UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA	)	CAUSE NO. 2:12-CR-131
	)	
v.	)	
	)	
JACK ALLAN SCHAAP	)	

SENTENCING MEMORANDUM OF JACK ALLAN SCHAAP

Comes now Jack Allan Schaap, by counsel Paul G. Stracci and Alison L Benjamin of Thiros & Stracci, and submits his memorandum in aid of sentencing with the attached sentencing letters, all in support of the parties' recommendation that the Court impose upon him a below-guideline sentence of 120 months (the statutory mandatory minimum sentence).

Background

Dr. Schaap has pleaded to violating 18 U.S.C. § 2423(a), for causing a young woman to be transported across state lines with the intent that she engage in sexual activity that in violation of various state criminal laws. A violation of §2423(a) carries a mandatory minimum 10 year term (120 months) of imprisonment up to a lifetime of imprisonment. In Dr. Schaap's case, both parties have agreed that the mandatory minimum sentence of imprisonment (120 months) is a fair and reasonable sentence.

Dr. Schaap has held a position of substantial trust for the majority of his life. For the past eleven years, Dr. Schaap has served as pastor for First Baptist Church. While serving as the pastor of First Baptist Church, Dr. Schaap committed his entire life to the service of his local community as well as to the world at large. He worked to develop

and implement faith-based substance abuse programs; programs for the homeless (including local shelters, counseling, and vocational training services); services for the elderly and infirm; academic programs for local public schools (including tutoring, reading, and mentoring programs); programs to assist pregnant teens in graduating from high school; programs to beautify blighted neighborhoods; provided services to local military personnel and their families; and, supported numerous international ministries and schools. He and his family have donated both their professional and their personal time to each of these community outreach programs. And, over the years, Dr. Schaap has personally raised over $100 million dollars to support such programs. His works have had an extraordinary impact not only locally, but on a national and international level as well.

In addition, Dr. Schaap is 55 years old. He has no prior arrests and no prior convictions (resulting in 0 criminal history points and a criminal history category of I). The sentence recommended by both parties, a sentence of 120 months, is a more than substantial sentence for a first time offender who has otherwise led a law abiding life.

Unfortunately, for a four-week period during the summer of 2012, he acted in a manner contrary to the entire balance of his life by engaging in sexual activity with a young woman[1] with whom he had only recently come to counsel. The government asserts the sexual activity to include the following: On June 20 and June 27, 2012, Dr. Schaap caused the young woman to be transported from Indiana to Illinois where they

[1] The young woman was born on June 27, 1995. She turned 17 years old on June 27, 2012.

engaged in sexual activity prohibited by Illinois law.[2] And, during the week of July 10, 2012, he caused the same young woman to be transported from Indiana to Michigan where they engaged in sexual activity prohibited by Michigan law.[3] Subsequently, during the week of July 15, 2012, while remaining in Indiana, he and the young woman engaged in sexual activity prohibited by Indiana law.[4] Dr. Schaap does not dispute that the sexual activity began on June 20, 2012 (approximately one week before the young woman's 17th birthday) and ended during the week of July 16, 2012 (approximately four weeks later).

It is important to note that up until that four-week period Dr. Schaap had never breached the trust placed in him; and, in that sense, the conduct which currently brings him before this Court is aberrant to the balance of his life. It is also important to note that, at the time he engaged in such conduct, he was simultaneously suffering extreme

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[2] In the State of Illinois, the legal age of sexual consent is 17. 720 ILCS 5/11-1.50. However, Illinois law prohibits a person who holds a position of trust, authority, or supervision from engaging in certain sexual activity with a person who is at least 13 years of age but under 18 years of age. 720 ILCS 5/11-1.20(a)(4); 720 ILCS 5/11-0.1. Such conduct constitutes a class 1 felony, punishable by not less than 4 nor more than 15 years of imprisonment. 720 ILCS 5/11-1.20(b); 730 ILCS 5/5-4.5-30(a).

[3] In the State of Michigan, the legal age of sexual consent is 16. MCLS 750.520d. However, Michigan law prohibits a teacher, substitute teacher, administrator, or a contractual service provider of a school or school district from engaging in certain sexual activity with a student who is at least 16 years of age but less than 18 years of age. MCLS 750.520d(1)(e); MCLS 750.520a(r). Such conduct constitutes a third degree felony, punishable by not more than 15 years of imprisonment. MCLS 750.520d(2).

