

# Closing a Local Church under ¶ 2549: Theology, Law, and Process

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## Abstract

This article explains the process and theology of closing a local United Methodist church under ¶ 2549 of the *Book of Discipline 2020/2024*. It emphasizes that closure is not simply a legal or property matter but a theological act of stewardship and connectional grace, ensuring that the ministry and assets of a discontinued congregation continue to serve the mission of the wider Church.

Grounded in the Trust Clause (¶ 2501) and the doctrine of connectionalism, closure occurs only when a congregation no longer fulfills its missional purpose or when its property is no longer used or maintained as a United Methodist place of worship. The process requires a ¶ 213 congregational assessment, legal review of property title, consultation with the district board of church location and building, and a membership transfer plan (¶ 229) to preserve pastoral care. Final authority rests with the annual conference, which may act on a district superintendent's recommendation or a local church's petition. In emergencies, ad-interim or exigent procedures (¶ 2549.4) allow temporary protection of property until the next conference session. Judicial Council Decisions—particularly 1490 (2023), 1512 (2024), 1517 (2025), and 1518 (2025)—clarify that ¶ 2549 cannot be used for disaffiliation or property separation and that all closures must follow connectional law and due process.

Ultimately, the article portrays closure as a liturgical and covenantal act—a way of transforming endings into new beginnings, where the legacy of a local congregation is redeemed for continued mission within the body of Christ.

## I. Introduction

The closing of a local church is among the most solemn and consequential acts within United Methodist polity. It touches not only the stewardship of property and endowments but also the pastoral care of congregants and the integrity of the connectional covenant. The *Book of Discipline 2020/2024* governs this process through ¶ 2549, a paragraph rooted in constitutional trust-clause theology (¶ 2501) and developed through decades of Judicial Council interpretation.

Recent Judicial Council Decisions—especially Decisions 1490 (2023), 1512 (2024), 1517 (2025), and 1518 (2025)—underscore that ¶ 2549 is a closure provision, not a pathway for disaffiliation or property separation. Understanding the law of closure requires attention to its grounds, procedural safeguards, and connectional implications.

## II. Theological and Legal Foundations

### 1. The Trust Clause as Constitutional Covenant

The closing of a local church cannot be understood merely as a property transaction; it is, at heart, an act of covenantal theology. The Trust Clause (¶ 2501) declares that “*all properties of*

*United Methodist local churches and other United Methodist agencies and institutions are held, in trust, for The United Methodist Church and subject to the provisions of its Discipline.*” This statement is not merely a legal device; it embodies the principle that all ministry resources—sanctuaries, parsonages, and endowments alike—exist for the mission of the whole connection. The Trust Clause has constitutional character within United Methodist polity. The Judicial Council has long recognized that it implements the connectional principle embedded in the Constitution’s Restrictive Rules (¶¶ 18–23). In Decision 1512 (2024), the Council reaffirmed that no local or annual conference action may “negate or nullify” the Trust Clause, for it represents the theological reality that the Church is *one body* whose mission is shared across boundaries of geography and culture. Property, therefore, is not owned in an absolute sense; it is entrusted for the sake of the gospel.

This idea has deep Methodist roots. John Wesley understood Christian stewardship as a form of holy living—“gain all you can, save all you can, give all you can”—and he organized the early Methodist societies under a pattern of mutual accountability and shared mission. The Trust Clause translates that spiritual discipline into a legal framework. When a congregation ceases to function, the Trust Clause ensures that its resources are redeployed, not abandoned, so that the mission continues through other expressions of the Church.

## **2. Connectionalism as Ecclesial Law**

Beneath the Trust Clause lies the broader doctrine of connectionalism, which the *Book of Discipline* describes as “not merely a linking of one charge conference to another” but “rather a vital web of interactive relationships” (¶ 132). Connectionalism is not only theological; it is also juridical. It gives rise to a form of governance that mirrors the checks and balances of constitutional federalism while maintaining the Church’s spiritual unity.

Decision 1444 (2022) articulated this clearly, describing connectionalism as “the universal thread out of which the temporal and spiritual fabric of the Church is providentially woven.” This decision—frequently cited in later rulings such as 1512 and 1518—situates all property, personnel, and procedural questions within a single ecclesial polity. Thus, when a church closes, the act must occur *within* this framework, not apart from it. The annual conference, as the basic body of connectional life, exercises stewardship on behalf of the whole denomination.

## **3. Closure as Ecclesiology in Practice**

The legal process of closure under ¶ 2549 reflects a theological conviction: that the Church’s mission endures even when a particular congregation’s season has ended. Closing a church does not end the ministry it once embodied; rather, it transfers the trust—the people, resources, and witness—into new forms of mission.

This perspective transforms closure from an act of loss into an act of grace. It affirms what Wesley called “*connectional holiness*”: a communal vocation to use every gift for the greater good of the Body of Christ. The required ¶ 213 assessment of congregational potential and the membership-transfer plan under ¶ 229 are therefore not procedural formalities but theological expressions of pastoral care and stewardship. They ensure that the people of God

and the assets of ministry remain within the covenant, serving Christ’s mission rather than private or sectarian aims.

