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MEMORANDUM

TO: Jean Barbara, President of the Sword of the Spirit
David Mijares, Presiding Elder of the Servants of the Word

FROM: Kathryn M. Nash, Lathrop GPM

RE: Summary of Findings and Recommendations for Independent Child Safety Review

DATE: January 19, 2024

Scope and Methodology of Independent Review

In 2020, the International Executive Council and Servants of the Word engaged the law firm Lathrop GPM to conduct an independent review of Sword of the Spirit's and Servants of the Word's current child safety policies and procedures and its past responses to two child safety matters involving Ed Conlin and Jamie Treadwell. As part of our review of the organizations' past responses, we were asked to examine whether appropriate responsive action was taken in the matters involving Conlin and Treadwell. Lathrop GPM's ability to gather information relating to these two matters was delayed until the criminal case against Treadwell concluded.

The independent review included an examination of the organizations' child safety policies and procedures. In addition, we reviewed documents relating to the response to the matters involving Ed Conlin and Jamie Treadwell. These documents included email correspondence, communications, written statements, and other documentation that were created close in time to actual events.

As part of our review, we spoke with a number of individuals who were involved with the response or who otherwise had information relating to these two matters. Lathrop GPM reached out to the families of alleged victims when the family expressed interest in speaking with us as part of the review.

Our findings are based on the information we were able to gather through our examination of documents and interviews conducted during our review.

As part of our review, Lathrop GPM has made recommendations for changes to Sword of the Spirit's and Servants of the Word's response policies and practices going forward. These recommendations are based in large part on the lessons learned from our review of the two matters and aim to avoid missteps in child safety matters in the future. As you will hear, our recommendations go beyond the minimum requirements under the law and strive to meet the best practices for protecting children. Our recommendations are not meant to suggest that every

community needs improvement in each of these areas, rather our recommendations look to bring consistency in the approach to these issues. The below summarizes our findings from the two individual matters that led to those recommendations. Although at times individuals in Sword of the Spirit and Servants of the Word took actions they believed to be appropriate responsive action, such actions were insufficient, as evidenced by the findings below. Our findings focus on the ways in which the organizations failed to take appropriate responsive action.

In November 2022, Lathrop GPM orally presented its recommendations for changes to child safety policies and procedures in detail to representatives of Sword of the Spirit and Servants of the Word. Because Sword of the Spirit and Servants of the Word made the decision to pause the review of the two specific matters during litigation, our work in continuing to gather information on the Conlin and Treadwell matters was again delayed. In December 2023, Lathrop GPM orally presented its findings as to the organizations' responses to these two child safety matters in detail to representatives of Sword of the Spirit and Servants of the Word.

Summary of Findings

Conlin

Sword of the Spirit and Servants of Word failed to take appropriate responsive action when presented with concerns about Conlin. As discussed below, Conlin admitted to conduct with a minor while in Belfast that should have resulted in his removal from all Communities but it did not. Rather than investigate, the organization believed Conlin and continued to trust that he was truthful that he would not and did not engage in further conduct with youth. In addition, they trusted him to comply with the restrictions they had put in place and to appropriately disclose those restrictions to others. This, coupled with inadequate information sharing and inadequate restrictions that were not properly enforced, allowed Conlin to continue to serve in Sword of the Spirit Communities and have exposure to youth and young women as a representative of Servants of the Word. Again, Conlin should have been removed from all Communities in light of his conduct. And given the unique trust that is placed in brothers, before allowing Conlin to interact with members of these Communities, there should have been broad disclosure to members of these Communities of his past conduct and the restrictions placed on him.

