

July 15, 2023

Dear Park Street Church Elders,

It is with a heavy heart that I write this letter to inform you of serious concerns I have regarding Mark's spiritual leadership due to patterns at variance with the biblical qualifications of elder. I no longer have confidence that he ministers as one who is above reproach (as described in 1 Timothy 3 and Titus 1). Mark and I have worked together for three-and-half years, and I have spoken to him on multiple occasions about these concerns with the hope of either garnering (a) recognition and correction of my own misperceptions of his actions and/or (b) Mark's recognition of hurtful patterns and willingness to change and grow as a leader. Of course, there is no perfect spiritual leader. We are all on the journey of sanctification. I am well aware that I have serious flaws, and I deeply desire to spiritually master them, both for my own salvation and for the sake of those we are called to serve (1 Timothy 4:16). I am by no means expecting perfection from Mark or myself.

Over time, it became clear that despite my many attempts to clearly articulate issues I see in Mark's leadership (as outlined below), Mark is not willing to recognize these issues. Furthermore my raising of these issues only resulted in a growing schism in our working relationship, something deeply grieving.

Mark's patterns have only continued and deepened over time, resulting in the development of a toxic culture within the staff of Park Street Church and multiple hurt persons within our congregation. As you can imagine, Tracy and I have many times considered leaving the church, but as we laid this before the Lord, we never felt the freedom to leave. And so we have stayed out of obedience. I want to reiterate here that for us the easy (and unloving) action would be to remain silent and to slip away quietly. Furthermore, I realize my acting as a 'whistleblower' puts my own career as a pastor and reputation in peril given the not insignificant chance that my observations will be discounted, distorted, or used against me. But despite that risk, Tracy and I have felt that the Lord calls us to speak truth out of deep love for this church, its people, and its leadership, including Mark. As Proverbs 27:6 tells us, "Faithful are the wounds of a friend; profuse are the kisses of an enemy." I hope you each know that these words come out of deep love and commitment to this church, including love and commitment to my brother Mark, who I have, with God's grace and strength, chosen to forgive for the actions I outline below. Finally, I state all of these issues with a heart desiring to see Mark's sanctification and ultimate restoration.

I do also want to take a moment to indicate that I have again considered resigning as we have started this process, particularly in light of the potential suspicion that my actions come from a desire on my part for Mark's position. As many of you know, I never applied for the position of senior minister. I hope my willingness to resign underscores my motivation. That said, I also recognize that the church is in a fragile place, and my resigning would add stress and difficulty to our church at an already challenging time. Furthermore, and more importantly, the Lord has not given me and Tracy that freedom. If as the elder board you discern that the path of my resigning would be the best approach, I'm open to receiving and prayerfully considering that

recommendation. Finally, when Mark was called as our senior pastor, I made a commitment before the Lord to serve him, and I can state in good conscience before the Lord that I have served him and our church faithfully. Conflict arose in our relationship as I was honest with Mark about the issues outlined below. My honesty came out of a motivation to bless and protect our church by helping Mark improve in his leadership, though to my dismay these efforts only resulted in greater friction in our working relationship.

Mark shows patterns of behavior revealing a heart that is not conforming to the role of pastor. Consequently, this has led to hurt, harm, and scattering of our flock (Ezekiel 34:1-6). The current term for this is “spiritual abuse”, but the Scripture calls it ruling the flock “with force and harshness” (Ezekiel 34:4) and spiritual “domination” (1 Peter 5:3). While Mark rightly preached on this very text (1 Peter 5), expositing the text properly, his actions do not match his words. In fact, a general theme of the issues outlined below is the frequent *inconsistency* between Mark’s words and actions. As we know, actions speak louder than words. Relatedly, Scripture tells us in Titus 1:16, it is possible to “profess to know God, but deny him by [our] actions.”

While I believe I have tried to give Mark the benefit of the doubt in many situations throughout our working relationship, the last ten months have exhausted my ability to continue to give the benefit of the doubt. Some lay leaders in our church have tried to assure me that this is about management style: “With more time and coursework, Mark will manage the staff and flock with greater levels of compassion and relational skill.” I see this as an incorrect diagnosis. The fundamental problem is not managerial acumen (though I’m sure these are helpful skills) but rather moral character and virtue. Furthermore, given Mark’s unwillingness to recognize or have remorse over these issues, these patterns of moral weaknesses in character are not “progressing” for the better (1 Timothy 4:15), but rather multiplying, despite more and more people asking him to examine himself and these issues.

I categorize those patterns under the following four attributes among the necessary qualifications for church leadership (see addendum for additional commentary on these qualifications).

1. ***Not violent* (πλήκτης, 1 Timothy 3:3):** “violent” refers to one who acts like a bully, bruiser, aggressor, forceful, fostering fear.
2. ***Gentle not quarrelsome* (ἐπιεικής, ἄμαχος, 1 Timothy 3:3):** “Gentle” is one who forgives much, yielding, does not insist, forbearing with others, magnanimous in spirit, kind; “Quarrelsome” refers to one who creates fights, does not seek the peaceable way, inconsiderate of others feelings, willingness to repress others.
3. ***Double-tongued* (δίλογος, 1 Timothy 3:8):** meaning insincere speech, deceitful, duplicitous, dissembling, saying one thing and meaning another, making different representations to different people about the same thing, double talk.
4. ***Not arrogant* (αὐθάδης, Titus 1:7):** meaning self-willed, stubborn, headstrong, fails to respect the rights of those who are served

1. Not violent (πλήκτης, 1 Timothy 3:3): “violent” refers to one who acts like a bully, bruiser, aggressor, forceful, fostering fear.

