, TE [Name Omitted] was demitting his office alongside his church leaving the denomination and changing its polity to remove the ordained office. As a result, there was no session to receive him. Nonetheless, the Presbytery should have noted that his membership was transferred to his church. The Presbytery will ensure it records such assignment going forward.

Rationale [2026]: No record that Presbytery transferred a divested member under *BCO* 38-3.a), 38-3.b) or 38-4.

2025-04: Apr 13, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam (experiential religion, history of the PCA, original languages, and theological and exegetical papers)

Response [2026]: The Presbytery acknowledges that it failed to record the complete requirements of the ordination exam for TE [Name Omitted]. The Presbytery did comply with the requirements in *BCO* 21-4 as part of the examination.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

2025-05: Apr 13, 2024 (*BCO* 19- 2; *RAO* 16-3.e.5) — All specific requirements of licensure exam not recorded (Christian experience and

call to preach the Gospel).

Response [2026]: The Presbytery acknowledges that it failed to record Mr. [Names Omitted and Mr. [Names Omitted]'s testimony of Christian experience and call to preach the Gospel. Both candidates did provide both as part of their examination on the floor of Presbytery. The Presbytery will ensure those items are recorded going forward.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

2025-06: Apr 13, 2024 (*BCO* 13-6) — Incomplete record of examination of TE transferring into Presbytery (no specific exams noted).

Response [2026]: The Presbytery acknowledges that it failed to record the specific topics examined in its examination of TE [Name Omitted]'s views under 13-6. It will ensure to record such topics in minutes going forward.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

2025-07: Apr 13, 2024 (*BCO* 46-6, 13-7) — No record regarding the reception of a certificate of dismission from transferring presbytery

Response [2026]: The Presbytery acknowledges that it failed to record that it had received a certificate of dismission from the transferring presbytery. The Stated Clerk had received that certificate and acknowledged its receipt to the Presbytery. The Presbytery will endeavor to record the receipt of such certificates going forward.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

2025-09: Jul 18, 2024 (*BCO* 8-7) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church.

Response [2026]: The Presbytery acknowledges and agrees with this exception. The Presbytery will ensure it inquires into and records in its records all of the requirements in *BCO* 8-7.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

2025-11: Jul 18, 2024 (*BCO* 46-6, 13-7) — No record regarding the reception of a certificate of dismission from transferring presbytery or of the identity of the transferring presbytery.

Response [2026]: The Presbytery acknowledges that it failed to record that it had received the certificate of dismission from Heritage Presbytery for TE [Name Omitted]; however, the Presbytery disputes the second point as it did record in 2024.117.8 that TE [Name Omitted] was transferring from Heritage Presbytery.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

32. That the Minutes of **Korean Capital Presbytery:** *(61-0-1)*

a. Be approved without exception: **Oct 07, 2024; Dec 15, 2024**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Apr 07, 2025 (*BCO* 13-6; *RAO* 16-3.e.5) — Incomplete record of examination of a minister transferring from another denomination.

2026-02: Oct 06, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exams.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-03: Apr 3, 2023 (*BCO* 13-9.b; *BCO* 40-1) — Incomplete record of review of records of church Sessions.

Response [2025]: We regret this oversight. Many of our church sessions have been lacking response to the call of the stated clerk to submit their minutes in the past. We are restructuring the process of our session minutes review committee so that the review is done before the presbytery and trying to better remind the sessions about and enforce the session minutes submission requirements.

Rationale [2025]: Presbytery continued the error by failing in 2024 to review the minutes of any session.

Response [2026]: We apologize for the lack of session reviews in the past. We have encouraged all our sessions to submit their minutes and almost all the churches have submitted for the 2025 fall stated meeting. We will include the submission status for each church and review details in the minutes for the fall meeting on 10/6/2025.

2024-08: Oct 2, 2023 (*BCO* 13-9.b; *BCO* 40-1) — Results of review of records of church Sessions not stated.

Response [2025]: We regret the oversight. The session minutes review committee failed to report on their work. We will remind the committee to be more diligent in reporting their review work in the future.

Rationale [2025]: Presbytery continued the error by failing in 2024 to review the minutes of any session.

Response [2026]: We apologize for the lack of session reviews in the past. We have encouraged all our sessions to submit their minutes and almost all the churches have submitted for the 2025 fall stated meeting. We will include the submission status for each church and review details in the minutes for the fall meeting on 10/6/2025.

2025-01: General 2024 (*BCO* 40) — There are no reviews of the minutes of Sessions in 2024. This is at least the second year in a row for this exception.

Response [2026]: We apologize for the lack of session reviews in the

past. We have encouraged all our sessions to submit their minutes and almost all the churches have submitted for the 2025 fall stated meeting. We will include the submission status for each church and review details in the minutes for the fall meeting on 10/6/2025.

2025-02: General 2024 (*BCO* 19-6) — No record of reports on interns at each stated meeting.

Response [2026]: We deeply apologize for this oversight. Some of the interns submit their "undercare" reports which are really the report on their internship. Also the exam committee reviews the supervisors' evaluation of the interns which are submitted at the exam committee interviews at the time of the ordination exams. But from now on, we will record the status of each intern as part of the exam committee report in the presbytery minutes. In our presbytery, the exam committee also oversee the interns.

2025-03: General 2024 (*BCO* 8-7; *BCO* 8-6; *BCO* 13-2) — There are no annual reports for over half the TEs serving out of bounds (including missionaries with non-PCA calls), there are almost no reports from TEs without call, and there are no annual reports for about half the men under care.

Response [2026]: We deeply apologize for this oversight and will endeavor to be more diligent in receiving the annual reports for all TEs, and those who are under care. For the 2025 fall meeting, we have received many of the out-of-bounds and almost all of the under care reports, which will be included in the minutes. We will remind the without call pastors to file annual reports, which will be done for the spring of 2026 meeting.

2025-04: General 2024 (*BCO* 18-2; *BCO* 18-3; *BCO* 19-7) — No record of sessional endorsements or six months membership for ones coming under care; no record of charges to candidates; no record of the nature of internships that are established.

Response [2026]: We deeply regret this oversight and our failure to record the appropriate information. We have corrected the minutes which can be seen in our minutes of the 67th stated meeting. All our under care candidates are required to indicate their session endorsement and six months membership in the church. The exam committee reviews them during the interview and the presbytery members are given the information at the stated presbytery meetings. The information which is included in the presbytery binder failed to be included in the minutes. We will make sure to include it for the future minutes.

2025-05: Apr 3, 2023 (*WLC* 109) — Presbytery ruled the following stated difference put forth by a candidate for licensure to be more than semantic, but not "out of accord with any fundamental of our system of

doctrine." "I'd like to request an exception to *WLC* 109 where it speaks against making a representation of God. I personally believe that the second commandment refers to not making images of "idols" (cf. the NLT translation) rather than not making images of any persons of the Godhead." If the candidate views the making of images to any of the persons of the Godhead as an acceptable practice, it would seem that this is "out of accord with any fundamental of our system of doctrine because the difference is either hostile to the system or strikes at the vitals of religion" (*BCO* 19-2.b.3.f). The candidate's position seems to run directly contrary to Deuteronomy 4:15-17, and it appears to undercut the regulative principle of worship as set forth in *WCF* XXI-1; *WLC* 109 and *WSC* 51.

Response [2026]: We apologize for our oversight in this matter, the candidate was further questioned regarding his views on the floor and based on his clarifications our presbytery found his views not to be out of accord with the fundamentals of our religion. In addition, the candidate in question is no longer associated within the bounds of our denomination, and we thank the RPR for their diligence in this matter.

2025-06: Apr 8, 2024 (*BCO* 21-5; *BCO* 21-6) — During the installation of an Assistant Pastor the questions are posed to the Congregation rather than the Session. Further, there is no evidence of who opened or closed the Commission meeting in prayer, who preached the sermon, or the text of the sermon.

Response [2026]: We apologize for the oversight. The questions were directed to the session but the report fail to correct the template form language at that point. We corrected the commission report and included it with 67th minutes.

2025-08: Oct 7, 2024 (*BCO* 25-11, para 3) — No record that the required 30 day notice was given for the Congregational meeting on a church's withdrawal.

Response [2026]: We apologize for the oversight. We had confirmed that the congregational meeting notice went out 30 days prior to the meeting but failed to include it in the minutes. We have corrected the Oct 7, 2024 minutes.

2025-09: Oct 7, 2024 (*BCO* 13-6; *BCO* 21-1) — No record of examination or approval of call for a TE transferring into Presbytery from another PCA Presbytery.

Response [2026]: We apologize for the oversight. His call was presented and reviewed by the presbytery on the floor. We have corrected the Oct 7, 2024 minutes and included his call letter as appendix.

2025-10: Oct 7, 2024 (*BCO* 13-1) — Presbytery may not amend its Standing Rules to **mandate** that TE members of Presbytery pay an annual $50 fee, nor may Presbytery charge a mandatory fee for examinations. This

would be tantamount to a local Session mandating that all church members pay a fee to be examined for membership or to be members in good standing.

Response [2026]: We have discussed this with our presbytery and decided to change the standing rule to strike the mandatory language for the TE membership fee but suggest it as a guideline. As for the examination fee, we decided to remove the fee.

2025-12: Oct 7, 2024 (*BCO* 46-6; *BCO* 21-1) — A TE is transferred to another PCA Presbytery. No record of the call or other reason that is the basis of the transfer, and no record that a certificate of dismission was to be issued.

Response [2026]: We apologize for failing to properly record the details of the action. The transfer was due to an out-of-bounds ministry in the jurisdiction of a PCA presbytery, to which he was eventually transferred in the fall of 2025. We did issue a certificate of dismission through the presbytery portal. We will do better in recording the details of the transfers of TEs into other PCA presbyteries going forward.

2025-13: Dec 15, 2024 (*BCO* 8-7) — No record that Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church.

Response [2026]: We regret our oversight in this matter, we have reached out to the TE in question, and he has informed us that he will indeed have full freedom to maintain and teach the doctrine of our church. The correction to our minutes can be found in the minutes of our 67th Stated Meeting.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-07: Apr 8, 2024 (*BCO* 22-2; *BCO* 22-3; *BCO* 21-5; *BCO* 21-6) — A TE's call is changed from Assistant to Associate Pastor, but there is no evidence he is then installed on the basis of the new call where the vows are with the Congregation rather than the Session.

Response [2026]: We apologize for the oversight. We will make sure the proper installation is done for the installation of associate pastors who were previously assistant pastors from now on.

Rationale [2026]: Failure to correct the action (*RAO* 16-10.b.2). Promising to do it right "from now on" does not fix the status of the specific Teaching Elder cited in the exception. Presbytery has not indicated whether it proceeded to actually install this specific minister, nor did they amend the record if the installation had, in fact, already occurred.

2025-11: Oct 7, 2024 (*BCO* 23-1) — No record of Congregational concurrence in dissolution of calls.

Response [2026]: We apologize for the oversight. All the pastoral

dissolutions were decided at the session for the assistant pastors and at the congregational meeting for the associate pastors and senior pastors. We will do better in recording the specifics of the dissolution meeting records going forward.

Rationale [2026]: Failure to correct the record (*RAO* 16-10.b.1). Because this was a recording error, simply promising to "do better going forward" is insufficient. It is unclear that Presbytery amended the October 7, 2024 minutes to actually record the missing congregational / sessional occurrences for those specific dissolutions.

33. That the Minutes of **Korean Central Presbytery:** *(63-0-0)*

a. Be approved without exception: **Oct 8–9, 2024**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 13-1) — Standing Rules Article 2 defines the Presbytery membership as including ruling elders, but not churches, in conflict with *BCO* 13-1.

2026-02: General 2025 (*BCO* 24) — Standing Rules Article 17 authorizes relation of associate ruling elder, which is not defined in *BCO* 24.

2026-03: Apr 8–9, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-04: Apr 8–9, 2025 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of exam for minister seeking admission from another denomination.

2026-05: Apr 8–9, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

2026-06: Apr 8–9, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

2026-07: Apr 8–9, 2025 (*BCO* 20-1) — No record of call to a definite work.

2026-08: Apr 8–9, 2025 (*BCO* 46-8) — No record of assignment of former minister to membership in some particular church, subject to the approval of the Session of that church.

2026-09: Apr 8–9, 2025 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of exam for minister seeking admission from another denomination.

2026-10: Apr 8–9, 2025 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of exam for minister seeking admission from another denomination.

2026-11: Apr 8–9, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

2026-12: Apr 8–9, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

2026-13: Apr 8–9, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

2026-14: Apr 8–9, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

2026-15: Apr 8–9, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission

not entered in Presbytery minutes.

2026-16: Aug 10, 2025 (*BCO* 13-12) — No record of 10-day notice for called meeting.

2026-17: Oct 14, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session and six months membership for candidate.

2026-18: Oct 14, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

2026-19: Oct 14, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

d. **That the following responses to the 53rd GA be found satisfactory:**

2022-01: Apr 13–14, 2021 (*BCO* 13-11, 31-2, 32-2, 32-3, 32-4, 32-5, 36-1, 36-5, 37-3) — There is insufficient record in the minutes of actions taken by the Presbytery (as well as documents in support of those actions) pursuant to their handling of an ecclesiastical trial against TE (Name Omitted), such as, but not limited to the allegations against him, the recommendations from an ad interim committee appointed to consider these allegations, the indictment of the prosecutor, the imposition and removal of censure, and several additional motions related to this situation. These missing items need to be either recreated or collected and submitted to the 50th General Assembly.

Response [2023]: Korean Central Presbytery agrees with this exception and humbly apologizes for our oversight in this matter. We are submitting the following documents to the 50th General Assembly in response to this request by CRPR: (1) the original allegations against the TE as submitted to the Presbytery; (2) the findings and recommendations of the ad-interim committee as summarized in their report as received by the Presbytery; and (3) the minutes from this stated meeting, which summarizes our actions on the committee's recommendations. In addition, some of the actions from this April 2021 were the subject of a complaint that was adjudicated by the Standing Judicial Commission in June 2022

Rationale [2023]: *SJC* Case 2021-11). While the *SJC* sustained the complaint against some of Presbytery's procedural errors in this matter, it also ruled that many of these defects were no longer correctable, including the absence of an indictment from the prosecutor.

Response [2024]: Korean Central Presbytery agrees with this exception and humbly apologizes for our oversight in this matter. We are submitting the following documents to the 50th General Assembly in response to this request by CRPR: (1) the original allegations against the TE as submitted to the Presbytery; (2) the findings and recommendations of the ad-interim committee as summarized in their report as received by the Presbytery; and (3) the minutes from this stated meeting,

which summarizes our actions on the committee's recommendations. In addition, some of the actions from this April 2021 were the subject of a complaint that was adjudicated by the Standing Judicial Commission in June 2022 (SJC Case 2021-11). While the SJC sustained the complaint against some of Presbytery's procedural errors in this matter, it also ruled that many of these defects were no longer correctable, including the absence of an indictment from the prosecutor.

Rationale [2024]: Though Presbytery acknowledges their error and has sent some documents, the report from the interim committee seems to be missing their respective and referenced appendices (see: *RAO* 16-3.e.8), in addition to a letter of confession from the confessing TE.

Response [2025]: Presbytery agrees with the exception and acknowledges our error. The TE's confession letter has been submitted as requested.

Rationale [2025]: Presbytery needs to correct its minutes.

Response [2026]: KCP agrees with the exception and apologizes once again for our error. We will correct the Minutes of this April 2021 Meeting by including all of the referenced items—specifically, the Report of the Ad-Interim Committee and the TE's letter of confession.

2025-01: Apr 9–10, 2024 (*BCO* 38-2) — No record that minister came forward and state lack of call to ministry at prior meeting or that full deliberation of presbytery occurred.

Response [2026]: The Korean Central Presbytery (hereafter "KCP") agrees with the exception and apologizes for our error. The minister informed our Presbytery's Stated Clerk about his lack of call to ministry before our previous Stated Meeting in October 2023, and he requested demission from his office. He was unable "come forward and state his lack of call" in person at this Meeting since he was in Korea at the time. At that Meeting our Presbytery decided to consider this request at our next Stated Meeting in accordance with *BCO* 38-2. The Minutes of this October 2023 Meeting record this fact, but we neglected to mention it again in the Minutes of our April 2024 Meeting. Our Presbytery did deliberate before finally approving the request for demission. We will correct these Minutes through a motion to amend something previously adopted, and we will be more careful in the future.

2025-02: Apr 9–10, 2024 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of exam for minister seeking admission from another denomination.

Response [2026]: KCP agrees with the exception and apologizes for our error. The transfer candidate did present proof of his bachelor's degree and seminary degree to our Candidates and

Credentials Committee, and he was examined in all of the subjects required in *BCO* 21 (experiential religion, Greek and Hebrew, Bible content, theology, sacraments, church history, history of the PCA, principles of church government, preached sermon, theological paper, and exegesis paper. We neglected to record each of these specific items, but we will correct our Minutes through a motion to amend something previously adopted. We also promise to be more careful in the future.

2025-03: Apr 9–10, 2024 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of exam for minister seeking admission from another denomination

Response [2026]: KCP agrees with the exception and apologizes for our error. The transfer presented his bachelor's degree and seminary degree to our Candidates and Credentials Committee, and he was examined in experiential religion, Greek, Bible content, theology, sacraments, church history, history of the PCA, principles of church government, preached sermon, theological paper, and exegesis paper. We neglected to record each of these items. We also did not note that the Hebrew language requirement was waived by a 3/4 vote of the Presbytery since the candidate's seminary did not require this subject for their M.Div. students. The candidate agreed to remedy this deficiency through a self-study program approved by our Credentials Committee. We will correct our Minutes through a motion to amend something previously adopted, and we promise to be more careful in the future.

2025-04: Oct 8–9, 2024 (*BCO* 23-1) — No record that congregation was cited to appear and show cause re severance of call of TE [Name Omitted]; TE [Name Omitted]; TE [Name Omitted].

Response [2026]: KCP agrees with the exception and apologizes for our error. We simply forgot to follow this requirement in each case as specified in *BCO* 23-1. Since all three ministers have subsequently accepted new calls approved by our Presbytery, it is now too late for us to correct our actions and our record. But we promise to be more careful to abide by this requirement when we dissolve any pastoral relations in the future.

2025-05: Oct 8–9, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record for ordination exam.

Response [2026]: KCP agrees with the exception and apologizes for our error. The history of the PCA was indeed included in the candidate's examination, but we neglected to include this in our record. We will correct our Minutes through a motion to amend something previously adopted, and we promise to be more careful in the future.

e. **Standing Judicial Commission (SJC) Compliance:**

Korean Central Presbytery has not recorded the full decision in their minutes

and/or has not provided a statement describing how the lower court has complied with any amends contained therein (*BCO* 40-2.4; *OMSJC* 17.1.e-f):

2023-21 — Kang v. Korean Central

34. That the Minutes of **Korean Eastern Presbytery:** *(63-0-0)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **Mar 11, 2025**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 13-11; *RAO* 16-3.b) — All Minutes missing all referenced supporting documents. Calls, Reports, etc.

2026-02: Sep 16, 2025 (*BCO* 13-8) — No record of examination of REs of a church received into Presbytery.

2026-03: Sep 16, 2025 (*BCO* 8-7) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church.

d. **That the following responses to the 53rd GA be found satisfactory:**

2023-01: General 2022 (*BCO* 13-9.b; 40-1) — No record of review of records of church Sessions.

Response [2024]: We respectfully disagree with this exception. The following motion appears in our 2/11/23 minutes under the report of the Stated Clerk (p. 34): "MSC to approve the responses to RPR regarding exceptions of substance to the 2022 minutes of presbytery, and to take the actions stated in the responses."

Rationale [2024]: No record that Presbytery corrected its action. No review of Presbytery records have been recorded for the current or past year.

Response [2026]: KEP admits the mistake for not actively requesting and encouraging sessions to submit their minutes. Record Examination Committee will work actively to receive additional session minutes and review them thoroughly going forward. Record Examination Committee reviews minutes in the spring of each year.

Minutes received and reviewed in Spring 2024: [Church Name Omitted], [Church Name Omitted]

Minutes received and reviewed in Spring 2025: [Church Name Omitted], [Church Name Omitted]

2023-02: General 2022 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

Response [2024]: Some of OB ministers submitted their ministry report with excuse absence request, and KEP kept the report in the docket of stated meeting. KEP apologizes for submitting minutes without the docket material. The stated clerk will make sure to include OB ministers' report when submitting the meeting minutes.

Rationale [2024]: No record that Presbytery corrected its record or its actions. No OB ministers' reports have been included for the current or prior year.

Response [2026]: The presbytery acknowledges the fault. KEP reminded all OB ministers to submit the reports. As a result, more reports were received in the fall of 2025 presbytery meeting. Out of Bounds TEs Report received from:
[Names Omitted] (docket P. 38)? Missionary Report received from:
[Names Omitted] (docket P. 32)

2024-02: Sep 12, 2023 (*BCO* 19-2.f) — No record of requiring statement of differences with our Standards.

Response [2025]: No Response Received.

Response [2026]: The presbytery acknowledges the mistake of not recording the statement of differences to our standard for the licensure exam. Mr. [Name Omitted] did not have any differences to the Westminster standards.

2024-04: Mar 14, 2023 (*BCO* 19-2) — All specific requirements of licensure exam not recorded.

Response [2025]: No Response Received.

Response [2026]: KEP regrets for omitting some part of the licensure exam for Mr. [Name Omitted]. The candidate did speak about his Christian experience and his call to ministry during the floor exam. KEP members asked questions about his calling and the candidate's answers were satisfactory.

2024-05: Mar 14, 2023 (*BCO* 13-6) — Incomplete record of examination of TE transferring into Presbytery.

Response [2025]: No Response Received.

Response [2026]: KEP apologizes for omitting some items in the minutes for transfer exam. Minister [Name Omitted] was examined according to guidelines of *BCO* 21-4 and 13-6 but the presbytery failed to note it in the minutes that he also passed the examination on the sacraments.

2024-06: Mar 14, 2023 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of exam for minister seeking admission from another denomination.

Response [2025]: No Response Received.

Response [2026]: The presbytery apologizes for omitting full detail of the transfer exam in the minutes. Minister [Name Omitted] was thoroughly examined by credential committee in accordance with *BCO* 13-6 and 21-4. The committee recommended the candidate to the floor exam. After candidate shared about his Christian experience and ministry background, KEP members asked questions from *BCO* items including mentioned in this exception (Bible, and Sacraments). The candidate was not tested on language portion because he had completed the

Hebrew and Greek courses.

2024-07: Mar 14, 2023 (*BCO* 21-4; *BCO* 13-6) — No record of requiring statements of differences with our Standards.

Response [2025]: No Response Received.

Response [2026]: KEP apologizes for missing some items in the minutes. Minister [Name Omitted] did not have stated differences to our standards.

2024-08: General 2023 (*BCO* 13-6; *BCO* 21-5) — A minister admitted from another denomination was not asked the questions put to candidates at their ordination.

Response [2025]: No Response Received.

Response [2026]: KEP apologizes for not properly recording the transfer exam. After the examination, KEP asked the question to the candidate from *BCO* 13-6, and he answered affirmatively.

2024-09: General 2023 (*BCO* 13-9.b; *BCO* 40-1) — No record of review of records of church Sessions.

Response [2025]: No Response Received.

Response [2026]: KEP admits the mistake for not actively requesting and encouraging sessions to submit their minutes. Record Examination Committee will work actively to receive additional session minutes and review them thoroughly going forward. Record Examination Committee reviews minutes in the spring of each year.

Minutes received and reviewed in Spring 2024: [Church Name Omitted], [Church Name Omitted]

Minutes received and reviewed in Spring 2025: [Church Name Omitted], [Church Name Omitted]

2024-10: General 2023 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

Response [2025]: No Response Received.

Response [2026]: The presbytery acknowledges the fault. KEP reminded all OB ministers to submit the reports. As a result, more reports were received in the fall of 2025 presbytery meeting. Out of Bounds TEs Report received from:

[Names Omitted] (docket P. 38)? Missionary Report received from:

[Names Omitted] (docket P. 32)

2024-11: General 2023 (*BCO* 18-6) — Annual reports of candidates not included.

Response [2025]: No Response Received.

Response [2026]: The presbytery apologizes for not properly receiving the annual reports from the candidates. We did not receive any reports this year. We will ensure not to overlook this item in the future and record the result in the minutes.

2024-12: Mar 14, 2023 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission

not entered in Presbytery minutes, and these must be presented for review next year.

Response [2025]: No Response Received.

Response [2026]: The presbytery apologizes for omitting commission minutes for installing TE [Name Omitted] and TE [Name Omitted]. [Presbytery submitted commission minutes for review]

2025-01: General 2024 (*BCO* 8-7) — No record of annual reports of TEs laboring out of bounds.

Response [2026]: The presbytery acknowledges the fault. KEP reminded all OB ministers to submit the reports. As a result, more reports were received in the fall of 2025 presbytery meeting. Out of Bound TEs Report received from:

[Names Omitted] (docket P. 38)? Missionary Report received from:

[Names Omitted] (docket P. 32)

2025-02: General 2024 (*BCO* 13-9.b; *BCO* 40-3) — Results of review of records of church sessions not stated.

Response [2026]: KEP admits the mistake for not actively requesting and encouraging sessions to submit their minutes. Record Examination Committee will work actively to receive additional session minutes and review them thoroughly going forward. Record Examination Committee reviews minutes in the spring of each year.

Minutes received and reviewed in Spring 2024: [Church Name Omitted], [Church Name Omitted]

Minutes received and reviewed in Spring 2025: [Church Name Omitted], [Church Name Omitted].

2025-03: Mar 12, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

Response [2026]: KEP regrets for not clearly recording the ordination exam for Mr. [Name Omitted]. Credential committee thoroughly examined Mr. [Name Omitted] according to *BCO* 21-4 and he was recommended to floor exam.

He passed the exam on Bible, Theology, Sacraments, Church and PCA History, and *BCO*. Mr. [Name Omitted] did not have any stated differences to our standards

2025-04: Mar 12, 2024 (*BCO* 21-4; *BCO* 13-6) — Incomplete record of ordination exam (transfer from another denomination).

Response [2026]: KEP apologizes for having omitted the full record of the candidate in the minute. Mr. [Name Omitted] was thoroughly examined according to *BCO* 21-4 and *BCO* 13-6 by credential committee. The committee presented that the candidate has met all the requirements for the ordination exam. All the items mentioned in this exception (education

requirements, internship, sermon, theological paper, and original language) were examined by the credential committee. The candidate took the floor exam on each item and passed as a whole.

2025-05: Mar 12, 2024 (*BCO* 21-1; *BCO* 20-1) — No record of call to a definite work.

Response [2026]: KEP apologizes for not including the call for those 3 candidates. Mr. [Name Omitted] was called to serve at [Church Name Omitted] assistant pastor), Mr. [Name Omitted] was called to serve at[Church Name Omitted] (senior pastor), and Mr. [Name Omitted] was called to serve at [Church Name Omitted] (assistant pastor).

2025-06: Mar 12, 2024 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of TE transferring into presbytery.

Response [2026]: KEP regrets for omitting a few items in the minutes for transferring candidate. Minister [Name Omitted] shared his Christian experience before the floor exam of KEP. He was transferred from the Eastern Presbytery of KPCA.

2025-07: Sep 10, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

Response [2026]: Mr. [Name Omitted] was trained and shepherded under KEP from his under care. KEP examined and approved items mentioned in this exception throughout the course of shepherding.

Stated clerk has the complete record of Mr. [Name Omitted]'s education, internship, sermon, and paper.

2025-08: Sep 10, 2024 (*BCO* 21-1; *BCO* 20-1) — Commission created to ordain and install a man with no record of call to a definite work being received and approved by Presbytery.

Response [2026]: KEP apologizes for not properly recording the call for the candidate. Mr. [Name Omitted] received a call to serve at [Church Name Omitted] as an assistant pastor.

2025-09: Sep 10, 2024 (*BCO* 19-2; *RAO* 16-3.e.5) — All specific requirements of licensure exam not recorded.

Response [2026]: KEP apologizes for not recording all items for Mr. [Name Omitted]'s licensure exam. After reviewing the minutes from the presbytery meeting (9/10/2024), the presbytery found out that we did not record about the stated difference. Mr. [Name Omitted] did not have any stated differences to our standards and *BCO*.

2025-10: Sep 10, 2024 (*BCO* 13-6) — Incomplete record of examination of TE transferring into presbytery.

Response [2026]: The presbytery regrets for omitting some items for transfer exam in minutes. Minister [Name Omitted] was thoroughly examined by the credential committee that

recommended to the floor. The candidate did not have any differences to our standards. The candidate took the floor exam on each item stated in *BCO* 13-6. He passed the exam as a whole and accepted as a member of KEP.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2024-01: Sep 19, 2023 (*BCO* 8-7; *BCO* 20-1) — Presbytery approved an out-of-bounds call without assurance that the TE will have full freedom to maintain and teach the doctrine of our church (8-7), without record that the TE is engaged in preaching and teaching the Word (8-7), and without stating reasons why it considers the out-of-bounds work to be a valid Christian ministry (20-1).

Response [2025]: No Response Received.

Response [2026]: TE [Name Omitted] was approved as out of bounds call to the “rooted ministry”. The rooted ministry disciples parents and youth through teaching God’s Word. It also equips God’s people through conferences, mentoring, and different curriculums.

Rationale [2026]: While there is a statement from the KEP regarding what the "Rooted Ministry" is, they have failed to communicate that TE [Name Omitted] will have full freedom to maintain and teach the doctrine of the church, is engaged in preaching and teaching the Word. The response received seems to answer the question as to whether it is a valid Christian ministry but not the other needs. A TE should be ordained only to a ministry that indeed requires a TE, otherwise he may be employed wherever he wishes and as a member of presbytery would be "without call" and treated under applicable rules.

2024-03: Sep 12, 2023 (*BCO* 19-2) — All specific requirements of licensure exam not recorded.

Response [2025]: No Response Received.

Response [2026]: KEP regrets for omitting some part of the licensure exam for Mr. [Name Omitted]. The candidate introduced himself to the KEP with sharing his Christian experience and the call to Gospel ministry. KEP members asked questions and encouraged him about his calling.

Rationale [2026]: The response only indicates that part of the licensure examination occurred (Christian character and call to ministry—*BCO* 19-2.a). The minutes need to indicate that all parts of *BCO* 19-2 were fulfilled.

35. That the Minutes of **Korean Northeastern Presbytery:** *(61-0-0)*

a. Be approved without exception: **Apr 22, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Sep 9, 2025 (*BCO* 8-7) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church.

36. That the Minutes of **Korean Northwest Presbytery:** *(64-0-0)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Apr 7–8, 2025 (*BCO* 38-3.a) — New membership of a demitted TE not recorded.

2026-02: Apr 7–8, 2025 (*BCO* 20-1) — Minutes are not clear if two candidates were examined for ordination or transfer.

2026-03: Apr 7–8, 2025 (*BCO* 20-1) — No record of call to a definite work.

2026-04: Oct 13–14, 2025 (*BCO* 13-11; *BCO* 43-2) — Complaint referenced in minutes is not included or summarized.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-02: Apr 8–9, 2024 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery in dissolution of pastoral relation.

Response [2026]: Regarding the dissolution of the pastoral relationships of [Names Omitted] with [Church Name Omitted], the Presbytery clarifies that although the congregation was not formally cited, the dissolution was conducted with appropriate oversight. [Name Omitted], serving as a representative of the Appropriation Committee and moderator of the Regional Fellowship, visited the church to meet with both the Session and the members. Through a duly called congregational meeting, he officially confirmed that the dissolution of the pastoral relationships was conducted in an orderly and mutual manner. Therefore, the Presbytery submits that the intent of the constitutional requirements was fully met through this direct oversight and congregational approval.

2025-04: Apr 8–9, 2024 (*BCO* 20-1) — No record of call to a definite work; no record of reasons why Presbytery considers an out-of-bounds work to be a valid Christian ministry.

Response [2026]: TE [Name Omitted] is currently serving as an associate pastor at [Church Name Omitted] in San Diego, having been duly called by the congregation. As [Church Name Omitted] is a non-denominational body, the Presbytery granted him permission to labor out-of-bounds pursuant to the provisions of the Book of Church Order. The omission of specific details regarding his field of ministry in the previous minutes was an administrative oversight by the Clerk. Subsequently, the Clerk requested the formal Call to a Definite Work, which has now been duly received and filed for the record.

2025-05: Apr 8–9, 2024 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of examination.

Response [2026]: TE [Name Omitted], ordained in the PCA Korean Capital Presbytery, was examined for transfer into the Korean Northwest Presbytery in accordance with *BCO* 13-6.a. We confirm that he has successfully sustained examinations in Christian Experience, Theology, Bible Content, and Church Government, and has fulfilled all requirements, including the written essays and a sermon on Genesis 3:15. Due to a clerical oversight by the Presbytery's Stated Clerk and the Examination Committee, the examination on "Sacraments" was mistakenly replaced by "Bible Content" in the initial process. The Presbytery acknowledges this as an administrative error. To rectify this and ensure full constitutional compliance, the examination on the Sacraments will be officially administered and recorded during the Spring Stated Meeting of 2026.

2025-06: Oct 14–15, 2024 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery in dissolution of pastoral relation.

Response [2026]: Regarding the dissolution of the pastoral relationship between TE [Name Omitted] and [Church Name Omitted], the Presbytery clarifies that although the congregation was not formally cited, the dissolution was duly approved through a legal congregational meeting. Furthermore, TE [Name Omitted], acting as the moderator of the Northern Regional Fellowship, met with the Session and the members to oversee and confirm the mutual agreement of the dissolution. The Presbytery, therefore, considers this action to be in substantial compliance with the spirit of the *BCO*.

2025-07: Oct 14–15, 2024 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery in dissolution of pastoral relation.

Response [2026]: Regarding the dissolution of the pastoral relationship between TE [Name Omitted] and [Church Name Omitted], the Presbytery reports that while the congregation was not formally cited, the dissolution was mutually agreed upon and officially approved through a congregational meeting. As the resignation was voluntary and did not involve any disciplinary or contentious issues, the Presbytery determined that a formal summons was unnecessary. We confirm that the dissolution was conducted in good order and with the full consent of the local church.

2025-08: Oct 14–15, 2024 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery in dissolution of pastoral relation.

Response [2026]: Regarding the dissolution of the pastoral relationship between TE [Name Omitted] and [Church Name Omitted], the Presbytery clarifies that although the

congregation was not formally cited, the dissolution was conducted through a direct meeting with the church members. Through this process, the Presbytery confirmed the congregation's understanding and consent regarding the dissolution. Therefore, we report that the pastoral relationship was dissolved in a pastoral and orderly manner with the full knowledge of the local body.

2025-09: Oct 14–15, 2024 (*BCO* 13-10) — No record of notice of dissolution sent to local church; no record of consent of individual members or Session of receiving church in transfer of membership.

Response [2026]: Regarding the dissolution of [Church Name Omitted], the Presbytery reports that prior to the dissolution, all eligible members were duly connected to [Church Name Omitted], a nearby congregation within our Presbytery. This ensures that the spiritual care and transfer of the members were properly handled. The failure to record this specific action separately in the previous minutes was an administrative oversight by the Clerk, and we hereby rectify the record to reflect that the transfer of members was conducted in good order.

2025-10: Oct 14–15, 2024 (*BCO* 13-10) — No record of notice of dissolution sent to local church; no record of Presbytery action to resolve membership status of affected individuals.

Response [2026]: Regarding the dissolution of [Church Name Omitted], the Presbytery confirms that all members eligible for transfer were appropriately connected to nearby local churches prior to the dissolution. This process ensured that all congregants remained under continuous pastoral care. The absence of a separate record regarding these transfers in the previous minutes was an administrative oversight by the Clerk, and we hereby submit this clarification to rectify the official record.

2025-11: Oct 14–15, 2024 (*BCO* 24-1; *BCO* 11-4; PP 6; *BCO* 12-5.b) — Minutes contain reference to men being examined for the office of ruling elder. This appears to be the presbytery exercising oversight over the election of ruling elders.

Response [2026]: The Presbytery reports that the examination of the candidate for ruling elder was conducted by the Presbytery’s committee at the explicit request of the local church. As the session requested the Presbytery to administer the examination on their behalf, the committee performed this duty to ensure the candidate’s qualifications were met in accordance with the church's needs. This action was taken as a formal assistance to the local session and has been duly recorded to reflect the proper exercise of the Presbytery’s oversight.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-01: General 2024 (*BCO* 13-9.b; *BCO* 40-1) — Incomplete record of review of records of church Sessions.

Response [2026]: The Presbytery confirms that the review of the Session records was duly completed in accordance with the required procedures. We clarify that the absence of verification marks and signatures was limited only to the copy submitted for review; the original records contain all appropriate verifications and signatures in proper order. We hereby report that the original documents are fully compliant with the administrative standards of the Presbytery.

Rationale [2026]: Presbytery should kindly submit the corrected records with next year's response.

2025-03: Apr 8–9, 2024 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

Response [2026]: Regarding the reception of [Church Name Omitted], the Presbytery reports that the committee conducted a thorough review of all submitted documents and held a formal interview with the church leadership. It was confirmed that the church had been duly organized through a congregational meeting and had successfully completed its registration with the civil authorities. The committee provided a full report of this process and its findings to the Presbytery. The Presbytery acknowledges an administrative error in mistakenly allowing the Committee on Ministry to function as a commission regarding this reception. We recognize this procedural oversight and hereby commit to constituting a proper commission for all such future actions to ensure strict adherence to the Book of Church Order.

Rationale [2026]: Presbytery needs to ratify its committee's action.

2025-12: Oct 14–15, 2024 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

Response [2026]: Regarding the reception of [Church Name Omitted], the Presbytery clarifies that TE [Name Omitted], as a committee representative, conducted a site visit and met with the congregation to ensure a proper transition. To allow for thorough preparation, the committee recommended postponing the petition for one session, and the church subsequently reapplied and was received at the following session. The Presbytery acknowledges an administrative error in mistakenly allowing the Committee on Ministry to function as a commission regarding this matter. We recognize this procedural oversight and hereby commit to constituting a proper commission for such responsibilities in the future to ensure full compliance with the Book of Church Order.

Rationale [2026]: Presbytery needs to ratify its committee's action.

37. That the Minutes of **Korean Southeastern Presbytery:** *(62-0-0)*
    a. Be approved without exception: **None.**
    b. Be approved with exception of form: **None.**
    c. **Be approved with exception of substance:**
    2026-01: General 2025 (*RAO* 16-10.a) — No response to the Assembly concerning disposition of an exceptions of substance.
    2026-02: General 2025 (*BCO* 13-9.b; *BCO* 40-1) — No record of review of records of church Sessions.
    2026-03: Apr 7–8, 2025 (*BCO* 13-6) — Incomplete record of examination of TE transferring into Presbytery.
    2026-04: Apr 7–8, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our standards.
    2026-05: Apr 7–8, 2025 (*BCO* 21-4; *RAO* 15-3.e.5) — Incomplete record of ordination exam.
    2026-06: Apr 7–8, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.
    2026-07: Apr 7–8, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.
    2026-08: Apr 7–8, 2025 (*BCO* 21-5; *BCO* 15-2) — The Presbytery convenes to Ordain and Install. This can be done by commission but not committee. The commission must have at least 2 TEs and 2 REs.
    2026-09: Apr 7–8, 2025 (*BCO* 23-1) — No record of congregational meeting in which dissolution of pastoral relations was requested.
    2026-10: Apr 7–8, 2025 (*BCO* 23-1) — No record of congregational meeting in which dissolution of pastoral relations was requested.
    2026-11: Aug 11, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered into Presbytery Minutes.
    2026-12: Aug 11, 2025 (*BCO* 13-12) — Notice for called meeting not in order – Notice was not recorded in the minutes.
    2026-13: Aug 11, 2025 (*BCO* 13-12; *RAO* 16-3.c.1) — Purpose of called meeting not recorded verbatim in the minutes.
    2026-14: Oct 6–8, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered into Presbytery Minutes.
    2026-15: Oct 6–8, 2025 (*BCO* 5-2.c; *BCO* 13–10) — No evidence proper procedures were followed to dissolve a church concerning members.
    2026-16: Oct 6–8, 2025 (*BCO* 23-1) — No record of congregational meeting in which dissolution of pastoral relationship was requested.
    2026-17: Oct 6–8, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.
    2026-18: Oct 6–8, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.
    2026-19: Oct 6–8, 2025 (*BCO* 23-1) — No record of congregational meeting in which dissolution of pastoral relationship was requested.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-01: Apr 10–11, 2023; Jun 26, 2023; Oct 2–3, 2023 (*BCO* 12-3) — No record of Session approval of interim moderator.

Response [2025]: No Response Received.

Response [2026]: KSEP agrees about the lack of clarity in our minutes (by calling it a "Session"). The petition was to appoint a TE to temporarily assist with the mission church, with the presbytery's commission serving as temporary session. We promise to be more careful about using precise terminology in the future.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2024-02: Oct 2–3, 2023 (*BCO* 8-6) — Evangelist title granted to TE in area with sufficient RE's.

Response [2025]: No Response Received.

Response [2026]: KSEP agrees that it was wrong for us to use the title "evangelist" here. Given that the church in question (although had REs present) had not yet officially joined the PCA, the presbytery wanted to grant the TE evangelist status only until the church in question will come into the PCA. The service that was held was not a particularization service, but a service in giving thanks for reception into KSEP and the PCA as a mission church. We promise to be more careful with our language in the future.

Rationale [2026]: No record that Presbytery corrected its actions (*RAO* 16-10.b.1). Presbytery has not indicated the correct status of Teaching Elder call and the nature of his work with the mission church.

f. **That the following responses shall be submitted to the following GA as no responses were received in 2026:**

2025-01: General 2024 (*BCO* 8-7; *BCO* 8-8) — No record of annual report(s) of TE(s) laboring out of bounds.

Response [2026]: No Response Received.

2025-02: General 2024 (*BCO* 13-2) — No record of annual report(s) of TE(s) without a call.

Response [2026]: No Response Received.

2025-03: General 2024 (*RAO* 16-10.a) — No response to the Assembly concerning disposition of an exception of substance.

Response [2026]: No Response Received.

2025-04: Apr 1–2, 2024 (*BCO* 20-1; *RAO* 16-3.e.6) — Specific arrangements of call not shown to be approved.

Response [2026]: No Response Received.

2025-05: Apr 1–2, 2024 (*BCO* 15-2; 21-4; *RAO* 16-3.e.5) — No/Incomplete record of ordination exam. "When the ordination of a minister is committed to a commission, the Presbytery itself shall conduct the

previous examination" (*BCO* 15-2).
Response [2026]: No Response Received.

2025-06: Apr 1–2, 2024 (*BCO* 46-6; *BCO* 13-7) — No record regarding the reception of a certificate of dismission from transferring presbytery. (May be accomplished through Clerks portal)
Response [2026]: No Response Received.

2025-07: Apr 1–2, 2024 (*BCO* 46-6; *BCO* 13-7) — No record regarding the reception of a certificate of dismission from transferring presbytery. (May be accomplished through Clerks portal)
Response [2026]: No Response Received.

