



The Association of Theological Schools The Commission on Accrediting

INSTRUCTIONS FOR SUBMITTING A FORMAL COMPLAINT

Accreditation by the Commission on Accrediting of The Association of Theological Schools reflects the Commission's judgment that a member school is satisfactorily achieving its mission and educational purposes and that it meets or exceeds the Commission's standards of quality, integrity, and effectiveness. The Commission values information provided by students, employees, and others in determining whether a member school's performance is in conformity with the Commission's [Standards of Accreditation](#) and with the Association's [membership criteria \(PDF\)](#).

FILING A COMPLAINT WITH THE BOARD OF COMMISSIONERS

1. Review the complaint policy of the ATS Commission on Accrediting to discern whether a complaint falls within the scope of Commission policy. See [Commission Policies and Procedures](#), IX, where the Commission-adopted policy appears in green font. (NOTE: "Procedures" hereafter denotes the document subsections printed in black font reflecting protocols adopted by the Board of Commissioners.)
2. Complete all applicable sections of this *Complaint Form*, attaching additional pages as needed. Every exhibit must be listed (i.e., indexed) on the final page of the *Complaint Form*. Incomplete, unsigned, and/or anonymous forms will not be reviewed by the Commission. (NOTE: All forms and documents must be submitted in English, per [Commission Policies and Procedures](#), VII.A.)
3. Submit *Complaint Form* along with any supporting materials or additional documentation to the ATS Commission (address printed below). If submitting the form electronically—which is preferred—the Commission will accept a typed signature. If sending by post instead, a follow-up email is recommended to ensure successful delivery. (NOTE: Please submit single copies of all documentation and, if applicable, consolidate attachments to as few email messages as possible, ensuring all items are labeled clearly.)

OVERVIEW OF THE COMPLAINT REVIEW PROCESS

1. Upon submission, the *Complaint Form* and all related documents will undergo preliminary review to determine whether there is sufficient documentation for the complaint process to proceed vis-à-vis the [Commission Policies and Procedures](#) (IX.A) or any membership criterion of the Association or accreditation standard or adopted policy of the Commission (IX.B). The complainant will receive confirmation of receipt *within 15 business days*, and any additional information required to process the complaint will be identified and communicated *at that time* ([Procedures](#), IX.B.3).
2. After receipt of all necessary information, one of two determinations will be made: either the complaint does not fall under the purview of the Commission's complaint policy and will not be pursued further, or the complaint may or does fall within the purview of the Commission's complaint policy and will be referred to the Board for further review. Once determination can be made in context of the preliminary review, that determination will be communicated *within 15 business days* ([Procedures](#), IX.B.3).
3. If a complaint is referred, the Board within 30 business days will make one of two decisions: either determining that the complaint does not have standing and closing the matter (cf. [Procedures](#), IX.B.2—in which case, such a decision would be communicated *within 15 business days*), or determining that the complaint has standing (cf. [Procedures](#), IX.B.1) and notifying the member school appropriately with response required within 30 business days ([Procedures](#), IX.B.4).
4. If a complaint is determined to have standing, the Board will act in accordance with the procedural protocol for timely, thorough, and fair evaluation of complaints—as outlined in [Procedures](#), IX.B.5-7.
5. All documentation pertaining to the complaint will be kept on file with the Commission.

Please submit questions and/or the completed form (plus any exhibits) to:

accrediting@ats.edu

or

Commission on Accrediting of The Association of Theological Schools
ATTN: Accrediting Office
10 Summit Park Drive
Pittsburgh, PA 15275-1110



COMPLAINT FORM

IDENTITY OF COMPLAINANT

NAME Christine C. Bleecker

ADDRESS 3091 NW 111th Ave. FL

Coral Springs 33065

christinebleecker@gmail.com 310-980-5082

IDENTIFICATION OF OTHER PARTY

ENTITY NAMED IN THIS COMPLAINT: Northern Seminary, specifically its Board of Trustees, including Chair Wyatt Hoch

School directory @ <https://www.ats.edu/member-schools/>
(NOTE: school Member Status must be "Accredited...")