[4] In the State of Indiana, the legal age of sexual consent is 16. IC 35-42-4-9. However, Indiana law prohibits a child care worker from engaging in certain sexual activity with another who is at least 16 years of age but less than 18 years of age. IC 35-42-4-7; IC 35-42-4-7(d). Such conduct constitutes a class D felony, punishable by not less than 6 months nor more than 3 years of imprisonment. IC 35-50-2-7(a).

stress, exhaustion, depression, burn-out, and several other medical maladies.

As described in the presentence report, as a younger man, Dr. Schaap suffered a three year period of depression. In the months preceding his conduct, Dr. Schaap began to sense that his depression was coming back. Additional stress was brought on by a myriad of factors related to the survival of the church and its schools. For instance, where he had always been able to secure funds to support the church's services, he began to struggle to secure adequate funding. Due to the decline in funds available for the church's budget, he was forced to lay-off dedicated workers, causing him further frustration and depression. The lay-offs also necessitated his assuming additional responsibilities, often causing him to work 100 hour weeks with no breaks in his schedule.

Next, the church's schools began to suffer staffing shortages. In order to maintain the schools, Dr. Schaap assumed additional responsibilities related to the staffing shortages. Likewise, Hyles-Anderson removed an administrator, prompting Dr. Schaap to assume additional responsibilities at the college. Then, just prior to his engaging in his conduct, the person who provided pastoral counseling to the church's school students and their parents resigned, prompting Dr. Schaap to assume additional counseling responsibilities. In addition, as described in the presentence report, Dr. Schaap was also being treated by a local urologist and his primary care physician for complications with his prostrate, including chronic and acute prostatitis, as well as near zero lithium levels in his blood.

Moreover, by admitting his guilt via a pre-indictment plea of guilty, he has

acknowledged his unlawful conduct while also sparing the victim of his offense from any further public scrutiny. He has also shielded the victim of his offense from ever having to testify publically regarding the harm he has caused to both her and her family. In addition, Dr. Schaap has also spared his wife and children, family and friends, and the parishioners of First Baptist Church from the pain and heartache that would be caused by dragging those affected through a protracted legal process. Dr. Schaap has pleaded guilty and accepted responsibility for his actions. He has also asked for prayers for all those affected by his actions.

Personal Characteristics and Background

Jack Allan Schaap was born in Holland, Michigan to Ken and Marlene Schaap. At the age of five, he was led to the Lord by his older sister, Kristi. He began to preach at the age of 17. He attended Pillsbury Baptist Bible College for a year and a half before transferring to Hyles-Anderson College in January 1977. He graduated with a bachelor's degree in pastoral theology in May 1978 and a master's degree in May 1979. He married Cindy Hyles in June 1979;[5] and, they have been married for nearly 34 years.

[5] Mrs. Schaap, the daughter of Dr. and Mrs. Jack Hyles, attended First Baptist Church all of her life. She is a 1980 graduate of Hyles-Anderson College. Mrs. Schaap has been a faculty member at Hyles-Anderson College for 25 years; and, in 1998, she was honored by the college with a doctor of letters degree. Mrs. Schaap was also a Sunday school teacher for 15 years and a church bus worker for 9 years. She sings in the adult choir at First Baptist Church and in a variety of other singing groups. Mrs. Schaap is likewise a prolific author. She has authored 13 books. Her first book, *A Wife's Purpose*, was published in 1992 and continues to be a best-seller. She also authored *The Fundamental Man*, the only authorized biography of her father, Dr. Jack Hyles. Mrs. Schaap became senior editor of the *Christian Womanhood* magazine in 2002. She has also served as the conference director of the annual Christian Womanhood Spectacular, a meeting of as many as 7,000 women, and is an oft-requested speaker.

They have two children, Jaclynn and Ken. Jaclynn, a church pianist, is married to Todd Weber, the junior high youth director for First Baptist Church. Jaclynn and Todd have four children. Ken is married to Candace (Hooker) and teaches at Hyles-Anderson College. Ken and Candace have three children.