2025-08: Apr 1–2, 2024 (*BCO* 8-6) — Evangelist title granted to TE in area with sufficient RE's.
Response [2026]: No Response Received.

2025-09: Oct 7–8, 2024 (*BCO* 18-2) — No record of endorsement by candidate's Session, and no record of six months membership for candidate.
Response [2026]: No Response Received.

2025-10: Oct 7–8, 2024 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.
Response [2026]: No Response Received.

2025-11: Oct 7–8, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.
Response [2026]: No Response Received.

2025-12: Oct 7–8, 2024 (*BCO* 20-1; *RAO* 16-3.e.7) — Specific arrangements of call not shown to be approved.
Response [2026]: No Response Received.

2025-13: Oct 7–8, 2024 (*BCO* 8-6) — Evangelist title granted to TE in area with sufficient RE's.
Response [2026]: No Response Received.

2025-14: Oct 7–8, 2024 (*BCO* 23-1) — No record that there was a meeting of the congregation and whether or not they concurred with the request for dissolution of pastoral relations.
Response [2026]: No Response Received.

2025-15: Oct 7–8, 2024 (*BCO* 8-6) — Evangelist title granted to TE in area with sufficient RE's.
Response [2026]: No Response Received.

g. **Standing Judicial Commission (SJC) Compliance:**
Korean Southeastern Presbytery has not completed the required amends. The review will be deferred to next year's Committee of Review of Presbytery Records (*BCO* 40-2.4; *OMSJC* 17.1.e-f).
2023-22 — Suh v. Korean Southeastern

38. That the Minutes of **Korean Southern Presbytery:** *(64-0-0)*
a. Be approved without exception: **None.**
b. Be approved with exception of form: **Jan 20, 2025**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*RAO* 16-10.a) — No response to the Assembly concerning disposition of an Exception of Substance.

2026-02: General 2025 (*BCO* 13-9.b; *BCO* 40-1) — No record of review of records of church Sessions.

2026-03: General 2025 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

2026-04: General 2025 (*BCO* 13-2) — No record of annual report(s) of TE(s) without call.

2026-05: General 2025 (*BCO* 18-6) — Annual reports of candidates not included.

2026-06: General 2025 (*BCO* 18-6) — Annual reports from instructors of candidates in school not included.

2026-07: General 2025 (*BCO* 19-12) — Reports on every intern by the committee charged with the oversight of interns at each stated meeting not included.

2026-08: General 2025 (*BCO* 19-12) — Annual reports of interns not included.

2026-09: General 2025 (*BCO* 19-12) — Annual reports from instructors of interns in school not included.

2026-10: General 2025 (*RAO* 16-4.c.1(3)) — No record of Presbytery's candidates under care, interns, and licentiates.

2026-11: Oct 21, 2024 (*BCO* 21-4.c(1)(a); *RAO* 16-3.e.6) — Incomplete record of examination of a TE transferring into Presbytery.

2026-12: Oct 21, 2024 (*BCO* 13-6) — No record of examination of TE transferring into Presbytery.

2026-13: Oct 21, 2024 (*BCO* 20-1) — No record of call to a definite work.

2026-14: Oct 21, 2024 (*BCO* 13-5) — Presbytery received transfer of a TE without "a definite ecclesiastical work within the bounds of the Presbytery," without explanation of the reasons why this was necessary.

2026-15: Oct 21, 2024 (*BCO* 20-1) — No record of call to a definite work.

2026-16: Apr 21, 2025 (*BCO* 21-5–11; *RAO* 16-3.e.4.) — No record of Presbytery commission report installing a TE.

2026-17: Apr 21, 2025 (*BCO* 5-2.a.iii, b; *BCO* 5-3.c) — Unclear the Presbytery followed procedure for establishing a new mission church.

2026-18: Apr 21, 2025 (*BCO* 21-5 through 11; *RAO* 16-3.e.4.) — No record of Presbytery commission report installing a TE.

d. **That the following responses shall be submitted to the following GA as no responses were received in 2026:**

2021-01: Oct 21, 2019 (*BCO* 13-9, 24-1; *BCO* 24-1) — Examination of RE is not under the purview of the presbytery’s jurisdiction, rather the local session.

Response [2022]: [2022]: Although the minute records the results of the RE tests in the “Report of Examination Committee” on page

10 at the item# 20, the test areas were not recorded. We are very sorry for not recording in detail. But in the future, we will pay more attention for this matter. The RE installation was not administered by the local session.

Rationale [2022]: [2022]: It is unclear how this is a response to the exception. Why was this RE reviewed by Presbytery and the installation not administered by the local Session? [p. 4, Credential Committee]

Response [2023]: [2023] At that time, the church was a mission church which had not her own Session to test a ruling elder. According to Article 13, Section 49 in Presbytery Standing Rules, "Examinations for a ruling elder shall be done by the church's petition", the church requested to do that work on behalf of her. So Presbytery answered to the request.

Rationale [2023]: *BCO* 5-3 provides several forms for temporary government for mission church and a mission church must have a temporary government, and that government must examine ruling elders.

Response [2024]: Meeting Date: Oct 21, 2019; When a mission church installs a RE, the procedure is to be done according to *BCO* 24-1. A RE in the Session of a particular church is to be dispatched to make a temporary Session of the mission church which can do all the RE installation processes.

Rationale [2024]: *BCO* 5-3 list the options for the temporary system of Government for a mission church. 1 RE does not make a session. This temporary government should be appointed by presbytery and remain in place until either presbytery changes members or church is particularized.// *BCO* 5-3 provides several forms for temporary government for mission church and a mission church must have a temporary government, and that government must examine ruling elders.

Response [2025]: From now on, based on *BCO* 5-3 c, Presbytery will make a Comission to serve as a temporary government for Mission Churches to examine Ruling Elders.

Rationale [2025]: Presbytery rules are unclear if commission for examining elder candidates are strictly for examining potential elders of mission churches, or for all churches.

Response [2026]: No Response Received.

2021-02: Oct 19, 2020 (*BCO* 21-6) — No congregation present at ordination/installation service of its pastor. No questions asked of the congregation.

Response [2022]: We ordained not a pastor but an assistant pastor of a local member church at the Presbytery Meeting not at the local church. There was no congregation to give questions. Later, the assistant pastor started to work at that church.

Rationale [2022]: There remains no evidence that congregation or Session was asked the questions of *BCO* 21-6.

Response [2023]: Meeting Date: Oct. 19, 2020; Next time, we will include the part of asking to and answering from the congregation even at the installation of an assistant pastor, too.

Rationale [2023]: No record that presbytery corrected these actions.

Response [2024]: The record of Presbytery's correction decision for including the part of asking to and answering from the congregation at the installation of its pastor is shown in the minute of the 85th Stated Presbytery Meeting (Oct. 16, 2023) 15-1) -(4).

Rationale [2024]: There is no record of correcting the exception, only acknowledgement of the exception.

Response [2026]: No Response Received.

2021-03: Oct 19, 2020 (*BCO* 13-6) — All specific requirements of transfer exams not recorded. Meeting Date: Oct. 19, 2020.

Response [2022]: For the omission of recording the requirements of transfer exams of TE [Name Omitted] and TE [Name Omitted] at the time of their becoming Presbytery members, we will correct the points indicated.

Rationale [2022]: No record that presbytery corrected it records *RAO* 16-10.b.1. Presbytery has not listed the specific requirements and trials for ordination.

Response [2023]: The record of Presbytery's correction decision for including the requirements of transfer exam is shown in the minute of the 85th Stated Presbytery Meeting (Oct. 16, 2023) 15-1)-(5). From now on, Presbytery will list the specific requirements and trials in the minute.

Rationale [2023]: There is no record of correcting the exception, only acknowledgement of the exception.

Response [2026]: No Response Received.

2024-05: Apr 17, 2023 (*BCO* 13-10) — No record of transfer or dismissal of members from dissolving church.

Response [2025]: Because Presbytery did not determine dissolving the church, accordingly no record of transfer or dismissal of members was made.

Rationale [2025]: Presbytery needs to approve the dissolution and verify transfer or dismissal of members.

Response [2026]: No Response Received.

2025-01: General 2024 (*BCO* 34-10) — Presbytery procedures for a TE without call in Standing Rules appears to be contrary to the standards set forth in the *BCO*.

Response [2026]: No Response Received.

2025-02: General 2024 (*BCO* 20-12) — Presbytery Standing Rules appears to categorize missionaries, out-of-bounds TEs as those without call.

Response [2026]: No Response Received.

2025-03: Oct 16, 2023 (*BCO* 23-1) — No record that congregation(/session) was cited to appear before presbytery

Response [2026]: No Response Received.

2025-04: Oct 16, 2023 (*BCO* 16-2; PP 6) — There is no record of the congregation approving of the evangelist being accepted by the church.

Response [2026]: No Response Received.

2025-05: Oct 16, 2023 (*BCO* 18-2, 18-3; *BCO* 19.B) — There is no record of the candidate examination following the *BCO* guidelines.

Response [2026]: No Response Received.

39. That the Minutes of **Korean Southwest Orange County Presbytery:** *(62-1-1)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*RAO* 16-4.c.3) — No responses to Assembly concerning disposition of exceptions of substances.

2026-02: General 2025 (*RAO* 16-10.a) — No record in minutes of exceptions taken by GA.

2026-03: General 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-04: General 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-05: Mar 11, 2025 (*BCO* 21-9; *BCO* 15-1) — No formation of commission for installation into new pastoral relation.

2026-06: Mar 11, 2025 (*BCO* 38-3) — No record that presbytery made determinations required by *BCO* 38-3.

2026-07: Mar 11, 2025 (*BCO* 18-2) — No record of six months membership for candidate.

2026-08: Mar 11, 2025 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of exam for minister seeking admission from another denomination.

2026-09: Mar 11, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-10: Mar 11, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

2026-11: Mar 11, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

2026-12: Mar 11, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

2026-13: Mar 11, 2025 (*BCO* 38-3) — No record that presbytery made determinations required by *BCO* 38-3.

2026-14: Sep 15, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

2026-15: Sep 15, 2025 (*BCO* 13-10) — No record of transfer or dismissal of members upon dissolving a church.

2026-16: Sep 15, 2025 (*BCO* 21-9; 15-1) — No formation of commission for installation into new pastoral relation

2026-17: Dec 22, 2025 (*BCO* 21-9; *BCO* 15-1) — No formation of commission for installation into new pastoral relation

2026-18: Dec 22, 2025 (*BCO* 13-12) — No record of 10-day notice for called meeting.

d. **That the following responses to the 53rd GA be found satisfactory:**

2021-01: Mar 10, 2020 (*BCO* 13-11) — Complaint sent to Presbytery not recorded in minutes. ("full and accurate record" *RAO* 16.3.e.6.)

Response [2022]: This complaint was deemed to be a private manner and it was not dealt with in the presbytery other than noting the complaint. Due to the sensitive nature of this private matter, it would be difficult to redress this issue and include the specifics in the minutes.

Rationale [2022]: The complaint and the response of the Presbytery must be included in the record of the Presbytery (*BCO* 43-3, 6) and submitted for review (*BCO* 40-1).

Response [2023]: We appreciate your diligence in addressing the matter raised in your Exception to our Minutes dated March 10, 2020, concerning the complaint sent to the Presbytery not being recorded. We acknowledge your assertion that both the complaint and the Presbytery's response should be documented in accordance with the Book of Church Order (*BCO*) regulations. However, we maintain that in exceptional cases involving confidential or private matters, discretion must be exercised to uphold the integrity of the process and protect the individuals involved (especially because there is no explicit requirement to print the Complaint in the Minutes in *BCO* 43). Due to the sensitive matter of the complaint, it was assigned to a Commission, which adjudicated it until it reached the final resolution which was recommended to depose the former teaching elder. At the Presbytery meeting of Sept 15, 2020, the resolution was presented in front of the presbytery to receive the Complaint and full report of the commission and accept the committee's recommendations.

Rationale [2023]: The complaint and the response of the Presbytery must be included in the record of the Presbytery (*BCO* 43-3, 6) and submitted for review (*BCO* 40-1) and include the minutes of the commission (*BCO* 15-3). If the complaint was dealt with in executive session by Presbytery, it may be submitted under *RAO* 16-3.e.7 so that RPR will treat it confidentially. Otherwise, the complaint must be submitted through normal channels.

Response [2024]: Presbytery acknowledges the exception and regrets the oversight. The complaints and minutes of the commission

are on file, and the record has been corrected through a motion to Amend Something Previously Adopted, appending the complaints and judicial commission minutes. Moving forward, Presbytery will be more diligent in ensuring this matter is handled properly.

Rationale [2024]: Presbytery needs to also submit the complaint and minutes of the commission for review as instructed by the 51st General Assembly.

Response [2026]: Presbytery acknowledges the exception. Presbytery did not receive a complaint in connection with the matter involving Mr. [Name Omitted] (*BCO* 43-1). Presbytery also did not empower a Commission to act on behalf Presbytery; rather, Presbytery appointed an investigation committee to gather information and report back to Presbytery (*BCO* 15-1). Presbytery received the committee's report and took action at its September 2020 meeting.

2023-02: Mar 15, 2022 (*BCO* 8-7; 13-5; 20-1) — A TE has begun to minister out of bounds. No record that Presbytery followed the appropriate *BCO* provisions to approve that.

Response [2024]: No Response Received.

Response [2025]: We apologize for the clerical mistake of not recording the calls for TEs approved for out-of-bounds ministry. TE [name omitted] received a call from [church name omitted], and TEs requested approval for out-of-bound ministry.

Rationale [2025]: Presbytery must also note that it received assurance that the TE laboring out of bounds will have full freedom to maintain and teach the doctrine of our church and that he will be engaged in preaching and teaching the Word (*BCO* 8-7).

Response [2026]: Presbytery acknowledges a clerical error in failing to record in the minutes the calls of TEs approved for out-of-bounds ministry. In approving the call, Presbytery received assurance that each TE laboring out of bounds would have full liberty to maintain and teach the doctrine of the Presbyterian Church in America and would be engaged in preaching and teaching the Word, in accordance with *BCO* 8-7. The minutes will be amended accordingly.

2023-03: Mar 15, 2022 (*BCO* 15-1; 13-8) — A commission must be appointed by Presbytery, not a committee.

Response [2024]: No Response Received.

Response [2025]: We apologize for the clerical mistake. The correct wording is that the commission was appointed by the presbytery, not a committee or the officers.

Rationale [2025]: Presbytery must also correct its record by remedying the clerical error.

Response [2026]: Presbytery acknowledges a clerical error in the minutes. The body in question was a commission appointed by Presbytery, not merely a committee (*BCO* 15-1). The minutes will be amended to reflect Presbytery's action accurately.

2023-05: Mar 15, 2022; Sep 13, 2022 (*BCO* 18-2, 3) — No record of endorsement by candidates' Sessions, six-months membership for candidates, nor of charge given to candidates.

Response [2024]: No Response Received.

Response [2025]: We apologize for the lack of documentation regarding the endorsements. The candidates had been endorsed by their Sessions, and those endorsements were reviewed by the Candidates and Credentials Committee. We sincerely apologize for this oversight.

Rationale [2025]: Presbytery must also correct its record to show that the candidates met the proper requirements.

Response [2026]: Presbytery acknowledges that the minutes did not sufficiently document the session endorsements were received. Presbytery will amend its records to reflect that the candidates met the applicable requirements according to *BCO* 18-3, 19-10. Presbytery did give the required charge, in accordance with *BCO* 19-10, and that charge is recorded in the minutes as an "address."

2023-08: Mar 15, 2022 (*BCO* 20-1; 8-7; 13-5) — No record of calls to a definite work.

Response [2024]: No Response Received.

Response [2025]: We apologize for our negligence in not properly recording the call. The TE sent a call letter, which was received and evaluated by the Credentials Committee. The call was also reviewed and accepted by the floor. We will ensure that such important details are accurately recorded in the future.

Rationale [2025]: Presbytery has apologized and promises to be more careful in the future, but it must also correct its record to show that the call was received and approved.

Response [2026]: Presbytery acknowledges a clerical error in failing to record the action on the call. The minutes will be amended to reflect that the call was presented to Presbytery through the credential committee and approved. Going forward, Presbytery will take careful attention so that such actions be recorded fully and accurately in the minutes.

2023-11: Mar 15, 2022 (*BCO* 5-9) — Presbytery particularizes mission works with no evidence that all required procedures were followed – specifically no evidence of congregational meeting or petition.

Response [2024]: No Response Received.

Response [2025]: We apologize for the failure to properly record the steps outlined in *BCO* 5-9 for organizing a particular church.

The steps, including receiving the petition (*BCO* 5-9.g), appointing an organizing commission (*BCO* 5-9.h), and setting the date and time for the organizing service (*BCO* 5-9.h), were all completed, but unfortunately, they were not documented correctly. We will ensure that such details are accurately recorded in the future.

Rationale [2025]: Presbytery must also correct its record to show that the required steps in *BCO* 5-9 were in fact completed.

Response [2026]: Presbytery acknowledges a clerical error in the minutes. The action concerning [Church Name Omitted] was not the particularization of a mission church, but the installation of TE [Name Omitted] as pastor of the church, in accordance with *BCO* 20-6. Because no prior installation service had been held for TE [Name Omitted], Presbytery appointed a commission to conduct the installation on Presbytery's behalf (*BCO* 15-1). The minutes will be amended to reflect accurately the nature of the action as an installation and the appointment of the commission

2023-12: Mar. 15, 2022; Sept. 13, 2022 (*BCO* 8-7; 21-2; 23-1) — TEs are reported as resigning from or having left current calls from churches of Presbytery and/or are recorded as taking new calls, but no evidence that Presbytery dissolved pastoral relations, nor acted on the new calls, nor is there evidence that 8-7 and 21-1 were followed for out of bounds calls.

Response [2024]: We apologize for the failure to properly record the steps outlined. The Presbytery received all documentations pertaining to the dissolve of the pastoral relations and the new call.

Rationale [2024]: Presbytery must also correct its record to show that it received all of the required documentation for dissolution of pastoral relations, and followed the steps for approving out-of-bounds calls as specified in *BCO* 8-7.

Response [2026]: Presbytery acknowledges a clerical error in failing to record fully the steps taken. Presbytery received the required documentation pertaining to the dissolution of the pastoral relation and the new call (*BCO* 23-1). Presbytery also followed the provisions governing approval of out-of-bounds calls, receiving the required assurances and approving the call in accordance with *BCO* 8-7. The minutes will be amended to reflect that Presbytery received the required documentation and acted in accordance with *BCO* 23-1 and *BCO* 8-7.

2023-13: Mar 15, 2022 (*BCO* 46-6) — The minutes record that a man has transferred to another Presbytery. No record that congregation concurred with dissolution of pastoral relations, that Presbytery dissolved the pastoral relation, nor that Presbytery voted to release the

TE to a different Presbytery.

Response [2024]: No Response Received.

Response [2025]: We apologize for failing to properly record the concurrences of the Sessions regarding the dissolution of their respective pastoral relations. Although the Sessions of all pastors had concurred with these decisions, the Presbytery neglected to document them accurately including the Presbytery's vote to release the TE to another presbytery. Moving forward, we will be more diligent in ensuring such matters are properly recorded.

Rationale [2025]: Presbytery must also correct its record to show that it received the congregations' concurrence for dissolving the pastoral relations, that the Presbytery dissolved the relationships, and that it approved the TEs transfers to different Presbyteries.

Response [2026]: Presbytery acknowledges a clerical error in failing to record the concurrences correctly. Presbytery received the required concurrence for the dissolution of the pastoral relations and, upon that concurrence, dissolved the respective pastoral relations (*BCO* 23-1). Presbytery also acted on the related transfers to other Presbyteries (*BCO* 20-9; 46-6). The minutes will be amended to reflect (1) receipt of the required concurrence, (2) Presbytery's action dissolving the pastoral relations, and (3) Presbytery's action on the transfers (*BCO* 40-2). Going forward, Presbytery directs that these actions be recorded fully and accurately in the minutes (*BCO* 40-2).

2023-17: Sep 13, 2022 (*BCO* 20-1) — No record of call to a definite work.

Response [2024]: No Response Received.

Response [2025]: We apologize for the oversight in not properly recording the call. The TE sent a call letter, which was received and evaluated by the Credentials Committee. The call was then presented to the floor, where it was acknowledged and accepted.

Rationale [2025]: Presbytery must also correct its record and show that it received and approved the call.

Response [2026]: Presbytery acknowledges that the minutes of September 13, 2022 failed to reflect the required action approving a call to a definite work. In keeping with *BCO* 20-1 (requirement of a call to a definite work), the Presbytery notes that the call letters were received for the candidates, reviewed by the Credentials Committee, and reported to the Presbytery for action.

2023-18: Sep 13, 2022 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam. Men are approved for ordination but no evidence of education requirements, required papers, or original languages.

Response [2024]: No Response Received.

Response [2025]: We apologize for the oversight in not properly documenting the candidate's examination in all required areas. The candidate was examined in committee on all aspects, including the items mentioned above, and was subject to open examination. At KSWOC's March 11, 2025 meeting, the March 14, 2023 minutes were corrected by appending the commission minutes through a motion to "Amend Something Previously Adopted."

Rationale [2025]: The response indicates a correction to the record for a different meeting (March 2023) than the one that was originally cited for the exception (September 2022).

Response [2026]: The transfer candidate was examined according to (*BCO* 21-4). In addition, Presbytery, through its examination committee, required the candidate to submit an exegetical paper on an assigned portion of Scripture, with required use of the original languages, as part of the candidate's examination in the areas of Bible and theology (*BCO* 21-4). This requirement and the committee's action were not recorded accurately in the minutes; the minutes will be amended to reflect Presbytery's action.

2023-19: Sep 13, 2022 (*BCO* 13-6) — No record of written credentials of dismissing Presbytery (not specified) for TE transfer.

Response [2024]: No Response Received.

Response [2025]: We apologize for the oversight in not properly documenting the written credentials of the dismissing Presbytery. We can assure you all documents were properly received.

Rationale [2025]: Presbytery must also correct its record and note that the written credentials of the dismissing Presbytery were received.

Response [2026]: Presbytery acknowledges a clerical omission in the minutes in that the minutes did not explicitly record receipt of the written credentials in connection with this TE transfer, in accordance with *BCO* 13-6. The written credentials and dismissals were in fact received and reviewed. Presbytery will correct its record in its minutes.

2023-20: Sep 13, 2022 (*BCO* 19-2; *RAO* 16-3.e.5) — All specific requirements of three licensure exams not recorded. Further, those seeking licensure are not required to be examined in sacraments and church history.

Response [2024]: No Response Received.

Response [2025]: We apologize for the oversight in not properly documenting the candidate's examination. The candidate was thoroughly examined in committee on all areas, including the items mentioned above, and was subject to examination. At

KSWOC's March 11, 2025 meeting, the March 14, 2023 minutes were corrected by appending the commission minutes through a motion to "Amend Something Previously Adopted."

Rationale [2025]: Presbytery should correct its record to show that the candidate was examined in all of the required areas. Also, part of the response indicates a correction of the record for a different meeting (March 2023) than the one that was originally cited for the exception (September 2022).

Response [2026]: The Presbytery acknowledges for the oversight in not properly documenting the candidates' examination for licensure. Presbytery will correct its record to show that the candidate was examined in three areas of Bible, Systematic Theology, and Church History. The Presbytery recognizes its error in the way the licensure exam was conducted and apologizes for the error. We have, since, updated the way we conduct licensure examinations to be in line with *BCO* 19-2.

2023-22: Sep 12, 2022 (*BCO* 46-6) — The minutes record that 2 TEs have been removed from the roll because they joined another PCA Presbytery. No record that congregations concurred with dissolution of pastoral relations, that Presbytery dissolved the pastoral relations, nor that Presbytery voted to release the TEs to the different Presbyteries.

Response [2024]: No Response Received.

Response [2025]: We apologize for not clearly stating in the minutes that the Stated Clerk had received the necessary confirmation of approval from the other presbyteries regarding the release transfers of TEs [names omitted]. Going forward, we will ensure that the Stated Clerk's report includes the confirmation of appropriate actions taken by other presbyteries, and that this is properly documented in future minutes.

Rationale [2025]: Presbytery should also correct its record to show that they received concurrence from the congregations of the TEs resignations, that Presbytery dissolved the pastoral relations, and that it approved their transfer to different Presbyteries.

Response [2026]: Presbytery acknowledges a clerical error in the minutes in failing to record the granting of letters of dismissal/transfer for the two TEs who were removed from our roll upon their reception by another presbytery, as required for transfers between presbyteries (*BCO* 13-6). Because these TEs were laboring out of bounds and did not dissolve any existing pastoral relation within this Presbytery, the action needed was dismissal/transfer rather than dissolution of pastoral relations. Presbytery will correct its records to reflect that the dismissals were duly granted and recorded.

2023-23: Sep 13, 2022 (*PP* 6; *BCO* 3-1; 16-2) — Presbytery appoints an

interim pastor with no evidence of congregational request or concurrence.

Response [2024]: No Response Received.

Response [2025]: We apologize for the lack of information in the minutes. The order was that the congregation requested an interim pastor, and the presbytery properly responded. We will ensure that this process is more clearly documented in the future.

Rationale [2025]: Presbytery must also correct its record by noting that it received the request from the church for the stated supply relationship. Furthermore, the request should be made specifically by the church's Session per *BCO* 22-6.

Response [2026]: Presbytery acknowledges that the minutes did not record the congregation's request for the "interim/stated supply" arrangement. The Presbytery erred in that the church did not request an interim pastor, but the retiring TE petitioned for an interim pastor. We apologize for not following the protocols outlined in the *BCO* (*PP* 6; *BCO* 3-1; 16-2; 22-5; 22-6). We will take care to follow the *BCO* in this matter.

2024-03: Mar 14, 2023 (*BCO* 23-1) — No record that Congregation or Session concurred with the dissolution of pastoral relations.

Response [2025]: We apologize for this clerical oversight. The Sessions of all pastors concurred in the dissolution of their respective pastoral relations; however, the Presbytery erred in not properly recording those concurrences. We will take greater care in the future to ensure such matters are accurately documented.

Rationale [2025]: Presbytery should also correct its record by noting that it received concurrence from the Sessions for the dissolution of the pastoral relationship.

Response [2026]: Presbytery acknowledges a clerical oversight in the minutes in failing to record that the dissolution of pastoral relations proceeded with the required concurrence of the congregation and session according to *BCO* 23-1.

Presbytery will amend the minutes to reflect the Session's request and the congregation's concurrence, and to document Presbytery's action in accepting the dissolution in accord with the *BCO*. Presbytery will take greater care to record its actions more accurately in its minutes.

2024-11: Mar 14, 2023 (*BCO* 18-2) — No record of endorsement by candidate's Session.

Response [2025]: We apologize for this clerical mistake. Our candidates had been endorsed by their Sessions, and those endorsements were reviewed by the Credentials Committee.

Rationale [2025]: Presbytery must also correct its record and note that

it received endorsement for the candidates from their Sessions.

Response [2026]: Presbytery acknowledges a clerical omission in the minutes regarding the candidate's Session endorsement. The candidate was, in fact, endorsed by his Session, and that endorsement was received by the presbytery's Credentials Committee in keeping with the requirements for a candidate coming under care. Presbytery will correct its records to reflect receipt of the Session's endorsement and will ensure that future minutes are recorded accurately.

2025-01: Mar 12, 2024 (*BCO* 13-10) — No record that Presbytery gave at least 60 days notice of decision to dissolve a church.

Response [2026]: Presbytery took action to dissolve [Church Name Omitted]. Presbytery concurs that it did not provide the required 60 days notice of decision to dissolve a church according to *BCO* 13-10. Due to extraordinary circumstances—namely, that the only members of the church were the immediate family of TE [Name Omitted]—Presbytery did not provide the full 60-day notice. Presbytery recognizes this as an error in light of *BCO* 13-10 and will make sure that future dissolutions will follow the procedures required by the *BCO* 13-10.

2025-02: Mar 12, 2024 (*PP* II.3; *BCO* 13-10) — No record of transfer or dismissal of members upon dissolving a church.

Response [2026]: Presbytery did not transfer or dismiss any members of [Church Name Omitted] in Greater Phoenix. Presbytery concurs that ordinarily, when a church is dissolved, the Presbytery is to take order of the congregation and to follow the procedures outlined in *BCO* 13-10. In this case, due to extraordinary circumstances — namely, that the only members of the congregation were the immediate family to TE [Name Omitted], Presbytery did not process any transfers or dismissals. Presbytery acknowledges its error and omission in light of *BCO* 13-10 and will take care of properly dissolving a church in future cases, including transfers or dismissals as appropriate.

2025-03: Mar 12, 2024 (*BCO* 23-1) — No record that Presbytery properly dissolved the pastoral relation of a TE.

Response [2026]: The Presbytery concurs that the ordinary procedure involves citing the church to appear by its commissioners when a minister tenders his resignation (*BCO* 23-1). Due to extraordinary circumstances — namely that the only members of the congregation were the immediate family of the minister — Presbytery did not issue a citation. Presbytery recognizes that this was a departure from the procedure in *BCO* 23-1 and understands that the required citation needs to be issued in cases of dissolution of pastoral relations. We recognize our error and

promise to be more careful in the future.

2025-04: Mar 12, 2024 (*BCO* 20-1; *RAO* 16-3.e.7) — Specific arrangements of call not shown to be approved.

Response [2026]: Call letters are processed through the Credentials Committee of our Presbytery as an administrative matter (Standing Rule 3-7.1). The committee examines the call arrangements and reports its recommendation to Presbytery. Accordingly, the Credentials Committee reviewed the specific call arrangements for TE [Name Omitted] and recommended that Presbytery approve them. Presbytery adopted the committee's recommendation and approved his ministry at [Church Name Omitted]. This action was not recorded accurately in the minutes; the minutes have been corrected to reflect Presbytery's action.

2025-11: Mar 12, 2024 (*BCO* 13-6; *BCO* 21-4.c) — Incomplete record of examination of TE transferring into Presbytery.

Response [2026]: The transfer candidate was examined on PCA History (*BCO* 21-4). In addition, Presbytery, through its examining committee, required the candidate to submit an exegetical paper on an assigned portion of Scripture, with required use of the original languages, as part of the candidate's examination in the areas of Bible and theology (*BCO* 21-4). This requirement and the committee's action were not recorded accurately in the minutes; the minutes will be amended to reflect Presbytery's action.

2025-12: Sep 10, 2024 (*BCO* 7-3; *BCO* 8-1) — Presbytery has yet to take sufficient action on a report of an important delinquency of one of its member churches which apparently permitted "an ordained woman to be on staff." The woman is listed on the church's website with the title of "pastor" (목사).

Response [2026]: Presbytery did not initiate a judicial process with respect to TE [Name Omitted] or [Church Name Omitted] regarding this issue. Presbytery officers met with TE [Name Omitted] and representatives of [Church Name Omitted] to clarify concerns regarding the church's use of the title "pastor" for an ordained woman on staff. The officers reported to Presbytery, and Presbytery received the report and awaited TE [Name Omitted]'s response. Before further action was taken, TE [Name Omitted] and [Church Name Omitted] withdrew from the Presbytery while in good standing, which the Presbytery approved at its 22nd Stated meeting on March 11, 2025. Presbytery approved the candidate's stated difference with *WCF* 21.8, but did not follow the required procedure for judging the nature of the difference—whether it is merely semantic, more-than-semantic but not out of accord, or out of

accord—before acting (*RAO* 16-3.e.(5)). Presbytery recognizes this oversight and directs that, in future examinations, it will explicitly record both (1) the candidate's stated difference and (2) Presbytery's determination of its nature in accordance with *RAO* 16-3.e.(5) (*BCO* 21- 4).

2025-13: Sep 10, 2024 (*BCO* 5-9.g-h) — Presbytery appears to have particularized a mission church without receiving and approving a petition from its members.

Response [2026]: [Church Name Omitted] was received into Korean Southwest Orange County Presbytery at the March 2024 stated meeting of Presbytery as an organized church, with a duly constituted Session, in accordance with the provisions for receiving an organized church (*BCO* 13-8). The minutes have been amended to record this action accurately.

2025-14: Sep 10, 2024 (*PP* II.6; *BCO* 12-5.b; 24-1) — Presbytery overstepped its constitutional authority in approving a church's request to increase Ruling Elders. The number of Ruling Elders is to be determined by the church's members, not the Presbytery (*BCO* 24-1).

Response [2026]: Presbytery acknowledges that it exceeded its constitutional authority by approving requests to increase the number of ruling elders. The Presbytery concurs that the election of ruling elders belong to the congregation according to *BCO* 24-1. In this case, the Session of the church examined its elder candidates and proceeded to ordain and installed them in accordance with *BCO* 12-5.b; 24-1; 24-4. The Presbytery's action of "approving" the increase was an error on the Presbytery's part. Presbytery acknowledges that going forward, it will refrain from taking action in areas reserved to the Session and congregation, and will act only within its constitutional oversight.

2025-15: Sep 10, 2024 (*BCO* 20-1) — No record of the reasons why Presbytery considers an out-of-bounds work to be a valid Christian ministry.

Response [2026]: Presbytery considered TE [Name Omitted]'s request to engage in out-of-bounds work and examined whether the proposed work is a valid Christian ministry consistent with the doctrine of the Presbyterian Church in America (*BCO* 8-4). TE [Name Omitted] presented the nature of the work and affirmed its accord with the doctrine and polity of the PCA, and Presbytery approved the out-of-bounds work (*BCO* 20-1). The minutes did not sufficiently record Presbytery's rationale for approving the request; the minutes will be amended to reflect Presbytery's examination and grounds for approval.

2025-18: Sep 10, 2024 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of exam for minister seeking admission from another denomination.

Response [2026]: The transfer candidate was examined on all areas in accordance to *BCO* 21-4, including PCA History. In addition, Presbytery, through its examination committee, required the candidate to submit an exegetical paper on an assigned portion of Scripture, including required use of the original languages, as part of the candidate's examination in the areas of Bible and theology (*BCO* 21-4). This requirement was not recorded accurately in the minutes; the minutes will be amended to reflect Presbytery's action.

2025-19: Oct 31, 2024 (*BCO* 13-12) — Notice for called meeting not in order (10-day notice with purpose of meeting clearly stated).

Response [2026]: Presbytery acknowledges the error in its notice for the called meeting. Notice was issued on October 23, 2024, and the called meeting was held on October 31, 2024. The stated purposes of the meeting were to receive the resignation of the Stated Clerk and to nominate and elect a new Stated Clerk. Presbytery recognizes that the notice provided did not conform to the requirements for calling and noticing meetings and directs that, going forward, all called meetings will be noticed in accordance with *BCO* 13-12.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2023-09: Mar 15, 2022 (*BCO* 19-2.d, e, f) — No sermon and no statement of differences with the Standards for one being licensed.

Response [2024]: No Response Received.

Response [2025]: We apologize for our negligence in failing to record his own words in the minutes. We will be more attentive and diligent in ensuring that such details are accurately documented in the future.

Rationale [2025]: Presbytery must also correct its record and document whether the candidate preached a sermon as required and also note the candidate's exception(s) in his own words, along with the Presbytery's judgment of the stated difference(s).

Response [2026]: Presbytery acknowledges a clerical error in failing to record fully the licensure examination. The candidate preached a sermon before Presbytery as part of the licensure examination, and Presbytery also received and approved the candidate's stated differences with the Westminster Standards (*BCO* 19-2). However, Presbytery did not follow the required procedure of determining and recording the nature of the stated difference—whether merely semantic, more-than-semantic but not out of accord, or out of accord—before approving it (*RAO* 16-3.e.5). Presbytery recognizes this oversight and directs that future examinations will explicitly include and record this

determination in accordance with *RAO* 16-3.e.5. The minutes will be amended to reflect the sermon, the stated difference, and Presbytery's granting of exception.

Rationale [2026]: Presbytery must also correct its record and record how it judged the candidate's stated differences (*RAO* 16-3.e.6)]

2023-10: Mar 15, 2022 (*BCO* 21-4) — No evidence of educational requirements, required papers, or sermon for one being ordained; and no evidence the man was asked to state differences with the Standards.

Response [2024]: No Response Received.

Response [2025]: We apologize for our oversight in not recording his own words in the minutes. We will be more diligent and attentive in the future to ensure such details are properly documented.

Rationale [2025]: Presbytery must also correct its record and note whether the candidate preached a sermon. Presbytery must also document the candidate's exception(s) in his own words, along with the Presbytery's judgment of the stated difference(s).

Response [2026]: Presbytery acknowledges a clerical error in failing to record fully the candidate's educational and the particulars of his examination for ordination. The candidate submitted his educational credentials and required papers, and Presbytery examined him in the areas required for ordination (*BCO* 21-4). Presbytery also received the candidate's stated differences with the Westminster Standards and approved them. However, Presbytery did not follow the required procedure of determining and recording the nature of the stated difference before\ approving it according to *RAO* 16-3.e.5. In future examinations, the Presbytery will explicitly make and record this determination in accordance with *RAO* 16-3.e.5. The minutes will be amended to reflect the details of the candidate's examination and approval of the exception.

Rationale [2026]: Presbytery must also correct it record and record how it judged the candidate's stated differences (*RAO* 16-3e.6).

2023-15: Sep 13, 2022 (*BCO* 21-4; *RAO* 16-3.e.5) — Stated difference not recorded in the candidate's own words.

Response [2024]: No Response Received.

Response [2025]: We apologize for the oversight in not recording his words in the minutes. We will be more diligent and attentive in the future to ensure such details are accurately documented.

Rationale [2025]: Presbytery must also correct its record and record the candidate's exception(s) in his own words, along with the Presbytery's judgment of the stated difference(s).

Response [2026]: Presbytery approved the candidate's stated difference with *WCF* 21.8, but did not follow the required

procedure for judging the nature of the difference—whether it is merely semantic, more-than-semantic but not out of accord, or out of accord—before acting (*RAO* 16-3.e.5). Presbytery recognizes this oversight and directs that, in future examinations, it will explicitly record both (1) the candidate's stated difference and (2) Presbytery's determination of its nature in accordance with *RAO* 16-3.e.5 (*BCO* 21-4).

Rationale [2026]: Presbytery must also correct its record and record the candidate's exception(s) in his own words, along with the Presbytery's judgment of the stated difference(s).

2023-16: Sep 13, 2022 (*BCO* 21-4; *RAO* 16-3.e.5) — Stated differences not judged with the prescribed categories.

Response [2024]: No Response Received.

Response [2025]: We apologize for failing to capture his words in the minutes. Moving forward, we will make sure to carefully document all relevant details to prevent such oversights.

Rationale [2025]: Presbytery must also correct its record and show how it judged the candidate's stated differences according to the prescribed categories (*RAO* 16-3.e.6).

Response [2026]: Presbytery approved the candidate's stated difference with *WCF* 21.8, but did not follow the required procedure for judging the nature of the difference—whether it is merely semantic, more-than-semantic but not out of accord, or out of accord—before acting (*RAO* 16-3.e.5). Presbytery recognizes this oversight and directs that, in future examinations, it will explicitly record both (1) the candidate's stated difference and (2) Presbytery's determination of its nature in accordance with *RAO* 16-3.e.5 (*BCO* 21- 4).

Rationale [2026]: Presbytery must also correct its record and show how it judged the candidate's stated differences according to the prescribed categories (*RAO* 16-3.e.6).

2024-01: General 2023 (*BCO* 8-10) — A member of the court in good standing cannot be prevented from serving on a presbytery committee.

Response [2025]: We apologize for this clerical mistake. TE [name omitted] has been a member in good standing and was not prevented from serving on our committee.

Rationale [2025]: Presbytery must also correct its actions by amending its Standing Rules to bring them into conformity with the *BCO*.

Response [2026]: Presbytery acknowledges that its Standing Rules, as previously written, improperly restricted committee service in a way inconsistent with the constitutional parity and eligibility of elders in (*BCO* 8-10). At its September 2025 stated meeting, Presbytery corrected this by amending its Standing Rules to bring them into conformity with the *BCO*, so that any member of Presbytery in good standing may be appointed to and serve

on Presbytery committees.

Rationale [2026]: The latest standing rules still prevent ministers with less than 10 years membership from serving on the shepherding committee.

2024-05: Mar 14, 2023 (*BCO* 21-4; *RAO* 16-3.e.5) — Stated differences not recorded in the candidate's own words.

Response [2025]: We apologize for our negligence in failing to record his own words in the minutes. We will be more attentive and ensure such records are accurately documented in the future.

Rationale [2025]: Presbytery must also correct its record and show how it judged the candidate's stated differences (*RAO* 16-3e.6).

Response [2026]: We apologize for the failure to capture the candidate's stated differences in his own words in the minutes. Moving forward, we will make sure to carefully document all relevant details to prevent such oversight. Presbytery approved candidate's differences to *WCF* 21.8, but did not follow procedure in judging the nature of the stated difference (*RAO* 16-3.e.5). We apologize for the oversight, and will be careful to correct in the future.

Rationale [2026]: Presbytery must also correct its record and record the candidate's exception(s) in his own words, along with the Presbytery's judgment of the stated difference(s).

2024-07: General 2023 (*BCO* 21-4; *RAO* 16-3.e.5) — Stated differences not judged with the prescribed categories.

Response [2025]: We apologize for our oversight in not recording his exact words in the minutes. Moving forward, we will be more diligent in ensuring that such records are accurately documented.

Rationale [2025]: Presbytery must also correct it record and record how it judged the candidate's stated differences (*RAO* 16-3.e.6)

Response [2026]: Presbytery approved the candidate's stated difference with *WCF* 21.8, but did not follow the required procedure for judging the nature of the difference—whether it is merely semantic, more-than-semantic but not out of accord, or out of accord—before acting (*RAO* 16-3.e.5). Presbytery recognizes this oversight and directs that, in future examinations, it will explicitly record both (1) the candidate's stated difference and (2) Presbytery's determination of its nature in accordance with *RAO* 16-3.e.5 (*BCO* 21- 4).

Rationale [2026]: Presbytery must also correct its record and record how it judged the candidate's stated differences (*RAO* 16-3.e.6).

2024-08: Sep 12, 2023 (SR Article 13.1) — Presbytery allowed officers to appoint members of a commission.

Response [2025]: We apologize for the clerical mistake. The correct wording is that the presbytery appointed the officers as

members of the commission.

Rationale [2025]: Presbytery must also correct its record by remedying the clerical error.

Response [2026]: Presbytery acknowledges an error in procedure in permitting its officers to appoint the members of a Presbytery commission. Presbytery will correct its practice by ensuring that the appointment any commission is appointed by Presbytery. Presbytery will also review Standing Rule 13 to ensure it conforms to and does not duplicate or conflict with the *BCO* 15-2.

Rationale [2026]: Presbytery must ratify its actions and/ or correct its records.

2025-09: Mar 12, 2024 (*BCO* 46-6) — Presbytery approved withdrawal of a TE to another denomination without recording its determination required by *BCO* 38-3.