As pastors we must be gentle to the flock and to one another. Gregory the Great is known to have said, “No one does more harm in the church than he who has the title or rank of holiness and acts violently.” A pastor-elder must not use his or her spiritual rank or authority to push people around, create fear, or act unkindly. Mark’s tone of voice is almost always mild, but his actions, and even sometimes his words, not infrequently lack gentleness, and have been abusive toward me, the staff, and even some congregants.

1.1 Violation of Pastoral Ethics

There are at least nine different people in our church regarding whom Mark, in multiple attempts, demanded and pushed that I give him information that I received within protected spiritual care conversations. This problem became so grievous to my soul, that on April 27, 2022, I sent a Teams message to the entire pastoral staff (full- and part-time) reminding everyone of our ethical and legal obligations to protect pastoral confidentiality. I wrote this message to everyone specifically because of my alarm in Mark’s aggression toward me (and my awareness that it was taking place with other pastors). This confidentiality includes the sharing of confidential information between pastors, which may not be done without the congregants’ consent (noting the exception that clergy must report child abuse). Here is the note from that date:

I read this [quote] today as a reminder about the importance of pastoral confidentiality: "A minister's breast should be like the old lion's den in the fable, into which many strange things were seen to enter, but out of which none ever returned."

As pastors, we are bound to hold unto ourselves all that is told to us (in terms of private confidences, confessions, guidance, and needs for comfort). This also includes sharing between pastors, in which we may ask for advice from another pastor (which is good practice), but still must hold the person's identity in anonymity. This rule can be broken if you receive consent from the congregant to share his or her case with another pastor directly, but only with their prior agreement.

I’ve also been reminded that the state of MA has enshrined this in law, protecting clergy confidentiality. The one exception is that there is a duty to report in cases of child abuse.

<https://casetext.com/rule/massachusetts-court-rules/massachusetts-guide-to-evidence/article-v-privileges-and-disqualifications/section-510-religious-privilege>

Nevertheless, Mark has attempted on multiple occasions after this reminder to extract information from discussions in which I provided the promise of pastoral confidentiality. As Mark knows, when someone comes to a pastor, this confidentiality is assumed whenever it

pertains to their needs for spiritual advice, confession, comfort, or prayer, and it covers both what is said to the pastor and what the pastor says to the congregant. In my role, I have congregants, elders, and other ministers who have asked for confidential counsel and prayer regarding personal challenges, church dilemmas, and difficult relationships, including those within the church itself and in relationship to Mark. These are protected conversations, both by Massachusetts law and pastoral ethics.

Mark has repeatedly tried to force me to violate this code and my own conscience, particularly in matters in which he is attempting to gain control through information about other ministers, staff, or congregants. In one particular instance, I was persuaded to violate the confidentiality of a congregant. With a great amount of grief, I went to this person, explained the situation, and apologized for my transgression. Thankfully, I was forgiven. The information that I carelessly shared was ultimately used in a negative way towards this person, and without Mark informing me of its use. A superior pressuring an inferior to obtain confidential information is bullying behavior as it uses one's position of authority to control and cause the unethical behavior of the other.

This has been a repeated issue. Mark has attempted to extract information from other confidential clergy conversations in regards to at least eight other people. In these instances it has been confusing to know how to respond because of the power differential between me and Mark as my supervisor. Often he has pressured me to disclose confidential information using various persuasion tactics, such as the guise that it is being done out of "concern for the health of the church." If I do not provide the requested information, these conversations often go on and on as he attempts to obtain information using various tactics for probing. It also came to my attention that Mark went to my own personal pastor in order to extract information from him about potential complaints or criticisms against Mark. This is shocking, illegal, a violation of the soul, and an affront to pastoral ethics.

The most recent use of Mark's position of authority to pressure me to break confidentiality, in regards to Shannon Jacobs, was the most abusive. In this instance, I was browbeaten in his office for an hour with Mark trying to extract information from the confidential clergy-congregant conversation that I had with Shannon after she resigned. I have had the privilege of serving as Shannon's pastor since she became the band leader, and I baptized her husband, Drew. Hence, Shannon not surprisingly desired to speak and pray with me soon after she learned of the actions to remove the 4pm service and to end her role as band leader. Despite my very clearly telling Mark from the start of the conversation that my interaction with Shannon was pastoral, not organizational, he would not relent or permit me to leave. Such clergy-congregant conversations are sacred. Nevertheless, he unrelentingly pressured me, using his position of authority over me to demand that I commit both an immoral and illegal action. I felt violated by his actions, as well as feeling sadness, confusion, and anger. Nonetheless, I did not give in.

1.2 A Toxic Culture of Staff Fear

There is a palpable sense among many on the staff that there is something terribly wrong in our church, and that Mark's leadership and actions have imbued fear. I can at this point faithfully claim that six pastors (both ministers and directors) and at least three support staff have

expressed fear of the possibility of losing their current jobs at the church for reasons described below. I am aware of one former support staff who left in part for this reason. Approximately three weeks ago, a staff member spoke to me at length about the personal and larger-staff harm of working within this staff's culture of fear, including the strong fear of being fired both by this person and by other staff to whom this person has spoken. This staff member had so much fear in sharing the information that the staff member was visibly shaking. This is an outcome of a toxic culture of fear.

