

No. 25-807

IN THE
Supreme Court of the United States

WILL MCRANEY,
Petitioner,

v.

THE NORTH AMERICAN MISSION BOARD OF THE
SOUTHERN BAPTIST CONVENTION, INC.,
Respondent.

**On Petition for a Writ of Certiorari to the
United States Court of Appeals
for the Fifth Circuit**

**BRIEF OF CURRENT AND FORMER
BAPTIST LEADERS AS AMICI CURIAE
SUPPORTING PETITIONER**

BRADLEY W. SNEAD
Counsel of Record
EVA M. GUZMAN
CONOR R. HARVEY
WRIGHT CLOSE BARGER
& GUZMAN, LLP
One Riverway, Ste. 2200
Houston, TX 77056
(713) 572-4321
snead@wcbglaw.com
Counsel for Amici Curiae

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INTEREST OF AMICI CURIAE¹

Amici curiae are current and former Baptist leaders. *See* Appendix (listing amici). Some are active or retired pastors of local Baptist churches. Some are or have been directors, officers, or employees of Baptist conventions and associations. Some hold or have held posts in the Southern Baptist Convention or its entities, including positions at Respondent North American Mission Board of the Southern Baptist Convention (“NAMB”). Some are simply members of Baptist churches who love their faith tradition. And many hold advanced degrees from Baptist seminaries. By their long experience and deep education, amici are experts on Baptist polity. All are firmly committed to the protection of religious liberty.

Because Baptists lack an ecclesiastical forum empowered to adjudicate disputes between autonomous Baptist bodies, Baptist leaders, past and present, have relied on secular courts to resolve disputes when adjudication does not require answering questions of faith, doctrine, or internal governance. The decision below directly affects the ability of amici to serve in Baptist ministry without forfeiting access to any forum, religious or secular, for redress of such wrongs, by extending the church-autonomy doctrine beyond its traditional role.

¹ All parties were timely notified of the filing of this brief, as required by this Court’s Rule 37.2. Pursuant to Rule 37.6, counsel for amici curiae affirm that no counsel for a party authored this brief in whole or in part and that no person or entity other than amici or their counsel made a monetary contribution intended to fund the preparation or submission of this brief.

SUMMARY OF ARGUMENT

The church-autonomy doctrine applies only to matters of faith, doctrine, or internal governance committed to religious authorities. It does not confer a general immunity from secular law or impose a rule of categorical non-adjudication whenever a religiously affiliated entity is involved in a dispute. A narrow component of that doctrine—the ministerial exception—safeguards a religious body’s authority to select, supervise, and remove its own ministers without secular interference. The exception presupposes an ecclesiastical relationship in which the defendant exercises authority over ministers and thus should not apply to legally and ecclesiastically autonomous entities merely because they voluntarily associate with each other.

The Fifth Circuit discarded that limiting principle. It extended the ministerial exception beyond ecclesiastical authority and anchored it instead in voluntary association among religious entities. That functional rule bars claims whenever adjudication implicates a religious entity’s employment-based decision, even if it neither employed the minister nor possessed authority over the employing body. In essence, it converts a shield for church governance into a rule of non-adjudication for secular claims.

For Baptists, whose polity is defined by autonomy, non-hierarchy, and the absence of an ecclesiastical tribunal to resolve disputes, this novel approach poses acute constitutional problems. By severing the ministerial exception from ecclesiastical authority, the decision below deprives Baptists of access to any forum—religious or secular—for redress of ordinary civil wrongs.

This case therefore presents a consequential question: Whether the church-autonomy doctrine—and particularly the ministerial exception—is confined to a religious body’s own exercise of ecclesiastical authority over its ministers, or whether it may be extended to autonomous entities based solely on voluntary association.

The Court should grant the petition for certiorari.

ARGUMENT

The church-autonomy doctrine protects religious institutions from civil litigation where resolving a dispute would require secular courts to intrude upon matters of faith, doctrine, or ecclesiastical governance committed to religious authority. *Our Lady of Guadalupe Sch. v. Morrissey-Berru*, 591 U.S. 732, 746 (2020).

Church autonomy, however, is a doctrine of limited scope, encompassing distinct and carefully bounded protections. It does not impose a rule of categorical non-adjudication whenever a religiously affiliated entity is involved in a dispute. *Id.* Nor does it confer a general immunity from secular law. *Id.* Rather, ecclesiastical abstention applies only when a dispute concerns a religious body’s internal decisions—such as when adjudication would require a secular court to decide ecclesiastical questions concerning the body’s own ministerial relationships or matters of faith, doctrine, or governance. *Cf. Watson v. Jones*, 80 U.S. (13 Wall.) 679, 733 (1871).

