

# Mission Aviation Fellowship

## INVESTIGATION REPORT: SEXUAL MISCONDUCT BY JONATHAN SANTHOUSE

*The content available within this Report includes textual graphic descriptions of sexual activity or activity deemed inappropriate for a non-suitable audience. Discretion is required.*

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## I. EXECUTIVE SUMMARY

This investigation findings report was prepared in response to Mission Aviation Fellowship, Inc.'s ("MAF") request that Castañeda + Heidelman LLP ("C+H" or "Investigators") investigate complaints of sexual misconduct raised by two young women related to conduct by Jonathan Santhouse ("Santhouse"), a former employee with past involvement in MAF's Forge Harbour program for youth.

After an investigation, C+H determined that the complaints were substantiated. In summary, the investigation determined that:

1. *Jonathan Santhouse Engaged In Sexual Misconduct With Two Young Women Through MAF's TCK Program Called Forge Harbour*

The investigation has confirmed that in the fall of 2016 Santhouse, who was married with children and in his late twenties at the time, began engaging in sexual misconduct with a woman who was 18 years old that was a part of MAF's Third Culture Kid ("TCK") ministry called Forge Harbour. Third Culture Kids are children of missionaries who have grown up in a country different from their home country. After the young woman demonstrated emotional, psychological, and physical vulnerability during one-on-one life coaching, Santhouse progressed the interactions to physical contact and then sexual conduct (not including sexual intercourse). Over the course of the relationship, Santhouse manipulated the young woman to exercise control and further gain her confidences. The sexual misconduct took place in his car, a silver Volkswagen Jetta with tinted windows, at homes under construction near his house, and in his home. It continued after Santhouse left MAF in March 2019 until September 2020. The relationship between Santhouse and the young woman finally ended in May 2021 when the young woman confronted him for his conduct.

Santhouse's sexual misconduct toward the second young woman began after meeting her through MAF's Forge Harbour program when the young woman was 22 years old, and Santhouse was 30 years old. Like the first young woman, this young woman was also in an emotionally and psychologically vulnerable state. In a pattern previously exhibited with his first victim, Santhouse learned highly sensitive personal information through life coaching and then used his position of trust to coerce and manipulate the young woman into sexual acts. Santhouse's misconduct with the second young woman started in October 2018 and continued until April 2020. The conduct took place in Santhouse's car, the victim's car, homes under construction near his home, and at MAF HQ. The second young woman cut off ties with Santhouse in 2021.

With both young woman, Santhouse used code words to describe what he was doing. With the first young woman, he called it "#jetapy" (combining the first three letters of his car brand, a Jetta, and the last three letters of therapy). With the second young woman, he would call it "parking lot ninja" or "PLN." He also moved communications from MAF email to his personal email and instructed the young women to delete communications.

Santhouse departed from MAF in March 2019, but continued engaging in the sexual misconduct while working for a regional airline after his departure. Santhouse kept his sexual misconduct hidden from MAF. MAF learned of his sexual misconduct when one of the young women came forward and disclosed it in late 2021.



In the course of the investigation, the Investigators contacted Santhouse, but he refused to meet despite repeated requests. Santhouse's wife spoke with Investigators, confirmed that Santhouse had confessed to her in writing of what he termed "affairs," but declined to share his confession. Since that time, the Investigators have not been contacted by the Santhouses.

The investigation has concluded that Mr. Santhouse used his position as a coach and mentor to learn highly sensitive private information which he used to manipulate, shame, and coerce the women into engaging in sexual acts with him. The investigation also revealed that Mr. Santhouse engaged in efforts to evade detection and avoid acceptance of responsibility.

*2. No Additional Victims Have Been Found, But Santhouse Engaged In What Could Be Seen as Grooming Behavior with Other Young Women*

To date, the investigation has not identified additional women disclosing sexual misconduct by Santhouse. However, the investigation did uncover that Santhouse engaged in additional activity directed at other young women that could be seen as grooming behavior.

Specifically, 14 additional young women were identified who were affiliated with the Forge Harbour program or MAF and had interacted with Santhouse. These 14 young women ranged in ages from 18 to late 20's. The young women were interviewed and shared that they had not been subjected to sexual misconduct by Santhouse. However, the investigation confirmed that Santhouse engaged in behavior that could be seen as grooming with several of these women. Notably, Santhouse continued to contact 9 of these young women after he left MAF in March 2019.

The 14 young women shared varying experiences with Santhouse from positive to the uncomfortable. Some of the women shared disturbing interactions relating to Santhouse, as detailed more fully in the findings below. To give just a couple of examples here, one young woman recalled Santhouse asking her to walk alone in the woods during a teen Aviation Camp. She was 15 at the time and said the request made her uncomfortable. Another young woman remembered Santhouse persistently reaching out to her after she graduated from high school in 2017 and wanting to talk about her feelings. He then sent her messages via WhatsApp and email, which she ignored. A third young woman said that when she was 13 or 14 Santhouse took her by herself without her parent's permission to a fast-food restaurant in an attempt to connect with her. One young woman recounted Santhouse contacting her when she turned 18, asking about her future plans, and suggesting that they meet up in the future.

Based on Santhouse's past conduct, his actions with and communications towards these other young women could reasonably be seen as grooming behavior.

*3. MAF Had Five Main Organizational Gaps Related to Its Processes, Supervision, and Training That Santhouse Exploited*

As discussed in detail below, our investigation uncovered five main areas where MAF exhibited organizational gaps that were exploited by Santhouse.

- Santhouse's disclosed pornography problem was not accounted for in placing him in charge of the TCK Youth program.

- Santhouse’s supervisor overly trusted Santhouse and did not adhere to MAF’s established preventative guidelines and policies or set forth sufficient safeguards and accountability measures related to Santhouse’s one-on-one interactions with young women who were part of the Forge Harbour program.
- Santhouse’s supervisor and human resources leadership at MAF did not thoroughly investigate, document, or adopt safeguards in response to two concerns raised by MAF staff about Santhouse’s public interactions with young women.
- MAF leadership in human resources and member care did not implement an existing Manual on Sexual Abuse, know or abide by a mandatory reporting requirement, or execute consistent processes for documenting and investigating abuse and harassment.
- MAF currently lacks key guidelines for the TCK Youth program, abuse and harassment training, and accessible reporting channels for concerns.

## II. SCOPE AND METHODOLOGY

### A. Scope

The scope of this investigation included three main areas of inquiry:

1. Did Santhouse engage in sexual misconduct while working at MAF related to young women affiliated with the Forge Harbour TCK Youth program?
2. If so, are there other victims of Santhouse’s misconduct?
3. What organizational gaps existed at MAF at the time and what can MAF do better?

MAF has not placed any limits on the investigation or the scope of the investigation.

### B. Team

Our investigative team consisted of two former federal prosecutors with extensive experience in complex investigations along with a female employment attorney with decades of experience handling sensitive sexual harassment investigations. In addition, technology personnel assisted in retrieving electronic data. The investigative team included team members with diverse spiritual backgrounds to provide an objective view of faith-based organizations.