- Servants of the Word did not take responsive action when they first learned of allegations of concerning behavior by Conlin in connection with his work with Youth Initiatives in Belfast. These allegations of a physical relationship with a minor that was sexual in nature should have immediately been investigated and steps should have been taken to ensure he did not have contact with minors while the investigation was taking place.
- When similar concerns were raised a few years later, Conlin admitted to conduct with a minor that was clearly sexual and possibly criminal. Based on the admitted conduct, the age difference between Conlin and the minor, and Conlin's position of authority, he should have been removed from all Communities. However, he was not removed.
- Youth Initiatives conducted an investigation, and as a result of the investigation, it dismissed Conlin from Youth Initiatives. Youth Initiatives also reported the matter to

local law enforcement. Unlike Youth Initiatives, Servants of the Word allowed Conlin to continue to be a part of their community. Each time Servants of the Word learned of concerns about Conlin's relationship with minors at Youth Initiatives, they took Conlin at his word about the extent of his relationship with those minors and did not take steps to further investigate the additional allegations as they should have.

- Instead of conducting an appropriate investigation into the concerns about Conlin's relationship with minors at Youth Initiatives and removing Conlin from all Communities as it should have, Servants of the Word moved Conlin to the United States. We do not believe that implementing restrictions is a sufficient way of safeguarding against future abuse of children. As evidenced in this case, restrictions are difficult to monitor and enforce. One challenge is ensuring that the restrictions are broadly communicated so that anyone who may interact with the individual is aware of the restrictions. The restrictions placed on Conlin were inadequate, were not appropriately monitored, and compliance was not consistently enforced. In addition, there were no consequences when Conlin violated the restrictions.
- The communication and information sharing relating to Conlin's past conduct and the restrictions in place were wholly inadequate. Again, we believe the appropriate responsive action was to remove him from all Communities. That being said, if someone who has violated any child safety rules remains in a community, disclosure needs to be made to community members so that they can take adequate precautions. Before Conlin was moved into a new community, community leaders and community members should have been made aware of his past conduct and the restrictions that were put in place. Only a limited number of individuals within Servants of the Word and Sword of the Spirit were informed of Conlin's past conduct and/or the restrictions that were in place. There is no evidence that Servants of the Word broadly disclosed Conlin's past conduct and restrictions to all members of the Sword of the Spirit Communities he was interacting with when he moved to the United States.
- When individuals reported concerns relating to Conlin's interactions with minors and young adults in the United States, Servants of the Word again failed to take appropriate responsive action. At times, Servants of the Word was dismissive of the concerns or responded in ways that were defensive of Conlin. Throughout his time with the organization, Servants of the Word continued to inappropriately trust Conlin and defend him. They relied on his representations that he had disclosed his restrictions without further verification and that he would follow his restrictions despite a history of not complying with them.

Treadwell

Sword of the Spirit and Servants of Word failed to take appropriate responsive action when presented with concerns about Treadwell. As discussed below, multiple individuals raised concerns about Treadwell's interactions with children, including that he repeatedly engaged in conduct that was in violation of child safety rules while he was in London. In addition, Treadwell self-disclosed conduct that violated child safety rules. Based on these repeated violations, he

should have been removed from all Communities, but he was not. Without properly addressing the concerns by conducting an investigation, Treadwell was moved to the United States. Treadwell was permitted to work at a school, join Sword of the Spirit Communities, and interact with children. We found no evidence that there were any disclosures made to the groups he interacted with or that there were any restrictions regarding his interactions with children. After reports were made to the Michigan police in 2016, based on those reports and prior violations of the child safety rules, Treadwell should have been removed from all Communities. Servants of the Word leadership improperly relied on the fact that no criminal charges were filed as part of the initial criminal process in Michigan, allowing Treadwell to stay in Communities. Although restrictions on Treadwell's ability to interact with children were put in place, those restrictions were inadequately monitored and enforced, and there were no consequences when he violated them.

