

# WORD OF FAITH, CHARISMATIC, AND RHEMA-ADJACENT MINISTRY AVIATION

## Research Inventory, Accountability Questions, and Oversight Pathways

*United States | Nigeria | South Africa | Cuba travel context*

**Purpose and limit of this document.** This is a research inventory, not an accusation list. It distinguishes documented aircraft-linked entities from charter-use reporting, historical accounts, and leads that require verification. Aircraft registration, title, beneficial ownership, flight purpose, tax treatment, and governance cannot be inferred from a leader's public profile, travel, or ministry size. No entry should be read as an allegation of fraud, misconduct, tax noncompliance, or unlawful activity.

**Prepared by Oklahoma Child Wellbeing**

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## Executive Summary

This brief consolidates names raised during an inquiry into charismatic, Word of Faith, and Rhema-adjacent ministry aviation. It uses four evidence tiers. The goal is to support accurate public-record review rather than broad claims that every named person owns or uses a private aircraft.

| Tier                                     | Meaning                                                                                                                                                         | Publication rule                                                                              |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
| Tier 1 - documented aircraft link        | A named ministry, ministry-related entity, or leader appears in a cited aircraft-tracking or registry-based source with a specific aircraft or aircraft entity. | Describe only the source-supported linkage; re-check registration before using present tense. |
| Tier 2 - charter / aircraft program      | Public reporting describes charter use, aircraft donations, or aviation fundraising but does not establish ownership of a specific aircraft.                    | Do not call the organization an owner without a title or registration record.                 |
| Tier 3 - historical / foreign-media lead | Past reporting or regional reporting identifies an aircraft claim, but current title, status, and entity connection were not independently verified here.       | Label as historical or a verification lead.                                                   |
| Tier 4 - network context only            | The person is relevant to the ministry network but no reliable aircraft record was located in this review.                                                      | Do not imply aircraft ownership, charter use, or financial wrongdoing.                        |

## Core findings

- Rhema and Kenneth Hagin Ministries are relevant because Trinity Foundation's Pastor Planes reporting identified a Canadair Challenger associated with Rhema Bible Church. This should be rechecked in the FAA registry before any current-tense public claim.
- The strongest U.S. Word of Faith entries are Kenneth Copeland, Keith Moore, Creflo Dollar, Jesse Duplantis, Jonathan Shuttlesworth/Revival Today, Jerry Savelle, Leroy Thompson, Bill Winston, Mac Hammond, and related ministry entities, because public aircraft-tracking sources identify specific aircraft or aviation entities.
- For Nigeria, David Oyedepo, Enoch Adeboye, Ayo Oritsejafor, and Johnson Suleman are repeatedly identified in public reporting concerning ministry aircraft, but foreign title and current operating status require country-specific confirmation.
- For South Africa, Ray McCauley and Rhema Bible Church South Africa are central to the Rhema network history, but no reliable aircraft record was located for them in this review. Shepherd Bushiri is a separate, non-Rhema South African aviation-and-litigation research lead requiring precise legal-status language.
- For Cuba, no reliable evidence was located in this review for a Cuban charismatic pastor or ministry owning a private aircraft. The more defensible subject is cross-border ministry travel, visiting speakers, conference hosts, and foreign-support arrangements.

## How to read this brief

An aircraft registry normally identifies a registered owner, not necessarily the beneficial owner, the passenger, the donor who paid for travel, the operator, or the ultimate purpose of every flight. Nonprofit records may show expenses or related organizations, but churches can have differing federal filing obligations. A private flight alone does not establish misuse of charitable assets.

## I. U.S. and Rhema-Adjacent Aviation Inventory

Tier 1 entries below are taken from public Pastor Planes / MinistryWatch reporting or other cited public reporting. The entries are an inventory of source-reported aircraft links - not conclusions about financial propriety, flight purpose, or personal use.