As I've learned about how people feel, they have described the following characteristics:

- The importance of showing unquestionable loyalty to Mark.
- Constant wondering if “anyone else is going to be fired?” “Am I next?” There has been a psychological and social impact from the layoffs, especially the sweet, kind presence of Pat Chen + departures of Julie & Elisabeth + the distasteful dismissal of Kris Perkins + the thick, poisonous fog still hanging over us from the Kimberley Morrison debacle + the inexplicable marginalization of very committed senior ministers in Tammy, Tim, and Chris May.
- Frustration and shock for being “gagged” in speech, including being told by Mark that staff should not show any dissent, even in staff gatherings where discussion of issues is supposed to occur. Staff, including myself, have been explicitly told by Mark that all disagreement or concerns should be shared with him and not beyond him. This gagging of speech has suffocated staff morale, and made it clear that alternative voices are not just unwelcome, but can cause the person to be labeled “disloyal” and can result in negative repercussions (loss of one's position being a major concern). Of course, most are too fearful to say anything about this issue, but behind closed doors, when a staff member takes the risk to reveal his or her mind, many say that Mark controls speech to control the staff and ensure all activities within the church go according to his predetermined plan. This not only fosters fear, but suppresses the wonderful creativity and giftings of our ministers and staff. Even if one follows Mark's instruction (sharing only with him in private) as I have typically done, he politely listens and speaks kind-sounding words, but then nothing happens and he continues with his own plan. When I have persisted and pushed Mark on an issue, he will say things like: “I really understand what you are saying but this is why you are wrong” or “I've noted your opposition.” These words end the conversation, and there remains no willingness to change course.
- There is a strong sense among some staff that there are “safe” people to talk with and there are “moles” who will report back directly to Mark anything that might be construed as dissent or criticism. If anyone speaks to others about a matter of disagreement with his leadership, Mark will accuse that person of insubordination. I have experienced this on three occasions. It is notable that these other characteristics of our church culture - including this ‘mole’ system - match the key features of “toxic church cultures” outlined in the book *A Church Called Tov* (see chapter 2, “Early Warning Signs of a Toxic Culture”). The book also outlines characteristics needed for churches to grow in *tov* or goodness/flourishing. In light of the circumstances our church is in - including its toxic culture - perhaps the elders might consider reading this resource together.

This fear culture is spiritually confusing, undermining our ability to do ministry, distracting staff from doing the work of the church, and emotionally harmful and draining. Many on the staff feel deeply burdened and are exhausted. One person noted having sought out dedicated counseling in order to handle the stress of our work environment and recommended the same to me. Mark's need to control people and programs has destabilized relationships on staff. Many on staff feel disrespected and treated as cogs in a wheel. Mark has even repeatedly used derogatory language to describe some ministers, including calling some "mercenaries" - doing their job for the money only. He even directly used that language toward me, which I immediately corrected. As one pastor recently said to me in a moment of frustration: "Mark doesn't give a ___ about us."

To be clear, I am not able to describe what all the staff are experiencing - I imagine some are understandably too frightened to say anything and/or perhaps have turned a blind eye to these issues. Keep in mind as well that Mark is highly charismatic and if you are in his good graces, obeying his many requirements and his singular will for the church, then I can imagine one's relationship with him can be quite positive and even bring about elevation in one's status, since loyalty to his authority is a supremely valued characteristic. The benefits of conforming to Mark's standards, together with the negative consequences - even risk to one's job - that result if one resists these patterns in any way, can render this an appealing way of handling these issues. However, leadership that leads through fear, control, and suppression of others' ideas not only destroys staff morale, it impacts the entire church community that ultimately bears the negative consequences of a demoralized staff and of the suppression of the staff's many giftings and input (through the Holy Spirit) into the direction of the church. Out of concern regarding these issues, 9 of 25 people have taken a risk and in various ways spoken to me and/or others in describing our church's toxic culture of fear in private. I would presume that such sentiments are in fact shared by more than just those 9.

1.3 Aggressions

There are several instances in private in which Mark has denigrated the character of others.

1.3.1 Mark has spoken using derogatory language in front of me about two congregants and three ministers. Mark said to me that three of my fellow ministers are "lazy" (and having worked around them for some time, I do not believe that to be true). I have also been told by another minister that Mark has used derogatory language about me on more than one occasion.

1.3.2. Personal Aggressions: Mark has used aggressive and harsh words regarding my work at the church. **(a)** In the Spring 2023 he falsely accused me of being lazy, asking in a derogatory tone, "what do you really even do here?" He then warned me in that meeting, "I will be checking in much more regularly so that I'm more aware of what you are doing each day." **(b)** In my 360 review, he said that I was too quiet in staff meetings, but then he criticized me for speaking an alternative opinion in front of other ministers. I brought this inconsistency up in our 360 discussion, and he responded by chuckling at the inconsistency and left the criticism in my 360 unchanged. **(c)** In our 360 review we met over the course of three meetings for nearly five hours. In contrast, I completed the 360 reviews with Damian and Chris in one hour, over lunch, and with the intention of encouraging them in their wonderful work as pastors, in addition to

providing formative feedback to help them grow. By contrast, I came out of my 360 review meetings with Mark feeling personally attacked, emotionally demoralized, and exhausted.

1.3.3. Calling Removal of Prior Members “the Great Purge”: Mark made a harsh comparison between his desire to move members into the “inactive” membership category, and Stalin’s murdering of hundreds of thousands of his own citizens to solidify his power in 1937 (https://en.wikipedia.org/wiki/Great_Purge), by calling this process by the same name as the brutal historical event, “the Great Purge.” This took place during a Ministerial Leadership Team (MLT) meeting when he informed the ministers that a process was underway that would move members into the inactive category. As I sat immediately to his left and looking right into his face, Mark said under his breath, “the Great Purge.” I do not know if anyone else heard him. He said it with an evident demeanor of satisfaction and a tone of humor. A week or so later, I met with Mark and asked him about this language and tone. I told Mark that this choice of words and his demeanor conveying a sense of being happy that people have left our church, rather than sadness, is offensive. Mark said his words were not meant in the way that I took them. At a minimum, Mark’s apparent satisfaction with and the choice of these words to describe this process (even if the historical connection to the Great Purge by Stalin is entirely coincidental) demonstrate a worrisome insensitivity and lack of deep care for the flock.