### C. Investigative Methodology

During the investigation, MAF’s Member Care, Human Resources, and Executive Leadership team have willingly and consistently cooperated and provided full and open access to its personnel, records, and data infrastructure.

The investigation included twenty-eight interviews in total. Specifically, interviews were conducted with: (a) the two women victims; (b) eleven current and former staff and volunteers of MAF;

(c) fourteen young women affiliated with the Forge Harbour Program; and (d) Santhouse's wife. Santhouse refused to be interviewed despite repeated requests. In addition, C+H Investigators reviewed and analyzed hundreds of emails, text messages, social media messages and other communications, public records, MAF policies, guidelines and manuals, personnel files, training records and materials, and other documentation.

During the investigation, C+H's Investigators communicated with MAF's investigation committee as well as the victims to provide updates and receive input on the direction and scope of the investigation, the findings, the report, and recommendations. To adhere to the wishes of the women, this report will not be identifying them or sharing identifying details.

### III. FINDINGS OF FACT

#### A. Jonathan Santhouse Engaged In Sexual Misconduct With Two Young Women Through MAF's TCK Ministry Called Forge Harbour

##### 1. *Santhouse's History with MAF*

Beginning in 2010, Santhouse began his involvement with MAF as a missionary pilot. After a time of fundraising, on July 22, 2011, Santhouse arrived at MAF headquarters ("HQ") for security training and orientation as a pilot mechanic. Beginning in March 20, 2012, Santhouse departed for language school in Central Asia which was completed on August 25, 2012. He then began work in Central Asia as a pilot/mechanic. Santhouse's time in Central Asia from 2012-2014 consisted of sporadic back and forth stays in Central Asia and the United States. In total, Santhouse served in the field for approximately 19 months spread over a 25-month period.

##### 2. *Birth and Development of TCK Youth Program Called Forge Harbour*

Early in 2015, Santhouse (who was 27 years old) transitioned to MAF's HR department in HQ doing part-time recruiting work (through the mobilization department) and part-time Member Care work (the department focused on caring for the overall wellbeing of staff and their families). Shortly thereafter in March 2015, he began work on a TCK Youth program that would later be called Forge Harbour that was run through the Member Care department. Beginning in the fall of 2015, Santhouse organized TCK youth events.

In 2016, Santhouse continued activities with MAF's teens including taking hikes. That winter in 2016, Santhouse also began grooming his first victim, a just turned 18-year-old female. When spring 2016 came around, Santhouse was spending a lot of time with TCK young women, including by taking (with his wife) two 18-year-old young women to a Christian worship concert and to his home regularly. As summer 2016 rolled around, Santhouse's interactions with MAF's teens continued. Activities included a camping trip, gatherings in his home, and hikes.

During this investigation, one event that summer stood out. Specifically, in July 2016, MAF hosted an "Aviation Flight Camp" in Cascade, Idaho, for 16-18-year-old teens. The Camp included other MAF pilots who gave talks on various aviation subjects and interacted with the youth. Santhouse attended the camp and was seen walking around with a younger teen girl, including to the back side of the hangar, which was a much more private area. Santhouse was also seen spending a lot of time with a

young adult female MAF advocate who was there volunteering. Two pilots and their wives also at the camp grew concerned by these interactions.

Once back at MAF headquarters in Nampa, one pilot shared his concern with his supervisor (another pilot) and together, they approached Santhouse's supervisor, the former Director of Member Care. During this meeting, these two pilots shared their concerns. They also expressed concern about having seen Santhouse sitting for a long period of time at a picnic table at the MAF campus with a female youth from the Forge Harbour program. One pilot expressed that this conduct exhibited a lack of discretion by Santhouse, and he thought that it was not appropriate for Santhouse to be meeting for a long period of time one-on-one with a single young girl. It felt "off." While Santhouse's supervisor does not remember the details of this conversation, according to the pilots, upon hearing these concerns, she told the pilots that what they were telling her were "serious" allegations. The pilots confirmed that they were "serious allegations" which was why they were talking to her about them.

In response, Santhouse's supervisor confirmed that she spoke with Santhouse and told him it was inappropriate. One of the pilots recalls Santhouse's supervisor saying she "cautioned" Santhouse. Santhouse's supervisor said she advised him not to walk behind buildings and to keep things in the open with someone of the opposite sex. She remembers that he was bugged by her comments and pushed back that it was not threatening. She told him that it was important to protect the females and himself.

During this investigation, the teen girl and young adult female MAF advocate were identified and interviewed. The young adult female MAF advocate stated that Santhouse did not act inappropriately toward her, nor did she see him act inappropriately with others. In contrast, the teen girl (now a young adult) shared that she was around 15 years old at the time. She shared that Santhouse asked her to take a walk alone in the woods which made her uncomfortable.

The investigation has confirmed that neither the young teen involved, the advocate mentioned, or the Forge Harbour youth were identified or interviewed by MAF at the time. Moreover, at the time, questions were not asked of the pilots' wives nor other MAF staff who were present at the Aviation Camp. Further, at the time, no documentation was made of the event or the "serious" concern. There was no update or feedback given to the pilots who had raised the concern. There were also no subsequent changes or boundaries put in place related to Santhouse's work with TCK youth.

After this incident, Santhouse continued meeting with Forge Harbour teens, including by meeting one-on-one with an 18-year-old female in July. In August 2016, Santhouse also attended a weeklong debrief with a missionary family that included his supervisor. Two female young adults (18 and 19 years old) accompanied Santhouse and his supervisor as babysitters. In hindsight, one event stood out to his former supervisor. During that week, his supervisor learned that Santhouse had been out into the early hours of the morning with the two young women in the woods. While both young women said nothing happened, his supervisor discussed the matter with Santhouse. She told him that it was not appropriate for him, as a married adult, to be with these young women so late at night. He excused his behavior as just looking at the stars.

No significant changes or safeguards were put in place related to Santhouse's interactions with young women of the Forge Harbour program after this incident.

### 3. *Fall 2016-2018: Santhouse's Sexual Misconduct of First Young Woman*

As fall 2016 emerged, Santhouse began a weekly small group for youth. He also began his own internship program with two young women who had just turned 18 and 19. His supervisor was aware of the internships, but no formal volunteer or internship paperwork was required, nor was there any oversight on the internships.

The investigation has confirmed that in the fall of 2016, Santhouse began his sexual misconduct with a young woman who was a part of the Forge Harbour program. After learning sensitive emotional and psychological issues through one-on-one life coaching, Santhouse progressed the interactions to physical contact and then sexual contact. The sexual contact occurred in his silver 2003 Volkswagen Jetta with tinted windows during the day in various locations around Boise and Meridian including in parks, parking lots, homes under construction, and also Santhouse's house when his wife and kids were asleep or not there. Santhouse would arrange the meetings via his personal email or his WhatsApp account.