ATS Staff directory @ <https://www.ats.edu/staff>
(NOTE: Commission staff is grouped under "Accreditation")

STATUS OF COMPLAINANT-ENTITY RELATIONSHIP (select all that apply)

<input checked="" type="checkbox"/> Current Student	<input checked="" type="checkbox"/> Enrolled	<input type="checkbox"/> On Leave	
<input type="checkbox"/> Former Student	<input type="checkbox"/> Graduated	<input type="checkbox"/> Withdrawn	
<input type="checkbox"/> Current Faculty	<input type="checkbox"/> Employed	<input type="checkbox"/> On Leave	
<input type="checkbox"/> Former Faculty	<input type="checkbox"/> Retired	<input type="checkbox"/> Resigned	<input type="checkbox"/> Terminated
<input type="checkbox"/> Current Staff/Administration	<input type="checkbox"/> Employed	<input type="checkbox"/> On Leave	
<input type="checkbox"/> Former Staff/Administration	<input type="checkbox"/> Retired	<input type="checkbox"/> Resigned	<input type="checkbox"/> Terminated

Other _____

COMPLAINT DETAILS

1. List ATS [membership criterion](#) and/or area of COA [Standards](#) or [Policies and Procedures](#) relevant to the complaint:

<u>Standard 1. Lack of integrity, care, and focus on students</u>	<u>COA Standards 1.; 1.4</u>
<u>Standard 9. Lack of appropriate and effective governance by Northern's Board of Trustees, enabling and perpetuating abuse of women and minorities, and lack of oversight and accountability of abusive leaders, engaging in abuse itself to</u>	<u>COA Standards 9; 9.2; 9.4</u>



Northern’s students, faculty, staff, and female board members

Standard 7. Lack of services for students to strengthen learning, retention, growth, and safety

COA Standards
7.1; 7.5; 7.6

Standard 10. Lack of safe environment free from harassment and retaliation

COA Standards
10.2

example #1: “Inadequate number of properly qualified professors.”

“ATS Membership Criterion I.C”

example #2: “Insufficient community of learning in the (degree program).”

“COA Standard 7.3”

example #3: “Untimely initial determination of formal complaint to the Commission.”

“COA Policies and Procedures, IX.B.3”

Please append any additional area(s) as a separate attachment.

2. State concisely the nature of the complaint. This statement will help to determine if the complaint falls within the scope of the Commission’s complaint policy. NOTE: the Board of Commissioners is not authorized to adjudicate individual grievances of any kind (COA [Policies](#), IX.B).

The Board of Trustees has hired, enabled, protected, and affirmed abusive, bullying, retaliatory, intimidating, manipulative, and illegal behavior against primarily women and minorities by its now-former president Bill Shiell, and continues to remain unmoved by the numerous complaints of nearly two dozen victims and the over 200 faculty, staff, alumni, and student allies. In fact, instead of taking action to repair the harm that has been done, the Board (specifically Chair Wyatt Hoch and John Kujawa) have engaged in abusive, bullying, and illegal behavior of its own against faculty, staff, students, and even its own female board members. Its actions and inactions and lack of respect and care have greatly decreased the health of Northern resulting in numerous resignations of female high-ranking and high-profile staff, faculty, and Board members, and improper and illegal firings of staff, resulting in a wave of withdrawals and leaves of absences of students, putting the very viability of Northern in great jeopardy.

3. Describe the complaint in succinct detail, indicating how the entity’s actions are out of conformity with aforementioned criteria, standards, policies, and/or procedures—including time frame(s) for any events described. NOTE: complaints against an accredited school must be filed within a year after its review processes have been exhausted; although the Board *may* decide to maintain complainant identity in confidence, anonymous complaints would be ineligible for review (COA [Procedures](#), IX.B.1-2).



