Firefly

Independent Investigation into Child Protection Failures and Institutional Response at the Carlisle Brethren in Christ Church

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3. Executive Summary

Firefly conducted an independent investigation of historical and contemporary actions taken by the Carlisle Brethren in Christ Church and affiliated individuals in response to disclosures of child abuse involving Survivor Greta Roberts and her siblings. Based on the available evidence, Firefly concludes that the Carlisle Brethren in Christ Church's initial response in the late 1970s was generally consistent with the statutory requirements applicable to church leadership during that period. Although Pennsylvania law did not require clergy to report abuse at the time, Associate Pastor Ken Hoke sought outside assistance by contacting Gary Shuey (now deceased), then Director of Cumberland County Children and Youth Services. Hoke disclosed concerns regarding the alleged abuse of Roberts and her siblings by her parents, George and Rachel Kibler. Because child abuse reports and agency responses are confidential, the available evidence does not establish whether Shuey subsequently filed a formal report or what actions, if any, Children and Youth Services took in response. The evidence does not support a finding that church leadership intentionally concealed or deliberately failed to report under the legal standards applicable at the time.

Following Pastor Hoke's contact with the Director of Cumberland County Children and Youth Services, the Carlisle Brethren in Christ Church elected to conduct a Matthew 18-style meeting with George and Rachel Kibler. Church members also arranged for Roberts to leave the Kibler home; however, Firefly found no evidence that church leadership implemented protective measures for the younger siblings who remained in the home, leaving their safety unaddressed during a known period of risk. Under modern child protection standards, direct engagement with alleged perpetrators without coordination with child-welfare authorities should be avoided due to risks of retaliation, interference with investigative processes, and potential coercion of child victims. While such practices were not uncommon in church-based settings at the time, this decision introduced avoidable risks and reflects a procedural gap between pastoral practice and child-safety protocols.

Significant institutional concerns arise from the Brethren in Christ U.S. (BIC U.S.)[1] actions during the 2025–2026 investigative period. In March of 2025, BIC U.S. commissioned Godly Response to Abuse in the Christian Environment (GRACE)[2] to investigate Greta Roberts' prior allegations of abuse by her parents, and to conduct a broader assessment of related conduct by Associate Pastor Ken Hoke, any additional victims or perpetrators connected to BIC U.S., and the denomination's institutional knowledge and cultural response to such allegations. GRACE terminated this contract in September of 2025. After GRACE withdrew from its contract, Roberts was not notified and learned of the termination only through a third party. BIC U.S. subsequently explained that GRACE had advised that it would notify Roberts directly and had instructed BIC U.S. to refrain from contacting her until that notification occurred. Regardless of how the initial notification failure occurred, the resulting breakdown in communication was followed by a period in which Roberts received no substantive information regarding whether or

[1] Hereinafter referred to as BIC U.S.
[2] Hereinafter referred to as GRACE

how the investigative process would continue. When Telios Law was engaged in 2026 to review the allegations made by Greta Roberts, Roberts was neither informed nor interviewed, despite being the complainant and central witness. These omissions constitute substantial departures from trauma-informed standards, best-practice investigative protocols, and principles of procedural fairness.

The Telios Law assessment identified evidence of neglect, physical abuse, and emotional abuse. Roberts was informed of these findings only after the assessment concluded, via correspondence dated June 18, 2026, from BIC U.S. leadership. The absence of prior notification or participation deprived Roberts of transparency and meaningful involvement in a process directly concerning her disclosures. The lack of timely communication diminished the impact of the institutional remorse expressed at the conclusion of the assessment and did not remedy the procedural deficiencies identified.

Overall, the evidence demonstrates that certain actions taken by the leadership of the Carlisle Brethren in Christ Church in the late 1970s aligned with the legal expectations of the time. The available evidence does not support the allegations that church leadership intentionally concealed Roberts' original disclosure or deliberately failed to seek outside intervention. At the same time, the historical response lacked formal policies, coordinated safety planning, and child protection procedures expected under modern safeguarding standards. Although church leaders appear to have acted with the belief that they were helping Roberts and her family, Firefly found no evidence that specific protective measures or safety planning were implemented for the younger siblings who remained in the home following the disclosure.

More substantial concerns arise from the institution's 2025–2026 response, which exhibited significant deficiencies in communication, coordination, trauma-informed practice, and accountability. The repeated initiation, suspension, and redirection of investigative efforts created procedural instability and contributed to re-traumatization. The evidence further supports concerns regarding institutional betrayal, particularly where survivor communication, transparency, participation, and procedural fairness were not consistently maintained during subsequent investigative processes. While the evidence does not support findings of intentional concealment of Roberts' original disclosure, it does demonstrate institutional actions and omissions that reasonably contributed to survivor frustration, mistrust, and compounded trauma.

These findings demonstrate the need for comprehensive policies, survivor-centered communication protocols, and accountability structures to ensure compliance with modern child protection standards and safeguard the rights and well-being of individuals reporting abuse.

4. Introduction

The investigation was initiated at the request of Survivor Greta Roberts**,** who sought an independent third-party investigation of her disclosure of child abuse to the Carlisle Brethren in Christ Church regarding the abuse she and her siblings experienced in the 1960s and 1970s, as well as the subsequent actions taken in 2025 and 2026 by BIC U.S. This report evaluates the

church's institutional response, identifies procedural and ethical concerns, and determines whether the actions of clergy, staff, or denominational leadership constituted institutional betrayal,[3] emotional misconduct, or failures to fulfill applicable child-abuse reporting obligations.

5. Investigative Scope

The Investigator Services Agreement between Firefly and Greta Roberts, dated April 27, 2026, established the parameters for an independent, third-party investigation into the Carlisle Brethren in Christ Church. Firefly was tasked with determining whether clergy, staff, or volunteers engaged in institutional betrayal, emotional misconduct, and whether individuals in positions of authority concealed reports or contributed to reporting failures that increased harm or compounded survivor trauma.

The Agreement further required Firefly to assess the adequacy and implementation of BIC U.S.'s Child Protection Policy and to evaluate the 2025 – 2026 investigations conducted by GRACE and Telios Law using the trauma-informed principles established by the Substance Abuse and Mental Health Services Administration (SAMHSA). This evaluation included determining whether an adequate policy existed, how effectively it was implemented, and whether additional actions could reasonably have been taken to better fulfill the policy's intent and protect the interests of individuals reporting abuse.

The scope also included evaluating the church's response to child protection concerns, including the extent to which the organization emphasized Ministerial Misconduct policies over Child Protection obligations.

The scope also permitted Firefly to review additional allegations of sexual misconduct, physical abuse, emotional misconduct, or professional boundary violations discovered during the investigation and directly or indirectly connected to BIC U.S.

6. Methodology

The investigation relied on a combination of interviews, survivor testimony, documentary evidence, and analysis of historical and contemporary child protection standards. Materials reviewed included internal church correspondence, communications with external investigative bodies, and relevant legal authorities. Whenever possible, Firefly corroborated findings through multiple sources. Firefly reached its findings based on the totality of the available evidence, considering the consistency, reliability, corroboration, and context of the information obtained.

[3] Definition of Institutional Betrayal. For purposes of this Agreement, Institutional Betrayal shall mean wrongdoing perpetrated by an institution upon individuals who depend on that institution for safety, care, or accountability. This includes but is not limited to: failure to prevent harm when the institution had a duty of care, failure to respond adequately or supportively to reports of abuse or misconduct, active concealment or minimization of abuse, misconduct, or systemic failures; and actions or omissions that compound harm by prioritizing institutional reputation over the well-being of victims. This definition is intended to ensure that Firefly's investigation addresses not only individual misconduct but also systemic failures and concealment practices that may have exacerbated harm within the Carlisle Brethren in Christ Church.

Interviews were conducted with clergy, denominational leaders, and individuals with direct knowledge of the events. The investigation also evaluated the extent of survivor participation in the investigative processes undertaken by BIC U.S. during 2025 and 2026, including Roberts' lack of notice regarding, or participation in, the Telios Law assessment. All findings were assessed against established procedures, organizational responsibilities, and the standards of care applicable during the period under review.

BIC U.S. fully cooperated with Firefly throughout the investigation and provided all requested documents and communications. Although BIC U.S. requested a temporary pause in the investigative process due to the 2026 Telios Law review, Firefly did not halt its work and remained fully independent in all investigative activities. The request did not alter Firefly's investigative scope, findings, or conclusions, and Firefly identified no effort by BIC U.S. or any other party to influence, limit, or redirect the outcome of the investigation.

7. Background/Context

7.1 Institutional Reforms

BIC U.S. is a large and decentralized denomination, consisting of approximately 231 congregations and an estimated 24,000 worshippers. While the denomination establishes overarching parameters for governance, each congregation is self-governing within those boundaries, allowing for variation in leadership structures, ministry models, and local policy development. Congregations are organized into seven Regional Conferences overseen by Regional Bishops, but responsibility for creating and implementing operational policies, including child protection procedures, rests with each individual congregation.

In an email dated June 18, 2026, Peter Guinther, BIC U.S. Human Resources Administrator, reassured Greta Roberts that child protection laws had been strengthened in recent years and stated that BIC U.S. had been working to improve its prevention and response efforts regarding abuse. Guinther described several institutional reforms it has implemented in recent years to strengthen child protection and improve its response to allegations of abuse. According to the church, these measures were undertaken in recognition of evolving legal standards and best practices in safeguarding children. BIC U.S. reported revising the Congregational Governance section of its Manual of Doctrine and Government to include procedures for addressing allegations of pastoral misconduct, including prompt notification of the Bishop and mandated reporting to governmental authorities. The denomination also instituted background checks and screening processes for credentialing candidates, and its World Missions department adopted a Child Safety and Protection Policy developed with guidance from the Child Safety Protection Network. Missionaries now receive child-safety training before deployment and during service, supported by a designated Child Safety Officer and team.

BIC U.S. further reported the establishment of a Member Care Administrator role within World Missions, with specialization in Third-Culture Kids, to provide structured debriefing and support for missionary families. The denomination also developed a Policy and Procedures for

Responding to Ministerial Misconduct, finalized in February 2025 with guidance from GRACE, and incorporated both GRACE and Telios Law curricula into trauma-informed training for Response Team members. Additional steps included leadership training on recognizing and responding to abuse within church contexts and ongoing development of educational programs for pastors related to abuse prevention and trauma-informed care. As described by BIC U.S., these reforms were presented to the survivor as evidence of the denomination's efforts to improve its safeguarding practices and stay current with emerging standards in child protection.

The reforms provide important context for evaluating BIC U.S.'s contemporary response to Roberts' allegations. Accordingly, Firefly considered not only whether policies and safeguarding measures had been developed, but also how those measures were implemented during the 2025–2026 investigative process.

At the same time, BIC U.S. took meaningful steps to strengthen its response framework. The decision to engage an independent third-party investigation and implement a ministerial misconduct policy in 2025 demonstrates an institutional willingness to improve safeguards, enhance accountability, and move toward more trauma-informed practices.

7.2 Survivor Background and Disclosure

Survivor Greta Roberts stated that from birth in 1960 until she left home in 1978, she and her siblings experienced continuous physical and emotional abuse at the hands of her parents, George Kibler and his wife, Rachel Kibler (now deceased), marked by belittlement, beatings, and ongoing intimidation throughout her childhood and adolescence. She reported that the household environment during those years was characterized by fear, unpredictability, and strict control, where even minor mistakes resulted in harsh discipline.

According to her, the household was typically quiet, and yelling occurred only when her father was preparing to beat the children or was actively doing so. She stated that the most common sounds in the home were her mother sobbing in her bedroom and her father speaking with her in an effort to determine what was wrong. She reported that their mother kept a mental ledger documenting the children's perceived failures throughout the day and would share it with their father when he returned home from work or from his frequent committee meetings. She described that she and her siblings moved through the home in a constant state of vigilance, tiptoeing and trying to anticipate what they might have done wrong, though they were never told.

Rachel Kibler was described by multiple individuals interviewed by Firefly as a dominant and demanding person. Some individuals noted that her communication style could be forceful, and she often insisted that situations be handled according to her preferences. Because of this, church leaders frequently hesitated to confront her or challenge her decisions, even when concerns were raised. Several interviewees indicated that Rachel's strong personality created an environment in which leaders felt intimidated or unsure about how to approach difficult conversations, contributing to a pattern of avoidance rather than intervention.

Greta Roberts further described affection and emotional support as absent in the home, stating that she never sought comfort from either parent because she knew it would not be available. She reported that as she and her siblings grew older and began forming their own thoughts and asking questions, her parents increasingly relied on manipulation, control, and violence to maintain authority. She recalled taking on a protective role for her younger siblings, attempting to shield them from the worst of the harm, which placed significant emotional strain on her throughout her childhood.

She stated that both her parents and her siblings were active within the Carlisle Brethren in Christ Church. Her parents served as missionaries and held prominent roles within the church community. Her father served as president of Messiah Lifeways, and her mother was a Christian counselor, pianist, and organist.

Greta Roberts reported that the Carlisle Brethren in Christ Church communities in Carlisle, Pennsylvania, and Zambia were the only world she knew. Nearly every meaningful relationship in her life existed within those church communities. Other than her high school teachers, she knew virtually no one outside the church. When she considered seeking help for the abuse at home, there was nowhere else to turn because there was simply no one else she knew.

Greta Roberts stated that when she was seventeen and preparing to leave for college, she became acutely aware that her younger sister and brother would remain in the home without her for several more years, continuing to endure the abuse she had long tried to buffer. She described a profound sense of fear and responsibility as she realized her departure would leave them without any protection. She emphasized that this concern for her siblings rather than any desire for her own safety was the sole reason she decided to disclose the abuse to Associate Pastor Ken Hoke. She reported that this was the first time she had ever shared details of the abuse with an adult outside her home. She explained that she sought guidance from someone in a position of authority within the church because it was the primary community and source of authority she knew of outside her family. She hoped that Pastor Hoke might be able to help her understand what options existed to safeguard her sister and brother.

She further stated that when she approached Pastor Hoke, she did so without any clear understanding of how situations involving child abuse were handled or what protective measures might be available. She explained that when Pastor Hoke asked her what she thought should be done, she struggled to answer because, as a child herself, she had no knowledge of the systems or processes involved in protecting minors. She reported that the only possibility she could imagine was whether her siblings could be removed from the home, not because she was insisting on that outcome, but because it was the only idea her seventeen-year-old mind could formulate when no other alternatives were offered.

Greta Roberts stated that after she disclosed the abuse, Pastor Hoke contacted a friend of his who worked in Child Services. She reported that, to her knowledge, the only question he asked was whether her younger siblings could be removed from the home. She emphasized that many other protective measures could have been explored, including periodic check-ins with her siblings and

parents, mandatory counseling for her parents, a formal investigation, or providing her siblings with a phone number to call if they were in danger. She stated that, to her knowledge, none of these options were pursued. When Pastor Hoke asked Greta what she thought should be done he relied solely on the single idea she had offered, an idea she stressed was not a demand but simply the only option she could conceive at such a young age when he asked her what she thought should be done. She reiterated that she had no understanding of child protection processes and had sought help precisely because she was a child who did not know what else could be done. She stated that Pastor Hoke listened to her but offered no additional guidance or alternatives, leaving her to believe that no further action was taken to protect her younger siblings.

7.3 Mandatory Reporting Context

Roberts' 1978 disclosure must be considered within the legal framework of Pennsylvania's child protection laws in effect at that time. The Commonwealth of Pennsylvania first enacted mandatory reporting requirements for child abuse in 1963; however, at that time, the law mandated reporting only by medical providers. No other professionals or community members were legally obligated to report suspected abuse.

In October 1975, the statute was amended to strengthen penalties for failing to report and to expand the list of mandated reporters. The revised law added coroners, dentists, school officials, social service agencies, day care providers, and law enforcement officers to the list of individuals required to report suspected child abuse. Clergy members were not included in the 1975 expansion and, therefore, Pastor Hoke was not a mandated reporter by virtue of his position as a member of the clergy during the period when Roberts disclosed abuse to him.

The law was later amended in 1995 to include members of the clergy among those required to report suspected child abuse when they have "reasonable cause to suspect" that abuse has occurred. Certain confidential communications involving clergy remained subject to statutory privilege protections. These later amendments, however, were not in effect when Roberts made her disclosure to Pastor Hoke and are included here only to distinguish the legal requirements applicable at the time of her disclosure from those adopted in later years.

Although Pastor Hoke was not a mandated reporter by virtue of his clergy position at the time of Roberts' disclosure, Pennsylvania law did impose reporting obligations on certain other professionals, including physicians. This distinction is relevant to the involvement of Dr. Ivan Beachy and Dr. Stan Beachy and is addressed separately in the Findings and Conclusions of this report.

8. Findings

8.1 Initial Church Response

Greta Roberts' disclosure occurred during a period when the Carlisle Brethren in Christ Church had no written policies or formal procedures in place concerning the reporting or handling of sexual or physical abuse of children. Firefly identified no evidence that the denomination provided training, guidance, or instruction to its pastors or lay leaders regarding child protection or appropriate responses to disclosures of abuse. As a result, clergy were left to rely on personal judgment, informal networks, or individual discretion when confronted with situations involving potential harm to minors.

Although Pastor Hoke was not a mandated reporter under the 1975 Pennsylvania child protection law, and although the church offered no institutional framework to guide his response, he chose to seek outside advice. He contacted Gary Shuey, a personal acquaintance who was serving as the Director of Cumberland County, PA, Children and Youth Services at the time. Firefly found no evidence that Pastor Hoke made an official report to the statewide ChildLine hotline or directly to Cumberland County Children and Youth Services; instead, his outreach consisted solely of an informal conversation with Director Shuey.

The following description of Pennsylvania's child-abuse reporting process is included to provide context for readers who may not be familiar with how Children and Youth Services operated during the period in question. Its purpose is to clarify the significance of Director Gary Shuey's role and why, as the head of the agency, he should have or may have made an official report based on the information Pastor Hoke shared with him. Pennsylvania's county-based Children and Youth Services agencies serve as the primary entities responsible for receiving and responding to reports of suspected child abuse. The statewide ChildLine hotline, operated by the Pennsylvania Department of Human Services, functions as the central intake system for all child-abuse reports. When a call is received, ChildLine screens the information and immediately routes the report to the appropriate county's Children and Youth Services office for investigation and follow-up. County Children and Youth Services agencies are tasked with assessing child safety, conducting interviews, coordinating with law enforcement when necessary, and determining whether protective services or emergency interventions are required. As the designated investigative authority under Pennsylvania's Child Protective Services Law, Children and Youth Services plays a central role in ensuring that allegations of abuse are promptly evaluated and that children receive appropriate protection and support.

Pastor Hoke's outreach occurred without any denominational expectations, oversight mechanisms, or established protocols that might have shaped or supported a more comprehensive response. The lack of training and formalized procedures within the Carlisle Brethren in Christ Church meant that pastors had not been formally equipped by the denomination to recognize the full range of available protective options, nor were they provided with tools to ensure that disclosures of abuse were handled consistently, thoroughly, or in alignment with emerging child protection standards.

Director Shuey, unlike Pastor Hoke, was a mandated reporter under the 1975 statute. In his professional capacity as Director of Cumberland County, PA, Children and Youth Services, he was legally required to report suspected child abuse. According to Pastor Hoke, Director Shuey advised him that removing children from their homes was difficult and that the agency generally preferred to keep families intact whenever possible. Based on this guidance, Pastor Hoke understood that a comprehensive removal of the children from the home was unlikely.

Pastor Hoke stated in an interview with Firefly, “I was not successful in removing all three children from the home, and I’m not sure who I would have contacted back in that time outside the director of Children and Youth Services of our county.” Hoke went on to state, referring to Roberts, “We talked it through, and I was able to remove her.”

Because mandated child abuse reports and agency responses are confidential, the available evidence does not establish whether Director Shuey filed an official report or what actions, if any, Children and Youth Services took in response. Given this confidentiality and the fact that Pastor Hoke had consulted directly with the county’s highest-level child protection official, Hoke’s ability to determine whether a formal report had been filed or what investigative or protective actions the agency may have taken would have been limited.

At this point, BIC U.S. did not have any formal child safeguarding policies. The denomination maintained a Manual of Doctrine and Government and, in 1978, published Quest for Piety and Obedience, a book reflecting theological and cultural trends within BIC U.S. during that era; however, neither document addressed child protection or the safeguarding of children.

According to BIC U.S. Human Resources Administrator Peter Guinther, “the earliest available resource related to misconduct or safeguarding within BIC U.S. is the BIC Guidelines for Pastors and Congregational Leaders (1993). While these guidelines do not specifically address child protection, they provide direction for responding to sinful sexual behavior by church leaders, including definitions, principles, procedures, assessment of accusations, response to church leaders and others involved, counseling and confession.” Guinther continued, “Child protection became a more formal focus within the BIC in 2002, soon after the Jerry Sandusky situation at Penn State became public. Brethren in Christ U.S. Leadership Council educated and requested local congregations in developing local policies and procedures for Child Safeguarding, and the bishops followed up on their implementation.”

Without formal church policies and procedures to guide him and having consulted with the Director of Cumberland County Children and Youth Services, Pastor Hoke sought support from church leadership to develop a protective response. He reached out to Senior Pastor Walter Winger and Dr. Ivan Beachy, both members of the Carlisle Brethren in Christ Church. Together, they formed a small group to consider possible steps to address the reported abuse and Roberts' safety. According to Pastor Hoke, the information he shared with Senior Pastor Walter Winger and Dr. Ivan Beachy conveyed that Roberts and her siblings were living in an abusive home environment, and he believed each member of the group understood the seriousness of the allegations.

Dr. Ivan Beachy subsequently contacted his brother, Dr. Stan Beachy, who had not been part of the group initially addressing Roberts' disclosure, and told him, “Hey, things with the Kibler family are not going well. Greta feels like she needs a place to stay because she can’t remain in that home.”

To provide immediate protection, Dr. Stan Beachy and his wife arranged for Greta Roberts to move into their home, removing her from the Kibler home and offering her a safe, stable place to stay while church leadership considered longer-term options. Roberts later shared that both Stan Beachy and his brother, Ivan Beachy, were a “lifesaving” presence during this period, even as she remained deeply worried about her siblings. While this arrangement created a short-term safety plan for Roberts, Firefly identified no evidence of a corresponding safety plan for the remaining children living in the Kibler household.

In an email sent by Dr. Stan Beachy to Greta Roberts on March 1, 2025, he wrote, “I would have to agree that you did everything that you could think of as a child and young adult to try to remedy an awful situation. I am sorry that so many of us failed to grasp the gravity of the situation and that we failed you. Yes, I do include myself in that failure. I hope you can forgive me for that.”

Pastor Hoke met with Greta Roberts' parents. He later explained that he believed this meeting aligned with the principles of Matthew 18, addressing wrongdoing directly with those involved, a step he viewed as part of the church’s process of reconciliation and accountability. In an email dated May 28, 2022, sent from Pastor Hoke to Roberts, he wrote, “You then parenthetically remembered some people coming to the house. I do realize the result of this made our coming more difficult for you and your siblings, but it was a way for us as the Church to acknowledge what had been told to us and confront your parents with this information. This did not prove to be a channel for change, either.” His words acknowledged that the in-person confrontation with the Kibler’s failed to bring change and, according to Hoke, made circumstances more difficult for Roberts and her siblings.

