

**ADVISORY OPINION:**  
**THE CALL TO ORDERED MINISTRY: ORDINATION STANDARDS & PROCEDURES**

**WHAT IS ORDERED MINISTRY?**

Jesus Christ's ministry serves as the foundation and standard for all ministry. The basic form of ministry is the ministry of the whole people of God, from whose midst some are called to ordered ministries and particular functions.<sup>1</sup> The Church's ordered ministries described in the New Testament and maintained by the Presbyterian Church (U.S.A.) are deacons and presbyters, which include teaching elders and ruling elders.<sup>2</sup> Ordered ministries are gifts to the church to order its life so that the ministry of the whole people of God may flourish; ordered ministries in no way diminish the importance of the ministry of all members of the church.<sup>3</sup>

**HOW DOES ORDERED MINISTRY RELATE TO CALLING?**

As stated in the *Book of Order* G-2.0103, "the call to ordered ministry in the Church is the act of the triune God. This call is evidenced by the movement of the Holy Spirit in the individual conscience, the approval of a community of God's people, and the concurring judgment of a council of the Church."<sup>4</sup> Accordingly, the basic Reformed understanding of call involves a broader conversation between the triune God, the individual, the community and the calling council of the church.<sup>5</sup> In these conversations, we are called to be open to the guidance of the Holy Spirit (F-1.04) as we prayerfully listen and discern together an individual's call to ordered ministry.<sup>6</sup>

**CAN A PERSON BE PLACED IN ORDERED MINISTRY IN A CONGREGATION OR COUNCIL WITHOUT THE ELECTION OF THAT BODY?**

No. PC(USA)'s Constitution reminds us, "no person can be placed in any ordered ministry in a congregation or council of the church except by election of that body."<sup>7</sup> Candidates for ordered ministry "must have the approval of God's people and the concurring judgment of a council of the church."<sup>8</sup> Along these lines, the "government of this church is representative, and the right of God's people to elect presbyters and deacons is inalienable."<sup>9</sup> While the right to elect presbyters and deacons is inalienable, it is important to recognize that this right is not absolute and does remain bound by the constitutional framework of the larger church.<sup>10</sup>

**CAN A CANDIDATE BE ORDAINED SOLELY BY THE AUTHORITY OF A CONGREGATION?**

No. Ruling elders and deacons are elected by a congregation, but must be examined and approved by the session. Along these lines, F-3.0207 reminds us, "presbyters (ruling elders and teaching elders) and deacons are ordained only by the authority of a council." The councils of the church are the session, the presbytery, the synod and the General Assembly.<sup>11</sup>

**HOW MUST A COUNCIL CONDUCT A CANDIDATE'S EXAMINATION?**

Each examining council must conduct its examination "reasonably, responsibly, prayerfully, and deliberately."<sup>12</sup> Further, whether the examination and the ordination/installation decision comply with the Constitution of the PC(USA), and whether the ordaining/installing body has conducted its examination reasonably, responsibly, prayerfully, and deliberately in deciding to ordain a candidate for church office is subject to review by higher governing bodies.<sup>13</sup> Along these lines, each candidate must be examined on "an individual, case-by-case basis."<sup>14</sup>

**WHAT GIFTS AND QUALIFICATIONS SHOULD ORDERED MINISTERS POSSESS? (G-2.0104a)**

In addition “to possessing the necessary gifts and abilities” to fulfill their various duties, G-2.0104(a) of the *Book of Order* acknowledges deacons, ruling elders, and teaching elders “should be persons of strong faith, dedicated discipleship, and love of Jesus Christ as Savior and Lord.”<sup>15</sup> Further, a deacon, ruling elder and teaching elder’s “manner of life should be a demonstration of the Christian gospel in the church and in the world.”<sup>16</sup>

Discussing a candidate’s “manner of life” allows for a broad conversation about a variety of topics that may range from current spiritual practices and leadership style to a discussion about financial malfeasance, sexual misconduct or other ethical considerations. While councils do have the right to examine “manner of life,” these discussions must occur within the broader conversation around the individual’s call to ordered ministry. While a council may have a list of predetermined questions, it cannot have a list of predetermined answers defining or interpreting “manner of life” by outlining certain behavioral expectations since no lower council may define, diminish, augment or modify standards for ordination and must consider each candidate’s answers on an individual case-by-case basis.<sup>17</sup> Accordingly, it is important to recognize that the calling body cannot structure this conversation in such a way that it prevents a real conversation or precludes a conversation altogether through predetermined answers.