In violation of Standard 1 (Mission and Integrity) and specifically Standard 1.4 (Integrity), the Board of Trustees of Northern is utterly failing in institutional integrity, transparency, leadership, communication, and trustworthiness, especially in areas related to human interactions, and is unwilling or unable to properly care for and serve Northern's students, faculty, and staff.

In violation of Standard 9 (Governance and Administration), the Board of Trustees of Northern is failing to create a bond of trust among the Board, administrators, faculty, staff, and students.

In violation of Standard 9.2 (Governance Authority and Qualifications), the Board of Trustees of Northern does not possess the qualifications appropriate to its fiduciary responsibilities and to represent the diversity reflected in Northern's mission. The Board of Trustees has not exercised its authority collectively as a group, but has concentrated power in a few members, and specifically Chair Wyatt Hoch has acted improperly as an individual in ordering the firing of whistleblower Jennifer Boysen. It is not fulfilling its responsibilities on behalf of the school as a whole and is not using the school's mission to guide all major decisions.

In violation of Standard 7 (Student Services), the Board of Trustees of Northern has not focused on students nor served them well.

In violation of Standard 7.1 (Student Services Personnel), the Board has not ensured a sufficient number of qualified student services personnel to meet the needs of students, nor has it provided such personnel adequate resources and professional development to accomplish their work effectively, participate in institutional decisions affecting student services, and advocated for the particular needs of students in their context.

In violation of Standards 7.5 and 7.6 (Student Support Services), the Board has not ensured an environment in which student learning and formation is fostered, retention is strengthened, and student safety is addressed.

In violation of Standard 10.2 (Human Resources), the Board has not ensured a safe, fair, and productive environment, especially regarding procedural fairness, harassment and abuse, other forms of misconduct, nondiscrimination, grievances, hiring, dismissal, and evaluation.

Relevant timeline of events, with red font denoting resignations or firings - **of which we are presently aware** - of female faculty, staff, and board members directly related to the behavior of William Shiell and/or the Board of Trustees. As these are primarily self-reported, we believe these are an underrepresentation of the true and higher numbers.

- March 2016: The Board of Trustees hires William Shiell in 2016. Despite Shiell's history of abusive behavior at First Baptist Church of Tallahassee, FL, and First Baptist Church of Knoxville, Tennessee, the Board hires him (at best, failing to properly investigate Schill's prior roles and, at worst, knowing about the prior abuse and hiring him anyway).
- **MAY 2016: ANITA LUSTREA, DIRECTOR OF ALUMNI AND CHURCH RELATIONS, RESIGNS DUE TO SHIELL'S ABUSIVE BEHAVIOR.**
- **AUGUST 2016: DR. TASHA BROWN, DIRECTOR OF URBAN RELATIONS, RESIGNS, CITING SHIELL'S RETALIATION AFTER DISAGREEING ON THE**



FUTURE DIRECTION OF THE SCHOOL'S RACIAL RECONCILIATION WORK.