| Leader / organization                                            | Tier   | Source-reported aviation link                                                                                                       | Records still needed                                                                      |
|------------------------------------------------------------------|--------|-------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| Kenneth W. Hagin / Rhema Bible Church / Kenneth Hagin Ministries | Tier 1 | Canadair Challenger reported by Trinity Foundation as linked to Rhema Bible Church.                                                 | FAA registration, ownership entity, current status, flight purpose, board oversight.      |
| Kenneth Copeland / Eagle Mountain International Church           | Tier 1 | Trinity Foundation lists multiple aircraft links, including Citation X and Gulfstream V.                                            | Current registrations; nonprofit/private entity allocation; donor disclosures.            |
| Keith Moore / Faith Life International                           | Tier 1 | Trinity Foundation lists Falcon 900EX and Raytheon 390; later reporting discussed newer aircraft activity.                          | Title chain, current fleet, acquisition method, mission and personal-use policy.          |
| Creflo Dollar / World Changers / World Heir                      | Tier 1 | Trinity Foundation lists Learjet 60 and Gulfstream G-IV under World Heir; earlier G650 fundraising controversy is separate history. | Current ownership, entity relationship, campaign disposition, related-party transactions. |
| Jonathan Shuttlesworth / Revival Today / JFM Air                 | Tier 1 | Trinity Foundation listed a Falcon 50; MinistryWatch later reported JFM Air flight activity.                                        | LLC ownership, operating certificates, flight-log classification, charitable transfers.   |
| Jesse Duplantis / Jesse Duplantis Ministries                     | Tier 1 | Trinity Foundation lists Falcon 900 and Falcon 7X; later reporting referenced sale of an older aircraft.                            | Current registration, sale date, replacement aircraft, operating costs.                   |
| Jerry Savelle / Heritage of Faith Christian Center               | Tier 1 | Trinity Foundation lists a Cessna 560 and Falcon 50.                                                                                | Current title, entity relationship, expenses and flight purpose.                          |
| Leroy Thompson / Word of Life Christian Center                   | Tier 1 | Trinity Foundation lists Falcon 900 association.                                                                                    | Current title and whether aircraft is still held or used.                                 |
| Bill Winston / Living Word Christian Center                      | Tier 1 | Trinity Foundation lists Gulfstream G-IV association.                                                                               | Current registration and governance records.                                              |
| Mac Hammond / Living Word Christian Center                       | Tier 1 | Trinity Foundation lists Falcon 50 association.                                                                                     | Current registration and governance records.                                              |
| Mark Barclay / Living Word International                         | Tier 1 | Trinity Foundation lists Hawker 800XP association.                                                                                  | Current title, operating entity, and use.                                                 |
| I. V. Hilliard / New Light Church                                | Tier 1 | Trinity Foundation lists aircraft under Heritage Aircraft Services / Ira Hilliard.                                                  | Entity ownership, related-party payments, current operation.                              |
| Joyce Meyer Ministries                                           | Tier 1 | Trinity Foundation lists Gulfstream G-IV association.                                                                               | Current registration, corporate structure, and ministry use.                              |
| Joni Lamb / Daystar / Word of God Fellowship                     | Tier 1 | Trinity Foundation lists Gulfstream G-V association.                                                                                | Current registration and broadcaster/nonprofit                                            |

| Leader / organization                       | Tier   | Source-reported aviation link                                       | Records still needed                                   |
|---------------------------------------------|--------|---------------------------------------------------------------------|--------------------------------------------------------|
|                                             |        |                                                                     | allocation.                                            |
| Perry Stone / Voice of Evangelism           | Tier 1 | Trinity Foundation lists Beech F-90 and Raytheon B200 associations. | Title and operating status.                            |
| Mario Murillo Ministries                    | Tier 1 | Trinity Foundation lists Falcon 2000 association.                   | Current title and use.                                 |
| Kevin Zada / Warrior Notes                  | Tier 1 | Trinity Foundation lists three Embraer EMB-505 aircraft.            | Current registrations and LLC relationship.            |
| James Robison / LIFE Outreach International | Tier 1 | Trinity Foundation lists Cessna Citation Excel association.         | Current registration and charity reporting.            |
| TBN / Matthew Crouch                        | Tier 1 | Trinity Foundation lists Bombardier Global Express association.     | Current aircraft record and network/entity allocation. |
| David Cerullo / Imagicomm Enterprises       | Tier 1 | Trinity Foundation lists Canadair Challenger association.           | Current title and corporate relationship.              |