Response [2026]: TE [Name Omitted] withdrew his membership from the Presbytery as a minister in good standing, in accordance with *BCO* 38-3a. He did so with the stated intent to affiliate with another branch of the visible Church (*BCO* 2-2).

Rationale [2026]: Presbytery failed to correct its record.

2025-10: Mar 12, 2024 (*BCO* 21-4.g; *RAO* 16-3.e.5) — Stated differences not judged with the prescribed categories.

Response [2026]: Presbytery approved the candidate's stated difference with *WCF* 21.8, but did not follow the required procedure for judging the nature of the difference—whether it is merely semantic, more-than-semantic but not out of accord, or out of accord—before acting (*RAO* 16-3.e.5). Presbytery recognizes this oversight and directs that, in future examinations, it will explicitly record both (1) the candidate's stated difference and (2) Presbytery's determination of its nature in accordance with *RAO* 16-3.e.5 (*BCO* 21- 4).

Rationale [2026]: Presbytery must also correct its record and record how it judged the candidate's stated differences (*RAO* 16-3.e.6).

2025-16: Sep 10, 2024 (*BCO* PP 5; *BCO* 19-2.e-f) — No record that Presbytery judged the stated differences of licensure candidates during their examination.

Response [2026]: Presbytery approved the candidate's stated difference with *WCF* 21.8, but did not follow the required procedure for judging the nature of the difference—whether it is merely semantic, more-than-semantic but not out of accord, or out of accord—before acting (*RAO* 16-3.e.5). Presbytery recognizes this oversight and directs that, in future examinations, it will explicitly record both (1) the candidate's stated difference and (2) Presbytery's determination of its nature in accordance with *RAO* 16-3.e.5 (*BCO* 21- 4).

Rationale [2026]: Although Presbytery has recognized the oversight and directed explicit record in future exams, it has not, as of yet, begun to do so.

2025-17: Sep 10, 2024 (*BCO* 21-4; *RAO* 16-3-e.6) — Stated difference not judged with the prescribed categories.

Response [2026]: Presbytery approved the candidate's stated difference with *WCF* 21.8, but did not follow the required procedure for judging the nature of the difference—whether it is merely semantic, more-than-semantic but not out of accord, or out of accord—before acting (*RAO* 16-3.e.5). Presbytery recognizes this oversight and directs that, in future examinations, it will explicitly record both (1) the candidate's stated difference and (2) Presbytery's determination of its nature in accordance with *RAO* 16-3.e.5 (*BCO* 21- 4).

Rationale [2026]: Presbytery must also correct its record and record how it judged the candidate's stated differences (*RAO* 16-3.e.6).

f. **That the following responses shall be submitted to the following GA as no responses were received in 2026:**

2025-05: Mar 12, 2024 (*BCO* 5-2.b; *BCO* 13-8) — Presbytery apparently received organized churches without sessions and without providing rationale.

Response [2026]: No Response Received.

2025-06: Mar 12, 2024 (*BCO* 5-2.b; *BCO* 13-8) — Presbytery apparently received organized churches without sessions and without providing rationale.

Response [2026]: No Response Received.

2025-07: Mar 12, 2024 (*BCO* PP 6; *BCO* 12-5.b; 24-1) — Presbytery overstepped its constitutional authority in approving a church's request to increase Ruling Elders. The number of Ruling Elders is to be determined by the church's members, not the Presbytery (*BCO* 24-1).

Response [2026]: No Response Received.

2025-08: Mar 12, 2024 (*BCO* 5-2.b; *BCO* 13-8) — Presbytery apparently received organized churches without sessions and without providing rationale.

Response [2026]: No Response Received.

g. **That the General Assembly:**

Cite Korean Southwest Orange County Presbytery to appear by its representative before the Committee on Review of Presbytery Records at its 2027 meeting (date to be determined by the Administrative Committee) with responses to the 53rd General Assembly. If the Presbytery desires, the Presbytery may appoint its representative to also act as its representative to serve on the RPR committee.

40. That the Minutes of **Korean Southwest Presbytery:** *(64-0-0)*

a. Be approved without exception: **Mar 11, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*RAO* 16-4.c.1) — Directories of churches, committees, officers, interns and licentiates not included.

2026-02: Sep 16, 2025 (*BCO* 20-1) — No record of definite call for three men.

d. **That the following responses to the 53rd GA be found satisfactory:**

2022-03: Jan 19, 2021 (*BCO* 20-1) — No record of call to a definite work.

Response [2023]: In presbytery meeting docket, all the records are included. But, in the meeting minutes, it is not included. We will try to include from now on.

Rationale [2023]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted the record(s) for review.

Response [2024]: Until now, KSWP approved the call of all candidates without asking for the terms of the call or for the assurance that he will have freedom to preach the Gospel. Our committees viewed the details. However, the details were not presented before the floor of the Presbytery for explicit approval. We understand now that approval of call includes terms of call plus assurance of freedom to preach the Gospel. We began explicitly asking for and approving such things beginning this presbytery. We will do this in the future.

Rationale [2024]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

Response [2026]: Presbytery apologizes for the error. Although the call was not prosecuted at this particular presbytery, our presbytery prosecuted the candidate's call at a later presbytery (83rd) and found the terms acceptable. It is recorded in the minutes of the 83rd presbytery. We have also amended the minutes of the January 19, 2021 to reflect the change. We promise to be more careful in the future.

2023-10: Mar 15, 2022; Sep 13, 2022 (*BCO* 21-4) — No record of call to a definite work.

Response [2024]: All the documents were submitted to presbytery, included in dockets. But we have erred to include records in meeting minutes.

Rationale [2024]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted the record for review.

Response [2025]: Until now, KSWP approved the call of all candidates without asking for the terms of the call or for the assurance that he will have freedom to preach the Gospel. Our committees viewed the details. However, the details were not presented before the floor of the Presbytery for explicit approval. We understand now that approval of call includes terms of call plus assurance of freedom to preach the Gospel. We began explicitly

asking for and approving such things beginning this presbytery. We will do this in the future.

Rationale [2025]: The response does not address the matter of a call to a definite work. [HOWEVER, the presbytery was likely confused by the incorrect *BCO* reference citation provided. Instead of *BCO* 21-4, it should have been *BCO* 20-1.

Response [2026]: Presbytery apologizes for the error. At both of these presbytery meetings, the credentials committee had received the calls from the candidates' churches. When the committee recommended the reception of the candidate (whether for transfer or ordination, etc.), it was implied that the Presbytery would also be approving the call. This was an error made in 2022 and our presbytery has since learned that this was improper procedure, and we have corrected our procedure/policy since then. Nevertheless, the Presbytery has now formally approved the call of every candidate in the above stated presbytery meetings, and the minutes have now been amended to reflect an explicit statement that their calls are approved by presbytery. We have already begun to be more careful now about prosecuting calls explicitly, and we will

2025-01: Mar 12, 2024 (*BCO* 8-4, 8-6) — No record that TE is commissioned to work as an evangelist in a foreign country.

Response [2026]: It appears that there was an error in the translation of our minutes from Korean to English. Korean Southwest Presbytery did not commission anyone to work as an evangelist in a foreign country. Under our presbytery's overseas missions committee (MTW), the minutes record that our presbytery approved a request for financial support of $2000. This financial support was for an existing member of our presbytery who had planned a short-term missions trip to India. He was not commissioned as an evangelist. Our presbytery apologizes for its translation error, and we promise to be more careful in the future.

2025-02: Mar 12, 2024 (*BCO* 13-2) — No record of approval to labor our of bounds or that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach doctrine of our Church.

Response [2026]: We apologize for the error. Based on committee reports and Presbytery approval, our Presbytery approved the out-of-bounds labor with the assurance that the TE would have full freedom to maintain and teach the doctrine of our Church. However, we erred in failing to record the statement of assurance explicitly. We promise to be more careful in the future. The minutes have now been amended to reflect this change.

2025-03: Mar 12, 2024 (*BCO* 25-11) — No record of congregational vote to

withdraw from presbytery.

Response [2026]: We apologize for the error. At the time of withdrawal from the Presbytery, the church had no communing members. Therefore, a congregational vote was not held. Presbytery was informed, and it was MSC to approve the formal withdrawal from the Presbytery. We have amended the Presbytery minutes to record this. We promise to be more careful in the future.

2025-04: Mar 12, 2024 (*BCO* 13-2) — No record of approval of TE laboring out of bounds.

Response [2026]: We apologize for the error. Based on committee reports and Presbytery approval, our Presbytery approved the out-of-bounds labor with the assurance that the TE would have full freedom to maintain and teach the doctrine of our Church. However, we erred in failing to record the statement of assurance explicitly. We promise to be more careful in the future. The minutes have now been amended to reflect this change.

2025-05: Mar 12, 2024 (*BCO* 13-9) — Under credentials committee report, no record of acting on recommenations to: 1) approval of dissolution of church; 2) change call of TE; and 3) TE request to withdraw from Presbyery.

Response [2026]: We apologize for the error. Presbytery approved the committee recommendations to dissolve the church in question, to change the call of the TE in question, and to approve the TE request to withdraw from Presbytery. Presbytery failed to record explicitly that it was MSC to approve all three credential committee recommendations. The minutes have now been amended accordingly. We will be more careful in the future.

2025-06: Mar 12, 2024 (*BCO* 19:2.f) — No record of licensing candidates requiring statement of differences with confessional standards.

Response [2026]: We apologize for the error. Both candidates declared no stated differences with the confessional standards. The minutes have been amended accordingly. We promise to be more careful in the future.

2025-07: Mar 12, 2024 (*BCO* 19-3, 4) — No record that licensure candidates were propounded the questions for licensure nor offered received a prayer "suitable for the occasion."

Response [2026]: We apologize for the error. The questions for licensure were propounded and prayer “suitable for the occasion” was offered during the Presbytery meeting. Presbytery failed to record those acts explicitly. The minutes have been amended accordingly. We promise to be more careful in the future.

2025-08: Mar 12, 2024 (*BCO* 13-2) — No record of approval to labor out of

bounds or that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach doctrine of our Church.

Response [2026]: We apologize for the error. Based on committee reports and Presbytery approval, our Presbytery approved the out-of-bounds labor with the assurance that the TE would have full freedom to maintain and teach the doctrine of our Church. However, we erred in failing to record the statement of assurance explicitly. We promise to be more careful in the future. The minutes have now been amended to reflect this change.

2025-09: Mar 12, 2024 (*BCO* 20-9, 10; 38-2; 30-5) — TE removed from the membership of Presbytery apart from methods set forth in the *BCO*.

Response [2026]: We apologize for the error. At the time of the TE's request for removal of membership, in accordance with *BCO* 38-2, Presbytery found the TE in question to be in good standing (i.e., no charges or censures), and was satisfied with the evidence he presented of his inability to serve the Church. Therefore, at the stated meeting, Presbytery approved his divestiture of office without censure. The minutes have been amended to record these acts explicitly. We promise to be more careful in the future.

2025-10: Mar 12, 2024 (*BCO* 8-7) — It is unclear if presbytery approved TE to labor out of bounds.

Response [2026]: At this particular stated meeting, every request to labor out of bounds was approved by Presbytery, and the minutes have now been appropriately amended. Please see the responses above.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2024-01: General 2023 (*BCO* 20-1) — Teaching elders are received into Presbytery with no evidence of a call to a definite work (*BCO* 20-1, paragraph 1). For each man received into Presbytery in 2023, Presbytery must now formally approve their call and record that call in the minutes.

Response [2025]: Until now, KSWP approved the call of all candidates without asking for the terms of the call or for the assurance that he will have the freedom to preach the Gospel. Our committees viewed the details. However, the details were not presented before the floor of the Presbytery for explicit approval. We understand now that approval of call includes terms of call plus assurance of freedom to preach the Gospel. We began explicitly asking for and approving such things beginning this presbytery. We will do this in the future.

Note: The committees did not typically view details regarding the actual pay. It viewed details regarding the type of labor to

which a candidate was called. Committee then recommended Presbytery to approve the call, which it did. However, once again, Presbytery now understands that it erred in not explicitly asking for terms of call and also assurance of freedom to preach the Gospel.

Rationale [2025]: No evidence that Presbytery followed directive for "each man received into Presbytery in 2023.

Response [2026]: We apologize for the error. This reflects a long standing procedural error in our presbytery, and it was not until the fall of 2024 that our presbytery has since learned that this was improper procedure. Since that time, however, we have corrected our practice. Nevertheless, presbytery has now formally approved the call of every man received into the presbytery in 2023, and the minutes have now been amended to reflect the change

Rationale [2026]: No record submitted of the calls approved by Presbytery, or list of the men called whose records were not submitted.

2024-05: General 2023 — Article 22 of the By-Laws contains an unconstitutional provision. Presbytery may not mandate ordination after one year of licensure. The requirements of *BCO* 20 and 21 must be met.

Response [2025]: Presbytery apologizes for the error. Although presbytery has not formally approved this amendment, a proposed amendment shall be as followed: "Ordination shall be administered to candidates who have completed a minimum of a one-year internship." This amendment proposal will be brought before Presbytery at its next stated meeting (84th) in September 2025.

Rationale [2025]: It does not appear that the proposed amendment to the by-laws corrects the unconstitutional provision mandating ordination of a candidate in accordance with *BCO* 20, 21.

Response [2026]: At this time, the By-Laws committee is working on a change to recommend to the Presbytery for final approval.

Rationale [2026]: Please submit revision when approved by Presbytery.

f. **That the following responses shall be submitted to the following GA as no responses were received in 2026:**

2024-04: General 2023 — Men are removed from the membership of Presbytery apart from methods set forth in the *BCO*. This problem also exists in Chapter 5, paragraphs 3-4 of Presbytery's By-Laws. (*BCO* 30 spells out censures that Presbytery may apply after a case without process (*BCO* 38) or a case of process (*BCO* 31, 32, 34, 35, 36) or via transfer (*BCO* 20-9)). Presbytery must either demonstrate that each man who was removed from Presbytery in 2023 was removed by a

Constitutional procedure or the man must be restored to the roll of Presbytery until a Constitutional process is followed.

Response [2025]: TE [Name Omitted] had possessed dual membership with another denomination. Since we do not allow dual membership, we sent multiple notifications to TE [Name Omitted] to repeal his membership in the other denomination. However, TE [Name Omitted] chose not to do so. Therefore, Presbytery had no other choice but to remove his membership.

Rationale [2025]: Presbytery did not respond to the general citation but to a specific matter regarding TE [Name Omitted]. There is no indication that presbytery addressed the flaws in its By-laws. There is no indication that each man removed from membership in 2023 was removed by a constitutional procedure or that they were restored to roll of Presbytery until a constitutional process was followed. Regarding TE [Name Omitted], it does not appear that TE [Name Omitted] was removed by Transfer (*BCO* 20-9, 10), Divestment (38-2), or Deposition (*BCO* 30-5), nor was he restored to membership.

Rationale [2026]: No Response Received.

41. That the Minutes of **Lowcountry Presbytery:** *(59-0-0)*

a. Be approved without exception: **Jul 26, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*RAO* 16-4.c.2) — Presbytery Standing Rules not submitted for review.

2026-02: April 22, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-03: April 22, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

2026-04: Jun 10, 2025 (*BCO* 21-4; *RAO* 16-3.e.7) — Stated differences not recorded in the candidate's own words.

d. **That the following responses to the 53rd GA be found satisfactory:**

2023-01: General 2022 (*RAO* 16-10.a) — No record in minutes of exceptions taken by GA.

Response [2024]: No Response Received.

Response [2026]: Presbytery agrees with the exceptions and corrects its actions, and promises to be more careful in the future.

2023-02: Feb 5, 2022; Jul 23, 2022 (*BCO* 23-1) — No record that Congregation /Session concurred with dissolution of pastoral relations.

Response [2024]: No Response Received.

Response [2026]: Presbytery agrees with the exceptions and corrects its actions, and promises to be more careful in the future.

2023-03: Jul 23, 2022; Nov 3, 2022 (*BCO* 22-2, 3) — No record of calls from the session/Congregation for Pastoral relations.

Response [2024]: No Response Received.
Response [2026]: Presbytery agrees with the exceptions and corrects its actions, and promises to be more careful in the future.

2024-01: General 2023 (*BCO* 20-1; *RAO* 16-3.e.6) — Specific arrangements of call not shown to be approved.
Response [2025]: No Response Received.
Response [2026]: Presbytery agrees with the exceptions and corrects its actions, and promises to be more careful in the future.

2024-02: General 2023 (*BCO* 19-2.f) — No record that licentiate was asked about differences to standards.
Response [2025]: No Response Received.
Response [2026]: Presbytery agrees with the exceptions and corrects its actions, and promises to be more careful in the future.

2024-03: General 2023 (*RAO* 16-4.c.3; *RAO* 16-10.a) — No response to the Assembly concerning disposition of exceptions of substance.
Response [2025]: No Response Received.
Response [2026]: Presbytery agrees with the exceptions and corrects its actions, and promises to be more careful in the future.

2024-04: General 2023 (*RAO* 16-10.a) — No record in minutes of repoonses to exceptions taken by GA.
Response [2025]: No Response Received.
Response [2026]: Presbytery agrees with the exceptions and corrects its actions, and promises to be more careful in the future.

2025-01: Jan 27, 2024 (*BCO* 15-2; *RAO* 14-2) — The presbytery, and not its appointees, "shall elect one of its commissioners to each of these committees of commissioners."
Response [2026]: Presbytery agrees with the exceptions and corrects its actions, and promises to be more careful in the future.

2025-02: Jan 27, 2024 (*BCO* 15-2; *RAO* 14-2) — The presbytery, and not its appointees, shall nominate elders to serve on Permanent Committees
Response [2026]: Presbytery agrees with the exceptions and corrects its actions, and promises to be more careful in the future.

2025-03: Jan 27, 2024 (*BCO* 23-1) — No record that Session was cited to appear before Presbytery
Response [2026]: Presbytery agrees with the exceptions and corrects its actions, and promises to be more careful in the future.

42. That the Minutes of **Metro Atlanta Presbytery:** *(60-0-2)*
    a. Be approved without exception: **Sep 16, 2025; Jan 28, 2025 (ES)**
    b. Be approved with exception of form: **May 6, 2025**
    c. **Be approved with exception of substance:**

2026-01: Jan 28, 2025 (*BCO* 15-1) — Commission report referenced but no record of commission minutes submitted.

2026-02: Jan 28, 2025 (*BCO* 21-4; *RAO* 16-3.e.7) — Stated differences not judged with the prescribed categories.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-06: Oct 3, 2023 (*BCO* 22-6; *BCO* 19-1) — Stated supply approved without licensure.

Response [2025]: TE [Name Omitted] was one of several who supplied at COTR. He is no longer supplying the pulpit. We did have correspondence from the church. We will be more circumspect in future.

Rationale [2025]: The nature of the exception is not whether or not pulpit supply was given with correspondence from the church but whether or not the Supply in question ought to have been approved. (*BCO* 19-1) Presbytery records still make no record of a TE [Name Omitted]; no information can be found in directory; it is unclear who he is.

Response [2026]: This was an error. TE [Name Omitted] is no longer stated supply. In the future we will be clearer on this issue. He is a TE in the PCA in good standing. We will make sure in this situation men are licensed in MAP.

2024-08: Oct 3, 2023 (*BCO* 21-4.g) — Presbytery granted a doctrinal exception that appears to be out of accord with the fundamentals of our doctrinal standards. It is not clear from the difference as stated if the candidate believes there are any forms of recreation that are proscribed by the commandment.

Response [2025]: In further conversation with the candidate, his view is that the day is for worship, rest and reflection. Labor/work, except in the case of necessity, are prohibited.

Rationale [2025]: The response does not address the question about whether there are any forms of recreation that are proscribed by the commandment.

Response [2026]: In general MAP has not asked candidates for a list of forms of recreation that are proscribed by the commandment. The list by nature could not be all inclusive as proscribed means “forbidden” rather we have asked what types would they engage in. Clarification was sought. The candidate does beleive that walking, playing with children is fine.The candidate stated, “some shared recreational activity may serve as spending time with the lonely, foreigners, or strangers but it cannot dispalce worship or become ordinary. He agrees some recreation is forbidden. That which woudl be ordinary.

2025-01: Jan 23, 2024 (*BCO* 15-2) — The presbytery appointed two men to do the work of a commission.

Response [2026]: Until this note, MAP had never been cited for this. In future we will create a commission.

2025-02: Jan 23, 2024 (*BCO* 8-7; *BCO* 13-2) — There was not an annual report from TEs laboring out of bounds or without a call.

Response [2026]: Our Shepherding Committee has now taken over this

responsibility and will be more circumspect at getting reports and citing men for not making reports.

2025-03: May 7, 2024 (*BCO* 20-1) — No record of the reasons why Presbytery considers an out-of-bounds work to be a valid Christian ministry.

Response [2026]: Until this note, MAP had not known it needed to record this. In future, MAP will record reasons why it considers an out of bounds work to be a valid Christian ministry. Note: this will be reflect the reasons this presbytery considers.

2025-04: May 7, 2024 (*BCO* 38-2) — The minutes state that the TE gave notice for reasons for divestiture at a previous meeting, but there is no record in those minutes of such notice. The presbytery divested him without two stated meetings.

Response [2026]: This was a clerical error. He did give reason. January 2026 minutes will reflect.

e. **Concerning reports alleging important delinquency and/or grossly unconstitutional actions:**

The General Assembly find the September 18, 2025, letter from TE Andrew Flatgard and RE Spencer Flatgard is not a report of an "important delinquency or grossly unconstitutional proceedings" (*BCO* 40-5).

Rationale: The report alleged that the Presbytery failed to follow the correct process of *BCO* 40-5. However, the court is not obligated to treat any report submitted as a *BCO* 40-5, the report must judge three criteria as determined by the court: the report needs to be 1) a credible report, determining whether it is either an 2) important delinquency, and/or 3) grossly unconstitutional proceeding. The court acted within their constitutional parameters to take no action regarding the report.

f. **Standing Judicial Commission (SJC) Compliance:**

Metro Atlanta Presbytery has not met following the receipt of the SJC ruling. The review will be deferred to next year's Committee of Review of Presbytery Records (*BCO* 40-2.4; *OMSJC* 17.1.e-f).

2025-04 — Niziol v. Metro Atlanta

Members of the SJC, TE Paul Lee and TE Steve Tipton, refrained from discussion and abstained from the vote on Metro Atlanta Presbytery.

43. That the Minutes of **Metropolitan New York Presbytery:** *(59-3-0)*

a. Be approved without exception: **Jan 14, 2025; Jan 14, 2025 (ES); Sep 16, 2025 (ES)**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Mar 11, 2025 (*BCO* 23-1; 20-4) — Presbytery permitted a congregation to request dissolution of a pastoral relationship with an unapproved method of voting (absentee ballots).

2026-02: May 13, 2025 (*BCO* 21-4.g) — Presbytery granted a doctrinal exception that appears to be hostile to the system of striking at the vitals

of religion ("I believe that the second commandment (Exodus 20:4; Deuteronomy 5:8) forbids images of God made to be worshipped, and cautions against making irreverent images and thoughts about God, but does not outlaw all representations of God whatsoever."). The candidate does not limit his difference to images of the incarnate Christ only, nor does he provide clarification on what images are permissible.

2026-03: May 13, 2025 (*BCO* 21-4.g) — Presbytery granted a doctrinal exception that appears to be out to be hostile to the system of striking at the vitals of religion ("I strongly affirm that there should not be any use of icons in worship. The confession is correct in its application of the second commandment through the majority of question *WLC* 109 and *WCF* 21.5 as it condemns the use of superstitious devices which corrupt the worship of God. However, I believe the confession over-applies the prohibition of icons in worship as it states a prohibition of 'any kind of image or likeness of any creature whatsoever.' I think by broadening the prohibition to 'any' the divines are neglecting the reasonable and fair didactic uses of images of God which do not qualify as superstitious objects, but rather are useful in bringing others (especially children) to a proper understanding of who God is.") The candidate does not limit his difference to images of the incarnate Christ only, nor does he provide explanation of what "fair didactic uses" might be.

2026-04: Sep 16, 2025 (*BCO* 13-6; *BCO* 21-4.e; *RAO* 16-3.e.6) — Incomplete record of a transfer exam.

2026-05: Nov 11, 2025 (*BCO* 38-3) — No record that presbytery made determination in the case of transferring a TE to another denomination as required by *BCO* 38-3.

2026-06: Nov 11, 2025 (*BCO* 40-5) — Presbytery improperly ruled a report of an important delinquency or grossly unconstitutional proceeding (*BCO* 40-5) out of order. Presbytery must determine whether the report is credible or not.

2026-07: Nov 11, 2025 (*BCO* 13-6) — Incomplete record of examination of TE transferring into Presbytery.

2026-08: Nov 11, 2025 (*BCO* 21-4; *RAO* 16-3.e.6) — Incomplete record of ordination exam.

2026-09: Nov 11, 2025 (*BCO* 21-4; *RAO* 16-3.e.6) — Incomplete record of ordination exam.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 (*BCO* 13-11; *BCO* 31-2) — There is insufficient record in the minutes of actions taken by the Presbytery pursuant to their handling of a report concerning the Christian Character of a Teaching Elder subject to their care. Presbytery needs to record in their minutes how they handled the report against the Christian Character.

Response [2026]: Presbytery agrees with the exception and has corrected its minutes. Presbytery ruled on this matter at our

January 2025 meeting but failed to report the ruling to those bringing a report concerning the Christian Character of one of our TE's. When we realized the mistake, we sent the report on June 12, 2025, to those who had originally brought the issue forward. At the September 16, 2025, meeting this matter was taken up in executive session and the report was included in the minutes.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-02: Mar 12, 2024 (*BCO* 23-1) — Pastoral call dissolved without record that the congregation was cited to appear to show cause

Response [2026]: Presbytery respectfully disagrees. TE [Name Omitted] was at presbytery on the day his call was dissolved, and he did not contest it. Though no RE's were present from [Church Name Omitted], we can assume from the dissolution letter attached to the minutes that the congregational vote to dissolve his call was in order and approved by the congregation.

Rationale [2026]: Presbytery's response provides no evidence of Presbytery's citation to the congregation per *BCO* 23-1. Presbytery may not assume and is constitutionally required to cite congregations to appear by commissioners, which may be different parties than their delegated Ruling Elder representatives.

2025-03: May 14, 2024 (*BCO* 23-1) — Two pastoral calls dissolved without record that the congregations were cited to appear to show cause.

Response [2026]: Presbytery respectfully disagrees. TE [Name Omitted] was at presbytery on the day his call was dissolved, and he did not contest it. Though no RE's from [Church Name Omitted] were present, we can assume from the dissolution letter attached to the minutes that the congregational vote to dissolve his call was in order and approved by the congregation. The other TE mentioned was the pastor of a church OOB.

Rationale [2026]: Presbytery's response provides no evidence of Presbytery's citation to the congregation per *BCO* 23-1. Presbytery may not assume and is constitutionally required to cite congregations to appear by commissioners, which may be different parties than their delegated Ruling Elder representatives.

2025-04: Nov 12, 2024 (*BCO* 19-2.f; 19-1; 1 Tim. 2:12) — Presbytery ruled that the TE's view that it is permissible for a woman to preach is "not out of accord with any fundamental of our system of doctrine because the difference is neither hostile to the system nor strikes at the vitals of religion." This was error as such a view is clearly contrary to scripture.

Response [2026]: The issue of exception of substance raised by RPR is now moot since the TE is no longer a member of Metropolitan

New York Presbytery. The TE has transfered his membership ot the Reformed Church in America as of the 11/11/25 meeting of presbytery.

Rationale [2026]: Presbytery did not address its own action in approving a stated difference out of accord with any fundamental of our system of doctrine. Presbytery needs to reply according to *RAO* 16-10.b.

44. That the Minutes of Presbytery of **Mississippi Valley:** *(62-0-0)*

a. Be approved without exception: **Feb 4, 2025; Aug 5, 2025; May 6, 2025 (ES); Nov 4, 2025 (ES)**

b. Be approved with exception of form: **May 6, 2025**

c. **Be approved with exception of substance:**

2026-01: Nov 4, 2025 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of exam for minister seeking admission from another denomination.

2026-02: Nov 4, 2025 (*BCO* 38-1) — No record the court attempted to inform the offended person prior to approval of confession.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: May 7, 2024 (*BCO* 21-4; *RAO* 16-3.e.6) — Ordination candidate's stated differences not recorded.

Response [2026]: PMV thanks CRPR for their efforts and agrees that the candidate's differences were not stated Because the court had already judged his differences during his licensure exam. PMV will Update their practice in the future to include stated difference during both licensure and Ordination exams.

2025-02: May 7, 2024 (*BCO* 18-7) — Sufficient reason for withdrawal of candidate not given.

Response [2026]: PMV recognizes the requirements of 18-7, but also desires to protect the privacy of the former Candidate, the candidate therefore is unable to devote himself to the necessary training and trial of his gifts.

2025-03: May 7, 2024 (*BCO* 19-13) — Reasons for rescission of intern status not recorded.

Response [2026]: PMV recognizes the requirements of 18-7, but also desires to protect the privacy of the former Candidate, the candidate therefore is unable to devote himself to the necessary training and trial of his gifts

2025-05: Aug 6, 2024 (*BCO* 13-6) — Incomplete record of examination of TE transferring into Presbytery.

Response [2026]: PMV respectfully disagrees with this exception of substance, the examination was not an ordination exam but a transfer exam, which follows 13-6, which calls for "Christian experience, personal character, and views. PMV did so but will endeavor to make that clearer in the future

2025-06: Aug 6, 2024 (*BCO* 13-6) — Incomplete record of examination of TE

transferring into Presbytery.

Response [2026]: PMV respectfully disagrees with this exception of substance, the examination was not an ordination exam but a transfer exam, which follows 13-6, which calls for "Christian experience, personal character, and views." PMV did so but will endeavor to make that clearer in the future.

2025-07: Aug 6, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

Response [2026]: PMV agrees with this exception, each candidate's seminary work in the Greek and Hebrew were accepted instead of an examination in the languages from the floor. PMV will endeavor to make this clearer in the future.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-04: May 7, 2024 (*BCO* 20-8) — No record commissioners appointed by the church presented and prosecuted the calls before the Presbytery.

Response [2026]: PMV respectfully disagrees with this Exception as the commission reports for each candidate Will be found on the following pages, 190, 191, 262, 263, 264, 361, 362, 363 and the final report is located in the Feb 2025 minutes

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not addressed the underlying exception. The cited pages document commission reports, not the appointment of commissioners by the calling church to present and prosecute the calls before Presbytery as required by *BCO* 20-8.

45. That the Minutes of **Missouri Presbytery:** *(51-11-1)*

a. Be approved without exception: **Jan 21, 2025; Aug 26, 2025; Sep 29, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Apr 22, 2025 (*BCO* 21-9) — No record of installation

2026-02: Jul 19, 2025 (*RAO* 16-3.e.1) — Reasons for a chair's ruling on a point of order not given.

2026-03: Oct 21, 2025 (*BCO* 21-4.f.) — Presbytery granted a doctrinal exception that appears to be hostile to the system or striking at the vitals of religion (*BCO* 21-4.f.). The transfer candidate states regarding *WLC* 109:

"It is my contention that I do not have a difference with *WLC* #109, but it is evident that I understand the *WLC* differently than some presbyteries.

It seems evident to me that there is a pattern in *WLC* #109 that is quite definitive to our understanding of the prohibition of idolatry. The phrase "all worshiping of it" follows each prohibition against making or imagining representations of deity. It is precisely the act of worship

that changes an image into an idol.

I affirm that images of God should not be used in public or private worship. I affirm the need to protect the worship of the Lord as he has instituted it. I affirm the teaching that it is a violation of the second commandment to make a thing, in any way, be it in reality or by imagination, and to worship it.

However, some of my brothers do not see act of worship as the defining characteristic of idolatry expressed in *WLC* #109 and rather believe that *WLC* #109 teaches that any making of an image or imagining deity is inherently a violation of the second commandment. If such a reading of *WLC*#109 is preferred, than I must state a difference.

The Holy scriptures describe the person of Jesus Christ in narratives that are written in a form that inspires the imagination to consider the historic and real things described. We must certainly be able to make a distinction between a sign and the thing signified. As such, we must never worship the sign (be it corporeal image or imagined) but by acknowledging the necessary distinction we are able to read the scriptures with the full capacities of the imago dei involved.

While I caution in strong terms that it may be unwise to render art or didactic materials with images of deity, I must make a distinction between implicit sinfulness and possible folly. Insofar as the scriptures describe the real person of Jesus we can make good didactic use of materials that have images as we shepherd children and help them grow an affection for Christ. In doing so we are able to and required to teach them that we do not know what Jesus looked like, that the image they see is not Jesus himself, and that no image may be worshipped. (1 John 1:1, John 20:24-29, Exodus 31:1-11, 1 Corinthians 11)"

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-01: General 2023 (*BCO* 19-12) — Annual report of interns not included.

Response [2025]: Missouri Presbytery respectfully disagrees with the exception of substance and refers it back to the Assembly. *BCO* 19-12 states: "Reports on every intern in the Presbytery should be presented at each stated meeting of the Presbytery by the committee of Presbytery charged with the oversight of interns, and these reports shall become a part of the minutes of Presbytery. The Presbytery shall also require every intern himself to make a report to it at least once a year describing his ministerial experiences. If the intern is still in school, the Presbytery shall secure from his instructors an annual report upon his deportment, diligence, and progress in study." This paragraph address three types of reports - (1) Reports on every intern; (2) Reports from every intern; and (3) Reports from instructors of those interns still in school. Missouri Presbytery assumes that the language of the exception ("report of interns") refers to the reports from every intern. The *BCO* is very clear

that the only reports that are required to be included in the minutes of Presbytery are the reports on the interns. Furthermore such reports "on" interns are not themselves mandatory as the *BCO* states that such reports "should" be made. Missouri Presbytery's Candidates and Interns Committee presents a verbal report on the interns at each stated meeting and the report on the interns is recorded in the Presbytery's minutes. The *BCO* does not specify that the reports submitted by the interns are to be recorded in the minutes. The *BCO* specifies information to be included in Presbytery minutes in a number of places; therefore, the absence of language requiring that reports from the interns be recorded in the minutes must be viewed as intentional.

Rationale [2025]: The fact that reports from interns were received must be recorded in the minutes, and reports on interns must be received at each meeting.

Response [2026]: The fact that reports from interns were received was recorded in the minutes (Appendix H of the minutes of the October 15, 2024 stated meeting), and reports on interns were received at each meeting as reported in the minutes of each stated meeting of the presbytery. Such reports will continue to be reported in the Presbytery's minutes.

2024-05: General 2023 (*BCO* 13.9.b; *BCO* 40-1) — Incomplete record of review of records of church sessions

Response [2025]: Missouri Presbytery respectfully disagrees with the exception and refers it back to the Assembly. Although not all sessions submitted minutes for review, Missouri Presbytery reported on all session minutes that were reviewed during 2023. Therefore there was a complete record of the session minutes that were reviewed. The Presbytery continues to press for compliance with this review obligation and, further, has reviwed the manner in which it reports the review of session records for additional clarity and to further encourage all session to timely submit session minutes for review.

Rationale [2025]: *BCO* 40-1 makes it clear that the Presbytery has a duty to review the records of all sessions within their bounds. A review is incomplete even if the presbytery reviews all the records that are submitted, but fails to receive records from all churches.

Response [2026]: The presbytery continues to stress to its member churches the responsibility of submitting complete session minutes for review each year. For calendar year 2025, session minutes were submitted by all sessions and all submitted minutes have been reviewed. The presbytery will continue to work toward receiving session minutes from all member

churches.

2024-06: General 2023 (*BCO* 46-6; *BCO* 13-7) — No record reflecting when a man who was transferred to another presbytery was received by that presbytery.

Response [2025]: Missouri Presbytery respectfully disagrees with the exception and refers it back to the Assembly. *BCO* 13-7 refers to ordination and to ministers admitted into membership in the Presbytery, not to those transferring to another Presbytery. *BCO* 46-6 does not require that a record of reception by another Presbytery to which a TE is transferred be recorded in the minutes. A record of reception of a transferred TE is maintained in the Presbytery Portal maintained by the Office of the Stated Clerk for such purposes.

Rationale [2025]: The Presbytery Portal is not equivalent to the Presbytery's minutes. The Portal can serve as a "certificate of dismission" but the reception of the TE needs to be recorded in both Presbyteries' minutes once it occurs.

Response [2026]: The fact that two TEs transferred to other presbyteries in 2023 were received by their presbyteries was recorded in the minutes of the October 21, 2025 stated meeting of presbytery. Missouri Presbytery promises to be more careful in the future.

2024-10: General 2023 (*BCO* 46-6) — No recording regarding the reception of a certificate of dismissal from transferring presbytery.

Response [2025]: Missouri Presbytery respectfully disagrees with the exception and refers it back to the Assembly. *BCO* 46-6 does not require that a record of dismissal by another Presbytery from which a TE is transferring into Missouri Presbytery be recorded in the minutes. A record of dismissal of a TE transferring into Missouri Presbytery is maintained in the Presbytery Portal maintained by the Office of the Stated Clerk for such purposes.

Rationale [2025]: The Presbytery Portal is not the minutes of the Presbytery and the record of dismission from a previous presbytery needs to be recorded in the minutes.

Response [2026]: The fact that two TEs transferred from other presbyteries in 2023 were dismissed by their presbyteries was recorded in the minutes of the October 21, 2025 stated meeting of presbytery. Missouri Presbytery promises to be more careful in the future.

2025-01: General 2024 (*BCO* 15-2) — Installation commission's' formation and composition was not approved by Presbytery.

Response [2026]: Missouri Presbytery agrees with the exception, has corrected the record by adopting a resolution (Resolution 2510-06) that ratifies the formation of each TE installation

commission whose report was submitted to, and approved by, the presbytery during 2024 and 2025, and promises to be more careful in the future.

46. That the Minutes of **Nashville Presbytery:** *(48-15-0)*

a. Be approved without exception: **Feb 11, 2025; Apr 29, 2025; May 19, 2025; Jun 16, 2025; Feb 11, 2025 (ES); Apr 29, 2025 (ES); Jun 16, 2025 (ES); Aug 12, 2025 (ES); Nov 11, 2025 (ES)**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Aug 12, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session and six months membership for candidate.

2026-02: Nov 11, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-03: Nov 11, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session and six months membership for candidate.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Feb 13, 2024 (*BCO* 38) — Presbytery judged the Episcopal Church as another branch of the visible church – which faithfully maintains the Word and Sacraments – by utilizing *BCO* 38-3.a instead of utilizing *BCO* 38-3.b and thereby judge this body as "failing to maintain the Word and Sacraments in their fundamental integrity."

Response [2026]: Presbytery respectfully disagrees with this exception and refers it back to the Assembly with the following rationale:

We acted in accordance with the Book of Church Order, and in no way transgressed the Constitution of the PCA by taking this action. BCO 38-3 requires that the court of original jurisdiction regarding a member or officer withdrawing from the PCA should make two judgments: [1] whether the "body" to which the member or officer is withdrawing maintains the Word and Sacraments in their fundamental integrity (i.e., a true branch of the Church, BCO 2-2), and [2] whether the "member or officer" in question is deemed to be a member of the Church.

Regarding the former, BCO 38-3 clearly states that this judgment is to be made by the court of original jurisdiction for obvious reasons. It is the local court, in this case the Presbytery, which has the most knowledge of the minister and of the circumstances surrounding his transfer. These matters can be difficult to discern from afar and should be left to the local court to act upon with great discretion and wisdom based on the full view of the facts. The duty of this judgment lies with the Presbytery, and we exercised this right responsibly.

According to BCO 38-3.b, it is the task of the Presbytery to judge the "body" with which the minister is affiliating. In this case, the minister in question (hereinafter referred to as "the

teaching elder") was withdrawing from the PCA to affiliate with the Episcopal Diocese of Florida. According to the Constitution and Canons of the Episcopal Church, the court of original jurisdiction for priests in the Episcopal Church is the Diocese. Canon I.13.1 states that every clergyman belongs to the Church in the Diocese in which he serves. Furthermore, Canon III.8.7 and Canon III.10.4 describe men seeking ordination in the Episcopal Church, including those men transferring from other denominations, as being ordained and received in the Diocese by the Bishop, which the teaching elder clearly understood according to his letter to the Nashville Presbytery. Therefore, in the case of the teaching elder, the "body" with which he was seeking to affiliate was the Episcopal Diocese of Florida by nature of his call to [Church Name Omitted] within the jurisdiction of that Diocese under the authority of then Bishop [Name Omitted].

Bishop [Name Omitted] is judged by all accounts to maintain an orthodox view of the Scriptures and to maintain the Sacraments in their fundamental integrity. He has been publicly impugned by liberal Episcopalians for his firm stance and orthodox biblical teaching on human sexuality and marriage. He has been affiliated with the Communion Partners, a conservative evangelical group in the Episcopal Church which opposed the 77th General Episcopal Convention's decision to authorize the blessing of same-sex marriages in 2012. Bishop [Name Omitted] has also been featured in the conservative publication [Name Omitted] for his conservative, orthodox stances in governing his Diocese. In the debates over this citation, much was made about concerns men have about the Episcopal Church broadly. We share those concerns. However, as previously stated BCO 38-3 specifies that judgment is made on the "body" which the man is joining. In this case, that body is the Episcopal Diocese of Florida, which clearly maintains the Word and Sacraments in their fundamental integrity.

Furthermore, in addition to seeking to affiliate with a conservative Diocese with a recent history of being led by a conservative evangelical bishop, the teaching elder received a particular call to serve as Associate Rector at [Church Name Omitted] in Jacksonville, Florida. [Church Name Omitted]'s is a Gospel preaching, evangelical parish. By the teaching elder's own account, while "the Episcopal Church is an embattled denomination…I've had the blessing of walking alongside many faithful, orthodox priests committed to God's Word, the redemption of His church, and His people." Therefore, taking all the above information into account, the Nashville Presbytery

judged that the teaching elder was affiliating with a "body" that maintains the Word and Sacraments in their fundamental integrity (i.e., a true branch of the Church).

Finally, as stated previously, BCO 38-3 requires a judgment not only of the body with which a minister seeks to affiliate but a judgment of the minister himself. BCO 38-3.b cites a condemnation of both the body and the man who seeks to withdraw. In Our Bond of Union: A Commentary on the BCO of the PCA, Per Almquist states that inflicting 38-3.b is to judge that "they are no longer recognized as [a] member of the Church." (Almquist, 326) By the teaching elder's own account:

"It is important you know I do not make this move lightly, without prayer, or without seeking wise counsel. My theological convictions, views on scripture, salvation, and the finished work of Christ have not changed. However, where the Lord is calling me to proclaim these truths has." (Full letter attached.)

This is certainly the statement of a man who is committed to the Gospel of Jesus Christ and seeks to be a faithful witness to the community in which he has been called to serve. For the good of Christ's Church on earth and for the soul of the teaching elder we exercised our judgment with care. We love our brother and if we believed he was leaving for no true church we would warn him! However, based on all the evidence presented here, we judge that the body to which the teaching elder has withdrawn maintains the Word and Sacraments in their fundamental integrity and that the teaching elder remains a member in Christ's Church.