- **JANUARY 2019: DR. JILL SIDLER FLEAGLE, DIRECTOR OF SUPERVISED MINISTRY AND STUDENT FORMATION RESIGNS, CITING SHIELL'S MISTREATMENT.**
- 2020: Covid
- 2021: The Board initiates a 360 Chief Executive Assessment of Bill Shiell. The report noted Shiell's difficulty with embracing Northern's values; cited his needing improvement with having a pastoral/missional mindset, servant leadership, and being teachable. He was assessed to be unsatisfactory in building trusting relationships, balancing diverging and competing points of view, and the ability to accept constructive criticism.
- **MARCH 2021: DR. AVA IVY, CHIEF ADMINISTRATIVE OFFICER, RESIGNS, CITING SHIELL'S BULLYING AND TOXIC ENVIRONMENT.**
- October 2022: Jennifer (Jennie) Boysen, also a student of Northern, hired as Chief Development Officer at Northern Seminary.
- October 2022: Shiell refuses to give Jennie Boysen donor information, causing a concern about transparency about donor funds.
- November 2022: **BOYSEN EMAILS WHISTLEBLOWER COMPLAINT** to Shiell, Board Chair Wyatt Hoch, and Board member Melody Ritter regarding the toxic environment created by Shiell. The complaint cites at least seven current employees and nearly two dozen former employees who are willing to speak about their experiences with Shiell's bullying, harassment, and retaliation.
 - Board Chair Wyatt Hoch attempts to facilitate reconciliation between Boysen and Shiell rather than address Boysen's concerns.
 - **16 ADDITIONAL INDIVIDUALS SUBMIT REPORTS TO THE BOARD AND HR REGARDING SHIELL, INCLUDING DR. AVA IVY, ANITA LUSTREA, AND DR. TASHA BROWN.**
 - Board employs Emphasis HR to handle the reports and directs Nathan Dent, seminary administrator, to serve as a liaison with the firm.
 - After pressure from Boysen, the Board employs investigative attorney Maureen Maffei to conduct a third-party investigation. Maffei received all 17 former and current employee reports and interviewed sources.
- **December 2022: DR. INGRID FARO, VISITING PROFESSOR OF OLD TESTAMENT, WRITES NORTHERN BOARD OF TRUSTEES REGARDING SHIELL'S "BULLYING, INTIMIDATION, RETALIATION, DISHONESTY, AND OTHER MANIPULATIVE BEHAVIOR."**



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- January 2023: Maffei delivers results of third-party investigation to a small group of Board members—NOT the full Board, and to date, the report has not been disclosed publicly or to the Northern Community.
- February 2023: Dr. Ingrid Faro emails the Board of Trustees regarding still undisclosed results of third-party investigation.
 - February 11, 2023: 2018 Masters of New Testament (MANT) cohort emails the Board with deep concerns about reports of Shiell's behavior.
 - February 13, 2023: Board sends Boysen a confidential letter sharing that the investigation into Shiell has concluded and didn't necessitate disciplinary action against Shiell.
 - February 15, 2023: An additional 50 students add their signatures to the 2018 MANT cohort's email to the Board.
 - February 17, 2023: Board initiates confidential HR investigation into Shiell's "leadership," but does not respond to student concerns regarding a victim advocate, inviting others to be interviewed, or placing Shiell on administrative leave.
 - February 19, 2023: Shiell takes a voluntary leave of absence. The Board did not place Shiell on administrative leave.
 - February 21, 2023: DR. LYNN COHICK, PROVOST AND DEAN OF ACADEMIC AFFAIRS (AND SINGULAR REASON SO MANY WOMEN AND THEOLOGY STUDENTS ATTEND NORTHERN), RESIGNS IN PROTEST DUE TO THE BOARD'S COMMITMENT TO RETAIN AND SUPPORT SHIELL AS PRESIDENT.
 - February 22, 2023: Tommy Lee, Executive Director of The Grow Center for Church and Mission, sends letter calling for President Shiell's resignation.
- March 2023: Board names Rev. Dr. John Bowling Acting President of Northern Seminary.
 - March 8, 2023: Student Leadership (with signatories by more than half of the entire Northern student population and a group of alumni) emails Board emphasizing continued concerns, citing lack of response to student requests; lack of communication to the Northern community; lack of care, compassion, and sorrow by the Board to victims; centering of Shiell in Board communications; lack of action by the Board to remove Shiell.
 - March 13, 2023: Shiell resigns, but both Board and Shiell are defiant and do not note any concern for students, instead improperly citing vindication.
 - March 13, 2023: Board affirms Shiell's leadership in email to Northern regarding his resignation. The letter from Board Chair Hoch did not acknowledge any of the substantial allegations against Shiell or the negative effects of his behavior on the



Northern community. The Board did not remove Shiell, but instead re-victimized the community in affirming Shiell.