The decision below disregarded those limits by collapsing these distinct protections. It extended the ministerial exception beyond the bounds of ecclesiastical authority, relying solely on notions of voluntary association and cooperative partnership with other religious bodies, without citing a single decision or

treatise authorizing such an extension. *See McRaney*, 157 F.4th 627, 652 (5th Cir. 2025). The result is a transformation of church autonomy from a shield against doctrinal entanglement into a rule of non-adjudication untethered from ecclesiastical authority.

That extension creates serious constitutional problems for Baptists, a Protestant tradition with more than forty national groups (called denominations), many more regional and state groups, thousands of local churches, and about 200,000 ministers. Baptist churches and organizations regularly form voluntary associations in which the associated entities maintain their autonomy, neither ceding nor delegating authority to any other group. Indeed, Baptist entities are often simultaneously members of multiple associations. By severing the ministerial exception from ecclesiastical authority and anchoring it instead in voluntary association, the decision below nullifies core features of Baptist polity—autonomy, non-hierarchy, and the absence of any ecclesiastical tribunal—and deprives Baptist leaders of any forum, religious or secular, to redress many wrongs despite the availability of such forums to members of other faith traditions.

That error warrants this Court’s review. Properly understood, the ministerial exception protects only a religious body’s authority over its own ministers. Once that exception is set aside, the remaining claims here do not require adjudication of faith, doctrine, or ecclesiastical governance.

I. The Court should grant certiorari to define the limits of the church-autonomy doctrine and its “ministerial exception.”

The decision below presents a fundamental question about the scope of the ministerial exception: Whether it is confined to a religious body’s own exercise of ecclesiastical authority over its ministers, or instead may be extended to ministers of legally and ecclesiastically autonomous entities based solely on voluntary associations or cooperative partnerships. This Court’s cases describe the ministerial exception as protecting a church’s ability to “select, supervise, and if necessary, remove a minister without interference by secular authorities,” *Our Lady of Guadalupe*, 591 U.S. at 747, thereby protecting “the internal governance of the church,” *Hosanna-Tabor Evangelical Lutheran Church & Sch. v. E.E.O.C.*, 565 U.S. 171, 188 (2012). The Fifth Circuit departed from that understanding by severing the exception from ecclesiastical authority and anchoring it instead in voluntary association.

Clarifying that boundary is especially important in religious traditions—such as the Baptist tradition—that reject ecclesiastical hierarchy and lack any religious tribunal empowered to adjudicate disputes between autonomous bodies. Absent clarification, the decision below risks converting a doctrine designed to prevent doctrinal entanglement into a rule of categorical non-adjudication for secular tort claims, leaving some religious leaders without access to any forum, religious or secular.

A. The ministerial exception applies only within a religious body’s ecclesiastical authority.

The ministerial exception is a narrow but vital component of the church-autonomy doctrine. It protects ecclesiastical authority to select, supervise, and remove those who minister religion, free from state interference. *Our Lady of Guadalupe*, 591 U.S. at 747. The exception rests on the First Amendment’s protection of a religious organization’s control over its own internal governance. *Hosanna-Tabor*, 565 U.S. at 188, 194–95.

That protection, however, presupposes a relationship in which the religious defendant itself exercises ecclesiastical authority over the minister at issue. In this Court’s cases applying the exception, the defendant religious body exercised ecclesiastical authority to define the minister’s role, duties, and standing within the ministry, including the power to select, supervise, and end the relationship. Even when legally distinct but related entities have been sued, the exception has turned on the defendant’s own exercise of church governance over the ministry—not on mere cooperation, influence, or shared religious mission among autonomous organizations. Nothing in this Court’s precedents suggests that the exception extends beyond a religious organization’s own ministerial relationships or may be triggered by mere cooperation, influence, or shared religious mission among autonomous entities.

That limitation is essential. Without it, the ministerial exception would cease to operate as a protection for a church’s own internal decisions and would instead become a broad immunity for religiously affiliated actors who lack authority over the minister whose claims are at issue.

**B. Voluntary association does not supply—
or extend—ecclesiastical authority.**

The ministerial exception turns on ecclesiastical authority, not religious affiliation, cooperation, or shared mission. A religious body does not acquire authority over another body’s ministers merely because the two groups collaborate, coordinate, or pursue common religious objectives; authority must be conferred by the relevant religious polity.