- Servants of the Word brothers and others in the Sword of the Spirit community in London knew of concerns involving Treadwell during his time in London but failed to take adequate responsive action. These concerns included allegations that Treadwell engaged in conduct that violated the child safety rules on multiple occasions. At this point, the concerns that had been raised did not include allegations of sexual abuse. The concerns about violations of the child safety rules were not properly investigated, and other than speaking to Treadwell, no further action was taken to address the concerns. Based on our review, some of the individuals who raised or were aware of the concerns seemed to be primarily focused on the well-being of Treadwell; they did not appear to recognize the concerns as a child safety issue. In addition, there was inadequate information sharing by and among the people who were aware of the concerns. There appears to have been a misunderstanding of obligations regarding confidentiality which impacted what information was shared and to whom. Because of the inadequate information sharing, those who raised or were aware of the concerns did not recognize there was a pattern of similar concerning conduct by Treadwell.
- To be clear, even a single violation of a child safety rule should have been investigated to determine what happened and appropriate action should have been taken based on that determination. The concerns, the investigation, and the outcome should be formally documented.
- Based on the fact that there were multiple individuals who raised concerns about Treadwell violating child safety rules on multiple occasions, at the very least, the concerns should have been formally documented and Treadwell should have been warned that any future violations of the child safety rules could result in his dismissal from all Communities.
- While he was still in London, individuals within Servants of the Word's leadership were aware that Treadwell had self-disclosed violating its child safety rules. Given the prior concerns about Treadwell's violation of the child safety rules and his self-disclosure of continuing violations, he should have been removed from all Communities at this time. He was not removed from Communities; he was sent to the United States. Treadwell was permitted to work at a school, join Sword of the Spirit Communities, and interact with

children. In our review, we found no evidence that any of these groups were made aware of the prior child safety violations. Similarly, we found no evidence that any restrictions were put in place, and if there were restrictions regarding his interactions with children, they were clearly not being followed.

- In 2016, after Michigan families made reports to police, Servants of the Word placed Treadwell on restrictions, attempting to significantly limit his ability to interact with children. Given the earlier violations of the child safety rules coupled with the allegations of criminal sexual conduct, placing Treadwell on restrictions was not the appropriate responsive action. Treadwell should have been removed from all Communities. Servants of the Word leadership incorrectly believed that the outcome of the criminal matter should impact its responsive action. The criminal process uses a much higher standard of evidence than should be used by the organization. In addition, a criminal process in the United States can often take years to resolve. For these reasons, the organization should neither have waited for the conclusion of nor based its responsive action on the outcome of the initial criminal process.
- After the initial criminal process resulted in no charges being filed, Treadwell remained in Communities and continued to have restrictions. The restrictions placed on him were not adequately monitored or enforced. There were no consequences when Treadwell violated the restrictions.

Summary of Recommendations

Sword of the Spirit communities are unique organizations with a structure that, while key to serving their mission, also creates challenges for child safety. Sword of the Spirit is a federation of self-governing local communities, one of which is Servants of the Word. When a local community enters into the covenant of membership, the community enters into the international community of communities, united by international leadership.

For individuals, becoming a member of a Sword of the Spirit community means making a commitment to local community members, as well as to the members of other Sword of the Spirit communities worldwide. As noted on Sword of the Spirit's website, "For community life to work well, we have to be able to rely on one other, and, in our experience, this requires a higher degree of commitment than is typical in most church settings." This trust also extends to Servants of the Word brothers serving in Sword of the Spirit communities. Sword of the Spirit communities actively encourage relationships across generations and put many resources into their work with young people.

The commitment and trust within a self-governing community fosters the community life that allows Sword of the Spirit communities to carry out their mission. But the strong ties of community life can also create an opportunity for individuals with bad intentions to take advantage of the trusting nature of community relationships. Given this reality, Lathrop GPM's recommendations were focused not only on the minimum requirements under the law, but also on the best practices for protecting children. Our recommendations go above and beyond what is legally required and strive to meet the highest standards for keeping children safe.

Lathrop GPM recognizes that current policies and practices differ between Sword of the Spirit communities and some communities may already be meeting best practices in particular areas. Our recommendations are not intended to suggest that every community needs improvement in each of these areas. Rather, our recommendations look to bring consistency to the approach on these issues to ensure that all Sword of the Spirit communities are meeting best practices in child safety.

Sword of the Spirit communities have made efforts over time to improve their child safety prevention and response efforts. Lathrop GPM's review, however, has identified gaps in the organizations' current policies and procedures, a lack of expertise within the organizations on best practices for protecting children, and a culture that at times creates an environment that discourages reporting of concerns related to child safety.

