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HEARING PANEL- DIOCESE OF NEW JERSEY

EPISCOPAL CHURCH

Diocese of New Jersey,

*Complainant,*

v.

The Rev. Daniel E. Somers,

*Respondent.*

TITLE IV INVESTIGATION  
CANON IV. 12.1

Case Number 2021-1

Case Number 2021-3

Written Response to Notice Pursuant to Canon  
IV.13.2

Respondent The Reverend Daniel E. Somers (“Rev. Somers”) hereby responds to the Notice Pursuant to Canon IV.13.2 and Amended Written Statement as follows:

**PRELIMINARY STATEMENT**

Rev. Somers is a newly ordained Priest, ordained in June of 2019. Soon thereafter, in October 2019, Rev Somers became Priest-in-Charge of the St. Andrews Parish. Rev. Somers was and is invested in the Parish and in his Parishioners and has been devastated by the allegations against him. Rev. Somers did not violate any Canon and he therefore pleads not guilty and requests a hearing on all allegations against him.

Rev. Somers respectfully objects to the Notice provided to him as the notice failed to include the required language that Rev. Somers’ written response is due “within 30 days of the

mailing date of the Notice” in violation of Title IV.13 and failed to describe the hearing panel proceedings in violation of Title IV.13. Rev. Somers additionally respectfully objects to the service of the Notice as it was not served upon his counsel in a timely manner.

### **WRITTEN RESPONSE**

#### **I. Offenses Related to Complainant Julia Barringer**

- a. **Count 1:** Rev. Somers denies that his alleged actions violated any Canon. By way of further response, Rev. Somers was not hired as an attorney for the Parish and therefore was not required to have or maintain malpractice insurance.
- b. **Count 2:** Rev. Somers denies that his alleged actions violated any Canon. By way of further response, Rev. Somers was not hired as an attorney for the Parish and therefore was not required to have or maintain malpractice insurance.
- c. **Count 3:** Rev. Somers denies that his alleged actions violated any Canon.
- d. **Count 4:** Rev. Somers denies that his alleged actions violated any Canon.
- e. **Count 5:** Rev. Somers denies that his alleged actions violated any Canon.
- f. **Count 6:** Rev. Somers denies that his alleged actions violated any Canon.
- g. **Count 7:** Rev. Somers denies that his alleged actions violated any Canon.

#### **II. Offenses Related to Complainant Mark Stewart**

- a. **Count 1:** Rev. Somers denies that his alleged actions violated any Canon.

#### **III. Offenses Related to Complainant Rt. Rev. William Stokes, Bishop Diocesan of New Jersey**

- a. **Count 1:** Rev. Somers denies that his alleged actions violated any Canon. By way of further response, when Rev. Somers was offered his position and his contract, it was known by all that during the time of his contract he would reach the age of 72.

However, the contract was drafted such that it extended beyond Rev. Somers' 72<sup>nd</sup> birthday.

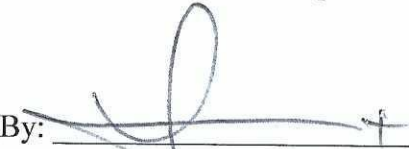
- b. Count 2:** Rev. Somers denies that his alleged actions violated any Canon. By way of further response, the law suit does not challenge the Bishop's ecclesiastical authority.

Rev. Somers is deeply saddened by this matter and wishes to continue as a Priest. Rev. Somers respectfully requests a hearing on these matters.

**BRACH EICHLER L.L.C.**  
*Attorneys for Complainant Rev. Somers*

Dated: September 28, 2022

By: *Riza I Dagli*  
Riza I. Dagli, Esq.

By:   
Reverend Daniel E. Somers