Despite the allegations of child abuse, Roberts’ parents continued to hold prominent roles within BIC U.S. and were subsequently assigned additional missionary, pastoral, and counseling responsibilities, along with receiving public recognition. Firefly found no evidence that church leadership initiated any disciplinary, corrective, or accountability measures toward Rachel and George Kibler at any time, nor any indication that leadership attempted to reassess their roles or responsibilities in light of the allegations.

On May 28th, 2022, Greta Roberts contacted Pastor Hoke to revisit the disclosure she made to him in the late 1970s about the physical and emotional abuse she and her siblings were experiencing in the Kibler home. She told him, “You were the adult I came to for help, and you didn’t pursue it. I guess it was acceptable to send us back into an abusive environment. You felt you’d done your part by talking to social services. We, the kids, were disposable.” Roberts reported that she was never informed that the church had arranged for her removal from the home and therefore did not understand that any protective action had been taken on her behalf.

As she prepared to leave for college, her primary concern was the safety and well-being of her younger siblings who remained in the home.

Pastor Hoke wrote back to Roberts, saying, “I do accept that what I was able to do or not do was a failure in terms of what you had asked me to do. I also realize that a large part of the failure was not doing something that protected [redacted] and [redacted]. I regret that you have carried anger about these things for all of these years. I desire that this process of writing may be a way for you and me to find some resolution.”

8.2 2025 Church Leadership’s Preliminary Actions

In 2025, Roberts independently contacted Tom Law, Chairman of the Board of BIC U.S., to disclose the full scope of the abuse she endured throughout her childhood and adolescence. She recounted the severe physical and emotional harm inflicted by her missionary-pastor parents, the absence of meaningful external support, and the church’s failure to act when she sought help as a teenager. Roberts described how, at seventeen, she informed her pastor, Ken Hoke, of the danger facing her younger sister and brother and asked him to intervene before she left for college. Despite her disclosure, no protective steps were taken. A church team later visited her parents but conducted only a brief interview and took no substantive action, leaving the children in an increasingly unsafe environment. Roberts emphasized that the church failed to fulfill its legal obligation to report the abuse to authorities, a failure that contributed to long-term emotional and psychological harm, including profound guilt over her inability to protect her siblings. During her meeting with Law, Roberts stated that acknowledging these failures was essential to her healing and requested a formal written admission from BIC U.S. recognizing the church’s failure to act and its impact on her and her siblings.

Board Chairman Tom Law explained that he had shared the substance of her letter and their conversation with National Director Alan Robinson, who agreed to meet promptly to discuss her concerns. Roberts was informed that the church’s initial response would be handled by a small group of senior leaders rather than the broader governing bodies. Law stated that, in accordance with Roberts’s request for privacy, the details of her disclosures would be limited first to himself, Robinson, and Human Resources Administrator Peter Guinther. He emphasized that this restricted approach was intended to expedite the church’s review of her allegations, avoid delays caused by involving larger committees, and protect her identity while the seriousness of her claims was being evaluated.

8.3 GRACE Investigation and Termination

When Survivor Greta Roberts came forward in 2025 to share concerns about how her situation was handled in the late 1970s, BIC U.S. initiated an independent third-party investigation. Alan Robinson, BIC U.S. National Director, stated, “I believe there were two primary reasons why BIC U.S. chose to begin an investigation with GRACE. The two ministers mentioned in Greta’s concerns were too well known within the BIC denomination that conducting an unbiased internal investigation, or even an internal investigation that seemed unbiased, would be difficult. So, we

consulted with GRACE, with whom we already had a working relationship from writing our Ministerial Misconduct policy, and they agreed that an external investigator would be appropriate."

In March of 2025, BIC U.S. commissioned GRACE to investigate Greta Roberts' prior allegations of abuse by her parents. The scope of the GRACE investigation was established in a written agreement between GRACE and BIC U.S. and outlined the parameters under which GRACE was authorized to conduct its review. GRACE was directed to examine the behavior of Ken Hoke during approximately 1977–1978, along with any related circumstances directly or indirectly connected to BIC U.S. (later amended to include all dates). GRACE was tasked with assessing the credibility of allegations that Hoke's conduct constituted professional boundary violations, emotional misconduct, or a failure to report abuse. In addition, GRACE was instructed to investigate any other potential or alleged victims or perpetrators of sexual misconduct, physical abuse, emotional misconduct, or professional boundary violations that emerged during the course of its work and were directly or indirectly related to the BIC U.S. Finally, GRACE was directed to evaluate the denomination's knowledge of these allegations and to assess how the culture of BIC U.S. influenced its responses, including how those responses aligned with best practices, Scriptural values, and SAMHSA's Six Principles of Trauma-Informed Practice.

GRACE terminated this contract in September of 2025. On September 23, 2025, Greta Roberts learned of the termination through a third party rather than directly from GRACE or BIC U.S. In a December 15, 2025, email to Roberts, Human Resources Administrator Peter Guinther wrote, "We are disappointed to read that you found out about GRACE discontinuing the investigation through a third party, not directly from GRACE itself. GRACE communicated with BIC U.S. that within 48 hours of notifying us that the investigation was being terminated, they would also notify you. Until receiving your email on Friday, BIC U.S. understood GRACE to have done so." According to Guinther, GRACE also instructed BIC U.S. to refrain from contacting Roberts until GRACE had notified her directly. Roberts stated that she never received that communication.

Guinther went on to explain to Roberts what GRACE had communicated to BIC U.S. regarding its decision:

"The decision to terminate the investigation was made in consideration of the actions of individuals that attempted to speak on behalf of the reporting victim and continuous rejection of the boundaries of communication and interaction put into place by the institutional response team. This resulted in the investigative team's inability to directly, appropriately, and independently verify and corroborate the reporting victim's account. Through no fault of the reporting victim or BIC US, communication and completion of an independent and objective investigation became untenable."

BIC U.S. also acknowledged Roberts' reflections on the emotional impact of the termination, stating, "We can understand your sentiments: 'When this process stopped abruptly, and

communication broke down, it mirrored earlier experiences of being dismissed and unheard. Maintaining momentum and follow-through will help prevent further re-traumatization and support the possibility of closure, accountability, and restoration." BIC U.S. expressed its desire to move in the same direction toward closure, accountability, and restoration. In pursuit of this, BIC U.S. stated that it would continue to follow its Ministerial Misconduct Policy.

BIC U.S. National Director Alan Robinson stated in an email dated May 2, 2026, to Firefly, "The termination was a disappointment to us for several reasons. Like you, we desire truth, safety, and integrity. We take all allegations seriously and seek to follow our policies. Second, we had complied with every aspect of the investigation. This included multiple persons (including myself) being interviewed by the GRACE investigators. A great amount of human and financial resources has been expended on the investigation and in our desire for truth. It was disappointing to discover that GRACE could not complete their work."

GRACE's termination created a gap in the investigative process. For several months, Greta Roberts received no substantive updates regarding whether the church intended to continue an independent investigation. According to Roberts, she was required to initiate repeated follow-up communications to determine whether any investigative process remained active. The communications Firefly reviewed reflect a period of uncertainty about the status of the investigation and the steps BIC U.S. intended to take after GRACE's withdrawal.

8.4 Transition to Telios Law

On May 13, 2026, Firefly notified BIC U.S. Chairman of the Board Tom Law that it had initiated an independent, third-party investigation. On May 21, 2026, Firefly was contacted by BIC U.S. National Director Alan Robinson, who stated that BIC U.S., upon learning that GRACE had terminated its contract, had decided to engage a second independent firm to conduct an additional review of the allegations and the church's response. At that time, Firefly was asked to "pause" its work until the findings from this review were received. On May 28, 2026, Robinson informed Firefly that BIC U.S. had received a report and statement of findings from the second firm, subsequently identified to Firefly as Telios Law. During this period, Survivor Greta Roberts was unaware that BIC U.S. had engaged Telios Law to conduct an additional review, and Telios Law never contacted or interviewed her. Because no one communicated this shift, Roberts did not learn the Telios Law review had occurred until after it concluded.

On June 12, 2026, Firefly contacted National Director Alan Robinson, Human Resources Administrator Peter Guinther, and Board Chairman Tom Law to request clarification regarding the transition from GRACE to Telios Law. Firefly specifically asked, "When the church contracted with Telios Law to continue the investigation, why was Greta Roberts not notified of that transition? And if you are able to speak to this, could you help me understand why she was never interviewed by Telios Law? Being informed and included, or at least having clarity about the process, is an essential part of trauma-informed practice, and I'm hoping to understand how these decisions were approached."

On June 12, 2026, Firefly received a response from Peter Guinther, who wrote: “I believe there were two primary reasons: BIC U.S. did not ask Telios Law to continue a full-blown investigation but just conduct some interviews. The information Greta has already submitted through her correspondence was sufficient for Telios Law to develop those interviews. Greta had expressed in her emails that the interview with GRACE and the other events of the past year had been retraumatizing, and we did not want to continue that in her life. Secondly, we had consulted with Telios Law about communicating these new developments with Greta, realizing that transparency is important in trauma-informed care, but Telios Law advised against this as the actions of Greta and her advocates already caused the previous work of GRACE to be terminated.”

From an analytical standpoint, this final assertion introduces an important distinction from the explanation previously attributed to GRACE. GRACE’s explanation referred to the actions of individuals attempting to speak on Roberts' behalf and to repeated violations of established communication boundaries. Guinther's June 12, 2026, response, however, attributed the termination more directly to “the actions of Greta and her advocates.” The available evidence reviewed by Firefly does not establish when or how responsibility for the termination was directly attributed to Roberts herself.

Firefly also evaluated this rationale against established trauma-informed principles emphasizing transparency, informed participation, and consistent communication with individuals directly affected by investigative processes. The decision to withhold information from Roberts, combined with the later attribution of GRACE's termination in part to Roberts herself, raises questions regarding internal communication, organizational oversight, and institutional decision-making. The available evidence does not fully explain how these decisions were documented or whether organizational policies were applied consistently.

The decision to conduct the Telios Law review without interviewing Greta Roberts limited the completeness of the investigative process. In investigations involving allegations of abuse, the reporting individual's account ordinarily provides the foundation for establishing chronology, identifying witnesses, evaluating corroborating evidence, and assessing the context of the allegations. Because Roberts was not interviewed, Telios Law did not have the opportunity to evaluate her account directly, clarify factual issues, or explore additional evidence that may have informed its findings. These limitations reduced Telios Law’s ability to fully assess the allegations and surrounding circumstances.

8.5 Additional Allegations Discovered During the Investigation

During the investigation, Firefly received information from survivors and witnesses describing additional allegations of sexual misconduct, involving individuals connected directly or indirectly to BIC U.S. These disclosures, while outside the original scope focusing on the Carlisle Brethren in Christ Church, were reviewed in accordance with the Investigator Services Agreement, which included additional allegations discovered during the investigation and directly or indirectly connected to BIC U.S.

Survivors and witnesses reported allegations of sexual abuse spanning several decades involving a lay church member (now deceased) within the Souderton Brethren in Christ Church. According to these accounts, the alleged perpetrator was not employed by BIC U.S., was never credentialed as a minister, served as a guidance counselor, and was elected in 1982 as a lay representative to the denominational Board of Christian Education. Witnesses stated that he used his roles within the church, local schools, and community organizations to gain access to and exploit individuals in vulnerable positions. Although his position on a denominational board was limited in authority, witnesses reported that it afforded him credibility and visibility within certain church circles.

Interviewees further reported that Pastor Darrel Brubaker (now deceased) attempted to bring forward disclosures from several men who reported abuse by this individual. According to witnesses, Pastor Brubaker's efforts were met with resistance, and his credibility was challenged by church leadership. Following what witnesses described as the dismissal of his concerns, Pastor Brubaker's parents organized a support group to advocate for the individuals who had come forward. Members of this group reported that when they attempted to present the survivors' accounts in 1990 to the Board of Bishops of BIC U.S., they were not permitted to speak.

Information provided to Firefly indicates that BIC U.S. conducted an internal review at the time, during which multiple individuals reportedly disclosed abuse. Witnesses described significant institutional barriers, including the minimization of concerns and directives to stop discussing the allegations.

According to denominational leadership, because the individual was neither an employee nor a credentialed minister, the Board of Administration had limited disciplinary authority, limited to removing him from all roles within the Church. Denominational leadership further reported that the broader response to this situation contributed to the development of the 1993 denominational guidelines, referenced earlier in this report, which were intended to strengthen institutional responses to allegations of abuse.

Given the seriousness of these allegations, the number of individuals reportedly affected, and the historical nature of the institutional response, Firefly finds that these disclosures warrant further inquiry. Firefly did not undertake a separate investigation sufficient to reach findings regarding the underlying allegations of abuse, and the inclusion of these allegations in this report should not be interpreted as a determination of the accused individual's culpability.

9. Conclusions

9.1 1970s Reporting Practices

Based on the available evidence, Firefly concludes that the Carlisle Brethren in Christ Church did not intentionally conceal Roberts' disclosure or deliberately fail to seek outside intervention. Church leaders responded in a manner generally consistent with the legal requirements

applicable to church leadership in the late 1970s. In the absence of written policies or formal procedures, Pastor Hoke sought outside assistance by disclosing concerns regarding the suspected abuse to the Director of Cumberland County Children and Youth Services. The available evidence indicates that Roberts was deeply affected by both the abuse and the limited protective systems for her siblings. While the evidence does not support a finding of intentional concealment or deliberate failure to seek outside intervention, additional measures could have been taken to strengthen safety and support for Roberts and her siblings. The historical response nevertheless lacked formal safety planning, trauma-informed practices, and institutional procedures considered essential under modern child protection standards.

9.2 Mandated Reporter Responsibilities

Although the Carlisle Brethren in Christ Church's institutional response aligned with the expectations and child protection practices of the late 1970s, the responsibilities of individual mandated reporters present a distinct and important consideration. At the time these disclosures were made, both Dr. Ivan Beachy and Dr. Stan Beachy were mandated reporters under Pennsylvania law. Based on the available evidence, Firefly cannot determine whether Dr. Ivan Beachy fulfilled his individual reporting obligation because he is deceased and the investigation found no evidence that he made a report. With respect to Dr. Stan Beachy, his acknowledgment that he did not make a report raises a separate question regarding compliance with the reporting requirements applicable to him as a mandated reporter. However, any conclusion that he violated Pennsylvania's mandatory reporting law would require consideration of the specific statutory reporting threshold in effect at the time and whether the information known to him satisfied that threshold.

9.3 Procedural and Safety Failures

The church's subsequent decision to proceed with a Matthew 18-style meeting with the parents after Pastor Hoke had disclosed the concerns to the Director of Children and Youth Services warrants further analysis. Under modern child protection practices, direct engagement with alleged perpetrators following a disclosure of suspected child abuse should be coordinated with child-welfare authorities to avoid interfering with investigative or protective efforts. An uncoordinated meeting with alleged perpetrators may alert them to the disclosure, increasing the likelihood of retaliation, heightening the danger to children remaining in the home, and increasing the risk that child victims may recant or minimize prior disclosures because of family pressure, fear, or intimidation.

In this case, the church's decision to proceed with a reconciliation-based approach (a Matthew 18-style meeting) without evidence of further coordination with Children and Youth Services regarding safety planning or investigative boundaries introduced avoidable risks. From an investigative standpoint, this reflects a procedural gap between pastoral care and child protection practices. Having sought assistance from the Director of Children and Youth Services regarding suspected child abuse, subsequent actions would have been better coordinated in a manner that supported, rather than potentially complicated, the child protection process. This decision

underscores the need for clearer institutional guidelines to ensure that, when allegations of child abuse are disclosed or reported, subsequent actions align with established child-safety practices rather than solely with internal church-based processes.

9.4 Institutional Betrayal and Emotional Harm

With respect to institutional betrayal and emotional harm, Firefly concludes that the lack of direct communication with Roberts following GRACE's withdrawal in 2025 and during the subsequent Telios Law review resulted in significant and unnecessary harm. From a trauma-informed perspective, the lack of timely and consistent communication about the status of the investigative process removed essential elements of safety and predictability that are critical for individuals navigating ongoing trauma. Those communication failures continued when Telios Law commenced in 2026, as Roberts was neither notified that Telios Law had been engaged nor interviewed, despite her central role in the underlying allegations.

Roberts' exclusion from both the information flow and the Telios Law review compounded the emotional impact, reinforcing her reported feelings of invisibility, powerlessness, and uncertainty. This failure to include her or to keep her informed intensified the harm of institutional betrayal and left her without clarity on the status and direction of the church-authorized investigative process.

The initiation, termination, and redirection of the investigative process created instability that significantly eroded Roberts' trust in the institution's willingness to pursue accountability. The transition from GRACE to Telios Law occurred without timely communication to Roberts or her involvement in the subsequent review, resulting in a fragmented process that lacked continuity from her perspective. These disruptions also reflected shortcomings in organizational preparedness and raised concerns about whether the BIC U.S. had a unified strategy for addressing Roberts' allegations. For Roberts, the stop-and-start nature of the process contributed to ongoing uncertainty about whether the investigation was moving forward, who was responsible for it, and whether her allegations were being taken seriously.

Survivor Greta Roberts received an email containing the Telios Law report from Peter Guinther, BIC U.S. Human Resources Administrator, and Heather Beaty, BIC U.S. Susquehanna Conference Bishop, on June 18, 2026. In that correspondence, church leadership informed her, only after the Telios Law review had concluded, that they had continued to review her concerns following GRACE's withdrawal and had engaged Telios Law to conduct an assessment focused on the church's response. The email acknowledged that this was not a full third-party investigation and confirmed that Telios Law identified evidence of "some level of neglect, physical abuse, and emotional abuse." Guinther also added, "Please note that this was based on evidence that affirmatively came up, not a finding that what you alleged did not take place."

The fact that Telios Law reached findings regarding the underlying concerns and church response without notifying, interviewing, or otherwise involving Roberts underscores the procedural and trauma-informed deficiencies documented throughout this report. Receiving this

information only after the fact deprived Roberts of transparency and participation, elements essential to trauma-informed practice and maintaining trust in institutional processes.

Guinther further stated in his June 18, 2026, email, “For this, and for the impact of these painful occurrences which has endured throughout your lifetime, we are deeply grieved. As outlined in our policy, the findings are being reviewed by Leadership Council members and will be addressed with George Kibler.” While this communication acknowledged the impact of the reported abuse and expressed institutional grief, it occurred only after the Telios Law review had concluded and without Roberts having been informed of or invited to participate in that process.

These findings demonstrate a pattern in which institutional processes, communication failures, and the absence of trauma-informed practices compounded the harm experienced by Survivor Greta Roberts. While certain actions taken by individuals in authority during the original response in the late 1970s were consistent with the legal requirements applicable to them at the time, the broader institutional response in 2025–2026 lacked the transparency, support, and survivor-centered engagement necessary to avoid additional harm. The lack of clear and consistent communication, particularly throughout the 2025–2026 investigative process, undermined Roberts’ trust and reinforced the dynamics of institutional betrayal that such inquiries are intended to address.

These conclusions highlight the need for consistent policies, trauma-informed protocols, and accountability structures that prioritize survivor safety, autonomy, and well-being at every stage of the investigative process.

10. Recommendations Summary for BIC U.S. Leadership

This summary outlines key recommendations designed to strengthen child protection practices, improve trauma-informed communication, address additional allegations identified during the investigation, and reinforce institutional accountability. These recommendations build upon existing reforms while identifying areas where further action is necessary to ensure safety, transparency, and trust across the denomination.

10.1 Survivor Care and Acknowledgment of Harm

Beyond strengthening future safeguarding practices, Firefly recommends that BIC U.S. take meaningful steps to acknowledge and respond to the harm experienced by individuals whose disclosures and treatment were the subject of this investigation. Trauma-informed organizational practice recognizes that accountability includes not only preventing future harm but also addressing the impact of past actions on those who were affected.

Based on the findings of this review, Firefly recommends that BIC U.S. consider the following survivor-care measures:

- Acknowledgment of Harm - BIC U.S. should formally acknowledge the abuse experienced by Greta Roberts, the limitations in its response to her disclosures, and the ways in which its actions over the past year and a half contributed to additional trauma. Acknowledgment is a foundational component of trauma-informed care and signals institutional responsibility.
- Direct Communication with the Survivor - Any communication should be survivor-led, respectful, and paced according to the survivor's preferences. BIC U.S. should ensure that any outreach is grounded in transparency, empathy, and respect for the survivor's autonomy.
- Restorative Engagement - BIC U.S. may consider restorative steps such as offering a facilitated conversation, providing a written acknowledgment, or engaging in a process that allows the survivor to articulate what repair would look like for her. Participation should be voluntary and structured to avoid retraumatization.
- Access to Support Resources - BIC U.S. should ensure that survivors have access to appropriate support, which may include counseling resources, pastoral care delivered in a trauma-informed manner, or other forms of assistance identified by the survivor. Institutional Reflection and Learning - BIC U.S. should reflect internally on the findings of this investigation, including how its past responses affected the survivor and what changes are needed to ensure future interactions with survivors are grounded in compassion, accountability, and trauma-informed practice.
- Institutional Reflection and Learning - BIC U.S. should engage in internal reflection and confession regarding the findings of this investigation, including how its past responses affected the survivor and what changes are needed to ensure that future interactions with survivors are grounded in compassion, accountability, and trauma-informed practices.

These recommendations support both organizational accountability and survivor healing. They reflect trauma-informed principles and the specific findings of this investigation, while recognizing that any survivor-care process must be shaped by the survivor's preferences and boundaries. These recommendations include direct communication with the survivor, restorative engagement, and access to Support Resources.

10.2 Strengthen Child Protection and Reporting Protocols

BIC U.S. should adopt a denomination-wide child protection framework that establishes clear, non-negotiable expectations for reporting suspected abuse. This includes:

- A unified abuse-reporting policy applicable to all clergy, staff, volunteers, and ministry leaders, regardless of whether an individual is legally classified as a mandated reporter.
- Immediate reporting of suspected child abuse to appropriate civil authorities, without internal investigation, reconciliation, or other church processes substituting for or delaying the report.
- Standardized documentation procedures for disclosures, reports, and follow-up actions.
- Annual child protection and reporting training for all credentialed leaders and other individuals with responsibility for children and youth.

- A centralized safeguarding resource staffed by trained personnel to assist pastors, staff, and volunteers with reporting requirements and protective measures, while making clear that contacting the resource does not replace or delay required reports to civil authorities.

10.3 Implement Trauma-Informed Communication Practices

To reduce the risk of additional harm and institutional betrayal, BIC U.S. should adopt clear communication protocols for survivors who engage with church-authorized investigations. Key steps include:

- Timely notification to survivors when an investigation begins, pauses, resumes, changes investigators or investigative organizations, or concludes.
- Survivor-directed participation options that respect individual safety and agency.
- Established communication intervals for providing status updates, including when there are no substantive investigative developments.
- Access to independent, trauma-informed support services.
- Trauma-informed training for bishops, pastors, denominational leaders, and individuals responsible for overseeing or communicating about investigations.