Santhouse's progression of sexual acts included: (a) directing the young woman to touch his penis over his pants, (b) then having her touch his penis over his underwear, and (c) then taking out his penis and having her touch it. Santhouse also fondled and groped the young woman. Santhouse also engaged in other sexual acts (not including sexual intercourse) and used a sexual novelty item on various occasions. The young woman recalled Santhouse having a washcloth towel in his car that he used to clean up, suggesting pre-planning.

This misconduct continued throughout 2017 at a time when the young woman had just turned 19. By comparison, Santhouse was a 29-year-old married man with three daughters.

During his misconduct, Santhouse would ask the young woman if she "watched pornography" and shared that he had "seen a lot of pornography in his life." Santhouse also told the young woman during one of his acts, "at least you are 18."

Early on in their interactions at the time, Santhouse sent the young woman a personality test and asked her to take it, which she willingly did. Later, likely in 2018, after his sexual misconduct had begun, he told the young woman that he knew "based on her personality type that she would be adventurous regarding sex."

Santhouse would refer to them as "besties" and called himself "shadow fox" because he was sneaky and could come up with excuses to leave work to engage in sexual acts. He also used code words for sexual conduct such as the terms: "fun" and "distraction." For example, in one email he sent he stated, "I want you to like me. And so for me, it is amazing to have you living here for a while, because there are so many more opportunities for fun." He would also refer to what was done in his car as "Jetapy" meaning Jetta therapy.

As Santhouse was engaged in sexual misconduct of this young woman, he emotionally manipulated her to exercise control. For example, his communications with the young woman from winter through summer 2017 included him candidly expressing sentiments such as:

- “I love you. I can’t wait to see you tomorrow. And you #should write. Because I want to know what you think. I don’t care if it’s dark. I want to know you. Love, Jonathan.”
- “I’m sorry for moving around your clothing today . . . I love you, and I love knowing you, and the more I know you, the more I want to know you.” This was in relation to Santhouse taking off the young woman’s bra and groping her.
- “I want another hug. Like a really long one. I love you.” Later in email he says, “I love spending time with you. And I love all of our #jetapy, and hugging, and talking and texting and everything. I love you so much. I think I might just leave the office now and come to give you a hug. Because I really want one. I love you.”
- “I just think about you all the time . . . I miss you. Love, Jonathan.”

Santhouse’s email communications with the young woman from late summer 2017 through winter 2018 continued the candid expression of his desires:

- “I love seeing your smiling face. And your hair. And your eyes ... I am excited to see you tonight. Love, Jonathan.”
- “I dreamed that I got to sleep in the room with you.”
- “I want to be with you. I want to know you still want it. I want you to want me to know you. I want to know you. Love, Jonathan.”
- “I’m totally infatuated . . . You fit perfectly in my heart. Love, Jonathan.”

Santhouse also referenced his duplicity and state of mind in some of his emails. For example, in June 2017 he referred to wearing a “mask” around his family. He also commented, “the ‘I don’t give a fuck’ side of me that seems to be growing in dimension.” Further, Santhouse noted, “I know I appear all put together to people, but it is starting to feel like a big facade . . . .”

The young woman has confirmed that Santhouse never expressed remorse for what he was doing to the young woman in her vulnerable state. Instead, as the young woman expressed shame or guilt, Santhouse would say, “it is never going to happen again” only to continue in his actions. Santhouse would also tell the young woman that because she was in such a dark place it was hard to work with her and he “needed something for himself from her.”

#### *4. 2018-2020: Santhouse Begins Grooming and Sexual Misconduct Toward Second Young Woman While Continuing Sexual Misconduct Toward First Young Woman*

In early 2018, Santhouse began interacting with the second young woman in her early twenties. Like the first young woman, this young woman also met Santhouse through MAF’s Forge Harbour



program and was also in an emotionally and psychologically vulnerable state.

Early on in their relationship, Santhouse dissuaded the second young woman from following her personal boundaries. After Santhouse invited the young woman out for coffee, the woman responded that she had a personal policy to not spend one-on-one time with married men. Santhouse talked her into doing so anyway, arguing that he met with adult women one-on-one all the time, like his supervisor who was a woman, and that “it was fine.” He also told her that his wife thought such a rule did not make sense and reassured the woman that he was “more progressive” and wanted to empower more women in leadership in ministry. He was adamant that “it was close minded for people to think that men and women can’t be friends.” The young woman recalled being told by Santhouse’s wife that she was fine with Santhouse meeting one-on-one with the young woman since she had a lot of trust in their relationship and was not threatened by his interactions with women. To be clear, the investigation found no evidence that Santhouse’s wife had knowledge of his sexual misconduct while it was taking place.

Not only did Santhouse break down her personal boundaries, but he also moved early on to evade detection in their communications by moving emails from his MAF email account to his personal email account. A spring 2018 email made clear Santhouse’s intentions with moving communications to his personal email, stating: “I know MAF doesn’t read our email . . . but still . . . gmail seems safer to talk about life stuff.”

Santhouse then continued with his grooming behavior that included compliments and expressions of “love.” In a pattern previously exhibited with his first victim, Santhouse took steps to be a listening and supportive ear where he learned highly sensitive personal information that he used to coerce and manipulate the young woman into sexual acts.

As with the first young woman, Santhouse’s interactions quickly moved to the physical. At first, normal side hugs began to last longer. Santhouse would try to justify his behavior as if it was fine saying he “wouldn’t hug another woman that long except for his wife or sisters.” He would then offer reassurance, “I want you to feel comfortable and safe.” For the second young woman, when doubt arose about Santhouse, she would think that people she trusts, trust him.

As Santhouse’s conduct continued, he would find times when no one was around, and he would start giving a hug and then move his hands toward her breasts and would press in with pressure directly onto the sides of her breasts. The young woman felt bad and ashamed and would shut down.

In October 2018, Santhouse escalated his actions to sexual misconduct. On a Saturday morning in October 2018, the young woman was helping Santhouse at MAF’s HQ in preparation for a hike. With no one at HQ, Santhouse hugged the young woman and ran his hands along her sides near her chest. Likely noticing her discomfort, he told her he “wasn’t trying to touch her chest, but if he wanted to, he would just grab a handful.” He then proceeded to grope her breasts. Shocked, the young woman did not tell anyone about this at the time. At that point, she thought she would be blamed for it if she reported it. She also didn’t know who to report it to. She wondered if Santhouse’s supervisor would have believed her since the supervisor seemed to have such a good relationship of trust with Santhouse. The young woman also saw Santhouse’s supervisor as burnt out and checked out. Desperate for relationship and isolated, the young woman set the incident aside and continued interacting with Santhouse.

Santhouse then proceeded to engage in increasingly egregious sexual misconduct. Santhouse would tickle her when she was sharing difficult things in her life. He would say she “was being too serious” and then tickle her. She said that Santhouse would stick his hand up or down her shirt touching her breasts directly, sometimes removing her bra. When he grabbed her breasts, it was painful. When she would try to lower her body so he couldn’t touch her, he would get rougher with her and leave bruises on her arms and forearms. There were times when he would tickle her and she would struggle with him. At times, she felt like her arm would break.