This Court’s cases reflect that principle. In hierarchical traditions, ecclesiastical authority is often exercised through bishops, synods, conferences, or other persons or entities empowered to decide questions of faith, doctrine, and discipline. *E.g.*, *Serbian E. Orthodox Diocese for U.S. of Am. & Can. v. Milivojevich*, 426 U.S. 696, 699 (1976). In other religious traditions, authority may be exercised through congregational or collective decision-making structures recognized by the faith itself. *See N.C. Christian Conference v. Allen*, 72 S.E. 617, 618 (N.C. 1911) (“The churches of the congregational system often combine into associations, conferences, and general conventions. . . . [T]hese bodies, under the congregational system, are purely voluntary associations, for the purpose of joining their efforts for missions and similar work, but having no supervision, control, or governmental authority of any kind whatsoever over the individual congregations, which are absolutely independent of each other.”). Either way, abstention is warranted because secular adjudication would override a decision that religious polity assigns to a religious authority.

Consistent with that understanding, courts have thus applied ecclesiastical abstention in cases involving multiple legally distinct religious entities only where those entities operate within a shared structure that

assigns governing or supervisory authority over faith, doctrine, or governance. *E.g.*, *Starkey v. Roman Catholic Archdiocese of Indianapolis*, 41 F.4th 931, 945 (7th Cir. 2022); *Bell v. Presbyterian Church (U.S.A.)*, 126 F.3d 328, 332–33 (4th Cir. 1997). In those cases, abstention was justified not because multiple religious entities were involved, but because adjudication would have required civil courts to review or negate ecclesiastical judgments made by bodies empowered—under the denomination’s polity—to make them.

By contrast, where no ecclesiastical authority is empowered, under the relevant religious polity, to decide the matters placed at issue—matters of faith, doctrine, or ecclesiastical governance—abstention is unnecessary. *Cf. Watson*, 80 U.S. (13 Wall.) at 722. Voluntary cooperation, contractual partnership, or shared religious mission cannot substitute for ecclesiastical authority without transforming the ministerial exception into a generalized immunity untethered from the First Amendment’s underlying rationale.

Here, the Fifth Circuit effectively adopted a functional test that expands the ministerial exception beyond cases in which the defendant employed the plaintiff or exercised authority over plaintiff’s employer. Under that approach, a claim is barred whenever adjudication would require a court to examine or effectively adjudicate the minister’s relationship with a religious body—even if the defendant is a legally separate and ecclesiastically autonomous entity lacking authority over either the plaintiff or his employer.

In doing so, the court recast a tort suit against what it acknowledged to be a legally and ecclesiastically separate entity as an employment dispute, characterizing McRaney’s claims as an effort to “protest his dismissal from church leadership,” and treating the

absence of an employment relationship or ecclesiastical authority as constitutionally irrelevant. *McRaney*, 157 F.4th at 652. The court likewise held that tortious-interference and defamation claims based on unsuccessful employment opportunities and disinvitation from religious speaking engagements were barred because adjudicating causation would require a court to determine why those items failed—forcing the judiciary, in the court’s view, to choose between allegedly tortious pressure by a legally and ecclesiastical separate entity and independent ecclesiastical judgments about who may speak and represent the church’s message. *Id.* at 654. The resulting rule is not tethered to who holds ecclesiastical power, but to whether adjudication might require a court to examine the effects of a religious entity’s decision.

The court justified this expansion by reasoning that the availability of the exception cannot depend on how religious organizations structure themselves and that an opposite rule would disadvantage denominations with few or no paid clergy. *Id.* at 652; *see also Starkey*, 41 F.4th at 945; *Bell*, 126 F.3d at 332–33.

That reasoning conflates structural association with ecclesiastical authority. In doing so, it extends the ministerial exception beyond its core concern—preventing courts from choosing ministers or supervising church governance—and transforms it into a doctrine capable of barring secular tort claims against any religiously affiliated entity whenever those claims have foreseeable employment or ministry-platform consequences. That is more than any other federal appellate court has done to date. *See McRaney v. N.A. Mission Bd. of S. Baptist Convention*, 304 F. Supp. 3d 514, 519–20 (N.D. Miss. 2018) (noting “every case the [c]ourt has reviewed in which the ministerial

exception was applied involved a plaintiff who had been previously employed by the defendant religious organization *itself* (and not just employed by a related or affiliated organization).”).

C. There is no “Baptist Church”; thus, extending the ministerial exception beyond an autonomous Baptist entity’s ecclesiastical authority nullifies core features of Baptist polity.

Baptist polity is defined by the rejection of ecclesiastical hierarchy and the preservation of institutional autonomy. There is no centralized Baptist church, no denominational tribunal, and no authority empowered to govern Baptist churches. Each Baptist church is autonomous, governing its own affairs according to its governing documents and congregational processes. Baptist associations, state conventions, and national entities likewise retain independence and sovereignty within their respective spheres. Cooperation among Baptist bodies is strictly voluntary and does not entail the delegation or surrender of governing authority.