1.3.4. Pretext against Shannon: Mark was saving an accusation against a staff member for an opportune time to justify ending her position. He did this in front of the MLT, which reinforces the fear culture.

In our MLT meeting in October 2022, Mark talked unkindly about Shannon Jacob’s motivations for her music ministry. In that meeting, Mark told the MLT and Nathan that eliminating Shannon’s position should not be concerning or upsetting to us or the congregation since Shannon’s work was primarily a “music gig” (the mercenary concept applied to Shannon). Mark further said that Shannon is not part of our community. I immediately challenged Mark on this claim. Shannon has been part of PSC and PSIF for ten years, she volunteered for the band for free when she first started attending, and she has served our church devotedly through her leadership of the 4pm band. I know personally through my long relationship with her that she has a deep love and commitment to PSC. After asking Mark on what grounds he was maligning her motivations for church service, Mark said because she goes downstairs to the Fellowship Hall during the sermon. However, he had never provided any feedback to Shannon regarding this action (her being in the Fellowship Hall during the sermon), something easily correctable.

After this meeting it dawned on me that what Mark was likely doing was saving this accusation of Shannon (she’s not part of the community... not staying for sermon) to use it as a rationale to eliminate her position. If it was an authentic concern, I said to Mark in a later meeting in November, “Why did you not address this with Shannon yourself if you thought it was a problem?” Mark’s response to me was, “I’m not going to address her at this point,” which was a non-answer. I then said to Mark that his bringing up this criticism in the MLT meeting was wrong and unkind. He was not raising this issue with the MLT for input on how to address Shannon regarding her behavior. Rather, he was using this criticism of her to justify the elimination of her position. This is an abuse of power to withhold a correction, only then to use

that issue as part of a larger plan to justify the elimination of her role. It also further illustrates why his June 2023 public apology to Shannon and the congregation (See point 3.5) was misleading.

1.3.5 A Weaponized Warning Letter: Mark falsely accused me of egregious actions, and wrongly employed a legal process against me as a warning

After praying and reflecting on Mark's intentions in the October 2022 meeting, and given my care for Shannon and my co-leadership of the 4pm service, I made the decision to let Shannon know that she should remain in the service during the sermon. I did not tell her anything about the larger reason why this issue was raised (the elimination of the 4pm service and her position). She then explained that after practicing all afternoon in preparation to lead the music, she and others in the band go to the Fellowship Hall (where they still listen to the sermon) in order to use the restroom and get a drink/eat a snack. I indicated to her that her practice made sense to me, but that "some people in the community perceive her action as not setting the best example and it may give some the impression that you do not consider yourself part of the congregation." I did not ask Shannon to keep our conversation secret, as I saw no reason why I shouldn't convey this constructive feedback since I am the co-lead of the 4pm service, and this issue does not pertain to music, rather the larger structure of the service itself. This conversation caused Shannon to become worried, and she asked Nathan about this feedback. Nathan then let Mark know that I had told Shannon to remain in the service.

On November 15, 2022 Mark accused me of (1) breaching confidentiality since the MLT worship discussions were confidential (we were not allowed to speak to elders or any other ministers about the proposal to eliminate the 4pm service), (2) breaking the chain of command (Shannon reports to Nathan), and (3) speaking negatively about the health of the church.

My response to him was that I in no way broke confidentiality: no person or content of those meetings were revealed. It is not uncommon or unethical to act on confidential information as long as that information is kept secure. There are many examples of this faced by pastors. I also reminded Mark that in our agreed upon job description as Associate Minister, I am the co-leader of the 4PM service. It was my responsibility to address a staff person's actions related to the service that were not related to music.

I had considered addressing this issue directly with Mark before talking with Shannon. The reason why I did not talk to him was twofold: (1) I wanted to deal with Shannon's perceived infraction quietly and not create any further tension in Mark's and my relationship. (2) I wanted to protect Shannon and give her the opportunity to change her behavior so she would not be further misunderstood and unknowingly cause an affront to Mark. In retrospect, I should have been more courageous and spoken to Mark directly.

On January 12, 2023 I offered an apology to Mark for not speaking to him first (email in addendum), but I would not and do not grant the charges against me that I violated confidentiality or broke the "chain of command". Even so, on January 24 I was handed a warning letter issued by the Personnel Committee (PC). The letter indicated that if I did similar actions in the future I would be subject to firing. I expressed not agreeing that this was (a) a

breach in confidentiality or (b) a violation of the ‘chain of command’ given the aforementioned rationale. Still, Mark demanded that I “yield” and sign the legal document. In response I invited Mark to eliminate the document and choose the way of love for the church and brotherhood. I suggested instead we co-write a covenant of relationship based on biblical principles and Scripture, which would then hold us both accountable. I indicated I would be more than willing to sign a co-written covenant based on Scripture, but not a legal document that does not have brotherhood intentions behind it (but rather seems as its goal a legal case for my removal). He declined. I was later informed that I would be further punished financially through the omission of a cost of living (not insubstantial) adjustment in my pay, given to all other staff members.

2. Gentle not quarrelsome (ἐπιεικής, ἄμαχος, 1 Timothy 3:3): “Gentle” is one who forgives much, yielding, does not insist, forbearing with others, magnanimous in spirit, kind; “Quarrelsome” refers to one who creates fights, does not seek the peaceable way, inconsiderate of others feelings, willingness to repress others.