2025-02: Apr 30, 2024 (*BCO* 23-1) — No record that churches were cited to appear and show cause re dissolution of pastoral calls

Response [2026]: Presbytery agrees with this exception and corrects its record. The churches in each case concurred with the requests, but presbytery failed to record that fact in our minutes. We promise to be more careful in the future.

2025-03: Apr 30, 2024 (*BCO* 18-2) — No record of six months membership for multiple candidates coming under care.

Response [2026]: Presbytery agrees with this exception and corrects its record. The candidates' 6-month membership was confirmed, but presbytery failed to record that fact in our minutes. We promise to be more careful in the future.

2025-04: Aug 13, 2024 (*BCO* 23-1) — No record congregation was cited to appear and show cause re dissolution of TE call.

Response [2026]: Presbytery agrees with this exception and corrects its record. The church concurred with the requests, but presbytery failed to record that fact in our minutes. We promise

to be more careful in the future.

e. **Standing Judicial Commission (SJC) Compliance:**
Nashville Presbytery has not recorded the full decision in their minutes and/or has not provided a statement describing how the lower court has complied with any amends contained therein (*BCO* 40-2.4; *OMSJC* 17.1.e-f):
2023-18 — Sears v. Nashville

47. That the Minutes of **New Jersey Presbytery:** *(63-0-0)*
a. Be approved without exception: **May 17, 2025; Sep 20, 2025; Nov 15, 2025**
b. Be approved with exception of form: **Jul 19, 2025**
c. **Be approved with exception of substance:**
2026-01: General 2025 (*BCO* 40-1) — No record of review of records of church sessions.
2026-02: Mar 15, 2025 (*BCO* 21-4.e) — No record of specific attention to *BCO* 21-4e notorious concerns in transfer exam for TE from outside the PCA.
d. **That the following responses to the 53rd GA be found satisfactory:**
2025-01: Mar 16, 2024 (*BCO* 15-1.; *RAO* 16-3.e.4) — Commission minutes are not recorded.
Response [2026]: The Presbytery agrees that our *BCO* and *RAO* require that minutes of a Commission's work be recorded and submitted to the Presbytery and we acknowledge our error in not doing so. The matter committed to the Commission was to elect and approve presbyters to attend the 2024 General Assembly as such men indicated their willingness to attend and serve. We note as a Presbytery that the Commission never met as men were chosen at large during our subsequent meeting in May.
2025-02: May 18, 2024 (*BCO* 15-1) — Committee acted as a Commission, taking up business not under their authority.
Response [2026]: The Presbytery notes that this exception is found in our September 2024 Minutes. The Presbytery agrees that our Minutes are unclear regarding the actions taken and the reasons for those actions. The Presbytery acted in accordance with our Standing Rules in asking the Ministerial Committee to act as a Commission in the dissolution of the pastoral relationship of the former pastor of [Church Name Omitted]. While engaged in that process, the Session of the church asked that a Moderator be appointed as part of that process of dissolution since they had no Moderator. In response, the Commission appointed TE [Name Omitted] to serve as Moderator temporarily until the November meeting when Mr. [Name Omitted], a new Licentiate, serving as Stated Supply, would be ordained and called as the new Pastor. The Presbytery believes that its action was all part of the dissolution of the former pastoral

relationship. However, the Presbytery will be more careful in the future to explicitly explain the reasons why it acted the way it did in such a situation.

2025-03: May 18, 2024 (*BCO* 18-2) — No record of six months membership for candidate.

Response [2026]: The Presbytery notes that this exception is found in our September 2024 Minutes. The Presbytery agrees with this exception and admits that it failed to explicitly record the fact that Mr. [Name Omitted] was a member in good standing for at least six months before coming under care (*BCO* 18-2). The Presbytery notes that the record does indicate this fact in the Session Endorsement letter sent and included in the minutes. We will be more careful to explicitly record this requirement having been met in the record of the exam.

2025-04: May 18, 2024 (*BCO* 22-5; *BCO* 22-6) — Student Supply not approved by Presbytery.

Response [2026]: The Presbytery notes that this exception is found in our September 2024 Minutes. The Presbytery agrees with the exception and will seek to be more careful in the future to explicitly record its actions using the language of our *BCO*. The Presbytery notes that the record does state that "He currently lives in Ocean City, NJ and has been asked to serve as Student Supply (*BCO* 22-5) for [Church Name Omitted] (PCA)." Presbytery believed that this statement fulfilled the requirement of the *BCO* in this case and its action was the approval of the Presbytery. However, we will be more careful in the future to more explicitly record our actions according to the *BCO*.

2025-05: Nov 16, 2024 (*BCO* 21-4a; 21-4d) — Inadequate explanation recorded of waiving educational requirements.

Response [2026]: The Presbytery respectfully disagrees with this exception, but acknowledges it could have provided even more information to justify our decision to waive the educational requirements for this candidate. Mr. [Name Omitted] received a Bachelor of Divinity from Greenville Theological Seminary. The Chairman called the seminary and spoke with Academic Dean, Dr. [Name Omitted], regarding their practice of admitting students to seminary without a college diploma. Dr. [Name Omitted] expressed his confidence that Mr. [Name Omitted] possessed more than sufficient maturity, intellect, and life experience to do well in seminary. Their own view of this educational exception matches ours in that we believe his more than 15 years of experience in the construction business (with his father) where he was exposed to many aspects of the business is comparable to a college education and satisfies that requirement. Mr. [Name Omitted]'s seminary transcript

provides ample evidence that he was more than capable of doing the work. In the end, the Presbytery believed that it was well within its authority to omit this requirement for these reasons and voted unanimously to do so. We trust the Committee will agree with us and find this answer acceptable.

2025-06: Nov 16, 2024 (*BCO* 18-2) — No record of six-month recorded membership for candidate.

Response [2026]: The Presbytery agrees with this exception and admits that it failed to explicitly record the fact that Mr. [Name Omitted] was a member in good standing for at least six months before coming under care (*BCO* 18-2). The Presbytery notes that the record does indicate this fact in the Session Endorsement letter sent and included in the minutes. We will be more careful to explicitly record this requirement having been met in the record of the exam.

2025-07: Nov 16, 2024 (*BCO* 46-6; *BCO* 13-7) — No record regarding the reception of a certificate of dismissal from the transferring presbytery.

Response [2026]: The Presbytery agrees with this exception and admits that it failed to record in the Minutes of 2024 that we had received a certificate of dismissal for Rev. [Name Omitted] from Eastern PA Presbytery. Presbytery has corrected its record by recording its receipt of the notice of transfer being approved through the Presbytery Portal on November 25, 2024, in the minutes of our Stated Meeting on September 20, 2025.

e. **That the following responses shall be submitted to the following GA as no responses were received in 2026:**

2024-01: General 2023 (*BCO* 5-3.c) — TE [Name Omitted] was called in a meeting to serve as the church planter of [Church Name Omitted], but was not made a member of the commission acting as that church's session.

Response [2025]: No Response Received.

Response [2026]: No Response Received.

48. That the Minutes of **New River Presbytery:** *(60-0-0)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **Mar 1, 2025; Aug 2, 2025; Nov 8, 2025**

c. **Be approved with exception of substance:**

2026-01: Sep 4, 2025 (*RAO* 16-3.e.1) — Reasons for a chair's ruling on a point of order not given.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-01: Aug 5, 2023 (*BCO* 18-2) — No record of endorsement by candidate's session.

Response [2025]: We agree with this exception. The necessary endorsement of the candidate was provided to the presbytery at a previous stated meeting (i.e., on November 5, 2022), which is

when the candidate was originally intending to come under care. We, however, should have included the endorsement in the minutes from August 5, 2023. We will try to do better in the future.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

Response [2026]: We have corrected our minutes to reflect this. "We confirmed, as noted in our November 5, 2022 minutes, the reception of the recommendation of his session and the confirmation of his church membership of greater than 6 months."

2024-03: Nov 4, 2023 (*BCO* 18-2) — No record of endorsement by candidate's Session.

Response [2025]: We agree with this exception. The candidate did receive an endorsement, but we failed to record it. We will try to do better in the future.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

Response [2026]: We have corrected our minutes accordingly: "TE [Name Omitted] read the testimonial from TE [Name Omitted] for the provisional session of [Church Name Omitted], recommending [Name Omitted] for coming under care. [Name Omitted] has been a member for more than 6 months of [Church Name Omitted]. [Name Omitted] then answered questions from the floor. M/s/c to arrest this portion of the exam."

2025-01: General 2024 (*BCO* 13-9.b; 40-1) — No record of review of records of church Sessions.

Response [2026]: We apologize for this oversight. Our Administrative Committee was remiss in completing this task, but submitted their work to the presbytery for its review at our August, 2025 meeting. This is noted in the minutes of that meeting. We will try to do better in the future.

2025-02: Mar 2, 2024 (*BCO* 21-4.c(1)(a); *RAO* 16-3.e.5) — Incomplete record of ordination exam.

Response [2026]: Our minutes reflect that [Name Omitted] was examined during his licensure exam in the required areas, including: "his acquaintance with experiential religion, especially his personal character and family management (based on the qualifications set out in 1 Timothy 3:1-7, and Titus 1:6-9)" as noted in our minutes of March 2, 2024: "M/c that the Presbytery accept [Name Omitted] previously passed licensure examination (completed at the previous stated meeting of New River Presbytery) in lieu of re-examination in the areas of Christian experience, English Bible content, theology, and church government (per *BCO* 21-4.c(1)(a), (c),

(d), (h)), as well as his previously preached sermon (per *BCO* 21-4.c(4)).”

2025-04: Mar 2, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Stated differences not judged with the prescribed categories.

Response [2026]: [Name Omitted]'s statement regarding any stated exceptions was M/S/A in answer to RPR. It reads as follows: “Upon further consideration of *WCF* 24.4, and consistent with my initial testimony during my examinations, I confirm that I hold no exceptions to the Westminster Standards. [Name Omitted]”

2025-05: Mar 2, 2024 (*BCO* 19-16) — 3/4 vote for waiving internship requirement not recorded.

Response [2026]: We apologize for failing to note this. This vote was taken, and exceeded the 3/4 majority, but was not properly recorded. This has been corrected in the minutes of the March 2, 2024 meeting. We will try to do better in the future.

2025-09: Aug 3, 2024 (*BCO* 18-2) — No record of endorsement by candidate's Session. No record of six months membership for candidate.

Response [2026]: We apologize for our error. The Session of [Church Name Omitted] did give their endorsement of TE [Name Omitted] and he was a member of that body for more than 6 months. The minutes now read: “The body accepted the endorsement of the Session of [Church Name Omitted] for [Name Omitted] and noted his membership with that body in excess of 6 months.”

2025-11: Aug 3, 2024 (*BCO* PP 6; *BCO* 5; 15-1) — No record that members of interim/provisional Session were called by the congregation.

Response [2026]: Upon further investigation, the moderator determined that the course of action chosen by the presbytery was not possible, because the congregation could not be called to approve a temporary session, so the moderator never appointed a temporary session. The Presbytery has continued to investigate and discuss the most ecclesiastically and legally appropriate way to dissolve the church, but has not yet resolved the issue completely, therefore we have rescinded this previous action.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2024-05: Nov 4, 2023 (*BCO* 19-2) — No record of requiring statement of differences with our Standards.

Response [2025]: We agree with this exception. The Candidates and Credentials Committee of the New River Presbytery did receive the necessary information from each candidate, but we failed to record this in the minutes. All three men positively stated (both in writing and on the floor) that they took no exceptions to the

Standards. We just did not record this in the minutes. We will try to do better in the future.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

Response [2026]: We have amended our minutes to reflect this: "All three candidates were asked about any stated differences with our standards and all noted that they took no exceptions to the Standards."

Rationale [2026]: No record Presbytery amended its minutes. A motion to approve exception responses does not constitute a motion to amend something previously adopted.

2024-06: Dec 11, 2022 (*BCO* 13-12) — Notice for called meeting not in order (10-day notice, verbatim meeting call, etc., not indicated/recorded).

Response [2025]: We agree with this exception. We will try to do better in the future.

Rationale [2025]: Presbytery has not clarified whether the notice for the called meeting was in order, and, if not, whether any subsequent business has been ratified. No record that Presbytery corrected its record (*RAO* 16-10.b.1).

Response [2026]: We apologize for our error. More than a 10 day notice was given and it was in order. The sole purpose of the meeting was the installation of TE [Name Omitted] at [Church Name Omitted]. Our minutes will now read: "The Called Meeting of New River Presbytery (NRP), which was found to be in order." We will try to do better in the future

Rationale [2026]: No record Presbytery amended its minutes. A motion to approve exception responses does not constitute a motion to amend something previously adopted.

2025-06: Mar 2, 2024 (*BCO* 8-7; 20-1) — No record of the reasons why Presbytery considers an out-of-bounds work to be a valid Christian ministry. No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church. No record that out-of-bounds TE is engaged in preaching and teaching the Word.

Response [2026]: We apologize for our error in failing to note these approved items. Our minutes have been amended to reflect this. "The presbytery voted to approve the call to [Church Name Omitted] as a valid out-of-bounds work, where TE [Name Omitted] will have full freedom to maintain and teach the doctrine of our Church and where he will be engaged in preaching and teaching the Word."

Rationale [2026]: Presbytery still has not given reasons why it views the call as a valid Christian ministry (*BCO* 20-1).

2025-07: Mar 2, 2024 (*PP* II.6; *BCO* 5-3.c; 15-2) — Presbytery appointed a commission with only one teaching elder and one ruling elder. No

record that members of interim/provisional Session were called by the congregation.

Response [2026]: We rescind this action of the presbytery.

Rationale [2026]: No record of Presbytery rescinding the action. Approving responses to the General Assembly for exceptions of substance does not constitute taking the action described.

2025-08: Mar 2, 2024 (*BCO* 21-5-11; *RAO* 16-4.4.) — Not all elements of ordination service recorded.

Response [2026]: We apologize for our error. We have amended the minutes of this meeting to reflect this: "During the worship service, [Name Omitted] led worship, noting the proceedings of the Presbytery preparatory to the ordination; he pointed out the nature and importance of the ordinance, and endeavored to impress the audience with a proper sense of the solemnity of the transaction. [Name Omitted] preached a sermon. [Name Omitted] administered the installation questions to [Name Omitted] and the congregation (*BCO* 21-9 and 21-10). [Name Omitted] gave the charge to [Name Omitted] and the congregation." We will try to do better in the future.

Rationale [2026]: No record Presbytery amended its minutes. A motion to approve exception responses does not constitute a motion to amend something previously adopted.

2025-10: Aug 3, 2024 (*BCO* 19-2.b; 19-2.f) — All specific requirements of licensure exam not recorded. No record of requiring statement of differences with our Standards. All specific requirements of licensure exam not recorded.

Response [2026]: We apologize for any confusion, [Name Omitted] was examined in all areas of *BCO* 19.2b and 19-2f and noted that he holds no stated differences at our November 4, 2023 meeting. The August 3, 2024 now record this information.

Rationale [2026]: No record Presbytery amended its minutes. A motion to approve exception responses does not constitute a motion to amend something previously adopted.

2025-12: Nov 2, 2024 (*BCO* 46-6; 13-7) — No record regarding the reception of a certificate of dismission from transferring presbytery.

Response [2026]: We apologize for our error in not recording this. Our minutes will reflect that: "We received certificate of dismission from James River Presbytery."

Rationale [2026]: No record Presbytery amended its minutes. A motion to approve exception responses does not constitute a motion to amend something previously adopted.

2025-13: Nov 2, 2024 (*BCO* 20-1; *RAO* 16-3.e.6) — Specific arrangements of call not shown to be approved.

Response [2026]: We apologize for our lack of clarity. The minutes will now reflect: "The leadership of [Church Omitted] then

presented the specific arrangements of the ministerial call for [Name Omitted] to the presbytery. M/s/c that this call was found in order and the presbytery deems it for the good of the church. The call was placed in the hands of [Name Omitted], who offered his approval and acceptance of the call."

Rationale [2026]: No record Presbytery amended its minutes. A motion to approve exception responses does not constitute a motion to amend something previously adopted.

f. **That the following responses shall be submitted to the following GA as no responses were received in 2026:**

2024-02: Aug 5, 2023 (*BCO* 18-2) — No record of six months membership for candidate.

Response [2025]: We agree with this exception. Though the candidate met this requirement, it was not recorded. We will try to do better in the future.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

Response [2026]: No Response Received.

2024-04: Nov 4, 2023 (*BCO* 18-2) — No record of six months membership for candidate.

Response [2025]: We agree with this exception. Though the candidate met this requirement, it was not recorded. We will try to do better in the future.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

Response [2026]: No Response Received.

2025-03: Mar 2, 2024 (*BCO* 21-4.f; 8-7) — Presbytery failed to receive a clear statement of a man's possible difference on the sacraments in his own words.

Response [2026]: No Response Received.

49. That the Minutes of **New York State Presbytery:** *(63-0-1)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **Jan 25, 2025; Sep 26–27, 2025**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 13.9.b; *BCO* 40-1) — Incomplete record of review of records of church sessions.

2026-02: Apr 26, 2025 (*BCO* 21-4.e; *RAO* 16-3.e.6) — No record that Presbytery examined concerning the requirements of *BCO* 21-4.e.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 (*BCO* 8-7) — No record of annual reports of TE(s) laboring out of bounds

Response [2026]: New York State Presbytery regrets this omission from our records. We were able to find two TEs without reports in 2024: [Names Omitted] [Name Omitted] gave his report in January 2025 after we discovered the omission. [Name Omitted] is in the process transitioning to HR status. We will endeavor to keep better records regarding our reports in the future.

2025-02: Jan 20, 2024 (*BCO* 46-6; *BCO* 13-7) — No record of when a man who was transferred to another presbytery was received by that presbytery

Response [2026]: New York State Presbytery regrets this omission from our records. The transferring TE was indeed received by Ohio Valley Presbytery. We have amended the record and will endeavor to keep better records regarding ministerial transfers in the future.

2025-03: Sep 20–21, 2024 (*BCO* 5-9.i.1; *BCO* 24-6) — No record of laying on of hands or prayer of installation/ordination given for officers of [Name Omitted].

Response [2026]: New York State Presbytery respectfully disagrees with this exception to our minutes. The commission records show in the service bulletin that, in fact, there was a laying on of hands and a prayer of installation for the officers of [Church Name Redacted]. Those commission records were included in the items for RPR to review for the 2025 General Assembly. (Please refer to page 89, under “Prayer”.)

50. That the Minutes of **North Florida Presbytery:** *(63-0-0)*

a. Be approved without exception: **Feb 8, 2025; Mar 18, 2025; May 8, 2025; May 25, 2025; Sep 11, 2025**

b. Be approved with exception of form: **Nov 13, 2025**

c. Be approved with exception of substance: **None.**

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-01: Nov 9, 2023 (*BCO* 21-4.c.(1)(b)) — Incomplete record of ordination exam

Response [2025]: Presbytery agrees with this exception and will be more careful in the future. The candidate did complete a seminary course that included study of the Greek and Hebrew languages.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

Response [2026]: Presbytery agrees with the exception, has corrected its record by a motion to Amend Something Previously Adopted to note that the candidate completed a seminary degree that included study of the original languages in lieu of an oral examination in the original languages (*BCO* 21-4.c), has made a marginal notation in the original minutes referring to this response, and promises to be more careful in the future.

2025-01: Aug 8, 2024 (*BCO* 13-9; 40-3) — Results of review of records of church Session not stated.

Response [2026]: Presbytery agrees with the exception and recorded the results of the Session records reviewed, has corrected its record by a motion to Amend Something Previously Adopted, has made a marginal notation in the original minutes referring to this response, and promises to be more careful in the future.

2025-02: Nov 14, 2024 (*BCO* 13-9.b; *BCO* 40-3) — Results of review of records of church session not stated.

Response [2026]: Presbytery agrees with the exception and recorded the results of the Session records reviewed, has corrected its record by a motion to Amend Something Previously Adopted, has made a marginal notation in the original minutes referring to this response, and promises to be more careful in the future.

2025-03: Nov 14, 2024 (*BCO* 8-7) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of the church.

Response [2026]: Presbytery agrees with the exception and is assured that the TE has full freedom to maintain and teach the doctrine of the church, has corrected its record by a motion to Amend Something Previously Adopted, has made a marginal notation in the original minutes referring to this response, and promises to be more careful in the future.

2025-04: Nov 14, 2024 (*BCO* 20-1) — No record of the reasons why Presbytery considers an out-of-bounds work to be a valid Christian ministry.

Response [2026]: Presbytery agrees with the exception and considers the out-of-bounds work a valid Christian ministry because the TE conducts Bible studies, engages in Evangelism, plans and conducts Christian retreats for business and college campus leaders, and also has the opportunity to administer the means of grace in Presbytery churches and assist with RUF at a campus

currently without a campus minister. The Presbytery has corrected its record by a motion to Amend Something Previously Adopted, has made a marginal notation in the original minutes referring to this response, and promises to be more careful in the future.

2025-05: Nov 14, 2024 (*BCO* 13-11) — Minutes of executive session not included.

Response [2026]: Presbytery respectfully disagrees with this exception since there was no executive session at the November 14, 2024, Stated Meeting, thus no executive session minutes were needed.

e. **Standing Judicial Commission (SJC) Compliance:**

North Florida Presbytery has not recorded the full decision in their minutes and/or has not provided a statement describing how the lower court has complied with any amends contained therein (*BCO* 40-2.4; *OMSJC* 17.1.e-f):

2024-05 — Bigelow v. North Florida

51. That the Minutes of **North Texas Presbytery:** *(64-0-0)*

a. Be approved without exception: **Feb 7–8, 2025; May 2–3, 2025; May 2–3, 2025 (ES); Aug 8–9, 2025; Nov 7–8, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Jul 26, 2025 (*BCO* 13-12) — No record of 10-day notice of called meeting stating the purpose.

2026-02: Jul 26, 2025 (*BCO* 13-12) — No record of meeting the minimum requirements of 3 TEs and 3 REs from 3 different churches requesting a called meeting of Presbytery.

52. That the Minutes of **Northern California Presbytery:** *(57-6-1)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **Aug 6, 2025**

c. **Be approved with exception of substance:**

2026-01: Feb 7, 2025 (*BCO* 18-8) — Men under care must be members of a PCA church.

2026-02: Feb 7, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery.

2026-03: May 2, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery.

2026-04: May 2, 2025 (*BCO* 38-1) — No evidence presbytery conferenced with the offended party in a case involving personal offense.

2026-05: May 2, 2025 (*BCO* 21-4.g.) — Presbytery did not require the candidate to state all specific instances in which he may differ with the Confession of Faith and Catechisms in any of their statements and/or propositions. Candidates stated views differ with SC 61 and LC 119, in addition to the portions of the Standards cited. The candidate stated, "I take exception to *WCF* 21.8 and corresponding *WLC* 117 and *WSC* 60

where the confession states that the "Sabbath is then kept holy unto the Lord, when men... observe an holy rest, all the day, from... recreations." Recreation can be refreshing, restful and good for us, if done properly. If we are to engage in recreation on the Sabbath, we should do it with gratitude, humility and grace, with our hearts directed toward God, trusting in him to provide for us and turning our hearts away from the selfishness and wickedness God warns of in Isaiah 58. We need to guard our steps (Isa. 58:13) and be careful not to do that which takes our delight away from the LORD. But that does not mean it is impossible for us to both guard our steps and take physical rest and downtime on the Sabbath, or to guard our steps and engage in grateful, God-glorifying recreation that brings rest. I believe it is possible to do both and keep the Sabbath holy.

2026-06: May 2, 2025 (*BCO* 19-2.f) — Presbytery did not require the candidate to state all specific instances in which he may differ with the Confession of Faith and Catechisms in any of their statements and/or propositions. Candidates stated view differs with LC 119 in addition to the cited portions of the Standards.

2026-07: May 2, 2025 (*BCO* 19-2.f.) — Presbytery failed to require explanation why the candidate's difference was merely with the recreation clause and not also with commerce prohibitions. (*WLC* 117-119). The candidate stated, “I take exception to the Westminster Confession 21.8 and the corresponding Larger Catechism Q. 117 and Shorter Catechism Q. 60 and Q. 61 where the Confession states that the sabbath is kept holy unto the Lord when worshippers "observe an holy rest, all the day, from... worldly... recreations." My exception is regarding the usage of the word "recreation". I affirm that Christians ought to keep the Sabbath holy unto the Lord by worshipping him—publicly and privately. Worship and rest are fundamental duties of a Christian on the Lord's Day, and is consistent with the scope of the fourth commandment. However, I believe the description of "recreation" in the Westminster Standards is not explicitly defined in the scriptures. Thus, I believe recreation is a matter of Christian liberty of conscience. For me, going on a walk or a hike on Sunday afternoon is restful, and for some ordering a meal from a restaurant is restful as it means taking a break from cooking.”

2026-08: May 2, 2025 (*BCO* 40-4; *BCO* 13-9.f.) — Having received a report that heretical opinion and corrupt practice were present in a worship service, and having received a letter of apology from the Session with authority over said service in which they confessed to "betraying Scripture and our standards," Presbytery failed to require said Session to inform the congregation of their error. In the worship service, a non-inspired poem was read in which God creates the world because he is lonely. "And God looked around and said: I'm lonely - I'll make me a world."

2026-09: Oct 3, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-03: Feb 2, 2024 (*BCO* 20-1) — No record of the reasons why Presbytery considers an out-of-bounds work to be a valid Christian ministry.

Response [2026]: Presbytery agrees with this exception. We failed to record the requirements in *BCO* 20-1 and *BCO* 8-7. Presbytery did review the call of the TE who will be working for a Reformed Missions Organization, and considers this Reformed Missions Organization a valid Christian ministry because the TE will be engaged in preaching and teaching the word, with full freedom to maintain and teach the doctrine of our Church. We apologize for the error and promise to be more careful in recording the requirements in *BCO* 20-1 and 8-7 in the future.

2025-04: Feb 2, 2024 (*BCO* 13-10) — No record of transfer or dismissal of members upon dissolving a church.

Response [2026]: The dissolved church's members were transferred to another local PCA church. We agree with the exception as we failed to record that in the minutes, so will amend the record, and be more careful in the future.

2025-05: Feb 2, 2024 (*BCO* 46-6) — No record of when a man who was transferred to another presbytery was received by that presbytery.

Response [2026]: Presbytery agrees with this exception, we failed to record in our minutes that this TE was received into another presbytery. He was received by the other presbytery, and we will seek to be more diligent in recording the transferring of TEs in our minutes in the future.

2025-06: Feb 2, 2024 (*BCO* 46-6) — No record regarding the reception of a certificate of dismission from transferring presbytery (May be accomplished through Clerks portal).

Response [2026]: Presbytery agrees with this exception, we failed to record in our minutes that these TEs were released by their presbytery. They were both received by our presbytery and released by their respective presbyteries, and we will seek to be more diligent in recording the transferring of TEs in our minutes in the future.

2025-07: Feb 2, 2024 (*PP* 6) — No record that members of temporary Session were called by the congregation.

Response [2026]: Presbytery agrees with this exception, we failed to record in our minutes that the temporary session was approved by the congregation. This church now has its own session, and the temporary session was dismissed with thanks. We will correct the record and be more careful in the future.

2025-08: May 3, 2024 (*BCO* 20-1) — No record of the reasons why Presbytery considers an out-of-bounds work to be a valid Christian ministry.

Response [2026]: Presbytery agrees with this exception. We failed to record the requirements in *BCO* 20-1 and *BCO* 8-7. Presbytery did review the call of the TE who will be working for a non-denominational Reformed church as an Associate Pastor and considers this church a valid Christian ministry because the TE will be engaged in preaching and teaching the word, with full freedom to maintain and teach the doctrine of our Church. We apologize for the error and promise to be more careful in recording the requirements in *BCO* 20-1 and 8-7 in the future.

2025-09: Jul 18, 2024 (*BCO* 46-6) — No record regarding the reception of a certificate of dismission from transferring presbytery (May be accomplished through Clerks portal).

Response [2026]: Presbytery agrees with this exception, we failed to record in our minutes that these TEs were released by their presbytery. They were both received by our presbytery and released by their respective presbyteries, and we will seek to be more diligent in recording the transferring of TEs in our minutes in the future.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-01: General 2024 (*BCO* 8-7; *BCO* 8-8) — No record of annual report(s) of TE(s) laboring out of bounds.

Response [2026]: Our Ministers and Churches Committee always update our presbytery of TEs laboring out of bounds at our annual presbytery meeting (October). We agree with the exception as we failed to record that in the minutes, so will amend the record, and be more careful in the future.

Rationale [2026]: No evidence that reports were secured from TEs laboring out of bounds. A Committee updating presbytery on the labors of out of bounds TEs does not satisfy the requirement that presbytery received reports from said TEs.

2025-02: General 2024 (*BCO* 13-2) — No record of annual report(s) of TE(s) without a call.

Response [2026]: Our Ministers and Churches Committee always update our presbytery of TEs without call at our annual presbytery meeting (October). We agree with the exception as we failed to record that in the minutes, so will amend the record, and be more careful in the future.

Rationale [2026]: No evidence that reports were secured from TEs without call. A Committee updating presbytery on the TEs without call does not satisfy the requirement that presbytery received reports from said TEs.

53. That the Minutes of **Northern Illinois Presbytery:** *(65-0-0)*

a. Be approved without exception: **Mar 26, 2025; May 13, 2025; May 13, 2025 (ES); Jul 22, 2025; Sep 12, 2025**

b. Be approved with exception of form: **Feb 1, 2025**

c. **Be approved with exception of substance:**

2026-01: Sep 13, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-02: Sep 13, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-06: Feb 23, 2023 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

Response [2025]: Presbytery agrees with the exception and will correct its record. The summary on pg. 66 “The Committee had received all necessary documentation and papers from the candidate,” was intended to cover all that had been done in Credentials Committee. All necessary details should have been explicitly enumerated. Presbytery promises to be more careful in the future.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not corrected the record and enumerated all required details.

Response [2026]: Presbytery agrees with the exception and has corrected its record by a motion to "Amend Something Previously Adopted," at its Stated Meeting 2/7/2026 that the PNI Credentials Committee had verified the candidate’s knowledge of Greek and Hebrew by seminary degree for his ordination examination February 23, 2023, and so had intended this to be included in sustaining the candidate’s examination as a whole. The change has been noted in the original record in PNI's 2023 Minutes at 23-22.d (pg. 67) by a marginal notation.

2024-07: Feb 23, 2023 (*BCO* 20-1; *RAO* 16-3.e.6) — Specific arrangements of call not shown to be approved.

Response [2025]: Presbytery agrees with the exception. Presbytery attempted to handle the Call Letter within the Credentials Committee in honor of the church’s request, and thus did not distribute the Call Letter, but approved it upon the Credentials Committee’s recommendation that the call was in order. Presbytery will be more careful in the future with regard to the approval of Call Letters.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not corrected the record to show that presbytery approved the arrangements of the call.

Response [2026]: Presbytery respectfully disagrees with the exception. The Credentials Committee of the presbytery had reviewed and

approved the specific arrangements of the call and so recommended the approval of the Call Letter to the Presbytery. The Presbytery approved the Committee's recommendation of the specific arrangements of the Call Letter as seen in the Minutes of the Called Meeting February 23, 2023, 23-22.h.

2024-08: Feb 23, 2023 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes, and these must be presented for review next year.

Response [2025]: Presbytery agrees with the exception and will append those minutes to the record and will supply the minutes of the commission for review by the Review of Presbytery Records of the 52nd General Assembly.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not provided the minutes of the commission for review.

Response [2026]: Presbytery agrees with the exception that the record was not corrected though the Commission minutes were sent to the RPR of the 52nd General Assembly.

Presbytery has corrected its record by a motion to "Amend Something Previously Adopted," adding the commission minutes in the minutes of the 2/7/2026 Stated Meeting and by a marginal notation in the original minutes of 5/9/2023 (pg. 72).

2024-09: May 9, 2023 (*BCO* 18-7) — Candidates dismissed from roll without record of informing former candidates.

Response [2025]: Presbytery agrees with the exception and will correct the record to show clearly that the former candidates were informed.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not corrected record.

Response [2026]: Presbytery agrees with the exception and has corrected its record by a motion to "Amend Something Previously Adopted," at its Stated Meeting 2/7/2026 that the Presbytery used what contact information that it had to share with the removed candidates that they had been dismissed from the PNI Roll when they were dismissed from the roll by action of the Presbytery at the Stated Meeting May 9, 2023. The change has been noted in the original record in PNI's 2023 Minutes at 23-36.d and 23-36.e (pg. 79) by a marginal notation.

2024-10: May 9, 2023 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes, and these must be presented for review next year.

Response [2025]: Presbytery agrees with the exception and will append those minutes to the record and will supply the minutes of the commission, including the referenced Report from the Commision and Letter of Confession, for review by the Review

of Presbytery Records of the 52nd General Assembly.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). No record Presbytery took action at a presbytery meeting in 2024 to append their commission's minutes to the appropriate presbytery meeting in 2023.

Response [2026]: Presbytery agrees with the exception that the record was not corrected though the Commission minutes, including the Report from the Commission and Letter of Confession were sent to the RPR of the 52nd General Assembly.

Presbytery has corrected its record by a motion to "Amend Something Previously Adopted," adding the Investigative Commission minutes, Report from the Commission and the Letter of Confession in the minutes of the 2/7/2026 Stated Meeting and noting this correction by a marginal notation in the original minutes of May 9, 2023, at 22-20.f Executive Session (pg. 85).

2024-11: Jul 25, 2023 (*BCO* 38-1; *RAO* 16-3.e.8) — Record of Case without process not recorded in minutes.

Response [2025]: Presbytery agrees with the exception and will append the Record of the Case without Process to the record and will supply the Record of the Case for review by the Review of Presbytery Records of the 52nd General Assembly.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). No record Presbytery took action on their commission's recommendations (commission meeting 5/9/23, appendix, nos. 1, 2).

Response [2026]: Presbytery has corrected its record by a motion to "Amend Something Previously Adopted," adding the Record of the Case Without Process in the minutes of the 2/7/2026 Stated Meeting and noting this correction by a marginal notation in the original minutes of July 25, 2023, at 23-41 (pg. 89).

2024-12: Sep 9, 2023 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

Response [2025]: Presbytery agrees with the exception regarding the incomplete record of the ordination exam and will correct the Record. The approval of the knowledge of Greek and Hebrew and the examination of his personal character were handled in the Credentials Committee, which should have been explicitly enumerated in the Record. However, the candidate stated no difference with Standards (pg 103 of Record), so the Presbytery is uncertain about RPR’s citation on views.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not corrected the record and enumerated the required details of the licensure exam that were not included in the existing Record.

Response [2026]: Presbytery agrees with the exception and has corrected its record by a motion to "Amend Something Previously Adopted," at its Stated Meeting 2/7/2026 that the PNI Credentials Committee had verified the candidate's knowledge of Greek and Hebrew by seminary degree for his ordination examination, had examined the candidate with regard to his personal character, and had examined the candidate with regard to his views on the PCA Constitution, toward his exams for ordination before the Presbytery on September 9, 2023, though these items had not been properly enumerated in the record. The change has been noted in the original record in PNI's 2023 Minutes at 23-56.h (pg. 103) by a marginal notation.

2024-13: Sep 9, 2023 (*BCO* 23-1) — No record of four fifths (4/5) majority vote of congregation on petition to request that an associate pastor succeed the senior pastor.

Response [2025]: Presbytery agrees with the exception and will correct the record. Presbytery's intention in recording that "The church brings the petition in accord with *BCO* 23-1," was to speak to the 4/5 requirement. This should have been explicitly stated. The Presbytery will be more careful in the future.

Rationale [2025]: No record that Presbytery corrected its action or record (*RAO* 16-10.b.1). Presbytery should correct the record to reflect the church's satisfaction of the supermajority requirement.

Response [2026]: Presbytery agrees with the exception and has corrected its record by a motion to "Amend Something Previously Adopted," at its Stated Meeting 2/7/2026, that the Presbytery had verified that the church met the requirement of a 4/5 majority vote by secret ballot (*BCO* 23-1). The change has been noted in the original record in PNI's 2023 Minutes at 23-56.i (pg. 104) by a marginal notation.

2025-01: General 2024 (*BCO* 18-6) — No record that reports on candidates' progress were received from candidates' instructors.

Response [2026]: Presbytery agrees with the exception and promises to be more careful in the future, having notified the presbytery's appropriate committee.

2025-02: General 2024 (*BCO* 18-6) — No record of annual report(s) of candidates.

Response [2026]: Presbytery agrees with the exception and our appropriate committee has taken steps to be more careful in the future.

2025-04: Jan 13, 2024 (*RAO* 14-2) — Election of commissioners requires action by presbytery or a commission of presbytery.

Response [2026]: Presbytery respectfully disagrees with the exception.

The Nominations Committee of the presbytery was empowered as a commission at its Stated Meeting 1/13/2024 "to fill the 51st General Assembly Committees of Commissioners slots for the PNI."

The Appendix H of the meeting minutes 5/14/2024 is the completed slate of Commissioners as filled by the Commissioned PNI Nominations Committee.

As RPR noted, the Clerk noted 2 openings early in the meeting. One, a TE for CTS CoC, was filled by vote of the presbytery during the Nominations Report later in the day.

Despite the fact that the April 12, 2024, report filing was past, The PCA Stated Clerk's office had encouraged the PNI Stated Clerk to fill all possible CoC slots past the April 12 deadline.

2025-05: May 14, 2024 (*BCO* 18-3) — No record candidates examined on motives for seeking ministry.

Response [2026]: Presbytery agrees with the exception and has corrected its record by a motion to "Amend Something Previously Adopted," at its Stated Meeting 2/7/2026 noting that the 6 candidates were examined by the PNI Credentials Committee on their motives for seeking ministry though the record of the PNI Stated Meeting, May 14, 2024 failed to state this fact.

The change has been noted in the original record in PNI's 2024 Minutes at 24-26.d (pg. 89) by a marginal notation.

2025-06: May 14, 2024 (*BCO* 18-2) — No record of endorsement by candidate's Session.

Response [2026]: Presbytery agrees with the exception and has corrected its record by a motion to "Amend Something Previously Adopted," at its Stated Meeting 2/7/2026 noting that the 6 candidates had received the endorsement of their respective Sessions though the record of the PNI Stated Meeting, May 14, 2024 failed to state this fact.

The change has been noted in the original record in PNI's 2024 Minutes at 24-26.d (pg. 89) by a marginal notation.

2025-07: May 14, 2024 (*BCO* 18-2) — No record of six months membership for candidates.

Response [2026]: Presbytery agrees with the exception and has corrected its record by a motion to "Amend Something Previously Adopted," at its Stated Meeting 2/7/2026 noting that the 6 candidates had been members of their respective churches for at least 6 months though the record of the PNI Stated Meeting, May 14, 2024 failed to state this fact.

The change has been noted in the original record in PNI's 2024 Minutes at 24-26.d (pg. 89) by a marginal notation.

2025-08: Sep 14, 2024 (*BCO* 18-2) — No record of six months membership

for candidates.

Response [2026]: Presbytery agrees with the exception and has corrected its record by a motion to "Amend Something Previously Adopted," at its Stated Meeting 2/7/2026 noting that the 2 candidates had been members of their church for at least 6 months though the record of the PNI Stated Meeting, May 14, 2024 failed to state this fact.

The change has been noted in the original record in PNI's 2024 Minutes at 24-26.d (pg. 89) by a marginal notation.

2025-09: Sep 14, 2024 (*BCO* 18-2) — No record of endorsements by candidates' sessions.

Response [2026]: Presbytery agrees with the exception and has corrected its record by a motion to "Amend Something Previously Adopted," at its Stated Meeting 2/7/2026 noting that the 2 candidates had received the endorsement of the Session of [Church Name Omitted] though the record of the PNI Stated Meeting, May 14, 2024 failed to state this fact.

The change has been noted in the original record in PNI's 2024 Minutes at 24-26.d (pg. 89) by a marginal notation.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-03: Jan 13, 2024 (*BCO* 15-1; *RAO* 16-3.e.4.) — Minutes of commission not entered in Presbytery minutes.

Response [2026]: Presbytery agrees with the exception and has corrected its record by a motion to "Amend Something Previously Adopted," adding the commission minutes in the minutes of the 2/7/2026 minutes and by a marginal notation in the original minutes of 1/13/2024 (pg. 68).

Rationale [2026]: Presbytery has not submitted the commission minutes for review.

54. That the Minutes of **Northern New England Presbytery:** *(62-0-0)*

a. Be approved without exception: **May 17, 2025; Oct 18, 2025; May 17, 2025 (ES)**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Feb 1, 2025 (*BCO* 13-8) — No record of examination of REs of a church received into Presbytery.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Feb 3, 2024 (*BCO* 15-2; *RAO* 14-2) — Presbytery gave commission-like power to a single individual to appoint representatives to a Committee of Commissioners. Representatives to Committees of Commissioners must be elected by Presbytery or a commission thereof.

Response [2026]: While the Northern New England Presbytery (NNEP) will modify our practice to ensure that any body so

empowered meets the requirements of *BCO* 15 for a commission, the NNEP respectfully disagrees with the Assembly's characterization of our action as granting commission-like power to an individual. Since representatives to Committees of Commissioners to past General Assemblies cannot be removed after the Assembly has met, and *RONR* (12th ed.) 37:9.2.e states that a motion which is impossible to undo cannot be reconsidered, NNEP believes that no additional corrective action is possible. NNEP notes that, prior to the Assembly's correction, NNEP took the same action in 2025 and understands that the Assembly's correction would also apply to it.

55. That the Minutes of **Northwest Georgia Presbytery:** *(63-0-0)*

a. Be approved without exception: **Jan 18, 2025; Jan 18, 2025 (ES); Apr 1, 2025**

b. Be approved with exception of form: **Aug 16, 2025**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*RAO* 14-2; *BCO* 15-2) — Appointing one or two men to fill positions on the committees of Commissioners of the General Assembly.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Jan 20, 2024 (*BCO* 38-3) — Presbytery dismissed a minister per *BCO* 46-6 as if he was being received by a NAPARC church rather than according to *BCO* 38-3, which would require a judgment about whether the receiving ecclesiastical body maintains the Word and sacraments in their fundamental integrity.

Response [2026]: The Presbytery agrees with the exception. The Presbytery has corrected its action and record by a motion to amend something previously adopted (*RONR* [12th ed.] 35:1; 48:15). In accordance with *BCO* 38-3.a the Presbytery adopted a motion that the withdrawal of a TE in good standing of the Presbytery to ECO be judged a withdrawal to a denomination that maintains the Word and Sacraments in their fundamental integrity, and therefore a true branch of the Church of Jesus Christ (*BCO* 2- 2). The Presbytery has made a marginal notation in the original minutes referring to this response. The Presbytery apologizes for its error and promises to be more careful in the future.

2025-02: Jan 20, 2024 (*BCO* 18-2) — No record of six months membership for candidate or sessional endorsement.