- March 13, 2023: Student Leadership emails Board expressing continued concern, sorrow and anger at the Board's harmful communication and continued mistreatment of Shiell's victims.
- March 15, 2023: Rev. Dr. Fay Quanstrom, Vice Chair of Board of Trustees, emails the Northern community expressing commitment to the school, students, and victims.
- **MARCH 20, 2023: REV. DR. FAY QUANSTROM RESIGNS IN PROTEST, CITING BULLYING, DISRESPECT AND DISREGARD BY MALE MEMBERS OF THE BOARD TO ITS FEW WOMEN MEMBERS, AND STATING THAT HER EXPERIENCE ECHOES THE EXPERIENCE OF THE LETTERS TO THE BOARD BY STUDENTS.**
- March 20, 2023: Rev. Dr. Fay Quanstrom shares a statement of repentance, sorrow, and commitment to repair in a message to the Northern community.
- March 21, 2023: Tommy Lee, Executive Director of the Grown Center, sends letter to Board, faculty, and staff regarding Dr. Quanstrom's resignation and expressing disappointment in Board Chair Wyatt Hoch.
- **MARCH 22, 2023: OVER 100 STUDENTS AND ALUMNI EMAIL LETTER OF NO-CONFIDENCE TO NORTHERN SEMINARY'S BOARD OF TRUSTEES, AND SEEK RESIGNATION OF BOARD CHAIR WYATT HOCH AND ANY OTHER MEMBERS WHO CANNOT AFFIRM STATEMENT BY DR. FAY QUANSTROM.**
- March 28, 2023: Board emails Northern community about authorizing the acting President to seek a counselor to help students "process anxiety", as a somewhat helpful but mostly incomplete and insufficient answer to student complaints.
- **MARCH 30, 2023: BOARD CHAIR WYATT HOCH INSTRUCTS ACTING PRESIDENT JOHN BOWLING TO FIRE WHISTLEBLOWER BOYSEN IMMEDIATELY, WITH THE (ILLEGAL) ALTERNATIVE TO RESIGN BUT SIGN AN NDA.**



4. Indicate what steps are already taken to resolve the issue(s)—including history of relevant communications, related grievance/appeals processes pursued, and any formal action taken to date. NOTE: copies of all correspondence pertinent to this complaint should be appended to this form as well as indexed on the last page below (COA [Procedures](#), IX.B.3).

As noted above, there have been significant efforts by students, faculty, staff, and female board members to provide care to victims, and to ensure that such abuse will not be tolerated or repeated in the future. The Board (especially a few but powerful members) generally remains defiant and unwilling or unable to give appropriate care, time, and energy to make necessary changes. The result has been a rapid departure of students, faculty, and staff from Northern.

5. Summarize the precise resolution you are seeking. NOTE: the authority of the Board is limited to decisions regarding a school's accredited status (COA [Procedures](#), IX.B.3; cf. COA [Policies](#), III.A and III.C-J).

We are seeking an investigation into the Board of Trustees, its members (specifically its Chair Wyatt Hoch and John Kujawa), its bylaws, policies, and actions/inactions that are continually at odds with care for Northern and its students. We also are seeking an investigation into possible financial negligence by the Board in enabling Shiell to exclusively hold nearly all donor relationships and then firing the very person responsible for attempting to rethread those relationships back to Northern. The Board is also not preventing Shiell from leading a trip to Israel for students in the next month, despite his departure from Northern.

6. Provide any additional information that would be helpful in the review of this complaint.



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We invite ATS to refer to www.northernstudentsforjustice.com for a helpful timeline of actions and inactions by the Board and ex-President Shuell, as well as significant media coverage. The Roys Report, Baptist News Global, and Patheos have covered this story for several months, resulting in much negative press for Northern. While there are numerous articles, we attach the ones detailing the prior abuse by Shuell, as well as those detailing Jennifer Boysen's firing.