After graduating with his master's degree in 1979, Dr. Schaap taught Bible at Hyles-Anderson College for 5 years before becoming an assistant to the president of the college. Even with his additional duties, Dr. Schaap continued to teach several Bible classes every semester. During this time, he also traveled extensively across America and became known as one of America's premier preachers. In 1994, he received an honorary doctorate from Hyles-Anderson; and, in 1996, he became vice-president of the college. Dr. Schaap published his first book, *Dating With a Purpose*, in 1990 and has since become a prolific author. He has written 25 books and he has produced several series of booklets, sermon albums, and numerous devotional booklets.

In February 2001, following the death of his father-in-law, Dr. Jack Hyles,[6] the church's Pulpit Committee unanimously nominated Dr. Schaap as a candidate to become the pastor of the church. The parishioners then, by an overwhelming 96% of the vote, elected Dr. Schaap as their pastor. On March 7, 2001, Dr. Schaap began his

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[6] Dr. Jack Hyles, Dr. Schaap's predecessor, was the fourteenth pastor of First Baptist Church of Hammond, serving as pastor from 1959 until his death in February 2001. First Baptist Church has a long and noble history in our community. Hammond Baptist Church was first organized by Brother Allan Hill in 1887. In 1970, the church opened Hammond Baptist High School. In 1971, the church opened Hammond Baptist Grade School. In 1972, the church opened Hyles-Anderson College. And, in 1975, the church opened Memory Lane Cemetery. In 1994, First Baptist Church became the first church in American history to baptize more than 10,000 people in a single year.

first day as the fifteenth pastor of the church.

When Dr. Hyles first arrived at the church, a number of ministries were already in place; however, he was prompted to reach those no one else was reaching and, under his ministry, the "Old Church Downtown" soon became known as the "Church With a Heart." Upon being called to pastor First Baptist Church, Dr. Schaap continued with this vision and, during Dr. Schaap's tenure, the church saw phenomenal growth, with the average weekly attendance more than doubling. Moreover, as the church expanded its membership, it likewise expanded its services to the Hammond community.

Impact Upon the Community

Under Dr. Schaap, First Baptist Church has either maintained or expanded existing services and, in some instances, created additional community programs including, but not limited to: Sunday school classes, programs to help the poor, programs to help servicemen, programs to help slow learning and learning disabled children, programs to help pre-school aged children, adult literacy programs; as well as built grade schools, high schools, and colleges; and created bus routes, rescue missions, jail ministries, teenage ministries, homeless ministries, inner-city ministries, deaf and blind ministries, multi-lingual ministries, and nursing home ministries. During this expansion, Dr. Schaap also served as a counselor and an educator, counseling approximately 100 church members on a weekly basis and superintending more than 3,000 students in five, separate church-operated schools.

International Ministries. World missions, training, and education have been at the heart of Dr. Schaap's work. During his tenure at the church, Dr. Schaap oversaw the

operations of FBMI (Fundamental Baptist Missions International) which, at the time of his tenure, had 142 missionaries in the field. Dr. & Mrs. Schaap, have rallied support and manpower and have worked to raise over $25 million dollars to start six ministries and international schools in foreign countries. In addition, both he and his wife have traveled to foreign countries and have invested much of their personal money in support of world missions.

In 2003, under the leadership of Dr. Schaap, FBMI sent its first missions team to China to start the Hyles-Anderson College Language School. The school, built in the Jilin Province of China, is currently ranked number one in the province (population 47 million); and, the school has since been expanded to create a division in southern China. The schools currently work with approximately 15,000 churches in China to train pastors and community leaders and, prior to his arrest in this matter, Dr. Schapp had been invited to open a new ministry for Chinese citizens who were actively being persecuted for following their religious faith. To date, the team in China has started 21 churches. Dr. Schaap has since been recognized by the Mayor of Jilin City for his work.

In addition, FBMI currently has missions teams in Thailand and the Phillippines. In 2005, FBMI sent its first missions team to the Philippines, where missionaries, under the direction of Dr. Schaap, first worked to create a ministry. Later, in 2012, a college was opened. In Thailand, missions teams worked to build a school. The school, ranked number one in the province, has since been expanded to multiple sites throughout the country. Dr. Schaap was recognized by the Royal Family of Thailand and the Provincial Leader of Thailand for his work.