#### **4. The Role of Law in the Economy of Grace**

United Methodist law, including ¶ 2549, functions not to constrain grace but to order it. The legal structures of the Church embody a practical theology of accountability—what Wesley might call “grace made visible.” The Judicial Council, in its oversight function, protects this grace by ensuring that procedural integrity matches theological intent.

When the Council, in Decisions 1512, 1517, and 1518, prohibited the use of closure as a “back-door exit,” it was not simply defending institutional property rights; it was upholding a sacramental vision of connectional belonging. To remain United Methodist is to remain in covenant with others, even when ministries close and resources shift. The law of closure thus becomes a testimony to the Church’s belief that death and resurrection are woven into its structure—that endings, when faithful, create space for new life in the Body of Christ.

The theological and legal foundations of ¶ 2549 converge in one principle: stewardship within connection. Property is held in trust; authority is exercised collegially; closure is undertaken not for separation but for renewal. Every procedural step—assessment, consent, vesting, and recordkeeping—embodies a theology of grace disciplined by law. To close a church faithfully, then, is to participate in the continuing reformation of the connection itself, where the mission of the whole always transcends the life of any single congregation.

### **III. Grounds for Closure (¶ 2549.1)**

Paragraph 2549.1 of the *Book of Discipline* (2020/2024) establishes the threshold grounds under which a local church may be considered for closure. It authorizes the district superintendent (DS)—in consultation with the bishop and the district board of church location and building (DBCLB)—to initiate the process when certain factual and missional conditions are met. These conditions are not punitive but pastoral; they mark moments when the congregation’s life cycle may have reached completion, and its ministry must be realigned with the broader mission of the Church.

#### **1. When the Church No Longer Serves Its Missional Purpose**

The first ground for closure arises when “*the local church no longer serves the purpose for which it was organized.*” This language recalls the basic purposes of the Church articulated in ¶¶ 201–204 of the *Discipline*:

- to make disciples of Jesus Christ for the transformation of the world,
- to be a community of faith, hope, and love, and
- to minister to the world in the name of Christ.

If a congregation ceases to engage meaningfully in worship, evangelism, service, or discipleship—or if it has become unable to sustain pastoral leadership, membership, or financial responsibility—then it may no longer fulfill the purpose for which it was chartered.

However, the determination of “no longer serving its purpose” is not purely numerical. United Methodist polity resists defining vitality by attendance or budget alone. The ¶ 213 assessment (required later in ¶ 2549.2(a)) must evaluate not only demographics and financial data but also spiritual fruitfulness and community context. A small congregation that remains faithful in witness and ministry may still be “serving its purpose,” while a larger but disengaged body may not.

Judicial Council Decision 1517 (2025) implicitly affirmed this holistic approach, noting that closure is legitimate only when genuine missional cessation—not administrative convenience—is demonstrated. The DS’s discernment, therefore, is theological before it is managerial: it asks not “Can this church survive?” but “Is its ministry still serving the purposes of Christ as defined by our Discipline?”

## **2. When Property Is No Longer Used or Maintained as a United Methodist Place of Worship**

The second ground concerns the physical stewardship of property. Closure may be warranted when *“the property is no longer used, maintained, or supported as a United Methodist place of divine worship.”* This criterion recognizes that buildings themselves can fall into disrepair, disuse, or abandonment, placing the annual conference at legal and financial risk.

This ground is especially relevant in rural or urban contexts where population shifts or economic decline have left historic sanctuaries empty. When a church is functionally dormant—no regular worship, no active membership, or no capacity to maintain insurance, utilities, or repairs—the DS may determine that the property no longer fulfills its sacred purpose.

Importantly, “not maintained” does not mean “temporarily under renovation” or “used for alternative ministry forms.” Many congregations share space with nonprofits or new church plants; such arrangements may fully satisfy the requirement that property be *used for ministry*. What triggers ¶ 2549.1(2) is a sustained abandonment of use or a breakdown of the congregation’s ability or willingness to maintain its trust obligations.

Decision 1490 (2023) provides interpretive support here. The Council upheld exigent-closure authority precisely to protect such properties from deterioration or misappropriation when a local body can no longer act. The decision confirms that stewardship of property is a *connectional duty*, not a local entitlement.

## **3. The Theological Balance: Mission and Stewardship**

These two grounds—missional cessation and property disuse—must be read together. The first is missional; the second is material. One speaks to the life of the congregation; the other to the stewardship of its assets. A closure recommendation should normally arise from a convergence of both: the people can no longer sustain effective ministry, and the property no longer serves that ministry.

When interpreted through Wesleyan theology, this balance mirrors the unity of spirit and discipline that shapes Methodist order. A church building, like any means of grace, is a vessel for

the gospel; when the vessel can no longer bear that grace effectively, the connection assumes stewardship to redirect it.