## Tier 2 - charter, donation program, or aviation-use review

| Leader / organization                                                                                                      | Known public context                                                                                                                                                                          | Do not assume                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| Rodney Howard-Browne / Revival Ministries International                                                                    | Trinity Foundation stated the church was not included in its church-owned aircraft list because charter aircraft were reportedly used; the ministry has publicly promoted aviation donations. | That the ministry owns an aircraft, that all travel is donor-funded, or that charter use is improper. |
| Steven Furtick / Elevation Church                                                                                          | Trinity Foundation made a similar charter-use distinction.                                                                                                                                    | Aircraft ownership or a conclusion about individual travel purpose.                                   |
| Benny Hinn; T.D. Jakes                                                                                                     | Frequently discussed in historical media aviation coverage.                                                                                                                                   | A current aircraft title or current operational relationship without updated registry/entity proof.   |
| Andrew Wommack; Paul and Ashley Daugherty; Amanda Grace; Clay and Vanessa Clark; Pam Vinnett; Brenda Todd; Carlton Pearson | Relevant to broad charismatic, Tulsa, political-event, or historical network mapping. No reliable aircraft record was located in this review for inclusion as an owner/operator entry.        | Any aviation link, misuse, or ownership.                                                              |

## II. Nigeria, South Africa, and Cuba

### Nigeria: aircraft claims require local title and entity verification

Nigerian reporting on religious leaders and private aircraft is common, but it often does not distinguish a personal owner, church, trustee, business affiliate, lease, or charter arrangement. The Nigerian Civil Aviation Authority is the aviation regulator. For publication, use country-specific proof and state the date of each record.

| Leader / ministry                                                                                   | Tier                                 | What public sources support                                                                                                                                 | Publication limit                                                                  |
|-----------------------------------------------------------------------------------------------------|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| David Oyedepo / Living Faith Church Worldwide / Winners' Chapel                                     | Tier 1 / strong historical reporting | Trinity Foundation links a Bombardier Challenger to Winners' Chapel through a Delaware trustee. CFR reporting discusses Oyedepo's ministry aircraft claims. | Re-verify current registry/title before asserting present ownership or fleet size. |
| Enoch Adeboye / Redeemed Christian Church of God                                                    | Tier 1 / strong historical reporting | Trinity Foundation links a Gulfstream G550 to RCCG through an aircraft trustee; public Nigerian reporting discussed aviation use.                           | Do not infer personal ownership from church or trustee records.                    |
| Ayo Oritsejafor / Word of Life Bible Church                                                         | Tier 3                               | Public reporting identified a private-jet claim and specific historical aircraft discussion.                                                                | Treat as historical until registry/title is confirmed.                             |
| Johnson Suleman / Omega Fire Ministries                                                             | Tier 3                               | CFR and Sahara Reporters discussed 2019 acquisition claims.                                                                                                 | Do not call current owner without updated official documentation.                  |
| Chris Oyakhilome / LoveWorld / Christ Embassy                                                       | Tier 3 / network lead                | Repeatedly included in older Nigerian reporting about pastor jets; no sufficient current title record was independently confirmed in this brief.            | Use as a lead only, not a verified current aircraft entry.                         |
| Mike Okonkwo; Joshua Iginla; David Ibiyomle; Sam Adeyemi; Paul Enenche; Poju Oyemade; Joshua Selman | Tier 4 / network or media leads      | These names arise in Nigerian charismatic networks or media lists; no adequate current aircraft record was verified here.                                   | Do not imply aircraft ownership or improper finances.                              |

### South Africa and southern Africa

| Leader / ministry                                     | Tier                                      | What is supported                                                                                                                                         | Publication limit                                               |
|-------------------------------------------------------|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| Ray McCauley / Rhema Bible Church South Africa        | Tier 4 / core Rhema network history       | Founder of Rhema Bible Church South Africa and influential in South African interfaith life; no reliable ministry-aircraft record located in this review. | Do not label as a jet owner.                                    |
| Joshua McCauley / current Rhema SA leadership context | Tier 4                                    | Relevant to continuity of the Rhema South Africa network.                                                                                                 | No aircraft claim without specific evidence.                    |
| Shepherd Bushiri / Enlightened Christian Gathering    | Tier 3 / litigation-related aviation lead | Public 2025 reporting described South African court approval to                                                                                           | Use exact legal status. Do not describe allegations as guilt or |

| Leader / ministry                                             | Tier                            | What is supported                                                    | Publication limit                       |
|---------------------------------------------------------------|---------------------------------|----------------------------------------------------------------------|-----------------------------------------|
|                                                               |                                 | sell a Challenger 604 in the context of asset-forfeiture litigation. | final findings.                         |
| Alph Lukau; Paseka<br>Motsoeneng; At Boshoff; Angus<br>Buchan | Tier 4 / regional network leads | No reliable aircraft record was confirmed in this review.            | Do not characterize as aircraft owners. |