Santhouse’s progression continued from tickling her through her clothes to her clothes coming off and other sexual activity (not including sexual intercourse). From January 2019 through March 2019 when Santhouse left MAF and continuing through 2020, Santhouse engaged in very similar sexually abusive conduct that he had with the first young woman. The young woman said it made her feel “disgusting and violated.”

As with the first young woman, Santhouse used code words to describe what he was doing, calling it “parking lot ninja” or “PLN.” According to the second young woman, Santhouse was good at sandwiching these events between normal events. Further, his conduct was confusing to the second young woman since she really wanted a friend and her desire for friendship was met with unwanted sexual conduct by Santhouse.

Santhouse used an arsenal of psychological tools to get the second young woman to do what he wanted sexually. He used coercion and sensitive past events that the second young woman had shared with him to manipulate her into engaging in sexual conduct. His coercion included asking over-and-over again for the second young woman to do sexual things for him. He would continuously pressure her by saying things such as “just try it” and “I really want you to” and “I have been thinking about you doing this.” On multiple occasions, the young woman was in her car so she felt that she could not leave and did not feel like she could say no to his sexual demands. When coercion would not work, he would try to make her feel sorry for him and use guilt by saying how “depressed” he was and how “this helped him.” He would say “I know it’s wrong, but it feels so good.” If that did not provide the response he wanted, Santhouse would shift tactics to shame and tease the young woman by comparing her with other young women. He would say “you don’t want to be like” in reference to another young woman. For example, one time, Santhouse asked the young woman, “don’t you want to know where I’m ticklish?” He said to touch his penis and then shamed her when she was visibly uncomfortable.

Santhouse would also emotionally coerce the young woman by threatening to end their relationship, saying, “if you don’t do these things, we will have to stop talking.” He would make it clear he “didn’t want to lose their friendship.” “We’ve built so much trust” he would say and then would remind her that “we can’t have a relationship anymore” if there wasn’t sexual contact. Santhouse also used the second young woman’s past trauma against her to isolate her from community. For example, one day in 2019, Santhouse informed the second young woman that since “she was abused as a child” she couldn’t be around his family and daughters. The second young woman had shared with Santhouse that she was physically abused when she was a teen. Santhouse used this past trauma to isolate this young woman from community. His actions also removed accountability by cutting off communication between the young woman and Santhouse’s wife so that the young woman could not expose his sexual misconduct.

In summary, Santhouse engaged in sexual misconduct toward the second young woman in his



home, cars parked at different parks in Nampa and Boise (Lakeview Park, Optimist Park, Kristen Armstrong Park, Mallard Park by Lake Lowell), shopping center parking lots, a parking lot near the Impact Dance Center where his daughters took dance lesson, the municipal airport, homes under construction near his home, and at MAF HQ.

Santhouse was engaging in sexual acts with both young women the entirety of 2019 and after he left MAF in March 2019. His acts continued while working for a regional airline. After he left MAF he would meet with the second young woman and say that she “needed to trust him more and they should do more now that he was no longer at MAF.”

Santhouse continued to engage in sexual misconduct with both young women (without either of them knowing what was happening to the other) throughout 2020.

Santhouse attempted to avoid detection, by instructing the deletion of any WhatsApp communication between them. While some communications were deleted in the spring of 2020, one of the young women remembers some of the deleted texts. The content included what Santhouse told the young woman he wanted to do sexually. He also asked her to meet him “without a bra on” since it “was easier for” him that way.

#### *5. Spring 2020-fall 2021: The Women Cease Interacting with Santhouse and Report His Sexual Misconduct*

In the spring of 2020, the second young woman began to refuse his further sexual demands. Yet, he persisted in contacting her throughout the fall of 2020 all the way through the end of November 2021 in an effort to meet and restart sexual contact. As the second young woman gained awareness of the coercion and emotional manipulation, she knew that it had to stop and told him this in January 2021.

The last time the first young woman saw Santhouse in person was the fall of 2020. At that time, while the young woman was struggling emotionally, Santhouse came to her home. Rather than help her, he started putting his hand up her shirt. When this exposed evidence of self-harm, he ignored it saying, “I’m not worried about it.” He then proceeded to have her perform a sex act on him, used her kitchen rag to clean up, and got up and left.

Finally in May of 2021, the first young woman, having reflected on what she considered a toxic relationship that arose out of her vulnerability, grew angry and called Santhouse to tell him what he had done to her. She told him, “all the stuff that happened, the balance of power was not equal. You were so much older. I was vulnerable.” Santhouse failed to acknowledge what he had done and instead callously told her that “we shouldn’t talk anymore.”

#### *6. The Deep Impact of Santhouse’s Sexual Misconduct*

During the spring and early fall of 2021—before anyone had made a public complaint about Santhouse—the first young woman who Santhouse had been abusing since the fall of 2016 wrote in her personal journal on the impact of Santhouse’s misconduct. The writings make clear the level of manipulation, control, and pain Santhouse had caused.

In one entry, the young woman noted, “he was supposed to be mentoring me and coaching me, he wasn’t supposed to take advantage of the fact that . . . I was desperately lonely. He said if I ever told anyone I would ruin his life, and maybe that’s true. But does he care that he fucked up my life?”

In another journal entry, the young woman painfully remembered, “Jonathan did things and I want to disappear and not remember. But he did things when I was a fucking 19 year old skeleton so I guess it doesn’t matter what I look like.” In a plea for justice she expresses, “I hope he might see that I am sick some day and he will know it is his fault and he will feel bad instead of getting to live his perfect life in ignorance and bliss.” She continued, “I won’t trust anyone anymore. Not after Jonathan. I am inside a prison.”

#### *7. November 2021: Reporting Santhouse’s Sexual Misconduct*

In November 2021, the second young woman approached MAF staff to inform them that Santhouse had sexually assaulted her when he was still working at MAF. From that point forward, MAF staff conducted its own initial internal investigation into the matter while assisting the young woman in speaking with law enforcement.

In the course of the internal investigation by MAF, the first young woman was identified and contacted in late December 2021. While the first young woman expected to never talk to anyone about what had happened to her, when approached, she realized there was another victim and she was not alone. The thought that Santhouse continued engaging in sexual misconduct with someone else was motivation to share her story. The first young woman then began cooperating with MAF’s internal investigation and with law enforcement. In early February 2022, MAF retained C+H as investigators to conduct a separate investigation.

#### *8. Refusal to Meet, Hiring of Lawyer, and Confession to Wife*

In the course of the investigation, Santhouse was contacted by the Investigators. After Santhouse agreed to meet on April 12, 2022, the Investigators flew to Boise on April 11, 2022. At the close of business on April 11, 2022, the day before he was to be interviewed, Santhouse emailed the Investigators canceling the interview. In a dismissive manner he stated, “I now have an attorney, and I will not be meeting with you tomorrow. If you want to discuss these allegations of misconduct, you will need to speak to my attorney. Let me know if you want her contact information, otherwise, I will consider this closed.”

The Investigators then sought Santhouse’s attorney’s name and, while still in Boise, attempted to meet with Santhouse and his attorney. Despite repeated requests to meet, the attorney and Santhouse refused to meet with the Investigators.

