

**ALL PARTIES AGREE THAT:**

Issue	Support
<p>1. the only issue is <b>equitable title</b> (the Corporation has legal title)</p>	<p><i>Cross-Pets. combined Reply at 14, 24:</i> “this case turns on who holds equitable title ... the Corporation holds legal title”</p>
<p>2. equitable title is settled by the <b>trust in the Diocese charters</b></p> <p>.....</p> <ul style="list-style-type: none"> <li>• this trust <b>replaces conflicting deeds</b></li> </ul>	<p><i>Cross-Pets. combined Br. at 16, 18:</i> “The court of appeals erred by rejecting the Diocesan Trust ... the parties have agreed that the Diocesan Trust is valid and enforceable under neutral principles of law.</p> <p><i>Cross-Pets. combined Reply at 3 n.6:</i> “The text of the Diocesan Trust establishes the trust.”</p> <p>.....</p> <p><i>LTEC Resp. Br. at 8:</i> “the Diocesan Trust is the relevant instrument of ownership.”</p> <p><i>LTEC Resp. Br. at 31:</i> “Nor do the parties dispute that the trust set forth in the deed to [All Saints] was subsequently modified by the parties such that it was superseded by the Diocesan Trust.”</p>
<p>3. the trust beneficiaries are congregations <b>in union with the Diocese’s Convention</b></p>	<p><i>LTEC Resp. Br. at 6:</i> “the trust beneficiaries are the local Parishes and Missions, which are unincorporated associations in union with the Convention of the Diocese.”</p>

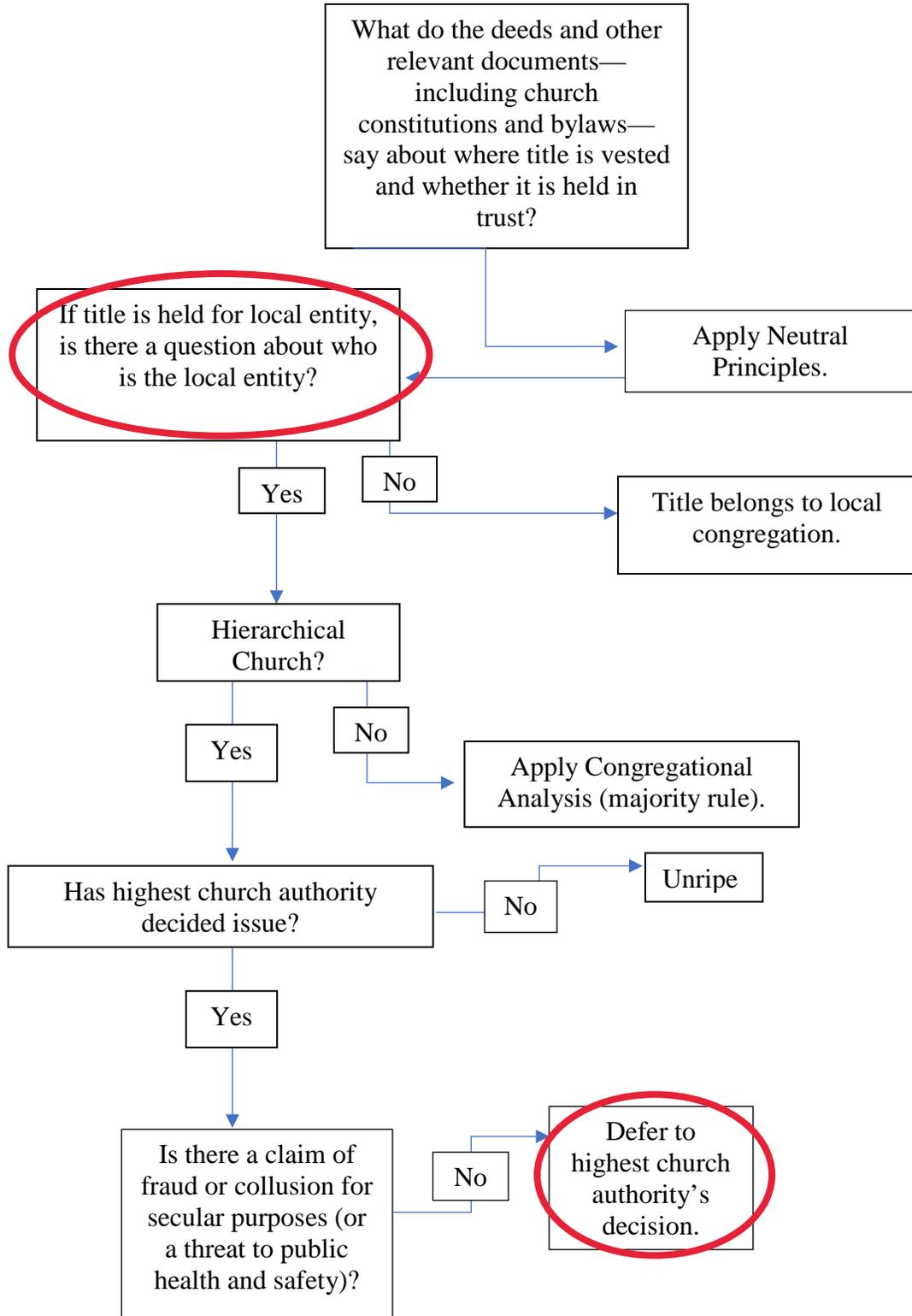
**THE ONLY ISSUE LEFT IS: WHICH CONVENTION MATTERS?**

