

Herron/Million Statement of Understanding

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

1. Kara Million 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. [See Million Depo. 401; Harris Depo 199]
 - 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 Dr. Million believes he (whether consciously or unconsciously) performed the following actions directed at Dr. Million:
 - a. Used his body to intimidate Million.
 - b. Used his body to corner Million.
 - c. Stared at Million during church proceedings.
 - d. Lurked outside the women's bathroom at church to focus on Million.

- e. Flexed his leg muscles aggressively towards Million.
 - f. Altered his sermon and liturgy content to target Million.
3. Dan Herron hereby admits and publicly declares under the penalty of perjury that he did the following:
 - a. Met and disagreed with Million over the meaning of a sermon illustration.
 - b. Expressed his belief that it is acceptable for men to mentor or counsel women with appropriate consents and mutually agreed-upon boundaries.
 - c. 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.
 - d. 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 also attended by Million.
 - e. Emailed Million to provide pastoral encouragement after hearing news of her student's tragic death.
4. 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.
5. Kara Million hereby admits and publicly declares under penalty of perjury that she believes that "sexual harassment" includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature. Dr. Million asserts that "sexual harassment" does not always have to be specifically about sexual behavior or directed at a specific person. Dr. Million believes that statements or actions which a woman personally perceives as sexually suggestive or uncomfortable are "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, Dr. Million chose to label Dan Herron a "sexual harasser".
6. Kara Million 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.
7. Mr. Herron admits that he was aware, via Dr. Million's non-verbal cues and behavior, that his behavior (regardless of its intent) was making her uncomfortable around him.

8. Dan Herron hereby admits and declares under penalty of perjury that Kara Million believed that his statements and actions could be subjectively perceived as sexually suggestive, unwanted, and/or uncomfortable. Dan Herron hereby declares he never had any such intent.
9. Dr. Million believes that she reported her observations of Mr. Herron's behavior honestly and to the best of her understanding. She believes that she did not lie or knowingly make false claims, and that it was not her intention to defame Mr. Herron.
10. Kara Million hereby admits and publicly declares under penalty of perjury that use of the term "sexual harasser" can also be understood to mean conduct such as that listed in Paragraph 1, conduct which did not occur between the parties to this statement. To the extent third parties inferred from Dr. Million's word choice that the conduct listed in Paragraph 1 occurred, Dr. Million regrets such occurrences.
11. Kara Million 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.
12. Dan Herron regrets any actions that caused Dr. Million to believe he was engaging in any inappropriate 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 people, particularly when he is in a position of authority, such as head minister of a church. He sincerely wishes Kara Million had brought her concerns to him directly and contemporaneously so he could have immediately addressed the situation.

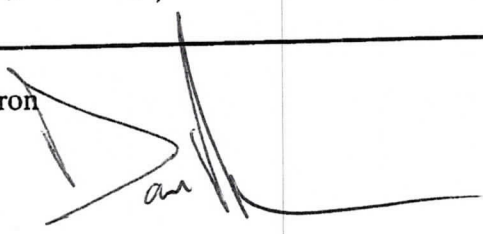
I DECLARE UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Kara Million



Date: 12/14/23

Daniel Herron



Date: 12/14/2023