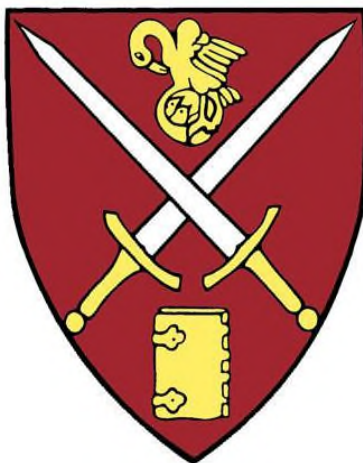


THIS REPORT HAS BEEN CODED TO PROTECT THE IDENTITIES OF ALL VICTIMS AND WITNESSES, AS WELL AS THE IDENTITIES OF CERTAIN FACULTY AND STAFF PER THE DIRECTION AND PURSUANT TO THE CRITERIA IDENTIFIED BY ST. PAUL'S SCHOOL. CASNER & EDWARDS, LLP HAS MADE NO INDEPENDENT DETERMINATION AS TO THOSE WHO REMAIN UNCODED.



SECOND SUPPLEMENT TO FINAL REPORT – CODED FOR
DISTRIBUTION DATED MAY 17, 2017

**INDEPENDENT INVESTIGATION OF
SEXUAL MISCONDUCT AT
ST. PAUL'S SCHOOL**



AUGUST 18, 2018

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I. INTRODUCTION

On November 1, 2017, St. Paul's School (SPS) released a Supplement to the May 17, 2017 Final Report, Coded For Distribution, entitled *Independent Investigation of Sexual Misconduct at St. Paul's School* from Casner & Edwards, LLP.¹ In their cover letter to the members of the SPS community announcing the release of the Supplement and its findings, former Rector Michael G. Hirschfeld² and President of the Board of Trustees Archibald Cox, Jr. stated that "the experiences described in this and the previous reports are profoundly disturbing and shine light on a part of our history that is painful to see and hear. However, this history must be confronted directly in order to heal. The survivors of sexual abuse, and our entire community deserve no less."

Rector Hirschfeld and President Cox also stated that SPS "continues to invite alumni to come forward to share their experiences at the School and will retain Casner & Edwards through at least the end of 2017 as a resource for alumni to contact with concerns regarding sexual misconduct." Once again, in their June 26, 2018 letter "about a number of new resources available for those who experienced sexual abuse by faculty or staff while students at St. Paul's School," Rector Hirschfeld and President Cox identified the School's continued retention of Casner & Edwards as a resource to investigate and record stories of abuse.

As a result, we continue to be available to speak with any alumni/ae who come forward to SPS and/or us with information to share about their experience at the School. Over the course of the past eight months, we have been contacted by a number of SPS alumni/ae and others related to incidents that had not previously been reported to us. As a result, we have reviewed three (3) faculty and staff files, and fifteen (15) alumni/ae files. We conducted interviews by telephone, Skype, or in person, with thirty-five (35) alumni/ae. We also interviewed four (4)

¹ On May 17, 2017, Casner & Edwards produced a Final Report, which was submitted to counsel for SPS. Counsel for SPS then requested that Casner & Edwards produce a Final Report – Coded For Distribution pursuant to criteria identified by SPS. The Final Report – Coded For Distribution was submitted to counsel for SPS on May 20, 2017. On May 22, 2017, SPS released the Final Report – Coded For Distribution dated May 20, 2017 to the members of its community. On September 22, 2017, Casner & Edwards produced a Supplement to the Final Report dated May 17, 2017. Counsel for SPS again requested that Casner & Edwards produce a Supplement to the Final Report – Coded For Distribution pursuant to the same criteria identified by SPS. The Supplement to the Final Report – Coded For Distribution was submitted to counsel for SPS on October 25, 2017. On November 1, 2017, SPS released the Supplement to the Final Report – Coded For Distribution to the members of its community. On August 16, 2018, Casner & Edwards produced a Second Supplement to the Final Report dated May 17, 2017. Counsel for SPS once again requested that Casner & Edwards produce a Second Supplement to the Final Report – Coded For Distribution pursuant to the same criteria identified by SPS.