### Cuba: travel and foreign-support context, not a jet-owner list

No reliable evidence was located for a Cuban charismatic pastor or ministry owning a private aircraft. The appropriate Cuba section is cross-border ministry travel, conference invitations, visas, commercial/charter carriers, foreign speakers, host churches, remittances or donations where publicly documented, and any travel restrictions applicable at the time. A U.S. or foreign pastor visiting Cuba should not be described as a Cuban aviation owner.

### III. Accountability Questions for Any Ministry Aircraft Review

These questions are appropriate regardless of theology, denomination, nationality, or wealth. They ask for documentation and governance, not speculation about motive.

**Ownership and control:** Who is the registered owner, beneficial owner, operator, lessor, and pilot employer? Is the aircraft held by a church, 501(c)(3), LLC, trust, business entity, or individual?

**Funding:** Was the acquisition paid by cash, loan, lease, donation, trade-in, charter revenues, related-party transfer, or restricted donor funds?

**Related entities:** Does a ministry officer, family member, board member, or contractor own or control any aviation LLC, charter company, management company, hangar, maintenance provider, or brokerage?

**Flight purpose:** Are flights categorized as ministry, donor development, staff, family, personal, commercial, emergency, or mixed use? Who approves the classification?

**Reimbursement and tax treatment:** Are personal or mixed-use flights reimbursed? What policy governs imputed income, expense allocation, and related-party transactions?

**Board independence:** Is there an independent board committee able to approve acquisitions, review high-cost travel, inspect logs, and challenge leaders without retaliation?

**Financial disclosure:** Do annual financial statements, Form 990 filings where required, audited statements, donor reports, or church budgets separately identify aviation spending and related-party payments?

**Safety and compliance:** Are registration, airworthiness, pilot qualifications, maintenance, insurance, and operating certifications current?

**Asset disposition:** When aircraft are sold, donated, transferred, or replaced, is the valuation, recipient, debt payoff, and use of proceeds documented?

**Whistleblower safeguards:** Can staff, pilots, vendors, and members raise concerns confidentially, and is there an independent process for retaliation claims?

#### Evidence protocol before public posting

- Capture a date-stamped FAA or country registry record and keep the exact legal owner name.
- Cross-check the owner against state/provincial/company registrations, nonprofit filings, and the ministry's own disclosures.
- Identify whether the aircraft is owned, leased, chartered, or merely photographed/used once.
- Use precise terms: "registered owner," "reported operator," "ministry-linked entity," or "historical reporting," rather than saying "owns a jet" unless title is established.
- Offer the organization a fair opportunity to provide a correction, current registration, use policy, or documentary explanation before publishing an adverse inference.
- Keep allegations, questions, and verified facts in separate sections.

## IV. Oversight and Verification Organizations

The correct oversight body depends on the issue. Aviation safety, aircraft title, nonprofit governance, charitable fundraising, tax reporting, criminal conduct, and foreign-currency/financial matters are different domains. A report should contain documents, dates, entities, and a clear explanation of the concern.