#### **4. Distinguishing Decline from Death**

A key pastoral challenge lies in distinguishing between a declining church and a dying church. Decline calls for revitalization; death calls for closure. The *Discipline* anticipates this discernment through ¶ 213, which requires an assessment of congregational viability before any closure is proposed. That study considers demographics, potential for new ministry, and alternative uses for the property.

If the assessment reveals reasonable prospects for renewal—through merger, shared ministry, or mission realignment—closure should be deferred. Only when such possibilities are exhausted, and when the congregation itself acknowledges the end of its viable ministry, does ¶ 2549.1 properly apply. This step transforms closure from an act *upon* a church to an act *with* a church, aligning with the Methodist ethos of conferencing and consent.

#### **5. Judicial and Administrative Implications**

The Judicial Council's recent jurisprudence underscores that these grounds must be applied faithfully and transparently. In Decision 1512 (2024), the Council criticized the misuse of ¶ 2549 as a “gracious exit” device, where the alleged ground for closure was contrived rather than factual. Similarly, in Decision 1518 (2025), the Council reaffirmed that the Trust Clause cannot be evaded by recharacterizing disaffiliation as closure. Both decisions imply that genuine closure must be fact-based and connectionally motivated, not driven by ideological or political disputes. Administratively, this means the DS must compile documentary evidence—minutes, attendance records, financial reports, and inspection findings—substantiating the stated grounds. The annual conference relies on this record when considering a closure resolution, ensuring the decision rests on verifiable facts rather than assumption.

#### **6. A Pastoral Vision of Closure**

Ultimately, the grounds for closure exist not to measure failure but to steward faithfulness. In the Methodist understanding, a congregation's ministry does not end when its doors close; it continues through the lives and witness of its members and through the redeployment of its resources. Closure, then, is the Church's way of acknowledging that resurrection sometimes requires letting go. When the DS and conference act under ¶ 2549.1, they do so not as executors of demise but as midwives of new beginnings—ensuring that what was entrusted to one community of faith may serve others in the ongoing mission of Christ.

### **IV. Preliminary Steps Required (¶ 2549.2(a))**

Before a local church may be closed, Paragraph 2549.2(a) requires the district superintendent (DS) to complete a deliberate and multi-layered process of discernment, consultation, and documentation. These steps ensure that closure is orderly, lawful, and connectionally faithful. They embody both due process and pastoral care, safeguarding against hasty or arbitrary decisions while affirming the Church's constitutional integrity.

The paragraph outlines four distinct preparatory requirements: (1) a congregational assessment under ¶ 213, (2) a legal review of property title, (3) consultation on property use with the district board of church location and building (DBCLB), and (4) a membership transfer plan under ¶ 229. Each serves a theological as well as administrative purpose, reflecting the United Methodist balance of grace and order.

### **1. The ¶ 213 Assessment: Discerning Potential Before Declaring Closure**

The first step calls for the DS to “guide an assessment of the congregation’s potential as provided in ¶ 213.” This requirement is both diagnostic and theological. Paragraph 213 provides the Church’s mechanism for evaluating congregational vitality, mission potential, and community context before taking any action to close or merge a church. It requires examining such factors as demographics, financial health, leadership capacity, missional engagement, and the presence of nearby United Methodist ministries.

This assessment reflects the Wesleyan belief that every congregation, however small, remains a vessel of grace and should not be declared defunct without careful spiritual discernment. In practical terms, the DS may convene a consultation team that includes conference staff, lay leaders, and community partners to review data and explore renewal possibilities.

The Judicial Council, in Decision 1517 (2025), underscored the importance of this step. The Council ruled that failure to conduct a proper ¶ 213 assessment constituted a material procedural defect, rendering a closure resolution incomplete and procedurally invalid. The assessment is thus not optional; it is the essential safeguard that distinguishes a faithful closure from an improper administrative dissolution.

### **2. Legal Opinion on Title, Reversionary Clauses, and Property Interests**

The second requirement mandates that the DS obtain “a legal opinion as to whether there are any reversionary clauses, rights of reentry, or other restrictions in the title documents.” This provision ensures that closure complies with both civil law and theological trust law.

Under American property law, many church deeds contain conditions—such as reverter clauses—that may trigger a return of property to heirs, donors, or previous owners if the property ceases to be used for worship. Failing to identify such conditions can expose the annual conference to litigation or loss of property.

In Methodist theology, this legal review is also an act of stewardship. Because all church property is held *in trust for The United Methodist Church* (¶ 2501), the conference has a moral obligation to handle title transfers transparently and honorably. The DS’s legal consultation—often conducted with conference chancellors or trustees’ counsel—ensures that closure actions reflect both *the law of the land and the law of the Church*.

### **3. Consultation with the District Board of Church Location and Building (DBCLB)**

The third step requires that the DS, together with the district board of church location and building, “develop a plan for the disposition or future use of the property.” The DBCLB functions as the conference’s land-use discernment body, charged with advising on the acquisition, sale, relocation, or repurposing of United Methodist properties.