*EDFW Reply Br. at 4:* “the only issue on equitable title is which side represents the beneficiaries: the Diocese and the congregations in union with its Convention.”

*Cross-Pets. combined Reply at 14:* “Plaintiff Congregations thus are in union with Plaintiffs’ Convention, and Defendant Congregations are in union with Defendants’ Convention. The critical question is which Convention matters”

*Cross-Pets. combined Br. at 22:* “The only question left, to enforce that trust under neutral principles, is which parties are entitled to control the Diocese and Congregations”

**The Wrong Approach: the court of appeals simply deferred to TEC to decide who represents a Texas legal entity (547 S.W.3d at 409)**



141-252083-11

**The Neutral Principles Approach: Texas courts decide  
who represents a legal entity from its governing documents**

**THE CONSTITUTION AND CANONS  
OF  
THE EPISCOPAL DIOCESE OF FORT WORTH**

*Prepared by*

**THE COMMITTEE  
ON  
CONSTITUTION AND CANONS  
THE EPISCOPAL DIOCESE OF FORT WORTH**

Revised by the 26<sup>th</sup> Annual Convention of  
The Episcopal Diocese of Fort Worth  
November 2008

141-252083-11

**ARTICLE 8****RULES OF CONVENTION**

At every meeting of the Convention, the Clergy and Laity shall deliberate as one body. Each priest present and each Lay Delegate present shall be entitled to one (1) vote. Unless a vote by orders is determined, required or otherwise provided by the Constitution or Canons, a majority of the aggregate votes shall be decisive. Whenever a vote by orders is determined, required or otherwise provided, a concurrent majority in both orders shall be necessary. Upon demand of any seven (7) members of the Convention representing not less than three (3) Parishes or Missions of the Diocese, the vote shall be taken by orders.

The Convention may adopt rules of procedure to regulate and expedite the orderly disposition of its business, including elections other than those governed by Article 16 of this Constitution.

Revised October 1989

141-252083-11

**ARTICLE 17****ELECTION OF BISHOPS AND CALLING OF AN  
ASSISTANT BISHOP**

The election of a Bishop, a Bishop Coadjutor, or a Suffragan Bishop for this Diocese shall take place at the regular meeting of the Convention or at a special meeting of the Convention called for that purpose. A concurrent majority of the two orders shall be necessary to a choice if two-thirds (2/3) of all the Clergy entitled to vote and Lay Delegates from two-thirds (2/3) of the Parishes and Missions entitled to representation are present and voting; otherwise, two-thirds (2/3) of the votes in each order present shall be necessary to a choice. In any event, the election may not occur unless a quorum be and remain present.

The Bishop may call an Assistant Bishop in accordance with the Constitution and Canons of the Episcopal Church.

Revised October 1989

141-252083-11

**ARTICLE 10****THE STANDING COMMITTEE**

The Standing Committee shall consist of three (3) Priests entitled to seats in the Diocesan Convention and three (3) Lay Persons who shall be Confirmed Communicants in good standing in this Diocese at least eighteen (18) years of age and who shall possess such other qualifications as may be prescribed by Canon.

When there is a Bishop in charge of the Diocese, The Standing Committee shall be his Council of Advice. If there be no Bishop canonically authorized to act, The Standing Committee shall be the Ecclesiastical Authority of the Diocese.