² Rector Michael G. Hirschfeld, Form of 1985, served as the Thirteenth Rector of SPS from July 2011 to June 2018. He retired from SPS on June 30, 2018. On July 23, 2018, SPS announced that former mathematics faculty member Amy C. Richards would be appointed interim Rector for the 2018 – 2019 academic year. Rector Richards' term began on August 1, 2018 and will conclude on June 30, 2019. On July 30, 2018, SPS announced that Kathleen Carroll Giles will serve as the Fourteenth Rector of SPS beginning on July 1, 2019.

former faculty members, one (1) current faculty member, and one (1) former Advanced Studies Program (ASP) student. In total, we have attempted to or did contact forty-eight (48) individuals. Since November 1, 2017, we have interviewed twenty-one (21) additional victims and twelve (12) additional witnesses.³

This Second Supplement explains our findings as to the alleged conduct of eleven (11) former faculty members, reported to us since November 1, 2017, of which nine (9) were previously known to us, seven (7) having been previously named by SPS, and two (2) are being reported for the first time. As we did in the Final Report of May 17, 2017 and the Supplemental Report of November 1, 2017, we grouped our findings as to the faculty members and staff into three (3) categories, based on the following criteria: (a) the nature and severity of the sexual misconduct involved, including whether the faculty or staff member engaged in activities such as rape, sexual intercourse or sexual assault; (b) the degree of harm and lasting impact to the victim(s) resulting from the sexual misconduct; (c) whether the faculty or staff member engaged in repeated sexual misconduct with one student or a pattern of misconduct with multiple students; (d) whether the alleged misconduct, if committed today, would violate SPS' written policies concerning faculty and staff conduct and expectations; and (e) the availability and reliability of oral or written victim accounts, corroborating witness accounts, admissions by faculty and staff or students, or other documentary evidence to substantiate sexual misconduct. We applied these criteria to the information provided and available to us to date, and then assigned each faculty or staff member to one of the following categories:

A. Substantiated Sexual Misconduct

- Ten (10) former faculty members

B. Other Reports Of Sexual Misconduct

- One (1) former administrator

Of the ten (10) former faculty members listed in category A in this report, seven (7) of them had previously been placed in category A in our prior reports, and their names were subsequently identified by SPS to its community, based on incidents previously investigated. For this reason, under the above criteria, they remain in category A along with three (3) additional faculty members who have been added to category A in this report, two (2) of whom had previously been placed in category B, based on a number of similar incidents of sexual misconduct reported in this and in our prior reports. One (1) former faculty member is being reported on and appearing in category A for the first time. As to the one (1) former administrator in category B, we were unable to substantiate the allegations of sexual misconduct against that

³ Since May 2016, during this independent investigation, we have interviewed one hundred twenty-one (121) alumni/ae, fifteen (15) former faculty and staff members, and four (4) current faculty members. In total, we have attempted to or did contact one hundred ninety-two (192) individuals. We have interviewed sixty-seven (67) victims and fifty-one (51) witnesses.

individual. The allegations of sexual misconduct we investigated in this phase spanned a period of forty-one (41) years, from 1967 to 2008.

As was true with the Final and Supplemental Reports, each person we encountered, from alumni/ae to the current leadership, has impressed us with his or her commitment to uncovering this history and to repairing the impact of the harm done to individuals by a full investigation, and by renewing a commitment to ensure that systems are in place to keep SPS students safe now and in the future.

We again note that our work could not have been completed without the commitment and support of current interim Rector Amy C. Richards, former Rector Michael G. Hirschfeld, Board President Archibald Cox, Jr., and the leadership of SPS. We also appreciate all of the SPS alumni/ae who courageously came forward or responded to our inquiries despite how painful or disturbing it may have been, and respect the wishes of other alumni/ae and those in the SPS community who declined our request for an interview.

A. The Team And Investigative Process

Led by Senior Counsel and former Massachusetts Attorney General Scott Harshbarger, our team included Litigation and Independent Investigations Partner and former Massachusetts Assistant Attorney General Edward V. Colbert III and Litigation and Independent Investigations Associate Carmen F. Francella III. This Team conducted all of the interviews and document/file reviews referenced and/or relied upon during the course of this investigation and in preparation for this report.

We began our investigation by contacting every alumnus/a who had written to SPS with any allegation or information following the release of the Supplemental Report on November 1, 2017. We received additional allegations from alumni/ae relating to sexual misconduct by former faculty and staff in addition to those who contacted SPS. We then contacted those alumni/ae, and any witnesses to any such misconduct.