In closure proceedings, this board ensures that property decisions align with broader missional strategy. The board's input might include recommendations for converting a closed church into a mission center, shared ministry hub, or housing for new church starts. This consultation prevents the purely transactional liquidation of sacred space and invites creative stewardship. Judicial Council precedent, particularly Decision 1490 (2023), affirms the DBCLB's protective role. In cases of exigent closure, the Council noted that the board's participation provides a necessary check on episcopal and DS authority, ensuring that vesting decisions serve the mission of the conference rather than expedience.

#### **4. Membership Transfer Plan under ¶ 229: Pastoral Continuity**

The final preparatory step is the development of a plan for transferring members of the closing congregation, in accordance with ¶ 229. This requirement embodies the Church's pastoral heart. Members are not "dissolved" when their church closes; they remain part of the covenantal people of God.

Paragraph 229 directs that members be transferred to another United Methodist church so that they continue to receive pastoral care, have voice and vote in the life of the Church, and remain accountable in discipleship. The DS typically coordinates this process with nearby pastors and church councils, ensuring each member is personally invited into a new fellowship.

The Judicial Council, in Decisions 1512 (2024) and 1517 (2025), has pointed to this step as evidence that ¶ 2549 presumes continuity within the United Methodist connection. Closure is not an act of separation but of *pastoral transition*. When faithfully executed, the membership transfer plan transforms closure from an ending into a re-gathering of the flock.

#### **5. Procedural Integrity and Documentation**

After completing these steps, the DS should compile a closure dossier—a comprehensive record including the ¶ 213 assessment, the legal opinion letter, the DBCLB's property-use plan, and the membership transfer plan. This dossier becomes the factual basis for the bishop's and cabinet's recommendation to the annual conference.

Paragraph 2549.2(d) states that *failure to complete every step does not invalidate the annual conference's action*, but Judicial Council practice makes clear that omitting major elements—particularly the ¶ 213 assessment—can undermine legitimacy. Proper documentation protects both the conference's legal standing and the church's moral witness.

### **V. The Decision to Close: Two Authorized Pathways**

The *Book of Discipline* grants the authority to close a local church to the annual conference—the basic unit of connectional governance in United Methodist polity. Under ¶ 2549.2(b)–(c), closure may occur through two authorized pathways, each designed to balance episcopal supervision, district oversight, and conference authority: (1) a *district superintendent-initiated recommendation*, and (2) a *local church petition for closure*. Both paths ultimately require the action of the annual conference, for only that body—composed of clergy and lay members together—may lawfully declare a church closed and transfer its property to the conference trustees.

These two routes ensure that closure decisions are not unilateral acts of hierarchy or local preference but collaborative expressions of connectional accountability.

### **1. The DS-Initiated Recommendation (¶ 2549.2(b))**

The first and most common pathway begins when the district superintendent, after completing all preparatory steps under ¶ 2549.2(a), recommends closure. This recommendation must be accompanied by the consent of the presiding bishop, a majority of the district superintendents, and the district board of church location and building (DBCLB).

This layered consent process embodies United Methodism's distinctive collegial and connectional governance. It prevents any single officer—whether bishop or superintendent—from closing a church unilaterally. The decision to recommend closure becomes a corporate act of discernment, balancing pastoral sensitivity with fiduciary responsibility.

Once these consents are obtained, the matter proceeds to the annual conference, which alone has authority to declare closure. Upon that declaration, title to all real and personal property of the local church immediately vests in the annual conference board of trustees (¶ 2549.2(b)).

The trustees then hold and administer the property “in trust for the annual conference,” subject to its direction.

The Judicial Council, in Decision 1490 (2023), affirmed this constitutional hierarchy: although exigent or interim actions may temporarily vest title for protection, formal closure belongs only to the annual conference in session. This safeguard ensures that closure decisions are deliberated in a representative body that reflects the Church's diversity of orders and voices. From a theological standpoint, this process reflects the Wesleyan belief that authority in the Church is always relational—shared, not absolute. The DS may discern, but the conference decides. This checks-and-balances system prevents both episcopal overreach and local isolationism, embodying the Methodist principle that connectional unity is the context for every act of governance.

### **2. The Local Church Petition (¶ 2549.3)**

The second pathway allows for closure to originate from within the congregation itself. Under ¶ 2549.2(c), the church council (or equivalent governing body), together with the appointed pastor and at least one lay member of the annual conference, may petition the annual conference to declare the church closed.

This route recognizes the spiritual maturity and agency of local congregations. A faithful church may discern that its mission has been completed, that resources can better serve the wider connection, or that sustaining the congregation is no longer feasible. Rather than waiting for a DS recommendation, such a church may voluntarily initiate closure in a spirit of graceful surrender and stewardship.

The petition must include sufficient documentation to demonstrate the same conditions required under ¶ 2549.1: that the church no longer serves its purpose or that the property is no longer used or maintained as a United Methodist place of worship. The annual conference, upon reviewing the petition and verifying compliance with the preparatory steps of ¶ 2549.2(a),

may then declare the church closed. Once again, title to all property vests in the conference trustees.

This pathway honors the principle of conferencing—the Methodist conviction that holy decision-making occurs through open, deliberative conversation among clergy and laity. It allows local members to participate actively in the discernment of their congregation’s future, turning what could be an experience of loss into an act of missional generosity.