10.4 Commission an Independent Investigation of Additional Historical Allegations

The additional allegations identified during this investigation warrant a separate, independent third-party investigation. The investigation should examine both the underlying allegations and the institutional response to disclosures reportedly made to church leadership. Recommended actions include:

- Engage a qualified third-party investigative organization with a clearly defined mandate, independence from BIC U.S. leadership, and documented terms of reference.
- Examine the historical institutional response, including what church or denominational leaders knew, what actions were taken, whether reports were made to civil authorities, and whether systemic factors affected the handling of abuse disclosures.
- Provide individuals who reported these historical allegations an opportunity to participate in the investigation and establish clear communication protocols regarding the investigation's scope, status, and conclusion.

10.5 Enhance Institutional Accountability and Transparency

To strengthen public trust and demonstrate ongoing commitment to safeguarding, BIC U.S. should adopt the following accountability measures:

- Publish an annual safeguarding report summarizing training, aggregate reporting activity, policy updates, and compliance metrics while protecting survivor confidentiality and personally identifiable information.
- Issue a public safeguarding statement outlining commitments to reporting, transparency, and independent review.
- Engage an external safeguarding professional or organization every two to three years to audit policies, training, compliance, and case-handling practices.
- Prohibit reconciliation, mediation, or Matthew 18-style meetings involving alleged perpetrators and survivors or affected family members while an abuse report or investigation is pending, unless such contact has been determined to be safe and appropriate in coordination with the relevant civil authorities and with the informed consent of the survivor.
- Require clergy to complete safeguarding training as part of credentialing and renewal processes.
- Establish a board-level safeguarding committee, or equivalent independent oversight structure, with responsibility for monitoring policy compliance, reviewing institutional responses to allegations, and ensuring accountability for corrective actions.
- Require documented transition protocols when an independent investigation is terminated, transferred, or reassigned, including responsibility for survivor notification, preservation and transfer of investigative materials, continuity of communication, and documentation of decisions regarding the scope of any successor review.

11. Concluding Statement

This independent investigation was conducted to assess the Carlisle Brethren in Christ Church's institutional response to concerns involving potential emotional misconduct, institutional betrayal, and failures to fulfill child-abuse reporting obligations. The findings reflect the evidence available at the time of the review and are grounded in trauma-informed investigative standards that prioritize survivor safety, autonomy, and well-being. The conclusions are intended to support accurate understanding, accountability, and informed decision-making by the parties responsible for institutional governance and child protection compliance.

11.1 Limitations of the Investigation

The conclusions in this report are based on the information provided to Firefly during the investigative period. Several factors may limit the completeness of the findings, including witness availability, the accuracy of recollections, the absence of contemporaneous documentation, and the scope defined by the Investigator Services Agreement. These limitations do not negate the findings but should be considered when evaluating the overall context and institutional response.

11.2 Investigator's Certification

I certify that this investigation was conducted independently, objectively, and in accordance with the trauma-informed protocols and professional standards outlined in the Investigator Services Agreement dated April 27, 2026. All findings and conclusions are based on the evidence reviewed, interviews conducted, and materials made available to Firefly during this investigation.

Jim Holler, Executive Director, Firefly ISAI:  Date: 10/09/26

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12. Appendix

Appendix A - Historical Development of Pennsylvania's Mandatory Reporting Laws (1963-1995)

Appendix B – Definitions, Standards, and Trauma-Informed Principles

Appendix C – Source Documents & Supporting Materials

Appendix A: Historical Development of Pennsylvania's Mandatory Reporting Laws (1963–1995)

Overview

This appendix provides historical context for Pennsylvania's Child Protective Services Law (CPSL), emphasizing the statutory framework in place during the 1970s. This background is relevant to understanding institutional responses to child abuse during the period in which the survivor's disclosures occurred. The summary below draws on statutory history and the Villanova Law Review article by Leonard G. Brown III and Kevin Gallagher, Mandatory Reporting of Abuse: A Historical Perspective on the Evolution of States' Current Mandatory Reporting Laws with a Review of the Laws in the Commonwealth of Pennsylvania (2014). https://digitalcommons.law.villanova.edu/cgi/viewcontent.cgi?article=3262&context=vlr

1. Pennsylvania's First Mandatory Reporting Statute (1963)

Pennsylvania enacted its first mandatory reporting law in 1963 following national concern generated by the 1962 *Battered Child Syndrome* research. At that time:

- Mandated reporters consisted solely of physicians.
- The law required physicians to report suspected abuse to authorities but did not include teachers, law enforcement, social workers, clergy, or other professionals.
- Pennsylvania's scope was significantly narrower than many states, which were already expanding reporting obligations to additional child-serving professionals.

This limited statutory framework remained in place for more than a decade.

2. Expansion of Mandatory Reporting: Act of October 7, 1975 (P.L. 911, No. 168)

In 1975, Pennsylvania enacted a major expansion of its mandatory reporting obligations. The amendment broadened the categories of professionals required to report suspected child abuse. According to Brown & Gallagher's historical analysis, the 1975 law added:

- Coroners
- Dentists
- School officials
- Social service agencies
- Day care providers
- Law enforcement officers

Notably, the 1975 statute did not include clergy.

Legislative Intent (1975)

Brown & Gallagher describe the 1975 expansion as an effort to address concerns that abuse was being missed by professionals who regularly interacted with children. The legislature also strengthened penalties for failure to report, signaling a shift toward accountability and public protection.

Relevance to Historical Investigations

During the late 1970s, Pennsylvania's mandatory reporting law applied only to the professional categories listed above. Clergy, pastoral staff, and religious workers were not mandated reporters under Pennsylvania law at that time. This historical reality is essential context for evaluating institutional responses to abuse disclosures during that era.

3. Addition of Clergy as Mandated Reporters (1995 Amendment)

Pennsylvania added clergy to the list of mandated reporters in 1995 through amendments effective July 1, 1995. The revised statute required clergy to report suspected abuse when they had reasonable cause to suspect maltreatment.

The amendment included a narrow exception for confidential communications made to an ordained clergy member but clarified that privileged communication could not be used to avoid reporting child abuse. Brown & Gallagher situate this change within a national trend of expanding mandatory reporting obligations following high-profile institutional abuse cases.

4. Application for This Investigation

Understanding the statutory framework in place during the 1970s is essential for evaluating institutional responsibility. At the time of the survivor's disclosures:

- Pennsylvania law did not require clergy or church personnel to report suspected abuse.
- Reporting obligations applied only to the limited professional categories listed in the 1975 statute.
- Institutional failures must therefore be assessed not only against statutory requirements but also against ethical duties, organizational policies, and trauma-informed best practices, which extend beyond legal minimums.

Appendix B — Definitions, Standards, and Trauma-Informed Principles

Overview

This appendix defines key terms used throughout the report, along with the trauma-informed standards that guided the investigative process. These definitions ensure clarity, consistency, and transparency in how this investigation understands concepts related to child protection, institutional response, and survivor experience.

1. Key Definitions

1.1 Child Abuse

For purposes of this agreement, "child abuse" shall have the meaning assigned in 23 Pa Cons. Stat. 3303, which states:, "child abuse" is defined as intentionally, knowingly, or recklessly doing any of the following: Causing bodily injury to a child through any recent act or failure to act. Fabricating, feigning, or intentionally exaggerating or inducing a medical symptom or disease which results in a potentially harmful medical evaluation or treatment to the child through any recent act. Causing or substantially contributing to serious mental injury to a child through any act or failure to act or a series of such acts or failures to act. Causing sexual abuse or exploitation of a child through any act or failure to act. Creating a reasonable likelihood of bodily injury to a child through any recent act or failure to act. Creating a likelihood of sexual abuse or exploitation of a child through any recent act or failure to act. Causing serious physical neglect of a child. Engaging in any of the following recent acts: Kicking, biting, throwing, burning, stabbing or cutting a child in a manner that endangers the child. Unreasonably restraining or confining a child, based on consideration of the method, location, or the duration of the restraint or confinement. Forcefully shaking a child under one year of age. Forcefully slapping or otherwise striking a child under one year of age. Interfering with the breathing of a child. Causing a child to be present at a location while a violation of 18 Pa.C.S. 7508.2 (relating to operation of methamphetamine laboratory) is occurring, provided that the violation is being investigated by law enforcement. Leaving a child unsupervised with an individual, other than the child's parent, who the actor knows or reasonably should have known: Is required to register as a Tier Il or Tier HI sexual offender under 42 Pa.C.S. Ch. 97 Subch. H (relating to registration of sexual offenders), where the victim of the sexual offense was under 18 years of age when the crime was committed. Has been determined to be a sexually violent predator under 42 Pa.C.S. 9799.24 (relating to assessments) or any of its predecessors. Has been determined to be a sexually violent delinquent child as defined in 42 Pa.C.S. 9799.12 (relating to definitions). Has been determined to be a sexually violent predator under 42 Pa.C.S. 9.58 (relating to assessments) or has to register for life under 42 Pa.C.S. 9799.55 (b) (relating to registration). Causing the death of the child through any act or failure to act. Engaging a child in a severe form of trafficking in persons or sex trafficking, as those terms are defined under Section 103 of the Trafficking Victims Protection Act of 2000 (114 Stat. 1466, 22 U.S.C. 7102).

1.2 Disclosure

A “disclosure” is any instance in which a survivor communicates, verbally, in writing, or through behavior that abuse occurred. Disclosures may be partial, indirect, fragmented, or delayed. Trauma research confirms that delayed disclosure is common and should never be interpreted as evidence of fabrication.

1.3 Institutional Response

“Institutional response” refers to any action an organization or its representatives take upon receiving information or suspicion of abuse. This includes reporting, documentation, communication, pastoral care, supervision, and protective measures.

1.4 Reasonable Suspicion

“Reasonable suspicion” is a standard used in child protection contexts indicating that a person, based on training, experience, or observation, has cause to believe a child may be abused. It does not require proof, investigation, or certainty.

1.5 Mandated Reporter

A “mandated reporter” is an individual legally required to report suspected child abuse. Mandated reporter categories vary by state and era. As detailed in Appendix A, clergy were not mandated reporters in Pennsylvania until 1995.

2. Trauma-Informed Standards

2.1 SAMHSA’s Six Principles of Trauma-Informed Care

This investigation was guided by the six principles established by the Substance Abuse and Mental Health Services Administration (SAMHSA):

- Safety - Ensuring physical and emotional safety for survivors.
- Trustworthiness & Transparency - Clear communication and predictable processes.
- Peer Support - Respecting survivor communities and shared experiences.
- Collaboration & Mutuality - Working alongside survivors rather than imposing authority.
- Empowerment, Voice & Choice - Centering survivor autonomy and agency.
- Cultural, Historical & Gender Considerations - Recognizing the impact of identity, context, and systemic harm.

www.samhsa.gov/resource/dbhis/infographic-6-guiding-principles-trauma-informed-approach

3. Firefly's Trauma-Informed Investigative Approach

3.1 Survivor-Centered Engagement

The investigative process prioritizes survivor dignity, autonomy, and emotional safety. This includes allowing survivors to set the pace of interviews, choose communication methods, and define boundaries.

3.2 Avoidance of Re-Traumatization

Investigators avoid practices that may replicate dynamics of harm, including coercion, disbelief, minimization, or pressure to recount traumatic events in detail.

3.3 Ethical Standards Beyond Legal Minimums

Even when historical laws did not require reporting (e.g., clergy in 1975), ethical obligations to protect children and respond appropriately to disclosures remain paramount.

Appendix C — Source Documents & Supporting Materials

This appendix contains the documents reviewed or referenced during the investigation. Materials are grouped by categories for clarity. Copies of each document appear in the order listed below.

C.1 Survivor-Provided Documents

- **Survivor's Victim Impact Statement**

C.2 Source Documents

- Initial response email(s) from BIC U.S.
- Follow-up communications between Firefly, BIC U.S., and the Survivor
- Relevant policy documents
- Historical church documents supplied by BIC U.S.

C.3 External Standards & Professional Materials

- Telios Report

C.4 Firefly Administrative Materials

- Firefly ISAI contract with Survivor Greta Roberts

C.1 Survivor-Provided Documents

Survivor's Victim Impact Statement

Victim Impact Statement

My name is Greta Roberts. I am writing this Victim Impact Statement to describe the profound and lasting harm caused by the retraumatization I've experienced during my interactions with GRACE.

This statement is my attempt to reclaim my voice—to name the institutional betrayal I have endured and to document the emotional, psychological, and spiritual toll of being silenced, ignored, and harmed again—this time under the pretense of justice.

Background

1960–1977: A Childhood of Daily Terror

Since birth, I have woken up every day in fear. My home was a place of constant threat—filled with belittlement and beatings. I was punished without explanation. The terror was so pervasive that, even now, I often can't breathe. I still suffer panic attacks.

1977: I Plead for Help from My Pastor and Church —and Am Betrayed

At 17, I made the terrifying decision to speak out. I disclosed to my Brethren in Christ (BIC) pastor that my missionary parents—leaders within the church—had been abusing us for our entire lives.

I asked him to help protect my younger siblings as I left for college. He did nothing. There was no one else to turn to. I saved myself, but my siblings were left behind, and the abuse continued. I carry deep guilt for that.

1978–2025: Years of Therapy

I spent decades in therapy trying to undo the damage. I had to learn that I was allowed to go to college. That I was right to tell the truth. That my voice mattered.

I also came to understand something even more devastating: that the Church's refusal to act—its failure to protect my siblings—likely contributed to the death of my little sister. That truth is unbearable. And it is permanent.

2025: I Reach Out to the BIC Church Again

After 47 years, I found the strength to reach out once more—this time to Tom Law, the Chairman of the Board of the BIC Church. I told him my story and asked for an apology. Something simple. Human.

Like before, the Church did nothing. I was brushed off, dismissed, and sent in circles. Eventually, they hired GRACE to conduct an "independent" investigation.

2025: GRACE Contacts Me

GRACE reaches out and tells me they have a signed contract with the Brethren in Christ Church to conduct an investigation. I am immediately petrified. My heart races. My body remembers.

I am slow to trust—how could I not be? But I desperately want to believe in the possibility of justice. I ask directly whether this will truly be an independent investigation. Robert assures me:

> *"I absolutely say this is an independent investigation. We do have an engagement agreement with the Brethren in Christ Church and even though they've hired us to come in and do this work, there are provisions in our contract with them that maintain our independence."*
> *— Robert*

I want to believe him. I choose to believe him. So I do what survivors are rarely safe enough to do: I open the vault. I send GRACE everything—decades of trauma laid bare. Every private, personal email. Every document. Every single piece of correspondence I've saved over 47 years.

Sending it makes me feel raw, exposed, and terrified. But I do it anyway, because I believe telling the truth matters. Because I believe they will listen.

Because I still believe justice might be possible.

June 10, 2025: My Difficult Interview with GRACE

GRACE interviews me in person for nearly five hours. There is no formal break. No lunch. No pause for reflection. By the end, I am wiped out. Hollowed. Used up.

What unfolds in that room is not care. It is not trauma-informed. It is a replay of past violations—only this time under the banner of "justice." Throughout the interview, my abuse is referred to as *"discipline," "corporal punishment,"* and *"physical punishment."*

I am asked:

> *"What kind of behavior from me warranted physical punishment?"*

That question breaks something in me. It reframes my abuse as deserved. It implies I was responsible for the abuse. I am reeling.

GRACE's investigators seem fixated on the abuse I suffered at home — obsessively focused on my parents. They drill into it, detail after detail. Yes, my parents' abuse was horrific. But it is only part of what happened.

The real investigation was supposed to ask (per the Scope of Work):

- Did my parents abuse us? (Evidence for the rest of the investigation).
- Did my pastor fail to protect my siblings when asked or report the abuse?
- Why did the Church continue to elevate and protect known abusers?

Instead, GRACE spends nearly triple the time pressing into the abuse itself, rather than the institutional betrayal that allowed it to continue. The imbalance is not just painful—it is retraumatizing. I came seeking accountability for systemic failure. What I got was interrogation.

In Person Interview 6/10/25	
Questions Related to...	**Combined Time**
Parent's Abuse	2 hours (1 hour 57 mins)
Ken Hoke Questions	21.1 minutes
Church Questions	24.3 minutes

GRACE Conducts the Wrong Investigation

As the interview continues, it becomes painfully clear: GRACE is not investigating what they said they were asked to do.

The focus is almost entirely on whether my parents abused me. That's not in dispute. The real harm—the **institutional betrayal**—is being ignored. GRACE rarely asks about my pastor or the church. The betrayal that changed the course of my life is treated as an afterthought.

My Pleas Are Ignored

After the video camera is turned off, I'm told that GRACE plans to interview my siblings. I freeze. I've already pleaded with them—more than once—not to do this. I've explained that involving my siblings could bring emotional harm to me, possibly even physical danger. I've tried to set boundaries. I've been clear.

But instead of affirming that they will honor my safety, the investigators give me soft phrases:

- "We hear you."
- "We're noting your preference."
- "We'll talk to leadership and let you know."

I am dismissed - - cloaked in politeness. I tried to make it clear:

> *"My brother? Oh. No. No. Okay. No. He just scares me. He just scares me. I think there's enough evidence without talking to him. I really do."*
> *— Greta*

And still, there is no commitment. No reassurance. No action to protect me. I opened myself up. I told the truth. I made myself vulnerable. And once again, I was met with institutional silence dressed up as procedure.

There Was Never a Need to Re-Prove the Abuse

I know there is enough evidence to substantiate the abuse. I had already

provided it. My father himself admitted to it — in writing — after finally beginning to remember what he had done.

Here is just one example, taken directly from an email he sent me and forwarded to GRACE:

> *"I do remember several occasions of severe physical spankings of someone for which I take full responsibility. I'm so very sorry for the abuse and neglect you experienced from me or at my hands. Of course there is no way for [your] mother to express her failures, abusive actions or neglects? (She is dead)." — George Kibler*

This is not vague. This is not disputed. The abuse happened. It was admitted. It does not require deep, obsessive investigation. Yet GRACE centered their investigation on whether my parents abused me—something already proven — instead of focusing on the **full** Scope of Work:

Every moment spent trying to re-confirm what seems obvious feels like a dismissal. A delay tactic. A way to not ask more questions about my BIC Pastor and the BIC Church. This investigation does not seem independent.

GRACE Refuses to Answer my Most Terrifying Questions

On June 12th, I sent an email to Robert at GRACE, detailing my deep concerns about how the interview had been handled. I also asked for two crucial clarifications:

1. **Are they going to interview my siblings?**
2. **Where should other BIC abuse victims go to report their experiences, as stated in Point 2 of the Scope of Work?**

I had already asked these questions in the interview as well. The investigators could not answer it. I was left feeling exposed and confused—not just for myself, but for other survivors I know are watching this process.

As of today August 6th, I still have not received a response. Two full months of silence. Two months of spiraling fear, unanswered questions, and sleepless nights filled with nightmares.

This silence is not neutral. It is devastating. It communicates that my safety, my voice, and my truth are not priorities.

I reached out again on **July 10th**, pleading once more for clarity about whether GRACE would be contacting my siblings. I used the word *desperate*—because that is what I was. What I still am. I am begging for answers about something that could put me in harm's way. And I am met with no response, no urgency. I am not a priority.

July 23rd: A Vague Email Triggers a Trauma Spiral

On July 23rd, I received an email from Robert — two weeks after my desperate outreach. It includes this line:

> *"My impression is that you and GRACE align on the importance of transparency even in hard things. Some of what I will share may be difficult to process..." — Robert*

He ends the email with this:

> *"I am out of office this week but Emily could work to schedule a discussion when I return if that is preferred." — Robert*

There is no explanation about what the hard things are. No clarity about what might be hard for me to process. Just a vague warning that something difficult is coming, and the announcement that he's now unavailable.

I go into a panic.
Without details, my brain begins filling in the blanks — imagining what the "hard things" might be.

This is what abused children do. We try to prepare for impact.
I become convinced I've done something wrong. That I've made things worse. That punishment is coming.

I consider calling Robert — needing reassurance, grounding, anything — but his message says he is unreachable for the rest of the week.

I am left alone with my spiraling fear.
GRACE's silence, vagueness, and absence become their own form of violence.

GRACE Becomes the Perpetrator

After reading Robert's vague and unsettling email, I break. I call my Victim's Advocates in tears, asking what I've done wrong. I'm crying and afraid. I beg them to help me understand what the "bad news" could be. I am petrified — consumed by a fear I've known my whole life.

In an instant, I am a child again. Powerless. Bracing for harm.

Once again, someone is placing vague "hard things" at my feet without giving me the truth. Once again, someone is saying they value transparency, while withholding information and becoming unreachable. It feels manipulative. It feels like a game.

GRACE has become the perpetrator.

The trauma has overtaken my body. I can no longer open GRACE's emails. I physically cannot read them. I can no longer speak with GRACE — at least not right now. The emotional and psychological toll is too high.

I ask my Victim's Advocates to step in — to read GRACE's messages, and to relay my messages on my behalf — because I am too afraid.

This is what institutional betrayal does.
This is what retraumatization looks like.

GRACE Denies My Trauma-Informed Request for Safety

On July 23, my Victim's Advocates kindly agreed to help me communicate with GRACE while I recover. They emailed Robert on my behalf, letting him know I had asked them to act as a go-between.

Shortly after, I personally confirmed with Robert that I had given full permission for my advocates to handle relaying communications until I felt emotionally strong enough to re-engage.

On July 31, Robert replied:

> *"...we need to be transparent that we cannot honor this request to delegate our communication through your advocates, or respond to their communication without your involvement." — Robert*

I am given the option to stop my involvement in this investigation or throw my safety aside and directly communicate with GRACE. I'm beginning to believe GRACE wants me to pull out of the investigation. But I won't. Justice is too important to me.

We had never asked GRACE to communicate "without my involvement." My Victim's Advocates were simply relaying messages from me, with my full consent, during a time of extreme trauma. Every word they sent was based on deep, ongoing conversations with me.

Robert's response dismissed my lived experience. It denied my voice. It rejected my right to protect myself.

This request — to temporarily communicate through trusted advocates — is fundamental to any trauma-informed process. GRACE's refusal made one thing painfully clear: their process was not created with survivors in mind.

They refused to accommodate even the most basic, reasonable request for safety.

And now I don't know how to proceed.

Summary

What began as a glimmer of hope for institutional accountability with the BIC Church has instead become a second site of harm. I agreed to work with GRACE believing—desperately hoping—that their process would be different. That this time, the harm I endured as a child would be met with independence, care, truth-telling, and justice.

Instead, I was retraumatized.

I was subjected to vague communication, silence in the face of urgent questions, and an investigative process that centered the wrong thing: whether abuse happened, rather than how the Church failed to act when I disclosed it.