II. FINDINGS

We assigned ten (10) former faculty members to category A, Substantiated Sexual Misconduct. Seven (7) of those former faculty members appeared in category A in our Final and/or Supplemental Reports, based on previous incidents we investigated. With the additional incidents reported herein, they remain in category A. Two (2) former faculty members previously appeared in category B, but are now appearing in category A due to newly investigated incidents reported by firsthand victims. One (1) faculty member is appearing in category A and in our report for the first time.

We assigned one (1) former administrator to category B, Other Reports Of Sexual Misconduct. We received an allegation of sexual misconduct against the former administrator, but based on our investigation were unable to substantiate it.

Throughout our findings, we incorporate the same definition of the often used phrase “sexual misconduct” contained in our Final Report (*See* Final Report, Section III).

A. Substantiated Sexual Misconduct

We have identified and substantiated ten (10) former faculty and staff members who engaged in sexual misconduct against one or more alumni/ae.

1. Jose A.G. ‘Senor’ Ordonez

Jose A.G. ‘Senor’ Ordonez was a teacher of history at SPS from 1952 to 1987. He was also the School’s cross-country coach, and later its archivist from his retirement in 1987 to 2000. He graduated from Trinity College at the University of Toronto, where he also received his master’s degree in history. Mr. Ordonez was once a visiting teacher at Eton College in England from 1977 to 1978. As a faculty member at SPS, he lived in an apartment in Center Upper. Mr. Ordonez died on February 26, 2008 at the age of eighty-five (85).

Victim Account 1: Student 101

Student 101 contacted Rector Hirschfeld on November 7, 2017 to report sexual misconduct he experienced with Mr. Ordonez. SPS provided the account Student 101 gave to Rector Hirschfeld and his contact information to us. We then contacted Student 101 by telephone to request an interview.

During our interview with Student 101 on November 14, 2017, he told us that he once attended SPS’s Advanced Studies Program (ASP). At the time, Student 101 had just finished his junior year of high school at a public school in New Hampshire, and chose to attend ASP because it was “the most sought after summer program in the state.” Student 101 selected Modern European History, which was taught by Mr. Ordonez, to be his main course of study that summer.

On the first day of class, Mr. Ordonez, who Student 101 described as a “Cuban refugee ... who had a very imposing presence,” announced that he ran four to five miles daily around the SPS campus, and invited anyone of his students to join him. Student 101, who was planning to play football in the fall for his public high school team, decided to join Mr. Ordonez on his runs in order to “stay in shape.” Initially Student 101 and a group of five or six other ASP students joined Mr. Ordonez on his runs. Mr. Ordonez, according to Student 101, “knew the [SPS] campus like the back of his hand,” and would lead the group on runs along Route 89. At the end

of their runs, the group would go “skinny dipping in a pond by the boathouse.” Student 101 recalled everyone, including Mr. Ordonez, removing their shoes, socks, shirts, and shorts before jumping into the pond.

Eventually the group dwindled to three or four, and finally to two. “It was only me and Mr. Ordonez,” said Student 101, who described the runs as “grueling.” The two ran together five days a week, and routinely ended their runs at a gravel pit, where Mr. Ordonez would say, “let’s sprint up the gravel pit.” Once atop the gravel pit, Mr. Ordonez would look at Student 101 and say, “now we’re going to wrestle.” Student 101 recalled being stronger than Mr. Ordonez, which allowed him to win the wrestling match and “prevent [Mr. Ordonez] from doing what he might have done.” He said, “to say that he wanted to wrestle me ... alone in the woods ... it was so ... bizarre.”

Student 101, who has learned to compartmentalize most of these memories over the years, told us that he has a “distinct feeling of Ordonez’s chin being on my back.” He said, “I remember what his chin felt like when he hadn’t shaved for a day or two ... I can feel the stubble from his chin on my shoulder.” Mr. Ordonez was the “worst manipulator of them all,” according to Student 101. In the early 2000’s, Student 101 spoke with a therapist about his experiences with Mr. Ordonez, and continues to do so today. When we asked him if anything beyond wrestling and skinny dipping had occurred, he responded by asking, “do you mean did he penetrate me?” and then said, “I don’t know if I want to go there yet, but I’m sure other things happened.”

Victim Account 2: Student 102

Student 102 contacted us by email on November 13, 2017 to report allegations of sexual misconduct by Mr. Ordonez. During our telephone interview with Student 102 on November 16, 2017, he told us that Mr. Ordonez was a “family friend” and close friend of his father.