Moreover, Dr. Schaap has worked to develop a united effort to implement ministerial assistance to Ghana, West Africa. In 2006, the FBMI sent its first missions team to Ghana where the team worked to create over 30 schools and churches in Ghana (providing free medical care), including ministering to thousands of students and their families, and later opened a college. The missionaries have since been invited by the Superintendent of Education to teach in all schools and are currently training personnel to fulfill this invitation. To date, the missions team in Ghana has started an additional 10 churches. Dr. Schaap has since been recognized by the King of Ghana for his work.

Missions Teams to India (initially implemented a training program to educate pastors, now working with more than six colleges throughout the country) and Peru (launched in June 2012, sharing the same goals as previously launched ministries, to start churches, schools, a college to train pastors, and ministering to the needs of the community) are currently on deputation, and a team going to Turkey is in the process of being assembled.

Reformers Unanimous. In January 2007, under the leadership of Dr. Schaap, the church opened a local chapter of Reformers Unanimous Program, a nationally recognized, faith-based addictions recovery program headquartered in Rockford, Illinois. Not only did Dr. Schaap work tirelessly to raise money to create and sustain the local chapter, but he also personally hired the staff. The local program led by Dr. Schaap also incorporates G.E.D. studies, college courses, vocational training, job placement, aftercare support and counseling, reconciliation in relationship counseling, and provides living quarters for both men and women. The Hammond chapter, which

boasts a 75% recovery rate, has quickly become the largest chapter in the nation and the average weekly attendance of the chapter has grown to over 500, including a Spanish Reformers Unanimous.

> 23 years into our marriage . . . [m]y husband tried crack cocaine out of curiosity. And the influence of that drug took control of him immediately. Over the next 2 years we tried different programs. One sponsored by his workplace. We tried a church program, a psychiatrist, and love. None of these worked. Our son John called his Dad and told him of a six month addiction program at First Baptist Church. The cost for the entire program at that time was $50. . . . [Jack Schaap] chose Reformers Unanimous for this area because of the great need to reach functioning addicts with the transforming power of the Lord Jesus Christ. My husband is a trophy of that decision for over 5 years now. *Letter of Jacinta Collins, Sentencing Ex. 89.*
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> I came to Hammond . . . to enter the "Reformers Unanimous Home" that the church through Jack Schaap's leadership provided for persons with addictions. This program is a minimum 6 month, in house program, which turned my life around completely. I have known Jack Schaap personally for 5 years. His preaching has helped me to understand a lot about my behavior and has been a great tool in the healing of my marriage and [my] relationship with my children . . . [and he] personally . . . help[ed] me to reconcile with my second oldest child. *Letter of Paul Collins, Sentencing Ex. 50.*
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> I have a dear friend who struggled for many years with alcoholism, with little family support. . . . When I met her, she had a lovely two-year-old daughter and admitted to me that she was afraid that she would end up in jail after killing someone while driving drunk. It has been several years now that she has not had a drink of alcohol. She is working a job and providing for her daughter as a productive citizen. This is just one example of people whose lives have been impacted by the Reformer's Unanimous program that Jack Schaap introduced to our church. *Letter of Rena Fish, Sentencing Ex. 28.*

Hammond City Homeless Shelter. Dr. Schaap also became involved with the Hammond City Homeless Shelter, hiring George Ronft to be the director of the shelter. Soon after, a daily food pantry and the daily provision of hot meals, were established. And, over the years since, tens of thousands of meals have been served. Dr. Schaap and his wife have donated their time in offering counseling, professional, and vocational

training services to those residing at the shelter.

The Hammond Initiative. In more recent years, under the pastorage of Dr. Schaap, the church has created and implemented a program referred to as "The Hammond Initiative" in order to provide assistance to communities within the Lake County, Indiana and Chicago area. The Hammond Initiative is dedicated towards improved educational opportunities for local youth, assistance to those who were struggling economically, and beautification of blighted neighborhoods.