I was asked what I did to deserve the abuse. I was forced to re-prove what my father had already admitted to in writing. I was dismissed when I pleaded not to have my siblings contacted—a request that should have been respected without question. And when the emotional toll became unbearable, I was denied the right to use my Victim's Advocates as a temporary line of communication—a trauma-informed accommodation that any competent, survivor-centered process would have granted without hesitation.

GRACE's actions mirrored the same institutional patterns that harmed me in childhood: minimizing abuse, silencing victims, and prioritizing control over care.

This process has cost me months of panic, nightmares, regression, and despair. It has damaged my faith—not just in the Church, but in those who claim to stand for survivors.

And yet—I am not beaten. I want justice to prevail. I want the investigation to continue. I believe accountability still matters.

But I need the process to reflect the values GRACE claims to uphold—fairness, independence, and trauma-informed care. These are the very principles GRACE promotes on its website. I am simply asking that they be lived out in practice.

I came forward in truth. I still stand in truth. And I remain committed to a process that does not harm those it was designed to protect.

I am telling the truth. I have always told the truth. And I will continue to speak it, no matter how many doors are closed in my face.

Because the next survivor who comes forward deserves better than this. We all do.

C.2 Source Documents

From: **Guinther, Peter** [redacted]
Date: Thu, Jun 18, 2026 at 9:29 AM
Subject: Sharing Statement of Findings
To: Greta Roberts <[redacted]
CC: Beaty, Heather [redacted]

Hello Greta,

Bishop Beaty and I are writing to inform you of actions taken by BIC U.S. in relation to the concerns you submitted for review. In recent months, BIC U.S. continued to review the concerns outlined in your letter, "Justice for Greta," following the termination of the investigation by GRACE (Godly Response to Abuse in Christian Environments). We realized that though the investigation could not be continued in accordance with GRACE's standards, the concerns still remained and needed to be further addressed, particularly with respect to the actions of BIC church leaders at the time. BIC U.S. has been working with attorney, Theresa Sidebotham, of Telios Law to conduct further interviews and an assessment based on the concerns you stated in your letter, as well as in the email, "A Survivor Breaks her Silence at the BIC Church."

While this was not a full third-party investigation, but an assessment focused primarily on church response, Telios Law affirmed in its findings that some level of neglect, physical abuse, and emotional abuse took place (Please note that this was based on evidence that affirmatively came up, not a finding that what you alleged did not take place). For this, and for the impact of these painful occurrences which has endured throughout your lifetime, we are deeply grieved. As outlined in our policy, the findings are being reviewed by Leadership Council members and will be addressed with George Kibler.

The findings from Telios Law also indicate that, although Ken Hoke was not legally a mandatory reporter at the time you shared your concerns in the late 1970's, he did take appropriate steps to address the concerns, given the standards of the day. Pastor Ken consulted with Child and Youth Services leadership, and church leaders also took up the responsibility for follow-up on your concerns. This included arranging a place for you to live. While expectations and procedures have changed since then, this would have been considered appropriate action for the church at that time. We are grieved that neither secular law nor actions of the church were fully adequate to resolve your family situation at that time.

Since then, just as laws have been altered in order to better protect children, we too have been working to improve in this area. BIC U.S. has taken several steps to better prevent and respond to such situations.

1. BIC U.S. revised language in the Congregational Governance section of the Manual of Doctrine and Government to include provisions for handling allegations against pastoral staff of misconduct including prompt notification of the Bishop, and the requirement to report alleged misconduct to applicable governmental agencies as required by law.
2. Candidates for first-time credentialing and renewal of credentials with BIC U.S. go through a pastoral screening process, including background checks.
3. BIC U.S. World Missions has put in place a separate Child Safety and Protection Policy, developed under the guidance of the Child Safety Protection Network (CSPN), especially focused on caring for children in overseas BIC U.S. contexts. Every missionary goes through child safety and reporting training before deployment and follow-up training while in service. A Child Safety Officer and team have been appointed for addressing any reported concerns.
4. Since 2013, BIC U.S. World Missions has had a Member Care Administrator for its missionaries and recently hired a new Member Care Administrator who specializes in Third-Culture Kids' (TCKs) issues. This role includes debriefs with missionary children while on the field and during home ministry. We also routinely send missionary families to third party organizations for formal debriefs for both the adult missionaries and any children of the adult missionaries.
5. BIC U.S. developed a new Ministerial Misconduct Policy and Procedures under the guidance of Godly Response to Abuse in Christian Environments (GRACE), and we have trained Response Team members to address local congregational situations not requiring external investigative organizations. Both GRACE and Telios Law curriculum are incorporated into this trauma-informed training.
6. BIC U.S. leadership has received training on recognizing and responding to abuse in the Church context.
7. BIC U.S. continues to develop and implement new educational programs and training for pastors in the areas of abuse and trauma-informed care.

While the steps that we have taken in recent years do not change what you have experienced in the past, we know that part of your concern is for other children and do hope that it shows that we are trying to improve as a community in this area. We will continue to try to improve and keep current with best practices. Please find attached the statement of findings from Telios Law.

Peter Guinther
Human Resources Administrator

Heather Beaty
Susquehanna Conference Bishop

Brethren in Christ U.S.
431 Grantham Road
Mechanicsburg, PA 17055

[redacted]

From: Guinther, Peter [redacted]
Sent: Monday, August 10, 2026 9:48 AM
To: Jim Holler [redacted]
Cc: Robinson, Alan [redacted]
Subject: RE: Follow-up questions

Good morning, Jim,

Thank you for your patience in waiting for a response. I am able to primarily address your first question regarding "formal or informal child protection policies in place within BIC U.S." between 1978 and 2025, though the resources available to me date back only to 1993. I will defer to Alan regarding your second question, as he has greater familiarity with that situation.

The earliest resource I have available regarding child protection policies within the BIC U.S. is the "BIC Guidelines for Pastors and Congregational Leaders" (1993). While these guidelines do not specifically address child protection, they provide direction for responding to sinful sexual behavior by church leaders, including: definitions, principles, procedures, assessment of accusations, response to church leaders and others involved, counseling and confession.

Child protection became a more formal focus within the BIC in 2002, soon after the Jerry Sandusky situation at Penn State became public. Brethren in Christ U.S. Leadership Counsel educated and requested local congregations in developing local policies and procedures for Child Safeguarding, and the Bishops followed up on their implementation. Leadership Council minutes from May 2003 ask the question of how congregations are doing with their sexual abuse policies, with bishops tasked to continue tracking progress and provide assistance where needed. Good responses had been received from Churches regarding the Preventing Child Abuse manual that was sent to them. Today, local congregations continue to develop their own Child Safeguarding policies with the assistance of such organizations as Safe Church, Protect My Ministry, GRACE, Brotherhood Mutual, and Child Safeguarding professionals within their congregations.

I trust this information is beneficial to understanding what structures were, or were not, in place through these years.

Peter Guinther
Human Resources Administrator

Brethren in Christ U.S.
431 Grantham Road
Mechanicsburg, PA 17055

[redacted]

---------- Forwarded message ---------
From: [redacted]
Date: Sat, Mar 1, 2025 at 3:52 PM
Subject: RE: Catching up
To: [redacted]

Hi Greta,

Thanks for your response. I would have to agree that you did everything that you could think of as a child and young adult to try to remedy an awful situation. I am sorry that so many of us failed to grasp the gravity of the situation and that we failed you. Yes, I do include myself in that failure. I hope you can forgive me for that.

Again, I hope that despite everything you are able to find peace and justice.

Blessings,

Stan

From: **Greta Roberts** [redacted]
Date: Sat, May 28, 2022 at 11:20 AM
Subject: Stuff
To: [redacted]

Dear Ken,

This email to you has been decades in the making. Today is the day I'm speaking out.

I am happily married and live on a rescue farm in NH after a long life selling software. I've done well. I'm remarkably happy. I'm also retired which gives me some time to put things right that I've been carrying with me all my life. I'm also estranged from my entire family that continues to struggle with past truths.

47 years ago or so, (1977 / 78) I came to you to let you know that my parents were physically and mentally abusing me and my siblings - very very badly. I asked for your help in seeing if we could be taken away by the state. I knew this was a dramatic request, (what would make any sane child ask this?) but I needed to get someone's attention. Horrible things were happening. I was willing to take our chances with a new set of parents rather than stay with the ones we had. Maybe I asked the wrong thing - maybe there were other things to do to help with the abuse. I didn't know. I was a kid.

We had come back from Africa - being missionaries for the BIC Church 4 years prior, I didn't have many resources, I didn't know the systems in the states. I was a kid. And I had been in the BIC church for all those years. Certainly the church who spoke about love and gentleness and understanding would help. Right? I couldn't have been more wrong.

I was getting ready to go to Messiah College and knew I'd be leaving [redacted] and [redacted] alone with 2 monsters. I knew going to college was my only way out for me - but I couldn't figure out how to save [redacted] ([redacted] had already moved out). I was wracked with guilt that I would be leaving them there to fend for themselves.

You told me you spoke to social services and they told you that they "prefer to keep families together" at all costs. Then you dropped it. No more questions for me. No asking me if I was ok. No checking in a month later. No follow up with [redacted]. (I think I do remember you and a few people going and speaking to my mom and dad - which did nothing except make them more angry at us ---> more abuse).

You were the adult that I came to to ask for help. You didn't pursue this - at all. I guess it was ok to send us back to this abusive environment. You'd done your part by talking to social services. We kids were disposable.

Two people at the church did help me in ways that dramatically changed my life. Ivan and Stan Beachy. They let me live with Stan for a few months because I thought I was going insane. Literally going insane. I needed to move out to save myself. And again I left [redacted] and [redacted] in the "care" of monsters. I've done everything but fall on my face to them, thanking them. They saw it. They took action.

I've seen you many times since then. At church. At Messiah College. When I see you I remember asking you for help and you not helping. I wonder if you've ever wondered how we were.

As an update on the children in our family:

[redacted] is dead. She died homeless and addicted to alcohol and drugs. She died on a mattress pulled to the side of the road. None of us knew she was dead until the stench of her body was so strong that police investigated. We don't really know which day she died. She struggled her entire life due to her own choices, sure, but also because of the abuse she received at home. Maybe you were at her funeral. I don't remember. Dad planned a glorious funeral. Singing. A choir. A video of her giving her "testimony". It belied what was really happening to her. It was all a front to again look good.

Maybe you were at mom's funeral. None of us kids wanted to give a eulogy. No need to wonder why. I gave one because I'm "the good one" in the family. I let her and dad save face. It seemed like I adored her. I didn't. I hated her. If anyone listened closely they would see that I only talked about her relationship with dad. Nothing about what a good mom she was. She wasn't. I'm thrilled she is dead. The abuse stopped then.

Each of the Kibler children has experienced immeasurable ongoing trauma during their lives (I won't detail their stories as that's their story to tell / not tell).

My story? I developed a massive eating disorder around the time I was asking you for help. I continue to struggle with it despite so much work on myself in therapy. I asked mom and dad for help and they also turned a deaf ear. I learned to not expect anyone to love me and learned I was worthless. I have ongoing severe complex PTSD from their physical and mental abuse, from watching my sister die over the years, watching the rest of the family struggle, and hearing my dad say he can't remember abusing us. (Convenient).

Certainly, you weren't responsible for all of this. But there is blood on your hands and on the hands of the BIC Church. You were the adult I asked for help. You did nothing. I was credible. I was specific. I was smart. I was organized. I had details. I was willing to testify against my parents. You did nothing. The church did nothing. The beatings and mental torture continued for many years beyond that time leaving a lifetime of marks.

And, the BIC church loved them and gave them more to do. They were assigned to help plant churches at Eschol, they went back to Africa as lauded missionaries again, dad did amazing things with the Village. He now has a bridge named after him. "Kibler Bridge" - remembering abusers that the church allowed to thrive.

To add insult to injury, I was sent to a boarding school in Bulawayo where we were neglected and many were abused (not me because I learned to keep my mouth shut). But I could hear uncle [redacted] beating (not spanking, but beating) the boys while [redacted] washed our mouths out with soap. We were good kids. We were 8, 9, 10 years old. Some of us didn't talk to, or see our parents for almost a year. Perhaps we were acting out a little from being desperately sad, and alone and neglected. We were beaten - some of us again and again and again and again.

The BIC church taught me many things: the most important being that children don't matter, they are tools of their parents, you can do anything you want to them. I learned that all the talk about love and kindness is bunk. I learned that the church will not take action on child abuse and they will in fact cover it up and allow abusers to continue in the church in leadership positions.

So, what do I want?

I want you to own this severe error on your part. I don't want an "I'm sorry" -- that's easy, I want you to own it. No excuses like "it was a different time" . . . . you were the adult in the leadership role.

I don't want to hear from you as a pastor, or coach, or religious person. So if you can't separate that persona from you as a person I don't want to hear from you. I don't want your prayers or blessings.

More than anything I want to put the truth out there and let you know that I remember - and I'm angry.

Greta

On Sat, May 28, 2022 at 9:05 PM Kenneth Hoke [redacted] wrote:
Hi Greta,

Thanks so much for writing. I do except that what I was able to do or not do, was a failure from what you had asked me to do. I also realize that a large part of the failure was not doing something that protected [redacted] and [redacted]. I regret that you have carried anger about these things for all of these years. I desire that this process of writing may be a way for you and me to find some resolution.

I have read your letter several times today. It has helped me go back to the time you are speaking about in the early years of my ministry here in Carlisle. I would like to share a few things from my perspective.

Given your request, the first thing I did was go to a friend of mine in Carlisle who was the head of Children and Youth Services for Cumberland County. He was the source of the information I received that made it unlikely that they would remove the children from the home. I shared this information with you.

You then parenthetically remembered some people coming to the house. I do realize the end result of this made our coming more difficult for you and your siblings, but it was a way for us as the Church to acknowledge what had been told to us and confront your parents with this information. This did not prove to be a channel for change either.

We then took the approach which you experienced, which was to work through Ivan and Stan Beachy. They became the spokespersons for the Church in seeking to walk with you at this time. I am very grateful that this was indeed helpful to you personally, although very painful as you thought of [redacted] and [redacted].

The problem with this approach was that I became a background person, rather than a person who clearly expressed my concern and care for you. From your letter, I hear the deep pain I caused for you in this. I did not intend pain, but this was your experience. I truly regret this.

I can speak more to why it was decided that Ivan and Stan would work on this, rather than me, but that is not necessary for this conversation at this time.

I was part of something that added to the pain and rejection you felt. I accept that and receive your anger related to it. You may let it go and not carry it any further.

I am open to talk with you and carry this conversation further if that is desired.

Grace and Peace,

Ken Hoke

[redacted]

Two are better than one, because they have a good return for their labor: A cord of three strands is not easily broken. (Ecclesiastes 4:9,12)

Request for Justice and Accountability

Delivered to Tom Law, Board Chair
Brethren in Christ Church US

January 30, 2025

Presented by:
Greta Roberts

Support Team:
[redacted]
Pasha Roberts, Husband
Letta Cartlidge, Victim Advocate
Nathan Mueller, Victim Advocate

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Date: Thursday January 30, 2025

To: Tom Law, Board Chair

From: Greta Roberts

I can't fully express how significant—and terrifying—today is for me. I've carried this story for 47 years. Out of loyalty to the Brethren in Christ Church and my parents, I have never had the courage to share much of it with anyone—let alone someone as senior as you within the Church.

I have spoken about it, however, with countless therapists. Recurring dreams and nightmares haunt me. The past lingers, unresolved. A wrong was done, and it needs to be made right.

Today is a big step toward that. Thank you for listening. I believe this conversation will have a positive impact on the rest of my life.

Background

To help you understand what happened 47 years ago, I need to provide some context about my childhood. It will help explain why my experience with my BIC pastor has been so traumatic.

Thank you for your patience as I describe these details.

My parents, George and Rachel Kibler, are devoted members of the Brethren in Christ Church. My father founded and served as the president of Messiah Village (now Messiah Lifeways). Both my parents attended Messiah College, where they met. My father still lives at Messiah Village today. My mother has passed away.

Their faith and dedication to the Church shaped their entire lives. I was born in Zambia in 1960, just two years after they arrived as BIC missionaries. Evangelism was their mission, their passion, their priority.

Their work consumed them: preaching, building churches, baptizing, holding African babies, selling Christian books, teaching hygiene, constructing schools and hospitals, and traveling to remote villages to spread the gospel.

Raising their children to feel loved and safe was not part of that mission.

From a young age, I felt like an inconvenience. When I was just nine months old, I contracted polio. I lost the ability to move my legs. When I struggled to breathe, I was rushed to a hospital in Zimbabwe, where doctors placed me in an iron lung. It was uncertain whether I would live or die.

My mother was with me during the three to four months I was in the iron lung. My father never visited. His mission work took precedence. Even as an infant, I believe I sensed that I and my illness were an obstacle to my parents' higher calling.

As I grew, that feeling deepened. Being a normal child—needing attention, making mistakes, asking for love—interfered with their priorities. I was neglected, ignored, criticized, demeaned, and beaten. Not disciplined—beaten.

Both my mother and father took part in this cruel cycle. My father would come home from work, church meetings, or prayer groups. My mother would report how "bad" we had been. And then the punishment would begin.

We were sent to our rooms to wait. My father would storm in, rip off his leather belt, and beat us in a rage.

To the outside world, he was gentle, warm—a quiet man with a kind demeanor. At home, he was a violent, angry man who took his rage out on his children.

The abuse wasn't a phase. It happened in every mission home we lived in—at Macha Mission, Sikalongo Mission, Choma, and later in Carlisle, Pennsylvania, after we returned to the U.S. The abuse never stopped. It was simply how we lived. We knew nothing else.

The belt was his weapon of choice. To this day, if my husband unbuckles his belt, I instinctively flinch.

My Earliest Memory

One of my earliest memories is from our time at Macha Mission. My father was a respected leader—the "Bwana," the man in charge, "Mufundisi (Pastor) Kibler."

One evening, my parents, my sister, and I were in the hallway of our small missionary home. My mother had once again reported that my seven-year-old sister had done something deserving of punishment.

My father flew into a rage. He beat her, slapped her, screamed at her. She cowered in the corner, trying to escape. I stood at the other end of the hall, terrified. I was sure he was going to kill her.

I ran forward and stepped between them, trying to stop him. He shoved me aside and kept beating her, grabbing her by the hair, yelling.

I looked to my mother for help. She stood there, watching—with a satisfied smile.

At that moment, I realized I was on my own. It was parents against children.

My father justified his actions, saying God had told him to discipline us this way. The beatings were necessary to make us better children. I believed him completely.

And, that is my very first memory of being alive. I was five years old. My sister was seven.

I still wonder: What could a five-year-old have done to deserve such treatment? My brain replays that memory over and over, searching for an answer that does not exist.

Afterward, we all went to bed like nothing had happened. No comfort. No reassurance. No "I love you." Just silence.

The next morning, my parents woke early to continue their evangelizing. There was never an apology.

My siblings and I were never close. We rarely spoke of the abuse—actually we rarely spoke about anything. We were just trying to survive our own individual nightmares.

Another memory:

When I was eight, my father ran Choma Bookroom, a small religious bookstore. It was a good outreach opportunity for the Church—a way to evangelize.

I can picture the Bibles stacked neatly in the front, the framed pictures of Jesus on the walls, the religious books. My father was always busy, selling, answering questions, and spreading the gospel.

My sister and I often went with him to the store. One day, as always, we must have done something wrong.

Dad was furious. We were in the way again.

He ordered us to go outside, find tree branches, and bring them back—for him to beat us with.

We went behind the store, sobbing, searching for the right branches.

"This one will break."
"This one isn't big enough."
"This one won't hurt as much."

Imagine two little children, seven and ten years old, discussing which stick would hurt them more. Actively participating in this horrible beating ritual.

We returned to the breezeway, holding our branches, waiting for our father to come back and beat us.

We sat there, bracing ourselves, devastated by our father's betrayal. Wasn't he supposed to love us? All we saw was hatred and torment.

He would ask, "Why are you so bad? Why can't you be good?"

I never had an answer. How do you answer that question from your father? I grew to believe I was inherently sinful—that I deserved the beatings and torture. It was my fault for not being more perfect. I willed myself to try harder.

Eventually, Dad returned to the breezeway. The sticks weren't big enough. They wouldn't hurt enough. (I can't fathom what it takes for a parent to think: *This stick won't hurt my small child enough—I need something more painful.*)

Clearly, the goal was to inflict real pain. I still think about that now.

So, he put the sticks aside and picked up a rubber garden hose instead—sturdy enough, rubber so it would sting nicely, unbreakable.

Then, like a monster, he transformed into an enraged Hulk and beat us. Over and over and over again.

Welts didn't matter.
Tears didn't matter.
Pleading didn't matter.

It was over when he was done. When his rage was spent.

He beat both my sister and me, one at a time. We screamed and cried, begging for mercy. There was never any mercy.

And then, as if nothing had happened, he put down the hose, told us to pull ourselves together and quit crying. He straightened his tie, brushed the dust from his clothes, and went back to the bookstore—to sell more Bibles and give his testimony.

I have no idea what my sister and I did for the rest of that day.

The beatings continued. We tried to find ways to dull the pain. My older sister experimented with putting paperback books down her shirt and pants or wearing multiple layers of clothes for protection. I was too scared. Too obedient. I was afraid of getting caught and making it worse.

I was sure I deserved it.
I was convinced I was bad.
I thought if I could just be perfect, maybe he wouldn't hurt me anymore.

Even now, at 64, I am tormented by the same question: *Why?*
Why did they torture me like that?
I can't remember doing anything wrong.
I want it to make sense.
If I could just remember my sins, maybe then I could connect cause to effect.

But in my strongest moments, I know I didn't deserve those beatings. I know my parents were monsters.

Perhaps the worst beating of all was when my father told me I had been *especially* bad.

So bad, in fact, that he must be an incredibly bad parent.
So bad that *he* deserved to be punished for producing such a sinful daughter.
He needed to be punished—not me.

And then, he told me to beat him.

I was horrified.

Can you imagine?

We went into my bedroom. He handed me his belt, knelt on the floor, leaned over my small bed, pulled down his pants, and screamed at me to beat him.

I can't describe the confusion in my mind.
I couldn't process it.
I idolized him.
How could I do this?

I begged him not to make me. I promised I'd be good. I swore I'd never be bad again.

But he was in a rage.

"Harder," he ordered. "Make it hurt."

There are no words. There weren't then, and there aren't now.

Somehow, we survived. Time went on. I grew older.

At nine, it was time for me to go to boarding school. My older sister had already been there for two years. Now, it was my turn. I didn't understand why all the BIC missionary kids were sent away from home.

Again, it was clear we were in the way of things that really mattered. So off I went to Zimbabwe with the rest of the BIC missionary children.

That first night at Boarding School, I lay in my little bed, crying, terrified. Nobody asked if I was okay. Nobody thought a nine-year-old girl might need kindness or comfort. I learned to suck it up and rely only on myself.

And that was my first glimpse of what boarding school would be like. It provided food and a warm bed, but there was no kindness. No emotional safety. No care for our broken hearts.

At least there were no beatings.
For me, anyway.