It was not until alumni/ae from the Form of 1975 came forward in 2000 to disclose accounts of sexual misconduct by former faculty members that Student 102 “realized who Mr. Ordonez really was.” It was around that time that Student 102 recalled the “two to three mile runs” that he and other students would take with Mr. Ordonez. He remembered a group of male students, including him, running with Mr. Ordonez to “the quarry,” and then arriving there “hot and sweaty ... strip[ping] down naked and jump[ing] in for a dip.” Mr. Ordonez jumped in naked as well, and after the group skinny dipped they would “get out and lay on a big rock naked together and have a cigarette.” As a student, Student 102 never speculated that anything was inappropriate. He said, “we thought nothing about it.” Looking back on it now, however, Student 102 said, “I think how naïve I was.”

Victim Account 3: Student 103

Student 103 contacted us by email on June 26, 2018 to report experiences he had with Mr. Ordonez as a student. During our telephone interview with him on July 2, 2018, he told us he “often ran with Senor.” He said, “he would talk about weird things ... like how some people have souls that are older than their age.” Student 103 told us that at the end of their runs together, Mr. Ordonez would look at him and say, “let’s wrestle.” Student 103 said, “he put his hand around my waist, but I grabbed his arm and wriggled free.”

Mr. Ordonez was also Student 103’s dorm master, and after his graduation from SPS, Mr. Ordonez wrote to Student 103 “once, twice, or three times per month.” It was not until Student 103’s twenty-fifth SPS anniversary that he learned Mr. Ordonez committed similar acts against some of his classmates. He said, “I talked ... and found out others had similar experiences with Ordonez.” Student 103 did not report Mr. Ordonez’s sexual misconduct as a student to any other faculty member or administrator at SPS.

2. Steven David Ball

Steven David Ball was an English teacher at SPS from 1963 to 1999. He graduated from Princeton University and received his master’s degree from Wesleyan University. Mr. Ball is believed to be alive and currently residing in France. We did not attempt to contact Mr. Ball.

Victim Account 1: Student 104

Student 104 contacted us by email on May 3, 2018 to express the concerns of “many alumni that the culture of abuse continues” at SPS. In his email, he wrote that Mr. Ball was his group master when he entered SPS as a fourteen year-old third former. He cited three instances in which Mr. Ball “put his hands on my shoulders or attempted to tickle me in the dorm hall.” Student 104 also recalled attending a “private meeting” in Mr. Ball’s apartment where Mr. Ball “attempted to rub my shoulders from behind me while we were standing alone in his apartment.” Student 104, feeling Mr. Ball’s grasp extend toward his neck area, “swung my right hand and arm clockwise, connecting on the side of his face, not particularly hard but with purpose and intent.” He wrote, “he never touched me again.”

During our telephone interview with Student 104 on May 16, 2018, he reiterated his experiences with Mr. Ball and told us that prior to setting foot on the campus of SPS he had been “warned ... to be careful” around him. Student 104 vividly remembered his experience as a student in Mr. Ball’s apartment, he said, “I remember his apartment ... exactly what it looked like ... all of that time period is clear to me still.” While he said that Mr. Ball never “threatened or coerced” him, he did say, however, that Mr. Ball was “suggestive” when he touched his shoulders, as he recalled Mr. Ball asking, “does this make you happy?” Student 104, who did not have Mr. Ball as a teacher but only as his group master, added, “Ball’s reputation was

widespread among the students ... we all knew to avoid him ... and it is absolutely ludicrous to think that the administration did not know about him.”

Witness Account 1: Student 105

Student 105 contacted our team by telephone on November 10, 2017 to report an incident that occurred during his sixth form year at SPS. During our interview with Student 105 that day, he told us that he was not a victim of sexual misconduct, but knew of another student who was.

As a sixth form student, Student 105 recalled Student 106 disclosing to him that he had participated in “homosexual activities” with Mr. Ball. Student 105 recalled Student 106 indicating that there were “parties” on the squash courts in which Mr. Ball orchestrated “homosexual activities.” Student 105 could not recall specific details concerning the parties, but said recently at his fiftieth SPS anniversary that a classmate of his questioned why the parties were not a part of our reports.

