

Federal judge dismisses McRaney case against NAMB

August 16, 2023

OXFORD, Miss. (BP)—A U.S. District Court in Northern Mississippi dismissed Will McRaney's lawsuit against the Southern Baptist Convention's North American Mission Board.

Senior U.S. District Judge Glen H. Davidson granted a summary judgment for NAMB Aug. 15.

McRaney, former state executive of the Baptist Convention of Maryland/Delaware, charged NAMB leaders with making defaming statements that influenced his 2015 termination from the convention.

"Considering all the facts in the record, the Court finds that it cannot adjudicate the Plaintiff's claims in this case without impermissibly delving into church matters in violation of the ecclesiastical abstention doctrine," Davidson's memorandum read.

The U.S. District Court in Northern Mississippi's dismissal hinged on the ecclesiastical abstention doctrine, which is "rooted in the First Amendment's free exercise clause" and basically states that courts cannot get involved if a claim revolves around ecclesiastical questions.

"Adjudication of the Plaintiff's claims in this lawsuit will clearly require the Court to inquire into religious matters and decision-making to a degree that is simply impermissible under the Constitution and the ecclesiastical abstention doctrine," the summary judgment report stated.

Also, the court stated it "agrees with NAMB that Mississippi state courts also clearly lack subject matter jurisdiction to adjudicate this dispute."

In a statement released early evening Aug. 15, NAMB officials said: “Since the outset, NAMB has consistently held that the accusations against our ministry are unfounded. We have also argued that, as Christian ministries, NAMB and others involved in this case should be protected by the First Amendment and should not be forced to endure scrutiny and intrusive examination from the courts.

“Our goal throughout this process has been to practice restraint in our public comments and to honor Christ in our actions. We continue to pray the best for the plaintiff and his ministry.”

In written comments to Baptist Press, McRaney said, “It is my view that the judge’s ruling is built around the erroneous concept of “THE” Baptist Church as a denomination like the Catholic or Methodist Church, however, the First Amendment clearly declares that the government cannot create or establish a religion. Unless this court’s ruling is challenged, the SBC, Baptist ministers, along with Baptist autonomy, cooperation, financial health, and missionaries will be under threat of loss and a form of hierarchy created.”

McRaney’s six claims against NAMB included two claims for interference with contract and economic relations, two claims for defamation and two claims for infliction of emotional distress.

The suit, originally filed in 2017, was dismissed in April 2019 when Davidson ruled the court could not consider McRaney’s claims because of the ecclesiastical abstention doctrine, which prevents the government from interfering in church or religious matters.

The [dismissal was reversed in July 2020](#) by the 5th U.S. Circuit Court of Appeals. NAMB fought the reversal all the way to the U.S. Supreme Court, but the high court sent the case back to Davidson’s court.

Davidson said the strategic agreement partnership between NAMB and the

BCMD weighed heavily in his decision. Saying the agreement is “steeped in religious doctrine,” the memorandum called McRaney’s role with BCMD “a position which by its very terms invokes the Church’s religious mission.”

It said McRaney “clearly served in a ministerial role and in which he had a primary role in conveying the Baptist Church’s message and carrying out its religious mission.”

Any ruling into the reasons for the BCMD to terminate McRaney, it continued, “would be a clear violation of the First Amendment and the ecclesiastical abstention doctrine.”

The court furthermore ruled the case should be dismissed rather than remanded to the state court, once again citing the ecclesiastical abstention doctrine as the reason the court would also be compelled to dismiss.

Compiled from reports by Scott Barkley of Baptist Press and Jennifer Rash of The Baptist Paper.

EDITOR’S NOTE: The year of the 5th Circuit Court of Appeals reversal was corrected from 2023 to 2020. The story, originally posted on Aug. 16, also was edited the next morning to include a response from Will McRaney after it was made available.