### **3. Annual Conference Authority: The Final Decision-Maker**

In both pathways, the annual conference remains the decisive body. Paragraph 2549 situates closure within the same ecclesial level that ordains clergy, admits members in full connection, and defines mission priorities. This placement reflects the constitutional principle of balance: local churches are essential to the connection, but their existence and dissolution are subject to the conference that constitutes their covenantal home.

When the annual conference votes to close a church, it acts on behalf of the entire denomination. The decision must be recorded in the conference journal, noting the effective date of closure, the vesting of property, and the disposition of records and members.

The conference board of trustees then assumes all legal authority over the property, while the district superintendent completes the pastoral and administrative follow-up.

Judicial Council Decision 1512 (2024) reemphasized this point, warning that no bishop, cabinet, or committee may circumvent annual conference action by using closure language to effect a de facto disaffiliation. Only the conference’s legislative vote can close a local church, and only within the limits set by the Constitution and the *Discipline*.

### **4. Connectional Consent and Holy Closure**

Both authorized pathways embody the Methodist doctrine that authority flows through conferencing—not from hierarchical decree or congregational independence. Closure is therefore an act of connectional consent: the local church, the district, and the annual conference each participate in discernment, ensuring that the final decision reflects both pastoral wisdom and legal integrity.

At its best, this process mirrors the communal nature of grace. Just as Methodism arose from societies bound together by covenant, so too does the Church seek to end ministries in covenantal fashion—through consultation, prayer, and shared decision-making. The purpose is not institutional control but connectional faithfulness: to ensure that every church, whether continuing or closing, remains part of the larger story of God’s redeeming work.

## **VI. Ad-Interim and Exigent Procedures (¶ 2549.4)**

While ¶ 2549.2(b)–(c) describes the *ordinary* pathways for church closure—acted upon during a regular session of the annual conference—the *Book of Discipline* also provides for ad-interim action when immediate circumstances demand protection of property or continuity of mission. These provisions, gathered in ¶ 2549.4, recognize that crises do not always wait for the annual conference to convene. They allow the Church to act quickly yet still under disciplined authority. The purpose of these procedures is preservative, not permanent: they safeguard assets, maintain legal standing, and prevent harm until the conference itself can make a final decision.

As Judicial Council Decision 1490 (2023) affirmed, ad-interim vesting is *temporary stewardship under connectional supervision*, not a substitute for conference closure.

### **1. Voluntary Transfer of Property between Sessions (¶ 2549.4 [a])**

The first ad-interim procedure allows a local church—by action of its governing board—to voluntarily transfer title of all property to the annual conference board of trustees between sessions of the annual conference. This option is often used when a congregation recognizes that it cannot sustain its ministry but wishes to place its property safely under conference care while discernment continues.

Such voluntary transfer does not automatically constitute closure. Rather, it is a *holding arrangement* that places title in the hands of the conference trustees, who then manage, lease, or secure the property pending the next annual conference's vote. At that later session, the conference must determine whether to (1) declare the church closed, (2) repurpose the property for another ministry, or (3) reconstitute the congregation in some new form.

From a theological perspective, this voluntary transfer is an act of connectional trust and surrender. It allows a local congregation to acknowledge its limitations without severing the bond of covenant, entrusting its resources to the wider Church for continued mission.

### **2. Exigent-Circumstance Vesting (¶ 2549.4 [b])**

The second procedure applies when the bishop, a majority of district superintendents, and the district board of church location and building (DBCLB) determine that “*exigent circumstances require immediate protection of the property*.” In such cases, they may, by written consent, vest title immediately in the annual conference trustees—*without waiting* for a session of the conference.

#### **a. Purpose and Scope**

“Exigent circumstances” are defined broadly but always in relation to ¶ 2549.1’s two underlying grounds:

1. the local church no longer serves the purpose for which it was organized, or
2. its property is no longer used or maintained as a United Methodist place of worship.

Typical exigent scenarios include:

- Abandonment of the church building or parsonage;
- A sudden leadership or membership collapse leaving no functioning board of trustees;
- Insurance cancellation, foreclosure, or unsafe building conditions;
- Legal risk (e.g., unauthorized property sale or occupation by a group claiming independence).

In such moments, waiting several months for the annual conference to meet could endanger the trust property or expose the denomination to liability. Exigent vesting therefore acts as a protective intervention—not a disciplinary measure against the congregation but a stewardship response to emergency need.

#### **b. Disciplinary Safeguards**

Even in exigent situations, the *Discipline* requires three layers of concurrence: the bishop, a majority of DSs, and the DBCLB. This tri-part structure ensures that no single authority can seize

control of property. Instead, the act reflects *collective episcopal and district discernment*, grounded in the connectional covenant.

### **c. Judicial Council Interpretation**

Decision 1490 (2023) clarified the nature and limits of exigent closure. The Council ruled that while immediate vesting of title is valid to protect church property, such vesting does not constitute final closure. The annual conference in session remains the only body empowered to decide whether a local church is officially discontinued under ¶ 2549.2(b). Any interim conveyance must be reported to the next annual conference, which then decides whether to confirm closure, repurpose the property, or reverse the vesting.