At the time, after learning of Student 106’s allegations, Student 105 reported them to Faculty 46, who, according to Student 105, spoke to then Rector Matthew M. Warren. Rector Warren then asked to meet with Student 105, and Student 105 reported Student 106’s allegations to the Rector. According to Student 105, Rector Warren told him that he had spoken with Student 106, who had allegedly come forward to report homosexual activities at SPS. Rector Warren told Student 105 that he was “well aware” of Student 106’s allegations, and also informed him that Student 106 was withdrawing from SPS.

During our review of Student 106’s student file, we discovered that he struggled socially at SPS and received unsatisfactory grades during his first semester. He only attended SPS for one fall semester, and withdrew that December. From his file, it would seem that he left due to academic difficulties. The file contained no documentation concerning any allegations of sexual misconduct against Mr. Ball, though it is evident that the two knew one another. We were unable to interview Student 106 as he is deceased.

3. Andre Oscar Hurtgen

Andre Oscar Hurtgen was a French and Spanish teacher at SPS from 1960 to 1997. He graduated from Wimbledon College in London and the Universite de Louvain in Belgium, and received his master’s degree from the University of Vermont. Mr. Hurtgen was a house master in Ford House from 1965 to 1969. He is alive and resides in Contoocook, New Hampshire.

Victim Account 1: Student 53

We initially learned of Student 53 during the first phase of our investigation in late 2016. SPS informed us that Student 53 had come forward in the mid-2000’s with allegations of sexual

misconduct against Mr. Hurtgen. Based on her allegations, SPS decided to ban Mr. Hurtgen, who was then retired, from its campus. When we interviewed Mr. Hurtgen on March 6, 2017, in relation to our initial investigation, he admitted to having committed acts of sexual misconduct against Student 53. He told us he “lost control,” and did the “stupidest thing” of his life. Student 53 contacted us by email on November 2, 2017, and said that she had been “sexually molested by Andre Hurtgen” as a student at SPS.

During our telephone interview with Student 53 on November 29, 2017, she told us that after reading SPS alumnus Alex Shoumatoff’s January 2006 *Vanity Fair* article on SPS that she was “fired up” and decided to come forward to SPS about her experiences with Mr. Hurtgen. During her sixth form year, Student 53 had the opportunity to undertake an independent study. At the time, she “admired” Mr. Hurtgen and decided to do an independent study under his faculty supervision, to which he agreed. The night before Student 53 was to leave SPS for Christmas break, Mr. Hurtgen telephoned her house master to request that she meet him at his house on-campus. According to Student 53, Mr. Hurtgen had told her house master that he had a Christmas present to give her.

Student 53 left her dormitory around five or six o’clock, and walked to Mr. Hurtgen’s house. She recalled arriving to a “completely dark” house, and said it was “so dark” that for a moment she wondered if he was even home. Student 53 proceeded to knock on the front door, and Mr. Hurtgen quickly answered. He asked her to come inside, and said that he wanted to show her how he had framed a silk screen she had once made for him. Student 53, who at the time was a friend of Mr. Hurtgen’s daughter, obliged his request and went inside. She told us that she “quickly ascertained that he was home alone ... with all of the lights off I could tell that his wife and daughter were not around.” Mr. Hurtgen led Student 53 down a hallway and into a room where he turned on a light. Student 53 said, “that was the only light on in the house ... the house was pitch black except for when he turned the light on in that one room.”

As they stood next to one another in the doorway of the room, Mr. Hurtgen pointed to the wall and said, “there it is.” Student 53 looked and saw that her silk screen was in fact framed and displayed on Mr. Hurtgen’s wall. Suddenly though, without any warning, Mr. Hurtgen turned and grabbed Student 53 by the shoulders, and pushed her up against the wall and began “French kissing” her. “Completely freaked out,” Student 53 immediately pushed him away. He overpowered her, however, and pushed her right back into the wall and tried to kiss her again. This time she was able to “wiggle away,” and ran as fast as she could out of his house and back to her dormitory. Student 53 did not tell anyone in her dorm what had happened with Mr. Hurtgen, but did tell her mother the following morning when she was picked up for Christmas break.

After Christmas break, Student 53 departed the country for her spring semester independent study program, for which Mr. Hurtgen served as her advisor. As required, she began writing him weekly by letter. She said, “it was totally fine for the first couple of weeks ...

but then I got lonely ... and started to miss home, so I wrote him a letter saying I was unhappy.” Knowing that Student 53 was homesick, Mr. Hurtgen began writing to her daily. She said, “sometimes two or three times a day in fact.” To this day, Student 53 has all of the letters Mr. Hurtgen wrote to her, which are mostly in French and “full of sexual innuendo.” In his letters, Mr. Hurtgen would often reference Student 53’s boyfriend at the time. He would write, “I can do so much more for you.” The letters, which continued throughout her independent study, would also often include a request for Student 53 to destroy or burn them.