Returning to the United States

At thirteen, we moved back to the States. I sobbed, not wanting to leave my whole world; everything and everyone I had ever known. I didn't understand. No one comforted me. No one talked to me about what was happening. It was simply time to do "the next thing for God."

There was no warning about the culture shock I was about to experience. No explanation of whether we'd ever go back. I was just dumped into the next phase of life.

My siblings and I started school in the States—fresh off the mission field. There was no transition, no friends, no comfort from our immediate family, and no connection to extended family. We barely knew them. We had been in Zambia too long.

My father took a job as the administrator of the old Messiah Home in Harrisburg. He and his team envisioned building a larger, modern BIC retirement community—what is now known as Messiah Village (or Messiah Lifeways).

My mother sold Avon and studied to become a BIC church counselor. We attended the Carlisle Brethren in Christ Church. Walter Winger was the pastor, later replaced by Ken Hoke.

My parents were everywhere.
They led the youth group.
My mother played piano and organ.
They sang in the choir.
Sometimes my father preached.

(Only recently have I realized that, until I went to boarding school, my parents were my sole source of information about myself, religion, God—*everything* in my world.
They were my parents, my Sunday school teachers, my preacher.
My mother homeschooled me.
They led the youth group.
They attended every church outing.

And of course, the abuse we had known in Zambia continued in the States.

If anything, it got worse.
More severe.

Because we were growing up.
Because we had our own thoughts.
Because we dared to ask questions.

Perhaps that was our greatest sin. Asking questions. Why?

I've focused on our beatings from my father. And as brutal as my father's beatings were, my mother's torture was almost worse.

Her constant lies.
Her relentless gaslighting.
Her manipulations and tricks.

She made me doubt every single thought I had.

If I thought something was green, she'd say, "You *know* it's not green—it's brown." And I believed her. She was my mom.

This was my life for seventeen years while I lived with them.

Over time I was losing touch with reality.
I had to work hard to separate fact from the fiction she pumped into my head.
My sanity was hanging by a thread.

I was in real danger of not knowing what was real.

College Crisis

Around this time, I realized that college was my only escape from their mind control and beatings. I knew I had to leave—nothing would stop me. If I wanted to survive, I had to go.

I was accepted to Messiah College, and I couldn't wait. For the first time, I felt truly happy and focused. I could see the light at the end of the tunnel.

Then, with horror, I realized my little brother and sister would be left alone at home when I left for college. I had always seen myself as their protector, and the thought of abandoning them to endure years more of the abuse I had suffered was unbearable. How was it fair that I could escape, but they couldn't.

Yet, I had to go—soon—before I lost my grip on reality. Just as importantly, I had to find a way to protect my brother and sister.

I was 17 years old, had been in the States for only four years, and was still experiencing culture shock. My parents had sheltered me from the outside world, leaving me with no adults to confide in or seek guidance from. Sitting alone in my bedroom, I could think of only one thing that might help. I had to try.

Seeking Help From My BIC Pastor, Ken Hoke

I mustered up all my courage and decided to tell my pastor, Ken Hoke, at the Carlisle Brethren in Christ Church, what was happening to us. Before speaking to Ken, I had never breathed a word of our abuse to anyone. This was a massive step for me.

Given the background of abuse we endured, I hope it's clear how desperate I was and how crucial my plea was for the safety of my siblings and me. It was indeed a life and death cry for help.

I tried to prepare as best as any 17-year-old could. I thought about ways my siblings could be protected while I was gone. Could they be placed in a foster home? I had no idea what that entailed or how the process worked. I only knew we needed to be free from the pain and torture we were enduring.

The church felt like family—at least, a kind one, unlike what I experienced at home. I had always been a very good kid. People at church, at school, everywhere knew I wasn't a troublemaker. Ken knew that too. Because of this, I felt credible. I was sure I would be listened to.

Even now, when I blame myself for what happened with my siblings, I wonder if I did the right thing by confiding in Ken and asking for help.

Reading Ken's own words on the BIC website, helps me know I did the right thing:

From Ken: "Many people don't expect to find honest, true community in the Church, but it is what we as a Brethren in Christ family can give to each other and to those around us."

Back then, at 17, 13, and 9 years old, that was exactly what three desperate kids needed—honest, true community. I needed trustworthy adult wisdom. I needed help finding safety for my siblings and me. I didn't expect the BIC Church to solve all our problems, but I was sure Ken could provide resources or guidance.

As an adult now, I understand that if a child asks to be taken away from their parents, something extreme is happening. It's not a casual request.

So, I spoke to Pastor Ken Hoke and told him we were being horribly abused. It was excruciating. I had never told anyone. He asked me what I wanted to happen. I didn't know—I just wanted the pain to stop. I was 17, seeking wisdom from a trusted adult and pastor, hoping he could show me some resources to help lead my siblings and me to safety. Just point me in the right direction.

The only solution I had thought of was foster care. I asked Ken if that was possible. He said he would ask around.

Several days later, he told me he had spoken to a friend at Children and Youth Services. They said the state preferred to keep families together if possible.

And that—was the end of any discussion about keeping the Kibler children safe from torture.

That. Was. It.

I didn't know what else to do. I had nobody else to talk to. My little sister and brother were doomed.

What Ken Hoke DIDN'T Do. A Closer Look

It has been 47 years since I found the courage to reveal what was happening at home and ask my BIC pastor, Ken, for guidance and help.

I had no one else to ask. I was just 17. My siblings were 13 and 9.

As a state-mandated reporter, Ken did **not** report the abuse. Not reporting this abuse is illegal in the State of Pennsylvania. He never followed up to ask how we were doing. He never checked if we made it out alive. He never asked my brother and sister if they were okay after I left for college. He never once pulled me aside at Messiah College, where I saw him dozens of times, to see if I was okay or if the church could help. He never followed up. He never checked in. Not once in 47 years.

In my mind, I was neglected and abandoned once again. Unworthy. Cast aside. Not believed. My siblings and I didn't matter. Ken Hoke, my representative of the BIC Church and of God, betrayed the Kibler children profoundly.

What Ken DID Do

Ken did talk to a small group at Carlisle BIC Church about my claims. This led to a small team visiting my house to confront my parents. Predictably, my parents denied everything. I got into huge trouble for exposing our family's secrets, even though they were true.

One positive outcome was that a BIC Church team member, Stan Beachy, offered *me* a place to live, which I accepted for a few months before leaving for college. Stan helped me escape. But my little brother and sister were left to be tortured.

My siblings had no choice but to stay. The abuse continued.

In recent conversations with members of that small BIC group that Ken pulled together, I learned that Lane Hostetter, one of the team members, said, *"I have a rebellious daughter too. You can take what Greta's saying with a grain of salt."*

Lane didn't know me. Yet, he dismissed me. He chose not to believe me. He worked with my father at Messiah Village. We children never stood a chance.

None of the BIC group who Ken told about our abuse reported it. None of them helped us find resources to protect my little brother and sister. In my mind, Ken Hoke and that small team were complicit in allowing the abuse to continue.

While Ken's Career Flourished, the Kibler Children Struggled

Ken Hoke went on to have a storied career with the BIC Church, serving for nearly 50 years. The BIC website describes him as: "A leader who cares for the denomination with a pastor's heart." He was a Bishop of the Susquehanna Conference and pastored for 27 years.

His legacy within the BIC denomination is described as follows: "Ken has anchored the BIC denomination in Christ during both smooth and turbulent times—toward healing, growth, and reconciliation with each other, in our congregations, regional conferences, and across the denominational body."

I wonder if Ken ever considered healing or reconciling with the horribly abused Kibler children he abandoned all those years ago while he built his career and worked to heal others within the denomination.

My Parents–Known Child Abusers–Promoted by the BIC Church

My parents continued to be celebrated and upheld by the Brethren in Christ Church. They were sent to Zambia again as missionaries. My abusive father pastored two more churches. My abusive mother was hired as a Christian counselor at Cedar Grove.

Eventually, they moved into Messiah Village, where a bridge connecting several buildings was named "Kibler Bridge" in honor of my abusive father. It's still there—a bridge named after a Child Abuser.

And Ken knows this.

I often wonder if Ken thinks about this when he passes Kibler Bridge on his way to meetings at Messiah Village.

I have spent many painful years confronting my father about the abuse and neglect we endured at his hands. At first, he flatly denied it. Over time, he admitted to some of it—the rest, he claims he can't remember. He insists I forgive him so we can maintain a relationship. Forgiveness requires accountability. I don't forgive him.

I'm done seeking accountability from my father. It will never come. He and my mother remain lauded child abusers within the Brethren in Christ Church.

The Difficult Journey of the Kibler Children

My little sister, [redacted], is dead. She died in 2011 at just 47 years old of acute alcohol poisoning.

[redacted] struggled for years with addiction to alcohol and drugs. She spent time homeless. She died on a mattress under some bushes on Manchester Avenue in Anaheim, just 34 miles from Rancho Cucamonga.

No one knew she was dead until the stench of her decomposing body became overwhelming and neighbors called the police. They identified her by what remained of her fingerprints. We don't even know which day in May she died.

She was my little sister, and I miss her terribly. I tried to protect her, but I couldn't. Ken and the BIC Church let me down. I can't live with myself for that.

Yes, [redacted] made her own choices, but how much harder was her path because of the years of neglect and abuse she and we endured? How much of her suffering could have been prevented if someone had intervened? If a caring adult—Ken Hoke—had stepped in when he was notified of the abuse?

Ken Hoke has blood on his hands for my sister's death.

I wonder if my sister would still be alive today if Ken or any other adult had taken action. I wasn't asking Ken to adopt us. I just wanted to be pointed toward resources.

And What About Me

I escaped my parents' physical abuse when I went to college and graduate school. It has taken hundreds of hours of therapy, millions of tears, and decades of torment before I finally cut off my parents entirely. I had to sever ties with my older sister and little brother due to the continued toxicity that runs rampant in my family.

Now, at 64 years old, I have zero immediate family left. The toxicity of my upbringing cost me my family relationships. The years spent in Africa meant I never got the chance to know my extended family. So I have zero family members at all.

But, I am at peace. I am safe. I have my beloved husband, and I am no longer being abused.

Finally.

It took me 64 years.

My Heartfelt Apology, Amends, and Responsibility is Overdue

I was able to retire early, which has given me the time to process my past. I am now seeking justice for the betrayal I suffered at the hands of my pastor, Ken Hoke, and the BIC Church. Their abandonment of me and my siblings has tormented me for 47 years.

I wasn't able to save my little brother and sister. I went to my Church family for help. I did everything I knew how to do as a 17-year-old, but it wasn't enough.

Without a doubt, the inaction of Ken Hoke and the BIC Church set off a chain reaction of suffering that contributed to my sister's death.

What Will Set this Right

The final piece for me is understanding how my most trusted pastor, Ken Hoke, justified doing nothing.

I don't understand how it was acceptable for him to see my little brother and sister every Sunday–for years– knowing they were being tortured at home, and remain silent?

How was it okay for him to serve on committees with my abusive parents for 47 years without letting the Church know they were severe child abusers? He allowed known, severe child abusers to continue actively serving the church in various and increasing capacities.

Two and a half years ago, I reached out to Ken Hoke via email. I wanted to understand if he felt any responsibility for what happened. I updated him on what happened to my siblings and me—something he had never once asked about.

His response? Empty words. Emails filled with bureaucratic language. No humanity. No kindness. No accountability.

Ken wrote, in part:

> "I was part of something that added to the pain and rejection you felt. I accept that and receive your anger related to it. You may let it go and not carry it any further."
>
> "I do except (sic) that what I was able to do or not do was a failure from what you had asked me to do. I also realize that a large part of the failure was not doing something that protected [redacted] and [redacted]"
>
> "Blessings"

I'm not sure how he thought this would be healing for me or begin a path to reconciliation. I certainly didn't feel a warm fuzzy after reading this. It's hollow. Empty words. Zero accountability.

I need responsibility and accountability from Ken Hoke and the BIC Church for the damage they allowed to happen.

Concerns about Systemic at the Brethren in Christ Church

As I have begun researching abuse within the BIC Church, I am appalled by what I've found. I have connected with people who are finally finding the courage to speak out about their own experiences. The more I dig, the more I uncover. I'm concerned what I'm seeing is a pattern of abuse that gets covered up.

Ken volunteered to me, "One of my pastoral friends had his son commit suicide because of our failures." I've learned many details of this horrific situation since then.

Again, Ken volunteered that "Warren Hoffman, the Moderator, and I wrote a prayer of confession that we read as part of a General Conference gathering in which we confessed our collective failure to people who were abused in the ministries of the church."

I hope you understand why this prayer of confession does not address what happened to me and my siblings. I never knew about this prayer of confession till recently.

After that public acknowledgment, it would have meant so much to receive a personal letter from Ken—one that recognized the failures of the past, expressed that he had been thinking about our family, acknowledged that he could have done better, and conveyed his profound sorrow.

What a gift that would have been. But it never came. We deserve that.

Other horrifying stories include:

- [redacted] was molested by older boys at Youngways, the BIC boarding school in Zimbabwe."
- "Our year at the BIC Boarding School was capped off by being shelled by Iraqi guerrillas. One of our group was killed."

- 38 sexual assault charges filed against a BIC pastor at Ontario BIC Mega Church (The Meeting House - Upper Oaks Community Church).
- "My BIC parents left my brother in the U.S. for six years while they went to the mission field."
- "Something happened to me at the BIC Boarding School that profoundly altered my life."

Yes, You Can Help Me–Realistically and Easily

As I prepared for this conversation, I reflected on who I'm speaking to—Tom Law, the Chairman of BIC Churches US. I want to be realistic about what you can and cannot.

I have one more step that would be easy for you: reach out and have a conversation with Ken.

Have a heartfelt, honest discussion with him about the situation with my siblings and me. Let him know I am seeking responsibility for this devastating lapse of judgement. Another prayer of confession will not bring healing to me. It won't bring my sister back. It won't heal his 47 years of silence.

I am encouraged by the Ken's and the Church's stated commitment towards healing and reconciliation. I am so hopeful my one small request can be fulfilled.

So, I ask—can you take this step? Can you have this conversation with Ken on behalf of me and my siblings and deliver some kind of responsibility taken, apology, amends?

This is what will—finally—bring me peace.

Thank you, Tom, for reading this letter and for listening to my story. I hope that when we speak on February 14th, you will have some thoughts on how the BIC Church can provide the justice I seek.

With regards,

Greta

From: **Thomas Law** [redacted]
Date: Sun, Feb 16, 2025 at 8:34 AM
Subject: Fw: Our Meeting
To: Greta Roberts [redacted]

Good morning again, Greta.

I see on the news that the predicted snowy weather is plummeting your area, so I hope that you and your husband are safely and warmly sequestered in your home.

As an FYI I just wanted to add this response to the email I already sent you after our conversation on Friday. Our National Director, Alan Robinson, has graciously responded to my request for a speedy meeting and we now plan to talk at 7:00 AM PST on a day later this week so that I can share with him more details of your letter to me and our Zoom conversation together. I have not yet sent Alan an actual copy of your letter, but I have shared the contents with him. As per your previous written requests for privacy and confidentiality, and per our agreement during our Zoom conversation, I have shared, and will only share, the contents of your letter outlining your memories, perceptions and allegations with Alan, and eventually, Peter Guinther, the BIC Human Resources Administrator. I will not share the contents of your letter or the details of our conversation with any individual members of the General Conference Board or the Leadership Council at this time.

I'm going to do this for a number of reasons. First, in order to expedite your request for a prompt and proper response to your letter, it would be best to limit our conversation, at least in the early stages, to a smaller. but very important group of people, who can address the contents of your correspondence and the process that needs to be taken in order to address your two requests. If too many voices are involved right from the start, this will initiate the need for involvement of both many more people and much more discussion immediately, delaying the BIC response and ability to respond quickly to your letter. Each of those men and women on LC & GCB would probably have more questions about the perceptions and memories you shared in your letter and a much larger conversation, initially, will delay your hopes for a very timely response and/or action concerning what you have shared. There will always be time to bring others into the conversation later in the process, as necessary, so I believe we should share with, and concentrate on, the smaller group of people at the start of this process - you, your husband, myself, Alan & Peter and then expand the conversation, as needed, so that we can hopefully expedite the process more quickly and give you the peace you are seeking after these many years.

Secondly, in your letter you share a number of allegations regarding both of your parents as well as members who have served in the BIC over the years. Since **these are serious allegations against both your personal family members, as well as other public figures in the BIC, I believe it would be best to protect your identity and your privacy in the initial evaluation and investigation. Obviously, there will come a time when more needs to be shared publicly, but I believe you should be protected initially since this is a very serious issue and these are very serious allegations with many ramifications.**

Finally, and somewhat related to what I have written in my first reason above, I do not want to send out anything that you have disclosed to me in your letter or in our direct conversation on Zoom, to anyone without first receiving your specific expressed permission to share your precise words or understandings regarding any part of our written and/or verbal conversation. When you do have the chance to speak directly with others, I want to make certain that you can share your testimony both in exactly the way you wish, and with your exact words, so that it is not affected or altered in any way by what I may just think I am hearing from you. Just as I will honor the authenticity and confidentiality of what you wish to share publicly or privately, I am sure you will do the same for me by not sending out any part of the conversation I have shared with you on Zoom or in writing without my express permission. This is a very important and very sensitive story you have shared with me, and I want to make sure, to the extent I can, that you are heard and that there are no misunderstandings that emanate from any of the conversation we have. Your privacy and exact words are very important to me, and I want to honor that as we go forward together.

With Warm Regards again,

Tom

---------- Forwarded message ---------
From: **Guinther, Peter** [redacted]
Date: Mon, Dec 15, 2025 at 3:38 PM
Subject: RE: Request to Continue Our Investigation / Establish a Way Forward
To: [redacted]
Cc: Beaty, Heather [redacted]

Dear Greta,

Thank you for your email. On behalf of BIC U.S., I can say we are glad to read that the steps taken in inviting GRACE to investigate your concerns were appreciated as steps toward seeking truth and justice. BIC U.S. does have a Ministerial Misconduct Policy and Procedure in place for following up on all such reported concerns, and we attempted to follow this policy and procedure as best we could when you reported your concerns to us. All reported concerns of Ministerial Misconduct are taken seriously.

We are disappointed to read that you found out about GRACE discontinuing the investigation through a third party, not directly from GRACE itself. GRACE communicated with BIC U.S. that within 48 hours of notifying us that the investigation was being terminated, they would also notify you. Until receiving your email on Friday, BIC U.S. understood GRACE to have done so. We do not know if GRACE communicated to you the reason for discontinuing their investigation. What they communicated to us was,

> "The decision to terminate the investigation was made in consideration of the actions of individuals that attempted to speak on the behalf of the reporting victim and continuous rejection of the boundaries of communication and interaction put into place by the institutional response team. This resulted in the inability of the investigative team to directly, appropriately, and independently verify and corroborate the reporting victim's account. Through no fault of the reporting victim or BICUS, communication and completion of an independent and objective investigation became untenable."

We can understand your sentiments, "When this process stopped abruptly and communication broke down, it mirrored earlier experiences of being dismissed and unheard. Maintaining momentum and follow-through will help prevent further re-traumatization and supports the possibility of closure, accountability, and restoration." BIC U.S. would like to move in the same direction of closure, accountability, and restoration. In pursuit of this, BIC U.S. will continue to follow our Ministerial Misconduct Policy.

Our next step will be to address with George and Ken the specific concerns you raised in your paper, "Justice for Greta." These concerns were never shared with them by BIC U.S., believing it might interfere with the investigative work GRACE was conducting. We relied on GRACE to interview these men and share the specific concerns. It appears that this was never done. Therefore, we would like your permission to share your paper with them. Following our conversations with George and Ken, decisions can then be made on appropriate next steps.

Sincerely,

Peter Guinther

Human Resources Administrator

Brethren in Christ U.S.

431 Grantham Road

Mechanicsburg, PA 17055

RE: Carlisle Brethren in Christ Church Investigation

RA Robinson, Alan [redacted]
To Jim Holler

Reply | Reply All | Forward | ...
Thu 5/21/2026 8:57 AM

Good morning, Jim,

Based on your reference to the GRACE investigation, it does seem that we are both talking about the same situation. I can confirm that we contracted with GRACE (who, among others, assisted in the writing of our policies) and that they had to terminate the investigation. It is my understanding that this decision, which we had no part in, was made due to the inability to conduct an independent and thorough investigation because of interference from persons claiming to represent the complainant. I can assure you that BIC U.S. acted in complete good faith and full compliance with the investigation, and were not held in any way responsible for the termination, and this was stated by GRACE in their communication about the decision to terminate. I can also confirm that GRACE confirmed to us that they had communicated to the complainant that they were terminating the investigation.

The termination was a disappointment to us for several reasons. Like you, we desire truth, safety, and integrity. We take all allegations seriously and seek to follow our policies. Second, we had complied with every aspect of the investigation. This included multiple persons (including myself) being interviewed by the GRACE investigators. A great amount of human and financial resources has been expended on the investigation and in our desire for truth. It was disappointing to discover that GRACE could not complete their work.

We then contracted with another independent company to investigate. This company, like GRACE has a national reputation. We are currently in a process of receiving and reviewing the results of their investigation. I do not feel that it is appropriate to disclose the name of the organization until our review of findings is complete and we are ready to communicate them.

Given all of the above, I think you can understand our surprise when you then contacted us and informed us that you had been contracted to do the same work. I understand that you may not have had all of the above details when you agreed to take on this investigation. However, given everything that I have stated, I hope that you will understand our reasons for asking who you are doing this work for. Also, given that two external investigations have completed their interviews with everyone in or connected to the Church, it does not seem appropriate to begin all over again with a third company.

I understand that we cannot and should not ask you to not proceed. However, I would ask you to consider pausing until the findings from the most recent investigation are received, evaluated, and communicated. I do also wonder about apparent conflict of interest if you have been contracted by one of the parties in the situation. If you choose to not do this, I think it is very important that you clearly communicate to anyone that you may contact that you have not been hired by and you are not working on behalf of BIC U.S. (the Church) and that you are not a part of the investigations that have already taken place. I think this full and complete disclosure is appropriate to avoid any confusion.

I remain happy to talk with you if that will be helpful. As noted previously, I will be on leave from tomorrow (today is my last day in the office). I can be available today for a phone or Zoom conversation if that is helpful.

Sincerely,

Alan

Alan Robinson
National Director

Brethren in Christ U.S.
431 Grantham Rd.
Mechanicsburg, PA 17055

[redacted]
www.bicus.org

Carlisle Brethren in Christ Church Investigation

HT Jim Holler [redacted]
To [redacted]

Reply | Reply All | Forward | ...
Wed 5/13/2026 2:32 PM

Mr. Law,

My name is Jim Holler, and I am the lead investigator with FireflyISAI, headquartered in Fairfield, PA. We focus on providing thorough, independent third-party investigations.

FireflyISAI has been contracted to conduct an independent third-party investigation into an allegation of abuse that occurred in the mid-1970s at the Carlisle Brethren in Christ Church (now known as The Meeting House Carlisle). This investigation is primarily focused on the Carlisle Brethren in Christ Church, while also seeking information about related experiences or patterns, past or present, within other Brethren in Christ Church settings that may help inform this assessment.