Shortly thereafter on April 13, 2022, MAF released interim findings to the MAF community. Upon learning of the investigation, Santhouse’s wife spoke with Investigators accompanied by her pastor and his wife. Mrs. Santhouse confirmed that Santhouse had confessed to her in writing of what he termed “affairs,” but declined to provide a copy of the written confession. When it became clear that information would not be forthcoming, the Investigators ended the interview but asked Mrs. Santhouse to reach back out if she reconsidered. To date, the Investigators have not been contacted by the Santhouses.

The investigation has concluded that Mr. Santhouse used his position as a coach and mentor to learn highly sensitive private information which he used to manipulate, shame, and coerce the women into engaging in sexual acts with him. The investigation also revealed that Mr. Santhouse engaged in efforts to evade detection by shifting communications with the victims from his MAF email to his personal email and instructing them to delete communications.

#### B. No Additional Victims Have Been Found, But Santhouse Engaged In What Could Be Seen as Grooming Behavior with Other Young Women

The second area of inquiry in this investigation was to determine if there were other victims of Santhouse's sexual misconduct. To date, the investigation has not identified additional women disclosing sexual misconduct by Santhouse. However, the investigation did uncover that Santhouse engaged in additional activity directed at other young women that could be seen as grooming behavior. Specifically, the investigation has confirmed that after Santhouse left MAF in March 2019 he continued to contact 9 young women who he had met through MAF's Forge Harbour program. With two of these young women, Santhouse offered to meet in person during layovers while he was flying for a regional airline.

During the investigation, C+H Investigators identified 14 additional young women who were affiliated with the Forge Harbour program or MAF, ranging from ages 18 to late 20's. The young women were interviewed and shared that they had not been subject to sexual misconduct by Santhouse. Their experiences with Santhouse varied from the positive to the uncomfortable.

Some interactions stood out as particularly concerning in light of Santhouse's past conduct. For example, one young woman disclosed that when she was 15 she attended an Aviation Camp and Santhouse asked her to take a walk alone in the woods. This made her uncomfortable and she thus declined. On the way back from camp, she flew with Santhouse, and he singled her out to be his co-pilot. She felt it "was a little fishy" so she said no. This same young woman shared that years later, when she was home talking with other girls, one of the other girls that had attended the Aviation Camp noted that "something didn't seem quite right" about Santhouse. Interactions with him "felt odd."

Another young woman in her early 20's noted that Santhouse reached out to her directly after she graduated from high school and was back in Nampa before going to college the summer of 2017. Santhouse got her cell number and reached out to her directly to meet for coffee. She recalled that he wanted to talk about what he did and then quickly transitioned to wanting to talk about her feelings. She did not feel comfortable talking about her feelings since she didn't know him and told him as much. Later that summer, she attended an event at Santhouse's home, and he asked her to "draw her feelings" during a coaching session. The young woman stopped participating in Santhouse's events and deleted WhatsApp to no longer get messages from him in 2017. The young woman went away to college, yet Santhouse started emailing her in 2018. He emailed her in 2019 and again in 2020. She therefore created an automatic rule to delete his email messages. Yet, again, Santhouse emailed her in 2022, which was shocking to her.

Another young woman in her 20's noted that, when she was 18 or 19, she interacted with Santhouse quite often and formed a relationship of trust with him. She now sees how much she overshared. She noted that Santhouse would complain about giving side hugs and expressed frustration that he had to meet in a public place with windows. He would note that people were "too

conservative.” He would tell this young woman that women were part of ministry and thus people should not be trying to hold them back by being concerned about his meeting with young women. She noted that Santhouse would often make an excuse for why his wife was not around. He would affirm this young woman letting her know “I appreciate you” and “I love you.”

Another young woman who participated in Forge Harbour when she was 14 to 15 years old said that Santhouse direct messaged her in response to an Instagram post about her 18<sup>th</sup> birthday. Santhouse asked about her future plans and told her that he flew “all over the US, and if I’m ever nearby I’d totally get you Dutch Bros :)” (referencing the coffee chain).

An 18-year-old young woman noted that when she was in 7<sup>th</sup> or 8<sup>th</sup> grade, Santhouse took her to a one-on-one meeting at a fast-food restaurant. She felt awkward because he was a grown, married man, but she thought maybe it was part of his job working with missionary kids. Santhouse made it obvious he wanted to keep talking further with her, but the young girl was shy at the time and didn’t say much. When this young woman went home, she told her parents and they let her know that they did not know that Santhouse had taken her out to eat and talk. Her parents said that this conduct was not okay and reached out directly to Santhouse. She reported that after that his interactions were much less intentional.

Based on Santhouse’s past conduct, modus operandi, and the testimony of these young women, it is reasonable to suspect that Santhouse was grooming other young women.

### C. MAF’s Gaps in Process, Supervision, and Training

The investigation found consistent themes related to MAF’s organizational culture at the time that Santhouse engaged in misconduct. First, it became apparent that the supervisors in Human Resources and Member Care failed to ensure policies were executed consistently and processes were put in place to effectuate policies on sexual abuse and harassment. Moreover, the investigation uncovered that while MAF had gone through significant efforts from 2004-2008 to focus on proactive prevention of child abuse including through the creation of policies, manuals, and trainings, the efforts waned into complacency by the time Santhouse worked in MAF’s headquarters in 2015-2019.

It also became apparent that MAF’s headquarters teams contained two different professional experiences. On the administrative side relating to Human Resources and Member Care, it appears that some aspects were handled professionally (onboarding, payroll, benefits, debriefing, and emotional support), while other issues like safety and accountability concerning women and youth were not handled with the same level of attention. Finally, in the realm of Human Resources and Member Care, there were deficits in supervision and accountability. As one former supervisor noted, MAF sometimes suffers from “excessive professional courtesy” where grace is overly extended.

Beyond these themes relating to organizational culture, the investigation uncovered five main areas where MAF exhibited organization gaps that were exploited by Santhouse.

#### 1. *Santhouse’s Disclosed Pornography Problem Was Not Accounted For in Placing Him in Charge of the TCK Youth Program*

The investigation determined that Santhouse’s supervisor was aware of his past problem with

pornography. Specifically, Santhouse's supervisor told investigators that she and her husband were aware of the issue and that her husband would check in with Santhouse about it at times. Santhouse's pornography issue was not accounted for in limiting Santhouse's interactions with young women in the TCK Youth Program.

Given the prevalence of pornography in society, it is unlikely that MAF or any missionary organization will be able to find missionaries who have not been exposed to pornography. However, individual circumstances in coping with the problem of pornography exposure will vary widely. Not every individual who is exposed to pornography will develop a problem or addiction. However, many individuals will, and such pornography problems and addictions can give rise to more harmful conduct including criminal conduct such as sexual abuse or child exploitation.

Given the experience with Santhouse, MAF should consider making disclosure of pornography an alert that is used to assess accountability and safeguard standards for the individual depending on his expected role. Also, MAF should consider implementing processes to help ensure that these accountability and safeguard standards are being met on an ongoing basis.