The Southern Baptist Convention’s own governing documents reflect this structure. Its statement of faith defines a Baptist church as “an autonomous local congregation of baptized believers,” emphasizing that “each congregation operates under the Lordship of Christ through democratic processes.”² Likewise, its constitution disavows authority over those churches and state and regional associations or conventions: “While independent and sovereign in its own sphere, the Convention does not claim and will never attempt

² Baptist Faith and Message 2000 art. VI, *available at* <https://bfm.sbc.net/bfm2000/#vi> (last visited February 9, 2026).

to exercise any authority over any other Baptist body, whether church, auxiliary organizations, associations, or convention.”³ Accordingly, Baptist entities may collaborate in mission work, funding arrangements, and strategic initiatives without abandoning any ecclesiastical authority.

That is precisely the arrangement at issue here. McRaney is a former leader of a two-state Baptist convention—in his case, the General Mission Board of the Baptist Convention of Maryland/Delaware (“BCMD”). His lawsuit alleges that NAMB, the domestic mission entity of the Southern Baptist Convention, tortiously interfered with his employment and post-termination employment efforts, inflicted emotional distress, and defamed him. NAMB and BCMD are legally and ecclesiastically autonomous Baptist bodies that cooperated pursuant to a Strategic Partnership Agreement (“SPA”). NAMB did not employ McRaney, possessed no authority to appoint, discipline, or remove BCMD personnel, and exercised no ecclesiastical authority whatsoever over BCMD’s faith, doctrine, or governance. And there is no such thing as a minister ordained by NAMB or the Southern Baptist Convention.

Under Baptist polity, no Baptist body possesses authority to govern another Baptist body’s internal affairs or adjudicate disputes arising between them. There is therefore no ecclesiastical decision-maker whose judgment a secular court would be required to review or override in adjudicating McRaney’s claims.

This distinguishes this case from *Starkey v. Roman Catholic Archdiocese of Indianapolis*, 41 F.4th 931 (7th Cir. 2022), *Bell v. Presbyterian Church (U.S.A.)*, 126

³ Southern Baptists of Texas Convention Constitution and Bylaws art. IV.

F.3d 328 (4th Cir. 1997), and similar decisions, where abstention applied because the defendant entities exercised ecclesiastical authority within a shared ecclesiastical governance structure. Here, by contrast, the relationship between NAMB and BCMD was voluntary and cooperative, not hierarchical, supervisory, or marked by any shared authority.

Extending ecclesiastical abstention to bar this suit would not preserve the independence of Baptist institutions. It would instead impose on Baptists a governance structure they have consistently rejected. Unlike hierarchical denominations that maintain church courts or internal adjudicatory mechanisms, Baptists have no ecclesiastical forums empowered to resolve disputes between autonomous Baptist bodies. That absence is not a defect; it stems from Baptist commitments to autonomy and non-hierarchy. Historically, Baptists have therefore relied on secular courts to resolve ordinary civil wrongs between separate entities when adjudication does not require resolving questions of faith or doctrine. *E.g.*, *Executive Bd. of Mo. Baptist Convention v. Mo. Baptist Univ.*, 569 S.W.3d 1 (Mo. Ct. App. 2019); *Executive Bd. of Mo. Baptist Convention v. Mo. Baptist Found.*, 380 S.W.3d 599 (Mo. Ct. App. 2012); *Executive Bd. of Mo. Baptist Convention v. Windermere Baptist Conference Ctr.*, 280 S.W.3d 678 (Mo. Ct. App. 2009); *Central Coast Baptist Ass'n v. First Baptist Church of Las Lomas*, 171 Cal. App. 4th 822 (Cal. Ct. App. 2007).

II. Even under the doctrinal-entanglement principle of the church-autonomy doctrine, the claims remain justiciable.

Setting aside the Fifth Circuit's novel expansion of the ministerial exception, the remaining limits imposed by the church-autonomy doctrine concern

only the adjudication of religious doctrine or ecclesiastical judgment.

Adjudicating the remaining claims here does not require a court to assess the religious correctness of any ministry's decision or to weigh competing ecclesiastical reasons for it. It requires only secular determinations: what NAMB said or did, whether any statements were knowingly false or improper, whether the conduct was intended to interfere, and whether actual loss resulted. A court may recognize that a job offer was withdrawn or an invitation rescinded following alleged interference without second-guessing a religious body's autonomy to reach that result for its own reasons. Treating any inquiry into causation or intent as an inquiry into ecclesiastical judgment would convert the ministerial exception from a protection for religious governance into a rule of categorical non-adjudication untethered from authority, employment, or doctrine.