Firefly will investigate whether clergy members, staff, or volunteers of the Carlisle Brethren in Christ Church failed to protect children by committing or overlooking abuse, and whether individuals in positions of authority responded in ways that silenced survivors, concealed reports, or allowed harm to continue. We will also examine whether the church took appropriate steps to safeguard children and whether any failures to report abuse contributed to further harm.

I am aware that the church has taken meaningful steps over the years to strengthen its policies and procedures for responding to ministerial misconduct, and I appreciate the commitment reflected in those efforts. With that in mind, would the church be willing to share the online survey with its members to support a thorough and transparent review? The confidential online questionnaire can be located at www.fireflyisai.com/brethren-in-christ-investigation

Please feel free to contact me if you have any questions.

Sincerely,
Jim Holler

Jim Holler – *Chief of Police (Retired), Lead Investigator*
[redacted]

FireFly – *Independent Sexual Abuse Investigations* – Founder/CEO - www.FireflyISAI.com [redacted]
Holler Training –Founder/CEO - www.hollertraining.com [redacted]

Re: Firefly Carlisle Brethren in Christ Investigation

RA

Robinson, Alan [redacted]
To Jim Holler
Cc Thomas Law; Guinther, Peter

Reply | Reply All | Forward | ...

Thu 5/28/2026 10:26 AM

You replied to this message on 5/29/2026 8:21 AM.

Good morning, Jim,

I am sending this email from my phone as I do not have my laptop with me. Therefore, please excuse any typos.

I have copied Tom Law and Peter Guinther on this email. Peter is our human resource administrator and he has been handling communications regarding our investigations. As you are aware, I will be out of the office for a few weeks and so it is important that Peter is included on this email as he will be handling communications for the coming weeks.

BIC US has now received the report and statements of findings from Telios Law. BIC US will process the information that we have received and will also provide information to the involved parties in the near future.

As you will see at some point, when you receive information from the person who has contracted with you, the findings of the report include the fact that the response of Ken Hoke and the Carlisle Brethren in Christ Church to the allegations that were made in the 1970s were appropriate and robust.

Sincerely,

Alan
Sent from my iPhone

From: Jim Holler [redacted]
Sent: Friday, June 12, 2026 8:19 AM
To: Robinson, Alan [redacted]
Cc: 'Thomas Law' [redacted] Guinther, Peter [redacted]
Subject: Follow-Up Questions Regarding the Investigative Process

Alan,

I want to thank you again for the openness and care you have shown in your communication with me over the past two weeks, especially while you have been on sabbatical. I also want to express my appreciation to both Tom and Peter for their steady communication and support during this time. I recognize that these conversations require emotional energy and thoughtful attention, and I am genuinely grateful for the willingness each of you has shown to engage with this process.

As we await the final report from the second investigation, I have a few questions I hope you can help clarify. I want to share these questions in a spirit of understanding, transparency, and healing. My intention is not to assign blame, but to better understand the decisions that were made and how they affected those involved — especially Greta Roberts, who carried this experience for so many years.

1. When Greta came forward in 2025 to share her concerns about how her situation was handled in the late 1970s, what guided the decision to begin an investigation with GRACE? I want to acknowledge that choosing to revisit a decades-old experience was a courageous and compassionate step. It signaled a willingness to listen deeply and to honor the harm she had carried for so long.

2. When GRACE withdrew from the investigation, was Greta informed of that change? If she were, would you be able to share any record of that communication? If she was not informed, I would appreciate understanding the reasoning behind that decision. For survivors, consistent and transparent communication can be an important part of feeling safe, respected, and included in the process.

3. When the church contracted with Telios Law to continue the investigation, why was Greta not notified of that transition? And if you are able to speak to this, could you help me understand why she was never interviewed by Telios Law? Being informed and included — or at least having clarity about the process — is an essential part of trauma-informed practice, and I'm hoping to understand how these decisions were approached.

Thank you again for taking the time to consider these questions. I ask them with respect and with a desire to understand the full picture so that clarity, healing, and accountability can continue moving forward.

Thank You

Jim

Jim Holler – *Chief of Police (Retired), Consultant*
[redacted]

FireFly – *Independent Sexual Abuse Investigations* – Founder/CEO - www.FireflyISAI.com [redacted]
Holler Training –Founder/CEO - www.hollertraining.com [redacted]

RE: Follow-Up Questions Regarding the Investigative Process

GP

Guinther, Peter [redacted]
To Jim Holler; Robinson, Alan
Cc 'Thomas Law'

Reply | Reply All | Forward | ...

Fri 6/12/2026 4:33 PM

Good afternoon, Jim,

Thank you for your email with the questions for clarification on the process BIC U.S. has been following. I am not sure when Alan might see your email, being on Sabbatical still, but I will answer your questions from the limited knowledge I have of this situation. I trust that Alan may be able to add or clarify my responses when he has a chance to respond.

1. When Greta came forward in 2025 to share her concerns about how her situation was handled in the late 1970s, what guided the decision to begin an investigation with GRACE? I want to acknowledge that choosing to revisit a decades-old experience was a courageous and compassionate step. It signaled a willingness to listen deeply and to honor the harm she had carried for so long.

   I believe there were two primary reasons why BIC U.S. chose to begin an investigation with GRACE. The two ministers mentioned in Greta's concerns were too well known within the BIC denomination that conducting an unbiased internal investigation, or even an internal investigation that seemed unbiased, would be difficult. So, we consulted with GRACE, with whom we already had a working relationship from writing our Ministerial Misconduct policy, and they agreed that an external investigator would be appropriate.

2. When GRACE withdrew from the investigation, was Greta informed of that change? If she were, would you be able to share any record of that communication? If she was not informed, I would appreciate understanding the reasoning behind that decision. For survivors, consistent and transparent communication can be an important part of feeling safe, respected, and included in the process.

   Greta was informed by GRACE. The email from GRACE indicating that this was done is available. Greta claimed in her email that she never received such an email, but GRACE has it documented that it was sent to her. GRACE asked us to refrain from contacting Greta until she received their email. We did so and expected to hear from either GRACE or Greta that she had received the email. We did not hear from Greta until we received her email titled, ""A Survivor Breaks her Silence at the BIC Church." Then we continued correspondence with Greta.

3. When the church contracted with Telios Law to continue the investigation, why was Greta not notified of that transition? And if you are able to speak to this, could you help me understand why she was never interviewed by Telios Law? Being informed and included — or at least having clarity about the process — is an essential part of trauma-informed practice, and I'm hoping to understand how these decisions were approached.

   I believe there were two primary reasons: BIC U.S. did not ask Telios Law to continue a full-blown investigation but just conduct some interviews. The information Greta has already submitted through her correspondences was sufficient for Telios Law to develop those interviews. Greta had expressed in her emails that the interview with GRACE and the other events of the past year have been retraumatizing and we did not want to continue that in her life. Secondly, we had consulted with Telios Law about communicating these new developments with Greta, realizing that transparency is important in trauma-informed care, but Telios Law advised against this as the actions of Greta and her advocates already caused the previous work of GRACE to be terminated.

From my limited understanding, these are the answers I am able to provide.

Peter Guinther
Human Resources Administrator

Brethren in Christ U.S.
431 Grantham Road
Mechanicsburg, PA 17055

[redacted]
www.bicus.org

From: **Guinther, Peter** <[redacted]
Date: Thu, Jun 18, 2026 at 9:29 AM
Subject: Sharing Statement of Findings
To: Greta Roberts <[redacted]>
CC: Beaty, Heather <[redacted]>

Hello Greta,

Bishop Beaty and I are writing to inform you of actions taken by BIC U.S. in relation to the concerns you submitted for review. In recent months, BIC U.S. continued to review the concerns outlined in your letter, "Justice for Greta," following the termination of the investigation by GRACE (Godly Response to Abuse in Christian Environments). We realized that though the investigation could not be continued in accordance with GRACE's standards, the concerns still remained and needed to be further addressed, particularly with respect to the actions of BIC church leaders at the time. BIC U.S. has been working with attorney, Theresa Sidebotham, of Telios Law to conduct further interviews and an assessment based on the concerns you stated in your letter, as well as in the email, "A Survivor Breaks her Silence at the BIC Church."

While this was not a full third-party investigation, but an assessment focused primarily on church response, Telios Law affirmed in its findings that some level of neglect, physical abuse, and emotional abuse took place (Please note that this was based on evidence that affirmatively came up, not a finding that what you alleged did not take place). For this, and for the impact of these painful occurrences which has endured throughout your lifetime, we are deeply grieved. As outlined in our policy, the findings are being reviewed by Leadership Council members and will be addressed with George Kibler.

The findings from Telios Law also indicate that, although Ken Hoke was not legally a mandatory reporter at the time you shared your concerns in the late 1970's, he did take appropriate steps to address the concerns, given the standards of the day. Pastor Ken consulted with Child and Youth Services leadership, and church leaders also took up the responsibility for follow-up on your concerns. This included arranging a place for you to live. While expectations and procedures have changed since then, this would have been considered appropriate action for the church at that time. We are grieved that neither secular law nor actions of the church were fully adequate to resolve your family situation at that time.

Since then, just as laws have been altered in order to better protect children, we too have been working to improve in this area. BIC U.S. has taken several steps to better prevent and respond to such situations.

1. BIC U.S. revised language in the Congregational Governance section of the Manual of Doctrine and Government to include provisions for handling allegations against pastoral staff of misconduct including prompt notification of the Bishop, and the requirement to report alleged misconduct to applicable governmental agencies as required by law.
2. Candidates for first-time credentialing and renewal of credentials with BIC U.S. go through a pastoral screening process, including background checks.
3. BIC U.S. World Missions has put in place a separate Child Safety and Protection Policy, developed under the guidance of the Child Safety Protection Network (CSPN), especially focused on caring for children in overseas BIC U.S. contexts. Every missionary goes through child safety and reporting training before deployment and follow-up training while in service. A Child Safety Officer and team have been appointed for addressing any reported concerns.
4. Since 2013, BIC U.S. World Missions has had a Member Care Administrator for its missionaries and recently hired a new Member Care Administrator who specializes in Third-Culture Kids' (TCKs) issues. This role includes debriefs with missionary children while on the field and during home ministry. We also routinely send missionary families to third party organizations for formal debriefs for both the adult missionaries and any children of the adult missionaries.
5. BIC U.S. developed a new Ministerial Misconduct Policy and Procedures under the guidance of Godly Response to Abuse in Christian Environments (GRACE), and we have trained Response Team members to address local congregational situations not requiring external investigative organizations. Both GRACE and Telios Law curriculum are incorporated into this trauma-informed training.
6. BIC U.S. leadership has received training on recognizing and responding to abuse in the Church context.
7. BIC U.S. continues to develop and implement new educational programs and training for pastors in the areas of abuse and trauma-informed care.

While the steps that we have taken in recent years do not change what you have experienced in the past, we know that part of your concern is for other children and do hope that it shows that we are trying to improve as a community in this area. We will continue to try to improve and keep current with best practices. Please find attached the statement of findings from Telios Law.

Peter Guinther
Human Resources Administrator

Heather Beaty
Susquehanna Conference Bishop

Brethren in Christ U.S.
431 Grantham Road
Mechanicsburg, PA 17055
[redacted]
www.bicus.org

BIC U.S. Policy and Procedures in Responding to Ministerial Misconduct

I. Foundational Concerns

The *Brethren in Christ U.S. Manual of Doctrine and Government* (Article 1.1) defines the Scriptural qualifications of ministers as those given in 1 Timothy 3:1–7 and Titus 1:7–9. These verses speak to the importance of a minister's qualifications including a personal experience of God's saving grace and power evidenced in regeneration, transformation, and exemplary godly living; a sense of calling to Christian ministry accompanied by the affirmation of the church; demonstrated graces and gifts to serve as a minister of the gospel; and a commitment to be a lifelong disciple of Jesus.

Drawing upon these biblical qualifications for those who serve as ministers, BIC U.S. specifically requires ministers to: exemplify godly living; be passionate lifelong followers of Jesus and representatives of God's kingdom; affirm a personal belief in the *BIC U.S. Articles of Faith and Doctrine*, the *BIC U.S. Core Values,* and a willingness to abide by the *Manual of Doctrine and Government*; be willing to be directed by the decisions of General Assembly; engage in lifelong learning as a minister of the gospel; be assigned to and continue to serve in a ministry role approved for BIC U.S. ministerial credentialing as listed in Article 1.2.

II. Purpose of the Ministerial Misconduct Policy

In situations where credentialed ministers and lead pastors within the BIC U.S. cease to meet the given qualifications above, the collaborative and progressive response outlined in this policy will be enacted as a means of grace intended to promote spirituality, unity, and cooperation in our quest for piety and obedience.

As a community, BIC U.S. is committed to protecting the vulnerable, caring for survivors, and holding those involved in ministerial misconduct or abuse accountable. Our commitments come from God, who is a refuge for the abused and never ignores their cry (Psalm 9:9,12). Our community seeks to embody God's priority of justice for the vulnerable that comes with his Kingdom (Ezekiel 34; Jeremiah 23). We cannot face misconduct or abuse if we are in denial regarding its reality. Instead, Jesus calls us to be "wise as serpents." (Matthew 10:16).

Our goal is to prevent and respond appropriately to ministerial misconduct and abuse by becoming a community that is educated on various forms of abuse and common dynamics, clarifying appropriate boundaries, and doing the hard work of holding each other accountable. All persons should experience an environment of safety and justice and one that is free from any form of abuse.

This policy is not intended as an outline of legal procedures but is driven by a motive for justice-making in which the BIC U.S. seeks to keep faith with its members, respond quickly and appropriately to concerns of ministerial misconduct, take action to appropriately protect and respect all persons involved, maintain denominational integrity, call to accountability and repentance, and bring about restoration and healing. These procedures are intended to maintain the integrity of ministerial relationships and protect the vulnerability of those to whom, and with whom, we minister. Abuse and neglect shall be reported to governmental authorities as required by law. These procedures seek to avoid "institutional protection," whereby our theology is ignored, or

the issues are made to go away.[1]

BIC U.S. reserves the right to combine, or skip given procedural steps depending on the facts of each situation and the nature of the concern. The following is a non-exhaustive list of factors that may be considered: the minister self-discloses the misconduct; there are multiple eyewitnesses; the behavior or issue of concern is repeated despite coaching, counseling, or training; the minister's work history; the impact the behavior or issue of concern has on the BIC U.S. as a faith community.

III. Scope and Implementation of this Policy

This policy applies to all credentialed ministers and lead pastors under the authority of the BIC U.S. Leadership Council, with BIC U.S. Leadership Council being responsible for the development and implementation of ministerial misconduct policies, training, and response procedures. The Commission on Ministry and Doctrine serves under the authority of the Leadership Council for the purpose of administering the credentialing process, including the de-credentialing process, should ministerial misconduct warrant de-credentialing (see Articles 1.2 and 1.4).

Regional Conference bishops, in conjunction with the BIC U.S. Human Resources Administrator, are responsible for implementing the ministerial misconduct policy in their conferences, including conducting background checks of all newly credentialed ministers and training ministers serving within their conference in the ministerial misconduct policy. Bishops will work with the BIC U.S. Human Resources Administrator and those serving as Ministerial Misconduct Response Team (MMRT)members within their region to . . .

- Propose updates to the ministerial misconduct policy as needed.
- Maintain supporting resources, forms and protocols related to this policy.
- Develop and administer training materials for credentialed ministers and lead pastors.
- Research and maintain a list of resources for responses and follow-up care.
- Assist with MMRT responses as per protocols.
- Assist with recommended follow-up care on a case-by-case basis.

All credentialed ministers and lead pastors within BIC U.S. are responsible to read and comply with this ministerial misconduct policy.

[1] Rev. Dr. Marie M. Fortune, *Responding to Clergy Misconduct: A Handbook,* (Seattle, Washington: FaithTrust Institute, 2009.) 57

IV. Definition of Ministerial Misconduct[2]

Ministerial Misconduct –

The role of minister inherently carries with it authority and power and the responsibility to use that authority and power for the benefit of the faith community and all those the minister serves. Ministerial misconduct occurs when a minister misuses, intentionally or unintentionally, that entrusted authority with its resources by violating boundaries within their ministerial relationships or by betraying their responsibility of acting in the best interest of those to whom they minister.

Ministers hold significant power in their ministerial roles and relationships. Ministers have "formal" power through their credentials, education, and appointment to ministerial positions, and then they often have "informal" power through their verbal, counseling, and relational skills. As faith leaders, ministers have access to resources (knowledge, expertise, experience,) and influence, to which the congregant may not have access except through the minister. This does not mean that the congregant is powerless, but it does mean that the congregant is likely to be vulnerable in this circumstance and trusting of the integrity of the minister.

The minister is primarily responsible for the boundaries in ministerial relationships. Ordinarily, he/she has the capacity and resources to establish the parameters of the relationship so as to respect the vulnerability of the congregant. Even if a congregant pushes the emotional/sexual intimacy boundaries, the minister has the responsibility to maintain the boundaries.[2]

Ministers are also entrusted with the responsibility of acting in the best interest and well-being of their congregants. The minister has the ethical duty and obligation to act in the best interest of both the one who entrusts and of those who have been entrusted, even if such action is not necessarily in the personal interest of the minister.

Ministerial misconduct is:

A. a violation of entrusted authority and power.
B. a violation of minister's relational boundaries.
C. a violation of the minister's entrusted care.

A. Some examples of violations of entrusted authority and power (not an exhaustive listing)

- Overcoming a congregant's/staff member's will by using guilt or manipulation.
- Using spiritual language to shame a congregant/staff member into compliance.
- Exploiting a congregant's/staff member's desire for the minister's attention or approval.
- Making claims of a special knowledge of God's mind and desires.
- Shunning or withholding spiritual blessing in response to a lack of compliance.
- *Constructive Discharge* – forcing a staff member to resign by making the work environment so intolerable a reasonable person would not be able to stay.
- Misinterpreting doctrine or Scripture to distort meaning.

[2] Much of the content within this section is taken with little alteration from Fortune, *Responding to Clergy Misconduct: A Handbook,* pp 35-49.

B. Some examples of violations of relational boundaries:

- Meeting a congregant/staff member secretly outside of the church.
- Asking highly personal questions, such as inquiring about one's sexual experiences.
- Continue counseling a congregant/staff member whose presenting issues require professional counseling (e.g. sexual trauma, childhood sexual abuse), unless the minister is a professional counselor in that area.
- Initiating or allowing any type of sexually physical contact to occur.

C. Some examples of violations of the minister's entrusted care responsibilities:

Sexual misconduct:

- Sexual harassment: Unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess, or sexual deficiencies; leering, whistling, or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal, or visual conduct of a sexual nature.
- Sexualizing any relationship with a child, congregant, staff member, or persons one is called to serve.
- Continuing a counseling relationship or contact with a congregant/staff member after misconduct or attempts to sexualize the relationship have occurred.
- Sexual innuendos, jokes, and/or comments.
- Stalking.
- Behaving seductively and flirtatiously with congregants/staff members.
- Using information learned in a professional role to manipulate a person.
- Utilizing a relationship with a congregant/staff member to meet personal and emotional needs.
- Holding secrets for the purpose of manipulation, hiding wrongdoing, or demanding the victim's secrecy.
- Demonizing a victim and diverting accountability so that they will not be believed and taken seriously if they disclose the abuse.
- Remaining quiet about a colleague's misconduct.

Credential misconduct:

- Divisively and/or contentiously teaching or promoting statements contrary to the statements of position, doctrine, values, and Christian life and practice that are contained in the *Manual of Doctrine and Government of BIC U.S.*
- Schismatic activities such as rallying people to adopt positions contrary to those decided by the believing community represented by General Assembly.
- Continuing to hold a ministerial position in the BIC U.S. without actively pursuing or maintaining BIC U.S. credentials.

Financial misconduct:

- Using church finances for personal purchases.
- Receiving personal gifts in return for approval.
- Using benevolence funds for personal projects or friends apart from appropriate approval.
- Financial exploitation of congregants.

Harassment misconduct:

- Sexual harassment (see above).
- Epithets, slurs or negative stereotyping.
- Threatening, intimidating or hostile acts.
- Denigrating jokes and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and is placed on walls or elsewhere on the church premises or circulated in the workplace, on work time, or using congregational equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites, or other means.

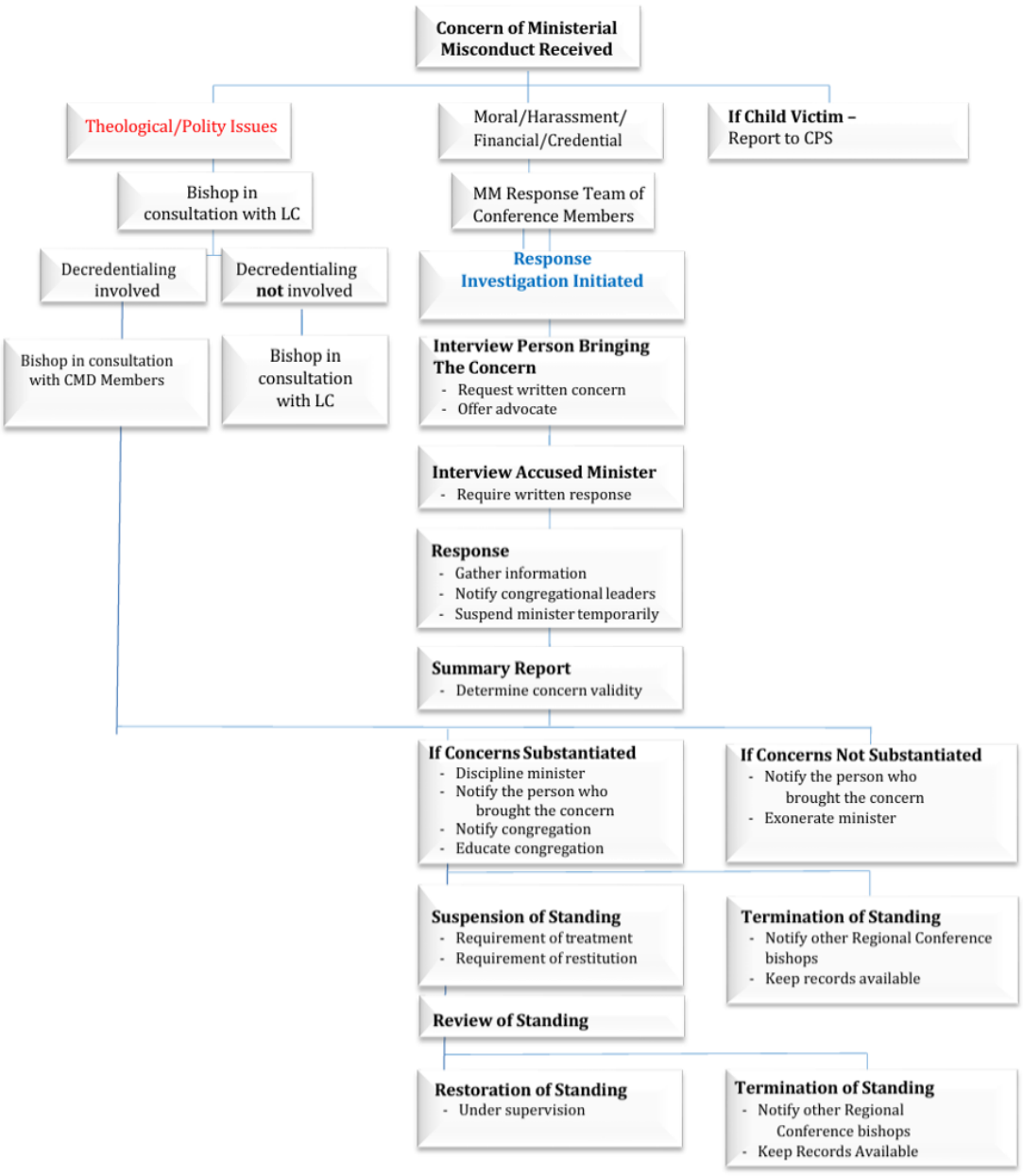
Social media misconduct:

- Contentious and Divisive Language: While content of posts may be widely divergent, the language of posts should remain continuously respectful, avoiding dehumanizing, polarizing, and extreme language. Posts should be made with a goal to understand each other, not primarily to win the argument or to be contentious. The issue is not more important than the relationship (Gal 5:15).
- Verbal bullying: Slandering, ridiculing or maligning a person or his/her family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- Cyber bullying: Intimidation, threats, humiliation, and harassment that takes place through the use of social media, computers, cellphones, or other electronic devices. Examples include sending, posting, or sharing negative, harmful, false, or mean content about someone else and sharing personal or private information that causes embarrassment or humiliation.