Response [2026]: The Presbytery agrees with the exception. The Presbytery has corrected its record by a motion to amend something previously adopted (*RONR* [12th ed.] 48:15). At the time of his application for candidacy the candidate had supplied testimonials from his endorsing Session certifying that he had

been a member of their congregation for greater than six months. The Presbytery has made a marginal notation in the original minutes referring to this response. The Presbytery apologizes for failing to originally record this in the minutes and promises to be more careful in the future.

2025-03: Jan 20, 2024 (*BCO* 46-6; *BCO* 13-7) — No record of when a man who was transferred to another presbytery was received by that presbytery

Response [2026]: The Presbytery agrees with the exception. The Presbytery has corrected its record by a motion to amend something previously adopted (*RONR* [12th ed.] 48:15). The TE in question was received into his new Presbytery on February 6, 2024. The Presbytery has made a marginal notation in the original minutes referring to this response. The Presbytery apologizes for failing to originally record this in its minutes and promises to be more careful in the future.

2025-04: Apr 16, 2024 (*BCO* 8-7; *BCO* 20-1) — Presbytery approved Out of Bounds Call for TE presiding in another presbytery without a record of other presbytery's approval.

Response [2026]: The Presbytery agrees with the exception. The Presbytery failed to confirm that the other Presbytery in question had concurred in the said TE's Out of Bounds Call in accordance with *BCO* 13-2. At the time of this response, the said TE has been offered a renewal of his Out of Bounds Call for a further year, the Presbytery has received assurance that will have full liberty to maintain and teach the doctrine of our Church (in accordance with *BCO* 8-7), and the Presbytery has approved the TE to labor in the Out of Bounds Call for a further year pending upon the concurrence of the other Presbytery in question. The Presbytery has submitted the details of that call to the Stated Clerk of the other Presbytery. At the time of this response, the Presbytery awaits the decision of that Presbytery whether they shall concur in the Out of Bounds Call or no. The Presbytery has made a marginal notation in the original minutes referring to this response and the irregularity of its initial approval of the Out of Bounds Call. The Presbytery apologizes for its error and promises to be more careful in the future.

2025-05: Apr 16, 2024 (*BCO* 46-6, 13-1) — No record of when a man was transferred into a presbytery was received by that presbytery.

Response [2026]: The Presbytery agrees with the exception. The Presbytery has corrected its record by a motion to amend something previously adopted (*RONR* [12th ed.] 48:15). The TE in question was received into his new Presbytery on February 6, 2024. The Presbytery has made a marginal notation in the original minutes referring to this response. The

Presbytery apologizes for failing to originally record this in its minutes and promises to be more careful in the future.

2025-06: Apr 16, 2024 (*BCO* 8-7, 13-2; *BCO* 20-1) — TE laboring out of bounds as stated supply no issued proper call or provide record of assurance he is able to "have full liberty to preach and teach the doctrines of our Church." No record the Presbytery is assured that an out-of-bounds TE with concurrence of Presbytery within whose bounds he labors.

Response [2026]: The Presbytery agrees with the exception. The Presbytery failed to confirm that the other Presbytery in question had concurred in the said TE's Out of Bounds Call in accordance with *BCO* 13-2. At the time of this response, the said TE has been offered a renewal of his Out of Bounds Call for a further year, the Presbytery has received assurance that will have full liberty to maintain and teach the doctrine of our Church (in accordance with *BCO* 8-7), and the Presbytery has approved the TE to labor in the Out of Bounds Call for a further year pending upon the concurrence of the other Presbytery in question. The Presbytery has submitted the details of that call to the Stated Clerk of the other Presbytery. At the time of this response, the Presbytery awaits the decision of that Presbytery whether they shall concur in the Out of Bounds Call or no. The Presbytery has made a marginal notation in the original minutes referring to this response and the irregularity of its initial approval of the Out of Bounds Call. The Presbytery apologizes for its error and promises to be more careful in the future.

e. **Standing Judicial Commission (SJC) Compliance:**

Northwest Georgia Presbytery has not met following the receipt of the SJC ruling. The review will be deferred to next year's Committee of Review of Presbytery Records (*BCO* 40-2.4; *OMSJC* 17.1.e-f).

2025-02 — Donovan et al v. Northwest Georgia

Northwest Georgia Presbytery recorded the full decision in their minutes and/or has provided a statement describing how the lower court has complied with any amends contained therein (*BCO* 40-2.4; *OMSJC* 17.1.e-f):

2024-17 — Whittle v. Northwest Georgia

56. That the Minutes of **Ohio Presbytery:** *(63-0-0)*

a. Be approved without exception: **Feb 1, 2025; May 3, 2025; Jul 30, 2025; Oct 4, 2025**

b. Be approved with exception of form: **None.**

c. Be approved with exception of substance: **None.**

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Feb 3, 2024 (*BCO* 39-2) — The members of the lower court were permitted to sit, deliberate, and vote on complaint against the actions of the lower court.

Response [2026]: The Ohio Presbytery agrees with this exception insofar as the Presbytery permitted members of a Session to sit, deliberate, and vote upon whether a Complaint concerning that Session was timely and in order. Because (1) the votes of the members of that Session (one TE and two REs) did not affect the outcome of that vote, (2) the matter was subsequently referred to a Commission to adjudicate the Complaint that did not contain any members of the lower court, and (3) the matter has been completely adjudicated at this time, it is not possible to correct this action of the lower court. Nevertheless, the Presbytery promises to be more careful in the future.

57. That the Minutes of **Ohio Valley Presbytery:** *(61-2-0)*

a. Be approved without exception: **May 20, 2025; Jul 26, 2025; Oct 21, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Jan 25, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery.

d. **That the following responses to the 53rd GA be found satisfactory:**

2023-05: Aug 18, 2022 (*BCO* 13-11) — Minutes of called meeting not included.

Response [2024]: With the dissolution of CMP, we will do better moving forward with providing this documentation as CMP churches are now a part of OVP.

Rationale [2024]: Minutes need to be submitted for review.

Response [2026]: Presbytery apologizes for its failure to submit these minutes of Columbus Metro Presbytery; they are included with the submission of this form.

2024-02: Mar 21, 2023 (*BCO* 18-2) — No record of endorsement by candidate's Session.

Response [2025]: We agree with this exception. CMP failed to obtain an endorsement from the church's session for the candidate as part of his under-care exam. We apologize for this oversight. As part of Ohio Valley Presbytery since July 2024, an endorsement always will be required in the future.

Rationale [2025]: Presbytery should confirm that the candidate has the endorsement of his session.

Response [2026]: Columbus Metro Presbytery (now merged with Ohio Valley Presbytery) did receive a letter of endorsement from the candidate's Session, but apologizes that we did not acknowledge it in or attach it with the Minutes. When the Minutes show that Presbytery waived *BCO* 18-2, it was meant to waive the requirement that a candidate be a member of the church endorsing him for six months due to his previous membership in PCA churches exceeding that period. We have

submitted the endorsement letter with this form.

2025-01: Jan 16, 2024 (*BCO* 20-1; *BCO* 23) — Presbytery did not approve change of call

Response [2026]: While Presbytery agrees that there is no record of a specific action approving the change in the TE's call (from Assistant Pastor to Associate Pastor in the same church) and will in the future make certain that the specific action approving such a change is recorded, we note that approval of the change was implicit in the appointment of the Commission to install the TE as an Associate Pastor. We also wonder why this particular matter constitutes a serious irregularity of the Constitution, as the definition of an exception of substance requires.

2025-03: May 7, 2024 (*BCO* 13-1; *BCO* 32-2; 38-2) — Presbytery, in dealing with a very difficult church situation, makes statements regarding sins on the part of one or more persons without having instituted process.

Response [2026]: Presbytery respectfully disagrees with this characterization of our action. The statements regarding sins on the part of a person involved were not made by Presbytery but by its Shepherding Committee in its report to Presbytery. In the absence of a written report, the oral report delivered by the Committee Chairman was summarized from his notes, recorded as "desirable for historical purposes" (*RAO* 16-3.f.1). The Chairman stated "In addition to these deficiencies, the Committee observed a lack of [the TE's] personal awareness of his own sin (specifically, his contribution to the issues at hand)." However, in its report the Committee listed only the cited deficiencies as his "contribution to the issues": a deficiency in resolving conflict, evidence of low emotional intelligence, lack of ability to create cohesive teams, evidence of avoiding accountability, ineffective personal behavior. While these constitute serious deficiencies in a leader, the record shows, by the action taken, that Presbytery judged them not to constitute offenses (*BCO* 29): "MSA to substitute the following for The Shepherding Committee's recommendation 1: to recommend that TE [name] resign from his call as pastor of [Name of Church] in order to correct deficiencies in the areas of competence identified in the Shepherding Committee report through a procedure to be established in consultation with the Shepherding Committee, which includes identifying specific sins growing out of those deficiencies in his relationships with the [Church Name Omitted] Ruling Elders and their families, repenting of those sins and demonstrating works in keeping with repentance." Note that the action (1) calls for the TE's correction of deficiencies in the areas of competence identified in the Shepherding Committee report and (2) in the process to

identify any as yet undetected sins and deal with them properly as outlined in Scripture and reflected in *BCO* 27-5.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-02: May 7, 2024 (*BCO* 21-4.f; *BCO* 57-1; 57-2) — Presbytery granted a doctrinal exception that appears to be hostile to the system of doctrine or strike at the vitals of religion. In the candidates own words, he says, "As regards who may partake of the Lord's Supper, I differ with the idea that the New Testament requires covenant children to make a profession of faith (an idea not explicitly stated in the Standards) or mature to the point of self-examination prior to being admitted to the Table. I believe covenant children should be welcomed to the Table of the Lord more or less when they join the table in their homes. Three biblical arguments persuade me of this view: the OT pattern of Passover and other sacrificial feasts, the dubious universalizing of 1 Corinthians 11:28, and the unity of signification between the Sacraments.1

First, it is clear that children partook, and were commanded to partake, of the Passover meal and other sacrificial feasts in the OT (Exod 12:24-27; Deut 12:11-12; 16:10-11), which are forerunners to the Lord's Supper much as circumcision is to baptism. The unity of the Covenant of Grace is a hallmark of Reformed thought. The Confession says that "The sacraments of the old testament, in regard of the spiritual things thereby signified and exhibited, were, for substance, the same with those of the new" (*WCF* 28.5). Given these points, there ought to be a presumption of continuity as to the recipients of the sacraments of nourishment (holy feasts/Lord's Supper) just as there is for the sacraments of initiation (circumcision/baptism).

Second, the chief warrant for seeing discontinuity at this point is Paul's injunction in 1 Corinthians 11:28: "Let a person examine himself, then, and so eat of the bread and drink of the cup." It is argued that in this verse Paul issues a universal prerequisite for all worthy partaking in the Lord's Supper. However, it is dubious whether this verse can be used in this way. The NT letters are occasional documents (1 Corinthians especially so), responding to concrete circumstances in first-century churches. Paul is clear in what he is addressing—exclusionary, factious, and elitist behavior toward fellow church members while ostensibly celebrating the Lord's Supper (1 Cor 11:18-20). Schismatic behavior that tears at the unity of the body profanes the unity of the bread and the participation in the body of Christ that partaking in the bread signifies (1 Cor 10:14-17). Lots of legitimate application can be made along these lines to the Church today. But to universalize the application of this passage is to take it too far. To deduce from it that Paul intended to set a minimum maturity threshold for participation in the Supper is, in my view, to stretch it beyond the

breaking point. Moreover, even if Paul's injunction to self-examination is taken as broadly as possible, the fact remains that there is a universal injunction to repent and believe prior to baptism for adults which (contrary to Baptists) we do not require of covenant children.

Third, Scripture teaches and our Standards affirm that baptism and the Lord's Supper fundamentally agree in their significance: "the spiritual part of both is Christ and his benefits; both are seals of the same covenant" (*WLC* 176). Oddly to my mind, Bavinck, and the Majority Report of the PCA on this subject with him, use this reality to assert the insignificance of withholding the Supper from young children. The children have baptism, the reasoning goes, so it's not a big deal if they don't get the Supper yet. But to my mind this point cuts precisely the other way. Since by baptism they already bear Christ's name, how can they be justly denied his bread? By what token are they granted the one-time sign of union with Christ while being denied the recurring sign of union with Christ? The unity of signification between the Sacraments compels me to think that the reasons for which we baptize our covenant children hold for the question of whether or not to commune our children as well."

Response [2026]: Presbytery respectfully disagrees that it has granted an exception regarding a difference with the Confession that is hostile to the system of doctrine of the Confession of Faith or striking at the vitals of religion, for the following reasons:

1. Since its organization in 2001 OVP has granted this exception on eight occasions, including the one in question. In addition, the Presbytery from which it was formed, Great Lakes Presbytery, granted the exception on at least three occasions. Concerning this exception, neither Presbytery has been cited before by the General Assembly as having granted an exception out of accord with our system of doctrine. It would seem inconsistent to do so now, and would call into question the standing of men who have been received or ordained by OVP over a period of years.

2. It is Presbytery's understanding that the provisions of *BCO* 21-4.f. and g. do not require Presbytery to agree with a difference to the Standards held by a candidate, but rather to judge whether or not his difference is out of accord with any fundamental of our system of doctrine because the difference is neither hostile to the system nor striking at the vitals of religion.

3. One of the instances when Presbytery granted this exception was the subject of a complaint that was taken to the *SJC*, and ultimately resulted in two separate cases (Cases 2014-01 and 2016-01). The *SJC* remanded the first of those cases to Presbtery, arguing that "the question before OVP and this Commission is not simply whether or not paedocommunion is

an allowable exception, but whether this particular formulation of that confessional difference, as developed in TE {name's} reasoning, is allowable, or whether it "strikes at the vitals of religion" or is "hostile to the system of doctrine. . . The question that must be addressed is whether this particular formulation of that difference justifies the granting of an exception." The *SJC* then sent a list of issues for the TE in question to address "to create a more comprehensive Record [of the Case]". When Presbytery had done so and reaffirmed its granting the exception, one of the original complainants filed a subsequent complaint, which the *SJC* denied. From this Presbytery concludes that the granting of an exception in this matter depends on the line of reasoning the man uses to support his difference.

4. The line of reasoning set forth by the candidate regarding his difference is grounded in covenant theology, which, as the *SJC* notes in Case 90-8, is a proper, and perhaps the best, way to refer to the system of doctrine contained in the Westminster Standards. In his statement regarding his difference, he notes that "The unity of the Covenant of Grace is a hallmark of Reformed thought" and quotes *WCF* 28.5: "The sacraments of the Old Testament, in regard of the spiritual things thereby signified and exhibited, were, for substance, the same with those of the new." He notes that, under the Old Testament, "It is clear that children partook, and were commanded to partake, of the Passover meal and other sacrificial feasts in the OT," and, applying the principle of *WCF* 28.5, argues that children of believers should be able to partake of communion. While OVP does not endorse this application of the principles of covenant theology, it has judged that this line of reasoning used to support it is not out of accord with any fundamental of our system of doctrine or the vitals of religion.

Rationale [2026]: Presbytery has not corrected its action (*RAO* 16-10.b.1). In response to the Presbytery's rationale: 1. The lack of citation in the past for granting an exception that "appears to be hostile to the system of doctrine" does not serve as adequate rationale for why this is not a citation of substance. 2. The Presbytery does not need to "agree with a difference" but must make a determination of whether the exception "is out of accord with any of the fundamentals of these doctrinal standards and, as a consequence, may not be able in good faith sincerely to receive and adopt the *Confession of Faith* and *Catechisms*" the citation from CRPR references incorrectly granting an exception, not agreement with the exception. 3. The rationale for the TE's exception is that the *Standards* do not "explicitly"

state that a covenant child "make a profession of faith." *WSC* 97 explicitly states that it is required of those who would worthily come to the table that they examine themselves… "of their faith to feed upon him, of their repentance, love, and new obedience." (see also *WLC* 171; 177). 4. The candidate's reasoning appears to pit portions of the *Standards* against itself. In other words, his appeal to *WCF* 28.5 needs to be made in such a way that does not undermine the remainder of the thought of the *Standards* which explicitly deny the exception taken by the candidate.

f. **Standing Judicial Commission (SJC) Compliance:**
Ohio Valley Presbytery has not met following the receipt of the SJC ruling. The review will be deferred to next year's Committee of Review of Presbytery Records (*BCO* 40-2.4; *OMSJC* 17.1.e-f).
2024-07 — PCA v. Columbus Metro
2024-20 — Fout v. Ohio Valley

58. That the Minutes of **Pacific Presbytery:** *(40-20-0)*
a. Be approved without exception: **None.**
b. Be approved with exception of form: **May 13, 2025**
c. **Be approved with exception of substance:**
2026-01: Jan 25, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.
2026-02: Jan 25, 2025 (*BCO* 21-4.c.1.a; *RAO* 16-3.e.5) — Incomplete record of ordination exam.
2026-03: Jan 25, 2025 (*BCO* 8-7) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our church.
2026-04: Jul 19, 2025 (*BCO* 21-4.f) — Presbytery granted a doctrinal exception that appears to be hostile to the system of our doctrinal standards. The candidate states, "I believe it's acceptable to have artistic or didactic images of Jesus, so long as they're not used in worship or for veneration. Since Jesus is the visible image of the invisible God (Col 1:15), I don't believe all depictions violate the second commandment when used appropriately." The candidate's differences with the 2nd Commandment (*cf.*, Ex 20:4), with regard to images of Jesus, are hostile to the system, specifically with his reference to the acceptability of "artistic" and "didactic" images of Jesus. With reference to artistic images, nothing in Scripture demonstrates any allowance for artistic images of any member of the Godhead. The common exception that this limitation only applies to worship misses the consistent biblical demonstration that when Jesus is recognized as a member of the Trinity, he is always, and only, given responses consistent with the 1st Commandment (*cf.*, Ex 20:3; Rv 1:17a)."
2026-05: Oct 7, 2025 (*BCO* 8-7) — Incomplete record of annual report(s) of

TE(s) laboring out of bounds.

2026-06: Oct 7, 2025 (*BCO* 13-2) — Incomplete record of annual report(s) of TE(s) without call.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 (*BCO* 40) — No record that churches with unreviewed minutes for 2022 and prior years had those minutes reviewed.

Response [2026]: We regret and apologize for having failed to record that minutes for 2022 and prior years had in fact been received, reviewed and recommended for approval. Pacific Presbytery hereby affirms this and has passed a motion to make a record of their review in the margins of the May 18, 2024, Stated Meeting Minutes, p. 18. We commit ourselves to avoiding such errors in the future.

2025-02: General 2024 (*BCO* 40) — Presbytery's Review of Sessions Records Committee reviewed the minutes of most sessions and sought the others. There is, however, no record of Presbytery acting on the Review Committee's recommendations, nor is there record of specific exceptions that were cited. Further, when one Session did respond to an exception there is no record of Presbytery acting to approve that response.

Response [2026]: "We regret and apologize for having failed to act upon the Review of Session Records Committee's recommendations at each stated meeting in 2024, and for not publishing exceptions taken to Session minutes by the Committee in their reviews. Pacific Presbytery hereby approves two recommendations:

That all minutes reviewed from 2022 and before be approved as recommended (see p. 18, the Minutes, May 18, 2024);

That all minutes received, reviewed, and exceptions sent for, churches listed on p. 18 and 19 of the Minutes, October 1, 2024, and a response to an exception taken for [Church Name Omitted], (p. 19), be approved.

The approved, two-part motion is recorded below. A notation of these retroactive approvals shall be placed into the May 18, 2024, p. 18, and October 1, 2024, Stated Meeting Minutes, pp. 18 & 19, respectively.

We commit ourselves to avoiding these errors in the future."

On motion, the presbytery approved all minutes reviewed from 2022 and prior (see p. 18, the Minutes, May 18, 2024), and further approved all minutes received, reviewed, and exceptions sent out for all the churches listed on pp. 18 and 19 of the Minutes, October 1, 2024, as well as a response to an exception taken for [Church Name Omitted], (p. 19).

2025-03: General 2024 (*BCO* 18-6; *BCO* 19-12) — No record of annual reports of candidates and interns, and no record of reports on interns at

each stated meeting.

Response [2026]: There was only one candidate and intern serving in Pacific Presbytery during 2024, [Name Omitted], who was a campus associate at [University Name Omitted]. He did issue reports during the RUFA Committee Report times at the January 30, 2024, and October 1, 2024, Stated Meetings, with a report given on his behalf during the RUFA Report time at the May 18, 2024, Stated Meeting while he was traveling in Japan. The records of all three meetings reflect this.

However, we acknowledge that these reports should have been filed as candidates and interns under the oversight of the Credentials Committee, and we apologize for this error and will make sure reports are filled by all candidates and interns properly and at every stated meeting in the future.

2025-04: Jan 30, 2024 (*BCO* 46-6; *BCO* 46-7) — No record of the Clerk sending a certificate of dismission (or portal entry) for a TE transferred to another PCA presbytery, and no record in subsequent minutes as to if or when the TE was received by the other presbytery.

Response [2026]: The reference here is to TE [Name Omitted], who transferred to the Catawba Presbytery of the Associate Reformed Presbyterian Church in March of 2024. He was released at the January 30, 2024, Stated Meeting of Pacific Presbytery, pending reception by the Catawba Presbytery, and Clerk TE [Name Omitted] did receive some correspondence on March 18, 2024, from Catawba Presbytery Stated Clerk [Name Omitted], informing him of their reception of TE [Name Omitted] at their March 12, 2024, Stated Meeting.

TE [Name Omitted] apologizes for this oversight and a note will be made in the margins of the stated clerk's report of Pacific Presbytery's May 18, 2024, Stated Meeting minutes indicating that TE [Name Omitted] was received into Catawba Presbytery of the ARP.

2025-05: May 18, 2024 (*BCO* 13-2) — A TE member of another PCA Presbytery is licensed and approved as stated supply in a church. There is no record that the other Presbytery was aware of this or gave their consent.

Response [2026]: TE [Name Omitted] of Arizona Presbytery was licensed at the May 18, 2024, Stated Meeting to serve as stated supply pastor at [Church Name Omitted]. Arizona Presbytery Stated Clerk TE [Name Omitted] was informed of this but Stated Clerk TE [Name Omitted] failed to place it into his report for the October 1, 2024, Stated Meeting.

TE [Name Omitted] apologizes for this oversight and a note will be made in the margins of the stated clerk's report of the Pacific Presbytery's October 1, 2024, Stated Meeting minutes

indicating that TE [Name Omitted] was informed of TE [Name Omitted] having been licensed by Pacific Presbytery on May 18, 2024. Every effort will be made to avoid this error in the future.

2025-07: Nov 26, 2024 (*BCO* 13-2; *BCO* 15-2; Preliminary Principle 6) — A teaching elder who is a member of another PCA Presbytery, albeit one who is licensed and approved as a stated supply in Pacific Presbytery, is made a member of a commission to function as the session of a church that has no pastor and only one ruling elder.

Response [2026]: TE [Name Omitted] of Arizona Presbytery was erroneously placed on an oversight commission for [Church Name Omitted] at a Called Meeting on November 26, 2024. This was in violation of Preliminary Principle # 6. We apologize for this error and will not commit it again. [Church Name Omitted] of [Town Name Omitted], California, has dissolved, and TE [Name Omitted] took a call in Southern Louisiana Presbytery and is now credentialed there."

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-06: Oct 1, 2024 (*BCO* 19-2.e,f; *BCO* 16-3.e.5) — A licentiate candidate's stated differences are given in his own words. The minutes then record "Mr. _____'s stated differences were judged, as amended, to be more than semantic…." There is no record of what amendments were made to the candidate's statement.

Response [2026]: We are not sure what happened here. Stated Clerk [Name Omitted] checked Mr. [Name Omitted]'s (now TE [Name Omitted]'s) originally submitted written exceptions to the Westminster Standards, and the wording is precisely the same as what was approved during his floor exams and is published in the October 1, 2024, Stated Meeting minutes. The words "as amended" must have been erroneously typed into the record. We apologize for the error this confusion caused, and we will be more careful in the future.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1).

59. That the Minutes of **Pacific Northwest Presbytery:** *(56-8-0)*

a. Be approved without exception: **Feb 7, 2025 (ES); Oct 9, 2025 (ES)**

b. Be approved with exception of form: **May 8–9, 2025**

c. **Be approved with exception of substance:**

2026-01: Feb 6–7, 2025 (*WLC* 168-177, *WCF* 27, 29, *WSC* 91, 96-97; *BCO* 57-1, 57-2, 58-2, *RAO* 16-3-e-7) — Presbytery granted a doctrinal difference that appears to be hostile to the system of doctrine by approving a man who holds to paedocommunion, stating, "I believe that covenant children who have been baptized should be admitted to

the Lord's Supper by virtue of their membership in the covenant. Despite holding this difference, I will continue to faithfully comply with the *BCO*'s requirements for a child to become a communing member before being admitted to the table."

2026-02: Oct 9–10, 2025 (*BCO* 18-3) — No record of candidates being examined on experiential religion and their motives for seeking the ministry.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-04: May 19, 2023 (*PP* 6) — No record that members of interim/provisional Session were called by congregation.

Response [2025]: We respectfully disagree with the citation that there is "no record that members of the interim/provisional Session were called by the congregation." Provisional Sessions are appointed by the Presbytery and do not require congregational approval. Specifically:

1. *BCO* 5-8 assigns the authority to the Presbytery to appoint a provisional Session for mission churches or other churches unable to function autonomously due to a lack of sufficient leadership. The church at hand had one ruling elder and no pastor.

2. *BCO* 12-1 requires that a Session consist of at least one Teaching Elder and one or more Ruling Elders, and so this church had no session. This meant that it is the Presbytery's responsibility to ensure proper oversight, either by appointing a provisional Session or through other means of support.

3. The congregation's role does not include calling or approving members of a provisional Session under the provisions of *BCO* 5-8 or *BCO* 13-1, as these actions fall under the jurisdiction of the Presbytery.

In this particular instance, the Presbytery acted within its authority to address the governance needs of the church by appointing members to an interim/provisional Session. While we acknowledge the importance of clearly documenting such actions in Presbytery minutes for the sake of clarity, the absence of congregational approval in this process is not a procedural error, as it is not required by the *BCO*.

We appreciate the Committee's diligence in reviewing our records and will endeavor to ensure that future minutes explicitly document the Presbytery's actions in appointing provisional Sessions for clarity and completeness.

Rationale [2025]: Presbytery did not address the issue raised by Preliminary Principle 6, which indicates that a presbytery does not have the power to elect persons to exercise authority in any particular church. See also *BCO* 16-2.

Response [2026]: The Presbytery respectfully disagrees with the

citation.

The PNWP fully affirms Preliminary Principle 6 and *BCO* 16-2, which safeguard the inalienable right of God's people to recognize by election those gifted to serve as officers and prohibit placing any man over a church in office without the election or consent of that church. These provisions govern the ordinary constitution of church officers and the normal exercise of congregational authority.

At the same time, neither a Preliminary Principle nor *BCO* 16-2 functions as an independent grant of power to a Presbytery. While they establish constitutional limits, they do not confer upon a Presbytery authority that is nowhere otherwise assigned to it by the Constitution. Nowhere does the Book of Church Order authorize a Presbytery to call a congregational meeting, nor does a Presbytery possess jurisdiction over a church's membership rolls or the practical means to convene the congregation directly.

Consequently, even if a Presbytery could call a congregational meeting, it would be exercising authority over members of a local church, though no members of the Presbytery were elected to that particular society to exercise that authority. The very act of attempting to avoid the violation of Preliminary Principle 6 would itself be a violation of that same principle.

The rare circumstances featured the resignation of the only Ruling Elder at a time that the church had no Teaching Elder. In the absence of a Session, the congregational election or consent contemplated by *BCO* 16-2 could not be initiated. The Presbytery therefore faced a circular impasse: no officers could be elected without a congregational meeting, and no congregational meeting could be lawfully called without a Session.

In these extraordinary circumstances, the Presbytery appointed a temporary Session as a remedial and transitional measure. This action was taken not to supplant congregational authority, but to restore ordinary governance so that the congregation could again exercise its rights under *BCO* 16-2. Once a Session was in place, the elders could lawfully call a congregational meeting in accordance with *BCO* 25-2, or the congregation could demand one (*BCO* 25-2; *BCO* 43), at which the congregation could affirm the appointed elders or elect others from its own number. Any such action would be recorded in the Session minutes of the church and reviewed by the Presbytery.

The Presbytery maintains that its action did not violate Preliminary Principle 6 or *BCO* 16-2, but rather preserved their substance by restoring the congregation's ability to govern

itself through its elders.

Furthermore, we believe our initial response, rather than RPR's understanding, fully comports with the *SJC*'s October 16, 2025 Decision - and its Reasoning - in Case 2024-20: Complaint of Fout v. Ohio Valley Presbytery. The Case Summary in Fout reads:

"Complainants contend that Ohio Valley Presbytery ("OVP") erred by appointing a commission to act as a temporary Session of [Church Name Omitted] after the ruling elders of [Church Name Omitted] resigned, leaving it without a Session. Complainants assert that OVP was required to obtain the consent of the [Church Name Omitted] congregation before appointing the temporary Session. We find no error in OVP's actions and therefore deny the Complaint."

The Fout Decision will be in the *SJC*'s Report to the 2026 GA.

The Presbytery appreciates the Committee's careful review of this difficult matter.

2024-15: General 2023 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes, and these must be presented for review next year.

Response [2025]: We have received and reviewed the citation regarding the General 2023 minutes, which noted that the minutes of a commission were not entered into the Presbytery minutes, as required by *BCO* 15-1 and *RAO* 16-3.e.4.

However, the citation does not specify which commission is being referred to. We respectfully request that the Committee on Review of Presbytery Records clarify which commission and associated minutes are in question so that we can investigate and take the appropriate corrective action.

We remain committed to maintaining accurate and complete records and will gladly address this matter once the specific details are provided.

Rationale [2025]: Minutes of standing commission to approve Presbytery's minutes not recorded.

Response [2026]: The Presbytery acknowledges the citation regarding the absence of submitted commission minutes approving Presbytery minutes.

The Coordinating Committee, acting with authority as a commission of Presbytery pursuant to the Standing Rules, did approve the Presbytery minutes on the dates reflected in the headers of the 2023 minutes. However, separate commission minutes recording those actions were not included in the materials submitted for review.

To correct this omission, the Presbytery has amended the Clerk's Reports in the subsequent stated meeting minutes to

include nunc pro tunc commission minutes recording the approval of the following Presbytery minutes:

February 2–3, 2023 (approved March 11, 2023)

May 18–19, 2023 (approved June 23, 2023)

October 12–13, 2023 (approved November 18, 2023)

These amendments now provide a complete and reviewable record of the commission's actions. The Presbytery regrets the omission and will ensure that commission minutes approving Presbytery minutes are clearly recorded and submitted going forward.

The Presbytery thanks the Committee for its careful review and assistance in maintaining accurate records.

2025-01: General 2024 (*BCO* 8-4, 8-7, 8-8; *BCO* 13-2) — No record of annual report(s) of TEs laboring in needful works, out of bounds, as chaplains, or those without call.

Response [2026]: We regret that we did not record in our minutes the status of annual reports from TEs who are obliged to file them. Below is a report from our Ministers & Churches Committee regarding the 2024 annual reports of 14 TEs, which includes 2 chaplains, 10 laboring out of bounds, and 2 without call.

Note – these names reflect the 2024 rolls, not the current rolls of our TEs without call or laboring as chaplains of out of bounds. Also, at the time of the 2024 annual reports, there were additional reports received from TEs who have subsequently either been changed to honorably retired or transferred to other presbyteries.

2025-02: Feb 1–2, 2024 (*BCO* 19-2.e–f) — No record of requiring statement of differences with our Standards.

Response [2026]: The Presbytery acknowledges the citation and regrets the omission in the minutes.

At the February 1–2, 2024 meeting, the Presbytery did require the candidate to state any differences with the Westminster Standards in accordance with *BCO* 19-2.e–f. The candidate stated that he had no differences with the Standards. This portion of the examination was conducted as required but was inadvertently omitted from the recorded minutes.

The Presbytery apologizes for this oversight. The minutes have now been amended to reflect the examination accurately. The Presbytery is grateful for the careful work of the Review of Presbytery Records Committee and will exercise greater care going forward to ensure that all required elements of candidate examinations are clearly and fully reflected in the record.

2025-03: May 16–17, 2024 (*BCO* 13-6; *BCO* 21-4.f–g) — No record of requiring statement of differences with our Standards.

Response [2026]: The Presbytery acknowledges the citation and

regrets the omission in the minutes.

At the February 1–2, 2024 meeting, the Presbytery did require the candidate to state any differences with the Westminster Standards in accordance with *BCO* 19-2.e–f. The candidate stated that he had no differences with the Standards. This portion of the examination was conducted as required but was inadvertently omitted from the recorded minutes.

The Presbytery apologizes for this oversight. The minutes have now been amended to reflect the examination accurately. The Presbytery is grateful for the careful work of the Review of Presbytery Records Committee and will exercise greater care going forward to ensure that all required elements of candidate examinations are clearly and fully reflected in the record.

2025-04: Oct 10–11, 2024 (*BCO* 19-1) — No record of examination of licensure for stated supply who was a member of another PCA Presbytery.

Response [2026]: The Presbytery acknowledges the citation and regrets the deficiencies in the minutes.

At the October 10–11, 2024 meeting, the Presbytery did examine a TE from Central GA Presbytery for licensure in accordance with *BCO* 19-1 to serve as a the stated supply. In light of the candidate's prior service and experience TE having been ordained in and having served in the PCA for 42 years, the examination was brief. During the examination, the candidate minister stated one difference with the Westminster Standards, which he read aloud. The Presbytery judged the difference to be merely semantic.

While the examination was conducted as required, the minutes failed to record that the examination took place and also failed to record the stated difference in the candidate's own words. The Presbytery recognizes that both should have been included. The candidate's statement is unrecalled and not reproducible.

The Presbytery apologizes for these oversights. The minutes have now been amended to reflect the examination and the Presbytery's judgment. Going forward, the Presbytery will take greater care to ensure that examinations for licensure are fully and accurately reflected in the minutes, including the clear recording of any stated differences in the candidate's own words. The Presbytery is grateful for the careful work of the Review of Presbytery Records Committee in helping maintain faithful and accurate records.

60. That the Minutes of **Palmetto Presbytery:** *(59-2-1)*

a. Be approved without exception: **Nov 13, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*RAO* 16-10.a) — No record in minutes of exceptions taken by GA.

2026-02: General 2025 (*RAO* 16-4.c.2) — Presbytery Standing Rules not submitted for review.

2026-03: Feb 13, 2025 (*BCO* 15-2; *RAO* 14-2, 15-2) — Motion approved to empower the Stated Clerk to fill Committee of Commissioners appointments. Committee of Commissioners must be elected by the Presbytery

2026-04: May 8, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session.

2026-05: May 8, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-06: May 8, 2025 (*BCO* 18-2) — An applicant for care may not be received under care and examined for ordination at the same meeting of the Presbytery.

2026-07: May 8, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session.

2026-08: May 8, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session.

2026-09: May 8, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session.

2026-10: May 8, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-11: May 8, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

2026-12: Aug 14, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-13: Aug 14, 2025 (*BCO* 46-8) — No record of assignment of former minister to membership in some particular church, subject to the approval of the Session of that church.

2026-14: Aug 14, 2025 (*BCO* 21-4) — No record of requiring statement of differences with our Standards.

2026-15: Sep 10, 2025 (*BCO* 13-12) — No record of 10-day notice for called meeting.

2026-16: Sep 10, 2025 (*BCO* 13-6.c) — No record of requiring statement of differences with our Standards

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 (*BCO* 19-12) — Annual report of interns not included.

Response [2026]: Palmetto Presbytery agrees with the exception of having failed to obtain a specific annual report of interns in 2024 (*BCO* 19-12). As a mitigating factor, we may have been confused as all interns made quarterly reports and the Candidates Committee apparently considered that to be sufficient. We now understand that an annual Internship report

is in addition to the four quarterly internship reports. We apologize for the error and have instructed our Candidates Committee to ensure all interns make the required reports in the future including a 2025 Annual Report. To correct the 2024 error, the committee will use the interns' 2024 quarterly reports and compile an annual report for each intern, and we will amend the 2024 presbytery records to include the missing annual 2024 reports. An annual report for 2025 has already been received and will be reviewed by the Presbytery at its February 2026 meeting. We will ask Sessions to assist our Candidates Committee in enforcing that interns under their care comply with the reporting requirements, and we will be more careful in the future to insure all *BCO*-mandated internship reports are received and published, including reports from their instructors as their progress.

2025-02: General 2024 (*BCO* 8-7) — No record of annual reports of TEs laboring out of bounds.

Response [2026]: Palmetto Presbytery agrees with the exception of our having failed to obtain annual reports of some of our Teaching Elders (TEs) who Labored Out of Bounds (*BCO* 8-7) in 2024. The specific citation lists seven TEs who failed to make reports. These seven men have been contacted and asked to retroactively comply to the requirement and send in an annual report of their labors for both 2024 and 2025.

To ensure this oversight is corrected in the future, Presbytery directs the chairman of the Church and Ministerial Health Committee (CMH), per Palmetto Presbytery Bylaws, to be responsible for obtaining these *BCO*-mandated annual reports. Those failing to submit the required reports will be subject to Presbytery citation and discipline. When new men come into the Presbytery and are assigned LOB status they will be specifically instructed by the Moderator and Stated Clerk of this annual requirement and urged to comply. The annual reports by those who are laboring Out of Bounds (LOB) will be due to the Chair of the CMH Committee no later than October 15 of each year so that the reports can be part of the annual November meeting of Presbytery.

61. That the Minutes of **Pee Dee Presbytery:** *(63-0-0)*

a. Be approved without exception: **Feb 13, 2025; Apr 26, 2025; Jul 26, 2025; Oct 23, 2025**

b. Be approved with exception of form: **None.**

c. Be approved with exception of substance: **None.**

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Jan 27, 2024 (*BCO* 13-6; 19-1) — Transferring TE is listed as

undergoing licensure exam.

Response [2026]: We agree this was listed as a licensure exam in error. This was a scrivener's error on our part. Transferring TE did undergo transfer exam per *BCO* 13-6. The record has been amended to correct the error.

2025-02: Apr 27, 2024 (*BCO* 38-3) — No record that presbytery made determinations required by *BCO* 38-3.

Response [2026]: We respectfully disagree with the exception. Our minutes (excerpted below) clearly record our determination under *BCO* 38-3.

[Excerpt from April 27, 2024 minutes]

Amendment to Main Motion Per *BCO* 38-3.b Immediately enact the discipline process to remove TE [name omitted] from the rolls of Pee Dee Presbytery due to breaking his ordination vows by his affiliation with a body judged as failing to maintain the fundamental integrity of the Word and Sacraments in accordance with *BCO* 2-2 and his persistent failure to address after repeated warnings. **Yea 27 Nay 0 Abstain 0**

2025-03: Jul 27, 2024 (*BCO* 46-6; 13-7) — No record of when a man who was transferred to another presbytery was received by that presbytery.

Response [2026]: We agree we missed reflecting the portal change in the minutes. This transfer was completed May 7, 2024 into Metro Atlanta Presbytery and is clarified in the 10-23-25 Minutes.

62. That the Minutes of **Philadelphia Presbytery:** *(64-0-0)*

a. Be approved without exception: **Jan 18, 2025 (ES); Mar 15, 2025 (ES); May 17, 2025 (ES); Sep 19, 2025 (ES)**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*RAO* 16-10.a) — No response to the Assembly concerning disposition of an Exception of Substance.

2026-02: General 2025 (*RAO* 16-3.b) — Minutes not neat and legible. Minutes regularly lack page numbers.

2026-03: General 2025 (*BCO* 13-9.b; *BCO* 40-1) — No record of review of records of church Sessions.

2026-04: General 2025 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

2026-05: General 2025 (*BCO* 13-2) — No annual reports of TEs without call.

2026-06: General 2025 (*BCO* 18-6) — No annual reports from candidates and their instructors.

2026-07: General 2025 (*BCO* 19-12) — No regular reports on interns, nor annual reports from interns.

2026-08: General 2025 (*BCO* 46-6; *BCO* 38-3) — TEs absent from roll without record of divestment, deposition, transfer, or withdrawal by

affiliation under *BCO* 38-1.

2026-09: Jan 18, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session and six months membership for candidate.

2026-10: Jan 18, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-11: Jan 18, 2025 (*BCO* 8-7) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church.

2026-12: Jan 18, 2025 (*BCO* 8-7) — No record that out-of-bounds TE is engaged in preaching and teaching the Word.

2026-13: Jan 18, 2025 (*BCO* 20-1) — No record of the reasons why Presbytery considers an out-of-bounds work to be a valid Christian ministry.

2026-14: Jan 18, 2025 (*BCO* 40-5) — Improper adjudication of 40-5 request.

2026-15: Mar 15, 2025 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of exam for minister seeking admission from another denomination.

2026-16: Mar 15, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-17: Mar 15, 2025 (*BCO* 20-1) — No record of the reasons why Presbytery considers an out-of-bounds work to be a valid Christian ministry.

2026-18: Mar 15, 2025 (*BCO* 8-7) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church.

2026-19: Mar 15, 2025 (*BCO* 8-7) — No record that out-of-bounds TE is engaged in preaching and teaching the Word.

2026-20: Mar 15, 2025 (*BCO* 23-1) — No record that Session was cited to appear before Presbytery.

2026-21: Mar 15, 2025 (*BCO* 38-3) — No record that presbytery made determinations required by *BCO* 38-3.

2026-22: May 17, 2025 (*BCO* 38-3) — No record that presbytery made determinations required by *BCO* 38-3.

2026-23: May 17, 2025 (*BCO* 40-5) — Presbytery mischaracterized 40-5 report as a mixture of charges and complaint, and failed to make a determination on the matters alleged in the report.

2026-24: May 17, 2025 (*BCO* 38-1) — No evidence that presbytery followed procedure for personal offenses.

2026-25: May 17, 2025 (*BCO* 38-1; *BCO* 30-3) — Improper adjudication of case without process. Presbytery must approve of the confession before proceeding to judgment. Presbytery must impose a constitutionally applicable censure.

2026-26: Jul 31, 2025 (*BCO* 13-12) — Only two churches represented among men who requested called meeting.

2026-27: Sep 19, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session and six months membership for candidate.

2026-28: Sep 19, 2025 (*BCO* 18-3) — Presbytery did not examine applicants in experiential religion and motives for seeking the ministry.

2026-29: Sep 19, 2025 (*BCO* 38-2) — Divestment without censure improperly handled.

2026-30: Dec 04, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-02: May 18, 2024 (*BCO* 15-2) — Motion that the moderator is empowered to appoint a Committee of Commissioners to the 2024 General Assembly for those who desire to serve in this capacity. m/s/a by unanimous vote.

Response [2026]: Presbytery agrees, in principle, with this exception. RPR should know that the Philadelphia Presbytery did not appoint any Commissioners for the 2025 General Assembly under these procedures. In order to be more careful in the future and in agreement with RPR, in the future, we only appoint men by: (1) All appointees approved by our May Stated Meeting, (2) Any nominations be part of a Called Meeting of Presbytery prior to GA, and/or, (3) vote to allow the CT to act as a Standing Commission after the May Stated meeting to execute any last minute requests [which we approved later at this Stated Meeting].

