

SUPREME COURT OF THE STATE
OF WASHINGTON

THE PRESBYTERY OF SEATTLE, a Washington nonprofit corporation; THE FIRST PRESBYTERIAN CHURCH OF SEATTLE, a Washington nonprofit corporation; ROBERT WALLACE, President of the First Presbyterian Church of Seattle, a Washington nonprofit corporation; WILLIAM LONGBRAKE, on behalf of himself and similarly situated members of First Presbyterian Church of Seattle,

Respondents,

v.

JEFF SCHULZ and ELLEN SCHULZ, as individuals and as the marital community composed thereof; and LIZ CEDERGREEN, DAVID MARTIN, LINDSEY MCDOWELL, GEORGE NORRIS, NATHAN ORONA, and KATHRYN OSTROM, as trustees of the First Presbyterian Church of Seattle, a Washington nonprofit corporation,

Petitioners.

DECLARATION OF
HEIDI HUSTED ARMSTRONG
IN OPPOSITION TO
PETITIONERS' EMERGENCY
MOTION FOR STAY

I, Heidi Husted Armstrong, pursuant to RCW 9A.72.085, declare as follows:

1. I am over the age of eighteen, have personal knowledge of the matters set forth in this declaration, and am competent to testify about

them. I submit this declaration in opposition to petitioners' emergency motion for stay.

2. I have previously submitted three declarations in this matter, all of which are included in Plaintiffs' Appendix ("PA"). The first was the Declaration of Heidi Husted Armstrong in Support of Plaintiffs' Motion for Summary Judgment (PA 23-25), filed on March 10, 2016. In that declaration I described my professional background as an ordained Minister of Word and Sacrament and a teaching elder in the Presbyterian Church (U.S.A.), as well as my participation in the work of the Administrative Commission for First Presbyterian Church of Seattle.

3. On February 16, 2016, the Administrative Commission assumed original jurisdiction with full power of the Session of First Presbyterian Church of Seattle ("FPCS"). This removed the former ruling elders from any role in church government. They were also relieved of any responsibility for the management of church property, except as directed by the Administrative Commission acting as Session. In addition, the Administrative Commission, acting as the Session, undertook its duty under G-3.0201 of the Constitution of the Presbyterian Church (U.S.A.) to (a) provide that the Word of God may be truly preached and heard, (b) provide that the Sacraments may be rightly administered and received, and (c) nurture the covenant community of disciples of Christ.

4. Also on February 16, 2016, I was appointed by the Session as Temporary Pastor of FPCS. I have served as a Presbyterian pastor for over 30 years, specializing in transitional ministry, specifically helping churches deal with congregational conflict and leaders' misuse of power.

5. The Administrative Commission's decision to appoint me as temporary pastor was based upon its finding that the former co-pastors of FPCS had renounced the jurisdiction of the church in December 2015, leaving the congregation without a pastor. The Administrative Commission also determined that the conduct of the former co-pastors and the former ruling elders had caused a schism within the congregation and that the true church consisted of those who opposed the actions of the former co-pastors and the former ruling elders.

6. I have been conducting worship services for the true church every Sunday since February 22, 2016. I have provided for the sacrament of Holy Communion and have offered ongoing pastoral care and counseling to congregational members and the larger community throughout the week. Attendance at the weekly services has typically ranged from 12 to 25 worshipers.

7. The former co-pastors and former ruling elders have refused to recognize the jurisdiction of Seattle Presbytery or the findings and decisions of the Administrative Commission.

8. David Martin states in paragraph 7 of his declaration that at no point has anyone from the Presbyterian Church (U.S.A.) or the Administrative Commission asked the former ruling elders or church staff to stop using the church or church property. Mr. Martin is wrong. The Administrative Commission asked the former church leadership to vacate the premises in paragraph 21 of the Administrative Commission's report.

9. Because the former co-pastors and former ruling elders have continued to pose as First Presbyterian Church and have refused to leave the premises, I have been required to conduct worship services at

other, less suitable locations (basement rooms in retirement facilities) as well as on Sunday afternoon, a less favorable time. Further, we have been notified that the facility we are currently using has been sold, and in the near future we will no longer be able to use it.

10. The lack of access to worship space poses a hardship to the true church. But as important as worship is, church is more--much more--than Sunday worship. The petitioners' continued occupation of church physical facilities denies the true church access not only to worship space but also to office, administrative, classroom and community space (including for counseling, pastoral care, fellowship opportunities, Bible study and faith formation classes, and other activities to build community and nurture spiritual growth). Vital ministry requires access to facilities and careful stewardship of congregational assets on an ongoing basis.

11. Other "spaces" that remain in the control of the former church include the FPCS website and membership list. While we have tried to cobble together what we can, the actions of the former leaders have severely impeded our ability to communicate directly and effectively with the congregation, resulting in much confusion and ill will among parishioners.

12. In addition to congregational activities, one of the important and longstanding outreach ministries of FPCS has been a Wednesday night dinner and shelter for homeless men on First Hill. I understand that the shelter has been closed, but it is our hope to reopen and reinvigorate that ministry. Seattle Presbytery is also committed to ecumenical ministry and other partnerships in Seattle. A fully functioning,

multi-faceted ministry on the FPCS property would be a substantial asset to grow and enhance those efforts.

13. David Martin states in paragraph 6 of his declaration that the “disaffiliation” and lawsuit have had no effect on church operations or the congregation. He is wrong.

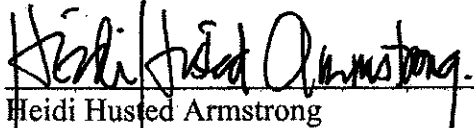
14. In refusing to abide the Presbytery’s discipline and by not allowing the true church access to the property that is rightfully theirs, the former ruling elders and former co-pastors continue to sow seeds of confusion and resentment, and they continue to jeopardize the long-term health of the congregation.

15. During the last ten years, under the leadership of the former co-pastors and the former ruling elders, the FPCS congregation has dwindled to far fewer than 100 members. Congregational members are no longer able to keep the church afloat with their financial gifts alone. The Administrative Commission determined that the leaders drove many people to leave the church. In particular, the steps leading up to the “disaffiliation” vote had severely deleterious effects on the life and health of FPCS.

16. Without full access to the property, the future ministry opportunities as envisioned by the Administrative Commission and the members of the true church are stymied. Without full access to the property, the ministries of FPCS that have been part of Seattle Presbytery for more than a century will be harmed, perhaps irrevocably. For all these reasons, it is my prayer that the true church at FPCS will soon have unrestricted access to the property that has been its historic home.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 22 day of July, 2016, at Belfair, Washington.


Heidi Husted Armstrong