**WHAT STANDARDS FOR ORDINATION OF ORDERED MINISTERS ARE OUTLINED IN G-2.0104b?**  
***“Standards for ordained service reflect the church’s desire to submit joyfully to the Lordship of Jesus Christ in all aspects of life.”***

Our church takes seriously the commitment to serve and live in ways that reflect Jesus Christ – in our relationships, our work, and our involvement in our community and in the world. F-1.02 reminds us that “Christ is the Head of the Church” and we are called to be Christ’s body, one body with many members. The whole church determines these standards after the careful study of Scripture and theology, solely by the constitutional process of approval by the General Assembly (GA) and the approval of the presbyteries.<sup>18</sup> Further, the GA and the General Assembly Permanent Judicial Commission (GAPJC) may authoritatively interpret these standards.<sup>19</sup>

***The council responsible for ordination and/or installation “shall examine each candidate’s calling, gifts, preparation, and suitability for the responsibilities of ordered ministry.”***

It is helpful for a council to recognize that this conversation is about prayerful discernment and listening to each individual’s call, gifts, preparation and suitability to undertake particular ministries. Each individual’s call to ordered ministry is a matter for personal and communal discernment and is done on an individual case-by-case basis.<sup>20</sup> Along these lines, the PC(USA) commits itself not to exclude anyone categorically in considering those called to ordained service in the church, but to consider the lives and behaviors of candidates as individuals.<sup>21</sup> Accordingly, the faith community must listen for God as it discerns the individual’s call, gifts, formative experiences and study, and aptitude for the type of ministry under consideration.

The session is responsible for examining ruling elder and deacon candidates. In accordance with G-2.0402, after ruling elders and deacons are elected by the congregation,<sup>22</sup> the session “shall provide for a period of study and preparation” and “shall examine them as to their personal

faith; knowledge of the doctrine, government and discipline contained in the Constitution of the church; and the duties of the ministry.”<sup>23</sup>

The presbytery is responsible for the examination of teaching elder candidates.<sup>24</sup> In accordance with G-3.0306, “the presbytery shall examine each teaching elder or candidate who seeks membership in it on his or her Christian faith and views in theology, the Sacraments, and the government of this church.”<sup>25</sup> Further, regarding the final assessment of teaching elder candidates, G-2.0607 states that evidence of readiness to begin ordered ministry as a teaching elder includes “a candidates wisdom and maturity of faith, leadership skills, compassionate spirit, honest repute and sound judgment.” Additionally, G-2.0607 outlines various academic and ordination examination requirements for teaching elders.<sup>26</sup>

***“The examination shall include, but not be limited to, a determination of the candidate’s ability and commitment to fulfill all requirements as expressed in the constitutional questions for ordination and installation (W- 4.4003).”***

Matters appropriate to examination shall include affirmations to the ordination questions in W-4.4003, as well as other matters deemed appropriate by the council in examining the candidate’s qualifications, gifts, and skills.<sup>27</sup> The constitutional questions affirmed by teaching elders, ruling elders, and deacons during their ordination and installation include, but are not limited, to: seeking to follow and be obedient to the Lord Jesus Christ, accepting Scriptures to be the unique and authoritative witness to Jesus Christ and God’s Word, being guided by the confessions, governed by the polity of the PC(USA), and furthering the peace, unity, and purity of the church. In addition, teaching elders affirm that they will proclaim the good news in Word and Sacrament, teach the faith and care for God’s people, be active in government and discipline, and serve in councils of the church. Ruling elders affirm that they will watch over God’s people; provide for worship, nurture, and service; be active in government and discipline; and serve in councils of the church. Deacons affirm that they will teach charity, urge concern, and direct help to the friendless and those in need. All deacons and presbyters agree to try to show the love and justice of Jesus Christ. (W-4.4003). Since the examination shall include a determination of the candidate’s ability and commitment to fulfill the requirements listed in the constitutional questions each ordaining council should read, review and familiarize themselves with the constitutional questions in W-4.4003.