The First Amendment does not give religious institutions "a general immunity from secular laws," such as civil laws prohibiting the interference with the business relationships and reputation of a non-employee. *Our Lady of Guadalupe*, 591 U.S. at 746.

The Fifth Circuit repeated that limitation yet essentially held that a state Baptist convention's former employee cannot seek judicial relief against a legally separate entity based largely on the theory that adjudication would require one to evaluate religious performance in employment as well as the veracity of mission-effectiveness accusations. That holding effectively treats tort claims brought by a church leader non-justiciable so long as there is a religious aspect to his job duties and any grievances made by any religious entity concern same, even if the claims

sound in ordinary intentional tort and are able to be litigated on neutral elements. This puts Baptists at risk of harm, including employment interference and character assassination. Even worse, for free-exercise purposes, it puts them at risk precisely because they operate in religious circles and are employed by religious institutions.

The Fifth Circuit analysis rested on a mistaken premise about the intent-based elements of McRaney's tort claims. The court began by assessing two pre-termination claims: tortious interference with contract and defamation. Because a tortious-interference claim requires an intentional act that was calculated to cause damage without "right or justifiable cause" thus resulting in "actual damage or loss," and because the elements of defamation include "a false and defamatory statement," the court reasoned resolution of such claims "would impermissibly require a court 'to define matters of faith and doctrine.'" *McRaney*, 157 F.4th at 650–51 (quoting *Our Lady of Guadalupe*, 591 U.S. at 746).

Questioning whether secular courts can "determine whether NAMB's decision to exit the SPA had 'right or justifiable cause'" unless they answer "inherently religious questions about the SPA's content or McRaney's conformance with it," "determine whether NAMB's conduct was the 'proximate cause' of BCMD's decision to terminate McRaney" while avoiding "a religious organization's internal management decisions," and decide it was 'false' that McRaney's leadership lacked Christ-like character," the Fifth Circuit determined they could not. *Id.* at 651. To the court, "determining *what conduct constitutes breach* of the SPA," a document it characterized as "inherently religious" in nature, "turn[s] on the resolution . . . of controversies

over religious doctrine and practice.” *Id.* (quoting *McRaney v. N. Am. Mission Bd. of the S. Baptist Convention, Inc.*, No. 1:17-CV-00080-GHD-DAS, 2023 WL 5266356, at *3–4 (N.D. Miss. Aug. 15, 2023)).

Intent-implicating elements of ordinary tort claims do not necessarily require courts to evaluate the validity of an asserted mission-based justification or to resolve ecclesiastical questions about faith, doctrine, or internal governance. They can instead require courts to examine secular predicates: what the defendant knew, what it said or did, and whether it acted deliberately or foreseeably caused harm. *See Drevlow v. Lutheran Church, Mo. Synod*, 991 F.2d 468, 471–72 (8th Cir. 1993) (reversing dismissal of claims for libel, negligence, and intentional interference); *Ogle v. Hocker*, 279 F. App’x 391, 395 (6th Cir. 2008) (“Whether a secular court may hear a tort suit despite the church autonomy doctrine turns on the availability of secular standards and the ability of a court to resolve the controversy without reference to religious doctrine.”). A court may assume—without deciding—that a religious defendant believed its conduct served institutional or mission-related interests and still determine whether the defendant knowingly made false statements or intentionally interfered with another’s employment or business relationships. *Cf. Gaddy v. Corp. of the President of the Church of Jesus Christ of Latter-day Saints*, 148 F.4th 1202, 1214 (10th Cir. 2025); *Bouldin v. Alexander*, 82 U.S. (15 Wall.) 131, 139–40 (1872).

By treating any inquiry into intent, justification, or causation as inseparable from evaluating mission execution, the decision below collapsed neutral fact-finding into ecclesiastical adjudication and converted church autonomy from a shield against doctrinal

entanglement into a broad immunity from otherwise applicable secular tort law.⁴

III. The Fifth Circuit’s decision creates a denominationally skewed no-recourse zone for ordinary tort claims.

By effectively insulating intentional torts from neutral adjudication, the decision below forecloses ordinary secular civil remedies in a wide range of cooperative settings. Its logic would prohibit courts from adjudicating defamation, interference, and emotional-distress claims whenever a religiously affiliated entity frames its conduct in mission-related terms, leaving affected individuals without any secular civil forum and transforming a doctrine designed to prevent doctrinal entanglement into a broad immunity from secular law.

