STATE OF MICHIGAN
DEPARTMENT OF
LIFELONG EDUCATION, ADVANCEMENT, AND POTENTIAL
LANSING

GRETCHEN WHITMER
GOVERNOR

BEVERLY WALKER-GRIFFEA
DIRECTOR

Nicole McCarthy
Living Water Ministries
7898 West Stony Lake Rd.
New Era, MI 49446

10/23/2025

RE: License #: CR640200671
Investigation #: 2025C0434022
Living Water Ministries

Dear Nicole McCarthy:

Attached is the Special Investigation Report for the above-mentioned facility. Due to the violations identified in the report, a written corrective action plan is required. The corrective action plan is due 15 days from the date of this letter and must include the following:

- How compliance with each rule will be achieved.
- Who is directly responsible for implementing the corrective action for each violation.
- Specific time frames for each violation as to when the correction will be completed or implemented.
- How continuing compliance will be maintained once compliance is achieved.
- Signed and dated corrective action plan.

If you desire technical assistance in addressing these issues, please feel free to contact me. In any event, the corrective action plan is due within 15 days. Failure to submit an acceptable corrective action plan will result in disciplinary action.

Please review the enclosed documentation for accuracy and contact me with any questions. If I am not available and you need to speak to someone immediately, please contact the licensing unit at 833-665-8116.

Sincerely,

James Vanden Heuvel

James Vanden Heuvel, Lead Licensing Consultant
Camp Licensing Unit
105 W. Allegan St. 2nd Floor
Lansing, MI 48909
enclosure

MICHIGAN DEPARTMENT OF
LIFELONG EDUCATION, ADVANCEMENT, AND POTENTIAL
CAMP LICENSING UNIT
SPECIAL INVESTIGATION REPORT

I. IDENTIFYING INFORMATION

License #:	CR640200671
Investigation #:	2025C0434022
Complaint Receipt Date:	8/6/2025
Investigation Initiation Date:	8/7/2025
Report Due Date:	10/7/2025
Licensee Name:	Living Water Ministries
Licensee Address:	7898 W. Stony Lake Rd. New Era, MI 49446
Licensee Telephone #:	231-861-4138
Administrator:	Nicole McCarthy
Name of Camp:	Living Water Ministries
Camp Address:	7898 W. Stony Lake Rd. New Era, MI 49446
Camp Telephone #:	231-861-4138
License Status:	Regular
Effective Date:	7/30/2024
Expiration Date:	7/29/2026
Capacity:	120
Camp License Type:	Children’s Residential Camp

II. ALLEGATION(S)

	Violation Established?
Camper A sexually assaulted Camper B while walking to the bathroom by grabbing and kissing. Camper A also vaped marijuana while in the cabin.	No
Additional Findings	Yes

III. METHODOLOGY

8/6/2025	Special Investigation Intake #206757
8/6/2025	Contact-Document Received-Intake #206758
8/7/2025	Contact-Document Received-Intake #206799
8/7/2025	Special Investigation Initiated-Onsite
10/15/2025	Contact-Document Sent- FOIA police report
10/16/2025	Inspection Completed- Sub-Compliance
10/16/2025	Corrective Action Plan Requested and Due By: 11/07/2025
10/23/2025	Exit Conference by telephone with Nicole McCarthy and Jesse Barr.

IV. INVESTIGATION AND FINDINGS

ALLEGATION:

Camper A sexually assaulted Camper B while walking to the bathroom by grabbing and kissing. Camper A also vaped marijuana while in the cabin.

INVESTIGATION:

On 8/6/2025, the department received an online complaint submitted alleging Camper B was sexually assaulted by another youth in their cabin. Camper B was groped walking to the bathroom, being forced kissed multiple times in the bathroom, and Camper A climbed into Camper B's bed and took Camper B's hand and shoved it down Camper A's pants. The unknown camper then cuddled with other campers and smoked weed using a vape with younger campers.

The department received intake #206758 generated from Michigan Department of Health and Human Services (MDHHS) Centralized Intake log #159973532

transferred to law enforcement and the camp licensing unit. The substance of the complaint included similar allegation to the previous intake with the additional information that staff were not aware any of this occurred and were made aware around “10:00am on 8/4/2025” and staff contacted law enforcement.

