

**BEFORE THE HEARING PANEL OF THE DISCIPLINARY BOARD –  
EPISCOPAL DIOCESE OF COLORADO  
Case No. 2019-0001**

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STATEMENT OF ALLEGED OFFENSES PURSUANT TO CANON IV.13 (2)

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The Episcopal Diocese of Colorado

v.

The Reverend Charles LaFond  
Respondent.

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This Statement of Alleged Offenses (Revised) is made pursuant to Canon IV.12.1, as amended pursuant to Title IV.13.2, concerning the Referral to the Hearing Panel.

The Diocese by the Church Attorney alleges that the Respondent has violated Canon IV.1(h)(9) as follows:

1. At all pertinent times relevant to this matter the Respondent, The Rev. Charles LaFond, was and is a Member of the Clergy of the Episcopal Church canonically resident in the Diocese of Colorado.

2. At all pertinent time relevant to this matter the Complainant, [REDACTED]  
[REDACTED]  
[REDACTED]

The Alleged Offense  
Conduct Unbecoming A Member of the Clergy  
Violation of Canon IV.1(h)(9)

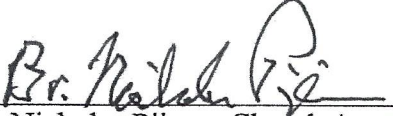
3. The Respondent and Complainant developed a relationship of friendship [REDACTED] through social events in the Diocese and private parties given by the Respondent beginning in the Fall of 2014 and ending on or about early Spring 2017. This friendship developed even though [REDACTED] the Respondent a well-respected priest and Canon at the Cathedral. The Complainant believed that the friendship was a close mutual friendship.

4. The Complainant and Respondent's friendship over that period of time included the consumption of alcoholic beverages, dinner parties and other alcohol related social events. Over this period of time the Complainant, up to and including April 17, 2016, developed a serious dependence on the need for alcohol.

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5. On April 17, 2016 the Respondent and two other friends, [REDACTED] and [REDACTED] conducted an intervention with the Complainant over concern of [REDACTED] high consumption of alcohol. This intervention occurred in the home of the Respondent. At this intervention the Respondent told the Complainant that the Complainant, was an alcoholic and had to give up the drinking.
6. Pursuant to the intervention the Complainant received therapy and remained abstained from consuming alcohol for a thirty day period of time into May of 2016.
7. Upon the expiration of the thirty day abstention the Complainant slipped back into consuming alcohol and approximately eight weeks later Respondent invited the Complainant into his home for dinner, watching movies and the consumption of copious amounts of alcohol provided by Respondent.
8. The Respondent terminated these weekly dinner, movie, and drinking on or about the Spring of 2017 and no longer continued in contact with the Complainant except for a lunch meeting in Santa Fe, New Mexico.
9. Beginning in April 2016 Respondent was a Member of the Clergy who was in a position of trust and friendship with the Complainant. This position of trust existed through the fact that Respondent directed the intervention on behalf of the Complainant related to alcohol dependence, and that by taking advantage of this relationship was able to influence the Complainant to acquiesce in participating in the excessive consumption of alcohol over a period of visits, at the invitation of Respondent, to Respondent's home. This was an abuse of a relationship of trust by the Respondent over the will of the Complainant convincing [REDACTED] to do an act or enter into a pattern of behavior [REDACTED] would not have otherwise entered into.
10. The Respondent, through and by his conduct as a Member of the Clergy with respect to the Complainant repeatedly, over several months, prejudiced the reputation, good order and discipline of the Church, amounting to conduct of a nature that would materially discredit the Church or the Holy Orders conferred by the Church. This conduct included the breach of trust between one Member of the Clergy [REDACTED] and knowingly providing amounts of alcohol to a person who clearly had been under treatment for excessive alcohol consumption.
11. The allegations stated herein, if proved by clear and convincing proof, is ground for discipline.

Respectfully submitted:

  
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Br. Nicholas Pijoan, Church Attorney

4/12/2019