The Members of The Standing Committee shall be elected by ballot by a concurrent majority of each order at an Annual Convention. Their terms of office shall be for three (3) years or until their successors are elected. At each Annual Convention one (1) Priest and one (1) Lay Member of The Standing Committee shall be elected.

Vacancies occurring prior to the expiration of the term of any member of this Committee shall be filled by the vote of a majority of the remaining members of The Standing Committee. The person so elected shall fill out the unexpired term, constituting a first term of office if said unexpired term is for two or more years.

No member of The Standing Committee may serve more than two (2) consecutive terms.

The Standing Committee shall keep a record of all its official acts and shall report them to the Convention.

Revised November 1997

**ARTICLE 4**

**SPECIAL MEETINGS OF CONVENTION**

The Bishop, or a majority of all members of the Standing Committee, may call a special meeting of the Convention upon thirty (30) days notice thereof.

When there is no Bishop, the Standing Committee shall have power to call a special meeting of the Convention, giving thirty (30) days notice thereof.

At any special meeting of the Convention, the only business to be transacted shall be specified in the call.

141-252083-11

**ARTICLE 18****CANONS**

Canons consistent with this Constitution may be adopted, altered, amended, or repealed at any Annual Convention of the Episcopal Diocese of Fort Worth by a majority vote of the Convention, provided that no new Canon and no alteration, amendment, or repeal of an existing Canon shall be adopted unless the same shall have been filed in writing with the Secretary of the Convention not less than sixty (60) days before the meeting of the Convention. The Secretary shall, not less than forty-five (45) days before the meeting of the Convention, deliver copies of all proposed amendments or alterations to the Canons to the Chairman of the Committee on Constitution and Canons. The Committee shall report thereon to the Convention on the first day of the meeting.

Where any amendment of a Canon has been so proposed and referred to the Committee, amendments thereto may be made from the floor of the Convention if within the judgment of the presiding officer of the Convention such amendments are germane to the pending amendment.

No other amendments or alterations to the Canons shall be considered at that meeting except by unanimous consent of the Convention.

Changes to the existing Canons shall take effect immediately upon the adjournment of Convention. Typographical errors may be corrected by the Committee on Constitution and Canons and reported to the Convention.

Revised November 2008

**ARTICLE 19****ALTERATIONS AND AMENDMENTS TO THE CONSTITUTION**

A proposal for an alteration or an amendment to the Constitution shall be presented in writing at an Annual Convention and shall be referred to and be reported upon by the Committee on Constitution and Canons consisting of at least two (2) members of the Clergy and two (2) Lay Persons. If the proposal, together with any amendments pertinent thereto, receive the **majority** vote of the Convention, it shall be printed in the Journal and shall lay over until the next Annual Convention. If approved by a concurrent **majority** of the vote of both orders at the next Annual Convention, the Constitution shall be altered or amended accordingly. Such alteration or amendment shall take effect thirty (30) days after the adjournment of the Convention. Typographical errors may be corrected by the Committee on Constitution and Canons and reported to the Convention.

Revised October 1991

**STANDING RULES OF PROCEDURE**  
**FOR**  
**THE ANNUAL CONVENTION**  
**OF**  
**THE DIOCESE OF FORT WORTH**

1. **PRESIDENT:** The Bishop shall be the Presiding Officer of the Convention. He may call to the chair any qualified person to relieve him temporarily. The Bishop shall have full power and authority to take such action (consistent with the Constitution and Canons of the Diocese) as he deems necessary to expedite the orderly disposition of the business of the Convention.
2. **PRAYER:** After the Convention is called to order by the presiding officer, an opening prayer shall be offered by the Bishop or someone designated by him.
3. **SECRETARY:** The first order of procedure shall be the nomination of a Secretary by the Bishop and election by the Convention. Assistant Secretaries may be appointed by the Bishop.
4. **QUORUM:** The Chairman of the Credentials Committee shall report the number of Clergy and Lay members in attendance and whether or not there is a quorum present. If there is a quorum, the President shall recommend an Order of Business to be adopted by the Convention. Then the Convention shall proceed to such business. In the absence of a quorum, the Convention shall transact no other business than to recess or stand adjourned from time to time until a quorum is present.
5. **ORDER OF BUSINESS:** If there is a quorum the Convention shall proceed to the business of the Convention pursuant to the Order of Business recommended by the President and adopted by the Convention. The Bishop shall have the authority, within his discretion, to deviate from such Order of Business adopted as the exigencies of the occasion may require.
6. **PARLIAMENTARIAN:** The Bishop shall appoint a Parliamentarian to advise him on parliamentary questions arising during the Convention.
7. **DEBATE:** A member having received recognition of the chair shall give *his* name and the church represented.
8. **TITLES:** Any person addressing the chair while the Convention is in session shall address the chair as "Right Reverend Sir" if the Bishop is in the chair. If some other person is in the chair, the address shall be "*Mr.* President".
9. **MICROPHONES:** A member making a motion or brief statement shall use the nearest microphone. A member making a report or speaking at length on any subject shall use the microphone at the lectern at the front of the meeting place.
10. **DISPATCH OF BUSINESS:** The Bishop, within a reasonable length of time before the convening of the Annual Convention, shall appoint, from among the members of the Convention, a Committee on the Dispatch of Business consisting of a Chairman and not more than four (4) other members. It shall be one of the duties of this Committee to prepare an Order of Business agreeable to the Bishop and to perform such other acts and duties as may be deemed necessary or advisable to dispatch the business of