In the Council's words, exigent authority is "*custodial, not conclusive.*" This distinction safeguards the constitutional principle of shared governance and prevents the misuse of emergency provisions to accomplish closure without conference deliberation.

## **3. Administrative and Legal Responsibilities of Conference Trustees**

Upon vesting—whether by voluntary transfer or exigent declaration—the annual conference board of trustees immediately assumes responsibility for:

- securing the property (locks, insurance, utilities);
- assessing its condition and liabilities;
- ensuring compliance with local laws and denominational trust provisions;
- maintaining clear documentation of all actions.

Trustees act as fiduciaries of the connection, not as owners in their own right. Their stewardship continues until the annual conference directs final disposition under ¶ 2549.3, whether through sale, lease, or redeployment for new ministry.

Because title changes hands, civil filings must be executed carefully to avoid confusion over ownership or liability. Conference chancellors and legal counsel should be involved from the outset to record deeds and verify insurance continuity.

## **4. Theological Rationale: Urgency under Discipline**

The ad-interim and exigent provisions reflect a Methodist understanding of ordered freedom. The Church acknowledges that crises demand flexibility but insists that flexibility operate within covenantal boundaries. When bishops and superintendents act in exigency, they do so not as autonomous agents but as guardians of the trust.

Wesleyan polity assumes that law and grace are not opposites but partners: *The Spirit and discipline must go hand in hand.* Exigent action, rightly undertaken, is an embodiment of that partnership—swift enough to protect the Church's temporal assets, yet humble enough to submit to the judgment of the annual conference.

## **5. Pastoral and Ethical Considerations**

Ad-interim measures should always be accompanied by pastoral communication. The affected congregation, even if inactive, deserves clear notice that property vesting has occurred, an explanation of why it was necessary, and assurance that the annual conference will later

deliberate the matter publicly. Failure to communicate can breed mistrust and invite civil dispute.

Moreover, in cases where exigent vesting arises from congregational conflict or attempted disaffiliation, leaders must exercise restraint and transparency. Judicial Council Decisions 1512 (2024) and 1518 (2025) caution that invoking closure language to pre-empt due process in disaffiliation disputes constitutes misuse of ¶ 2549.4. The goal is protection, not punishment; preservation, not pre-emption.

## **VII. Effects of Closure**

### **1. Property and Insignia**

Upon closure, title vests in the annual conference trustees. They must remove United Methodist insignia from signage and literature and manage insurance claims related to property loss or damage.

### **2. Records and Archives**

The DS must collect all deeds, minutes, membership rolls, and cornerstone contents and deposit them with the conference commission on archives and history for permanent safekeeping.

### **3. Membership Care**

Members are to be transferred under ¶ 229 to nearby United Methodist congregations. *See* above Section IV.4. This pastoral step distinguishes *closure* (an act within the connection) from *disaffiliation* (a departure from it). Judicial Council Decisions 1512 and 1517 both cited the member-transfer requirement as evidence that ¶ 2549 presumes continued United Methodist identity.

## **VIII. Gifts, Endowments, and Sale Proceeds**

### **1. Handling Restricted Funds**

Conference trustees review all gifts and endowments of the closed church and dispose of them as the annual conference directs, subject to civil-law constraints. Decision 1461 (2023) clarified that once a donor's intent has been fulfilled (e.g., a building erected), closing the church removes ongoing restrictions on proceeds, unless a deed or statute requires otherwise.

### **2. The Urban-Center Rule**

If the property lies in a municipality of over 50,000, proceeds from its sale must be used for ministry within urban transitional communities (¶ 212). Decision 1282 (2014) held that this requirement is mandatory and not subject to conference discretion.

### **3. Non-Urban Proceeds**

Outside urban centers, funds may be used for new church starts, revitalization, or ministries with the poor as listed in ¶ 2549.3(b). Transparency in the trustees' report to the annual conference is strongly advised.

## IX. Judicial Council Case Law (2014–2025)

The Judicial Council has issued a series of rulings in recent years that collectively define and safeguard the lawful boundaries of church closure under ¶ 2549. These decisions clarify the difference between legitimate closure and improper use of closure provisions to accomplish disaffiliation or property transfer outside the connection. Together, they underscore that ¶ 2549 is an act of internal stewardship within the covenantal framework of the United Methodist Church—not a transactional device for separation.

### 1. Decision 1490 (2023): Exigent Vesting and Annual Conference Authority

In Decision 1490 (2023), the Council upheld the validity of *exigent closures* under ¶ 2549.4(b), confirming that a bishop, a majority of district superintendents, and the district board of church location and building may act ad interim to vest title in the annual conference trustees when immediate protection of property is required. However, the ruling emphasized that such ad-interim actions do not constitute final closure. The annual conference in session must ultimately vote to close the church. This decision preserved both practical flexibility and constitutional accountability, ensuring that urgent property matters can be addressed without bypassing the conference's authority.