I contacted MDHHS Child Protective Services Maltreatment in Care (CPS-MIC) intake coordinator to determine if the case was assigned for investigation. CPS-MIC Intake staff responded via email that CPS-MIC/Placement in Care (PCU) unit staff would be following the case due to this being foster care camper involvement.

I received an email from the CPS-MIC/PCU staff with an attached document outlining timelines of the incident involving Camper A and Camper B as provided by the camp representative to CPS-MIC/PCU. The timeline included the camp administration’s actions upon notification of the incident that occurred during the night on 8/3/2025. The timeline included Camper B reporting to Staff Member 1 (SM1) of the sexual contact from the previous night. SM1 and Camper B reported to camp director, Jesse Barr who then separated Camper A from the camper population. Camp administration contacted Camper B’s guardian and Camper A’s foster care agency. Camp administration contacted Oceana County Central Dispatch and were subsequently advised that Michigan State Police (MSP) will be investigating. Camper A and Camper B were interviewed by MSP onsite at the camp facility. Camper A and Camper B were both picked up by guardians at the facility on 8/4/2025.

I reviewed an incident report submitted by director, Jesse Barr. The incident report titled “Incident Reporting Form (Non-Employee)” included camper information, date of incident, incident description, notification to parent/guardian, and staff name/signature.” In addition, the incident report included the times and actions the camp administration completed in response to the behavioral incident. The timeline and response were the same information provided by the CPS-MIC/PCU.

On 8/7/2025, I interviewed Jesse Barr at the facility. He stated SM1 reported to him on 8/4/2025 that Camper B had stated to SM1 that Camper A had tried to touch and kiss Camper B while traveling to the bath house during preparation for bedtime. Camper B also conveyed to SM1 that Camper A made Camper B kiss Camper A and touch Camper A’s penis during the nighttime in Camper B’s bunk. Mr. Barr conveyed his action steps upon hearing the information about the incident. He contacted Camper B’s guardian, separated Camper A from the camp activities and placed Camper A with staff members for supervision, and contacted law enforcement. Mr. Barr stated the incident occurred on the first night of foster care week and there were two male counselors assigned to the cabin group of six boys.

I interviewed camp counselor, SM1 at the facility. SM1 was over 18 years of age. He advised there were six boys between the ages of 9 and 18 years old in the cabin. SM1 stated they were approached by Camper B on 8/4/2025 after chapel in the morning who told SM1 that Camper A had inappropriate contact and touched on the

way to the bathroom the night before. SM1 asked why it was not reported sooner, Camper B stated they didn't want to report it early because they did not want to scare others. SM1 reported that upon the notice, Camper A was removed from the group and Camper B continued with activities with SM1 until which time Camper B was picked up to go home. SM1 stated the camp uses a "Trudy" system involving a rule of three persons to move at the camp. SM1 said around 11:00pm on 8/3 the cabin was preparing for bedtime and the campers were traveling in groups to the bathhouse to prepare for bedtime. SM1 and SM2 stayed back with a camper in the cabin as the group of five campers (Camper A, Camper B, and three others) went to the bathhouse. After the first group returned, Camper A and Camper B walked along with a third camper to go back to the bath house. SM1 stated this is when the alleged touching occurred between Camper A and Camper B. The campers returned to the cabin and went into their bunks, while SM1 provided supervision in the cabin. SM1 was in cabin throughout the night-time. He noticed some campers talking but Camper B appeared sleeping. SM1 woke up in the morning and saw three campers (Camper A and two other campers) laying on the mattresses on the floor sleeping. SM1 had no knowledge of any vaping, campers in each other's bunk beds, or concerns with touching.

I interviewed camp counselor, Staff Member 2 (SM2) at the facility. SM2's role is to assist with maintenance/chores around the camp and to provide additional staff support in the cabin during sleeping time. SM2 provided a recollection of the events of 8/3/2025. Around 10:30-11:00pm, a group of campers went to the bathroom to make final preparations for bedtime. There were five male campers (including Camper A and Camper B) in the group that went to the bathhouse. The policy is if campers were to be showering, then a counselor would accompany but not if it's just for bathroom use. Upon the campers returning, SM1 did not notice any difference in behavior or no noticeable conflicts. With SM1 in the cabin, SM2 left the cabin around 11:40pm to go shower. Upon returning around 12:10am, SM2 noticed three mattresses on the floor, with Camper A and two other campers were talking and had flashlights on. SM2 stayed up monitoring the conversations until they went to their own bunk beds around 12:40am. SM2 was woken up around 2:00am with Camper A and two other campers requesting to get water from the bathhouse. The three campers went to get water, returned, and went to bed. SM2 woke up in the morning to find bedding/mattresses on the floor. SM2 was not aware of the vaping or sexual touching that occurred.

