

Herron/Harris Statement of Understanding

The parties to this litigation hereby agree to the following statement of understanding:

1. Abigail Harris hereby admits and publicly declares under penalty of perjury that Dan Herron never did any of the following:
 - a. Never tried to kiss me.
 - b. Never tried to touch me in a sexual manner with his hands, or groin.
 - c. Never touched my groin, breast, or buttocks with his hands.
 - d. Never rubbed my shoulders or neck.
 - e. Never put his hand on my thigh, hip, buttocks, or small of my back.
 - f. Never touched my hair with his hands.
 - g. Never caressed me.
 - h. Never offered a massage to me.
 - i. Never made a request or suggestion to engage in sexual relations of any kind (including off color or sexual jokes or remarks of any kind).
 - j. Never tried to force himself on me.
 - k. Never made a request for sexual favors of any kind or in any way.
 - l. Never penetrated me with his body or a foreign object.
 - m. Never showed or texted sexually explicit photos or suggestive messages to me.

2. Dan Herron hereby admits and publicly declares under the penalty of perjury that Ms. Harris believes that he did the following:
 - a. Used his body to intimidate Harris.
 - b. Used his body to tower over Harris.

3. Dan Herron hereby admits and publicly declares under the penalty of perjury that he did the following:
 - a. Addressed a myriad of topics in his sermons, some examples of which range from selfish ambition to pride, to humility, to sexuality, to anger, to relationships. And, often made brief eye contact with all or nearly all parishioners while preaching.
 - b. Had a conversation with Harris in the front exterior of his home while waiting for his family to return.
 - c. Wore a pair of Mountain Hardware Mesa II 9-inch inseam casual shorts (Thunderhead Grey, 34" waist) while visiting a small group birthday party along with his family that was attended by Harris.

4. Abigail Harris hereby admits and publicly declares under penalty of perjury that she never verbally nor via written communication informed Dan Herron that any of his actions or statements made her uncomfortable, nor ever accused him to his face of being a sexual harasser or of being sexually abusive.

5. Dan Herron hereby admits and publicly declares under penalty of perjury that abiding by Matthew 18, and reporting concerns regarding the conduct of a minister to the Central Indiana Presbytery is a proper channel to report parishioner concerns.

6. Abigail Harris hereby admits and publicly declares under penalty of perjury that she believes that any statement or action which a woman personally perceives as sexually suggestive, unwanted, or uncomfortable is "sexual harassment" regardless of the intent of the person who was perceived as engaging in such actions, and regardless of any legal definition of that term. On this basis Harris publicly labeled Dan Herron's actions as "sexual harassment", "sexual misconduct" and "sexual abuse" in a complaint to the church and subsequent publications.

7. Dan Herron hereby admits and publicly declares under penalty of perjury that Abigail Harris believed that his statements and actions could be subjectively perceived as sexually suggestive, unwanted, and/or uncomfortable. Dan Herron hereby publicly declares he never had any such intent.


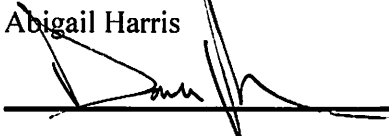
8. Abigail Harris hereby admits and publicly declares under penalty of perjury that she now understands that use of the term "sexual harassment" may be commonly understood to mean conduct such as that listed in Paragraph 1; conduct which did not occur between the parties to this statement.

9. Abigail Harris hereby admits and publicly declares under penalty of perjury her use of the aforementioned terms, because of the connotations those terms have to the general public,

have caused undue harm to Dan Herron and his family, including the loss of employment opportunities. Because of this, Harris has authorized her insurer to pay \$ 8,000 (plus the costs of mediation) to Dan Herron in return for the dismissal of the lawsuit between the parties. Harris sincerely apologizes for any undue harm caused by her actions.

10. Abigail Harris continues to feel that Dan Herron's conduct toward her was not satisfactory and less than she had a right to expect from her minister.
11. Dan Herron apologizes for any impression he gave that led Abigail Harris to believe he was engaging in any sexual conduct of any kind towards her and pledges going forward to be more mindful of how his presence, eye contact, voice tone, and actions might be perceived by women, particularly when he is in a position of authority, such as head minister of a church. He sincerely wishes Abigail Harris had brought her concerns to him directly and contemporaneously so he could have immediately addressed the situation, but he believes he has been better sensitized going forward.

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

 _____	Date: <u>12/14/2023</u>
Abigail Harris	
 _____	Date: <u>12/14/2023</u>
Daniel Herron	