the Convention. Such Committee shall always be entitled to the floor on business pertaining to that Committee. This Committee shall continue in office until a successor is appointed.

11. **RESOLUTIONS:** All resolutions shall be delivered to the Secretary of Convention at least sixty (60) days before Convention and processed prior to the meeting by the Resolutions Committee in adequate time to place written copies of the resolutions in the hands of the members not later than twenty (20) days before the opening day of Convention. Any resolution which shows on its face that it deals with matters arising after the deadline date shall be exempt from this requirement. All other resolutions delivered to the Secretary after the deadline shall be governed by Rule 27.

12. **SPECIAL ORDER:** Any item of business of the Convention may be set as a special order of business or taken up out of its regular order at any time by the concurring **majority** vote of the members of both orders.

13. **NOMINATING COMMITTEE:** The Bishop (or in the event of his failure to act, the Standing Committee) shall appoint, not less than sixty (60) days in advance of each Annual Convention, a Nominating Committee composed of four (4) clergymen and four (4) laymen, resident in the Diocese, which shall report to the Convention nominations for all elective offices (other than those for which the Bishop makes the nominations) in accordance with the following provisions:

- a. There shall be nominated not less than two (2) nominees for each office. Each nominee shall be verified as an adult communicant in good standing.
- b. There shall be obtained from each nominee presented his personal assurance of his willingness to serve and availability if elected.
- c. The name of each nominee shall be accompanied by suitable brief biographical data, including a listing of Parish, Mission and Diocesan offices then or previously held.
- d. Suggestions as to persons for consideration shall be received from Parishes, Missions, and Diocesan Institutions and from individuals.
- e. No member of the Nominating Committee shall be named a nominee by the Nominating Committee.
- f. Further nominations for any office may be made on the floor of Convention, at which time, biographical data of the nature above described must be submitted in writing.

14. **ELECTIONS:** All members of the Convention entitled to vote, both clergy and laity, shall cast their ballots at one voting for all elective offices. **The election of all officers shall be by a concurrent majority of both orders voting. Voting shall proceed by successive ballot(s) until the requisite number of offices have been filled by a concurrent majority of both orders of those voting.**

15. **APPOINTMENTS:** The Bishop shall have the authority to appoint all Board members, Trustees, Committee members, and fill other positions which are not required to be elected or otherwise selected by the Constitution or Canons of the Episcopal Church in the United States of America, the Constitution or Canons of the Diocese of Fort Worth or any other lawful authority.

16. **LIMITATIONS ON DEBATE:** To expedite the business of the Convention, debates on any pending resolution or motion shall be limited to five (5) minutes per speaker, alternating sides, and one (1) person shall not speak more than once on the pending matter until all other persons who so desire have

141-252083-11

CANON 17**CORPORATION OF THE EPISCOPAL  
DIOCESE OF FORT WORTH**

Sec. 17.1 Corporation of the Episcopal Diocese of Fort Worth is a non-profit and charitable organization organized under Texas laws, also known as the "Diocesan Corporation." In addition to its regular powers, it may receive, hold, manage and administer funds and properties acquired by gift or by will or otherwise for the use and benefit of the Diocese and any Diocesan Institutions.