Mr. Barr stated that camp Session 8: August 3-August 7, 2025, was specifically for campers who were involved in the foster care system. He stated that due to limited enrollment, there was only one male cabin and two female cabins. The male campers slept in Cabin #1, and the female campers were housed in "red pine". The male bath house is located about 200ft down a trail from Cabin #1 and directly across from the "red pine" cabin. I observed the trail as being a two-track trail with unobstructed line of sight for a portion of the trail but a turn in the trail that prevents seeing completed from Cabin #1 to the bath house. Additional cabins (Cabin 2, 3, and 4 as well as staff cabin) align the trail between the bath house and Cabin #1.

Mr. Barr said cabin #1 was selected for no apparent reason during the foster care week for the boys. Usually, with greater number of campers, the cabin groups are separated by age group but in this particular week, the wide age group of boys and limited number of male campers resulted in all the boys being placed in the same cabin.

I reviewed the document titled “LWM Summer Procedures Manual (5-2023 Revision). The policy manual reads on page. 4 “*Golden Rule: Seasonal staff who are serving as counselors are to always be with their campers and at the activities in which they are participating. All employees’ primary concern is to ensure the physical, spiritual, mental, social and emotional safety and well-being of campers*.” On page 31 within the section titled “Camper Supervision Ratios”, a table includes columns titled “Camper Age”, ‘Number of Primary Staff”, “Number of ACA Campers”, “Secondary Staff Needed for Additional State Ratio & ACA”, and “Number of State Campers”. The policy includes campers between the ages of 9-14 years: 1 adult staff member to 8 campers for ACA and 10 campers for State of Michigan. For campers between the ages of 15-18 years of age: 1 adult to 10 campers for ACA and 14 campers for State of Michigan. The document reads “for the purposed of these ratios the following people qualify as primary staff: all living water ministries staff over the age of 18 who have passed the staff training tests”. The policy reads “No staff member will be alone with only one camper.”

I reviewed the session #8 roster for the male cabin #1. The cabin listed SM1 and SM2 as being the leaders with six campers in the cabin group.

I reviewed Michigan State Police (MSP) investigation report #62-3309-25. The investigation is considered open and pending prosecutor review.

APPLICABLE RULE	
R400.11111	**Number of Staff**
	(1) A camp shall develop and follow a written staffing ratio plan for the camper population served. A camp shall ensure that the ratio is not less than as specified in subrule (2) of this rule.
For Reference	
	(2) A camp shall ensure that the ratio of adult staff members to campers at any one time is as follows: **(b) For campers below the age of 13, during their sleeping hours there shall be 1 adult staff member for**

	every 10 campers or a fraction thereof beyond the first 14. **(c) For campers 13 years of age or older, there shall be 1 adult staff member for every 14 campers or a fraction thereof beyond the first 14.**
ANALYSIS:	Interviews and records reveal the camp has followed a written staffing plan that includes maintaining a ratio of 1 adult to 10 campers aged 9-14 years old and 1 adult to 14 campers aged 15-18 years old. In addition, the interviews of camp administration and staff confirm the supervision plan allow campers to travel in groups of two or three to the bath house.
CONCLUSION:	**VIOLATION NOT ESTABLISHED**

ADDITIONAL FINDINGS

I reviewed the Bureau of Information Tracking System (BITS) database the age terms of the children's camp license number CR640200671. The age terms for children's camp are listed from age 6 to age 18. I reviewed the licensing notification form submitted on 4/4/2025. The program terms listed the camp operation periods for 8/3/2025 through 8/7/2025. The camp promotional website indicated a specialized week for "foster care" was scheduled for week 8 (August 3-7). The website read in part "Foster Care (For children in foster care grades 3-12)".