2.1 Mark shows basic lack of empathy toward his fellow ministers. (a) He removed the experienced voices of Tim Leary, Tammy McLeod, and Chris May, from exercising any influence over the life of church for reasons never explained (beyond a fairly weak justification that they are part-time, which was long the case before his arrival). (b) He said to Ray in front of the staff in 2022: “Ray, can you imagine a time when PSIF no longer existed?” To question a leader concerning the future viability of his thriving ministry in front of the staff lacks empathy and kindness. Statements by Mark about dissolving PSIF were repeated two additional times directly to Ray, which I believe resulted in his understandable concern for the dissolution of this important ministry and concern for his own position. (c) After Mark arrived, my prior job was dissolved, and I was not given a job description from April 2020 through September 2021, 18 months. This is despite my asking on multiple occasions for clarification regarding my job role. Covid only explains a portion, but not all, of this unjustifiably long time. This is a sad and unhealthy manner to treat a fellow minister; and it hardly empowers for ministry.

2.2 In October 2022, Mark assigned me to preach on Leviticus Chapter Six. As I prayed and prepared, I thought it right to focus on Leviticus 6:1-8, highlighting the topic of divine forgiveness. After making substantial progress in my sermon, I informed the Communications Director on Wednesday of that week of the sermon title and Scripture readings (a standard practice). Mark expressed surprise and even annoyance at my selection of these verses. He then said that it was his intention for me to preach on Leviticus 6:8-13, and that he planned to address the earlier verses of Leviticus 6. We agreed it was an honest miscommunication. I then told Mark that I had already made good progress on the sermon, and I was sure that the emphases would be different enough from what he was planning to do. I also expressed concern that Lev. 6:8-13 was a bit obscure for preaching, particularly with such limited time to study the passage. Despite my strong concerns, Mark insisted that I change course and focus on this specific passage, resulting in my having to start sermon preparation over again with a new passage. I was being given three days to preach to 1000+ people on a biblical passage where there is almost no

commentary and few sermons. His insistence came across as insensitive and inflexible, and he did not acknowledge the predicament he was creating for me (or the impact on my family life). I was also sad to note that the later sermons he gave never overlapped in any way with the message I had previously planned.

2.3 On at least three different occasions, I was given the “silent treatment” for multiple weeks in a row in which Mark hardly spoke to me and did not meet with me. As an example, during a period of receiving his silent treatment, he would often only acknowledge me briefly and with a begrudging tone when I saw him in the morning. These would be the only words he would share with me for an entire day, though my office door is almost always open.

2.4 After reluctantly granting the “Associate” title after four months of negotiation, Mark never informed the staff or the congregation.

2.5 As noted above (1.3.5), in a meeting in the Spring 2023, Mark informed me that I would not receive an inflationary adjustment to my salary as a punishment for the perceived “violations”. In the same meeting that I was informed of this financial punishment, Mark requested that he be able to host the minister/director retreat (for a third year) at our family lake house in New Hampshire. I am unsure if the slight was on purpose, or if he simply lacked empathy regarding the incongruence of these two matters. Even so, it was our privilege to host the ministers.

2.6 On a Sunday evening at the 4 PM service, I did not put candles on the communion table - something in the past we did only intermittently. One minute before the service started, Mark arrived noticing the missing candles (why this specific item was noticed still strikes me as odd). He questioned me, asking me why they were missing. I quickly put the candles on the table. Afterward, I explained to Mark that I was the person who introduced the candles to the 4PM service, and we never used them for every service. He rebuked me and insisted that I not remove them again. I was surprised by his inflexibility on the matter, especially since I am named the “co-leader” of the 4PM service.

3. *Double-tongued* (δύλογος, 1 Timothy 3:8):

I have observed over the course of several years speech patterns that have been misleading or lacking truth. There are instances of (a) outright lies, (b) not keeping his word, (c) dissemblance where he does not reveal true motivations, which then uses someone for an undisclosed purpose, and (d) omissions of key information misleading people to his intended narrative.

There are multiple instances of Mark not telling the truth or giving misleading information to the staff, congregation, elders, or myself.

3.1 In January 2021, Mark told me that no ministers were going to be let go during the Covid lay-offs. I knew this was not in fact true, so I confronted Mark, and had 4-5 meetings with him, including with David Rix, until he finally admitted that ‘maybe his words were just a bit

dishonest'. Mark apologized. I accepted that apology, forgave him, and we agreed to rebuild trust. Unfortunately, however, I have seen this dishonesty continue, resulting in my discernment of this to be a pattern of behavior.

3.2 In January 2021 during a staff meeting that announced the letting go of current staff members, Mark informed the staff: "I foresee no other staff departures." This was a deception (noted as such by multiple ministers once Kris' departure became public), since Mark had already informed Kris Perkins weeks before he would have to leave the PSC staff. It was also the case that Elizabeth Lohnes had already notified Mark that she would be leaving the staff.

3.3 During a town hall meeting in the Summer 2021, after the congregation had been informed that Kris Perkins resigned, Mark said to the congregation that this was a "mutual decision". Mark gave the congregation the impression that Kris and Mark came to this understanding together. I have a written document and personal discussions from Kris Perkins explaining in detail that this was not a mutual decision. Kris' departure was forced on him, and Mark's words that it was a 'mutual decision' misled congregants presumably with the aim of minimizing negative feelings or repercussions towards him from the congregation (under whose authority he owes honesty).

3.4 On May 31, 2023 during the staff meeting, Mark was asked by a staff member an example of how he was feeling encouraged about this elder decision. Mark indicated to the staff how unified and healthy the Board of Elders were at this time, and that there was a real sense of unity. Meanwhile, almost no one was aware that Cindy Cutlip had resigned as an elder in March, and it was on June 8, 2023 that the congregation and staff were informed of her resignation. It is possible that this sense of elder unity Mark described to the staff was not purposely misleading. But at the least, it means that Mark's sense of unity and health is very different from what most congregants and staff members consider it to be.