Sec. 17.2 The management of its affairs shall be conducted and administered by a Board of Trustees of five (5) elected members, all of whom are either Lay Communicants in good standing of a Parish or Mission in the Diocese or members of the Clergy canonically resident in the Diocese, in addition to the Bishop of the Diocese, who shall serve as Chairman of the Board or may designate the President or other officer of the Corporation to serve as such. The Board of Trustees shall have the power and authority to conduct the affairs of said Corporation in accordance with its charter and by-laws and in accordance with the Constitution and Canons of the Diocese from time-to-time adopted.

Sec. 17.3 One member of the Board of Trustees shall be **elected at each Annual Convention** and each member shall serve a term of five (5) years. The terms of members shall be so arranged that the term of only one (1) member shall expire annually. The Board of Trustees shall fill any vacancy which occurs on the Board until the annual election. The Bishop shall nominate the members of the Board of Trustees.

Sec. 17.4 The Board of Trustees shall adopt its own by-laws and shall elect such officers as its by-laws may require.

Sec. 17.5 The Board of Trustees shall submit a report at each Annual Convention covering its operations for the preceding fiscal year and showing its financial condition. If and when required by the Standing Committee of the Diocese, the Board of Trustees shall make such additional reports and furnish such additional information as may be requested. The books and records of the Board of Trustees shall at all times be open for inspection and examination by the Standing Committee of the Diocese or its representatives.

Revised October 1989

141-252083-11

**ARTICLE 14****TITLE TO CHURCH PROPERTY**

The title to all real estate acquired for the use of the Church in this Diocese, including the real property of all Parishes and Missions, as well as Diocesan Institutions, shall be held subject to control of the Church in The Episcopal Diocese of Fort Worth acting by and through a corporation known as "Corporation of the Episcopal Diocese of Fort Worth." All such property as well as all property hereafter acquired for the use of the Church and the Diocese, including Parishes and Missions, shall be vested in Corporation of the Episcopal Diocese of Fort Worth.

Corporation of the Episcopal Diocese of Fort Worth shall hold real property acquired for the use of a particular Parish or Mission in trust for the use and benefit of such Parish or Mission. The income from such property shall belong to such Parish or Mission, which will be responsible for expenses attributable thereto. Such property may not be conveyed, leased or encumbered by Corporation of the Episcopal Diocese of Fort Worth without the consent of the Rector, Wardens and Vestry of such Parish or Mission. Upon dissolution of such Parish or Mission, property held in trust for it shall revert to said Corporation for the use and benefit of the Diocese, as such.

All other property belonging to the Diocese, as such, shall be held in the name of the Corporation known as "Corporation of the Episcopal Diocese of Fort Worth", and no conveyance or encumbrance of any kind shall be valid unless executed by such Corporation and as may otherwise be provided by the Canons of the Diocese.

Revised October 1989

141-252083-11

CANON 18

## TITLE TO PROPERTY

Sec. 18.1 The Title to all property now owned and hereafter acquired by the Diocesan Corporation for its use and benefit and for the use and benefit of Parishes, Missions and Diocesan Institutions shall be held in the name of said Corporation and may only be conveyed or encumbered with the approval of the Board of Trustees and in accordance with the Constitution and Canons of the Episcopal Diocese of Fort Worth. All of the assets and properties of the Corporation and accumulations thereof shall be held and administered to effectuate its purpose. In case of the liquidation, dissolution or winding up of the Corporation, whether voluntary or involuntary, or by operation of law, the property held by the Corporation in trust for the use of a particular Parish, Mission or Diocesan School shall be conveyed to the governing body of such Parish, Mission or School. In case of the liquidation, dissolution or winding up of the Corporation, whether voluntary or involuntary, or by operation of law, the other assets or properties of the Corporation shall be distributed in such manner as the Board of Trustees of the Corporation shall direct, provided, however, that any such distribution shall be such as is calculated to be exclusively to carry out the purposes for which the Corporation is formed or for one or more other exempt purposes within the meaning of the applicable provisions of the Internal Revenue Code of 1954, as amended, or any similar federal statute then in effect and rules and regulations pursuant thereto. "The liquidation, dissolution or winding up of the Corporation," within the meaning of this Canon and of the Constitution of the Diocese, shall refer to the actual cessation of operation of the Corporation and not to the merger or subdivision of the Corporation or the Diocese.