| Issue                                          | Potential oversight or verification body                                                               | What it can generally address                                                                                                                |
|------------------------------------------------|--------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| U.S. aircraft registration and title records   | Federal Aviation Administration (FAA) Aircraft Registry                                                | Registered ownership, N-number history, and copies of aircraft records. Registration is not proof of beneficial ownership or flight purpose. |
| U.S. aviation safety or operating concerns     | FAA Flight Standards District Office / FAA enforcement pathways                                        | Airworthiness, operating rules, pilot qualifications, and regulatory aviation safety matters.                                                |
| U.S. tax-exempt status and filings             | Internal Revenue Service - Tax Exempt Organization Search (TEOS) / Exempt Organizations                | Tax-exempt status and available Form 990-series information. Churches may have different filing obligations.                                 |
| U.S. charity governance and solicitation       | State attorney general charity bureau, secretary of state, or consumer-protection office               | State charitable solicitation, nonprofit governance, deceptive charitable practices, and registration compliance, depending on state law.    |
| Finding the correct state charity office       | National Association of State Charity Officials (NASCO) resource directory                             | Routes the public to state charity-regulator contacts; NASCO itself is not the enforcement agency for a particular complaint.                |
| Voluntary evangelical financial accountability | Evangelical Council for Financial Accountability (ECFA), when the organization is an accredited member | Voluntary standards and member accountability. It is not a government regulator and has no jurisdiction over nonmembers.                     |
| Nigeria aviation and registration              | Nigerian Civil Aviation Authority (NCAA)                                                               | Aviation safety, aircraft registration, and aviation oversight within its jurisdiction.                                                      |
| Nigeria corporate entity verification          | Corporate Affairs Commission (CAC) and appropriate Nigerian counsel                                    | Company/nonprofit registration, directors, and entity-status review subject to available records.                                            |
| South Africa aircraft and aviation matters     | South African Civil Aviation Authority (SACAA)                                                         | Civil aviation registration and aviation oversight in South Africa.                                                                          |
| South Africa nonprofit/company records         | Companies and Intellectual Property Commission (CIPC), NPO Directorate, and appropriate legal counsel  | Company/NPC/NPO records and governance documentation, subject to record availability.                                                        |
| Cuba travel / foreign operations               | Appropriate aviation, immigration, sanctions, and legal authorities; qualified counsel                 | Travel authorization and cross-border compliance questions are fact-specific and should not be assumed from public travel alone.             |

### When not to report

Do not submit a complaint solely because a ministry owns an aircraft, receives donations, has a wealthy leader, or travels internationally. A credible report needs a specific, supportable concern: for example, a mismatch between a registry record and an organization's disclosure; documented self-dealing; safety evidence; a false charitable



solicitation; or a specific tax/governance issue. When the concern is personal or civil rather than regulatory, consult an attorney or appropriate local advocate.

## V. Disclosures, Source Notes, and Limits

### Publishing disclosures

- Created for public-interest education, research, and accountability discussion. It does not determine legal liability, criminal guilt, tax liability, aviation violations, or wrongdoing by any person or organization.
- Sources may describe historical ownership, an entity relationship, reported use, or a registry entry that later changed. A source-linked aircraft may have been sold, deregistered, re-titled, leased, or operated by a different entity after the cited report.
- An aircraft's registered owner may be an LLC, trustee, holding company, or other entity. Registry information alone does not establish the ultimate beneficial owner, funding source, passenger list, flight purpose, or a nonprofit's accounting treatment.
- Entries marked Tier 3 or Tier 4 are not verified aircraft-ownership findings. Do not copy them into social posts as though they were confirmed facts.
- For fair reporting, request a correction or response from the named organization and attach any complete documentary response to the research file.
- This document intentionally does not estimate net worth, identify private family details, or make accusations based on associations, theological tradition, race, nationality, or political affiliation.

### Principal public sources used for this inventory

Trinity Foundation - Pastor Planes / Jets and Aircraft project: <https://trinityfi.org/category/jets-and-aircraft/>

MinistryWatch - Pastors and Planes reporting: <https://ministrywatch.com/>

Federal Aviation Administration - Aircraft Registry and Aircraft Inquiry: <https://registry.faa.gov/aircraftinquiry>

Federal Aviation Administration - aircraft registration information:  
[https://www.faa.gov/licenses\\_certificates/aircraft\\_certification/aircraft\\_registry](https://www.faa.gov/licenses_certificates/aircraft_certification/aircraft_registry)

Internal Revenue Service - Tax Exempt Organization Search: <https://apps.irs.gov/app/eos/>

Internal Revenue Service - State charity offices: <https://www.irs.gov/charities-non-profits/charitable-organizations/state-charity-offices>