2. *Santhouse's Supervisor Overly Trusted Santhouse and Did Not Adhere to Established Preventative Guidelines and Policies or Implement Sufficient Safeguards and Accountability Measures Related to Santhouse's Interactions with Young Women through the Forge Harbour Program*

From at least 2004 through 2019, MAF and the Member Care team has had stated proactive policy positions related to youth safety, prevention, and accountability. As noted below, these guidelines and policies were overlooked and not prioritized by Santhouse's supervisor.

a. Established Preventative Abuse Guidelines and Policies

Beginning in 2004, after heightened concern about sexual abuse in missionary and faith-based organizations (including within MAF related to one of MAF's former founders, Jim Truxton), MAF created its Child Sexual Abuse Policy. The Sexual Abuse Policy declared that "[t]he motive for this policy is to take a proactive stance toward the protection of MAF children, as well as the children of families with whom we minister, and the families with children to whom we minister."

Continuing a focus on child safety into 2006, MAF became a "founding member" of the Child Protection Safety Network, a network of 13 mission/church organizations that sought best practice training on dealing with sexual abuse. This led, in 2008, to the development of MAF's Policy Manual on Child Abuse ("Manual"). The Manual consists of over a hundred pages and relates to abuse of children (17 years or younger) encompassing sexual, physical, emotional, and neglect. The Manual includes MAF's philosophy, policy, definitions of terms, reporting requirements, procedures for investigations, and templates for investigation interviews and action plans. MAF's Manual includes reference to a "Best Practice Standards" document prepared by a Task Force of missionary organization in 2008. Of note, a key best practice is prevention.

In 2011, MAF's Director of Member Care (and Santhouse's supervisor) prepared a Member Care Vision and Purpose Statement that stated the purpose of Member Care was to "provide vigilance, initiative and response for the nurture, transformation and fulfillment of MAF staff and families." In

keeping with this purpose, the goals of Member Care were to “encourage organizational culture so that policies and practices increase personal effectiveness and safety” and “create strategies for preventative/pro-active care in the realm of member health (Marriage, parent/child, accountability, boundaries, interpersonal skills, etc.).”

As of November 2018, MAF has had a Standards of Conduct that contains specific language on “inappropriate use of power” which includes physical abuse, sexual abuse, harassment and discrimination, and spiritual abuse. It includes a specific section on the “Protection of Children and Other Vulnerable Groups” which requires MAF staff to “create and maintain an environment which prevents sexual exploitation and abuse. Managers are (sic) all levels have a particular responsibility to support and develop systems which maintain this environment.”

b. Guidelines and Policies Overlooked and Safeguards Not Set Up

Despite the established guidelines and policies noted above, the investigation did not reveal any effective strategies or practices in place in Member Care from 2016-2019 (when Santhouse was working there) in relation to the prevention of sexual exploitation of youth or women by MAF staff or others associated with MAF. In particular, leadership in Member Care did not implement preventative strategies on accountability and setting boundaries related to the Forge Harbour TCK Youth program that was run through Member Care aside from ad hoc recommendations to keep things in public view.

Particularly, no accountability measures were put in place on Santhouse in working with youth and young women, despite his supervisor knowing of his struggle with pornography. Instead, Santhouse was allowed to work freely on a one-on-one basis with young women that were a part of the Forge Harbour program with very limited oversight by his supervisor. Santhouse was also entrusted with hosting young women of the Forge Harbour program in his home (with his wife and kids) for periods of time without any protocols or oversight.

c. Lack of Accountability Measures

From 2016-2019, during the entire time that Santhouse was working in Member Care with the Forge Harbour program for TCK youth, his supervisor met with him regularly, but did not conduct any performance reviews.

The lack of performance reviews of Santhouse contradicted the Staff Handbook in effect at the time that required performance reviews. Santhouse’s supervisor’s job description also provided that “supervisory functions” of being the Director of Member Care included providing: (1) “accountability to staff, volunteers . . . under direct supervision”; and “(2) prepar[ing] and conduct[ing] annual performance reviews . . . with each employee under direct supervision.” This was not done by Santhouse’s supervisor, nor was it done consistently at MAF HQ.

Organization-wide, from 2015-2019, due to push back from staff and lack of follow through from supervisors, there was low participation in providing performance review of staff at MAF. Neither the Director of HR nor the Director of Member Care conducted performance reviews of their direct reports from 2015-2021. Even when performance reviews were provided, as in the case of the VP of HR toward the Director of Member Care, the reviews for multiple years were often cut and paste reviews from past performance reviews.



The lack of oversight and review likely emboldened Santhouse, whereas a more rigorous culture of oversight and accountability would likely have served as a deterrent. The lack of oversight and accountability is also indicative of a high-trust, family-oriented, and hands-off environment. Santhouse exploited this environment to prey upon his victims. As his former supervisor has stated, her “love and affection for the Santhouses clouded my ability to see risks.” She admits that it “was naïve to try and build Forge Harbour without safeguards.”

3. *Santhouse’s Supervisor and Human Resources Leadership at MAF Did Not Thoroughly Investigate, Document, or Adopt Safeguards In Response to Two Concerns Raised by MAF Staff About Santhouse’s Public Interactions With Young Women*

a. July 2016: Concern about Aviation Camp Conduct Raised by Pilots

As noted above, in July 2016, two MAF pilots shared a concern about Santhouse’s conduct at Aviation Camp with his supervisor at the time. Specifically, the concern related to his actions at a camp with a teen girl and young woman. After the camp, the pilots approached Santhouse’s supervisor, the former Director of Member Care. During this meeting, the pilots shared their concern as well as having seen Santhouse sitting for a long period of time at a picnic table at the MAF campus with a young woman from the Forge Harbour program. To one of the pilots, the interaction at the MAF campus exhibited a lack of discretion by Santhouse, and he thought that it was not appropriate for Santhouse to be meeting for a long period of time one-on-one with a single young girl. It felt “off.”

The question arises, given the allegation received at the time, what was the supervisor or the VP of HR (if he knew of the concern) expected to have done? At the time in 2016, the operative MAF policy or guidance would have come from the Staff Handbook or the Manual (defined above). The Standards of Conduct had not yet been developed in 2016.

The harassment section of the Staff Handbook applies “equally to employees, volunteers, customers, visitors, Temporary workers, and vendors.” It defines harassment as “unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.” In looking at the concern raised, it does not appear to amount to an allegation of harassment so involvement of HR would not have necessarily been required.

The other guiding protocol would have been the Manual, which was meant to serve as “a tool to understand Mission Aviation Fellowship’s Child Abuse Policy, as well as an overview of the procedures that will be followed when abuse allegations occur.”

The concern raised to the Director of Member Care (and potentially to the former VP of HR) was not about child abuse, but it did relate indirectly to the safety and security of the teen girl at the Camp. As such, one could argue that the Manual could have served as a guiding tool in dealing with the concern. If so, the Manual lays out a specific investigative procedure, which would have included as an initial step notification to the Director of Personnel or Member Care followed by a preliminary report and additional process and investigation as warranted.