When Student 53 returned to SPS after completing her independent study, she decided to confront Mr. Hurtgen. According to her, she met him in his office and said, “I get the impression that you want me ... that you want to have sex with me ... and that’s not going to happen.” Mr. Hurtgen “sanctimoniously” responded, according to her, by saying, “good, because I would have thought less of you if you had done it.” The two then sat together in his office for “two or three hours” talking, and Mr. Hurtgen told Student 53 that he loved her. When she asked him about his wife, he told her that he was “capable of loving two people at once.” She told him, however, that he was going to have to love her “from afar,” because she was “not interested.” She then asked him if he had ever done this with any other female students to which he did not definitively say yes or no, according to her. In Student 53’s mind though, Mr. Hurtgen must have done it before, because he was “too calm about it ... as if it wasn’t his first time.”

4. Gregory ‘Gregor’ DuBuclet

Gregory ‘Gregor’ DuBuclet was a music and German teacher at SPS from 1980 to 1982. He received his bachelor’s degree from the University of New Hampshire in 1979. Mr. DuBuclet, who now goes by Gregor, currently resides in Berlin, Germany where he is a professional musician and composer. We interviewed Mr. DuBuclet by telephone on April 11 and April 19, 2017.

Victim Account 1: Student 107

Student 107 contacted our team by email on March 17, 2018 to report allegations of sexual misconduct against Mr. DuBuclet. During our telephone interview with her on March 26, 2018, she told us that she had read both of our reports, but had not come forward previously because she initially could not remember Mr. DuBuclet’s name.

As a student at SPS, Student 107 spent a lot of time in the music building. Mr. DuBuclet, who was never her teacher, also spent a lot of time there since he taught in the music department. Student 107 said, “we were very non-direct acquaintances.” She told us that when she was a sixteen year-old, fifth form student that she and some of her fellow classmates were “hanging out in the common area” of the music building on a Saturday night. Mr. DuBuclet was also there congregating with the group of students, and, as Student 107 recalled, he asked, “why don’t we all go for pizza?” Student 107 specifically remembered the idea being Mr. DuBuclet’s, as she

recalled the closest restaurant for pizza being two miles away and thus not within walking distance, and also said that neither her nor any of the other students would have had any extra money.

According to her, Mr. DuBuclet drove either a “van or station wagon” at the time, which was big enough to accommodate the group of five or six students. Once the group, of which Student 107 was the only female, arrived at the restaurant, they were seated in a semi-circular booth. She said, “Mr. DuBuclet was seated in the center, and I was seated to his immediate right ... two other students were seated to my right.” While the group chatted and waited for their food, Mr. DuBuclet suddenly put his right hand on Student 107’s left thigh. She immediately went into “flight or fight” mode, and stood up and asked the two students to her right to move so that she could get out of the booth. According to her, Mr. DuBuclet immediately started to apologize.

Student 107 told us that the situation was “awkward” for her, because Mr. DuBuclet was “the host,” had driven her and the other students to the restaurant, and she viewed the outing as “a treat” for the other students. She said, “I didn’t want to spoil the fun.” She therefore decided to go back in the booth and sat down, but, as soon as she did, Mr. DuBuclet put his hand on her thigh again. She told us, “I am most shocked that after apologizing to me, he did the same thing again immediately.” After putting his hand on her thigh for a second time, Student 107 stood up, made the two students to her right move once again, and this time “refused to sit next to him again.” She said, “I never sat next to him again ... the pizza came and we ate it ... and he drove us all back to St. Paul’s.” Student 107 and Mr. DuBuclet never spoke of the incident afterward, nor did she ever go off-campus with him again.

Looking back on the incident now, Student 107 said, “I don’t know what the other students thought ... or why they didn’t say anything ... but I didn’t make any outright protests either.” She added, “I did wonder why the other students weren’t making a fuss about what he had done ... and I think it’s because they were shocked.” In her mind, Mr. DuBuclet’s actions were “calculated.” She contemplated that had she wanted to protest, her only option would have been to walk back to campus. She said, “I would have had to walk back ... in the dark ... on my own ... and there were no lights or sidewalks.” Student 107 thought about reporting Mr. DuBuclet’s actions at the time, but chose not to because she thought she would not be believed. She said, “I thought everyone would give the benefit of the doubt to the teacher.” While she never told anyone about her experience with Mr. DuBuclet as a student, she said, “he quickly earned a reputation for being over-interested in female students.” She could not recall any female students being “afraid of him,” but said, “they knew him to be more handsy ... and would have to be prepared to tell him off.”