Sec. 18.2 Real property acquired by the Corporation for the use of a particular Parish, Mission or Diocesan School shall be held by the Corporation in trust for the use and benefit of such Parish, Mission or Diocesan School. It is immaterial whether said acquisition is by conveyance to the Corporation by a Parish, Mission or Diocesan School now holding title, by the Bishop now holding title as a corporate sole, by a declaratory judgment upon division from the Diocese of Dallas, or by subsequent conveyance to the Corporation, so long as such property was initially acquired by a Parish, Mission or Diocesan School by purchase, gift or devise to it, as a Parish, Mission or Diocesan School. Such Parish, Mission or Diocesan School shall be entitled to all income from property held for it in trust by the Corporation and will be responsible for the direct expenses attributable to such property, but not for any administrative expenses of the Corporation. Property held in trust by the Corporation for a particular Parish, Mission or Diocesan School may not be conveyed, leased or encumbered in any way by the Corporation without the written consent of the Rector, Wardens and Vestry of the Parish, of the Standing Committee in the case of a Mission, or of the Board of Trustees of the Diocesan School for which such property is held in trust. Upon dissolution of a Parish, Mission or Diocesan School, such property held in trust for it shall revert to the Corporation for the use and benefit of the Diocese. "Dissolution" of a Parish, Mission or Diocesan School, within the meaning of this Canon and of the Constitution of the Diocese, shall refer to the actual cessation of operation of a Parish, Mission or Diocesan School and not to its merger, reorganization, change of location or attachment to a different Diocese.

Sec. 18.3 Real property held or acquired by a Parish, Mission or Diocesan School by purchase, gift or devise shall be conveyed by it to the Corporation if an ad valorem tax exemption based on religious or educational use is claimed. Real property held or acquired by a Parish, Mission or Diocesan School need not be conveyed by it to the Corporation if such property is held for investment or income-producing purposes and no ad valorem tax exemption is claimed.

Sec. 18.4 Property held by the Corporation for the use of a Parish, Mission or Diocesan School belongs beneficially to such Parish, Mission or Diocesan School only. No adverse claim to such beneficial interest by the Corporation, by the Diocese, or by The Episcopal Church of the United States of America

**Canon 18 (cont.)**

is acknowledged, but rather is expressly denied. All other property of the Corporation held for the Episcopal Diocese of Fort Worth for those exempt religious purposes within the meaning of the Internal Revenue Code, as herein above described. Such exempt religious purposes shall be those determined by the Convention of the Episcopal Diocese of Fort Worth and the appropriate officers elected by it. No adverse claim to such beneficial interest by The Episcopal Church of the United States of America is acknowledged, but rather is expressly denied.

Sec. 18.5 If it becomes necessary to sell or lease the property or otherwise dispose of it, the Corporation known as "Corporation of the Episcopal Diocese of Fort Worth" with the advice and consent of the Standing Committee is hereby authorized to execute such legal instruments as may be necessary to convey, lease or effect such other disposition as is herein authorized.

Revised October 1989

CANON 31  
CORPORATIONS

Sec. 31.1 Any Parish, Mission or Diocesan Institution which desires to organize a corporation to use in connection with the administration of its affairs may do so upon compliance with the following requirements.

- a. If organized by a Parish or Mission, any such corporation shall be merely an adjunct or instrumentality of such Parish or Mission; **the Parish or Mission itself, being the body in union with Convention, shall not be incorporated.**
- b. The articles of incorporation must expressly provide that such corporation is subject to, and its powers and rights shall be exercised in accordance with, the Constitution and Canons of this Diocese.
- c. Such corporation shall not hold title to real estate acquired for the use of the Church in the Diocese, which title must be vested and dealt with in accordance with the provisions of Article 13 of the Constitution of the Diocese.
- d. The proposed articles of incorporation and bylaws of such corporation, and any amendments thereof, shall, prior to filing or adoption, be submitted to the Chancellor of the Diocese for his approval as being in conformity with these provisions.

Sec. 31.2 Those in charge of the affairs of any corporation, organized by any Parish, Mission or Diocesan Institution, shall review its articles of incorporation and bylaws and bring them into conformity with provisions of this Canon, if inconsistent therewith.