Several alleged statements and actions of NAMB are at issue here. While some may involve matters of faith and doctrine, others do not. According to McRaney, NAMB “[f]alsely claimed that [he] ‘resigned’ from BCMD despite knowing that BCMD’s Board voted to terminate his employment,” Pet. at 11, “[f]alsely disparage [him], portraying him as unreasonable, greedy, and seeking to unfairly enrich himself, by disclosing confidential settlement negotiations,” *id.*

⁴ As the dissent below did, courts should assess whether claims implicate principles of church autonomy allegation by allegation, not determining a claim to be barred simply because one allegation touches religious matters. *E.g.*, *McRaney*, 157 F.4th at 661 (Ramirez, J., dissenting); *see also Patton v. Jones*, 212 S.W.3d 541, 548 (Tex. App.—Austin 2006, pet. denied) (“In cases relying on the ecclesiastical abstention doctrine, courts consider the substance and nature of the plaintiff’s claims to determine whether the First Amendment prevents subject matter jurisdiction.”).

(first alteration in original), and claimed a contractual “protocol had not been followed by [McRaney] in hiring of two key staff positions [because] NAMB was supposed to be involved in the process and wasn’t,” *id.* at 19 n.5 (ellipsis in original), among other things.

The dissent below noted NAMB “raised concerns about McRaney’s disregard for NAMB staff, as well as additional concerns about budget shortfalls and work allocations” *McRaney*, 157 F.4th at 655 (Ramirez, J., dissenting) (alterations in original). It also highlighted NAMB’s assertions that McRaney “‘would act unilaterally,’ offering positions to candidates and imposing additional requirements on church planters without its approval” in violation of the SPA because “NAMB and BCMD had agreed that the entities would act jointly and that ‘missionaries [would] go through the approval process of both [entities],” *id.* at 660 (Ramirez, J., dissenting) (alterations in original), and McRaney’s assertions that NAMB “called him a ‘troublemaker’ in order to ‘blackball him,” *id.* at 661 (Ramirez, J., dissenting).

Because statements and actions such as these involve neither matters of faith nor doctrine, tort claims based on such statements and actions should remain actionable. Applied consistently, the logic underlying the Fifth Circuit’s holding would be readily recognized as unacceptable in many parallel, secular settings:

- Imagine Dr. Sarah Chen, a physician employed by Small Regional Medical Group, an autonomous healthcare organization. Small Regional participates in a voluntary cooperative agreement with Big National Medical Group, a legally separate nonprofit that partners with regional groups to advance its medical-care mission through coordinated standards and practices. During a

dispute over compliance with the cooperative agreement, Big National tells hospital networks that Dr. Chen “resigned” from Small Regional after showing “serious and persistent disregard” for the cooperative program’s requirements. But Dr. Chen did not resign. In fact, Small Regional’s board voted to terminate her employment. Dr. Chen sues Big National for defamation.

- Consider Michael Thompson, an executive employed by Northern Education Convention, an autonomous entity. Northern operates under a voluntary cooperative agreement with United Education Convention, a legally separate entity that partners with regional conventions to carry out a shared educational mission. United informs Northern’s board that Thompson violated the cooperative agreement by unilaterally hiring two key staff members without United’s required consultation and approval, and that his conduct reflected a “serious disregard” of the partnership’s principles. Relying on those statements, Northern terminates Thompson’s employment. Thompson sues United for tortious interference with his employment contract.

These hypotheticals show how the decision below undermines access to secular legal relief for the alleged torts. Under the Fifth Circuit’s reasoning, courts would be barred from adjudicating ordinary tort claims whenever resolving falsity, intent, impropriety, or causation would require them to examine whether an individual’s conduct aligned with a cooperating entity’s understanding of how a shared mission should be accomplished—even where the claims turn on secular questions about what was said, what was

known, and the foreseeable harm caused by knowingly false or coercive conduct.

This consequence is especially acute for Baptists. Unlike hierarchical denominations that maintain ecclesiastical tribunals or internal adjudicatory mechanisms, Baptists lack church courts empowered to resolve disputes between autonomous Baptist bodies. Barring secular adjudication in this context would therefore leave Baptists without any forum for redress of secular wrongs, not because such disputes are ecclesiastical in nature, but precisely because Baptists reject centralized authority and hierarchy and embrace autonomy.

CONCLUSION

The church-autonomy doctrine is not a single, undifferentiated rule of non-adjudication, but a constellation of distinct constitutional principles. Two principles are at issue here. One—the ministerial exception—is bounded by the scope of a religious body’s ecclesiastical authority over ministers. The other—the prohibition on faith and doctrinal entanglement—may apply to claims of any type but is determined on a claim-by-claim basis, separately assessing the allegations underlying each claim. By collapsing these distinct principles into a single, immunity-like rule, the decision below extended the ministerial exception beyond ecclesiastical authority and foreclosed adjudication even where no doctrinal inquiry is required.