During the June 9, 2023 Town Hall gathering, there were three instances of misleading statements.

3.5 Mark's apology to Shannon misled the audience. He said that he was sorry for not including Shannon in this process when in fact he had purposely not included her because he intended all along to remove her from her role as the 4pm Band Leader, since the plan was to end the 4pm service. He also stated that, "we did desire an ongoing role for Shannon in this transition and in the new integrated 8:30 service under Nathan's leadership." This statement for an "ongoing role" fails to articulate the minimal role it would now be and minimizes the damage done to a person having demoted them.

3.6 In responding to a question in the Town Hall about the 4pm service, Mark said that in terms of discussion with the full-time ministers, we did not come to agreement on the proposal, and that is "something that any of them can talk about". When Mark said this, Mark gave the impression that he was open to having the MLT speak as part of the congregational meeting, and

yet earlier that day, Mark instructed the MLT and the staff *not to speak* at the town hall, rather than any engagement should be with Mark first and also the elders. Mark told the congregation that the ministers were free to speak, when in fact he had told us privately beforehand that we could not speak and should only speak with him.

3.7 Mark said to the congregation in regards to the MLT that “I love my brothers who were in that room and who are here tonight: Julian, Michael, Ray, Damian, Adam...” I found this statement misleading by giving a false impression. Mark has never said such words to us as a group (or to me individually), so to hear him say it for the first time in front of the congregation while under duress, gives me the strong impression that Mark was saying this solely for the impression it gives, i.e., that he is a caring and sensitive leader (see the aforementioned issues which would speak to the contrary). If Mark really felt such love for his brothers, he would have long ago said this to us rather than use those words at an opportune time to create a positive impression of himself to the congregation - a time when he is under scrutiny. Again, this highlights a pattern of misleading, manipulative speech.

On at least four occasions Mark omitted critical information pertaining to actions he asked me to perform. I have concluded that Mark omitted the information because he supposed that I would not consent to his request if I was properly aware of the context. However, Mark desired my involvement to likely advance a plan to which I would not willingly consent.

3.8 On September 13, 2022 Mark messaged me that we should do a promo video together by Friday of that week (9/16) – the only instance in which Mark has requested that I appear with him in a video. Then on 9/15 at 7:30 AM Mark urgently texted me about doing the video at 11am that day. It caught me off guard given the sudden nature of the request and the urgency being expressed. After we made the video, it was posted the same day and included in the e-news (<https://www.youtube.com/watch?v=2oZ09Q36DoM>). But then without my knowledge later that same day, the Board of Elders’ letter went out to the congregation informing them that John Knight had been put on an involuntary leave of absence. I felt used in this instance and concerned that the real reason for the urgency of the video was to give the congregation an impression of my partnership with Mark at a time when he might be under scrutiny given the actions toward John Knight. The video released the same day as the letter indicating the removal of John Knight, and featuring both me and Mark together, implied my support of John’s leave (since most of the congregation likely then assumed that I was involved in high-level decisions like this one). This felt manipulative, hurtful, and based in a subtle form of deception of both of me and the congregation. Even if the timing were just a coincidence, Mark - knowing the letter about John Knight would be delivered that same day and my deep friendship with John - should never have asked me to do this video on the same day. The video could easily have been moved to another time and was hardly urgent/needing to happen that same day.

3.9 After Mark asked me to do a “training on shepherding” for the elders and ministers, he explained in person and over Teams (10/20/22) that this was to further prepare the elders to step into their (seemingly already agreed upon) shepherding role in regards to the regional fellowship

(RF) structure. I accepted this task, even though I had expressed deep concerns about this structure for the regional fellowships. Even so, because Mark gave me the impression that the elders were pressing forward with this model, this shepherding training was needed. But then on the day of the elder meeting when I had already prepared my PowerPoint slides, Mark revealed that afternoon (a few hours before the meeting) that the elders were still deliberating their role, and therefore he needed me to change several slides. Those slides were then edited into a *proposal* for elder shepherding (not a training) within the regional fellowships. The irony of it was that I was now the one *proposing* the shepherding model that evening to the elders. I did not refuse, but I felt tricked as it gave an impression among the elders that I was not only fully supportive, but even proposing this model. After the session, one of the elders thanked me for presenting, and then explained somewhat apologetically why he was not in agreement with the RF model of shepherding. I then informed him that I was not in agreement either, which caught him by surprise. Evident in the elder's surprise at my disagreement was the fact that putting me in that position created a misleading misperception of my support for the proposal. I was hurt and felt used and manipulated. Again, one can attempt to explain away these actions as not intentional and coincidence (though at some point when a pattern of behavior is seen we need to be "wise as serpents, innocent as doves" Matthew 10:16). Even assuming coincidence, Mark should have recognized the awkward position he was putting me in and made clear to the elders this was *his* proposal or perhaps simply taken over the proposal presentation to the elders.

Mark has not kept his word pertaining to promises around preaching.

3.11 During our lengthy negotiation of my current role concluding in October 2021, Mark did not agree to my request for a preaching arrangement where I would preach one time per month on a regular schedule (following the prior pattern practiced by Gordon and the Associate). The reason Mark gave was that he wanted to approach future planning for preaching with Julian and myself as a team. He explained his plan that we would talk through an upcoming series and work together in selecting Bible texts that would excite and interest each of us. Mark said that if I were preaching on a set schedule (e.g. the fourth Sunday of the month) then we would not be able to make text selections in chronological order of the text. At the time, I found this explanation illogical and insincere, but I gave in with the expectation that Mark would follow this.