***“Councils shall be guided by Scripture and the confessions in applying standards to individual candidates.”***

The *Book of Confessions* and the *Book of Order* set forth the scriptural and constitutional standards for ordination and installation.<sup>28</sup> Along these lines, F-1.0203 reminds us “scripture teaches us Christ’s will for the church, which is to be obeyed. In the worship and service of God and the government of the church matters are to be ordered according to the Word by reason and sound judgment, under the guidance of the Holy Spirit.”<sup>29</sup> The confessions help guide the church in its study and interpretation of Scripture as well as help the church declare to the world who and what it is, what it believes and what the church resolves to do.<sup>30</sup> Along these lines, the General Assembly has affirmed the significant and instructive role of the *Book of Confessions* as a guide to interpreting Scripture in the examination of persons for ordination.<sup>31</sup>

**WHAT REFORMS WERE MADE TO THE CHURCH’S ORDINATION STANDARDS WITH THE PASSAGE OF AMENDMENT 10A?**

In the Spring of 2011, the majority of presbyteries approved Amendment 10-A, which changed the ordination standards previously found at G-6.0106(b) in the previous Form of Government as well as the current ordination standards found in the new Form of Government (G-2.0104(b)).<sup>32</sup>

The two main changes to the standards for ordination were:

1. Former G-6.0106(b) required a person called to ordered ministry to live either in fidelity within the covenant of marriage between a man and a woman or chastity in singleness.
2. Additionally, it proscribed a council from ordaining or installing any person who refused to repent of any self-acknowledged practice that the confessions call sin.

These two requirements were eliminated in favor of the broader standard delineated above in G-2.0104(b). Since this broader standard still requires that both the ordaining council and the persons called to ordered ministry be guided by Scripture and the confessions, each will be bound by their interpretation of Scripture and the confessions, and each will be guided by such in their respective decision making.

**HOW DO THESE REFORMS AFFECT THE CANDIDACY OF AN INDIVIDUAL IN A SAME-GENDER RELATIONSHIP?**

The 218th General Assembly (2008) adopted an authoritative interpretation (Item 05-09), which is now in effect:

Interpretive statements concerning ordained service of homosexual church members by the 190th General Assembly (1978) of the United Presbyterian Church in the United States of America and the 119th General Assembly (1979) of the Presbyterian Church in the United States and all subsequent affirmations thereof, have no further force or effect.<sup>33</sup>

The action of the 218th General Assembly (2008) to delete the 1978 and 1979 authoritative interpretations, coupled with the presbyteries’ approval of a new standard for ordination in 2011, means there is currently no specific prohibition against a session or presbytery ordaining or installing a person involved in a same-gender relationship.

In keeping with our historic principles of church order, each ordaining council (session or presbytery) will continue to determine the suitability of individuals called to ordered ministry within its bounds. The change in the language of the ordination standards does not require a council to ordain a person whom it determines does not fulfill the requirements expressed in the constitutional questions, Scripture, or the confessions.

**MAY A LOWER COUNCIL ADOPT STATEMENTS, POLICIES OR RESOLUTIONS THAT RESTATE, AUGMENT OR DIMINISH THE CHURCH’S CURRENT ORDINATION STANDARDS?**

No. The GAPJC has held that no lower council may define, diminish, augment or modify standards for ordination and installation of church officers.<sup>34</sup> Along these lines, where a presbytery adopted a resolution stating that it believed “manner of life of ordained Ministers should be a demonstration of the Christian gospel in the church and in the world, including living either in fidelity within the covenant of marriage between a man and a woman or chastity in singleness and will so notify candidates for ordination/installation and/or membership in the presbytery”, the GAPJC struck down this resolution in *Larson* holding that:

When [the] Presbytery combined current *Book of Order* language from G-2.0104a with former *Book of Order* language G-6.0106b, it created at least a perception of an improper restatement of the *Constitution*. As this Commission stated in both *Bush and Buescher*, ‘[r]estatements of the *Book of Order*, in whatever form they are adopted, are themselves an obstruction to the same standard of constitutional governance no less than attempts to depart from mandatory provisions.’