> The main focus of my work the last two years was at [Jack Schaap's] direction in an outreach called the Hammond Initiative. The Hammond Initiative was [Jack Schaap's] idea of implementing the scripture "Love thy Neighbor as thyself" and "Bearing on Another's Burdens." We worked to make a significant difference in the Hammond public schools by training Tutors and mentors to work in the schools, [implementing] program[s] designed to Help teen pregnant mothers, helping other mothers with elementary aged children of title one schools. . . . [and] [c]rafting and partnering with local area hospitals in annual wellness fairs hosted by our church. This was an effort to invite the public to a free wellness fair with free screening and exams and support. When the No child left behind mandated testing of 3rd graders for comprehensive reading exams or risk failure Jack Schaap adopted a nationally recognized reading assistance program called Barton and began the process to offer it to parents of struggling youth. We provided free marriage and grief counseling at no cost to those of the community as well as food pantries and substance abuse recovery. The Hammond Initiative also partnered with local agencies such as the North Township trustees office to do intervention for struggling Hammond residen[ts] in job placement, financial counseling, connecting to agencies to provide other assistance with utilities and rent. We also partner with the local schools to provide assistance for parents who find themselves in difficult time[s]. *Letter of Bob Marshall, Sentencing Ex. 15.*

> [Jack Schaap] began the Hammond Initiative Program to reach the residents of Hammond. He encouraged reaching out to as many people as possible in Lake County and the Chicago land area. He led us in starting a Reformers Unanimous Organization to change the lives of those enslaved to addictions. His concern to reach other for the Lord became a global vision to reach the world for Christ. . . . His organizational abilities led us to send mission teams from our church to China, the Philippines, Ghana West Africa, Thailand, and South America were they still serve today. *Letter of Joseph & Jeanne Hackett, Sentencing Ex. 41.*

> Jack Schaap has encouraged those under his leadership to be hones, hard-working, caring citizens. He has led the church members to contribute to the community in many ways, including volunteering in the Hammond school system, holding health fairs, running the Hammond City Rescue Mission and food pantry, starting a faith-based addiction program, ministering in the jails, and promoting local businesses and events on the church radio station, etc. Even the beauty of the area of Hammond, Indiana, where First Baptist Church is located was improved through the leadership of Jack Schaap. He promoted the renovation of buildings and improved lighting and landscaping. *Letter of Rena Fish, Sentencing Ex. 28.*

Mentoring Pregnant Teens. Through the Hammond Initiative, the church works with local public high schools to mentor pregnant teens. In 2011, the program served 13 pregnant teens who attended Hammond High School; and, all 13 students graduated from high school. The program has received recognition by the local press and has since been expanded to include Whiting High School.

Reading and Academic Mentoring Program. The Hammond Initiative has grown to include the implementation of a Reading and Academic Mentoring Program in the Hammond Elementary Schools, provided by the church at no cost to the schools. The program includes bringing the Barton Reading Program, a nationally recognized reading accelerator for students suffering from dyslexia and related reading problems. Mentoring is likewise provided by Hammond Baptist School staff and students.

> Dr. Schaap started an educational program . . .[where] . . . high schoolers went into the public elementary schools and mentored the kids. It was a great experience for my daughter. She remained pen pals with a young girl through the summer and sent her a gift on her birthday. Dr. Schaap also started a tutoring program between the college . . . and [a] local public high school. My daughter is extremely academic and it is a great joy of hers to be able to help struggling students with algebra. Many days she comes home excited telling me of a kid she got to help. I love that my daughter has learned at a young age through Jack Schaap's vision to participate in her community. *Letter of Laurie Dorris, Sentencing Ex. 84.*

Great Lakes Ministry. Dr. Schaap has also led the Great Lakes Ministry, a ministry which serves meals and provides an all day program for Great Lakes Naval Trainees (approximately 300 to 500 trainees) each Thanksgiving and/or Christmas Day. The program includes the provision of recreational sporting opportunities and spiritual programs to trainees, with trainees being provided transportation to First Baptist Church on a weekly basis to participate in the programs.

Blood Drives. In 2001, under the pastorage of Dr. Schaap, the First Baptist Church began to hold annual blood drives as a demonstration of its commitment to the community; and in 2003, the American Red Cross lauded the church as a National Award Winner in the Save-A-Life Tour for "outstanding contribution to help support the nation's blood supply and raise awareness about the need for blood."