The above examples are not exhaustive and there may be areas of ministerial misconduct or abuse not given. BIC U.S. stands against all abuses of power, be it physical, sexual, emotional, financial, spiritual, or other. For further clarification of different types of abuse, see Appendix A – Glossary of Significant Terms.

V. Procedures for Responding to Reports of Ministerial Misconduct

Overview of Procedures for Responding to Ministerial Misconduct Concerns



BIC U.S. encourages the reporting of all perceived incidents of ministerial misconduct, regardless of the respondent's identity or position. Individuals who believe they have been the victims of ministerial misconduct or have witnessed misconduct may report their concerns to their Regional Conference bishop, to a member of the Regional Ministerial Misconduct Response Team (MMRT), or to the BIC U.S. Human Resources Administrator. Concerns of ministerial misconduct will be received with sensitivity, handled with confidentiality on a "need-to-know" basis, and treated seriously. The prompt reporting of concerns, no matter how insignificant, allows for constructive action to be taken before relationships become irreparably strained. Therefore, although no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of misconduct.

Any reported concerns or allegations of ministerial misconduct will be taken seriously and investigated promptly. The investigation may include individual interviews with the parties involved and, when necessary, with individuals who may have observed the alleged misconduct or may have other relevant knowledge.

Confidentiality by BIC U.S. will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting ministerial misconduct, or for participating in an investigation of a claim of misconduct, is a violation of this policy and will be subject to disciplinary action. As referenced above, any act(s) of retaliation should be reported immediately and will be promptly investigated and addressed.

While statistically rare, false, and malicious reports of ministerial misconduct or retaliation (contrasted to those made in good faith, even if erroneous) may be the subject of appropriate disciplinary action.

Step One - Concerns of Ministerial Misconduct Received

Brethren in Christ U.S. respects the responsibility of local congregations to resolve their own matters of concern wherever possible and will work with local congregations to do so whenever possible. However, the Brethren in Christ U.S. has the responsibility and authority to take investigatory and disciplinary action when a complaint or concern is received concerning ministerial misconduct or immoral or unethical behavior in the life of a minister credentialed by the Brethren in Christ U.S. In cases involving non-credentialed ministers, the local congregation, under the direction of the bishop, will be responsible for responding to ministerial misconduct claims.

A report of ministerial misconduct need not be written. There are times when a staff member or congregant brings a formal concern forward to the bishop or a member of the MMRT, either verbally or in writing (using the BIC U.S. Ministerial Misconduct Report Form). However, there are other times when bishops or members of the MMRT may "hear through the grapevine," of general remarks of ministerial misconduct. Whether a formal or informal complaint is received, the following response process will be enacted:

A. Reports of ministerial misconduct that involve child abuse/neglect will be reported to Child Protective Services for investigation. Reports of ministerial misconduct that involve abuse/neglect of vulnerable adults will be reported to Adult Protective Services for investigation. Church

leadership should inform Protective Services that prompt actions will be taken to prevent further abuse/neglect in the ministerial setting, which may require communicating with the alleged offender in a timely manner. Guidance from Protective Services on preferred procedures in dealing with the victim and the alleged offender should be received before taking next steps.

BIC U.S. will similarly respond to historical reports of child abuse from adults who report experiencing sexual abuse as a child under a BIC U.S. licensed minister or lead pastor. Historical reports of other types of abuse will follow the investigative procedures outlined in this policy.

B. Reports of ministerial misconduct of a theological/polity nature will initially be addressed by the bishop in appropriate consultation with Leadership Council and the National Director.

C. When a report of ministerial misconduct involving moral or harassment issues is received by the bishop, a member of the MMRT, or the BIC U.S. Human Resources Administrator, appropriate consultation will be held promptly (usually within 48 hours) with the bishop and the MMRT members of that region (perhaps including the National Director or Leadership Council members depending on the claim), to document and assess four critical areas: assessing safety, assessing appropriate (even if temporary) boundaries and accountability, instituting any appropriate care, and determining needed support from organizations with more experience and expertise (whether this be independent consultation and/or independent investigation.

Responses will be conducted promptly. The appropriate deadline for completing the response will be established even before the response begins. Responses should be conducted as expediently as possible (ideally within a range of 5 to 60 days).

Individuals reporting concerns, victims, and respondents all face vulnerable circumstances during investigative and disciplinary activities and therefore, counsel and care should be offered wherever possible to victim(s), respondent(s), and the congregation(s) that may be involved. It is important to protect confidentiality and to be as fair as possible in each situation.

Step Two - Response Investigation Initiated

In many cases the team members of the MMRT will be called upon to conduct a response investigation. MMRT members will be trained in conducting trauma-informed interviews and investigations. Investigations are to be driven by a motive for justice-making whereby BIC U.S. seeks to keep faith with its members, respond quickly and appropriately to concerns, take action to appropriately protect and respect all persons involved, maintain denominational integrity, call for accountability and repentance, and bring about restoration and healing. These procedures are intended to maintain the integrity of ministerial relationships and to protect the vulnerability of those to whom, and with whom, we minister. Interviews are to seek to avoid "institutional protection."

Step Three - Interviewing the Individual reporting the concern[3]

The interview of the individual reporting the concern is perhaps the first interview that will be conducted. This interview, and all others, will be conducted in a private, neutral meeting space.

After ***the individual reporting the concern*** is interviewed and prior to interviewing other witnesses and the respondent, the response team should again document and assess four critical areas: assessing safety, assessing appropriate (even if temporary) boundaries and accountability, instituting any appropriate care, and determining needed support from organizations with more experience and expertise (whether this be independent consultation and/or independent investigation).

Follow Up With Other Possible Sources of Evidence[4]

The response team will consider whether any other sources of evidence exist that could aid in the investigation process and then gather any such evidence. If the evidence is in the possession of either the victim or the respondent, the response team will ask that the evidence be shared with them.

Some examples of physical evidence that may aid in the investigation process are:

- Timecards
- Calendars or diaries
- Telephone records
- Travel logs
- Expense reports
- Notes, letters, cards, and/or handwriting samples
- Emails, voicemails, and text messages
- Computer files and computer log-in/log-out information
- Internet usage
- Security/surveillance video
- Building entry/exit swipe information
- Recordings
- Photos
- Offensive material at issue (magazines, calendars, postings, emails, etc.)
- Personal gifts
- Timing of the incident (e.g., just before or after a performance appraisal or just before or after the respondent is rejected by the individual reporting the concern or vice versa)
- Physical evidence, such as maps or relative locations of the parties or the areas in which the victim and others work

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[3] Mimi Moore, "Investigating Claims of Harassment: A Step-By-Step 'How To' – Part 2: Interviewing The Complainant and Planning the Remainder of the Investigation," BCLP, January 31, 2018, accessed August 5, 2020, https://bclpatwork.com/2018/01/investigating-claims-of-harassment-a-step-by-step-how-to-part-2-interviewing-the-complainant-and-planning-the-remainder-of-the-investigation/

[4] Mimi Moore, "Investigating Claims of Harassment: A Step-By-Step 'How To' – Part 4: Other Sources of Evidence, Summarizing the Investigation and Reaching a Conclusion," BCLP, February 20, 2018, accessed August 5, 2020, https://bclpatwork.com/2018/02/investigating-claims-of-harassment-a-step-by-step-how-to-part-5-other-sources-of-evidence-summarizing-the-investigation-and-reaching-a-conclusion/

- Prior performance evaluations
- Documents containing other reports of ministerial misconduct by the individual reporting the concern, other reports about the respondent, prior investigations involving the same persons, recent adverse actions for people involved and any other documents that would be helpful to the investigation.

Step Four - Interviewing the Respondent

The interview of the respondent will also be carefully planned beforehand and conducted in a private, neutral meeting space.
After the ***respondent*** is interviewed, the response team will decide again whether to recommend that any immediate action be taken pending the outcome of the investigation. *It may be advisable to place the respondent on administrative or investigatory leave or to allow the individual reporting the concern voluntary leave during the response investigation. Failure by the respondent to comply with any arrangements or terms for a temporary leave of absence will result in immediate suspension of credentials and an immediate leave of absence without pay.* If such action is decided, the bishop will work with the local church board for implementation of this decision.
The bishop will appoint a member of the MMRT/Leadership Council to serve as point person for responding to public ("media") inquiries regarding the response.

In determining how to proceed the response team may again consider the following: whether they should continue by providing a counselor/advocate to provide support to the respondent (and/or family), interview a third-party witness or witnesses (particularly if the conduct is recent and public), discover whether the respondent had any reports made at other places where the minister served, gather objective evidence (performance evaluations, emails, notes, visuals in the work place, travel records, etc.), or consult with legal counsel.

In addition to collecting objective evidence, other witnesses may be interviewed. It may be necessary to interview people more than one time depending on additional information that is gathered.

If the respondent resigns from their ministerial position before the investigation is completed, the investigation will continue through to completion. Results will be documented, and appropriate follow-up will be made.

Step Five – Interviewing Other Witnesses

It is important to interview those persons identified by the individual reporting the concern and the respondent as having relevant knowledge and then to further interview others identified by those interviewees as having relevant information to the case, without unreasonably prolonging the investigation.

Step Six – Ministerial Misconduct Response Team Summary Report

A. Maintaining Response Investigation Documentation

It is important for the response team to keep proper documentation of the response investigation in case the response investigation is revisited in the future. The interviewer's notes should be legible and complete, signed, and dated. All of the steps that have been taken to investigate the concern or situation should be documented and should include all sources of documentary or other evidence used during the response investigation.

It is usually advisable to put all this information in a detailed timeline.

All documentation and reports of the response investigation should be retained in a confidential file separate and apart from any of the personnel files of the employees involved in the investigation. Documentation of exoneration, corrective action, or discipline measures may be placed in the personnel file of the alleged, if appropriate.

B. Reaching a Conclusion

After all interviews are concluded, and all documentation or other evidence has been reviewed and considered, a conclusion must be reached. Issues upon which the response team may need to reach a conclusion include:

- whether the alleged misconduct occurred;
- whether the misconduct that occurred violated BIC U.S. ministerial expectations;
- the severity of the misconduct;
- the pervasiveness of the complained-of behavior; and
- the degree of physical or mental harm or danger, if any, caused by the misconduct.

The response facilitator should document the complaint made, a summary of the investigation conducted, conclusions reached, the reasoning behind those conclusions, and the recommendations considered. The response team will share its findings in a written *MMRT Summary Report* with the Regional Conference bishop for appropriate follow up.

Responding to Ministerial Misconduct

A. Disciplinary and Corrective Follow Up

Misconduct did not occur

If it is concluded that the misconduct did not occur, or that the behavior did not qualify as ministerial misconduct, the minister should be exonerated and documentation of this exoneration placed in the minister's file.

Cannot conclude misconduct occurred

If the response team cannot conclude that misconduct occurred, it is best practice to remind the respondent of BIC U.S. ministerial expectations and requirements according to the *Brethren in Christ U.S. Manual of Doctrine and Government* (Article 1.1). It is also usually a good idea to put a memo in the respondent's file, advising that a complaint was made, that it was not concluded that misconduct occurred, and the respondent was reminded of BIC U.S. ministerial expectations and requirements. This is often the easiest way to be able to check to find out if a prior accusation of misconduct has been made.

Misconduct did occur

If a violation of BIC U.S. ministerial expectations and requirements has occurred, appropriate disciplinary and corrective action that seeks to be just should be determined by the Regional Conference bishop (in consultation with Leadership Council or Conference Board of Directors, as deemed appropriate) and will involve taking into consideration any previous conduct and the attitudes of those involved.

With regard to the disciplinary protocol in this manual, the Brethren in Christ U.S. determines its own ecclesiastical standards, procedures, practices, and rules, which need not follow the standards, procedures, practices, and rules of secular courts.

Disciplinary and corrective action taken should be just, and proportional to that given to other ministers who have engaged in similar misconduct. The most typical forms of disciplinary and corrective action include written warnings, de-credentialing, suspensions, requirement that the respondent enter a mentoring relationship, receive further training or counseling, restitution, removal from supervisory role, and/or termination. Documentation of the disciplinary action should be placed in the minister's personnel file.[5]

- **Written warnings** may be given to the minister and placed in the minister's personnel file. Without revealing details, if they are known, information that a written warning was sent to the person may be shared with congregations or groups who inquire as to the ministry history of the person.

- **Suspension of Credentials**. Leadership Council may recommend a removal of credentials with BIC U.S. for a specific period of time in order to implement a program of discipline, reinstatement, and restoration. The disciplinary act of suspension allows for the potential reinstatement of the respondent's accreditation, providing that he or she has given clear evidence of genuine repentance and has fulfilled all the requirements recommended by Leadership Council. When credentials are restored the credential holder will be subject to all requirements of holding credentials (place of assignment, etc.). Restoration of credentials does not guarantee employment or a pastoral position.

- **Suspension Timelines** – With all concerns involving sexual misconduct or sexual abuse of any kind, suspension of ministry and credentials with BIC U.S. will occur for a period of time not less than six months and not exceeding three years from the date of notification before any request for reinstatement would be considered in order to underscore the seriousness of the offence and to implement an appropriate program of discipline and restoration by Leadership Council. Unless extended by the conference bishop in consultation with Leadership Council at the end of the suspension period, the respondent's credentials with BIC U.S. may be either reinstated or permanently withdrawn.

  In cases involving other ministerial misconduct or unethical behavior, suspension of ministry and credentials with BIC U.S. may occur. If suspended, the time of suspension

[5] The following section on types of discipline paraphrased from, *Discipline and Reconciliation Manual*, Be In Christ Church of Canada, 2019, 6–7.

shall be for a period of time not less than three months and not exceeding three years from the date of notification in order to underscore the seriousness of the offence and to implement an appropriate program of discipline by Leadership Council. Unless extended by the conference bishop in consultation with Leadership Council at the end of the suspension period, the respondent's credentials with BIC U.S. may be either reinstated or permanently withdrawn.

- **Suspension Regulations** - The conditions of the suspension of credentials must be clearly stated in writing. Written notice of the suspension of credentials must be given to both the minister and the leaders of the local congregation or organization involved. Any suspension of credentials must be reviewed at the end of the stated suspension period. If the respondent does not give clear evidence of genuine repentance or fails to fulfill the program of discipline recommended by Leadership Council, and accepted by the conference bishop, a further period of suspension will be required, not to exceed one year, or credentials may be permanently revoked.

  Pastoral Care - The Conference bishop may choose to assign a "mentor" to the minister for the period of time in which the minister's credentials are suspended.

  Any and all ministry associated with pastoral care in any form (e.g. preaching, counseling, teaching, and visiting) within BIC U.S. must not take place until such time as the person is fully reinstated. Because the respondent is no longer credentialed by BIC U.S. during the said suspension, license(s) (e.g. to perform marriages) requiring denominational credentials will be revoked.

  The suspension of the minister's credentials by BIC U.S. shall mean (unless otherwise indicated in writing by the conference bishop) that his or her name will not be listed as one available for ministry.

- **Termination of Standing**: This disciplinary action is the most severe discipline that the bishop can impose. The bishop, with approval from Leadership Council, permanently revokes the credentials of the minister to practice within the denomination.

  The final step after termination is to notify other regional conference bishops within the denomination that this step has been taken and that this person no longer serves as a minister within the denomination. The national office will track this information, keeping records of the misconduct in a secure location separate from personnel files for future reference.

B. Appeals Process

A person who alleges brotherhood infractions or other misconduct that has not been resolved at the personal, congregational, or Regional Conference level may appeal to General Conference Board according to a process prescribed and overseen by the Board to resolve the matter. (*Manual of Doctrine and Government,* 13.6 Appeals). This appeals process allows for the introduction of new information that may not have been known at the time of the original response investigation and summary.

C. Appropriate Closure[6] and Further Review of Standing

Once the response has concluded, it is essential to close the response investigation with the individual reporting the concern, each witness, and the respondent. It may also be prudent, in some circumstances, to follow up with the entire local congregation, or as publicly as the misconduct has gone.

All close-out meetings that are held should be documented. When closing the response with the individual reporting the concern, and generally with each witness, here are the key points to tell each person:

- We are closing our response investigation based on the information as we know it now.
- BIC U.S. has a strong ministerial misconduct and retaliation policy.
- BIC U.S. takes claims of ministerial misconduct seriously and follows up to stop it, if we can conclude that misconduct occurred.
- (If appropriate:) BIC U.S. has taken action on the complaint that we received, but we are not free to disclose any disciplinary action taken toward the respondent. BIC U.S. may find it appropriate to tell the individual reporting the concern more, such as specific actions taken, in order to help reassure the individual reporting the concern that reasonable steps have been taken to end the conduct and prevent its recurrence, and/or to inform the individual reporting the concern of any limitations or restrictions on interaction with the respondent.
- The law, as well as BIC U.S. policy, prohibits retaliation toward a individual reporting the concern for bringing forward a concern, or toward witnesses for providing information about a reported concern. If an individual feels that retaliation has occurred in the future, they should contact their regional conference bishop or member of the Ministerial Misconduct Response Team.
- Thank you (for the individual reporting the concern) for bringing your concerns forward and giving us the opportunity to address them. (For the witness) … for answering our questions and assisting with this response investigation.

Similarly, when closing the investigation with the respondent, it is important to emphasize the BIC U.S. anti-retaliation policy, and even if it is determined that no misconduct occurred, the respondent should be informed that the conduct was perceived as misconduct and reminded of BIC U.S. expectations and requirements.

The bishop, or their designee, will schedule a follow-up with the individual reporting the concern to communicate the conclusions reached and actions to be taken. Periodic meetings with the individual reporting the concern for several months may be appropriate to ensure that the misconduct has stopped and that no retaliation has been suffered and document that follow-up as well.

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[6] Mimi Moore, "Investigating Claims of Harassment: A Step-By-Step 'How To' – Part 6: Closing the Investigation and Additional Steps Thereafter," BCLP, February 27, 2018, accessed August 5, 2020, https://bclpatwork.com/2018/02/investigating-claims-of-harassment-a-step-by-step-how-to-part-6-closing-the-investigation-and-additional-steps-thereafter/

VII. Final Filing of Response

Set up a separate file for each investigation, which should typically contain:

- Log of your actions, including all meetings and calls by date and time.
- Contemporaneous and final interview notes for each witness, as well as notes for each meeting with the individual reporting the concern and the respondent.
- Notes or copies of all communications to and from witnesses, including individual reporting the concerns.
- All witness statements.
- Any written reports of ministerial misconduct.
- All documents which establish or refute issues investigated.
- Relevant physical evidence, such as e-mail, photos, etc.
- Your report, if any(A summary report should be prepared for complex investigations and should include information about the complaint, factual findings, timetable of the investigation, recommendation and any action taken).
- Documents reflecting notification of investigation results and any remedial action.
- Copy of Policy (in case policy changes in future).
- Copy of acknowledgement form indicating that respondent received harassment policy.
- Notes about closing meetings with individual reporting the concern and witnesses.
- Notes about follow-up meeting(s) with individual reporting the concern or others.

All ministerial misconduct files will be maintained in a locked location, separate from personnel files. Each time a new complaint of misconduct is made, the response investigator should check to find out whether a prior complaint of misconduct has ever been made against the respondent and, if so, should become familiar with the details and results of any such investigations.

Appendix A - Glossary of Significant Terms[1]

Abuse: In general, abuse occurs when a person in a position of power and/or trust (e.g. pastor, elder, boss, mentor, supervisor, parent, adult, older child, etc.) uses that position to exploit or violate someone who is more vulnerable (e.g. a child, someone who is sick, elderly, or disabled, student, supervisee, intern, immigrant, etc.). That exploitation or violation can take a variety of forms such as emotional, financial, physical, sexual, spiritual, etc.

Adult: A person who by virtue of attaining the legal age of majority, generally eighteen, is regarded in the eyes of the law as being able to manage his or her own affairs.

Child: A person who has not attained the legal age of majority, generally less than 18 years of age.

Credentialed Minister: BIC U.S issues ministerial credentials to individuals in the following categories—a licensed minister (and a retired licensed minister), an ordained minister (and a retired ordained minister), and a commissioned minister. All candidates for these ministry credentials are required to meet the qualifications for BIC U.S. ministers contained in Article 1.1 and to follow the processes established by the authority of Leadership Council and administered by the Commission on Ministry and Doctrine.

The credentialing processes established by the BIC U.S. include periodic renewals of credentials. BIC U.S. does not issue credentials for life but only for the time that a minister serves in positions approved by Leadership Council. Periodic renewals require ministers to continue to meet those same qualifications first required in becoming credentialed with BIC U.S. (See Foundational Concerns above).

Credentials may be used by ministers as long as they continue to meet the qualifications given by BIC U.S. Much like a business credit card, credentials are not for personal use. Credentials are to be used on behalf of and in service of the purposes and values of the BIC U.S., not for personal purposes, values, or beliefs. Credentials are issued to ministers with the professional understanding that they will not misuse those credentials in pursuit of personal motives or ambitions.

Emotional Abuse: A pattern of controlling behaviors such as shaming, insulting, degrading, intimidating, threatening, humiliating, and/or domineering. Bullying is a common term for acts that typically constitute emotional abuse.

Financial Abuse: The illegal or improper use of a vulnerable person or his/her financial resources for another's profit or advantage. Some examples of financial abuse may include: the taking of money or property; forging a signature; getting a person to sign a deed, will or power of attorney through deception; coercion or undue influence; or, illegally or improperly adding names to bank accounts or safety deposit boxes. The elderly in particular are often targeted for financial abuse.