The investigation has confirmed that the actions set forth in the Manual were not taken in relation to the concern at the Aviation Camp. Further, neither Santhouse’s supervisor nor the former VP of HR took other actions aside from telling Santhouse that the interactions were inappropriate and

advising him to keep his interactions with members of the opposite sex out in the open. Neither the young teen involved, the advocate mentioned, or the Forge Harbour youth were identified or interviewed by MAF at the time. Moreover, at the time, questions were not asked of the pilots' wives nor other MAF staff that were present at the Aviation Camp. Further, at the time, no documentation was made of the event or the "serious" concern. There was no update or feedback given to the pilots who had raised the concern. There were also no subsequent changes or boundaries put in place, at the time, related to Santhouse's work with TCK youth. It also appears that in responding to these incidents Santhouse's supervisor failed to appropriately consider the age disparity between Santhouse and the young females as well as the imbalance of power resulting from his position and role within MAF.

b. Late 2017/Early 2018: Concern by Former VP of Advancement

In late 2017 or early 2018, the former VP of Advancement for MAF went to Santhouse's supervisor (former Director of Member Care) with a concern. According to the former VP of Advancement, at the time, there was an unwritten understanding at MAF about being careful with male/female interactions. She had been seeing Santhouse spending a lot of time taking walks with a young adult woman that was affiliated with the Forge Harbour program and, in her view, the interactions were bordering on inappropriate. The former VP's recollection was that Santhouse's supervisor was surprised and said she would have a male colleague of Santhouse's in Member Care talk to Santhouse. That seemed odd to the VP of Advancement since the male colleague was not Santhouse's supervisor.

The former VP of Advancement said that a few days later this male colleague talked to her before speaking with Santhouse. She does not remember the conversation and assumes it was to hear her concerns directly from her.

Santhouse's former supervisor confirms that the former VP of Advancement talked to her about how much time Santhouse was spending with the young woman. She remembers telling the VP the work-related reason for the interactions between Santhouse and the young woman. Santhouse's supervisor remembers talking to Santhouse and discussing boundaries and the optics of his interactions with women. She disputes that she would have had Santhouse's male colleague talk to Santhouse in place of her. What is confirmed is that Santhouse's male colleague did speak with Santhouse.

This male colleague confirmed that he had a discussion with the former VP of Advancement who raised a concern of seeing Santhouse walking with a young woman affiliated with the Forge Harbour TCK program and asked if it was appropriate. The male colleague confirmed that he did speak with Santhouse. He noted that when he raised the concern, Santhouse was upset and defensive. Santhouse said, "why don't these people come to me if they have a concern?" He also asked Santhouse where he and the young women went and what they did and Santhouse said they would go to a coffee shop and do planning for the Forge Harbour TCK program. The male colleague also asked Santhouse if there was anything going on between him and the young woman and Santhouse denied any inappropriate involvement.

According to Santhouse's former supervisor, the former VP of HR also was aware of the concern raised by the former VP of Advancement. She remembers that the former VP of HR approached her to share the concern that was raised. The former VP of HR does not remember this nor does he remember having a conversation with Santhouse about this second concern. He also attests that if it had happened



he would have remembered it.

When asked why this second concern did not trigger further action, Santhouse's former supervisor stated that, at this point, she (the former supervisor) was coming out of a legalistic framework where men and women could not work together. Thus, she saw the benefit of male and female working relationships. She also knew the former VP of Advancement had brought up other divisive issues and she marginalized the concern based on the messenger.

The former VP of Advancement noted that she would have expected Santhouse's supervisor to put a plan together and document the issue. Further, the former VP of Advancement shared that since Santhouse's supervisor was the Director of Member Care and Santhouse was in Member Care, she expected that protocols were being followed.

The investigation has confirmed that multiple staff at MAF (his supervisor, the former VP of HR, and Santhouse's male colleague in Member Care) did address the concern with Santhouse. However, there was no protocol followed in handling this concern. Moreover, neither Santhouse's supervisor, the former VP of HR, the former VP of Advancement, nor Santhouse's male colleague in Member Care, spoke with the young woman in question. Neither was the issue documented or taken into consideration given the prior concerns raised about Santhouse. Moreover, the former VP of Advancement never heard back from Santhouse's supervisor nor followed up on the issue herself. There were also no subsequent changes or boundaries put in place, at the time, related to Santhouse's work with TCK youth.

4. *MAF Leadership in Human Resources and Member Care Did Not Implement an Existing Manual on Sexual Abuse, Know or Abide by a Mandatory Reporting Requirement, or Execute Consistent Process for Documentation and Investigation of Abuse and Harassment Concerns*

a. Policies

As noted above, in 2008 MAF created a Manual on Child Sexual Abuse that contained extensive reporting requirements, procedures for investigations, and templates for investigation interviews and action plans. During the investigation, it has become clear that leadership and staff at MAF did not know that this Manual even existed. Moreover, the leadership of Human Resources and Member Care (those who would implement the Manual) have provided conflicting views on whether the Manual is still operational and guiding or "has been shelved" since 2011. As the only detailed and written protocol on: (a) mandatory reporting requirements; (b) how to document concerns; (c) the steps and team required for an investigation; and (d) best practices for preventative measures, it could have served as a helpful guiding tool in dealing with concerns about Santhouse's interaction with young females from 2016-2018.

b. Mandatory Reporting

The Manual states that the "State of Idaho adheres to a 'Universal Reporting Statute. This statute requires anyone in the state who know of or suspects child abuse to report the same to the appropriate authorities. The statutes requires an immediate phone report, followed by a written report within 48 hours, to the 'proper law enforcement agency or department."

Despite this provision in the Manual, the investigation has revealed that neither MAF's VP of HR nor its Director of HR had any knowledge of MAF's universal mandatory reporter requirement in Idaho until the investigation began. Moreover, it has been confirmed that there is no training by HR or Member Care of staff on the mandatory reporter requirement.

While the mandatory reporter requirement (related to child abuse) was not triggered by Santhouse's conduct with adult young women that were a part of the Forge Harbour program, it became apparent during the investigation that on at least one occasion the lack of knowledge of the mandatory reporter requirement by certain leadership led to a lack of reporting to authorities of an issue that should have been reported. Specifically, one young woman that was part of Forge Harbour as a teen disclosed to Santhouse and his supervisor that when she was underage she was abused by another teen (completely unrelated to MAF). It does not appear that either reported the issue to authorities and instead reported the issue to the teen's parents. Despite having the Manual making the mandatory reporter requirement known, the former supervisor was unaware that she was a mandatory reporter. The lack of knowledge about the mandatory reporter requirement is a gap that needs to be addressed.

c. Documentation and Investigation

As noted above, MAF's Child Abuse Policy Manual lays specific action, documentation, and investigation steps in handling abuse allegations. In interviewing HR and Member Care personnel, it became clear that this process is no longer known, followed, or even referred to in handling concerns related to child abuse/neglect that have been raised to HR and Member Care. Moreover, it has become clear that there is no written process for handling reported concerns on sexual harassment. Moreover, there is no written protocol on when a sexual harassment concern triggers an investigation or how to conduct an investigation in the harassment setting. Instead, the HR and Member Care personnel have engaged in an ad hoc approach to issues that has been inconsistent, has not produced sufficient documentation and disclosure, and has failed to result in appropriately thorough interviews of the complaining party and any related personnel. This is another significant gap that should be addressed.