### 2. Decision 1512 (2024): ¶ 2549 Is Not a Disaffiliation Pathway

The pivotal Decision 1512 (2024) drew a bright line between *closure* and *disaffiliation*. The Judicial Council held that ¶ 2549 cannot be construed as a “gracious exit” mechanism for congregations seeking to leave the denomination with their property. Instead, it exists solely to provide an orderly process for the discontinuance of local churches within the United Methodist connection. The Council grounded its reasoning in the constitutional nature of the Trust Clause (¶ 2501) and the Church’s doctrine of connectionalism, as previously articulated in Decision 1444 (2022). By reaffirming the Trust Clause’s theological and legal force, the Council prevented conferences from using closure resolutions to undermine connectional unity.

### 3. Decision 1517 (2025): Closure as Pretext and Procedural Defects

In Decision 1517 (2025), the Judicial Council addressed a case where an annual conference attempted to close a church under ¶ 2549 as a means of allowing the same congregation to reorganize independently and retain property. The Council found this action to be an improper use of the closure provision, reaffirming its earlier holding in Decision 1512. Moreover, the Council noted procedural deficiencies—most notably the failure to conduct the required ¶ 213 assessment of congregational viability—which rendered the process defective. This decision made clear that both the intent and the procedure of closure must conform to the *Discipline*’s requirements; a closure cannot serve as a façade for disaffiliation, nor can essential procedural safeguards be ignored.

### 4. Decision 1518 (2025): Reinforcing the Boundaries

Shortly after Decision 1517, the Council issued Decision 1518 (2025), further reinforcing that ¶ 2549 cannot be used to facilitate “sell-back” arrangements or property transfers to congregations newly organized outside the United Methodist Church. The Council rejected a conference’s attempt to use closure language to circumvent the Trust Clause by transferring

property to the same local members under a new corporate entity. Decision 1518 thus closed another potential loophole, confirming that property held in trust remains within the connection unless properly released under Discipline provisions authorized by the General Conference.

### **5. Decision 1461 (2023): Handling Restricted Funds upon Closure**

In Decision 1461 (2023), the Judicial Council addressed the treatment of donor-restricted funds and endowments when a church closes. The Council held that once the donor's designated purpose—such as the construction or use of a facility—has been fulfilled, the closing of the church generally terminates further restrictions unless civil law or deed language dictates otherwise. This clarification provides essential guidance to annual conference trustees responsible for redistributing endowment or legacy assets after closure.

### **6. Decision 1282 (2014): The Urban-Center Rule**

While older, Decision 1282 (2014) continues to govern the interpretation of ¶ 2549's "urban-center rule." The Council ruled that when a closed church is located in a municipality with a population exceeding 50,000, the proceeds from its sale must be used for ministries in urban transitional communities (¶ 212). This requirement is mandatory, not discretionary. The decision ensures that the closure of urban congregations contributes directly to renewed urban mission and justice ministries.

The Judicial Council's consistent message is unmistakable: ¶ 2549 is an instrument of faithful stewardship, not a means of withdrawal. Through these rulings, the Council has fortified the constitutional framework of the United Methodist connection, upholding both the letter and the spirit of the *Book of Discipline*.

## **X. Common Pitfalls and Compliance Strategies**

Despite the clear framework provided in ¶ 2549, errors and misunderstandings often occur in the implementation of church closures. These missteps can render the process vulnerable to challenge or, worse, compromise the connectional integrity that the provision was designed to protect. The following discussion highlights the most common pitfalls, together with strategies for faithful and lawful compliance.

### **1. Skipping the ¶ 213 Assessment**

One of the most frequent procedural lapses is the failure to conduct the congregational assessment required by ¶ 213 before recommending closure. This assessment evaluates the congregation's vitality, community context, and potential for redevelopment. In Decision 1517 (2025), the Judicial Council noted that omitting this step undermined the legitimacy of the entire closure process. The Council viewed the assessment not as a bureaucratic formality but as a theological discernment tool ensuring that closure is truly a last resort.

**Compliance strategy:** The district superintendent should document the assessment in writing, attach it to the closure recommendation, and include evidence of consultation with lay

leadership and the district board of church location and building (DBCLB). The assessment becomes part of the “closure dossier” submitted to the annual conference.

## **2. Using Closure to Facilitate Disaffiliation**

Another major misuse of ¶ 2549 arises when annual conferences or congregations employ “closure” as a vehicle for disaffiliation. Decisions 1512 (2024), 1517 (2025), and 1518 (2025) each addressed this pattern, ruling that closure cannot serve as a pretext to transfer property to the same members organized under a new, non-United Methodist entity. The Council characterized such actions as violations of the Trust Clause (¶ 2501) and of the Church’s constitutional connectionalism.

**Compliance strategy:** The stated purpose of closure must be genuine—the discontinuance of the local church as a United Methodist congregation. All documents, minutes, and resolutions should make clear that the property and membership remain within the denomination. Any intent to “reconstitute” the congregation outside the UMC should be treated as disaffiliation, not closure, and governed by separate General Conference legislation if available.

