

**HEARING PANEL OF THE DISCIPLINARY BOARD
OF THE EPISCOPAL DIOCESE OF COLORADO**

**THE EPISCOPAL DIOCESE OF
COLORADO,**

v.

THE REVEREND CHARLES LaFOND,

Respondent

Case No. 2019-0001

**RESPONSE OF THE RESPONDENT
THE REVEREND CHARLES LaFOND
TO THE STATEMENT OF ALLEGED OFFENSES (REVISED)**

The Respondent, the Reverend Charles LaFond, hereby responds to the Written Statement of the Church Attorney dated April 12, 2019 in accordance with the provisions of Canon IV.13.2(c):

AS TO THE ALLEGED OFFENSE
Alleging Conduct Unbecoming
a Member of the Clergy
In Violation of Canon IV.4.1(h)(9)

1. Respondent admits the allegations set forth in Paragraphs 1 and 2 of the Amended Written Statement of the Church Attorney.
2. Respondent admits the allegations contained in Paragraph 3 of the Amended Written Statement of the Church Attorney, except to deny information as to the truth of the allegation as to Complainant's belief.
3. Respondent admits the allegations contained in Paragraph 4 of the Amended Written Statement of the Church Attorney, except to deny that the friendship between the Complainant and Respondent included "alcohol related events;" and to deny information sufficient to form a belief

as to the truth of the allegation as to Complainant's developing "a serious dependence on the need for alcohol."

4. Respondent denies the allegations contained in Paragraph 5 of the Amended Written Statement of the Church Attorney except to admit that two friends of the Complainant, [REDACTED] and [REDACTED] met with the Complainant at Respondent's home for approximately 30 minutes on or about April 17, 2016.

5. Respondent denies the allegations contained in Paragraphs 6 and 7 of Amended Written Statement of the Church Attorney.

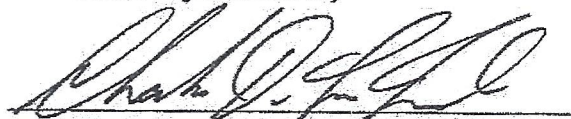
6. Respondent denies the allegations contained in Paragraph 8 of the Amended Written Statement of the Church Attorney, except to admit that Complainant and Respondent had no contact after Respondent moved from Denver to Albuquerque in June of 2017 "except for a lunch meeting in Santa Fe, New Mexico."

7. Respondent denies the allegations contained in Paragraphs 9, 10 and 11 of the Amended Written Statement of the Church Attorney.

8. The allegations set forth by the Church Attorney in his Amended Written Statement do not constitute the Offense of Conduct Unbecoming A Member of the Clergy in violation of Canon IV.4.1(h)(9).

9. Respondent specifically denies that he engaged in any "Conduct Unbecoming a Member of the Clergy" in violation of Canon IV.4.1(h)(9).

Faithfully submitted,



The Reverend Charles LaFond
Respondent

Dated: April 17, 2019