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2023-03: Jan 15, 2022 (*BCO* 13-9.b; 40-1) — Presbytery did not fulfill its constitutional duty to review session records when it declined to review 2019 and 2020 minutes.

Response [2024]: The Philadelphia Presbytery has been reviewing past Session Records, and will approve a new process at the January 2024 meeting that will ensure Session Records are reviewed in an expedited manner.

Rationale [2024]: No evidence the Presbytery has been reviewing these minutes.

Response [2025]: That the Philadelphia Presbytery direct the Stated Clerk to amend the minutes of the January 15, 2023 as previously adopted to include the following: The Philadelphia Presbytery agrees that we have not yet read and approved the 2019 and 2020 minutes, but our inaction does not mean that we are refusing to approve them. We have been overwhelmed with several time-consuming disciplinary cases over the past year that has occupied our time and manpower. The Presbytery is committed to processing these minutes as directed by RPR. The Presbytery thus directs the Stated Clerk to make a marginal notation at the point of error in the original minutes, directing readers to where they may find the correction. Also, at the

March 15, 2025 Stated Meeting the following motion was passed: Whereas the PCA General Assembly has cited the Philadelphia Presbytery for failing to review its Sessions' Record for the years 2018 and 2020, 2021, and 2023 Whereas the Book of Church Order (*BCO*) 40-1 requires the Presbytery to review the records of every session subject to its jurisdiction yearly, Whereas the Philadelphia undertook a review of the records of its sessions for the years 2019 and 2023 and that these reviews were made by two persons for each session and considered matters of form and substance, The Coordinating Team proposes that it create a committee of elders to review the session records for the years 2019, 2020, 2021 and 2022 in the following manner: Each Session's records for these years would be reviewed by only one reviewer. The reviewers would focus on identifying possible instances of gross non-compliance with our constitutional standards, not on exceptions of form or minor exceptions of substance which may have been reported in the 2023 review of Session records. The committee is asked to issue its report to the Presbytery by October 31, 2025. The committee would consist of [Names Omitted] was added. M/s/a by unanimous vote.

Rationale [2025]: Committee recognizes the challenges each Presbytery faces but timely and thorough review of the records of church Sessions are required, essential and an important distinction of the Presbyterian Church in America. Presbytery must also record in their minutes that they reviewed Session Minutes for years 2019 and 2020.

Response [2026]: Presbytery agrees with this exception. We apologize for our delay and dereliction of duty. At its March 21, 2026 Stated Meeting Presbytery recognized and commended the following churches for submitting all relevant minutes – 2019, 2020, 2021, 2022, 2024 and 2025: [Church Names Omitted]. Presbytery is moving forward with reviewing these minutes. We will cite other churches to appear before Presbytery if they do not submit these minutes in an expedited manner. We are determined to complete the necessary review of Session minutes.

Rationale [2026]: Presbytery has not recorded in its minutes that it has reviewed the 2019 and 2020 minutes. While it is good that Presbytery has taken action to review these records at their March 2026 meeting, Presbytery's response will continue to be unsatisfactory until the minutes are reviewed.

2024-01: Mar 18, 2022 (*BCO* 43-3) — Complaint from lower court (church Session) not included in regular meeting minutes or executive session minutes.

Response [2025]: This was an oversight. These Executive Session Minutes will be included in the 2024 Executive Session packet for the 52nd General Assembly.

Rationale [2025]: A clerical error occurred in the preparation of the response form: the Presbytery was provided with an incorrect exception entry. The Presbytery submitted a thoughtful and timely response to the item as presented, but it did not correspond to the actual exception noted in the report approved by the 51st General Assembly. The Secretary of the CRPR apologizes for the mistake and regrets the confusion caused. The Presbytery shall submit a response to the correct exception to the 53rd General Assembly.

Response [2026]: Presbytery agrees with this exception. We apologize for our oversight of not including the Complaint in the minutes. Presbytery will direct the Stated Clerk to correct its record and amend what was previously adopted, and will make a marginal notation in the original minutes referring to
this response. The Stated Clerk will insert the Complaint in the Executive Session minutes as directed by RPR. We will be more careful in the future.

Rationale [2026]: Complaint not included in 2025 minutes. Presbytery must include the original complaint from the Mar 18, 2023 meeting in its records, and submit said records for review.

2024-02: General 2023 (*BCO* 13.9.b; *BCO* 40-1) — No record of review of records of church sessions.

Response [2025]: From the March 15, 2025 Stated Meeting:

Whereas the PCA General Assembly has cited the Philadelphia Presbytery for failing to review its Sessions' Record for the years 2018 and 2020, 2021, and 2023 Whereas the Book of Church Order (*BCO*) 40-1 requires the Presbytery to review the records of every session subject to its jurisdiction yearly, Whereas the Philadelphia undertook a review of the records of its sessions for the years 2019 and 2023 and that these reviews were made by two persons for each session and considered matters of form and substance, The Coordinating Team proposes that it create a committee of elders to review the session records for the years 2019, 2020, 2021 and 2022 in the following manner: Each Session's records for these years would be reviewed by only one reviewer. The reviewers would focus on identifying possible instances of gross non-compliance with our constitutional standards, not on exceptions of form or minor exceptions of substance which may have been reported in the 2023 review of Session records. The committee is asked to issue its report to the Presbytery by October 31, 2025. The committee would consist of TE [Name Omitted], TE [Name

Omitted] and TE [Name Omitted], [Name Omitted]'s name was added. M/s/a by unanimous vote.

Rationale [2025]: Each Presbytery is required under *BCO* 40-1 to review all Session minutes at least on a yearly basis. The continued failure to fully review Session minutes for the years 2019, 2020, 2021 and 2022 reflects a serious dereliction of duty. The solution suggested by the Presbytery does not appear to reflect the intent and spirit of the *BCO* 40-2 which requires a thorough examination of Session minutes and not simply reviewing only for gross noncompliance of constitutional standards.

Response [2026]: Presbytery agrees with this exception. We apologize for our delay and dereliction of duty. At its March 21, 2026 Stated Meeting Presbytery recognized and commended the following churches for submitting all relevant minutes – 2019, 2020, 2021, 2022, 2024 and 2025: [Church Names Omitted]. Presbytery is moving forward with reviewing these minutes. We will cite other churches to appear before Presbytery if they do not submit these minutes in an expedited manner. We are determined to complete the necessary review of Session minutes.

Rationale [2026]: Presbytery has not yet reviewed session records for 2019, 2020, 2021, and 2022. Presbytery is seriously derelict in its duty to annually review the records of the court next below. While it is good that Presbytery has taken action toward the review of Session records at their March 2026 meeting, their response will remain unsatisfactory until all above minutes are reviewed.

2025-01: Jan 20, 2024 (*BCO* 13-6) — Incomplete examination of TE transferring into Presbytery

Response [2026]: Presbytery agrees with this exception. We apologize for our oversight. Presbytery did examine the man in all the areas required and simply failed to record the relevant area of *RAO* 16-10.b.2. Presbytery will direct the Stated Clerk to correct its record and amend what was previously adopted, and will make a marginal notation in the original minutes referring to this response. We will be more careful in the future."

Rationale [2026]: No evidence minutes have been corrected. Presbytery notes that it will take action to correct the matter, but does not note that the relevant correction has been made, nor what the specific correction is.

2025-03: Sep 21, 2024 (*PP* II.6) — No record that members of the interim/provisional Session were called by the congregation

Response [2026]: Presbytery agrees with this exception. This was an oversight of recording what actually transpired. There was no

violation of Preliminary Principle 6 in practice. We apologize for any confusion. Presbytery will direct the Stated Clerk to correct its record and amend what was previously adopted, and will make a marginal notation in the original minutes referring to this response. We will be more careful in the future.

Rationale [2026]: No evidence minutes have been corrected. Presbytery notes that it will take action to correct the matter but does not note that the relevant correction has been made, nor what the specific correction is.

2025-04: Sep 21, 2024 (*BCO* 30; *BCO* 34-4) — A teaching elder is censured, but the specific censure is not recorded in the minutes.

Response [2026]: We apologize for the omission. There was indeed a censure imposed, but not clearly communicated. Presbytery will direct the Stated Clerk to correct its record and amend what was previously adopted, and will make a marginal notation in the original minutes referring to this response consistent with *BCO* 36. We will be more careful in the future.

Rationale [2026]: No evidence minutes have been corrected. Presbytery notes that it will take action to correct the matter but does not note that the relevant correction has been made, nor what the specific correction is.

f. **That the General Assembly:**

Cite Philadelphia Presbytery to appear by its representative before the Committee on Review of Presbytery Records at its 2027 meeting (date to be determined by the Administrative Committee) with responses to the 53rd General Assembly. If the Presbytery desires, the Presbytery may appoint its representative to also act as its representative to serve on the RPR committee.

63. That the Minutes of **Philadelphia Metro West Presbytery:** *(63-0-0)*

a. Be approved without exception: **Feb 22, 2025; May 3, 2025; Jul 31, 2025; Sep 20, 2025; Sep 20, 2025 (ES); Nov 18, 2025; Nov 18, 2025 (ES)**

b. Be approved with exception of form: **None.**

c. Be approved with exception of substance: **None.**

64. That the Minutes of **Piedmont Triad Presbytery:** *(61-0-0)*

a. Be approved without exception: **Feb 1, 2025 (ES); May 20, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

2026-02: Feb 1, 2025 (*BCO* 15-2; *RAO* 14-2, 15-2) — Motion approved to empower the Moderator to fill remaining [Committee of Commissioners] appointments. Committee of Commissioners must be elected by the Presbytery.

2026-03: May 8, 2025 (*BCO* 18-3) — No record of examination on experiential religion and on his motives for seeking the ministry.

2026-04: May 8, 2025 (*BCO* 13-6) — Incomplete record of examination of TE transferring into Presbytery

2026-05: Aug 9, 2025 (*BCO* 21-4.e; *RAO* 16-3.e.5) — No/Incomplete record of ordination exam.

2026-06: Nov 13, 2025 (*BCO* 13-9.a; *BCO* 13-9.c) — Incomplete record of discipline case.

2026-07: Nov 13, 2025 (*BCO* 43-2) — The court considered the complaint at the meeting it was received, instead of later meeting (no notice from the court).

2026-08: Nov 13, 2025 (*BCO* 43-2) — The court considered the complaint at the meeting it was received, instead of later meeting (no notice from the court).

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-02: Feb 10, 2024 (*BCO* 21-4; *RAO* 16-3.e.6) — Presbytery incorrectly judged a candidate's stated difference as merely semantic. Minute reads: " I would take more of the continental reformers view that part of the Sabbath can be spent in recreation. After church, going to a game, or taking a trip to the mountains, etc."

Response [2026]: Upon further review, we agree with the General Assembly and should have judged this view as "more than semantic but not striking at the system or vitals of religion. " The change has now been noted in our minutes and communicated to the candidate.

2025-03: May 11, 2024 (*BCO* 21-4; *RAO* 16-3.e.6) — Presbytery incorrectly judged a candidate's stated differences as merely semantic.

First minute read: "I have a perceived difference with the *WCF* 4.1 (cf. also *WLC* 15; *WSC* 9) which states: "It pleased God the Father, Son, and Holy Ghost, for the manifestation of the glory of His eternal power, wisdom, and goodness, in the beginning, to create or make of nothing the world, and all things therein, whether visible or invisible, in the space of six days, and all very good." The Confession here appears to teach that creation took place in the span of six, literal 24 hour periods. I do not believe an orthodox view of creation necessitates the "Calendar Day Interpretation" of Genesis 1-2. That being said, I believe God called all things, both invisible and visible, out of nothing (ex nihilo) into being by his voice, as the Belgic Confession 12 states without reference to the span of time: "We believe that the Father, when it seemed good to him, created heaven and earth and all other creatures from nothing, by the Word—that is to say, by the Son."

Second minute reads: "I have a perceived difference with the *WCF* 21.8 (cf. also *WLC* 1117, 119; *WSC* 60), which states: "This Sabbath is to be kept holy unto the Lord when men, after a due preparing of their hearts, and ordering of their common affairs

beforehand, do not only observe an holy rest all the day from their own works, words, and thoughts about their worldly employments and recreations; but also are taken up the whole time in the public and private exercises of His worship, and in the duties of necessity and mercy." The Confession here appears to teach that personal, private activities for pleasure are not appropriate on the Sabbath. I believe that New Covenant Christians keep the Sabbath holy primarily by worshiping God weekly on the First Day (i.e. Sunday). We rest from our work and ordinary labors in order to facilitate our worship of God. Recreational activities that do not hinder our ability to worship are still permissible. This view is expressed in the Heidelberg Catechism 103: "Q. What is God's will for you in the fourth commandment? A. First, that the gospel ministry and education for it be maintained, and that, especially on the festive day of rest, I diligently attend the assembly of God's people to learn what God's Word teaches, to participate in the sacraments, to pray to God publicly, and to bring Christian offerings for the poor."" Both statements depart from the Standards' teaching on the relevant topics, and thus are more than semantic.

Response [2026]: Upon further review, we agree with the General Assembly and should have judged these views as "more than semantic but not striking at the system or vitals of religion." The change has now been noted in our minutes and communicated to the candidate.

2025-04: May 11, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Presbytery incorrectly judged a candidate's stated differences as merely semantic. Both stated differences actually differ from the Confession of Faith.

The first difference reads: "I have a perceived difference with the *WCF* Chapter 21, Section 8: "The Sabbath is then kept holy unto the Lord, when men, after a due preparing of their hearts, and ordering of their affairs beforehand, do not only observe an holy rest, all the day, from their own, works, words, and thoughts about their worldly employments, and recreations, but also are taken up the whole time, in the public and private exercises of his worship, and in the duties of necessity, and mercy." Though I do believe it is important to keep the Sabbath as the Lord's Day and to worship on the first day of the week, when Christ rose. As the pattern laid out in scripture. I do not think we have to literally rest from all worldly matters to keep this. As humans, we are to set aside a day of the week to worship and rest in the Lord. I think the proper way to observe the Sabbath day is to gather together as the body and worship our God and King. (Matt. 28, Acts 2) I do think it is important to set aside the Lord's Day to be purposeful in your reflection on God and gather with the body in your local church. This way you hear the Word proclaimed, pray/reflect on the week. And partake of the Lord's Supper in order to nourish your faith. Though I do not think per the confession, you can do nothing on the Sabbath. I

do think doing things with your family, recreation, yardwork, etc. can all be means of rest and bring glory to God. This is part of our living our lives daily as Christians seeking to honor and serve Christ daily. In other words, as Christians we shouldn't only think about Christ and his word on Sunday. Rather we are to live our daily lives praising him and serving him daily in our various callings. The Sabbath is the day set aside to prepare to live out this calling."

The second difference reads: "I have perceived difference with *WCF* chapter 4 section 1: "It pleased God the Father, Son, and Holy Ghost, and for the manifestation of the glory of his eternal power, wisdom, and goodness in the beginning, to create, or make of nothing, the world, and all things therein whether visible or invisible, in the space of six days; and all very good." My view of creation would be the standard day age view. The 'six days' are understood in the same sense as "in that day" of Isaiah 11:10-11 —that is, as periods of indefinite length and not necessarily of 24 hours duration. There are other similar uses of the Hebrew word for "day" (yôm) in Scripture to support this view of periods longer than 24 hours including that in the very context of Genesis 2:4. Another argument for this approach is that the seventh day in Genesis 1 is not concluded with the boundary phrase, "and there was evening, and there was morning" as with the other days, and therefore it continues, as indicated by Hebrews 4:1-11's quotation of Psalm 95:11."

Response [2026]: Upon further review, we agree with the General Assembly and should have judged these views as "more than semantic but not striking at the system or vitals of religion." The change has now been noted in our minutes and communicated to the candidate.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-01: Feb 10, 2024 (*BCO* 20-8) — No record commissioners appointed by the church presented and prosecuted call before presbytery.

Response [2026]: We are unsure which commission this is referring to. However, we assure the General Assembly that all of our calls on this day were put before presbytery and approved in the proper manner.

Rationale [2026]: No record that the minutes were corrected to record the change of call.

65. That the Minutes of **Pittsburgh Presbytery:** *(57-0-0)*

a. Be approved without exception: **Jan 25, 2025 (ES); Apr 5, 2025 (ES); Aug 28, 2025; Oct 18, 2025**

b. Be approved with exception of form: **Jan 25, 2025; Jul 26, 2025**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 13-2) — No annual reports of TEs without call

2026-02: General 2025 (*BCO* 8-7) — No annual report of TEs laboring out of bounds

2026-03: Apr 5, 2025 (*BCO* 13-10) — No record of transfer or dismissal of members upon dissolving a church.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 (*BCO* 13-2) — No annual report of TE Without Call

Response [2026]: Presbytery acknowledges this oversight and promises to obtain annual reports in the future from teaching elders without call.

2025-02: Oct 19, 2024 (*BCO* 24-1) — Presbytery approved a response from a Session to review of Session records where the Session denied necessity of examining a ruling elder.

Response [2026]: Presbytery acknowledges that adequate care was not given to the response from this Session, and by this response to RPR educates and informs all teaching elders and sessions of their obligation to examine all candidates for ruling elders in our churches, even if they have been previously ordained in another PCA church.

66. That the Minutes of **Platte Valley Presbytery:** *(60-0-0)*

a. Be approved without exception: **Feb 1, 2025; Aug 9, 2025; May 3, 2025 (ES)**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 13-11; *BCO* 40-1) — Minutes of called meeting of Presbytery, September 17, 2025, not submitted for review.

2026-02: May 3, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery.

2026-03: Nov 8, 2025 (*BCO* 13-11; *BCO* 31-2) — There is no record of presbytery's action to form an investigative committee which reported at this meeting.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-02: Feb 3, 2024 (*BCO* 15-2) — The Presbytery established a commission of one person.

Response [2026]: Presbytery agrees with the exception and will plan to establish a commission per *BCO* 15-2 to make such needful appointments in the future and rely upon the Moderator only in the case of emergencies per its standing rules.

2025-03: May 11, 2024 (*BCO* 13-12) — Notice for a called meeting not in order (number and names of elders requesting the called meeting is not documented; purpose of the meeting not stated and/or there was business conducted beyond the purpose of the called meeting)

Response [2026]: Presbytery agrees with the response in that the Clerk mistakenly omitted these details and the Presbytery failed to notice. Presbytery and its Clerk will endeavor to be more careful in the future.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-01: Nov 4, 2023 (*BCO* 21-4.f; *BCO* 21-4.g) — Presbytery appears to have incorrectly ruled the following stated difference as merely semantic. Candidate appears to deny the spiritual presence of Christ in the Lord's Supper, holding only to a memorialist view of the sacrament, which is hostile to our system of doctrine. In candidate's own words: "I do affirm that by the Spirit, Christ is present in and at the observance of the Supper. I believe that the Spirit does confirm and encourage the faith of those who receive the elements by faith in following Jesus in a unique way. We are to remember with love for Christ and sorrow for our sins his body and blood which were sacrificed for us on the cross. But I cannot say that we feed on his spiritual blood or spiritual body in some literal fashion. The act, both physically and spiritually, occurred once and for all time at Golgotha. We rightly counter Roman Catholics who seem repeatedly to crucify Christ when practicing transubstantiation that turns the bread and wine into the corporeal body and blood to feed upon. I am uncomfortable with the Reformed rite if it turns the bread and wine into his spiritual body and spiritual blood upon which we literally feed. The RCC bodily crucifies Christ again and again through the Mass—or so it appears to many Protestants, myself included. I don't wish to appear to crucify Christ spiritually again and again through a Lord's Supper that has recipients eating the spiritual body and spiritual blood. When we "feed on him in our hearts by faith with thanksgiving," I interpret this to mean that we pause to remember and celebrate that at the cross it was finished both in body and in spirit for our salvation—hallelujah and amen. We figuratively feed upon the accomplished work of Christ at the cross as we apply again and again its saving graces to our daily lives through the agency of the supper when accompanied by faith through the Holy Spirit. Again, I may be misunderstanding what the article is saying, in which case, I welcome conversation, and this might not be an exception. For more see the Larger Catechism 168-170 and the Shorter Catechism 96."

Response [2026]: Presbytery agrees that there are statements in the written material that justify the committee's concern. This candidate had many lengthy statements that required discussion on the floor of Presbytery to clarify his understanding and his views. Presbytery was satisfied in its discussion with the candidate on this matter that he did not and does not hold to a Memorialist view of the Lord's Supper in accordance with the Westminster Standards. Presbytery will be more careful to record this in the Minutes in the future.

Rationale [2026]: Presbytery states that they had enough discussion on the floor to be satisfied with the candidates' stated differences. However, they failed to provide sufficient information and did

not amend their records to indicate that the candidates' differences are not more than semantic. As it reads, the candidate's stated difference does appear to be more than semantic.

67. That the Minutes of **Potomac Presbytery:** *(60-0-0)*

a. Be approved without exception: **Mar 15, 2025; Sep 23, 2025; Nov 15, 2025**

b. Be approved with exception of form: **Jun 3, 2025**

c. **Be approved with exception of substance:**

2026-01: Jan 28, 2025 (*BCO* 38-3) — No record that Presbytery made determinations required by *BCO* 38-3, and if the Presbytery judged under 38-3b that it carried out all of the requirements of that provision.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 (*BCO* 8-4, 8-7, 8-8; *BCO* 13-2; Standing Rules 6-3.e) — No record of annual report(s) of TEs laboring out of bounds.

Response [2026]: We thank RPR for their diligent work. We agree with the exception and note the annual reports were received by the appropriate Presbytery Committee (CMMW) and presented with the Needful Works reports in our Stated Meeting on March 16, 2024. We reviewed the situation on 01/27/26 and approved a motion to amend the previously adopted minutes adding this additional information.

Adopted motion to amend the minutes previously adopted for the Stated Meeting of the Potomac Presbytery on March 16, 2024 to add: "[Name Omitted] moved that the Presbytery receive the reports of all ministers on the roll laboring in Needful Works and Out of Bounds." to page 1326.

2025-02: Mar 16, 2024 (*BCO* 23-1) — No record of a congregational votes (for pastors) nor session vote (for assistant pastor) to dissolve a call, nor sessions being cited to appear. Without record of votes, it is not possible to determine if the dissolution was uncontested.

Response [2026]: We thank RPR for their diligent work. We agree with the exception and note that the requisite meetings and work were completed and failed to be recorded in the report or minutes. We reviewed the situation on 01/27/26 and adopted an amendment to our previously adopted minutes updating the meeting dates and completed work.

Adopted motion to amend the minutes previously adopted for the Stated Meeting of the Potomac Presbytery on March 16, 2024 to add "(the date for Session vote for [Name Omitted] dissolution on March 5, 2024)" on page 1326 and to add "(the date for Session vote for [Name Omitted] dissolution on May 26, 2024)" on page 1337.

2025-03: Mar 16, 2024 (*BCO* 8-4; *BCO* 8-7) — Presbytery approved a teaching elder to labor out of bounds without record of the work as

needful (8-4) nor the assurance that he be engaged in preaching and teaching the Word and have full freedom to maintain and teach the doctrine of our Church (8-7).

Response [2026]: We thank RPR for their diligent work. We agree with the exception and note that the committee completed this work in preparation for the March 2024 meeting but failed to adequately record it in their report or in our minutes. We reviewed the situation on 01/27/26 and adopted an amendment to our previously adopted minutes updating the completed work.

Adopted motion to amend the minutes previously adopted for the Stated Meeting of the Potomac Presbytery on March 16, 2024 to add the phrase "viewing this work as needful and having assurance that this call is in accordance with *BCO* 8-7" on page 1326.

68. That the Minutes of **Providence Presbytery:** *(63-0-0)*

a. Be approved without exception: **May 6, 2025; Jun 25, 2025; Aug 5, 2025; Nov 4, 2025; May 6, 2025 (ES)**

b. Be approved with exception of form: **Feb 4, 2025**

c. Be approved with exception of substance: **None.**

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 (*BCO* 40, *BCO* 5-3; Providence Presbytery Bylaws) — Incomplete record of review of records of church Sessions, with indications even some year 2022 records have not been submitted or reviewed.

Response [2026]: The Presbytery agrees with this exception and promises to be more careful in the future. The majority of our Churches submit Minutes for Review in a timely manner, but occasionally some sets are unintentionally overlooked or unnecessarily delayed. Any outstanding sets of Minutes will be reviewed and, if needed, the tools of *BCO* 40-1 will be utilized by the Presbytery.

2025-02: Feb 6, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

Response [2026]: The Presbytery agrees with this exception and promises to be more careful in the future. The Candidate for Ordination did meet all of the requirements for Ordination. Specifically, his knowledge of Greek and Hebrew is satisfied via his degree from an accredited Seminary (RTS) and his theological paper on Justification was approved by the Presbytery. Our examination on Church Government that takes place in a Licensure exam not different than an examination on "principles and rules of the government and discipline of the Church', therefore a Licentiate in Providence must meet the

standard for Ordination, in this area, rather than a lesser examination. Therefore, it is the view of Providence that this fully met this requirement was fully met when the Candidate was Licensed. This serves to correct our previous record.

2025-03: Feb 6, 2024 (*BCO* 20-2, 22-2, 25) — No evidence of a congregational meeting to vote to call the Assistant to be the Associate.

Response [2026]: The Presbytery agrees with this exception and promises to be more careful in the future. The Stated Clerk, under which this Assistant/Associate serves Moderated the Congregational meeting and reports that the vote was near unanimous. While appropriately communicated to our Pastoral Care Committee, our Minutes did not reflect that this requirement had been met. This serves to correct our previous record.

2025-04: Feb 6, 2024 (*BCO* 20-1; *RAO* 16-3.e.6) — Specific Arrangements of call not shown to be approved.

Response [2026]: The Presbytery agrees with this exception and promises to be more careful in the future. Again, specifics were communicated to our Pastoral Care Committee and communicated to the Presbytery, but the Minutes did not reflect that this requirement had been met. This serves to correct our previous record.

2025-05: May 7, 2024 (*BCO* 23-1) — No record that congregation (/Session) was cited to appear before Presbytery.

Response [2026]: The Presbytery agrees with this exception and promises to be more careful in the future. This was an uncontested dissolution and the Minutes clarify the context of the Teaching Elder retiring and being granted Honorably Retired Status. While not specifically cited to appear, three Ruling Elder representatives were Commissioners at the 61st Stated Meeting and could have spoken at any point to address any questions. This serves to correct our record.

2025-06: Aug 6, 2024 (*BCO* 23-1) — No record of report from church to show why Presbytery should dissolve pastoral relation.

Response [2026]: The Presbytery agrees with this exception and promises to be more careful in the future. This was an uncontested dissolution, which was fully communicated to the Presbytery via our Pastoral Care Committee. However, this was not fully detailed in the Minutes. This serves to correct our record.

2025-07: Aug 6, 2024 (*BCO* 23-1) — No record that congregation/Session was cited to appear before presbytery regarding the dissolution of pastoral relations.

Response [2026]: The Presbytery agrees with this exception and promises to be more careful in the future. This Congregation

was present via one Ruling Elder Commissioner and would have had the ability to answer any questions regarding this dissolution, though we did not record that they were specifically cited to appear at the 62nd Stated Meeting. This serves to correct our record.

2025-08: Aug 6, 2024 (*BCO* 23-1) — No record that congregation (/Session) was cited to appear before Presbytery.

Response [2026]: This appears to be a duplicate exception (albeit slightly different language between 2025-07 and 2025-08). This conclusion is reached by there only being one dissolution between a Teaching Elder and Congregation that took place on this date, so we have no further ability to respond.

69. That the Minutes of **Rio Grande Presbytery:** *(52-10-2)*

a. Be approved without exception: **Jan 27–28, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*RAO* 16-4.c.3) — No response to Assembly concerning disposition of an exception.

2026-02: Apr 28–29, 2025 (*BCO* 18-2) — No record of six months membership for candidate.

2026-03: Apr 28–29, 2025 (*BCO* 21-4) — There is record of the Presbytery examining the candidate but needs to utilize language reflecting *BCO* 21-4 and experiential religion not simply the "testimony" of the candidate.

2026-04: Sep 23–24, 2025 (*BCO* 21-4.f.) — Presbytery granted a doctrinal exception that appears to be hostile at the system or striking at the vitals of religion. The candidate does not limit his differences to the image of the incarnate Christ only, but to all three Persons of the Trinity. The candidate stated, "'I affirm the standards' exposition on the second commandment (*WSC* 50-51, *WLC* 108-110) with the exception of including... the making any representation of God, of all or of any of the three persons, either inwardly in our mind, or outwardly in any kind of image or likeness of any creature whatsoever...." (*WLC* 109) among the sins forbidden in the second commandment unless that prohibition is understood to be limited by the following clause, 'all worshiping of it, or God in it or by it.' Otherwise, the prohibition against "any representation..." extends beyond the scriptures (Ex. 20:4-6., Deut. 5:8-10), which have as their focus images, whether of God or any creature, made as objects of worship in themselves, "or God in it or [God] by it.' Additionally, were this prohibition to be unqualified by 'all worshiping of it, or God in it or by it' and understood to be prohibiting the making of any images of God whatsoever, then the prohibition would also include making any images of 'any creature" (LC 109)' in heaven above, or that is on the earth beneath, or that is in the water under the

earth' (Ex. 20:4-6., Deut. 5:8-10). I know of no one who makes this argument. Rather, we understand the prohibition is against making images of any creature in heaven above, or that is on the earth beneath, of that is in the water under the earth as an object of worship or a representation of God for worship, e.g., the golden calf.

Thus, my view is the second commandment does not forbid the 'making of any representation...' of 'God, of all or of any of the three persons,' it forbids the making of those representations for the 'worshiping of it, or God in it or by it.' In other words, I affirm "the second commandment forbids the worshiping of God by images, or any way not appointed in his Word." (*WSC*) It does not forbid all image-making."

2026-05: Sep 23–24, 2025 (*BCO* 18-2) — No record of six months membership for candidate.

2026-06: Sep 23–24, 2025 (*BCO* 21-4) — There is record of the Presbytery examining the candidate but needs to utilize language reflecting *BCO* 21-4 and experiential religion not simply "testimony" of the candidate.

2026-07: Sep 23–24, 2025 (*BCO* 22-6) — Presbytery approved the extension of relationship of stated supply without any record of the request of the Session.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-01: Jan 23–24, 2023 (*RAO* 16-3.e.5.a–d.) — No record of requiring statement of differences with our Standards.

Response [2025]: Amended the Jan 23-24, 2023 Minutes with the following addition:

"At the ordination exam, it is noted that the court approved two exceptions of substance regarding the Westminster Standards as more than semantic but not striking at the vitals of religion. This was approved at the April 25, 2022 Stated Meeting."

Rationale [2025]: Presbytery has still not provided the stated difference in the man's own words.

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the January 23–24, 2023 ordination examination by noting that the ordinand affirmed that his stated differences with the Westminster Standards were unchanged from those judged and approved by Presbytery at its April 25–26, 2022 licensure examination, and that Presbytery acknowledged and accepted this affirmation, reaffirming its prior judgment under *BCO* 21-4 and *RAO* 16-3.e.5."

The Stated Clerk was instructed to place a marginal notation in the approved January 2023 minutes directing readers to this correction.

Presbytery resolved to record explicitly in future ordination

exams whether a candidate's differences have changed or remained the same from licensure.

2025-03: General 2024 (*BCO* 19-12) — Annual report of interns not included.

Response [2026]: We apologize to RPR for this oversight. We have no active interns and should have recorded that in the minutes. We will correct this moving forward.

2025-04: General 2024 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

Response [2026]: We apologize to RPR for this oversight. TE [Name omitted], TE [Name Omitted] and TE [Name Omitted] are currently laboring out of bounds. We will correct this moving forward.

2025-05: Jan 22–23, 2024 (*BCO* 18-2) — No record of six months membership for candidate.

Response [2026]: At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record concerning the January 22–23, 2024 minutes by noting that Mr. [Name Omitted] had been a member in good standing for at least six months prior to his being examined to come under care."

The Stated Clerk was instructed to make a marginal notation in the approved January 2024 minutes directing readers to this correction in the January 2026 minutes.

Presbytery further resolved to be diligent in future minutes to record the membership status required under *BCO* 18-2.

2025-06: Jan 22–23, 2024 (*BCO* 18-3) — All specific requirements of candidate exam not recorded. [Must list "experiential religion and motives for seeking the ministry."]

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the January 22–23, 2024 meeting by noting that, in the examination of Mr. [Name Omitted] for coming under care, the court did examine him concerning his experiential religion and his motives for seeking the ministry, as required by *BCO* 18-3."

The Stated Clerk was instructed to place a marginal notation in the approved January 2024 minutes directing readers to this correction.

Presbytery further resolved to be diligent in future minutes to record all required components of candidate examinations under *BCO* 18-3.

2025-07: Jan 22–23, 2024 (*BCO* 18-2) — No record of six months

membership for candidate.

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the January 22–23, 2024 meeting by noting that [Name Omitted] had been a member in good standing of [Church Omitted] for at least six months prior to his examination to come under care, as required by *BCO* 18-2."

The Stated Clerk was instructed to place a marginal notation in the approved January 2024 minutes directing readers to this correction.

Presbytery further resolved to be diligent in future minutes to record the membership status of candidates under *BCO* 18-2.

2025-08: Jan 22–23, 2024 (*BCO* 18-3) — All specific requirements of candidate exam not recorded. [Must list "experiential religion and motives for seeking the ministry."]

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the January 22–23, 2024 meeting by noting that, in the examination of Mr. [Name Omitted] for coming under care, the court did examine him concerning his experiential religion and his motives for seeking the ministry, as required by *BCO* 18-3."

The Stated Clerk was instructed to place a marginal notation in the approved January 2024 minutes directing readers to this correction.

Presbytery further resolved to be diligent in future minutes to record all required components of candidate examinations under *BCO* 18-3.

2025-09: Jan 22–23, 2024 (*BCO* 19-2.d; *RAO* 16-3.e.5) — All specific requirements of licensure exam not recorded. [No record of when sermon was preached before Presbytery or its committee. No record of submission of written sermon.]

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the January 22–23, 2024 meeting by noting that, as part of his licensure examination, Mr. [Name Omitted] did preach his sermon before the Presbytery during that meeting in accordance with *BCO* 19-2.d and *RAO*

16-3.e.5."

The Stated Clerk was instructed to place a marginal notation in the approved January 2024 minutes directing readers to this correction.

Presbytery further resolved to be diligent in future minutes to record explicitly both the delivery and written submission of sermons in licensure examinations.

2025-10: Jan 22–23, 2024 (*BCO* 38-2) — No record that TE desired to demit from ministry.

Response [2026]: "That Presbytery correct the record regarding the demission of Teaching Elder Doug Coyle as follows:

(1) January 22–23, 2024 Minutes: The item listed on the agenda relating to [Name Omitted] did not involve a formal request to demit the ministry. No such request was made at that meeting, and Presbytery took no action on the matter, since it was deferred until the April 2024 stated meeting.

(2) April 22–23, 2024 Minutes: TE [Name Omitted] did request to demit the ministry in accordance with *BCO* 38-2, and Presbytery granted his request and divested him of office without censure. This action is hereby properly recorded as having taken place at the April 2024 meeting."

The Stated Clerk was instructed to place marginal notations in both sets of minutes directing readers to this correction.

Presbytery further resolved to record clearly the TE's desire to demit and Presbytery's action upon that request in all future cases, in accordance with *BCO* 38-2.

2025-11: Jan 22–23, 2024 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery.

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the January 22–23, 2024 meeting by noting that [Church Name Omitted] held a duly called congregational meeting on January 14, 2024, at which a quorum was present and the congregation unanimously voted to request the dissolution of TE [Name Omitted]'s pastoral relationship with the church. Presbytery acted upon this congregational request in dissolving the call at its January 2024 meeting."

The Stated Clerk was instructed to place a marginal notation in the approved January 2024 minutes directing readers to this correction.

Presbytery further resolved to be diligent in future minutes to record congregational meetings and votes connected to pastoral

dissolutions.

2025-12: Jan 22–23, 2024 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery.

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the January 22–23, 2024 meeting by noting that [Church Name Omitted] held a duly called congregational meeting on January 21, 2024, at which a quorum was present and the congregation voted to request the dissolution of the pastoral relationship with TE [Name Omitted], effective January 24, 2024. Presbytery acted upon this congregational request in dissolving the call at its January 2024 meeting."

The Stated Clerk was instructed to place a marginal notation in the approved January 2024 minutes directing readers to this correction.

Presbytery further resolved to be diligent in future minutes to record congregational meetings and votes connected to pastoral resignations and dissolutions of call.

2025-13: Apr 22–23, 2024 (*BCO* 19-2.d) — All specific requirements of licensure exam not recorded. [No record of when sermon was preached before Presbytery or its committee. No record of submission of written sermon.]

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the April 22–23, 2024 meeting by noting that, as part of his licensure examination, Mr. [Name Omitted] did preach his sermon before the Presbytery during that meeting, and that he submitted his written sermon manuscript to the Ordination Committee in accordance with *BCO* 19-2.d and *RAO* 16-3.e.5."

The Stated Clerk was instructed to place a marginal notation in the approved April 2024 minutes directing readers to this correction.

Presbytery further resolved to be diligent in future minutes to record both the delivery and written submission of sermons in licensure examinations.

2025-14: Apr 22–23, 2024 (*BCO* 18-2) — No record of six months membership for candidate.

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its

record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the April 22–23, 2024 meeting by noting that Mr. [Name Omitted] had been a member in good standing of [Church Name Omitted] for at least six months prior to his examination to come under care, as required by *BCO* 18-2."

The Stated Clerk was instructed to place a marginal notation in the approved April 2024 minutes directing readers to this correction.

Presbytery further resolved to be diligent in future minutes to record the membership status of candidates under *BCO* 18-2.

2025-15: Apr 22–23, 2024 (*BCO* 18-3) — All specific requirements of candidate exam not recorded. [Must list "experiential religion and motives for seeking the ministry."]

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the April 22–23, 2024 meeting by noting that, in the examination of Mr. [Name Omitted] for coming under care, the court did examine him concerning his experiential religion and his motives for seeking the ministry, as required by *BCO* 18-3."

The Stated Clerk was instructed to place a marginal notation in the approved April 2024 minutes directing readers to this correction.

Presbytery further resolved to be diligent in future minutes to record all required components of candidate examinations under *BCO* 18-3.

2025-16: Apr 22–23, 2024 (*BCO* 38-2) — No record that TE desired to demit from ministry.

Response [2026]: "That Presbytery correct the record regarding the demission of [Name Omitted] as follows:

(1) January 22–23, 2024 Minutes: The item listed on the agenda relating to TE [Name Omitted] did not involve a formal request to demit the ministry. No such request was made at that meeting, and Presbytery took no action on the matter, since it was deferred until the April 2024 stated meeting.

(2) April 22–23, 2024 Minutes: TE [Name Omitted] did request to demit the ministry in accordance with *BCO* 38-2, and Presbytery granted his request and divested him of office without censure. This action is hereby properly recorded as having taken place at the April 2024 meeting."

The Stated Clerk was instructed to place marginal notations in

both sets of minutes directing readers to this correction.

Presbytery further resolved to record clearly the TE's desire to demit and Presbytery's action upon that request in all future cases, in accordance with *BCO* 38-2.

2025-17: Jun 27, 2024 (*BCO* 13-12; *RAO* 16-3.c.1) — Purpose of called meeting not recorded verbatim in the minutes.

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the June 27, 2024 called meeting by inserting verbatim the stated purpose of the meeting, as contained in the official call, as follows:

'As you know, we have been prayerfully considering a candidate to plant a church in Taos, NM. The credentials committee is recommending a call to TE [Name Omitted]. At this point, [Name Omitted] will need to move his family to Taos by August 2024 and thus, a called meeting is needed to issue his call before our stated September meeting.'"

The Stated Clerk was instructed to place a marginal notation in the approved June 2024 minutes directing readers to this correction.

Presbytery resolved to ensure that the purpose of called meetings is recorded verbatim in the minutes of all future called meetings.

2025-18: Jun 27, 2024 (*BCO* 46-6; 13-7) — No record regarding the reception of a certificate of dismission from transferring presbytery (May be accomplished through Clerks portal).

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the June 27, 2024 meeting by noting that Presbytery did receive the certificate of dismission for TE [Name Omitted] from South Coast Presbytery through the PCA Clerks Portal, in accordance with *BCO* 46-6 and *BCO* 13-7."

The Stated Clerk was instructed to place a marginal notation in the approved June 2024 minutes directing readers to this correction.

Presbytery resolved to record the reception of certificates of dismission clearly in all future transfer examinations.

2025-19: Jun 27, 2024 (*BCO* 13-6) — Incomplete record of examination of TE transferring into Presbytery. [Should be Christian experience rather than testimony and call to ministry, and views examined must be listed:

theology, the sacraments, and church government.]

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the June 27, 2024 meeting by noting that, as part of his transfer examination, TE [Name Omitted] was examined concerning his Christian experience, and that Presbytery examined him in his views on theology, the sacraments, and church government, as required by *BCO* 13-6."

The Stated Clerk was instructed to place a marginal notation in the approved June 2024 minutes directing readers to this correction.

Presbytery resolved to ensure that all required areas of transfer examinations are explicitly stated in future minutes, in accordance with *BCO* 13-6.

2025-20: Jun 27, 2024 (*BCO* 5-3.c; 15-1; *PP* II.6) — No record that members of interim/provisional Session were called by the congregation.

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the June 27, 2024 called meeting by noting that the Presbytery appointed its Mission to North America (MNA) Committee to serve as the provisional Session for the [Church Name Omitted], consisting of TE [Name Omitted], TE [Name Omitted], RE [Name Omitted], and RE [Name Omitted], and that the congregation of the [Church Name Omitted] received and recognized this provisional Session as those appointed to govern the work in accordance with *BCO* 5-3.c, *BCO* 15-1, and Presbyterian Polity II.6."

The Stated Clerk was instructed to place a marginal notationran.

2025-21: Aug 3, 2024 (*BCO* 13-12; *RAO* 16-3.c.1) — Purpose of called meeting not recorded verbatim in the minutes.

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the August 3, 2024 called meeting by inserting verbatim the stated purpose of the meeting, as contained in the official call, as follows:

'In the last six weeks, numerous Teaching and Ruling Elders from various presbyteries have expressed their concerns regarding TE [Name Omitted] views regarding slavery posted

online at X/Twitter. Furthermore, these Elders have requested that we consider opening a *BCO* 31-2 investigation into TE [Name Omitted] particular theological views and general Christian conduct as it pertains to his public witness on online platforms. The Admin Committee has met several times over the last six weeks and have voted unanimously to bring a recommendation to form an investigative committee according to *BCO* 31-2.'"

The Stated Clerk was instructed to place a marginal notation in the approved August 2024 minutes directing readers to this correction.