In contrast, over the past 20 months, Julian and I have not been included in offering any serious input on any of the preaching series. Mark has asked for our thoughts on his predetermined ideas, but never have we made a decision together. As an example, for this most recent series on Psalms, we provided no input. Mark decided on the series and assigned us what Psalms we would preach on (e.g., Psalm 22 this past weekend). Furthermore, not once have I been invited to choose a text within a series as Mark had previously used as his rationale for a non-regular preaching schedule (and I assume this is the same for the other preaching ministers).

4. Not arrogant (αὐθάδης, Titus 1:7): meaning self-willed, stubborn, headstrong, fails to respect the rights of those who are served

Mark's leadership is highly controlling and at times spiritually inappropriate.

4.1 On multiple occasions Mark has restricted speech and even prayer. **(a)** In January 2020, soon after the layoffs of Pat Chen and others, right before one Sunday service began, Mark pulled me aside and instructed me that it would not be appropriate for me to pray for the staff members/minister who were laid off. He further instructed me that I was not to use their names. Those words felt spiritually inappropriate both in regard to not caring for those leaving through our prayers. It also felt spiritually inappropriate for Mark to be controlling how I pray. I also felt uncomfortable as the motivations behind his actions seemed to be centered on safeguarding his own reputation as opposed to being centered on caring for those who are grieving. **(b)** As previously noted, multiple staff members have been warned by Mark to not raise dissenting questions or challenge a decision in staff meetings. Rather, we are instructed to only speak with Mark in private. These warnings chill staff enthusiasm and imagination. This pattern of control silences opposition and suppresses the voices of our talented ministerial and other staff. **(c)** Before the June 2023 Town Hall meeting, Mark sent a Teams message to the entire staff instructing us not to ask questions at the meeting, and to only come to him (and then the elders) with any issues. The entire staff interpreted this to mean not to speak at the microphone. Several of the ministers found this shocking and told Mark so afterward.

4.2 Mark has systematically taken actions to disempower and separate staff and other leaders. I'll keep my observations only pertaining to the staff. **(a)** Mark disinvited Pastors Kris, Julian, and myself to elder meetings in January 2021. Several elders objected to this, but gave in after they were told that this was done only during the time to remove Kris Perkins, leaving the false impression that we would be invited back. However, after Kris was gone, Julian and Michael were never invited back. This has increased a lack of cohesion between the elders and ministers. **(b)** Mark disinvited the elders from attending weekday staff meetings. This separation disempowered the influence of individual elders. **(c)** The Ministry Leadership Team is not exercising "leadership" for the church (the language is a misnomer). We engage around relatively minimum matters of church life and vision. From my experience, often our "leadership" involves either listening to Mark or giving him feedback on a topic of his choosing, feedback which often is not adopted.

4.3 Mark exercised coercive tactics around the 4PM worship discussions.

- The MLT was sternly warned to not speak to elders about the worship discussion. It is unhealthy for ministers to be holding secret deliberations without prayer or discussion with the congregational elders. This is especially true within congregationalism.
- The MLT discussions in October 2022 consisted of Mark proposing his worship plan, and over the course of four meetings attempting to get the MLT members to agree with it. By the fourth meeting that fall (no changes were made to the proposal), four MLT members clearly expressed viewing Mark's proposal as seriously flawed because of the anticipated harm it would cause to congregants and the failure of the plan to be a strategic change that would reach university students and young people. For PSC to not have a fully contemporary worship service also was viewed as a serious mistake.

- After tabling the discussion, Mark urgently wanted to discuss the matter again in April 2023 (scheduling the meeting during Holy Week, and even trying to reschedule the meeting during Holy Week when conflicts arose). To my disbelief (and several others) the proposal was the exact same plan as the proposal first raised in October, without any modifications based on our four MLT meetings in the fall of 2022. It felt highly controlling, insensitive, and arrogant to have Mark bring the same proposal back to us despite our 4 prior meetings where the clear majority viewpoint was to make substantial changes in the proposal. It became clear to us that Mark had already made up his mind, and he was holding these meetings under the pretense of receiving our “input” when in fact he had no intention of using any of that input and making any changes.
- In the final MLT meeting on this topic on April 13, 2023, the day prior Mark provided the MLT with a description of the process and proposal. In regards to process he said, “I want each of you to know that I respect your opinions, perspectives, and gifts. I am hopeful for unity on this and for your support of the proposal. I’m hopeful I can lead us to a place of full support. If, however, after a good faith effort, we are not able to arrive at agreement, I do not think it is wise stewardship of PSC’s future to let disagreement cause us to simply keep doing what we are doing. As for steps forward, I will take the outcome of our discussion(s) to the BoE to engage with them on this topic. As the governing body of the church, the BoE will make the final decision as to what is implemented for worship at PSC moving forward. I will plan to represent any dissenting voices from our discussion to the MLT. It’s possible you may all be present for that discussion too.”
 - Mark’s opening statement in this document proposal made it very clear that no matter what the MLT members said, he was going forward with the proposal as it stood. The lack of change after multiple prior meetings on the topic additionally communicated that point.
 - So what did the MLT members do in response? We were sullen, and recognized that further real discussion with the senior minister was fruitless. While Jason was a witness to this final discussion, what he was not a witness to were the animated discussions in October in which 4 of 5 MLT were *clearly opposed* to Mark’s proposal. The April 13 meeting was just an empty shell of a meeting, as we all knew what the outcome would be.
- Did Mark “represent any dissenting voices” faithfully to the elders? The first clue that he had not took place on the Sunday after the elders voted to move forward, with the proposal almost entirely in place. An elder said to me (paraphrase): “I heard one of the MLT was strongly against the proposal, and I assumed it was you. Are you doing OK?” It was intended as a voice of care. Upon hearing this, I thought to myself, “What does [this elder] mean ‘I’m the only person who was strongly opposed?’” I then started asking more elders questions about how the MLT was represented. It became clear that the MLT’s clear opposition (4 of 5) was diluted by Mark’s words so that at least some elders were given an impression of a spectrum of viewpoints rather than a large majority being against the proposal as it stood. Having later clarified this question with Julian, Ray, Damian, and Adam, it became clear that 4 out of 5 of us: (a) believed that not having a full

contemporary service was a strategic mistake, and (b) if the elders made such an unfortunate mistake, then the 11 AM service needed to be the blended one.