National Association of State Charity Officials: <https://www.nasconet.org/>

Nigerian Civil Aviation Authority - Aircraft Registration: <https://ncaa.gov.ng/services/airworthiness/aircraft-registration/>

South African Civil Aviation Authority: <https://www.caa.co.za/>

Council on Foreign Relations - Preaching, Power, and Private Jets in Nigeria: <https://www.cfr.org/articles/preaching-power-and-private-jets-nigeria>

Sahara Reporters - 2019 Suleman aircraft reporting: <https://saharareporters.com/2019/04/23/apostle-suleiman-acquires-first-private-jet-%E2%80%94-oyedepo-oritsejafor-adeboye>

South Africa 2025 reporting regarding Bushiri aircraft litigation: <https://www.ch-aviation.com/news/152367-south-african-court-approves-sale-of-rogue-pastors-jet>

**Recommended next records to obtain**

- FAA records for every U.S. N-number listed in any source, including registration history and bill-of-sale documents where available.
- State business and charitable-registration records for every U.S. entity that appears in a title chain.
- Form 990 returns, audited financial statements, donor reports, and public annual reports where applicable.
- Corporate/entity documents in Nigeria and South Africa through lawful local channels or qualified local counsel.
- Written aircraft-use, reimbursement, conflict-of-interest, whistleblower, and board-approval policies from the named ministry.
- Flight logs or expense records only through lawful access, voluntary disclosure, official process, or records that are already public.

*End of research brief*

# SUPPLEMENT: LEGAL USES, COMPLIANCE RISKS, SAFEGUARDING, AND REPORTING PATHWAYS

For inclusion with “Word of Faith, Charismatic, and Rhema-Adjacent Ministry Aviation: Research Inventory, Accountability Questions, and Oversight Pathways.”

**Purpose and limits.** This supplement explains why a ministry may lawfully use or charter aircraft, what records support responsible governance, and which legal or safety concerns can require review. It is not an accusation that any leader, ministry, aircraft entity, crew member, passenger, or person named elsewhere in this research has committed a crime, safety violation, tax violation, trafficking offense, or other wrongdoing. A plane, international travel, use of an LLC, or wealth alone does not establish misconduct.

**Important distinction.** Aircraft ownership, flight activity, passenger presence, or a travel destination are not proof of drug activity, commercial sexual exploitation, human trafficking, money laundering, illegal charter, tax misconduct, or any other offense. Serious claims require specific, corroborable evidence and should be reported only through appropriate official channels.

## VI. Legitimate Ministry and Humanitarian Uses

A religious or charitable organization may have a legitimate operational reason to own, lease, manage, or charter an aircraft. The legal analysis depends on its actual purpose, governing documents, tax status, aviation rules, funding, and controls.

| Potential lawful use                              | What good governance should document                                                                                                   |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| Multi-city or international ministry travel       | Written itinerary, event or mission purpose, passengers, cost center, and approval.                                                    |
| Humanitarian or disaster response                 | Relief partner, cargo manifest, destination, safety approvals, chain of custody, and post-trip report.                                 |
| Remote or underserved locations                   | Why commercial routes were impractical, travel alternatives considered, and mission need.                                              |
| Time-sensitive medical, safety, or security needs | Appropriate documentation, risk assessment, and responsible handling of sensitive details.                                             |
| Staff, speakers, equipment, or relief cargo       | Assignment or mission purpose, weight/cargo compliance, insurance, and operational authorization.                                      |
| Properly certificated charter travel              | Operator status, contract, invoice, aircraft authorization, and proof that the charter provider is legally certificated when required. |

A ministry does not have to own an aircraft to travel lawfully. It may use scheduled commercial service, a properly certificated charter, a membership/fractional program, or a leased aircraft. The key question is whether the arrangement complies with aviation rules and whether charitable resources are used for the stated exempt purpose.

## VII. Aviation, Tax, and Governance Compliance

The following categories identify issues that may require documentation or review. They do not establish that any ministry has engaged in improper conduct.

### A. Aviation operations and illegal-charter risk

The FAA distinguishes private operations from operations that carry persons or property for compensation or hire. Air charter operations generally require the higher standards applicable to FAA Part 135 operators. FAA Safe Air Charter materials state that Part 91 operations generally cannot be used for compensation or hire, and the FAA maintains a current list of legal Part 135 holders searchable by operator or aircraft registration.