Presbytery committed to ensuring that the purpose of all future called meetings is recorded verbatim in the minutes, in accordance with *BCO* 13-12 and *RAO* 16-3.c.1.

2025-22: Sep 23–24, 2024 (*BCO* 46-6; 13-7) — No record regarding the reception of a certificate of dismission from transferring presbytery (May be accomplished through Clerks portal).

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the September 23–24, 2024 meeting by noting that Presbytery did receive the certificate of dismission for TE [Name Omitted] from the Northern California Presbytery through the PCA Clerks Portal, in accordance with *BCO* 46-6 and *BCO* 13-7."

The Stated Clerk was instructed to place a marginal notation in the approved September 2024 minutes directing readers to this correction.

Presbytery resolved to record the reception of certificates of dismission explicitly in all future minutes of transfer examinations.

2025-23: Sep 23–24, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Presbytery improperly classified a view regarding marriage with Roman Catholics as "more than semantic but not out of accord with any fundamental of our system of doctrine" rather than "merely semantic."

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the September 23–24, 2024 meeting by noting that TE [Name Omitted] stated difference regarding Westminster Confession 24.3 (marriage with Roman Catholics) should have been classified as a merely semantic difference under *BCO* 21-4, rather than as 'more than

semantic but not out of accord with any fundamental of our system of doctrine,' and the minutes are hereby corrected to reflect the proper classification."

The Stated Clerk was instructed to place a marginal notation in the approved September 2024 minutes directing readers to this correction.

Presbytery affirmed its commitment to classifying stated differences accurately under *BCO* 21-4 in future examinations.

2025-24: Sep 23–24, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Presbytery failed to judge candidate's stated differences.

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery clarify the record of the September 23–24, 2024 meeting by noting the final judgment of Presbytery regarding TE [Name Omitted] stated differences under *BCO* 21-4, as follows:

1. *WCF* 21.8 (Sabbath) — judged to be more than semantic but not out of accord with any fundamental of our system of doctrine.

2. *WCF* 24.3 (marriage with Roman Catholics) — judged to be a merely semantic difference.

Presbytery further clarifies that the subsequent motion to classify the differences as 'more than semantic but not out of accord' and to forbid the candidate to teach them was defeated, and the exam was sustained as a whole."

The Stated Clerk was instructed to place a marginal notation in the approved September 2024 minutes directing readers to this correction.

Presbytery affirmed its commitment to making clear judgments on stated differences in accordance with *BCO* 21-4.

2025-25: Sep 23–24, 2024 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery.

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the September 23–24, 2024 meeting by noting that [Church Name Omitted] held a duly called congregational meeting on September 15, 2024, at which a quorum was present and the congregation voted to request the dissolution of the pastoral relationship with TE [Name Omitted]. Presbytery acted upon this congregational request in dissolving the call at its September 2024 meeting."

The Stated Clerk was instructed to place a marginal notation in the approved September 2024 minutes directing readers to this correction.

Presbytery resolved to record congregational actions relating to pastoral dissolutions explicitly in future minutes, in accordance with *BCO* 23-1.

2025-26: Nov 12, 2024 (*BCO* 46-6; 13-7) — No record regarding the reception of a certificate of dismission from transferring presbytery (May be accomplished through Clerks portal).

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the September 23–24, 2024 meeting by noting that TE [Name Omitted] was examined and approved to serve as Stated Supply for [Church Name Omitted] in Las Cruces, NM, and that he did not transfer his credentials to the Rio Grande Presbytery but remained a member of Lowcountry Presbytery; therefore, no certificate of dismission was required under *BCO* 46-6 or *BCO* 13-7."

The Stated Clerk was instructed to place a marginal notation in the approved September 2024 minutes directing readers to this correction.

Presbytery resolved to distinguish clearly in future minutes between transfer examinations and examinations for stated supply.

2025-27: Nov 12, 2024 (*BCO* 13-6) — Incomplete record of examination of TE transferring into Presbytery. [Should be Christian experience rather than testimony and call to ministry, and views examined must be listed: theology, the sacraments, and church government.]

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the November 12, 2024 meeting by noting that, as part of his transfer examination, TE [Name Omitted] was examined concerning his Christian experience, and that Presbytery examined him in his views on theology, the sacraments, and church government, as required by *BCO* 13-6."

The Stated Clerk was instructed to place a marginal notation in the approved November 2024 minutes directing readers to this correction.

Presbytery resolved to record all required components of transfer examinations clearly and explicitly in future minutes.

2025-28: Nov 12, 2024 (*BCO* 46-6; 13-7) — No record regarding the reception of a certificate of dismission from transferring presbytery (May be accomplished through Clerks portal).

Response [2026]: Presbytery acknowledges this exception.

At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery correct the record of the November 12, 2024 meeting by noting that Presbytery did receive the certificate of dismission for TE [Name Omitted] from the Southern Louisiana Presbytery through the PCA Clerks Portal, in accordance with *BCO* 46-6 and *BCO* 13-7."

The Stated Clerk was instructed to place a marginal notation in the approved November 2024 minutes directing readers to this correction.

Presbytery further resolved to ensure that all certificates of dismission are explicitly recorded in future minutes of transfer examinations.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-01: General 2024 (*BCO* 13-9.b; 40-1) — No record of review of records of church Sessions.

Response [2026]: In the minutes.

Rationale [2026]: Presbytery did not demonstrate that they corrected the record and action of reviewing Session records. Please *RAO* 16-10 for guidelines for responding to General Assembly.

2025-02: General 2024 (*BCO* 18-6) — Annual reports of candidates not included.

Response [2026]: At the January 2026 Stated meeting, a motion was movd, seconded, and carried to approve the current candidate list:

[Names omitted]

In the future, RGP will make sure that an annual repoert of candidates is included

Rationale [2026]: No response given regarding the annual report reports of candidates in 2024.

2025-30: Nov 12, 2024 (*BCO* 21-4.f) — Presbytery appears to have incorrectly judged that a candidate's stated difference is not out of accord with any fundamental of our system of doctrine because the difference is neither hostile to the system nor strikes at the vitals of religion. TE seems to imply that making images of God isn't forbidden by the second commandment. "2) Larger Catechism 109. Where the Confession states 'The sins forbidden in the second commandment are…the making any representation of God, or of any of the three persons, either inwardly in our mind, or outwardly in any kind of image or likeness of

any creature whatsoever,' I believe that Scripture teaches in the second commandment (Exodus 20:4) that it is forbidden to make idols or images to bow down and worship, but not that it is forbidden to make any representation of God at all, either inwardly or outwardly. Though Christian tradition has generally found it impious to create images of God the Father, it has not generally thought the same with regard to Christ, the Son of God, or the Holy Spirit. More specifically, the Scriptures themselves speak of the form of Jesus (e.g. Isaiah 53, John 20:24- 29, etc.) and of the Holy Spirit in the form of a creature (Matthew 3:16). Thus I believe that the confession goes beyond the prohibitions of Scripture in this regard."

Response [2026]: Presbytery acknowledges this exception. At its January 2026 stated meeting, Presbytery corrected its record by adopting the following motion to Amend Something Previously Adopted:

"That Presbytery clarify the record of the November 12, 2024 meeting by noting that, in evaluating TE [Name Omitted]'s stated difference regarding images of God (WLC 109), Presbytery took into account his explicit affirmation that he would not teach or practice anything contrary to the Westminster Standards or the Book of Church Order, and that he understood himself to be bound in practice by his ordination vows and by the doctrine and discipline of the Church. Presbytery judged the stated difference in light of this affirmation, and sustained the exam as a whole."

The Stated Clerk was instructed to place a marginal notation in the approved November 2024 minutes directing readers to this clarification.

Presbytery affirms that this clarification pertains only to the accuracy of the minutes and does not alter the substance of any presbytery action.

Rationale [2026]: The Presbytery did amend their record but did not correct their action in incorrectly judging the candidate's stated difference to be not out of accord with any fundamental of our system of doctrine.

f. **That the following responses shall be submitted to the following GA as no responses were received in 2026:**

2025-29: Nov 12, 2024 (*BCO* 21-4.f) — Presbytery appears to have incorrectly judged that a candidate's stated difference is not out of accord with any fundamental of our system of doctrine because the difference is neither hostile to the system nor strikes at the vitals of religion. "4) *WLC* #177 (maybe *WSC* #97). I believe in paedocommunion (young child communion). Our baptized children are 'not only for the solemn admission of the party baptized into the visible Church, but also to be unto him a sign and seal of the covenant of grace, of his ingrafting into

Christ, of regeneration, of remission of sins, and of his giving up unto God, through Jesus Christ, to walk in newness of life' (*WCF* 28.1). I believe they should likewise be welcome at the Lord's Table as part of this family when they are welcomed to the kitchen table as part of their families (i.e., not as suckling infants but as young children). As described in the *WCF* 31.4, 'suspension from the sacrament of the Lord's Supper for a season' is for those who are being disciplined, and I do not believe it is biblical to treat, our covenant children the same way as 89 'obstinate offenders.' (*WCF* 31.3) I agree with Dr. Robert S. Rayburn's position in the Minority Report to the Ad-Interim Committee to Study the Question of Paedocommunion (16th GA). However, and this is probably the most important aspect of this, I will NOT nor have I ever practiced anything contrary to that which is permitted in the Westminster Standards and the *BCO*, as God's Word and my ordination vows would require me to submit in practice to the judgment of the church in this matter." ["I believe in paedocommunion."].

Response [2026]: No Response Received.

g. **That the General Assembly:**

Cite Rio Grande Presbytery to appear by its representative before the Committee on Review of Presbytery Records at its 2027 meeting (date to be determined by the Administrative Committee) with responses to the 53rd General Assembly. If the Presbytery desires, the Presbytery may appoint its representative to also act as its representative to serve on the RPR committee.

70. That the Minutes of **Rocky Mountain Presbytery:** *(57-0-0)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Jan 23, 2025 (*BCO* 8-7) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church.

2026-02: Jan 23, 2025 (*BCO* 18-2) — No record of six months membership for candidate.

2026-03: Apr 24, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-04: Apr 24, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery.

2026-05: Apr 24, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session and six months membership for candidate.

2026-06: Apr 24, 2025 (*BCO* 18-3) — Incomplete record of examination of candidate for Gospel Ministry.

2026-07: Oct 1–2, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session and six months membership for candidate.

2026-08: Oct 1–2, 2025 (*BCO* 18-3) — Incomplete record of examination of candidate for Gospel Ministry.

2026-09: Oct 1–2, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session.

2026-10: Oct 1–2, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-11: Oct 1–2, 2025 (*BCO* 21-4) — Use of the extraordinary clause for ordination candidate not explained and 3/4 vote not recorded.

2026-12: Oct 1–2, 2025 (*BCO* 18-3) — Incomplete record of examination of candidate for Gospel Ministry.

2026-13: Oct 1–2, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-14: Oct 1–2, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-15: Oct 1–2, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

2026-16: Oct 2, 2025 (ES) (*BCO* 38-1) — Full *BCO* 38-1 Confession for case without process not recorded in minutes.

2026-17: Oct 2, 2025 (ES) (*BCO* 34-9) — No record of pastoral relationship being dissolved when minister deposed.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-03: General 2023 (*BCO* 18-7) — No record that candidate was notified of the reasons that he was removed from the roll.

Response [2025]: Rocky Mountain Presbytery agrees with this exception and corrects its record (if possible), corrects its actions (if possible) and promises to be more careful in the future.

RMP believes the candidates were notified of the reasons for removal from the roll of Candidates being Under Care of presbytery, but no record was recorded in the minutes that the presbytery was properly informed. RMP promises to be more careful in the future.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery needs to amend their minutes and note why candidate was removed

Response [2026]: Presbytery agrees with the exceptions and corrects its record (if possible), corrects its actions (if possible) and promises to be more careful in the future.

2023 Spring Stated Meeting: Presbytery voted to remove Mr. [Name Omitted] as a Candidate Under Care of Rocky Mountain Presbytery at the request of [Church Name Omitted] Colorado Springs in conversation with the Candidate because Mr. [Name Omitted] was no longer pursuing pastoral ministry.

2023 Fall Stated Meeting: Presbytery voted to remove Mr. [Name Omitted], at his request, from under care and to release

Mr. [Name Omitted] from his internship at [Church Name Omitted], Castle Rock, CO.

2024-05: Oct 5, 2023 (*BCO* 22-5) — No record that session requested stated supply.

Response [2025]: Rocky Mountain Presbytery agrees with this exception and corrects its record (if possible), corrects its actions (if possible) and promises to be more careful in the future.

RMP failed to verify and record that the Session at [Church Name Omitted]. RMP apologizes for this error and promises to be more careful in the future. TE [Name Omitted], Assistant Pastor at [Church Name Omitted], had been filling the pulpit at [Church Name Omitted] quite often and it seemed appropriate for [Church Name Omitted] to call him as Stated Supply Pastor.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery needs to amend their minutes and note the action of the session requesting stated supply

Response [2026]: Presbytery agrees with the exceptions and corrects its record (if possible), corrects its actions (if possible) and promises to be more careful in the future.

Minutes from the 2023 Fall Stated Meeting will corrected by adding the following statement:

TE [Name Omitted] was approved to be Stated Supply at [Church Omitted] at the request the Session of [Church Name Omitted].

2025-01: Jan 25, 2024 (*BCO* 18-2) — No record of six months membership for candidate

Response [2026]: Presbytery agrees with the exceptions and corrects its record (if possible), corrects its actions (if possible) and promises to be more careful in the future.

We apologize that our minutes did not reflect approving an exception based on the recommendation of his church session [Church Name Omitted]. The session noted that the candidate had been serving at the church since May 2023.

We will correct our record to reflect approval of the exception.

2025-04: Apr 25, 2024 (*BCO* 18-2) — No record of six months membership for candidate and Presbytery waived the requirement without providing a reason

Response [2026]: Presbytery agrees with the exceptions and corrects its record (if possible), corrects its actions (if possible) and promises to be more careful in the future.

We apologize for not recording approval of the waiving of the six month membership rule. The Session at [Church Name Omitted] requested waiving of the rule for one candidate, and the Session at [Church Name Omitted] requested waiving of the

rule for the second candidate.

We will correct our record to reflect approval of the exceptions.

2025-05: Apr 25, 2024 (*BCO* 15) — Ordination commission approved without names of members or designating how the commission would be populated

Response [2026]: Presbytery agrees with the exceptions and corrects its record (if possible), corrects its actions (if possible) and promises to be more careful in the future.

Rocky Mountain Presbytery Standing Rules 3.1 gives the Moderator authority to "appoint members of all standing and special committees" and it has been our practice to extend the Moderator's authority to appoint members of RMP Commissions.

We agree that it would be good practice for the presbytery to approve granting the Moderator authorization to appoint members to a Commission. We will consider amending the Standing Rules to specifically grant such authority to the Moderator.

2025-06: Oct 3, 2024 (*BCO* 20-1) — The call of someone transferring into the Presbytery was found to not be in order and the person did not desire to accept the call, but the transfer was completed.

Response [2026]: Rocky Mountain Presbytery agrees with the concern of RPR as stated in this exception. Presbytery found the financial package offered by the church was inadequate and the church expressed a willingness to improve the financial arrangement. Presbytery was confident the result end up being acceptable and therefore approved the transfer. The Commission to Install was approved and was tasked to negotiate for acceptable terms of the Call as part of its Commission duties. Installation of the candidate would happen after negotiations with the church were acceptable to the Commission.

Through the work of the Commission the Call was approved and received by the candidate. However, Presbytery failed to make sure the Commission Report included terms of Call that were accepted. We apologize for the oversight and will request a copy of the Call for the Presbytery to review.

2025-07: Oct 3, 2024 (*BCO* 21-4.i) — Presbytery failed to clearly justify its use of the extraordinary clause.

Response [2026]: Presbytery respectfully disagrees with the exception, states its grounds and refers the exception back to the Assembly.

We believe the justification recorded in the minutes explains the reason for using the Extraordinary Clause, which was approved by a unanimous vote.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2021-02: General 2023 (*BCO* 13-9.b; *BCO* 40-1) — Incomplete record of review of records of church Sessions. (Received and reviewed 7 churches. At Spring Stated Meeting, Session record of churches north of Denver are reviewed. (SR1.072) No report of reviewed records at Fall Stated Meeting. At Fall Stated Meeting, Session records of churches in and south of Denver are reviewed. (SR 1.072) (Please refer to the Clerk's Report for responses previously submitted that the General Assembly found unsatisfactory, along with their rationale.)

Response [2022]: Rocky Mountain Presbytery agrees with the exception and will correct our record (if possible), will correct our action (if possible), and promises to be more careful in the future.

Rationale [2022]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). The Presbytery should act to include appropriate documentation in its record.

Response [2023]: Rocky Mountain Presbytery respectfully asks for clarification to what year these exceptions took place so corrections can be made appropriately.

Rationale [2023]: This 2022 General exception regards the RMP minutes of 2021 (7 of 35 churches reviewed, pp. 42, 70).

Response [2024]: Rocky Mountain Presbytery agrees with this exception and corrects its record (if possible), corrects its actions (if possible) and promises to be more careful in the future. In reviewing Presbytery minutes for 2021, we found that of the 35 churches in the directory for that year 12 churches submitted minutes for review, 20 churches did not submit records for review, and 3 churches have since dissolved. RMP will request 2021 records for review from the 20 churches not previously reviewed.

Rationale [2024]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted or noted that the 2021 session minutes have been received and reviewed.

Response [2026]: Presbytery agrees with the exceptions and corrects its record (if possible), corrects its actions (if possible) and promises to be more careful in the future.

RMP acknowledges past discrepancies related to reviewing Session records. The Administration Committee is developing a more thorough process that will be implemented for reviews beginning in January 2026. At that meeting presbytery will be receive a report on all delinquent reviews, which then will be used to correct previous records.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not noted that the 2021 session

minutes have been received and reviewed.

2025-02: Jan 25, 2024 (*BCO* 13-10) — No record of transfer or dismissal of members upon dissolving a church

Response [2026]: Presbytery agrees with the exceptions and corrects its record (if possible), corrects its actions (if possible) and promises to be more careful in the future.

We did receive a request to dissolve the church from the congregation at [Church Name Omitted]. We apologize that our minutes did not include that detail.

We will correct our record to show the [Church Name Omitted] congregation requested the Rocky Mountain Presbytery to dissolve the church.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery did not record transfer or dismissal of members upon dissolving [Church Name Omitted].

2025-03: Jan 25, 2024 (*BCO* 15-2) — Presbytery commission does not include at least two REs.

Response [2026]: Presbytery agrees with the exceptions and corrects its record (if possible), corrects its actions (if possible) and promises to be more careful in the future.

We apologize for the oversight and will make sure the Commission includes at least one more RE. We also will be more diligent in the future.

Rationale [2026]: No record that Presbytery corrected its action (*RAO* 16-10.b.1). Presbytery would have to approve actions of unduly constituted commissions.

71. That the Minutes of **Savannah River Presbytery:** *(61-0-0)*

a. Be approved without exception: **Jan 25, 2025; Jul 18, 2025; Aug 12, 2025**

b. Be approved with exception of form: **Apr 15, 2025**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 13-2) — No record of annual report of TE without a call

2026-02: General 2025 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

2026-03: Oct 21, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

72. That the Minutes of **Siouxlands Presbytery:** *(61-0-0)*

a. Be approved without exception: **Sep 25–26, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Jan 24, 2025 (*BCO* 8-7) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church.

2026-02: Jan 24, 2025 (*BCO* 13-10; *BCO* 5-2c) — Provisional Session is dismissed without explanation.

2026-03: Jan 24, 2025 (*BCO* 15-1; *RAO* 16-3e.4) — Minutes of commission not entered in Presbytery minutes. Presbytery needs to submit these minutes for review.

2026-04: Jan 24, 2025 (*RAO* 16-3c.6) — RE delegates listed without the church they represented.

2026-05: Apr 24, 2025 (*BCO* 18-2) — No record of endorsement by candidate's Session.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-07: Apr 27, 2023 (*BCO* 18-7) — Apparent improper removal of candidates from the roll.

Response [2025]: The Presbytery removed the candidates from the roll of candidates at their request per *BCO* 18-7, but we acknowledge our failure to provide documentation that the sufficient reasons were reported to the Presbytery to act on the Committee's recommendation for removal.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted record of the candidate's request to be removed from the roll.

Response [2026]: *BCO* 18-7 states: "A candidate shall, at his request or at the request of his Session, be allowed to withdraw from the care of the Presbytery. But in such a case sufficient reasons (and any actions taken) must be reported to the Presbytery. The Presbytery may also, for sufficient reasons, remove the name of the candidate from its roll of candidates; but in such a case it shall report its actions and the reasons therefore to the candidate and to the Session of his church. In all cases of a removal or withdrawal of a candidate, the sufficient reason for the actions shall be recorded in the minutes of Presbytery."

The request for removal was communicated to the Candidates and Credentials Committee by the Clerk of the Session as noted in the Committee report (See 127-25), where these 3 men were members.

Upon hearing the reason for the request—that these three men were no longer pursuing the gospel ministry and that the Session, concurring with that judgment, sent the request for their removal—the Committee recommended their removal from the roll of candidates, which is the actions of the Presbytery recorded in 127-26.

The Presbytery amended the minutes of the 127th meeting, to record the sufficient reason for the action: "on the sufficient ground provided by the Session that these 3 men were no longer pursuing the Gospel ministry." The action of removing them from candidacy was freshly communicated to the men through

the Session.

2024-09: Apr 27, 2023 (*BCO* 23-1) — Presbytery transferred a TE with no record of first dissolving his call or citing his church to appear.

Response [2025]: Since the request for dissolution of a pastoral relation was an uncontested one, it was handled by the Church and Ministerial Welfare Committee of the Presbytery, acting as a commission (per our By-law 1.054.e.1) during its meeting on 4/5/23, when both the TE and the church representative appeared to present their case, following a unanimous, uncontested congregational meeting of the church on 3/26/23 accepting the TE's resignation. The record of the commission's action was provided as an attachment to our minutes.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted the minutes of the congregational meeting at which the TE's resignation was accepted

Response [2026]: Presbytery amended the 127th minutes to record the act of dissolving the TE's pastoral relation per *BCO* 23-1, before dismissing him to another Presbytery (127-52), and the minutes of the congregational meeting at which the TE's resignation was accepted by the church were added to the appendix to the 127th minutes.

2025-01: General 2024 (*RAO* 16-3.c.6) — The minutes do not list the names of teaching and ruling elders who are present at any given meeting.The latter is particularly important should there be a complaint, protest, etc

Response [2026]: The Presbytery acknowledges its failure to provide a list specifying the TEs and REs present at our 2024 meetings. We have amended the minutes to include a full roll for each meeting where the information is available, and will give direct instructions to our new Stated Clerk to include the roll in all future minutes.

2025-02: Apr 25, 2024 (*BCO* 23-1) — No Record of congregational meeting to dissolve pastoral relations with TE [Name Omitted].

Response [2026]: We acknowledge that the motion in our minutes was worded inaccurately, with an incorrect *BCO* reference (*BCO* 23-1), so as to create confusion. The Teaching Elder was at the time serving a mission church as pastor, as called and appointed by the Presbytery (per *BCO* 5-4.a). His resignation was, therefore, to the Presbytery, who had called and appointed him to provide pastoral ministry for the mission church. There was, therefore, no need for a congregational meeting to dissolve the pastoral relation between him and the mission church.

2025-03: Apr 25, 2024 (*BCO* 18-2) — No record of endorsement by candidate's Session. No record of 6 month membership for candidate. Incomplete exam for candidate. Exam for candidate for ministry not

recorded; character and inward call.

Response [2026]: The candidate was endorsed by his Session and a member of [Church Omitted] for more than 6 months prior to his application for coming under care in accord with *BCO* 18-2. The candidate was examined both by the C&C Committee and on the floor at our Presbytery meeting on experiential religion and on his motives for seeking the ministry in accord with *BCO* 18-3, concluding with his being asked and affirming the questions of *BCO* 18-3, after which he was charged by the Moderator. The Presbytery acknowledges that its minutes fail to clearly specify these details, and to include sufficient documentation of endorsement and membership. We have amended our minutes to include that documentation, and we have instructed our new Stated Clerk on proper minutes keeping for future meetings.

2025-04: Apr 25, 2024 (*BCO* 13-6; *BCO* 46-6, *BCO* 13-7) — No record regarding the reception of a certificate of dismissal from the transferring presbytery. No record of examination of TE transferring into Presbytery.

Response [2026]: At the October 2023 meeting of the Wisconsin Presbytery, the TE was designated as honorably retired (*BCO* 23-2) by reason of age. At this same meeting, the presbytery moved to have the TE released for transfer to the Siouxlands Presbytery (*BCO* 46-6). We apologize for our failure to include the certificate of dismissal in our minutes, and have made this correction at the 135th presbytery meeting. Due to concerns about the TE's health condition and therefore his ability to go through normal examinations on the floor, he was examined on April 24, 2024, by a commission of the presbytery. On April 25, 2024, at the 130th stated meeting of the Siouxlands Presbytery, the commission reported on this examination on the floor.

2025-05: Apr 25, 2024 (*RAO* 16-3.e.5; *BCO* 21-4) — No record of ordination exam.

Response [2026]: The candidate, [Name Omitted], sustained his ordination examination at a previous presbytery meeting (September 22, 2022; see the Minutes of the 125th Stated Meeting of the Siouxlands Presbytery, 125.48–125.61). The candidate had not yet received a call, so was not ordained to a particular work until the April 25, 2024, meeting. We recognize that this was a unique case and will strive to be clearer in our documentation moving forward. The minutes have been amended to show that the ordination examination had already been completed.

2025-06: Apr 25, 2024 (*BCO* 5-3.c) — The man called to pastor the mission

church is not added to the temporary session to serve as moderator.

Response [2026]: As the pastor called to church planting, it was the understanding of the presbytery that by the nature of his office, the TE was to be included on the temporary session to serve as moderator (*BCO* 5-3c). The presbytery has amended the minutes to include the church planting pastor on the commission explicitly.

2025-07: Apr 25, 2024 (*BCO* 38-2) — Minutes recorded TE demitting from the office while 38-3 applies to removing membership.

Response [2026]: This was a clerical mistake. The TE was demitted from his office according to the process laid out in *BCO* 38-2 which has been amended in the minutes.

2025-08: Sep 26, 2024 (*RAO* 16-3.e.5) — No record of requiring statement of differences with our Standards.

Response [2026]: On the floor of presbytery, it was reported by the commission that examined this TE that this TE stated he had no differences with the standards. We apologize for failing to properly note this in our minutes; we have amended the minutes to state this clearly.

2025-09: Sep 26, 2024 (*BCO* 8-7) — Minutes should record which TE's are reporting for annual report.

Response [2026]: The Presbytery apologizes for failing to include the written annual reports from TEs laboring out of bounds in addition to the oral reports received at our meetings. We will obtain and attach to our minutes written annual reports moving forward.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-10: Sep 26, 2024 (*BCO* 18-2) — No record of a six-month membership for candidate.

Response [2026]: The Candidates and Credentials Committee had indeed received prior to his reception under care confirmation from the Session that [Name Omitted] was a member of [Church Omitted] for more than six months. We apologize for our failure to clearly document this in our records and will endeavor to more faithfully record required documentation in the future.

Rationale [2026]: No record that Presbytery corrected its record (*RAO* 16-10.b.1) indicating that the candidate was a member of [Church Name Omitted] for more than 6 months.

73. That the Minutes of **South Coast Presbytery:** *(59-0-0)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **Apr 29–30, 2025; Sep 23–24, 2025**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 13-9.b; 40-1) — No record of review of records of church Sessions.

2026-02: General 2025 (*BCO* 8-7) — No record of annual reports of TEs laboring out of bounds or without call.

2026-03: General 2025 (*BCO* 19-12) — Reports on every intern by the committee charged with the oversight of interns at each stated meeting not included.

2026-04: Jan 21–22, 2025 (*BCO* 23) — No record that previous call as assistant pastor was dissolved.

d. **That the following responses to the 53rd GA be found satisfactory:**

2021-01: Jan 26, 2019; May 4, 2019; Sep 24, 2019 (*BCO* 15-1; *RAO* 16-3.2.4) — Minutes of commission not entered in Presbytery minutes, and these must be presented for review next year.

Response [2022]: These minutes were received by our administrative commission and reported to the presbytery, but we failed to enter them into the minutes. We will revise our processes to include them in the future.

Rationale [2022]: When GA takes exception to a Presbytery's minutes for failure to record or take a required action, and Presbytery agrees with the exception, a satisfactory response should indicate that they have taken the required action, if possible, and properly recorded the same in their minutes, amending and resubmitting relevant portions of past minutes if necessary.

Response [2025]: We recognize this error, however due to the length of time the Administration Commission minutes from 2019 cannot be located. We've amended our process, and all Administration Commission minutes are located in the correct location, and will be included with the minutes of the stated meetings, and submitted to General Assembly for this upcoming year 2025.

Rationale [2025]: Presbytery has not provided minutes for review. Presbytery needs to do its best to recreate the missing minutes and produce them per *BCO* 40-4.

Response [2026]: Presbytery agrees with this exception. At this time, Presbytery has made diligent efforts to locate or reconstruct the missing commission minutes from 2019 in accordance with *BCO* 40-4 but has been unable to fully recover them. Presbytery has documented this deficiency in its records and has implemented procedures to ensure that all commission minutes are recorded, preserved, and included in presbytery minutes going forward. Presbytery regrets this deficiency and promises greater care in the future.

2024-01: General 2023 (*RAO* 16-10.a) — No record in minutes of exceptions taken by GA.

Response [2025]: No Response Received.

Response [2026]: Presbytery agrees with this exception. At this time we will locate these exceptions, if any, and include them.

2024-05: Jan 24–25, 2023 (*BCO* 31-2) — Presbytery treats a *BCO* 31-2 report as a motion and defeats the motion to begin an investigation. *BCO* 31-2 requires at least some investigation and that Presbytery demand satisfactory explanations from the one against whom the report is made. There is no record that this happened.

Response [2025]: The motion was made by a TE, and defeated, the TE subsequently demitted from office, and has left the PCA, no explanation was deemed necessary by the Presbytery, the report was slanderous in nature.

Rationale [2025]: *BCO* 31-2 calls for some degree of investigation and a ruling that there is or is not a strong presumption of guilt. Minutes need to reflect this decision and not simply be silent.

Response [2026]: Presbytery agrees with this exception. Presbytery acknowledges that its minutes did not reflect compliance with *BCO* 31-2. While the matter has since been rendered moot due to subsequent developments, Presbytery has corrected its procedures to ensure that all future *BCO* 31-2 matters include a recorded determination as to whether there is a strong presumption of guilt and that appropriate investigation is undertaken and recorded.

2024-08: Apr 24–26, 2023 (*BCO* 13-6; *BCO* 21-4) — Incomplete record of examination for minister seeking admission from another denomination.

Response [2025]: We recognize this inconsistency, however, this was a transfer from the KAPC, a NAPARC denomination, the exam was thorough, and covered all areas of our theology, we apologize for the lack of detail in the minutes, and while we can amend the minutes, and have, the TE is already ordained and serving in good standing in our presbytery.

Rationale [2025]: The record needs to reflect this was handled in accordance to *BCO* 13-6 and the record needs to be corrected.

Response [2026]: The Presbytery agrees with the exception. This is noted and we will ensure to include this information in future minutes. A marginal notation has been added to the original minutes referencing the corrective action.

2024-12: Jul 17, 2023 (*RAO* 16-3.e.7; *BCO* 13-11) — Minutes of Executive Session not included, and these must be submitted next year.

Response [2025]: No separate minutes were needed, per the Note to Clerk.

Rationale [2025]: Minutes of executive sessions are required to be provided for review.

Response [2026]: The Presbytery disagrees with this exception. The minutes and actions were outlined in lines 19-22 of our minutes.

2025-01: General 2024 (*BCO* 18-3; *BCO* 19-1) — No record that men being examined for candidacy and licensure were examined before presbytery.

Response [2026]: The presbytery disagrees with this exception. We Motion Second Carry (MSC) all of our men to approve their examination in the properly stated areas.

2025-03: Jan 23–24, 2024 (*BCO* 13-11; *RAO* 16-3.e.7) — Minutes of executive session not included.

Response [2026]: Presbytery disagrees with the exception. To clarify, the executive session was called to dismiss guests (visitors) at our Presbytery meeting to protect the discussion of the sensitive matter (item c, line 51). Only discussion was had, no action was taken, thus no minutes were recorded.

2025-04: Apr 23–24, 2024 (*BCO* 19-3) — No record of the questions for licensure being asked.

Response [2026]: Presbytery agrees with the exception. The man was in fact examined on the floor, however we failed to follow proper procedure outlined in *BCO* 19 (particularly 3 & 4). We have made amendments to the minutes and will correct future action.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2022-01: General 2021 (*RAO* 16-3.e.4) — Commission minutes not provided.

Response [2023]: Commission minutes will be provided in the future.

Rationale [2023]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted the minutes for review.

Response [2025]: We are unable to produce the commission minutes requested from 2019, and we recognize this error and apologize.

Rationale [2025]: Presbytery has not provided minutes for review. Presbytery needs to do its best to recreate the missing minutes and produce them per *BCO* 40-4.

Response [2026]: Presbytery agrees with this exception. Presbytery has reviewed its records and acknowledges that the requested commission minutes were not submitted. However, we do have all 2021 recorded commission minutes and will include them for review of the RPR. Presbytery regrets this deficiency and promises greater care in the future.

Rationale [2026]: Commission minutes not provided.

2022-05: Aug 14, 2021 (*BCO* 21-4; *RAO* 16-3.e.5) — Stated differences not judged with the prescribed categories.

Response [2023]: We apologize again, and will include the stated differences of ministers in the prescribed categories in the future.

Rationale [2023]: No record that Presbytery corrected its record (*RAO*

16-10.b.1). Presbytery has not submitted the candidate's stated difference in his own words for review.

Response [2025]: No Response Received.

Response [2026]: Presbytery agrees with this exception. We will work to remedy this in our minutes to reflect proper categories, and will work to ensure this does not happen in the future.

Rationale [2026]: Stated differences not judged with the prescribed categories.

2022-06: Aug 14, 2021 (*BCO* 13-6) — All specific requirements of transfer exam not recorded.

Response [2023]: We apologize for not including all the specific requirements of the transfer exam in the minutes, however, the Ordination Team does follow the requirements in the *BCO* for transfer exams, this will be noted in the minutes in the future.

Rationale [2023]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not amended the minutes of the meeting or submitted the required records for review.

Response [2025]: No Response Received.

Response [2026]: Presbytery agrees with this exception. We will remedy the error with amendments to our minutes. We promise to ensure proper specifications for transfer exams in the future.

Rationale [2026]: All specific requirements of transfer exam not recorded.

2023-03: Jan 25 2022; Mar 12, 2022 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes, and these must be presented for review next year.

Response [2024]: These minutes were received by our administrative commission and reported to the presbytery, but we failed to enter them into the minutes. We will revise our processes to include them in the future.

Rationale [2024]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted the minutes for review.

Response [2025]: [No response was received; however, the minutes have now been submitted.]

Response [2026]: Presbytery agrees with this exception. Presbytery has reviewed its records and acknowledges that the requested commission minutes were not submitted. However, we do have all 2022 recorded commission minutes and will include them for review of the RPR. Presbytery regrets this deficiency and promises greater care in the future.

Rationale [2026]: Minutes of commission not entered in Presbytery minutes, and these must be presented for review next year.

2023-05: Apr 26, 2022 (*BCO* 21-4; *RAO* 16-3.e.5) — Stated differences not judged with the prescribed categories.

Response [2024]: We apologize again, and will include the stated differences of ministers in the prescribed categories in the future.

Rationale [2024]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not judged the candidate's stated differences in the prescribed categories.

Response [2025]: No Response Received.

Response [2026]: Presbytery agrees with this exception. We will work to remedy this in our minutes to reflect proper categories, and will work to ensure this does not happen in the future.

Rationale [2026]: Stated differences not judged with the prescribed categories.

2023-07: Apr 26, 2022 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes, and these must be presented for review next year.

Response [2024]: We apologize for this, and will include commission minutes in the future.

Rationale [2024]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted the minutes for review.

Response [2025]: [No response was received; however, the minutes have now been submitted.]

Response [2026]: The presbytery recognizes and agrees with this exception. The AC minutes have been located and will be provided for review.

Rationale [2026]: Minutes of commission not entered in Presbytery minutes, and these must be presented for review next year.

2023-09: Sep 27, 2022 (*BCO* 21-4; *RAO* 16-3.e.5) — No record of requiring statement of differences with our Standards.

Response [2024]: The Presbytery apologizes for not recording the stated differences of minister's/candidates in their own words

Rationale [2024]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted the candidate's stated difference in his own words for review.

Response [2025]: No Response Received.

Response [2025]: [Presbytery did not submit a response, however, Presbytery did answer this exception in their response to exception 2023-01)

Response [2026]: Presbytery agrees with this exception. I will take time to locate any stated differences of the Ordained Men with our standards. For future ordinations, we will commit to identifying stated differences and include them in the minutes.

Rationale [2026]: No record of requiring statement of differences with our Standards.

2024-06: General 2023 (*BCO* 15-1; *BCO* 10-5; 13-11; *RAO* 16-3; *RONR* 9:30-

36) — The Administration Commission minutes do not conform to the requirements of the *BCO* and *RAO*. Further, the Administration Commission takes actions (approving and dissolving calls, establishing commissions, etc) via "electronic correspondence." This does not constitute a deliberative assembly. Further, there is no evidence that SCP's ByLaws allow electronic meetings, that quorums were present when those decisions were made, or that such actions were ever appropriately ratified.

Response [2025]: We apologize for this oversight, and while the bylaws do not outline how electronic meeting are to take place, this has been our practice from the beginning of the Admin Commission. We will work to bring the Administration Commission Minutes into the format required by the *BCO* and *RAO*.

Rationale [2025]: No corrective action has been taken also as a Commission this need to be a deliberative process and not just emails.

Response [2026]: Presbytery agrees with this exception. Presbytery will work to correct this by being more thorough, ensuring our assembly deliberates and operates with clarity in line with the stated standards.

Rationale [2026]: No corrective action has been taken, also as a Commission this need to be a deliberative process and not just emails.

2024-13: Sep 26–27, 2023 (*BCO* 15-1) — Commission report not attached to the minutes.

Response [2025]: Our process has been improved to include the commission reports.

Rationale [2025]: Reports needed to be provided for the year in question in addition to procedure moving forward.

Response [2026]: The presbytery recognizes this error. We will look to include these attachments into the minutes for future review.

Rationale [2026]: Commission report not attached to the minutes.

2024-14: Sep 26–27, 2023 (*BCO* 8-7) — Presbytery, on motion, dissolves a man's call to an out-of-bounds work without the concurrence of the man or the calling body, or even evidence of communication with the calling body, and with no evidence of formal process.

Response [2025]: We acknowledge this, and this is an ongoing matter that is yet to be resolved.

Rationale [2025]: No resolution or correction provided.

Response [2026]: Presbytery agrees with this exception. We will work to update our minutes to reflect the adequate formal process conducted during this presbytery meeting. Future minutes will reflect this.

Rationale [2026]: Presbytery, on motion, dissolves a man's call to an

out-of-bounds work without the concurrence of the man, and with no evidence of formal process.

2024-15: Sep 26–27, 2023 (*BCO* 21-4.e) — No record that Presbytery followed *BCO* 21-4.e (as amended in 2023) in conducting an ordination examination.

Response [2025]: The candidate does not take any exceptions, we apologize for this oversight, and have amended our minutes.

Rationale [2025]: *BCO* 21-4 requires more than determining exceptions to standards. The record must reflect *BCO* 21-4 was followed completely.

Response [2026]: Presbytery agrees with this exception. We will work to always examine Christian Character as part of the ordination exam and ensure that particular portion is reflected in future minutes.

Rationale [2026]: No record that Presbytery corrected its record.

2025-02: General 2024 (*BCO* 13-9.b; *BCO* 40-1) — No record of review of records of church Sessions.

Response [2026]: Presbytery agrees with this exception. At our next stated meeting, we will address this with our Presbytery and ask for volunteers to review records of sessions were reviewed in accordance with *BCO* 13-9.b and *BCO* 40-1. We will work to have this reflected in the future minutes.

Rationale [2026]: No record of review of records of church Sessions.

74. That the Minutes of **South Florida Presbytery:** *(59-0-1)*

a. Be approved without exception: **Feb 15, 2025; Aug 12, 2025; Nov 4, 2025**

b. Be approved with exception of form: **May 13, 2025**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 18-6) — Annual reports of candidates not included.

2026-02: General 2025 (*BCO* 19-12) — Annual reports of interns not included.

2026-03: General 2025 (*BCO* 19-12) — Reports on every intern by the committee charged with the oversight of interns at each stated meeting not included.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 (*BCO* 18-6) — Annual reports of candidates and not included.

Response [2026]: Presbytery agrees with this exception and regrets the error. Lamentably Presbytery has not been in the habit of seeking annual reports from our candidates. Presbytery apologizes for this past oversight and promises to be more diligent in this area moving forward.

2025-02: General 2024 (*BCO* 19-12) — Annual report of interns not included.

Response [2026]: Presbytery agrees with this exception and regrets the

error. Lamentably Presbytery has not rightly sought annual reports from our interns. Presbytery apologizes for this past oversight and promises to be more diligent in this area moving forward.

2025-03: General 2024 (*BCO* 19-12) — Reports on every intern by the committee charged with the oversight of interns at each stated meeting not included.

Response [2026]: Presbytery agrees with this exception and regrets the error. Lamentably Presbytery has not rightly sought reports on our interns for each stated meeting from the committee charged with oversight of interns. Presbytery apologizes for this past oversight and promises to be more diligent in this area moving forward.

2025-04: General 2024 (*BCO* 20-1; RAO16-3.e.6) — Specific arrangements of call not shown to be approved.

Response [2026]: Presbytery agrees with the exception and apologizes for the error. Presbytery distributes the written terms and arrangements of pastoral calls ahead of time. The specific arrangements are discussed on the floor of Presbytery, but the wording of our motions has not accurately reflected that we do approve the specific terms and arrangements of the call. Presbytery has corrected the record by a Motion to Amend Something Previously Adopted and has made a marginal notation in those minutes pointing to this response (attached). We will be more diligent in our recordkeeping in the future.

2025-05: General 2024 (*BCO* 15-1; RAO16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

Response [2026]: Presbytery respectfully disagrees with this exception. The exception refers to Presbytery's abolishing of its standing Judicial Commission by the removal of that provision from its Standing Rules. No cases or minutes of judicial commissions are outstanding.

2025-06: Feb 13, 2024 (*BCO* 38-3) — No record that presbytery made determinations required by *BCO* 38-3.

Response [2026]: Presbytery agrees with the exception and apologizes for the error. The chairman of the Credentials Committee reported the matter to Presbytery, and Presbytery did not approve the chairman's judgment that the TE's withdrawal was in accordance with *BCO* 38-3a. Presbytery has corrected the record by a Motion to Amend Something Previously Adopted in approving (as a whole body) that the TE's withdrawal was indeed according to *BCO* 38-3a and has made a marginal notation in those minutes pointing to this response (attached). We will be more diligent to make 38-3 determinations in the future.