With those issues in mind, Lathrop GPM has concluded that Sword of the Spirit communities' prevention and response efforts will be greatly improved by a centralized, consistent response to child safety concerns involving individuals with expertise in child safety. To that end, Lathrop GPM is recommending the creation of a centralized child protection committee to oversee all child safety prevention and response efforts for all Sword of the Spirit communities, including Servants of the Word. Additional recommendations regarding the creation and responsibilities of the child protection committee include:

- The child protection committee will include trained representatives from multiple different communities, including both men and women, and will report directly to the International Executive Council;
- The child protection committee will set specific mandatory requirements for each community's child safety policy, including rules for appropriate interactions with children, among other requirements;
- The child protection committee will provide training to each community, as further discussed below;
- Individuals in leadership, those with a role in safeguarding/child safety, and youth workers in each community will be required to report to the child protection committee when a child safety concern is raised in any Sword of the Spirit community. Members of a community outside of those roles will be encouraged to report concerns to the child protection committee;
- The child protection committee will oversee the response process when a child safety concern is raised. The child protection committee may seek support and input from any involved community, but the committee will determine the appropriate response process;
- The child protection committee will take steps to ensure that committee members involved in any such response process do not have any conflict of interest or bias related to the matter (including adopting a procedure requiring a committee member to recuse him or herself when a child safety concern involves his or her community or region).

Lathrop GPM also made specific recommendations related to many other aspects of the prevention and response efforts of Sword of the Spirit communities, including Servants of the Word, including the following recommendations:

- Revise the screening process for new members of communities to more consistently and thoroughly screen for concerns related to child safety;
- Provide increased training, incorporating additional content for expanded audiences and with greater frequency. Topics should include appropriate interactions with minors, how to recognize common grooming behaviors and other warning signs, how to report concerns related to child safety both to Sword of the Spirit and to government authorities, as well as age-appropriate education for children in Sword of the Spirit communities to help children recognize and report abuse;
- Expand scope of communities' child safety policies to apply to informal gatherings among community members;
- Adopt a consistent protocols for sharing information when a community member will be transferring to a different community or is being given a service to a different community;
- Educate communities on limits of confidentiality in child safety matters and how to handle matters discreetly without compromising safety;
- Involve outside legal counsel with expertise in child safety to provide advice throughout the process when a report of child abuse is received;
- Adopt consistent protocols for reporting allegations of child abuse to government authorities, even when there is not a legal duty to do so;
- Adopt consistent protocols for the child protection committee to put protective measures in place following a report of child abuse;
- Adopt a consistent investigation process overseen by the child protection committee, involving only individuals who are free of conflict of interest and bias, to gather information and come to a decision regarding reports of child abuse;
- Adopt consistent protocols for removing a member of a community when there is sufficient evidence to determine it is more likely than not that a member engaged in sexual abuse of a child;
- Adopt policies to consistently provide resources and support to victims during and after the investigation;
- Adopt consistent protocols for communicating with communities and other impacted organizations following a report of potential abuse, including a warning communication when an allegation of abuse is raised;
- Implement overall changes to policy and procedure aimed at eliminating or reducing barriers to reporting and strengthening the prevention and response efforts.

Lathrop GPM has also made specific recommendations relating to the organizations' past responses to the Conlin and Treadwell matters. Lathrop GPM recommends that all of the leaders who were aware of child safety concerns in either of those matters and failed to take appropriate responsive action receive individualized training. The training should include a discussion of the missteps they made so that they are better equipped to respond to child safety reports in the future. We also recommend that these leaders take appropriate steps to seek reconciliation with those who were harmed by their actions. Taking into account the circumstances of each individual's involvement, Lathrop GPM has recommended that five of these leaders be ineligible to serve in leadership positions within Sword of the Spirit and be ineligible to serve as Presiding Elder, Regional Elder, and Child Protection Officer in Servants of the Word.

The goal of Lathrop GPM's recommendations is for Sword of the Spirit and Servants of the Word to protect children from abuse and to respond appropriately when incidents of child abuse do occur, including providing care to the victims and ensuring accountability for the perpetrators.

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