Revised November 2008

141-252083-11

**ARTICLE 2****MEMBERS OF CONVENTION**

The Diocese of Fort Worth entrusts its legislation to a Convention to consist as follows: First, of the Bishop, when there be one; of the Bishop Coadjutor, when there be one; of the Suffragan Bishops, Assistant Bishops, if there be any; Second, of all priests canonically resident in the Diocese, and not under Ecclesiastical discipline, and who have not in contemplation of removal from this Diocese, applied for their Letters Dimissory; and Third, of Lay Delegates chosen by and representing their Congregations. Lay Delegates and their Alternates shall be elected by the Congregations of their respective Parishes and Missions at the Annual Parish Meeting and shall hold office until their successors are elected. The Rectors of Parishes and Vicars of Missions shall have authority to fill such vacancies as may occur from the list of Alternate Lay Delegates between the time of such election and any meetings of the Convention. Lay Delegates shall be confirmed communicants in good standing, at least 18 years of age.

Every Parish and Mission in union with the Convention shall be entitled to Lay Delegates determined by the number of confirmed communicants reported in the Annual Parochial Report for the year ending December 31 next preceding the Diocesan Convention, as provided by Canon.

Revised November 1995

**ARTICLE 3****THE ANNUAL MEETINGS OF CONVENTION**

The Convention of this Diocese shall assemble in the month of November at a place, time, and date set by the Bishop and Executive Council.

All meetings of the Convention of this Diocese shall be held in Fort Worth, Texas; provided, however, that an Annual Convention shall have the authority, if it so chooses, to designate the place of the next meeting of the Convention; and for sufficient cause the Bishop, with the consent of the Standing Committee, may change the date of meeting or appoint some other place for holding the Convention; provided that thirty (30) days notice of such change shall be given to each Parish and Mission in union with the Convention.

Revised November 1995

141-252083-11

**ARTICLE 5**

**QUORUM**

At any meeting of the Convention of this Diocese a quorum necessary to transact business shall consist of one-third (1/3) of the Clergy entitled to seats therein and Lay Delegates from one-third (1/3) of the Parishes and Missions in union with the Convention; but a smaller number shall have the power to adjourn from day to day until a quorum is obtained.

Revised October 1989

ARTICLE 9

**CONGREGATIONS IN UNION WITH CONVENTION**

Every Parish and Mission which shall have been created or admitted in accordance with the Constitution and Canons of this Diocese, shall be deemed to be in union with and entitled to representation in the Convention of the Diocese, unless deprived of such right either through suspension or dissolution.

If a Parish or Mission shall fail to pay its assessment as levied by the Convention, it shall be suspended from the right of representation in the Convention, unless such right be granted by a concurrent majority vote of both orders.

With the consent of the Bishop, any Parish or Mission which shall fail to conform with requirements prescribed by Canon or special resolution may be wholly dissolved by a concurrent two-thirds (2/3) vote of both orders. Such action can be taken only at an Annual Convention.

Revised October 1989

Non-ecclesiastical Issues	Ecclesiastical Issues
<p>“courts decide non-ecclesiastical issues such as property ownership based on the same neutral principles of law applicable to other entities ...” (@596)</p>	<p>“... while deferring to religious entities’ decisions on ecclesiastical and church polity questions.” (@596)</p>
<p>“But [in <i>Brown v. Clark</i> the Court] did not simply defer to the ecclesiastical authorities with regard to the property dispute” (@605)</p>	<p>“[I]n <i>Brown</i> the Court determined it lacked jurisdiction over the ecclesiastical questions of whether the doctrines of the two general churches were dissimilar and whether their merger was proper.” (@605)</p>
<p>“issues such as land titles, trusts, and corporate formation, governance, and dissolution, even when religious entities are involved” (@606)</p>	<p>“matters concerning theological controversy, church discipline, ecclesiastical government, or the conformity of the members of a church to the standard of morals required of them” (@601)</p>
<p>“But what happens to the property is not [an ecclesiastical matter], unless the congregation’s affairs have been ordered so that ecclesiastical decisions effectively determine the property issue.” (@607)</p>	<p>“what happens to the relationship between a local congregation that is part of a hierarchical religious organization and the higher organization when members of the local congregation vote to disassociate” (@607)</p>
<p>“whether and how a corporation’s directors or those entitled to control its affairs can change its articles of incorporation and bylaws” (@609)</p>	<p>“which worshipers are loyal to the Diocese and TEC, whether those worshipers constituted a parish, and whether a parish properly established a vestry” (@608)</p>
<p>“whether the vote by the parish members to amend the bylaws and articles of incorporation was valid under Texas law” (@610)</p>	<p>“which faction of believers was recognized by and was the ‘true’ church loyal to the Diocese and TEC” (@610)</p>