7. Index item(s) of substance, relevance, and verifiability that are submitted in conjunction with this complaint.

Exhibit A) - November 2022: statement from Dr. Ava Ivy, Former Chief Administrative Officer (2020-2021)

Exhibit B) - November 1, 2022: email from Jennifer Boysen, then Chief Development Officer, to President William Shuell

Exhibit C) - November 3, 2022: Statement from Anita Lustrea, former Director of Alumni and Church Relations (2015-2016)

Exhibit D) - November 6, 2022: Statement from Dr. Tasha Brown, former Director of Urban Relations and Assistant Dean, Program Director, and Adjunct Faculty (2012-2016)

Exhibit E) - December 5, 2022: Letter from Dr. Ingrid Faro, Visiting Professor of Old Testament and Former Dean of Academic Affairs, to Northern Board of Trustees

Exhibit F) - February 6, 2023: Email from Dr. Ingrid Faro, Visiting Professor of Old Testament and Former Dean of Academic Affairs, to Northern Board of Trustees

Exhibit G) - February 11, 2023: Letter to the Northern Seminary Board of Trustees from 2018 MANT Cohort

Exhibit H) - February 15, 2023: Additional Letter to the Board from Students with 50+ More Signees

Exhibit I) - February 22, 2023: Email from Tommy Lee, Executive Director of the Grow Center for Church and Mission, to the Northern Community Calling for President William Shuell's Resignation

Exhibit J) - March 8, 2023: March Letter from Students to Northern Seminary Board of Trustees

Exhibit K) - March 13, 2023: Board Letter to Northern Community Announcing President William Shuell's Resignation

Exhibit L) - March 13, 2023: President William Shuell Letter of Resignation

Exhibit M) - March 20, 2023: Message from Rev. Dr. Fay Quanstrom, Former Northern Seminary Board of Trustees Vice Chair, to Faculty, Staff, and Students

Exhibit N) - March 20, 2023: Resignation Letter from Rev. Dr. Fay Quanstrom, Former Northern Seminary Board of Trustees Vice Chair



Exhibit O) - March 21, 2023: Email from Tommy Lee, Executive Director of the Grow Center for Church and Mission, to the Board of Trustees, and Northern Faculty and Staff

Exhibit P) - March 22, 2023: Student Letter of No Confidence to Northern Board of Trustees Calling for Resignations

Exhibit Q) - April 1, 2023: One of the First Whistleblowers at Northern Seminary says she has been fired by Trustees (Baptist news Global)

Exhibit R) - April 4, 2023: Northern Seminary Fires Whistleblower, Prompting More Unrest & Possible Student Protest (The Roys Report)

Exhibit S) - March 23, 2023: Former Staff at Knoxville Church See a Familiar Pattern in Northern Seminary’s Complaints about Schiell’s Leadership (Baptist News Global)

POLICY ACKNOWLEDGEMENTS

- x “I have read both the complaint policy of the ATS Commission on Accrediting and the instructional cover page of this *Complaint Form* and have no questions about either item at this time.” ([Policies and Procedures](#), IX)
- x “I accept that the purpose of the Commission’s complaint policy is to address significant nonconformity with the ATS [membership criteria](#) and/or the COA [Standards of Accreditation](#) and/or COA [Policies and Procedures](#) and acknowledge that any related action taken by the Board of Commissioners would be limited to decisions regarding a school’s accredited status with the intent to restore conformity to the aforementioned criteria, standards, policies, and procedures.” ([Policies and Procedures](#), IX; cf. III)
- x “I understand that the Board of Commissioners does not adjudicate individual grievances and that it neither arbitrates nor seeks any form of redress on behalf of a complainant.” ([Procedures](#), IX.B.2)
- x “I hereby certify that all of the information I am providing—including this form and any supporting documentation, which together constitute my formal complaint—is true and complete to the best of my knowledge.” ([Policies and Procedures](#), IX)
- x “I hereby authorize the Commission (through its Officers, Board, and staff) to provide the named entity with details of my complaint, acknowledging that only in exceptional circumstances would my identity be maintained in confidence.” ([Procedures](#), IX.B.4 and IX.B.2; cf. IX.B.5-7)

/s/ Christine Calareso Bleecker*

4/25/23

* affirmed and signed by Karen Smith, Justin Charles, and Sarah Klinger (student leadership)