The Court should grant the petition for certiorari.

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Respectfully submitted,

BRADLEY W. SNEAD
Counsel of Record

EVA M. GUZMAN
CONOR R. HARVEY
WRIGHT CLOSE BARGER
& GUZMAN, LLP
One Riverway, Ste. 2200
Houston, TX 77056
(713) 572-4321
snead@wcbglaw.com

Counsel for Amici Curiae

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APPENDIX — LIST OF AMICI CURIAE**Current and Former Baptist Leaders**

E. Randall Adams, Ph.D., Director and Senior Bible Teacher, Capitol Ministries, Washington, D.C.; Executive Director and Treasurer, Northwest Baptist Convention (2013–2025); Church Outreach Team Leader, Baptist General Convention of Oklahoma (2004–2013)

Grant Arinder, Pastor, Bridgeway Church, Starkville, MS; Executive Committee Member, Mississippi Baptist Convention; Executive Committee Member, Golden Triangle Baptist Association

Bill Barker, Pastor, Wolffork Baptist Church, Rabun Gap, GA (2019–present); Associational Missions Director for the Rabun County Baptist Association (2020–2023); NAMB National Missionary to Appalachia and the Mississippi River Delta (2001–2017)

Alex Barrett, Pastor, Ridgeview Church, Fontana, CA

John Batts, former Pastor, First Baptist Church, Clear Lake, WA; former Trustee, Southern Baptist Convention Executive Committee; former Member, Southern Baptist Convention Nominating Committee

Joel Breidenbaugh, Ph.D., Executive Director of Missions, Greater Orlando Baptist Association, Orlando FL; Pastor, Gospel Centered Church, Apopka, FL; President, Florida Baptist Convention Pastors Conference; Associate Professor of Preaching and Pastoral Ministries, Liberty University; doctorate in Christian Preaching from Southern Baptist Theological Seminary with a minor in Baptist History

Jimmy Brumfield, layperson and leader; former First Baptist Church, Jackson, MS; Member, First Baptist Church, Madison, MS

Jim Brunk, Pastor, Cookson Baptist Church, Cookson, OK; former Associational Mission Strategist, Baptist General Convention of Oklahoma; former Director of Missions, Grady Baptist Association

Dr. Tom Buck, Senior Pastor, First Baptist Church of Lindale, Lindale, TX (2006–present); former Senior Pastor, Riverside Baptist Fellowship, New Port Richey, FL; doctorate from Southern Baptist Theological Seminary, Louisville, KY

Harold B. Bullock, Senior Pastor, Hope Church, Fort Worth, TX (1978–2020)

Ken Cavey, Pastor, Bethel Baptist Church, Ellicott City MD; former NAMB missionary; former staff, Baptist Convention of Maryland-Delaware; Moderator, Flat River Baptist Association; former Trustee, Golden Gate Seminary

Bruce M. Conley, Director of Missions, Blue Ridge Baptist Association, Boonsboro, MD

Randy Covington, Director, Capitol Ministries North America; former Executive Director and Treasurer, Alaska Baptist Resource Network

Jimmy Crosby, former President, Jacksonville Baptist Theological Seminary, Jacksonville, FL; Member, First Baptist Church, Starke, FL

Steve Dennis, Pastor, Fellowship Bible Church, Muskogee, OK; Moderator, Muskogee Baptist Association, Muskogee, OK

Joe Flegal, former Director of Evangelism & Church Health, Northwest Baptist Convention, Vancouver, WA

Russell Fuller, Ph.D., former Professor of Old Testament (tenured), The Southern Baptist Theological Seminary

Warren Gilpin, Pastor, First English Baptist Church, Frostburg, MD

Dr. Bobby Gilstrap, Executive Director, Michigan Baptist Convention (2011–2014); Executive Director, Stone Mountain Baptist Foundation (2016–2020); Associational Director of Missions, Huron and Southeastern Baptist Associations, Michigan (2001–2010)

Adrian W Hall, transitional interim Pastor; retired Evangelism Director, Northwest Baptist Convention

Thomas Hardy, Pastor, Peninsula Baptist Church, Portland, OR

Dr. Jeff Hessinger, Senior Pastor, Eagles Nest Baptist Church, Fruitland Park, FL; Pastor, First Baptist Church, Thompson Falls, MT; former Associational Missionary Strategist, Southeast Arkansas Baptist Network; former evangelism staff, Florida Baptist Convention