- I also wonder if Mark's suggestion that perhaps the MLT would be invited to talk with the elders in person was subterfuge. It does not seem that Mark had any intention for the MLT voices to be directly heard by the elders.
- Mark's recent apology to the MLT for not listening to us and for his actions placing us in a difficult position does not ring authentic to my ears. A real apology would answer the question, "Why did I not listen to them?" This is the fundamental question. Is Mark sorry for not listening to us because that is the right thing to say, particularly as he is now in hot water? Or is he truly sorry for not listening because he recognizes that he was acting arrogantly by disregarding wise counsel, riding roughshod over his ministry partners, and forcing his self-will rather than trying to communally discern the will of the Holy Spirit? The latter would be the marks of a heartfelt apology, and none of those elements were present in the apology given. Moreover, Mark has given no apology for the subtle but clear misrepresentation of the MLT's viewpoints to the elders.

Mark has a tendency to make decisions for the church that make him center.

4.4 Lenten Discipleship Institute (LDI): **(a)** In 2022, Mark took over the booklet at the last moment, edited some of the initial content, wrote an opening welcome, and signed his name at the beginning. Most of the work in the booklet was completed by a combination of myself, Randall and Chris May. Having worked on many writing teams, it troubled me how he would take over at the last moment, insert himself at the beginning, and then give some appearance that he created it for the congregation. **(b)** In 2023, Mark took over LDI completely eliminating my role. Leading LDI is specifically part of my job description, but without conversation or even acknowledgement that he was doing so, the most enjoyable part of my LDI responsibility was taken away (spiritual formation and educational content creation), while I was expected to do the administrative tasks for LDI.

4.5 The 2022 Annual Report was altered by Mark with the "innovation" that instead of staff having their own voice, their role in the church would be in the third person. Essentially only Mark and the Moderator were permitted to write in their own voice.

4.6 Liturgical changes to our Park Street Church practices around communion have replaced our prior congregation-focused practice with one that places Mark at the center. One intentional change is that Mark has become the sole celebrant with no other minister standing next to him at the table (which had been the case in the past). Then beginning Maundy Thursday 2021, Mark introduced (without discussion) two additional symbolic actions. **(a)** Mark made himself first and then the ministers next to receive the elements, compared to our long prior practice where the elders/ministers received the bread together with the congregation and receive the cup last (I believe the far better symbolic action within our community is for the ministers and elders to receive last). **(b)** Mark serves himself the bread element. *He is the only person in the entire congregation who takes his own bread from the plate with his own hand.* Watch the youtube videos. He offers the body of Christ to those below him, but he will not receive it from his

brothers (I have offered the bread to him twice, and he has refused). Though these changes may sound unimportant and my notice of them petty, the entire worship meal is highly meaningful, symbolic, and speaks in powerful subconscious ways. We also must remember that our church has a long-held tradition as a congregational church of upholding the congregation as a holy priesthood and that our high priest is only Christ, not our senior pastor. Hence our prior practice of serving the congregation first, and the congregants serving the elements to one another, is powerfully fitting with our heritage as a congregational church body. The changes in these important symbolic liturgies that put Mark at the center is a larger symbol for his approach to leadership - his adoption of a senior pastor-centered, authoritarian and sometimes dictatorial model of leadership that violates the cherished heritage of Park Street Church as a congregational body.

Conclusion

It is with a heaviness that I have concluded that Mark does not meet the qualifications of a church officer as his patterns of behavior over an extended period of time are inconsistent with the necessity of being “not violent”, “not quarrelsome but gentle”, not “double-tongued”, and “not arrogant”. These attitudes and their outward expressions have not just persisted, but increased over time, despite multiple attempts of encouragement and correction. I say these words with love for our church and love for Mark. I sincerely desire and pray for his complete restoration. Nevertheless, these patterns are not in conformity to the biblical command for the pastor to be “above reproach” (1 Timothy 3:2; Titus 1:6).

The Scripture makes clear that charges against an elder should not be admitted without two or three witnesses (1 Timothy 5:19). I submit this as my testimony as one witness. I recognize that what I have described may be challenging to believe, but after working in close proximity and over an extended period of time, it is a conclusion that I can no longer hold to myself. There are multiple additional credible witnesses who, if given assurances of safeguard, will corroborate many of my claims and add to them.

Finally, it is with only the greatest amount of reluctance that I have submitted this document, per the insistence of the Moderator. I am heartbroken for our church and for the elders as we enter another difficult moment. We have moved from internal challenge to challenge, and with you I long for a new season of refocused energy, Kingdom-work, and perhaps most of all, peace and a fresh wind. I pray that the Holy Spirit shows you His will as far as next steps, and mightily blesses our dear Park Street Church in and through the challenge before us.

I submit this in good conscience, as a faithful narrative, of what I have seen and heard.

In Christian Love,

Michael