- **Potential compliance question:** Does the actual operation match the certificate, operating authority, crew qualifications, maintenance program, insurance, and contractual arrangement used?
- **Records to seek:** air operator certificate status, charter agreement, operator name, aircraft N-number, pilot employment relationship, invoices, insurance, and flight logs.

### B. Tax-exempt resources, private benefit, and excess-benefit risk

For organizations that are subject to Internal Revenue Code section 501(c)(3), IRS guidance states that an organization may not be organized or operated for private interests and that its net earnings may not inure to a private shareholder or individual. The IRS also describes “excess benefit transactions,” where an applicable tax-exempt organization provides an economic benefit to a disqualified person that exceeds the value of consideration received.

- **Potential compliance question:** Were personal, family, business, political, or mixed-use portions of aircraft travel identified, valued, approved independently, reimbursed when appropriate, and accurately accounted for?
- **Records to seek:** aircraft-use policy, conflict-of-interest policy, reimbursement records, board minutes, tax treatment, related-party agreements, and audited financial statements where available.

### C. Related-party and self-dealing risk

An aircraft LLC, trustee, management company, broker, hangar provider, maintenance vendor, or pilot-employer can be lawful. The concern is whether a ministry officer, relative, board member, or controlled entity receives undisclosed or above-market benefit from charitable funds or controls both sides of a transaction without independent review.

- **Records to seek:** entity documents, ownership and officer lists, contracts, bid or pricing records, board recusals, conflict disclosures, and transaction approvals.

### D. Cross-border documentation and customs compliance

For U.S. international general-aviation flights, CBP states that APIS manifest transmissions are required for private aircraft arriving in or departing from the United States. This is an operational compliance requirement; the existence of international flight activity alone is not suspicious.

- **Records to seek:** legally obtainable passenger/crew documentation, APIS compliance records where available, customs declarations, mission itinerary, cargo paperwork, and lawful financial-transfer records.

## VIII. Safeguarding, Criminal-Risk Awareness, and Evidence Thresholds

Private aircraft and general aviation can be used lawfully and safely. Like other transportation systems, however, they can also be misused by criminal actors. Federal agencies recognize both illegal-charter concerns and the need for aviation personnel to receive human-trafficking awareness training. This section is a safeguarding framework, not a claim about any person or ministry listed in the aviation inventory.

### A. Drugs, contraband, money movement, and other criminal misuse

Aircraft have been used in criminal narcotics and smuggling cases. That general fact does not permit an inference about a particular aircraft, ministry, leader, traveler, airport, or international route. A concern should be tied to documentary evidence such as an official seizure record, indictment, court filing, credible law-enforcement documentation, verified financial evidence, or corroborated witness evidence.

### B. Human trafficking and commercial sexual exploitation

The DHS Blue Campaign and the Blue Lightning Initiative provide awareness materials for transportation and aviation personnel to help identify and report potential human-trafficking situations. Signs are context-dependent and are not proof. Avoid public accusation based on appearance, nationality, travel, relationships, or an unverified report.

### C. Appropriate safeguarding questions

- Does the organization have written safeguarding, traveler-protection, and reporting policies for minors, vulnerable adults, staff, volunteers, and guests?
- Are passenger manifests, travel permissions, lodging arrangements, and emergency contacts handled lawfully and with privacy protection?
- Are adults traveling with minors subject to appropriate consent, screening, supervision, and child-protection procedures?
- Does the organization maintain confidential reporting channels and prohibit retaliation against pilots, staff, vendors, volunteers, members, or survivors who raise good-faith concerns?
- Are suspicious circumstances reported to appropriate authorities rather than investigated publicly by untrained individuals?

### D. Evidence required before making any criminal claim

- A criminal complaint, indictment, warrant, conviction, plea, official seizure, forfeiture filing, or verified law-enforcement record;
- A sworn affidavit, deposition, or corroborated firsthand account supported by independent evidence;
- Verified flight information matched to objectively documented dates, events, passengers, entities, and lawful records;
- Financial or entity records showing a specific transaction or concealment theory - not mere association or travel;
- A clear separation between verified facts, allegations, unanswered questions, and legal conclusions.