5. *MAF Currently Lacks Key Guidelines for the TCK Youth Program, Abuse and Harassment Training, and Accessible Reporting Channels for Concerns Related to Abuse or Harassment*

a. Policies Related to Forge Harbour TCK Youth and House Placement

Until this investigation, MAF had not prepared written guidelines related to the safety of youth participating in Forge Harbour programs. Moreover, given the family-based dynamic of missionary organizations like MAF, it is not uncommon for children and young adults to be temporarily living with unrelated MAF staff for periods of time due to furlough or summer visits. However, MAF has no protocols or safeguards in place on MK teens or young adults for these situations that would protect young people from being abused. At a minimum, strict requirements, accountability, and scheduled auditing needs to be put in place that would include checking in with the host and young person to ensure the youth's safety.

## b. Training

Training of staff on child abuse and workplace sexual harassment policies and processes in place is an essential component to an effective compliance program to prevent and deter abuse and harassment. The investigation determined, however, that the training of MAF staff on MAF such policies and manuals appears to be non-existent.

First, regarding career missionaries, from 2015 (when Santhouse began work at MAF Headquarters) to the present, there are no records showing in-person training for career missionaries like Santhouse on: (1) MAF's Harassment policy in the Staff Handbook; (2) Standards of Conduct; (3) Sexual Abuse Policy; (4) how/where to make a written report of child safety or harassment; or (5) how a report of child or adult abuse/harassment will be handled. As it relates to sexual harassment, until 2018, MAF's online sexual harassment training courses were not required for any career missionaries. In 2018, this changed and any new manager was required to take New Manager training courses that included "workplace harassment." However, existing career managers or non-manager career missionaries were not and have not been required to take workplace harassment training courses.

Regarding associate staff, records of presentations made by Human Resources in 2016 and 2017 and Member Care in 2016, 2017, and 2019 in the "Connections" course or in the "New Hire" training show that there has been no mention or training of MAF's Standards of Conduct, Harassment policy in the Staff Handbook, MAF's Sexual Abuse Policy, or how to report child or adult abuse or harassment. As for online training of associate staff, until 2018, online sexual harassment training courses were not required for any associate staff. In 2018, any new associate manager was required to take New Manager training courses that included "workplace harassment." However, existing associate managers or non-manager associate were not and have not been required to take workplace harassment training courses.

The investigation has confirmed that there is no training or information shared with volunteers, interns, advocates, babysitters, or TCK Forge Harbour students at MAF related to MAF's Code of Conduct, Harassment policy in the Staff Handbook, MAF's Sexual Abuse Policy, or how to report child or adult abuse or harassment.

All staff categories are bound by: the Staff Handbook, Standards of Conduct, Sexual Abuse Policy and (conceivably) the Policy Manual on Child Abuse. Given the lack of trainings on these key policies, it is unlikely that most MAF staff understand the policies.

## c. Reporting

Pivotal in stopping child abuse or sexual harassment in a missionary organization like MAF is a clear, accessible, and easily used reporting system. As discussed below, MAF's current reporting forms and processes are none of the above.

### i. Child Safety Reporting

In obtaining reports of child safety and abuse, MAF has a "Child Safety Report Form" ("Form") that was created October 2019. The Form did not exist the years Santhouse served as a Member Care Specialist and oversaw the Forge Harbour program for TCK youth. The VP of HR has confirmed that the

Form has *not* been communicated to staff. It also does not seem that, historically, volunteers, interns, MAF advocates, babysitters have been informed of the Form. As such, this Form is not widely known by staff at MAF. Additionally, even if a staff member knew of its existence, trying to access it would be highly problematic since it is found on MAF's intranet in a folder four levels deep from the home page. Further, while the Form says that the reports goes to the Chief Human Resource Officer and the Director of HR, in interviewing HR leadership it did not appear that they knew where the reports went and did not have a clear process (written or otherwise) to undertake if a report was made.

This lack of knowledge of the Child Safety Report Form, corresponding inaccessibility, and unclear collection of and process for dealing with reports, creates a gap in child abuse and safety that needs to be addressed by MAF.

ii. Sexual Harassment Reporting

There is no form or other way to submit a written report of sexual harassment or discrimination on MAF's staff intranet. The need for a well-known and accessible reporting structure was made even more clear by some of the interviews conducted with volunteers at MAF. At least two volunteers saw Santhouse interacting in a way with Forge Harbour teen girls that made them concerned about the familiarity and appropriateness of the interactions. Yet, none of these volunteers made a report to anyone at MAF. In part, they did not make reports because they did not know who to talk to or where to go. A regularly communicated and accessible reporting structure would alleviate this gap.

#### IV. RECOMMENDATIONS

In summary, our recommendations to MAF include:

- Caring for the victims by creating a Care Team to provide ongoing support and resources to the known victims and others who may come forward in the future.
- Establishing clear ownership of safety policies by appointing the VP of Safety & Quality to work, in collaboration with the People Group, to implement, administer, and be the point person for all safety policies and reporting issues related to MAF staff, volunteers, and youth involved in MAF programs and activities.
- Making disclosure of pornography an alert that is used to assess accountability and safeguard standards for the individual depending on his/her expected role. Also, MAF should consider implementing processes to help ensure that these accountability and safeguard standards are being met on an ongoing basis.
- Revamping or creating new policies and guidelines related to: (1) volunteer and intern safety; (2) the TCK youth program; (3) the Teen Aviation Camp; (4) safety protocols for youth related to on-campus housing and off-campus housing arrangements; (5) stricter accountability and guidelines for remote/off-campus work; and (6) requirements for use of electronic communication and social media via MAF approved channels.
- Strengthen understanding of and compliance with existing policies (such as Child Sexual Abuse Policy, Harassment Section of Handbook, Standards of Conduct, Code of Ethics) and manuals (Child Abuse Manual) by outlining, training, and enforcing best practices for all departments that work with children, teens, and young adults.
- Improving in-person training programs on sexual harassment and employee accountability while raising awareness of how MAF's high-trust family culture can lead to not asking or ignoring questions or concerns about potentially inappropriate conduct.
- Enhancing MAF's reporting procedures by placing child safety and sexual harassment reporting forms on the intranet home page and bolstering the understanding of an anonymous reporting structure with training and requiring the VP of Safety and Quality and/or an outside expert to investigate all reports of misconduct. All staff and volunteers must be made aware of the updated reporting channels.
- Critical to the above is implementing accountability for compliance with existing and new safety policies by conducting periodic audits by an outside investigation firm to ensure all of the above are being performed and providing reports with areas for improvement or changes.