The GAPJC further held “that by directing the notification specifically to those who would potentially seek admission into Presbytery, the Resolution would have the practical effect of discouraging those seeking ordination or membership prior to the required case by case evaluation or examination.”<sup>35</sup>

**WHAT IS FREEDOM OF CONSCIENCE? HOW DOES THIS APPLY TO EXAMINING CANDIDATES?**

G-2.0105 states, “it is necessary to the integrity and health of the church that the persons who serve it in ordered ministries shall adhere to the essentials of the Reformed faith and polity as expressed in this Constitution. Insofar as may be possible without serious departure from these standards, without infringing on the rights and views of others, and without obstructing the constitutional governance of the church, freedom of conscience with respect to the interpretation of Scripture is to be maintained. It is to be recognized, however, that in entering the ordered ministries of the Presbyterian Church (U.S.A.), one chooses to exercise freedom of conscience within certain bounds. His or her conscience is captive to the Word of God as interpreted in the standards of the church so long as he or she continues to seek, or serve in, ordered ministry. The decision as to whether a person has departed from essentials of Reformed faith and polity is made initially by the individual concerned but ultimately becomes the responsibility of the council in which he or she is a member.”<sup>36</sup>

Accordingly, the decision as to whether a person has departed from essentials of Reformed faith and polity is made initially by the individual concerned, but ultimately becomes the responsibility of the council in which he or she is a member.<sup>37</sup> Standards for determining whether departures from essentials are permitted include whether the departure deviates from the constitutional standards (*Book of Confessions* and *Book of Order*), infringes the rights and views of others, or obstructs the constitutional governance of the church.<sup>38</sup> Accordingly, the council of membership has responsibility to determine whether any "scruples" declared by candidates constitute serious departures from the essentials of the Reformed faith and polity.<sup>39</sup>

**WHAT ARE THE ESSENTIALS OF THE REFORMED FAITH AND POLITY?**

PC(USA) does not have a legal code of behavior or a list of "essentials" of Reformed faith.<sup>40</sup> Attempts by examining councils to adopt resolutions, statements or policies that define, diminish, augment, or modify standards for ordination and/or declaring these as "essentials of Reformed faith and polity" are confusing and unnecessary and are an obstruction to constitutional governance.<sup>41</sup> Further, “it is not permissible for a presbytery or a session to define ‘essentials of Reformed faith and polity’ outside of the examination of any candidate for office. Such a determination must be made only in the context of a specific examination of an individual candidate.”<sup>42</sup> Additionally, requiring a candidate to subscribe to a particular interpretation of Scripture or the Constitution is not an acceptable practice.<sup>43</sup> It should be noted that only the General Assembly, by action of the assembly or through the General Assembly Permanent

Judicial Commission (GAPJC), has the authority to provide authoritative interpretations of the PC(USA)'s *Book of Order*.<sup>44</sup> An authoritative interpretation of the GA or GAPJC is binding on the councils of the church and the interpretation stands until such time as the GA or GAPJC modifies or changes it.<sup>45</sup> However, an authoritative interpretation may not "change any ordination standard found in the *Book of Confessions* or the *Book of Order*,"<sup>46</sup> since only an amendment to the Constitution can change ordination standards.

#### **CAN A CANDIDATE SCRUPLE OR REFUSE TO PERFORM A CONSTITUTIONAL FUNCTION?**

Inline with G-2.0105, the ordaining council must determine whether this scruple or refusal is "obstructing the constitutional governance of the church."<sup>47</sup> A session or presbytery does have the authority to determine that an examined candidate's refusal to fulfill constitutionally mandated functions on a regular and/or permanent basis exceeds the freedom of conscience granted in G-2.0105 and obstructs the constitutional governance of the church.<sup>48</sup> The examining council "cannot excuse a candidate's inability to perform the constitutional functions unique to his or her office."<sup>49</sup> Further, the council must counsel the candidate under examination that, once ordained or installed, she or he has a duty to fulfill constitutionally mandated responsibilities.<sup>50</sup>

#### **WHEN MUST A COUNCIL DETERMINE WHETHER A CANDIDATE HAS EXPRESSED A DEPARTURE FROM THE ESSENTIALS OF THE REFORMED FAITH AND POLITY?**

The proper time to determine whether a candidate has expressed a departure from the essentials of the Reformed faith and polity is at the time of the council's examination of the candidate for ordination, not determination of readiness for examination.<sup>51</sup> However, a presbytery has the responsibility to assess a candidate's or inquirer's suitability, fitness and readiness for ordered ministry throughout the preparation for ministry process.<sup>52</sup> Therefore, a presbytery may, for sufficient reasons, remove a candidate or inquirer at any point in the process, as long as the candidate or inquirer has been given the opportunity to be heard on the removal.<sup>53</sup>