2025-07: Nov 12, 2024 (*BCO* 8-7) — No record of annual reports of TEs laboring out of bounds or without call.

Response [2026]: Presbytery agrees with the exception and regrets the error. Lamentably Presbytery has not followed this practice in past years, but in 2024 we made a great effort to correct its past omission and conform to the *BCO* in this matter. We obtained annual reports from a majority of its TEs out-of-bounds and without call and included them in the record, but some did not respond in time. Presbytery is now seeking to bring the rest into full conformity with the *BCO* for the 2025 year. Presbytery apologizes for this past oversight and promises to be more diligent in this area moving forward.

e. **Standing Judicial Commission (SJC) Compliance:**

South Florida Presbytery has not met following the receipt of the SJC ruling. The review will be deferred to next year's Committee of Review of Presbytery Records (*BCO* 40-2.4; *OMSJC* 17.1.e-f).

2025-01 — Mullen v. South Florida

2025-12-13 — Assis and Brown v. South Florida

South Florida Presbytery recorded the full decision in their minutes and/or has provided a statement describing how the lower court has complied with any amends contained therein (*BCO* 40-2.4; *OMSJC* 17.1.e-f):

2024-16 — Mueller v. South Florida

75. That the Minutes of **South Texas Presbytery:** *(62-1-0)*

a. Be approved without exception: **Apr 25–26, 2025; Aug 8–9, 2025; Oct 24–25, 2025; Aug 9, 2025 (ES); Oct 25, 2025 (ES)**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Jan 24–25, 2025 (*BCO* 19-2; *RAO* 16-3.e.7) — Stated differences not recorded in the candidate's own words.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-02: Apr 26–27, 2024 (*BCO* 15-2; *RAO* 14-2) — Presbytery gave commission-like power to a single individual to appoint representatives to a Committee of Commissioners. Representatives to Committees of Commissioners must be elected by Presbytery or a commission thereof.

Response [2026]: The Presbytery agrees with exception and acknowledges its error in granting to a single individual the authority to appoint representatives to committees of commissioners to General Assembly.

The Presbytery will change its practice to authorize only a properly constituted commission of the Presbytery to make such appointments when the need arises.

2025-03: Aug 9–10, 2024 (*BCO* 13-2) — No record of TE laboring out of bounds with concurrence of Presbytery within whose bounds he labors.

Response [2026]: The Presbytery agrees with the exception and

acknowledges its error in failing to seek and record the full concurrence of the presbytery in which a member of the Presbytery is laboring out of bounds. The concurrence of the presbytery where this minister is laboring was subsequently obtained.

The Presbytery has corrected its record by a motion to Amend Something Previously Adopted to reflect that the concurrence was obtained and has made a marginal notation in the original minutes reflecting this response.

2025-04: Oct 25–26, 2024 (*BCO* 13-6; 19-2.f; 21-4.g; *RAO* 16-3.e.6) — A candidate's difference with the Standards' teaching on creation must be stated in the minutes of Presbytery in the candidate's own words.

Response [2026]: The Presbytery respectfully disagrees with the exception and is of the view that the exception is not well taken. The stated difference of the candidate in his own words was recorded in the minutes.

The Presbytery respectfully refers the exception back to the General Assembly.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-01: Jan 26–27, 2024 (*BCO* 21-4; *RAO* 16-3.e.6) — Stated differences not recorded in the candidate's own words.

Response [2026]: The Presbytery agrees with the exception and acknowledges its error in failing to have the stated differences of a candidate for ordination (including one who has previously been licensed) with the Confession of Faith and Catechisms recorded in the candidate's own words and judged by the Presbytery. The Presbytery has changed its practice to require this in all instances for ministers and ministerial candidates.

The Presbytery has corrected its record by a motion to Amend Something Previously Adopted to reflect that the Presbytery was advised of the stated differences of the candidate at the meeting and to record the differences in a marginal notation to the original minutes reflecting this response. The Presbytery has also reaffirmed that the differences are more than semantic but not out of accord with any fundamental of our system of doctrine.

Rationale [2026]: Missing stated difference in the candidate's own words (and Presbytery's judgment) must be recorded in the minutes and supplied to RPR for review.

76. That the Minutes of **Southeast Alabama Presbytery:** *(61-0-0)*

a. Be approved without exception: **None.**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Jan 28, 2025 (*BCO* 13-4; RONR 40) — No record that Presbytery examined concerning the requirements of *BCO* 21-4.e.

2026-02: Jan 28, 2025 (*BCO* 21-4.c.4) — No record of ¾ vote required for preaching to be heard by committee and not entire presbytery.

2026-03: Jan 28, 2025 (*BCO* 23-1) — No record that Congregation or Session (for Assistant) was cited to appear before Presbytery.

2026-04: Apr 22, 2025 (*BCO* 21-4.c.4; *RAO* 16-3.e.5) — No record of ¾ vote required for preaching to be heard by committee and not entire presbytery.

2026-05: Apr 22, 2025 (*BCO* 21-4.e; *RAO* 16-3.e.6) — No record that Presbytery examined concerning the requirements of *BCO* 21-4.e.

2026-06: Apr 22, 2025 (*BCO* 21.4.b) — No record of approval of knowledge of Greek and Hebrew languages.

2026-07: Apr 22, 2025 (*BCO* 18-2) — No record of endorsement by candidates Session.

2026-08: Apr 22, 2025 (*BCO* 18-2) — No record of 6 months membership for candidate.

2026-09: Aug 26, 2025 (*BCO* 21-4.c.4) — No record of ¾ vote required for preaching to be heard by committee and not entire presbytery.

2026-10: Aug 26, 2025 (*RAO* 16-3.e.6; *BCO* 21-4.e) — No record that Presbytery examined concerning the requirements of *BCO* 21-4.e.

2026-11: Oct 28, 2025 (*BCO* 13-6) — Incomplete record of examination of TE transferring into presbytery.

2026-12: Oct 28, 2025 (*BCO* 21-4.e; *RAO* 16-3.e.6) — No record that Presbytery examined concerning the requirements of *BCO* 21-4.e.

2026-13: Oct 28, 2025 (*BCO* 19-2; *RAO* 16-3.e.5) — All specific requirements of licensure exam not recorded.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: General 2024 (*BCO* 13-2) — No record of annual report(s) of TE(s) laboring out of bounds.

Response [2026]: We agree with this exception. The TEs who labor out of bounds with MMI, CURE, The Owens Center, and Campus Outreach do report regularly on the floor of Presbytery, but we have some men from whom we failed to get a report. Since we did not get a report from these men in 2024, we cannot correct our records, but we corrected our actions by receiving a report from these men at our October 28, 2025 meeting.

2025-02: General 2024 (BCO8-8) — No record of annual report(s) of TE(s) serving as chaplains.

Response [2026]: We agree with this exception. Since we did not get a report from these men in 2024, we cannot correct our records, but we corrected our actions by receiving a report from these men at our October 28, 2025 meeting.

2025-03: General 2024 (*BCO* 18-6) — Annual reports of candidates not included.

Response [2026]: We agree with this exception. These reports were received, but never given on the floor of Presbytery at our October meeting. We will correct our actions by giving this report at our October 2025 meeting, along with the annual report for 2025.

2025-04: General 2024 (*BCO* 19-12) — Annual report of interns not included.

Response [2026]: We agree with this exception. These reports were received, but never given on the floor of Presbytery at our October meeting. We will correct our actions by giving this report at our October 2025 meeting, along with the annual report for 2025.

2025-09: Apr 24, 2024 (*BCO* 19-2.f; *RAO* 16-3.e.6) — No record of requiring statement of differences with our Standards.

Response [2026]: We agree with this exception. At the October 28, 2025 meeting of Presbytery, the previously adopted minutes of April 24, 2024 were corrected with the following language:

II.E.2. - Corrected to show that Mr. [Name Omitted] was only examined for licensure, and not ordination.

II.E.2.c-2 "That Mr. [Name Omitted] stated no differences with our standards."

2025-10: Apr 24, 2024 (*BCO* 21-4; *RAO* 16-3.e.5) — Stated difference not judged with the prescribed categories

Response [2026]: We agree with this exception. At the October 28, 2025 meeting of Presbytery, the previously adopted minutes of April 24, 2024 were corrected with the following language:

"The court judged the stated difference(s) to be more than semantic, but “not out of accord with any fundamental of our system of doctrine” (*BCO* 19-2; 21-4)"

2025-11: Aug 27, 2024 (*BCO* 23-1) — No record that the congregation (/Session) was cited to appear before the presbytery.

Response [2026]: We agree with the exception that we did not cite the congregation to appear. However, representatives from the congregation were present and did not contest the dissolution. We also have the minutes of the congregational meeting wherein the congregation dissolved the relationship and those have been forwarded to Review of Presbytery Records. Going forward, Presbytery will be more diligent in including those records in our minutes.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2025-05: Jan 23, 2024 (*BCO* 18-2) — No record of endorsement by candidate's Session.

Response [2026]: We agree with this exception. The action was taken by the committee but not recorded in our minutes. At the October 28, 2025 meeting of Presbytery, the previously adopted

minutes of January were corrected with the following language: "Mr. [Name Omitted] and Mr. [Name Omitted], having met the requirements of *BCO* 18-2 and having been examined/questioned in accord with *BCO* 18-3, were received under care of SEAL Presbytery, as moved by the Committee and approved by Presbytery."

Rationale [2026]: Need to specifically acknowledge receipt of endorsement. Your record now reflects examined/questioned. This does not clearly reflect receipt of Session endorsement.

2025-06: Jan 23, 2024 (*BCO* 18-2) — No record of six months membership for candidate.

Response [2026]: We agree with this exception. The action was taken by the committee but not recorded in our minutes. At the October 28, 2025 meeting of Presbytery, the previously adopted minutes of January were corrected with the following language: "Mr. [Name Omitted] and Mr. [Name Omitted], having met the requirements of *BCO* 18-2 and having been examined/questioned in accord with *BCO* 18-3, were received under care of SEAL Presbytery, as moved by the Committee and approved by Presbytery."

Rationale [2026]: Need to specifically acknowledge verification of 6 months membership. Your record now reflects examined/questioned. This does not clearly reflect candidates' 6 months membership.

2025-07: Jan 23, 2024 (*BCO* 18-2) — No record of endorsements by sessions of men coming under care

Response [2026]: We agree with this exception. The action was taken by the committee but not recorded in our minutes. At the October 28, 2025 meeting of Presbytery, the previously adopted minutes of January were corrected with the following language: "Mr. [Name Omitted] and Mr. [Name Omitted], having met the requirements of *BCO* 18-2 and having been examined/questioned in accord with *BCO* 18-3, were received under care of SEAL Presbytery, as moved by the Committee and approved by Presbytery."

Rationale [2026]: Need to specifically acknowledge receipt of endorsement. Your record now reflects examined/questioned. This does not clearly reflect receipt of Session endorsement.

2025-08: Jan 23, 2024 (*BCO* 18-2) — No record of six months membership for candidate.

Response [2026]: We agree with this exception. The action was taken by the committee but not recorded in our minutes. At the October 28, 2025 meeting of Presbytery, the previously adopted minutes of January were corrected with the following language: "Mr. [Name Omitted] and Mr. [Name Omitted], having met the

requirements of *BCO* 18-2 and having been examined/questioned in accord with *BCO* 18-3, were received under care of SEAL Presbytery, as moved by the Committee and approved by Presbytery."

Rationale [2026]: Need to specifically acknowledge verification of 6 months membership. Your record now reflects examined/questioned. This does not clearly reflect candidates' 6 months membership.

77. That the Minutes of **Southern Louisiana Presbytery:** *(63-0-0)*
    a. Be approved without exception: **Jan 25, 2025; Apr 26, 2025; Apr 26, 2025 (ES); Jun 3, 2025; Oct 25, 2025**
    b. Be approved with exception of form: **None.**
    c. Be approved with exception of substance: **None.**

78. That the Minutes of **Southern New England Presbytery:** *(63-0-0)*
    a. Be approved without exception: **Jan 18, 2025; Mar 19, 2025; Apr 25–26, 2025; May 20, 2025; Jun 5, 2025; Sep 20, 2025**
    b. Be approved with exception of form: **None.**
    c. Be approved with exception of substance: **None.**
    d. **That the following responses to the 53rd GA be found satisfactory:**
    2025-01: Apr 26–27, 2024 (*BCO* 8-7) — No record that the presbytery is assured that an out of bounds TE will have full freedom to maintain and teach the doctrine of our church.
    Response [2026]: Presbytery agrees with the exception and promises to be more careful in the future. During the examination of TE [Name Omitted] Presbytery received assurance that TE [Name Omitted] would have full freedom to teach the doctrines of the church; however, this was not noted in the minutes.

79. That the Minutes of **Southwest Florida Presbytery:** *(63-0-0)*
    a. Be approved without exception: **Feb 8, 2025; Apr 3, 2025; Jun 19, 2025**
    b. Be approved with exception of form: **May 13, 2025; Sep 13, 2025; Nov 11, 2025**
    c. Be approved with exception of substance: **None.**

80. That the Minutes of **Suncoast Florida Presbytery:** *(62-0-0)*
    a. Be approved without exception: **May 13, 2025; Jul 24, 2025; Nov 4, 2025; Dec 12, 2025**
    b. Be approved with exception of form: **None.**
    c. **Be approved with exception of substance:**
    2026-01: General 2025 (*BCO* 8-7) — No record of annual report(s) of TE(s) laboring out of bounds.
    2026-02: Feb 11, 2025 (*BCO* 15-1; *RAO* 16-3.e.4) — Minutes of commission not entered in Presbytery minutes.

2026-03: Sep 9, 2025 (*BCO* 15-1) — Committee exercised authority as commission to approve a call without authorization from Presbytery.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Feb 13, 2024 (*BCO* 13-10) — No record of transfer or dismissal of members upon dissolving a church.

Response [2026]: The Presbytery notes the irregularity of this action and will endeavor to be more careful in the future. A note has been added to the Feb. 13, 2024, reference stating: "There were no members of this mission work."

2025-02: May 14, 2024 (*BCO* 34-10) — No record of 2/3 vote to divest without censure.

Response [2026]: The Presbytery regrets the oversight of this action. A note was added to the May 14, 2024, reference stating: "The vote was unanimous."

81. That the Minutes of **Susquehanna Valley Presbytery:** *(61-0-1)*

a. Be approved without exception: **Jan 11, 2025; Mar 29, 2025; Nov 15, 2025**

b. Be approved with exception of form: **None.**

c. **Be approved with exception of substance:**

2026-01: Feb 8, 2025 (*BCO* 21-4; *RAO* 16-3.e.7) — Stated differences not judged with the prescribed categories.

2026-02: May 17, 2025 (*BCO* 21-4; *RAO* 16-3.e.7) — Stated differences not judged with the prescribed categories.

2026-03: Sep 23, 2025 (*BCO* 21-4; *RAO* 16-3.e.5) — Incomplete record of ordination exam.

d. **That the following responses to the 53rd GA be found satisfactory:**

2024-02: Feb 11, 2023 (*BCO* 8-7) — No record that the Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church.

Response [2025]: We acknowledge our neglect in this matter and will be diligent to ensure going forward that men receiving an out of bounds call have the full freedom to maintain and teach the doctrines of our church.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1) Presbytery has not recorded receipt of an appropriate letter of assurance for the out-of-bounds work.

Response [2026]: We concur and have provided a letter from the oversight agency of TE [Name Omitted] affirming his freedom to maintain and teach the doctrines of the PCA. See the accompany document.

2025-01: Sep 17, 2024 (*BCO* 23-1) — No record that Congregation concurred with dissolution of pastoral relations.

Response [2026]: From our minutes: M/S/C to transfer TE [Name Omitted] to Blue Ridge Presbytery (Virginia). TE [Name Omitted] has been examined by Blue Ridge and is approved

pending our release of him.

Response: TE [Name Omitted] was designated honorably retired at the November 18, 2023 stated meeting of presbytery upon the request of TE [Name Omitted] and the [Church Name Omitted] congregation and made effective December 31, 2023. TE [Name Omitted]'s request to have his pastoral relationship dissolved with [Church Name Omitted] was approved at a properly called congregational meeting on October 29, 2023.

2025-02: Sep 17, 2024 (*BCO* 46-6) — No record regarding the reception of a certificate of dismission from transferring presbytery (may be accomplished through Clerks portal).

Response [2026]: From our minutes: M/S/C to transfer TE [Name Omitted] to Blue Ridge Presbytery (Virginia). TE [Name Omitted] has been examined by Blue Ridge and is approved pending our release of him.

Response: This transfer was completed by communication between presbytery clerks and confirmed in the clerk's portal.

e. **Standing Judicial Commission (SJC) Compliance:**

Susquehanna Valley Presbytery recorded the full decision in their minutes and/or has provided a statement describing how the lower court has complied with any amends contained therein (BCO 40-2.4; OMSJC 17.1.e-f):

2024-28 — MacRae v. Susquehanna Valley

82. That the Minutes of **Tennessee Valley Presbytery:** *(63-0-0)*

a. Be approved without exception: **Aug 12, 2025**

b. Be approved with exception of form: **May 10, 2025; Oct 28, 2025**

c. **Be approved with exception of substance:**

2026-01: General 2025 (BCO8-7) — No record of annual report(s) of TE(s) laboring out of bounds.

2026-02: General 2025 — Minutes of commission(s) not entered in presbytery minutes.

2026-03: Feb 8, 2025 (BCO8-7) — No record that Presbytery is assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church. No record that out-of-bounds TE is engaged in preaching and teaching the Word.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Feb 10, 2024 (*BCO* 15-2) — No record of commission report.

Response [2026]: TVP regrets the omission of the February 10, 2024 Commission Minutes for the installation of [Name Omitted] and hereby corrects the omission by including them here (Appendix ___) with notation in our previous minutes and by sending them for review by RPR.

e. **That the following responses to the 53rd GA be found unsatisfactory, therefore new responses shall be submitted to the following GA:**

2023-03: Jan 8, 2022 (*BCO* 8-7; 20-1) — No record that the Presbytery is

assured that an out-of-bounds TE will have full freedom to maintain and teach the doctrine of our Church. No record of the reasons why Presbytery considers an out-of-bounds work to be a valid Christian ministry.

Response [2024]: We erred by not making sure the call had language guaranteeing that TE will have full freedom to maintain and teach the doctrine of our Church. We erred by not recording the reasons why we consider the work of a chaplain to be a valid Christian ministry

Rationale [2024]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Presbytery has not submitted the minutes for review.

Response [2025]: TVP apologizes for this oversight and thanks the Assembly for its diligent review. Our clerk responded in 2023, "We erred by not making sure the call had language guaranteeing that TE will have full freedom to maintain and teach the doctrine of our Church. We erred by not recording the reasons why we consider the work of a chaplain to be a valid Christian ministry." We have included this response for approval at our Feb. 2025 Stated Meeting with the addition that we will be more diligent to include this information in the future.

Rationale [2025]: No record that Presbytery corrected its record (*RAO* 16-10.b.1). Document mentioned in response not provided for review.

Response [2026]: (TVP has not yet approved a correction in this matter, but will seek to do so at our May 2, 2026 Stated Meeting. We will forward that to you immediately upon approve.)

Rationale [2026]: No record that Presbytery corrected its actions (*RAO* 16.10.b.1)

83. That the Minutes of **Tidewater Presbytery:** *(64-0-0)*

a. Be approved without exception: **May 8, 2025**

b. Be approved with exception of form: **Feb 1, 2025**

c. **Be approved with exception of substance:**

2026-01: General 2025 (*BCO* 15-2) — SR 5.3.b.5 assigns responsibility "To carry out the provisions of *BCO* 21" to Membership Committee, whereas Presbytery itself must conduct ordination examinations.

2026-02: Oct 2, 2025 (*BCO* 19-9) — No record of examination of inward call to the ministry of the Word for internship.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Feb 3, 2024 (*BCO* 18.2) — No record of six months membership for candidate.

Response [2026]: Presbytery understands this exception. Due to a

technical error, a draft copy of the electronic minutes were uploaded to RPR. The final approved and printed editions of the minutes note the six month requirement. The record was clarified at the stated meeting held on Oct 2, 2025.

2025-02: Feb 3, 2024 (*WCF* 24.3; *BCO* 21-4.g; *RAO* 16-3.5) — It appears that the Presbytery incorrectly judged that a stated difference is not out of accord with any fundamental of our system of doctrine because the difference is neither hostile to the system nor strikes at the vitals of religion: “Regarding *WCF* 24.3 (‘papists’): I believe that a Roman Catholic can be ‘in the Lord,’ and so if they profess faith in Christ, it is not sinful for a protestant to marry them.”

Response [2026]: Presbytery understands the need for more information. At the stated meeting on Oct 2, 2025, the presbytery received from this TE a revision/expansion of this stated difference and judged it to be more than semantic but not out of accord with our system of doctrine. In his own words, his revised exception is: Regarding *WCF* 24.3 ('papists'): Roman Catholic (RC) doctrine is flatly wrong on justification (among other things). If the Divines intend "papist" to refer to someone who holds to the RC system of doctrine, I agree that believers should not marry papists. However, there are certainly Catholics today who believe that they are justified by faith alone in the finished work of Jesus Christ, which makes them inconsistent and out of line with the doctrines of the Roman Catholic Church (RCC). Though misguided, these individuals who trust in Jesus alone are real brothers and sisters in Christ (or "in the Lord" as *WCF* 24.3 says). At a minimum, it is unwise for a protestant and a Catholic to marry, and pastors should commend the true reformed faith, not encourage people to move to or join the RCC by marriage or otherwise. However, I can imagine a situation where a protestant and a Catholic who is "in the Lord" could marry without sin. For this reason, I'd prefer *WCF* 24.3 to use the more biblical language of "unbelievers" rather than specifying "infidels, papists, and other idolators."

2025-03: Aug 17, 2024 (BCO13-12) — No record of notice of called meeting with 10 day notice in the record.

Response [2026]: Presbytery agrees with this exception. The notice requirements of *BCO* 13-12 were met for this called meeting but were omitted from the record. The record was corrected at the stated meeting held on Oct 2, 2025.

84. That the Minutes of **Warrior Presbytery:** *(62-1-0)*

a. Be approved without exception: **Feb 13, 2025; Feb 13, 2025 (ES); Apr 15, 2025 (ES); Jul 3, 2025**

b. Be approved with exception of form: **Jan 25, 2025; Apr 15, 2025; Oct 21, 2025**

c. Be approved with exception of substance: **None.**

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Apr 20, 2024 (PP 6) — No record that members of interim/provisional Session were called by the congregation.

Response [2026]: Warrior Presbytery respectfully disagrees with this exception. At the request of [Church Omitted] only RE, Warrior Presbytery approved the creation of the provisional session at the April 2024 meeting, but they did not serve in this capacity due to the congregation of [Church Omitted] failing to approve them. This was first due to delays in gathering the church members for a congregational meeting and then, when they held a congregational meeting in April 2025, they did not approve the provisional session due to questions the congregation had regarding the powers of the provisional session. This failure to approve the provisional session is the reason no minutes were ever submitted by the provisional session for review by Warrior Presbytery during the April 2024-October 2025 period. As of October 2025, the congregation has not held another meeting to approve the provisional session.

2025-02: Jun 6, 2024 (*BCO* 46-6) — No record regarding the reception of a certificate of dismission from transferring presbytery (May be accomplished through Clerks portal).

Response [2026]: Warrior Presbytery agrees with this exception and apologizes for the error. The TE was released from Lowcountry Presbytery in June 2024. Warrior corrected the record at our October 2025 meeting.

85. That the Minutes of **West Hudson Presbytery:** *(62-0-0)*

a. Be approved without exception: **Nov 13, 2025**

b. Be approved with exception of form: **Sep 18, 2025**

c. **Be approved with exception of substance:**

2026-01: Feb 13, 2025 (*BCO* 22-4; 23-1) — No record that Session was cited to appear before Presbytery for the dissolution of pastoral relations nor a record of Session pertaining to the dissolution.

2026-02: May 29, 2025 (*BCO* 23-1) — No record that congregation was cited to appear before Presbytery for the dissolution of pastoral relations.

d. **That the following responses to the 53rd GA be found satisfactory:**

2025-01: Feb 8, 2024 (*BCO* 8-7) — No record that TE laboring as an interim in an EPC church will have the full freedom to maintain and teach the full doctrine of our church.

Response [2026]: Presbytery agrees with the exception. The record has been corrected to confirm that the TE laboring out of bounds as interim pastor at an EPC church was assured of full freedom to

maintain and teach the full doctrine of our church.

86. That the Minutes of **Westminster Presbytery:** *(63-0-0)*
    a. Be approved without exception: **Mar 8, 2025; Apr 26, 2025; Aug 9, 2025; Nov 8, 2025**
    b. Be approved with exception of form: **None.**
    c. Be approved with exception of substance: **None.**
    d. **Standing Judicial Commission (SJC) Compliance:**
    Westminster Presbytery recorded the full decision in their minutes and/or has provided a statement describing how the lower court has complied with any amends contained therein (*BCO* 40-2.4; *OMSJC* 17.1.e-f):
        2024-01 — Moehn v. Westminster

87. That the Minutes of **Wisconsin Presbytery:** *(64-0-0)*
    a. Be approved without exception: **Oct 25, 2025; Oct 25, 2025 (ES); Jul 26, 2025 (ES)**
    b. Be approved with exception of form: **Jan 25, 2025; Apr 26, 2025; Jul 26, 2025**
    c. Be approved with exception of substance: **None.**
    d. **That the following responses to the 53rd GA be found satisfactory:**
    2025-01: 27 Jan, 2024 (*BCO* 18-2) — No record of six months membership of candidate.
        Response [2026]: The Presbytery agrees with the exception, has voted to correct its minutes from January 27, 2024, to reflect that the Candidate had been a member of the Church since June 4, 2023. The Presbytery promises to be more careful in the future.
    e. **Standing Judicial Commission (SJC) Compliance:**
    Wisconsin Presbytery recorded the full decision in their minutes and/or has provided a statement describing how the lower court has complied with any amends contained therein (*BCO* 40-2.4; *OMSJC* 17.1.e-f):
        2024-18 — Harris v. Wisconsin

XI. Officers Elected for 2026-2027

Chairman	TE Stephen O'Neill
Vice-Chairman	TE Freddy Fritz
Secretary	TE Thomas Rickard
Assistant Secretary	TE Ben Thomas

XII. Roster of Members Present

Arizona	TE	Joshua Harp
Ascension	TE	Jared Nelson
Calvary	TE	Tom Buiter
Canada West	RE	Eric Nederlof
Catawba Valley	TE	Steve Stout
Central Carolina	TE	Will Keyton

1	Central Florida	TE	Scott Hunt
2	Central Georgia	RE	Jim Hildebrand
3	Central Indiana	TE	Nate Osner
4	Chesapeake	RE	Bradley Chwastyk
5	Chicago Metro	TE	Erik Oldfather
6	Covenant	TE	Doug Barcroft
7	Eastern Canada	TE	Sherman Wong
8	Eastern Pennsylvania	TE	Taylor Bradley
9	Fellowship	TE	Ben Thomas (Assistant Secretary)
10	Georgia Foothills	TE	Eddie Lim
11	Great Lakes	TE	Elliott Pinegar
12	Gulf Coast	TE	Stephen Tipton (Chairman)
13	Heartland	RE	Peter Griffith
14	Heritage	TE	Steve Coward
15	Highlands	TE	Jim Curtis
16	Hills and Plains	TE	Aaron Raines
17	Houston Metro	RE	Ryan Bowling
18	James River	TE	Marty Cates
19	Korean Capital	TE	David Bae
20	Korean Central	TE	Brian Park
21	Korean Northeastern	TE	Paul Lee
22	Korean Southwest	TE	Caleb Her
23	Metro Atlanta	TE	Coleman Erkens
24	Metropolitan New York	TE	Jim Fredere
25	Mississippi Valley	RE	Steven Holman
26	Missouri	RE	Ken Leslie
27	Nashville	TE	Ryan Hudson
28	New Jersey	TE	Stephen O'Neill
29	New River	TE	Dennis Bills
30	North Florida	TE	Tommy Park
31	North Texas	TE	Donny Friederichsen
32	Northern Illinois	TE	Wes White
33	Northern New England	TE	Tom Powell
34	Northwest Georgia	TE	Job Dalomba
35	Ohio	TE	Samuel Thoman
36	Ohio Valley	TE	Larry Hoop
37	Pacific	RE	Randy Berg
38	Pacific Northwest	TE	Adam Parker
39	Palmetto	TE	Andrew Davis
40	Pee Dee	RE	Paul Goodrich
41	Piedmont Triad	TE	Jacob Morrison
42	Platte Valley	TE	Andrew Lightner
43	Providence	TE	Jacob Hale
44	Rocky Mountain	TE	Del Farris
45	Savannah River	TE	Evan Gear

1	Siouxlands	TE	Dan Brendsel
2	South Coast	TE	James Kwak
3	South Florida	TE	Robbie Crouse
4	Southeast Alabama	TE	Reed DePace
5	Southern Louisiana	TE	Alec Moyer
6	Southern New England	RE	Chris Shoemaker
7	Southwest Florida	TE	Freddy Fritz (Vice-Chairman)
8	Suncoast Florida	TE	David Stewart
9	Susquehanna Valley	TE	Erik Swanson
10	Tennessee Valley	RE	Albert Leavengood
11	Tidewater	TE	Jason Schubert
12	Warrior	TE	Brett Frey
13	Westminster	TE	Thomas Rickard (Secretary)
14	Wisconsin	RE	Jim Hayes

This page intentionally left blank.

REVIEW OF PRESBYTERY RECORDS

MINORITY REPORT
on Recommendation X.46: Nashville Presbytery

(Regarding Revising a Presbytery's Judgment of the Withdrawal of a Gospel Minister to another Denomination according to *BCO* 38-3)

Background: The CRPR began citing the Nashville Presbytery with an exception of substance for releasing a Teaching Elder to The Episcopal Church in response to its 2024 minutes, stating that Nashville misjudged the withdrawal by utilizing *BCO* 38-3.a instead of *BCO* 38-3.b. Nashville responded that this judgment was the right of the Presbytery as the court of original jurisdiction according to *BCO* 38-3, and that it exercised this judgment with great discernment and caution and having in no way transgressed the Constitution of the PCA.

Motion of the Minority Report

We, the minority, move the following to be adopted as a substitute motion to Recommendation X.46 on the Nashville Presbytery by RPR:

That the CRPR Report for the Nashville Presbytery be approved with the following substitutions:

1. That the response to the exception of substance on Feb 13, 2024 (2025-01, found on p. 1529–1532) be found satisfactory, and thus, requires no further action.

Rationale for Minority Report

Assertion 1: *BCO* 38-3.b clearly states that the judgment of the body to which a man seeks to affiliate, as well as the judgment of the man himself, is to be made by the court of original jurisdiction.

This right is given to the local court for obvious reasons. It is the local court, in this case the Presbytery, which has the most knowledge of the minister and of the circumstances surrounding his affiliation. These matters can be difficult to discern from afar and should be left to the local court to act upon with great discretion and wisdom based on the full view of the facts. The duty of this judgment lies with the Presbytery, and the Nashville Presbytery exercised this right responsibly.

Assertion 2: According to *BCO* 38-3.b, it is the task of the Presbytery to judge the "body" with which the minister is affiliating.

In this case, the minister in question (hereinafter referred to as "the teaching elder") was withdrawing from the PCA to affiliate with the Episcopal Diocese of Florida. According to the Constitution and Canons of the Episcopal Church, the court of original jurisdiction for priests in the Episcopal Church is the Diocese. Canon I.13.1 states that every clergyman belongs to the Church in the Diocese in which he serves. Furthermore, Canon III.8.7 and Canon III.10.4 describe men seeking ordination in the Episcopal Church, including those men transferring from other denominations, as being ordained and received in the Diocese by the Bishop, which the teaching elder clearly understood according to his letter to the Nashville Presbytery. Therefore, in the case of the teaching elder, the "body" with which he was seeking

to affiliate was the Episcopal Diocese of Florida by nature of his call to [Church Name Omitted] within the jurisdiction of that Diocese under the authority of then Bishop [Name Omitted]. Bishop [Name Omitted] is judged by all accounts to maintain an orthodox view of the Scriptures and to maintain the Sacraments in their fundamental integrity. He has been publicly impugned by liberal Episcopalians for his firm stance and orthodox biblical teaching on human sexuality and marriage. He has been affiliated with the Communion Partners, a conservative evangelical group in the Episcopal Church which opposed the 77th General Episcopal Convention's decision to authorize the blessing of same-sex marriages in 2012. Bishop [Name Omitted] has also been featured in the conservative publication The Living Church for his conservative, orthodox stances in governing his Diocese. In the debates over this citation, much was made about concerns men have about the Episcopal Church broadly. We, the minority, share those concerns. However, as previously stated *BCO* 38-3 specifies that judgment is made on the "body" which the man is joining. In this case, that body is the Episcopal Diocese of Florida, which clearly maintains the Word and Sacraments in their fundamental integrity. Furthermore, in addition to seeking to affiliate with a conservative Diocese with a recent history of being led by a conservative evangelical bishop, the teaching elder received a particular call to serve as Associate Rector at [Church Name Omitted] in Jacksonville, Florida. [Church Name Omitted] is a Gospel preaching, evangelical parish. By the teaching elder's own account, while "the Episcopal Church is an embattled denomination… I've had the blessing of walking alongside many faithful, orthodox priests committed to God's Word, the redemption of His church, and His people." Therefore, taking all the above information into account, the Nashville Presbytery judged that the teaching elder was affiliating with a "body" that maintains the Word and Sacraments in their fundamental integrity (i.e., a true branch of the Church).

Assertion 3: *BCO* 38-3 requires a judgment not only of the body with which a minister seeks to affiliate but a judgment of the minister himself.

BCO 38-3.b cites a condemnation of both the body and the man who seeks to withdraw. In *Our Bond of Union: A Commentary on the BCO of the PCA,* Per Almquist states that inflicting 38-3.b is to judge that "they are no longer recognized as [a] member of the Church." (Almquist, 326) By the teaching elder's own account: "It is important you know I do not make this move lightly, without prayer, or without seeking wise counsel. My theological convictions, views on scripture, salvation, and the finished work of Christ have not changed. However, where the Lord is calling me to proclaim these truths has." This is certainly the statement of a man who is committed to the Gospel of Jesus Christ and seeks to be a faithful witness to the community in which he has been called to serve.

Conclusion

I. The Nashville Presbytery acted in accordance with the rights and responsibilities provided to it by the *Book of Church Order*, and in no way transgressed the Constitution of the PCA by taking this action.
II. *BCO* 38-3 requires that the court of original jurisdiction regarding a member or officer withdrawing from the PCA should make two judgments: [1] whether the "body" to which the member or officer is withdrawing maintains the Word and Sacraments in

their fundamental integrity (i.e., a true branch of the Church, *BCO* 2-2), and [2] whether the "member or officer" in question is deemed to be a member of the Church.

III. The Nashville Presbytery exercised its right to make these judgments responsibly and with great discernment. Therefore, its decision should be upheld.

Minority Report Signers

TE David Bae	Korean Capital Presbytery
RE Randy Berg	Pacific Presbytery
TE Martin Cates	James River Presbytery
TE Larry Hoop	Ohio Valley Presbytery
TE Ryan Hudson	Nashville Presbytery
TE William Keyton	Central Carolina Presbytery
TE Jacob Morrison	Piedmont Triad Presbytery
RE Eric Nederlof	Canada West Presbytery
TE Jared Nelson	Presbytery of the Ascension
TE Erik Oldfather	Chicago Metro Presbytery
TE Nate Osner	Central Indiana Presbytery
TE Thomas Powell	Northern New England Presbytery
TE Jason Schubert	Tidewater Presbytery
TE David Stewart	Suncoast Florida Presbytery

REVIEW OF PRESBYTERY RECORDS

MINORITY REPORT
on Recommendation X.58: Pacific Presbytery

The undersigned respectfully disagree with the recommendation of the Committee on Review of Presbytery Records (CRPR) regarding Pacific Presbytery, 2026-04 (p. 1560).

CRPR recommends that the General Assembly find that Pacific Presbytery erred in not judging a stated difference with the Westminster Standards to be hostile to the system of doctrine.

Motion of the Minority Report

We recommend that the General Assembly strike X.58.c.2026-04 (p. 1560) in its entirety.

The Stated Difference

The stated difference concerns whether artistic or didactic images of Jesus may be made, provided they are not used in worship or for veneration. The candidate stated:

> *"I believe it's acceptable to have artistic or didactic images of Jesus, so long as they're not used in worship or for veneration. Since Jesus is the visible image of the invisible God (Col. 1:15), I don't believe all depictions violate the second commandment when used appropriately."*

The question before the Assembly is not, in the first instance, whether images of Christ should be made. Many of us personally agree with the *Westminster Standards*' teaching and believe that depictions of Christ should be avoided. Nor should this debate be reduced to a general discussion of whether it is right, wise, helpful, or pastorally appropriate to depict the incarnate Son of God.

The question before us is narrower and more constitutional: Can a man subscribe in good faith to the *Westminster Standards*, and serve as a Reformed and Presbyterian minister, while believing that the second commandment does not forbid all artistic or didactic depictions of the humanity of Christ, provided such images are not used in worship or for veneration?

We believe the answer is yes.

Rationale for Minority Report

The PCA's rule of subscription does not require agreement with every proposition or statement in the *Westminster Standards*. Rather, the relevant constitutional question is whether the stated difference is hostile to the system of doctrine or strikes at the vitals of religion (*RAO* 16-3.6.c–d; *BCO* 21-4.e–g). Those phrases should not be treated as mere intensifiers. They have real meaning.

A difference that strikes at the vitals of religion is one that brings into question a man's Christian profession or his adherence to the essentials of the Christian faith: the triune God,

the deity of Christ, the substitutionary atonement, the resurrection, justification by faith, or other truths fundamental to Christianity itself. A difference that is hostile to the system is one that undermines the Reformed system of doctrine as such. Here, the question is whether this difference is hostile to that system.

The question, then, is not whether the *Westminster Standards* teach against images of Christ. They do. The question is whether a man who differs at this point is therefore outside the bounds of good-faith subscription, or unfit to serve as a Presbyterian minister.

That is a much stronger claim, and we do not believe it has been established.

For many years, Presbyteries in our denomination have routinely approved this kind of difference. They have recognized that a man may disagree with the *Westminster Standards* at this point while sincerely subscribing to the system of doctrine contained therein. This has not been treated as a denial of the Reformed faith, nor as a defect that calls a man's Christian profession into question. The Committee's recommendation would effectively overturn that broad and long-standing practice.

There are also good theological reasons to regard this difference as not hostile to the system. The divine nature of Christ is invisible and cannot be pictured. But the incarnate Son truly assumed a human nature, including a true human body. The question of whether that his humanity may be depicted, while never picturing or representing the divine nature and never using such an image in worship or veneration, is therefore more difficult than the question of whether God as God may be imaged. One may believe the *Westminster Standards* are correct and still recognize that this is not the same as denying the second commandment itself or conflating it with the first, which could be a systemic issue that would call for closer scrutiny.

Further, many faithful Reformed Christians, elders, and ministers, including many in the PCA, have held that images depicting the humanity of Christ may be used for teaching, art, or historical representation, while still rejecting idolatry, veneration, and the use of images in worship. To say that this view strikes at the vitals of religion would imply that such men's Christian profession is called into question. To say that it is hostile to the system would imply that such men cannot be genuinely Reformed. We do not believe either conclusion is warranted.

This can be made concrete. R.C. Sproul registered virtually the same difference on the issue of images of Christ. "That 'visible representation' (*WCF* 21.1) refers to visible representations of God the Father" (*Truths We Confess*, vol. 2, p. 312). In the lecture series, *Recovering the Beauty of the Arts* (https://learn.ligonier.org/daily-video/2026/04/15/images), Sproul states:

> When we're painting images of Jesus, we're recalling the human Jesus just as we do the apostles. That's part of nature, and we're not trying to capture the divine nature in those representations. Jesus didn't say before he left to his disciples now I want you to blot out of your memory any recollection of what I look like. Because obviously they couldn't block that out of their recollection, and there was nothing wrong with Jesus

> manifesting himself with the likeness of human flesh. I don't see anything that would prohibit that from being reproduced, artistic creativity, in the life of the church. But obviously any use of art in church runs the risk of degenerating into idolatry. But I also think that the cure for abuse is not disuse. Historically we have God adorning his presence with the beautiful, and I think that he has placed a pattern there, a principle there, that remains forever.

Historically other Reformed theologians as prominent as Herman Bavinck have wrestled with the application of the Second Commandment to art writing:

> Portraying Christ on stage, as is done, for example, in the Passion play in Oberammergau, is absolutely impermissible. No one can express or portray him, even approximately, and by an artificial "artistic illusion" elicit from us an impression of Christ's "perfect holiness." It is something different whether a painter or sculptor may make any image of him. I would not dare to prohibit these, since "the painter and sculptor make no claim to show us the whole living present Christ, but only a single aspect of His being, and aim by their works of art only at reviving the historical remembrance of Christ." Such efforts portray only a specific aspect, such as his meekness, or his frame of mind in a specific moment as portrayed in Scripture, such as in the garden of Gethsemane (Herman Bavinck. *Reformed Ethics*. Volume 2. Pg 166).

One may disagree with that conclusion. But would we really want to say that there is no place for R.C. Sproul, Herman Bavinck, or others like them as a PCA minister? Is this common disagreement among solid Reformed men like R.C. Sproul and Herman Bavinck, something that is no longer allowable?

That is the practical implication of the Committee's recommendation. It is not merely saying, "The *Westminster Standards* are correct." It is saying that a man who believes artistic or didactic images of Christ's humanity may be made, so long as they are not used in worship or for veneration, holds a difference that is hostile to the system of doctrine, cannot subscribe to the *Westminster Standards* in good faith, and so should not be ordained in the PCA.

We believe that conclusion is too strong.

Therefore, while we affirm the *Westminster Standards* and respect the conviction that images of Christ should not be made, we do not believe this stated difference is hostile to the system of doctrine or strikes at the vitals of religion. Pacific Presbytery was within its constitutional discretion to approve the exception.

For these reasons, we urge the Assembly to vote against the Committee's recommendation and in favor of the minority report to strike the exception X.58.c.2026-04 (p. 1548–49).

Minority Report Signers

TE Wes White Northern Illinois

1	TE Robbie Crouse	South Florida
2	TE Nate Osner	Central Indiana
3	TE Jason Schubert	Tidewater
4	TE Martin Cates	James River
5	RE Randy Berg	Pacific
6	TE Erik Oldfather	Chicago Metro
7	TE Lindsey Williams	Eastern Carolina
8	TE Larry Hoop	Ohio Valley
9	TE Sherman Wong	Eastern Canada
10	TE Jacob Morrison	Piedmont Triad
11	TE Jim Fredere	Metropolitan New York