## **3. Misapplication of Sale Proceeds**

Financial missteps also pose risk, especially concerning proceeds from the sale of closed-church property. The *Book of Discipline* is explicit: if the property lies within an urban center exceeding 50,000 population, proceeds must support ministries in urban transitional communities (¶ 212). Decision 1282 (2014) held that this directive is mandatory and cannot be waived or redirected for other purposes. Likewise, Decision 1461 (2023) clarified that while donor restrictions generally lapse after the donor’s intent is fulfilled, trustees must still observe any ongoing civil or deed restrictions.

**Compliance strategy:** Conference trustees should prepare a written proceeds-use plan referencing both ¶ 2549 and ¶ 212, reviewed by the conference treasurer and finance committee. The plan should be reported to the annual conference journal, demonstrating transparency and accountability in the disposition of assets.

## **4. Neglecting Membership Transfers and Pastoral Care**

A less technical but equally significant pitfall involves neglecting the transfer of members following closure. The *Discipline* requires that membership records be transferred to another United Methodist congregation under ¶ 229, ensuring that no member is left without pastoral connection. The Judicial Council has pointed to this provision as evidence that closure is an act *within* the connection, not an exit from it.

**Compliance strategy:** The district superintendent should coordinate with pastors of nearby congregations to receive members formally. A pastoral letter should accompany the transfer, offering assurance of continued fellowship and care. This not only fulfills legal requirements but also honors the spiritual covenant of membership.

## **5. Confusing Exigent Action with Final Closure**

Finally, some conferences mistake ad-interim exigent actions (¶ 2549.4(b)) for final closure. Decision 1490 (2023) clarified that exigent vesting of title in conference trustees is temporary and protective; the annual conference in session must later vote on closure.

**Compliance strategy:** When exigent authority is invoked, the bishop and district superintendents should record their written declaration, including the specific circumstances deemed exigent. That record should be reported to the next session of the annual conference, where formal closure can be debated and confirmed.

## **XI. Conclusion**

The process of closing a local church under ¶ 2549 is one of the most delicate and consequential acts in United Methodist polity. It stands at the intersection of law, theology, and pastoral care—where legal precision meets spiritual compassion, and where the Church’s constitutional commitments to connectionalism and stewardship are tested in real communities.

At first glance, ¶ 2549 appears procedural: a list of prerequisites, consents, and vesting clauses. Yet beneath its legal form lies a profound theological truth: that property, like people, is entrusted to the Church for mission, not possession. When a local congregation no longer serves its original purpose, or when its building ceases to function as a place of divine worship, the connection assumes that trust—not as confiscation, but as continuity of grace. The assets, stories, and spiritual legacy of that congregation are not lost; they are carried forward into the life of the broader connection.

This is the heart of United Methodist constitutional law: connectional stewardship. Every closure, properly conducted, proclaims that the Church is larger than any one place or generation. The sanctuary that once nurtured faith now becomes seed for new ministries—urban centers of compassion, rural missions, new church plants, or revitalized congregations elsewhere. The people once gathered there are invited into other fellowships, their discipleship continuing without interruption.

The Judicial Council’s decisions from 2023 to 2025—notably 1490, 1512, 1517, and 1518—have reaffirmed this sacred balance. They remind us that closure is never a tool for withdrawal or division, but a disciplined means of preserving the unity and integrity of the Church. Decision 1512 (2024) especially reasserted that ¶ 2549 is not a disaffiliation pathway, while Decision 1517 (2025) exposed the dangers of using closure as a pretext for separation. Decision 1490 (2023) clarified that exigent authority protects property but never replaces conference deliberation, and Decision 1518 (2025) finally closed the loophole of “sell-back” arrangements to departing congregations. Together, these rulings build a consistent jurisprudence: *connectionalism prevails over convenience; covenant over contract; mission over possession.*

Yet closure is more than a matter of ecclesiastical law. It is a liturgical moment in the life of the Body of Christ. When a congregation is declared closed, the Church bears witness to both loss

and resurrection. Tears of grief mingle with prayers of gratitude. The final service is not an ending but a commendation—a ritual handing over of what has been to what will be. In that act, United Methodist law fulfills its theological purpose: to order grace, to sustain community, and to serve the mission of Christ through time.

For district superintendents, bishops, and trustees, the responsibility is both legal and pastoral. They are not merely administrators executing property transfers; they are stewards of memory and mediators of hope. Their work under ¶ 2549 safeguards not only the Church’s temporal resources but also its witness to a watching world—that endings can be faithful, that discipline can be gracious, and that even institutional death can bear the marks of resurrection. The closing of a local church, then, is not the story of failure but of faithfulness fulfilled. It affirms that every congregation, like every disciple, serves for a season within the greater communion of saints. When its work is complete, the connection receives its gifts and redeems its legacy for new life. In this way, United Methodist polity—anchored in the Trust Clause and illuminated by Judicial Council jurisprudence—embodies the gospel truth that nothing entrusted to God’s care is ever truly lost.