Neighborhoods, Inc. During his pastorage, Dr. Schaap has also worked with Keith Speakes of Neighborhoods, Inc., to raise money and rally volunteers to help the organization with various projects, including cleaning up vacant lots, painting curbs, and other works designed to improve local neighborhoods.

> I met Jack Schaap in early 2006 . . . . The upshot of this meeting was a change in course by the FBC administration, le[d] by Jack. Since then, he continuously supported community outreach efforts by FBC volunteers. In the case of Neighborhoods Inc., over the past seven years we have used FBC people to provide thousands of hours of labor to help households consisting of elderly, handicapped and other needful persons in Calumet City, Hammond, East Chicago and Gary. These volunteers have cleaned up miles and miles of alleys, vacant lots, parks, yards, etc. and painted, planted and patched up houses, garages, public property and other sites needing extra attention. Jack Schaap started this movement and continued to support it over the years. *Letter of Keith Speaks, Sentencing Ex. 140.*

Work with Disadvantaged Children. In addition, for the past 21 years, Dr.

Schaap and his family members have each devoted a substantial portion of their time towards working with disadvantaged children, such as children from single-parent homes and orphans. In that regard, Dr. Schaap and his family members donate a combined total of 45 hours per week in working with more than 150 widowed parents from the local area. In their endeavors, they have consistently raised over $75,000 a year, including wages earned while working second jobs, in order to raise sufficient funds to provide food, clothing, schooling, counseling, and toys to such families.

Raising Funds to Support Community Programs. Over the years, Dr. Schaap raised over $75 million for church and faith-based work in northwest Indiana, including money for a new church building, remodeling and improving property in downtown Hammond owned by the church, addiction programs, etc. None of the monies raised by Dr. Schaap came from the church he pastored, instead the monies came from outside sources contacted by Dr. Schaap. Dr. Schaap has further been recognized by the former Governor of Indiana and state and local Right to Life organizations for his work.

Reputation and Aberrant Behavior

All those who know Dr. Schaap, whether family, friend, community member, parishioner, or pastor, believe him to be a good man, a man who acted completely out of his character and contradictory to everything his life had theretofore stood for rather than an evil man who had only just been uncovered by the government.

> I know, that as of late there has been a break down in his character and personality; but having pastored people for over 25 years, and knowing Jack as well as I do, I believe he is a very good man that has caved in to the pressure he carried rather than an evil man that has been discovered. *Letter of Zane Abberger, Sentencing Ex. 78.*

> For fifty plus years [Jack Schaap] gave up his own dreams . . .[and] . . . served and sacrificed to help people recover from their problems and make the world around him a better place. . . . Then for a couple of months the unthinkable happened. Please know, the core of Jack Schaap is NOT what the details of this case describe. The core of Jack Schaap IS sacrificing himself to help the hundreds of thousands of children and adults around the world. *Letter of David Jorgensen, Sentencing. Ex. 26.*

> An investigation by Attorney David Gibbs conducted for our church has revealed no other inappropriate contact with a minor. . . . While our investigation is on going and will remain active for years, at this time this appears to be an isolated incident and not a pattern of abuse. *Letter of Luke Lukenoff, Sentencing Ex. 44.*

Dr. Schapp is likewise known throughout the church and the community at large for his thoughtfulness, kindness, generosity, unwavering support of parishioners, and his willingness to take a hands on role in assisting the community at large.

> [Even as a youth], Jack was very thoughtful of others. One example of this is when his mother and I were purchasing a new suit for him to sing in the college choir. Jack insisted that we buy a suit for another friend instead whose parents couldn't afford one. . . . Jack, having received his pilot's license at the age of sixteen, took an eight year old who was dying of leukemia for an airplane ride; that boy called Jack his buddy. The boy died four months later from his illness. *Letter of Kenneth Schaap, Sentencing Ex. 5.*

> [My father] taught me to love others and to have compassion on those who have little to offer in return. When I was eight years old, he and I started a bus route in East Chicago, Indiana, to bring poor children from hurting homes to a place where they could feel the love of Christ, First Baptist Church of Hammond. . . . Each Sunday, we would get up early, go get a bus, and drive to each stop to bring kids, teens, and adults to church. He fed them breakfast each week and often lunch on the way home, and he loved them. Often he would buy groceries for a single mom who had no income or pay a months' rent for a family who was about to be evicted from their home. He put scores of kids through our private, Christian school while paying their tuition out of his own pocket. He even worked an extra job just to help cover the cost of the school bills he paid so that these kids could be given a chance to rise above what they had been given and live a better life for themselves. *Letter of Jaclynn Weber, Sentencing Ex. 4.*