#### **IS A COUNCIL'S EXAMINATION SUBJECT TO ADMINISTRATIVE REVIEW BY A HIGHER COUNCIL?**

"If a higher council learns at any time of an alleged irregularity or delinquency of a lower council, it may require the lower body to produce any records and to take appropriate action."<sup>54</sup> Whether the examination and the ordination and installation decision comply with the Constitution of the PC(USA), and whether the ordaining/installing body has conducted its examination reasonably, responsibly, prayerfully, and deliberately in deciding to ordain a candidate for church office is subject to review by higher governing bodies.<sup>55</sup> While a council has the responsibility to determine a candidate's suitability for ordination, this assessment may be overturned by higher a council on review only for "extraordinary reasons."<sup>56</sup> To this end, all parties should endeavor to outdo one another in honoring one another's decisions, according to the presumption of wisdom to ordaining/installing bodies in examining candidates and to the General Assembly, with presbyteries' approval, in setting standards.<sup>57</sup>

#### **WHAT HAPPENS WHEN ORDINATION STANDARDS ARE VIOLATED AFTER ORDINATION?**

Non-compliance with ordination standards or constitutional requirements by an individual already ordained may only be addressed in a disciplinary proceeding.<sup>58</sup> Further, the council of membership determines whether an ordered minister has departed from biblical and constitutional standards to find a member guilty of a disciplinary offense.<sup>59</sup>

<sup>1</sup> G-2.0101

<sup>2</sup> G-2.0102

<sup>3</sup> *Id.*

<sup>4</sup> G-2.0103

<sup>5</sup> For a YouTube discussion and training resource about PC(USA) ordination standards *see*:

<http://www.pcusa.org/resource/constitutional-services-pcusa-ordination-standards/>

<sup>6</sup> *See also*: 1 Samuel 3:1-10

<sup>7</sup> G-2.0102

<sup>8</sup> G-2.0104(a)

<sup>9</sup> G-2.0102; *see also* F-3.0106 recognizing, “that though the character, qualifications, and authority of Church officers are laid down in the Holy Scriptures, as well as the proper method of their investiture and institution, yet the election of the persons to the exercise of this authority, in any particular society, is in that society.”

<sup>10</sup> *See* Union Presbyterian Church, et al. v. Pby of Western NY. PJC (1985, 197-9, 118, 11.071)

<sup>11</sup> G-3.0101

<sup>12</sup> GA (2008, 42, 43, 379, Item 05-12)

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

<sup>15</sup> G-2.0104(a)

<sup>16</sup> *Id.*

<sup>17</sup> *See* PJC (2008, 218-10, Bush et al v. Pby of Pittsburgh); *see also* PJC (2012, 221-04, Larson et al. v. Pby of Los Ranchos)

<sup>18</sup> GA (2006, 28-29, 523, Item 06-01)

<sup>19</sup> *Id.*; *see also* G-6.02.

<sup>20</sup> GA (2008, 42, 43, 379, Item 05-12)

<sup>21</sup> GA (1998, 68, 166, 16.0220, 651, Ovt. 97-24)

<sup>22</sup> G-1.0503(a)

<sup>23</sup> G-2.0402

<sup>24</sup> *See also* GA (1990, 246, 21.217, Req. 90-20) noting that when an elder is ordained to the ministry of the Word and Sacrament (teaching elder) he or she is enrolled as a member of presbytery and deleted from the rolls of the congregation.

<sup>25</sup> G-3.0306

<sup>26</sup> G-2.0610 outlines certain possible exceptions to these requirements.

<sup>27</sup> *See* G-2.0104(a); G-2.0201; G-2.0301; G-2.0501.

<sup>28</sup> GA (2006, 28-29, 523, Item 06-01)

<sup>29</sup> F-1.0203

<sup>30</sup> *See* F-2.01; For a more detailed description and discussion of the role of the Confessions in the life of the church *see* “The Foundations of Presbyterian Polity: Chapter Two: The Church and Its Confessions”; *see also* “The Confessional Nature of the Church Report” added to the beginning of the *Book of Confessions* by action of the 209<sup>th</sup> General Assembly (1997).

<sup>31</sup> GA (2004, 17, 619, Item 08-12)

<sup>32</sup> GA (2012, 52, 55, 709, Item 07-22) confirming that G-2.0104(b) was amended when the new Form of Government was adopted.