Mr. Barr provided a document titled "Admission Guidelines for Foster Care Week". This document revealed details about the foster care week session at the camp including: camp dates, age of campers, registration deadline, camper eligibility, CANS scores, DOC score, and other considerations. Mr. Barr stated this form outlines the eligibility for the acceptance of campers at the camp. It reads the "ages of campers: 7 to 18 years old camper must have completed 2nd grade." The registration deadline was noted as "July 4th. The camper eligibility included the paragraph "*When determining which children can be appropriate to attend camp, keep in mind that camp is not specifically staffed for children with extreme behavioral needs-the same staff are present for foster care week that are present throughout the summer at Stony Lake. The staff are prepared to be sensitive to children who have experienced trauma and may have some challenging behaviors. The important thing to keep in mind is to ensure that the children sent to camp will be safe and will not endanger the safety of those around them."* In the other considerations section, it reads "*1. If a child is living in a residential setting: they probably should not go to camp, but the caseworker could make a case for it if they feel the child will do well in a camp setting. Please contact LWM directly to see if coming to camp is appropriate."*

I reviewed the registration form for Camper A. A google search on the address revealed Camper A's address was an Adult Foster Care (AFC) Home. Camper A was involved in a residential placement. The registration form was signed by a person listed as foster care caseworker. The registration form was completed on 7/22/2025. Camper A's age was listed as 18 years old upon registration and in 11th grade. The health information on the registration includes the statement: *"Signature of Parent/Guardian (or camper, if camper is an adult*)". The form included Camper A's name in the signature line with the date 7/22/2025.

Jesse Barr stated the camp has generally aligned their advertised camp programs to school grade levels and not age-groups thereby allowing at times campers who are aged 18 or older because campers are still involved in high school.

APPLICABLE RULE	
MCL 722.118	**Regular license; renewal; duration; contents; reissuance; extended license**
	(1) A regular license is effective for 2 years after the date of issuance unless revoked or refused renewal as provided in section 11 or modified to a provisional as provided in section 7a. Unless the license is an extended license obtained under subsection (4), a license must be renewed biennially on application and approval. A license shall specify in general terms the kind of child care organization the licensee may undertake, and the number, and ages of children that can be received and maintained.
For Reference	
MCL 722.111	**Definitions**
	(hh) "Minor child" means any of the following: **(i) An individual less than 18 years of age.** **(ii) An individual who is a resident in a child caring institution, foster family home, or foster family group home, who is at least 18 but less than 21 years of age, and who meets the requirements of the young adult voluntary foster care act, 2011 PA 225, MCL 400.641 to 400.671.** **(iii) An individual who is a resident in a child caring institution, children's camp, foster family home, or foster family group home; who becomes 18 years of age while residing in a child caring institution, children's camp, foster family home, or foster family group home; and who continues residing in a child caring institution, children's camp, foster family home, or foster family group home to receive care,**

	maintenance, training, and supervision. A minor child under this subparagraph does not include an individual 18 years of age or older who is placed in a child caring institution, foster family home, or foster family group home under an adjudication under section 2(a) of chapter XIIA of the probate code of 1939, 1939 PA 288, MCL 712A.2, or under section 1 of chapter IX of the code of criminal procedure, 1927 PA 175, MCL 769.1. This subparagraph applies only if the number of those residents who become 18 years of age does not exceed the following: **(A) Two, if the total number of residents is 10 or fewer.** **(B) Three, if the total number of residents is not less than 11 and not more than 14.** **(C) Four, if the total number of residents is not less than 15 and not more than 20.** **(D) Five, if the total number of residents is 21 or more.** **(iv) An individual 18 years of age or older who is placed in an unlicensed residence under section 5(4) or a foster family home under section 5(7).**
ANALYSIS:	Interviews and records reveal the camp has a children's camp license that is specific from ages 6 to age 18. A children's camp license does not include adult campers. Exceptions are made when youth age into 18 years of age while residing at a children's camp. Camper A was 18 years of age at registration and was allowed to register for the children's camp.
CONCLUSION:	**VIOLATION ESTABLISHED**

On 10/23/2025, I conducted an exit conference with Nicole McCarthy and Jesse Barr by video teleconferencing. I reviewed the findings of this report. Nicole McCarthy stated she understood the findings of the report and had already made changes addressing the age of campers who can register for camp.

V. RECOMMENDATION

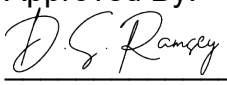
Upon submission of an acceptable corrective action plan, I recommend no change in licensing status.

James Vanden Heuvel 10/23/25

James Vanden Heuvel Date

Lead Licensing Consultant

Approved By:



10/23/2025

Deondra Ramsey, Manager Date
Out-of-School Time Learning and Camp
Licensing