Dr. S. Grant Hignight, Associational Mission Strategist, Mercer & Thomas County Baptist Associations, Thomasville, GA

James Bo Holland, retired Church Planting Director, Oklahoma Baptist Convention; retired Associate Director, Tulsa Metro Baptist Network

Donna Jefferys, retired Executive Assistant and Officer Manager, Baptist Convention of Maryland/Delaware; Member, The Church at Covenant Park, Columbia, MD

Dale Jenkins, retired Pastor, Airway Heights Baptist Church, Airway Heights, WA; former Trustee, SBC Executive Committee; former President, Northwest Baptist Convention

Macy Langan, Member, East Pickens Baptist Church, Pickens, SC

David Leavell, Ph.D., Pastor, Faceville Baptist Church, Bainbridge, GA; Executive Board Member, Mid-South Baptist Association; former Executive Board Member in five Baptist associations; Executive Board Member, Tennessee Baptist Convention; former President, Tennessee Baptist Convention; Trustee, New Orleans Baptist Theological Seminary

Daniel A. Lee, Pastor, Bethel Baptist Church, Greenville, SC; active in Three Rivers Baptist Association

Rod D. Martin, J.D., former Executive Committee Member, Southern Baptist Convention; Founder and Chief Executive Officer, The Martin Organization, Inc.; Member, Conservative Baptist Network

Pat McCoy, Executive Committee Member, West Virginia Convention of Southern Baptist; Pastor, South Berkeley Baptist Church, Inwood, WV (2016–present); Church Planter, NAMB; American Association of Christian Counselors

Tom Melzoni, Senior Vice President, Horizons Stewardship, Cabot, AR; former Senior Executive Pastor, First Baptist Church, Dallas, TX; former Pastor, Central Baptist, Oak Ridge TN; Chair, Committee on Resolutions, Southern Baptist Convention (1988)

Gus Nelson, Dettman Law, PSC; University of Virginia Law School (1988); ordained Baptist preacher and current Bible teacher

Dan Panter, Pastor, McKenzie Road Baptist Church, Olympia, WA; President of the Northwest Baptist Convention (2021–2023)

Rick Patrick, Pastor, First Baptist Church, Sylacauga, AL; former Moderator, Bessemer Baptist Association, Bessemer AL; former Trustee, Alabama Baptist State Board of Missions

Dennis Phelps, Pastor, Coronado Baptist Church, Hot Springs Village, AR; formerly J.D. Grey Professor of Preaching, New Orleans Baptist Theological Seminary; Chair, Committee on Resolutions, Kentucky Baptist Convention (2003)

Dr. Timothy Pigg, Director, Conservative Baptist Network; Lead Pastor, Fellowship Church, Immokalee, FL; Adjunct Faculty, Northeastern Baptist College, Bennington, VT; Church Planting Trainer, NAMB

Chris and Judy Riley, Members, Island Church, Tierra Verde, FL

Robert D. Rodgers, retired Vice President and Chief Financial Officer, SBC Executive Committee

Martha and Bill Salters, Members, Park Place Baptist Church, Pearl, MS

William Schmautz, Pastor, East Valley Baptist Church, Spokane Valley, WA; former Moderator and Chair of Missions Committee, Inland Empire Baptist Association

Dr. Clint E. Scott, Senior Pastor, Hilltop Baptist Church, Green River, WY

Mike Stone, Pastor, Emmanuel Baptist Church, Blackshear, GA; Chairman, SBC Executive Committee (2018–2020); President, Georgia Baptist Convention (2017–2018)

David L. Thompson, former NAMB Trustee and Chairman of the Church Planting Division of NAMB (1999–2009); Secretary Treasurer, Southern Baptist Convention (Pastor's Conference) (2006); Pastor of North Pointe Community Church (1999–2014), Nashville TN

Hadley Thompson, lay leader; Director of Family Ministries in Greenville Community Church (Baptist Church)

Ben Trigsted, Pastor, First Baptist Church Castle Rock, WA; Vice President, Northwest Baptist Convention

Alton K. Vandevender, lay leader and Member, Riverside Baptist Church, Pascagoula MS

William Wolf, Executive Director, Center for Baptist Leadership

Steve Wolverton, Pastor, Canton Baptist Church, Baltimore, MD; former Trustee, Baptist Foundation, Baptist Convention of Maryland/Delaware

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Tim Yarbrough, Executive Director and Editor, Arkansas Baptist News (2010–2020); Church Relations Director, North American Mission Board (2002–2010); Communications Director, Missouri Baptist Convention (1995–2002); former Program Editor, Southern Baptist Brotherhood Commission (1989–1995)