**Publication rule: Do not publish a claim that a named ministry, leader, aircraft, crew member, or passenger was involved in drugs, sex trafficking, commercial sexual exploitation, or another crime unless the claim is supported by strong, attributable, corroborated evidence and reviewed for legal risk. When immediate danger is suspected, preserve evidence, avoid confronting suspected perpetrators, and contact emergency or law-enforcement authorities.**

## IX. Oversight, Reporting, and Responsible Next Steps

Use the agency that matches the issue. Reports should identify the aircraft, registration, entity, date, location, documents, and specific concern. Do not report people solely because they are religious leaders, wealthy, internationally connected, or use private aviation.

| Issue                                                                         | Possible channel                                                                              | What to provide                                                                                               |
|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| Immediate danger, suspected trafficking, exploitation, or criminal conduct    | 911 or local law enforcement; federal reporting pathways as appropriate                       | Location, date/time, aircraft identifier if known, safety facts, witnesses, and preserved evidence.           |
| Human-trafficking awareness or non-emergency report                           | DHS Blue Campaign / National Human Trafficking Hotline; local law enforcement                 | Specific indicators and factual observations; avoid speculation or public naming.                             |
| Suspected aviation-safety or illegal-charter issue                            | FAA Flight Standards District Office / FAA Safe Air Charter resources                         | N-number, operator, flight date, compensation/charter facts, documents, screenshots, and contact information. |
| International passenger-processing or border concern                          | U.S. Customs and Border Protection / appropriate border authority                             | Flight date, route, aircraft identifier, stated concern, and lawfully obtained supporting records.            |
| Nonprofit governance, charitable solicitation, or misuse of charitable assets | State attorney general charity bureau, state consumer protection office, or charity regulator | Entity name, state, transaction records, donor representations, board facts, and supporting documents.        |
| Tax-exempt compliance concern                                                 | IRS Exempt Organizations processes; qualified counsel                                         | Specific transaction, organization status, insider relationship, source documents, and dates.                 |
| Foreign aviation or corporate records                                         | NCAA (Nigeria), SACAA (South Africa), CIPC/CAC or qualified local counsel                     | Exact entity name, aircraft identity, record date, and jurisdiction-specific documentation.                   |

## X. Recommended Ministry Aviation Controls

A responsibly governed organization should be able to produce a current written aircraft-use policy; conflict-of-interest and related-party policies; independent board approval for acquisition and high-cost travel; quarterly or annual reporting separating mission, staff, personal, and mixed-use travel; legal charter/operator verification where relevant; documented reimbursement and tax treatment; maintenance and safety compliance; and confidential, non-retaliatory reporting channels.

**Closing statement. The core accountability question is not whether a religious organization owns or uses a plane. It is whether the organization can demonstrate, flight by flight and transaction by transaction, that its aviation activity is lawful, mission-aligned, safely operated, independently governed, properly documented, and free of undisclosed private benefit.**

## Sources for this supplement

- Federal Aviation Administration, Safe Air Charter: <https://www.faa.gov/charter>
- FAA, Certificated Aircraft Operators / Legal Part 135 Holders: <https://www.faa.gov/about/officeorg/headquartersoffices/avs/faq-certificated-aircraft-operators-legal-part-135-holders>
- FAA, Pilots, Owners, and Operators - Safe Charter Operations: <https://www.faa.gov/about/initiatives/safecharteroperations/pilots-owners-and-operators>
- Internal Revenue Service, Inurement and Private Benefit: <https://www.irs.gov/charities-non-profits/charitable-organizations/inurement-private-benefit-charitable-organizations>
- Internal Revenue Service, Intermediate Sanctions - Excess Benefit Transactions: <https://www.irs.gov/charities-non-profits/charitable-organizations/intermediate-sanctions-excess-benefit-transactions>
- U.S. Customs and Border Protection, General Aviation Processing: <https://www.cbp.gov/travel/general-aviation-processing>
- DHS Blue Campaign: <https://www.dhs.gov/blue-campaign>
- DHS Blue Lightning Initiative: <https://www.dhs.gov/blue-campaign/blue-lightning-initiative>
- DHS Blue Campaign, Identify and Report Human Trafficking: <https://www.dhs.gov/blue-campaign/identify-victim>