<sup>33</sup> GA (2008, 42, 371, Item 05-09)

<sup>34</sup> PJC (2008, 218-10, Bush et al v. Pby of Pittsburgh),

<sup>35</sup> *See* PJC (2012, 221-04, Larson et al. v. Pby of Los Ranchos). In *Larson*, the GAPJC further noted, “in so doing, Presbytery exceeded its authority and duty to “bear testimony against error in doctrine and immorality in life, resolve questions of doctrine and discipline, give counsel in matters of conscience...” (G-3.0102) and its right and

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obligation to “nurture the covenant community of disciples of Christ ... includ[ing] ordaining, receiving, dismissing, installing, removing, and disciplining its members who are teaching elders...” (G- 3.0301c).”

<sup>36</sup> G-2.0105

<sup>37</sup> PJC ([2012, 220-10, Parnell et al v. Pby of San Francisco](#)). The GAPJC in *Parnell* acknowledged that since 1729 presbyteries have had full authority to determine whether a candidate for ordination adheres to the necessary and essential tenets of the Reformed faith.

<sup>38</sup> PJC ([2010, 219-08, 380, Bierschwale et al v Twin Cities Area Pby](#))

<sup>39</sup> PJC ([2008, 218-10, Bush et al v. Pby of Pittsburgh](#)). The GAPJC further noted in *Weir* PJC (1999, 211-2, *Wier v. Second PC*) that since the ordaining and installing council best knows the life and character of the candidate, initial and further inquiry as to compliance with all standards for ordination and installation belongs to that council. If a council has reasonable cause for inquiry based on knowledge of the life and character of candidate, it has the obligation to make inquiry and uphold all standards for ordination and installation. Consideration for inquiry is to be made solely on an individual case-by-case basis.

<sup>40</sup> PJC ([2010, 219-09, 384, Davis v. Pby of San Francisco](#)); *see also* PJC ([2008, 324, 218-15, First PC of Washington v. Pby of Washington](#)); The [Adopting Act of 1729](#) may offer a helpful discussion about the essentials.

<sup>41</sup> PJC (2008, 218-09, *Buescher et al v. Pby of Olympia*); *see also* PJC ([2008, 218-10, Bush et al v. Pby of Pittsburgh](#)).

<sup>42</sup> *See Barlow J. Buescher, et al. v. Presbytery of Olympia, Remedial Case 218-09*; PJC ([2008, 218-10, Bush et al v. Pby of Pittsburgh](#)).

<sup>43</sup> [1981 Rankin v. National Capital Union Pby](#). Again inline with PJC ([2008, 218-10, Bush et al v. Pby of Pittsburgh](#)), no lower council may constitutionally define, diminish, augment or modify standards for ordination and installation of church officers.

<sup>44</sup> G-6.02; *see also* G-3.0501(c)

<sup>45</sup> GA (1993, 78, 318, 21.040, Ovt. 93-100)

<sup>46</sup> [Barlow J. Buescher, et al. v. Presbytery of Olympia, Remedial Case 218-09](#).

<sup>47</sup> *See* G-2.0105

<sup>48</sup> GA (2012, 52, 55, 707, Item 07-21).

<sup>49</sup> GA ([2008, 42, 43, 379, Item 05-12](#)) *Note* G-2.0105’s limitation on freedom of conscience as it pertains to the “obstruction of constitutional governance.”

<sup>50</sup> GA (2012, 52, 55, 707, Item 07-21). The GA discussed this issue in the context of a teaching elder refusing to serve as the regular moderator of session whose members include individuals engaged in a same-gender relationship.

<sup>51</sup> PJC ([2010, 219-11, 390, Naegeli et al v Pby of San Francisco](#))

<sup>52</sup> *See* G-2.0603; G-2.0604.

<sup>53</sup> *See* G-2.0609; *see also* G-2.0607.

<sup>54</sup> G-3.0108(b).

<sup>55</sup> GA ([2008, 42, 43, 379, Item 05-12](#))

<sup>56</sup> PJC ([2012, 220-01, White v. Session of St. Paul PC](#)). *See also* [1981 Rankin v. National Capital Union Pby](#).

<sup>57</sup> GA (2006, 28-29, 523, Item 06-01)

<sup>58</sup> PJC ([2010, 219-08, 380, Bierschwale et al v Twin Cities Area Pby](#))

<sup>59</sup> PJC ([2010, 219-09, 384, Davis v. Pby of San Francisco](#))