Harm: The endangerment or impairment of the health or welfare of another/others.

Harassment: Verbal, written, or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, gender, national origin, age, disability, marital status, citizenship, genetic information or any other characteristic protected by law or that of his/her relatives, friends or associates, and that a) has the purpose or effect of creating an

intimidating, hostile or offensive work environment; b) has the purpose or effect of unreasonably interfering with an individual's work performance; or c)otherwise adversely affects an individual's employment opportunities. It is a bona fide job requirement for all employees of the BIC U.S. to be Christians, and to base their lifestyle on biblical teaching. BIC U.S. does not tolerate harassment based on religion.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on BIC U.S. time or using BIC U.S. equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

Inappropriate behavior: Interactions between persons which cause concern for the safety of one of those persons, without meeting the definition of abuse. Behaviors such as physical aggression, verbal aggression, inappropriate ongoing communications via electronic (social) media, and adult activities generally classified as "grooming behaviors."

Ministerial Misconduct Response Team (MMRT): Team of volunteers within a BIC U.S. Regional Conference chosen carefully by the Regional Conference bishop, in consultation with Leadership Council. The MMRT will consist of at least three persons, of which there will be at least one female, at least one male, and one person will serve as the facilitator. The MMRT may include a person or persons from outside BIC U.S., depending on the severity of the concerns. Members of the MMRT will be trained in receiving Ministerial Misconduct concerns, conducting response investigations, and writing summary reports. There is no time limit given for serving as an MMRT member, but this will be left to the discretion of the bishop. See the full job description attached.

Offender: A person who has been concluded to have breached the BIC U.S. Ministerial Misconduct policy.

Physical Abuse: Non-accidental physical injury (ranging from bruises to severe fractures or death) by way of bodily contact (such as slapping, punching, pushing, beating, kicking, shaking or striking with an object) or non-injurious contact with the goal or effect of intimidating, threatening, or controlling.

Response: An established process which is initiated in response to any allegation or report of ministerial misconduct.

Respondent (Alleged Offender): A person against whom a complaint has been reported/filed.

Retaliation: When a person in a position of authority takes negative action against someone under their authority who files a formal complaint about discrimination or harassment.

Risk: An assessment of both the probability and consequence of an event occurring either immediately or in the future. Risk may be categorized in general terms as high, medium, and low, or acceptable and unacceptable.

Sexual Abuse: When a person in a place of power and/or trust, engages in sexual behavior with a child or an adult under their supervision, authority, mentoring, or spiritual care, including:

Sexual Penetration – Any act or attempted act of vaginal or anal penetration, however slight, by a person's penis, finger, other body part, or an object, and/or any oral-genital contact.

Sexual Contact: Any intentional touching of a person's breasts, buttocks, groin, genitals, or other

intimate parts. Touching may be over or under clothing and may include the touching or making the person touch, or making the person touch their own body. This also includes contact with non-sexual areas of the body for the sexual gratification of the perpetrator (such as with certain paraphilic disorders).

Non-Contact Sexual Acts:

- observing a person's nudity or sexual activity or allowing a person to observe sexual activity;
- recording, photographing, transmitting, showing, viewing, streaming, or distributing intimate or sexual images, audio recordings, or sexual information of persons; or
- exposing one's genitals or inducing a person to expose their own genitals
- communicating sexual desire or sexually stimulating content toward a person within a power dynamic (boss-employee, doctor-patient, teacher-student, pastor-congregant, adult-child)

A child cannot consent to any sexual behavior with an adult or older child. An adult under the authority, care, or mentorship of a leader cannot consent to sexual activity. Even when both people are adults and the contact is not forcible, any crossing of sexual boundaries within a power structure is not an "affair" or a "relationship" but an egregious abuse of power. Adult sexual abusers often develop an emotional and spiritual connection and then exploit it. While not always recognized as a crime according to state laws, this is a serious violation and BIC U.S. will treat it as such.[7]

Sexualized Behavior: Sexualized behavior is behavior that communicates sexual interest and/or content. Examples include but are not limited to displaying sexually suggestive visual materials, use of pornography in church programs on or with church property, making sexual comments or innuendo about one's own or another person's body, touching another person's body/hair/clothing, touching or rubbing oneself in the presence of another person, kissing, and sexual intercourse.

Sexual Harassment: The legal definition of Sexual Harassment by the US Equal Employment Opportunity Commission (1980) is "Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

1. submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
2. submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual.
3. such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment."

Beyond the legal definition, harassment, sexual or otherwise, can also occur in a community, conference, or event when the people involved are not employees of the church. In accord with our values, sexual harassment is not restricted to what is defined as sexual harassment under the law. BIC U.S. considers any unwanted sexualized behavior or sexualized behavior within a power differential to be a serious form of harassment (including unwanted touch or communication, other unwanted sexual attention, or any behavior that objectifies or degrades.)

Sexual Misconduct: This term is often used to describe sexualized behavior by a professional (coach, teacher, pastor) towards someone with less power. It may or may not be criminal in nature. It includes a spectrum of behaviors from boundary violations (a youth pastor asking a youth on a date), to sexual harassment (a pastor making sexualized comments with or about a congregant), to sexual abuse.

[7] Godly Response to Abuse in Christian Environments (G.R.A.C.E.), "Full Abuse Policy."

Any sexualized behavior of a church leader towards a congregant or youth is sexual misconduct regardless of whether there was perceived consent or given consent. It is a breach of fiduciary duty. Similar to therapists and counsellors, church leaders must abide by the professional code of ethics held by their denomination or congregation, which does not tolerate any sexual contact with those whom they are serving.

If the individual experiencing clergy misconduct is a minor, it must be immediately reported to the police or child welfare authorities.

Spiritual Abuse: A form of emotional abuse using religion. Many acts of abuse in a religious environment will have a spiritual dimension. Examples include:

- Use of religious ideology, precepts, tradition, or sacred texts to harm.
- Compelling a person to engage in religious acts against his or her will.
- Abuse that occurs in a religious context or by a religious leader.
- Invoking of divine authority to manipulate a person into meeting the needs of the abuser.
- Using spirituality or spiritual authority to dismiss a person's perspective, agency, or value.
- Attempts to use the divine, sacred texts, sacred tradition, theology, or spirituality to put their leadership or decisions beyond questioning or accountability.
- Attempts to spiritualize or justify harm using the divine, sacred texts, sacred tradition, theology, or spirituality.

Stalking: A pattern of unwanted, fixated, and obsessive behavior which is intrusive and causes fear of violence, alarm, or distress. Stalking is a terrifying reality and is now recognized as a crime in all fifty states.

Examples of stalking include (from The Justice Department's Stalking Victimization Survey):

- Making unwanted phone calls/texts or sending unwanted messages or emails.
- Following or spying on the victim.
- Showing up or waiting at places without a legitimate reason.
- Leaving unwanted items, presents, or flowers.
- Posting information or spreading false or confidential information about a person or victim on the internet, in a public place, or by word of mouth.

Victim: A person who has suffered harm.

Witness: A person who has observed behaviors or heard statements made by other persons which are deemed material to a response for ministerial misconduct.

C.3 External Standards & Professional Materials

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STATEMENT OF FINDINGS
BRETHREN IN CHRIST ASSESSMENT

Personal and Confidential

TO: Ms. Greta Kibler Roberts

DATE: May 27, 2026

FROM: Telios Law, PLLC

RE: Allegations against Rev. Hoke of failure to respond to child abuse allegations

I. Overview

A. Commissioning Investigation

The leadership of Brethren in Christ commissioned a review of allegations of failure to respond adequately to reports of child abuse. Ms. Greta Kibler Roberts alleged that around 47 years ago, at the age of 17, she reported emotional negligence and physical abuse to Rev. Ken Hoke, a youth pastor at the time. She states that he did not follow up adequately, failed to make a mandated report, and failed to take the allegations seriously.

After Godly Response to Abuse in a Christian Environment (GRACE) failed to complete a third-party investigation, Brethren in Christ asked Telios Law for an assessment of the situation under its Ministerial Misconduct Policy. A failure to address allegations of child abuse is encompassed by its provisions.

II. Findings

Mrs. Rachel Kibler, Greta's mother, was known as a dominant and demanding person. When Greta made her complaint to Rev. Hoke, he was a 29-year-old associate pastor. Greta reported that the children were being hit and mistreated, and asked that they be removed from the home.

Rev. Hoke talked to Gary Shuey, who was the leader of Child and Youth Services (CYS) for the county. He informed Rev. Hoke that he did not have the resources to take the children from the home, and per their policy, CYS tried to keep children in the family. Also, at the time, clergy were not mandated reporters.

Rev. Hoke talked to other church leaders, who stated he should not be involved because of Mrs. Kibler's potential antagonism. They would handle it instead. This included the Beachy brothers. The Beachys and Ken Hoke, with some other people, confronted the Kiblers, who denied the allegations and said they didn't know what the group was talking about. Witnesses did not see outward signs of abuse at the time that might have triggered further action. Dr. Stan Beachy offered Greta a home, and she went to live in the Beachy home for some months.

III. Conclusions

According to the standards of child safeguarding of that time, the response of Rev. Hoke, Dr. Beachy, and the church was robust. The abuse was reported, the church attempted to intervene, and Greta was removed from the home. While more would likely be done with options available today, Rev. Hoke did not exhibit ministerial misconduct in what he did.

Sincerely,



Theresa Lynn Sidebotham, Esq.
Telios Law PLLC

C.4 Firefly Administration Materials

FIREFLY – ISAI

[redacted]

INVESTIGATOR SERVICES AGREEMENT

Date of Agreement: April 27, 2026

This Agreement is entered into by and between:

Firefly Independent Sexual Abuse Investigations [redacted] Pennsylvania (hereinafter referred to as "FIREFLY") and **Greta Roberts,** [redacted] (hereinafter referred to as "CLIENT")

A. Scope of Services

1. Retention and Purpose

The CLIENT hereby retains FIREFLY to conduct an independent, third-party investigation to examine whether clergy members, staff, or volunteers of the Carlisle Brethren in Christ Church (hereinafter referred to as "BIC") individually committed acts of institutional betrayal[1], emotional misconduct, or failure to report child abuse[2], and whether individuals in positions of authority within the church engaged in actions to conceal reports of child abuse or otherwise contributed to failures to report, thereby exacerbating harm to victims and undermining institutional accountability, including the

[1] Definition of Institutional Betrayal for purposes of this Agreement, *Institutional Betrayal* shall mean wrongdoing perpetrated by an institution upon individuals who depend on that institution for safety, care, or accountability. This includes but is not limited to: Failure to prevent harm when the institution had a duty of care, Failure to respond adequately or supportively to reports of abuse or misconduct, Active concealment or minimization of abuse, misconduct, or systemic failures; and Actions or omissions that compound harm by prioritizing institutional reputation over the well-being of victims. This definition is intended to ensure that FIREFLY's investigation addresses not only individual misconduct but also the systemic failures and concealment practices that may have exacerbated harm within the BIC.

[2] For purposes of this agreement, "child abuse" shall have the meaning assigned in 23 Pa. Cons. Stat. § 3303, which states:, "child abuse" is defined as intentionally, knowingly, or recklessly doing any of the following: Causing bodily injury to a child through any recent act or failure to act. Fabricating, feigning, or intentionally exaggerating or inducing a medical symptom or disease which results in a potentially harmful medical evaluation or treatment to the child through any recent act. Causing or substantially contributing to serious mental injury to a child through any act or failure to act or a series of such acts or failures to act. Causing sexual abuse or exploitation of a child through any act or failure to act. Creating a reasonable likelihood of bodily injury to a child through any recent act or failure to act. Creating a likelihood of sexual abuse or exploitation of a child through any recent act or failure to act. Causing serious physical neglect of a child. Engaging in any of the following recent acts: Kicking, biting, throwing, burning, stabbing or cutting a child in a manner that endangers the child. Unreasonably restraining or confining a child, based on consideration of the method, location, or the duration of the restraint or confinement. Forcefully shaking a child under one year of age. Forcefully slapping or otherwise striking a child under one year of age. Interfering with the breathing of a child. Causing a child to be present at a location while a violation of 18 Pa.C.S. § 7508.2 (relating to operation of methamphetamine laboratory) is occurring, provided that the violation is being investigated by law enforcement. Leaving a child unsupervised with an individual, other than the child's parent, who the actor knows or reasonably should have known: Is required to register as a Tier II or Tier III sexual offender under 42 Pa.C.S. Ch. 97 Subch. H (relating to registration of sexual offenders), where the victim of the sexual offense was under 18 years of age when the crime was committed. Has been determined to be a sexually violent predator under 42 Pa.C.S. § 9799.24 (relating to assessments) or any of its predecessors. Has been determined to be a sexually violent delinquent child as defined in 42 Pa.C.S. § 9799.12 (relating to definitions). Has been determined to be a sexually violent predator under 42 Pa.C.S. § 9799.58 (relating to assessments) or has to register for life under 42 Pa.C.S. § 9799.55 (b) (relating to registration). Causing the death of the child through any act or failure to act. Engaging a child in a severe form of trafficking in persons or sex trafficking, as those terms are defined under Section 103 of the Trafficking Victims Protection Act of 2000 (114 Stat. 1466, 22 U.S.C. § 7102.

compounding of trauma experienced by child abuse survivors as a result of delayed disclosure, concealment, or inaction.

FIREFLY shall also assess whether the church took appropriate steps to protect children from abuse and whether any failures to report contributed to continued harm.

This assessment will be conducted with impartiality, rigor, and sensitivity to survivor testimony, ensuring that findings reflect both the factual record and the broader systemic implications for the BIC Church.

2. Online Survey

FIREFLY will develop and host a public online survey on its website, accessible to the broader BIC community—both current and former members—to support the investigation team in gathering information relevant to the scope of this inquiry. The survey will be designed with input from the survivor and their advocates to ensure that its structure, language, and content reflect trauma-informed principles and align with the goals of the investigation.

3. Investigative Independence and Trauma-Informed Methodology

As a third-party investigator, FIREFLY will ensure an impartial and independent review of the allegations, free from conflicts of interest and grounded in established investigative standards. To safeguard this independence, FIREFLY maintains full decision-making authority over investigative steps, applies consistent, evidence-based methodologies, and documents all procedures to demonstrate neutrality and transparency. FIREFLY also adopts and applies the six trauma-informed principles established by the U.S. Department of Health and Human Services' Substance Abuse and Mental Health Services Administration[3] (herein after referred to as "SAMHSA")—Safety; Trustworthiness and Transparency; Peer Support; Collaboration and Mutuality; Empowerment, Voice, and Choice; and Cultural, Historical, and Gender Responsiveness—in all investigative activities. These principles guide FIREFLY's approach to promoting physical and emotional safety, fostering trust, reducing power imbalances, supporting participant autonomy, and ensuring culturally responsive engagement. FIREFLY's trauma-informed collaboration with the survivor enhances the accuracy and reliability of the investigative process while preserving the integrity and independence of the investigation. Throughout the process, FIREFLY will conduct its work independently of the CLIENT while upholding rigorous, trauma-informed investigative practices.

4. Timeframe of Inquiry

While the primary focus shall be on the period beginning with the initial allegations in 1975 and continuing to the present, FIREFLY is authorized and expected to examine any credible allegations of physical abuse, sexual abuse, or emotional misconduct, arising outside this period—whether preceding or following the stated dates—to ensure a comprehensive and impartial inquiry.

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[3] 6 Guiding Principles to a Trauma Informed Approach [2022]
Centers for Disease Control and Prevention (U.S.). Center for Preparedness and Response
2022/06/02 | Office of Readiness and Response (ORR)
https://stacks.cdc.gov/view/cdc/138924

5. **Investigation Outcomes Reflecting Survivor-Identified Priorities**

FIREFLY will complete the investigation initiated in 2025 by the BIC Church (BIC) and GRACE (Godly Response to Abuse in a Christian Environment) and will produce a comprehensive written report detailing its findings. This report will directly reference and evaluate the investigation through the lens of SAMHSA's trauma-informed principles and will include an assessment of how the BIC applied its own Child Protection Policy during the period in question. FIREFLY will examine whether an adequate Child Protection Policy was in place, how effectively it was implemented, and what actions the BIC could have taken to better fulfill the policy's intent. The investigation will also identify areas where the BIC failed to address child protection concerns, including the extent to which the organization focused on Ministerial Misconduct policies rather than Child Protection obligations. Additionally, FIREFLY will evaluate the BIC's communication with the survivor both at the time of the original harm, approximately 48 years ago, and throughout the past year. These components will collectively define the investigation's required outcome and serve as the basis for FIREFLY's final report.

6. **Additional Allegations**

If, during the course of the investigation, FIREFLY learns of other potential or alleged victims or perpetrators of sexual misconduct, physical abuse, emotional misconduct, or professional boundary violations that are directly or indirectly related to the BIC Church, FIREFLY shall investigate those allegations as well.

7. **Institutional Accountability**

This investigation is intended to support the BIC Church's commitment to transparency and accountability. It shall serve as the foundation for an independent review process enabling the Church to assess institutional responses, identify systemic failures, and implement appropriate reforms.

B. Limitations and Amendments to Scope

This engagement is limited to the scope expressly defined and agreed upon by the parties in this Agreement. Recognizing that investigative processes may evolve as new information emerges, any material modifications to the scope must be documented in writing and formally executed by both parties.

C. Fees and Billing

The CLIENT agrees to pay all fees and costs incurred as a result of this investigation. As such, the CLIENT agrees that FIREFLY is empowered to perform said services for and on behalf of the CLIENT and to do all things necessary, appropriate, or advisable in performing said services for and in the CLIENT'S best interests. The parties hereby agree that the CLIENT has requested the following investigative services under this Agreement, which FIREFLY will provide.

The CLIENT shall remit [redacted] Dollars [redacted] to FIREFLY as an initial retainer to commence investigative services on or about May 20th, 2026, contingent upon receipt of said retainer. FIREFLY will issue an invoice for the retainer upon execution of this Agreement. After the retainer is exhausted, CLIENT will be invoiced biweekly for services rendered. Payment is due within two weeks of receipt.

Service Rates:

- **Investigative Services:** [redacted] per hour (total, not per person), including interviews, inquiries, background checks, online investigations, travel time, database research, report writing, and client conferences. CLIENT agrees to pay all fees and costs incurred and authorizes FIREFLY to perform all necessary services in CLIENT'S best interest.
- **Billing Increments:** All billable service time shall be recorded in actual minutes and rounded to the nearest quarter hour (15 minutes) for invoicing purposes.
- **Travel Rate:** [redacted] per travel day. (Air travel or driving more than five (5) hours)
- **Additional Expenses (paid by CLIENT):**
  - Mileage: [redacted] mile
  - Rental car, tolls, airfare, hotel fees
  - Court appearances and administrative time (hourly rate)
  - Database fees

D. Verbal Updates

Due to the unpredictable nature of investigations, FIREFLY will provide a general status update after every 30 hours of billed time and request authorization to continue.

E. Timeline

FIREFLY will begin the investigation within four (4) weeks of executing this Agreement and will make every effort to deliver the final report within thirty (30) days of completing the investigation.

F. Written Notice of Termination

Either party may terminate this Agreement at any time by providing fifteen (15) days' written notice sent by both email and certified mail. FIREFLY shall submit a final invoice within fifteen (15) days of termination notice, and CLIENT shall remit payment within fifteen (15) days of receipt.

G. Disclaimer

CLIENT acknowledges that fees are not contingent upon the outcome of the investigation. FIREFLY makes no warranties or guarantees regarding results. FIREFLY will not provide illegal or unethical services and reserves the right to decline or terminate any assignment deemed unlawful, unethical, or detrimental.

H. Reports

FIREFLY will generate a written report upon completion of the investigation, provided the CLIENT'S account is current. The report shall include findings of fact, a timeline of events, an assessment of the institutional response by the BIC Church, findings related to institutional betrayal by the BIC Church, findings regarding any third-party investigations, references to supporting documentation, and FIREFLY's conclusions and recommendations.

FIREFLY will meet with CLIENT and designated representatives to discuss findings. Only the final written report will be released; original notes and work products remain the property of FIREFLY. FIREFLY reserves the right to withhold all reports and evidence pending full payment.

The final report will be provided to the CLIENT and distributed to BIC Church leadership. In the interest of transparency and public accountability, the final report will also be published on the FIREFLY website[4].

I. Client Misrepresentation

CLIENT attests that he/she has not misrepresented themselves, their company, organization, or purpose for requesting FIREFLY's services. The CLIENT understands that misrepresentation in this agreement, in FIREFLY's sole opinion, may result in civil and criminal action against the CLIENT and/or his organization and all monies paid to be forfeited. FIREFLY reserves the right to refuse service to the CLIENT for any issue related to security, safety, or behavior that is unlawful, unethical, or immoral. CLIENT further represents that the information provided by FIREFLY shall be used in a lawful manner and that said information will not be used to purposely cause any physical or emotional harm to the subject of the investigation.

J. Confidentiality

All investigative findings furnished to CLIENT are exclusively for CLIENT'S own use. CLIENT agrees to restrict the dissemination of said findings ONLY to third parties who have a legitimate need to know and/or are authorized by law. FIREFLY will keep findings strictly confidential and will not disseminate or release any findings to third parties unless authorized IN WRITING by the CLIENT or court ordered.

K. Governing Law

This is the entire Agreement of both parties, expressed in this document, and no verbal understandings, agreements, or other documents shall alter, modify, or change the terms of this contract. This agreement is binding on and for the benefit of the parties, their heirs, executors, assigns, legal representatives, and successors. As to the context of the terminology in this agreement, singular shall mean plural and vice versa. CLIENT has had the opportunity to read this Agreement in full and the option to have it reviewed by an attorney. Having no unanswered questions, CLIENT authorizes this investigation and agrees to all the terms and conditions listed herein. By signing this Agreement, I, as CLIENT, certify and affirm that the information supplied above is true and accurate to the best of my knowledge. I further represent and affirm that I am authorized to order this investigation and to enter into a financial contract for this assignment. I also understand that knowingly supplying false or misleading information may result in my case being rejected and/or terminated.

L. Compliance with Mandatory Reporting Laws

FIREFLY will fully comply with the mandatory reporting requirements under applicable state statutes. Any suspected sexual abuse, exploitation, or other conduct involving a minor that may constitute criminal activity will be promptly reported to the appropriate local law enforcement agency or the county department of human services or social services, in accordance with applicable state statutes.

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[4] https://fireflyisai.com/

FIREFLY acknowledges its legal and ethical responsibility to report all credible concerns without delay to the proper authorities. In addition, FIREFLY will collaborate with church leadership to ensure that all reporting obligations are fulfilled in a timely and transparent manner, while preserving the integrity of any investigative process and prioritizing the safety and well-being of potential victims.

AGREED BY THE PARTIES HERETO

FIREFLY - Jim Holler

Signature: [redacted] Date: 4/27/26

CLIENT – Greta Roberts

Signature: [redacted] Date: 4/28/26

Print Name: Greta Roberts

A signed copy or facsimile of this Agreement shall be valid as an original.