> Before he became a pastor, to help families, [Jack Schaap] would work a 3rd job to be able to assist, in some way, their needs. It was this time in our lives where my

husband had a construction fall and lost his painting business and Jack gave our family $1000.00. As time passed my husband was able to work under his ministry. He also provided a way for us to have our [handicap] accessible van. *Letter of Tina Rodgers, Sentencing Ex. 103.*

Daily people called Dr. Schaap's office from around the country and around the world to ask for an appointment with him or for his advice or opinion. Generals, colonels, governors, physicians, lawyers, educators, law enforcement officers, and even a judge have all at one time or another been amount those to whom Dr. Schaap has ministered. He has bee referred to as "the pastors' pastor." The counseling demand was so great that it took three people in his office to plan his schedule. We would work for days to fit people and events in around his meetings and preaching. But not matter how busy things were, if someone truly needed Dr. Schaap, he was there for them. He would clear his entire schedule to see a man and woman who were having marital problems, or to see parents who had heart break, or a devastated person who watched their spouse drive away with the children, never to return. *Letter of Jean Sheaffer, Sentencing Ex. 20.*

In March of 2009, we found out [my husband] had liver cancer. Mr. Schaap came to the hospital right away. He flew us to Mayo Clinic two times. He helped us financially to go to Wisconsin for help. . . . When he was very sick, Mr. Schaap had a dedication service for [him]. . . . After Don's passing in November of 2009, Mr. Schaap gave me a job at Hammond Baptist, and he counseled me. I had such a hard time, and he helped me through it. I often tell people he saved my life. *Letter of Mrs. Linda Boyd, Sentencing Ex. 24.*

I have two mentally challenged children, both with Cerebral Palsy, one of them blind, and a wife that had a very severe stroke and is now confined to a wheel chair and can do nothing without help. . . . At the time [Jack Schaap] became our pastor I owned five franchises. My wife's health had begun to fail and my son was once again having problems with his shunt. One of twenty seven operations he has had to have. My business collapsed and I was out of a job with zero income. Jack heard of this and asked me to come see him. I did and he found a job for me . . . . Then my [new] employer downsized, lost another job. Now with no income, no health insurance I wasn't sure what to do or which way to turn. Once again Jack heard of this and asks me to come see him. I did and he gave me a job and made sure my family was cared for. He then later helped me to get back on my feet and now once again have a business of my own. *Letter of Mr. Reed Brock, Sentencing Ex. 95.*

There are many circumstances in which Jack Schaap has proven to be a true friend to our family. I will tell you quickly about one deeply personal incident. Two years ago, I almost lost my husband. He had a life-threatening infection that resulted in half of his left foot needing to be amputated. I found myself all

> alone needing to make decisions for my husband's life to be spared and the first people I thought of to call were Jack and Cindy Schaap. Dr. Schaap did not hesitate to spend as much time on the phone as I needed and did not hesitate to call repeatedly to inquire about my husband's condition. He sent letters of encouragement, left voice mails, and was especially concerned for our three children. *Letter of Amy Vassak, Sentencing Ex. 88.*

WHEREFORE, for the foregoing reasons, Dr. Schaap respectfully requests the Court to abide by the sentencing recommendation agreed to by the parties and impose upon him a below-guideline sentence upon him (a sentence that is equal to the statutory mandatory minimum sentence of 120 months).

Respectfully submitted,

/s/ Paul G. Stracci
Paul G. Stracci, ##20388-98
THIROS & STRACCI, P.C.
200 East 90th Drive
Merrillville, IN 46410
voice: (219) 769-1600
email: pstracci@thiros.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA	)	CAUSE NO. 2:12-CR-131
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JACK ALLAN SCHAAP	)	

CERTIFICATE OF SERVICE

The undersigned, Paul G. Stracci, hereby certifies that on January 3, 2013, a true and complete copy of the attached pleading was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification to all parties of record.

/s/ Paul G. Stracci