Student 107 told us that she does not feel “personally harmed” by her experience with Mr. DuBuclet, but said, “I think students need educating ... I had no idea what I should do or who I should talk to ... young people need training in this.” She referred to SPS as “a great

school ... with great teachers,” and said she was “happy to have gone there.” As to Mr. DuBuclet, however, she said, “he’s the only teacher I can fault in any way,” and added, “the others were highly ethical and committed to students’ welfare.”

5. Allen David Burdoin-Maunes

Allen David Burdoin-Maunes was a math teacher at SPS from 1970 to 1981. Mr. Burdoin graduated from Harvard College. He is alive and currently resides in Chiang Mai, Thailand. He contacted and corresponded with us by email on April 16, 2017, but did not agree to a telephone interview.

Victim Account 1: Student 108

Student 108 contacted our team by email on November 1, 2017 about his experiences as a student with Mr. Burdoin. During our telephone interview with Student 108 on December 6, 2017, he told us that he was “surprised” to see that Mr. Burdoin was not named in category A in our Final Report of May 17, 2017. He said, “then I read your Supplemental Report and was glad to see his name.”

When Student 108 arrived at SPS, he was assigned to live in Brewster House where Mr. Burdoin was his house master. Student 108 said, “I interacted with him based on that relationship.” He recalled Mr. Burdoin owning two vintage Rolls-Royce automobiles at the time. He said, “one was from the twenties or thirties ... it might have been a Silver Ghost ... and the other was from the fifties ... they were both really cool.” On one occasion Mr. Burdoin took Student 108 to the garage near the School’s power plant where he parked the two automobiles, and on another occasion took him for an off-campus drive. Student 108 recalled once taking that off-campus drive with Mr. Burdoin and said, “my Spidey-senses started to tingle during the ride ... it was pretty obvious that he was checking me out.” Student 108 told us that he was “skeeved out,” and did not go on any further car rides after that. He could not recall Mr. Burdoin ever saying anything inappropriate, and made clear that he never touched him, but said that as an adult he now realizes that Mr. Burdoin was “clearly grooming” him. He said, “he was always very friendly to me, especially during the car ride ... thankfully, I didn’t send any signals back.”

Victim Account 2: Student 104

During our telephone interview with Student 104 on May 16, 2018, he told us that on two separate occasions as a student that he went on car rides with Mr. Burdoin in his Rolls Royce. He said, “I went twice ... he drove me around campus ... but I got creeped out and never went again.”

6. Coolidge Mead 'Cal' Chapin

Coolidge Mead 'Cal' Chapin, Form of 1935, was a house master and coach from 1935 to 1937, and served as administrative assistant to Rectors Nash, Kittredge, Warren, and Oates from 1939 to 1980. Mr. Chapin died on January 14, 1992 at the age of seventy-seven (77).

Victim Account 1: Student 109

Student 109 claims to be a victim of sexual misconduct by Mr. Chapin, and is currently involved in a civil lawsuit against SPS. We initially tried to contact Student 109 by email on January 17, 2017, but received no response. On November 30, 2017, Student 109 contacted our team to request an in-person interview. On December 5, 2017, we conducted an interview of Student 109 at our office. Student 109, who was accompanied by his wife, requested the ability to audio record our interview, which we obliged. For a portion of our interview, Student 109 read from a prepared statement. The written statement related to an incident in which Student 109 claims to have traveled to New York City with Mr. Chapin and engaged in sex acts with prostitutes. For purposes of this report, we have requested a copy of the audio recording as well as a copy of the written statement from which he read. To date, Student 109 has provided neither.

Victim Account 2: Student 103

Student 103 contacted us by email on June 26, 2018 to report experiences he had with Mr. Chapin as a student. During our telephone interview with him on July 2, 2018, he told us Mr. Chapin had a "cadre of boys that he took under his wing," and added, "if you were of the most inner circle, he would take you to New York to get prostitutes." Student 103 was not of the "most inner circle," but was invited to Mr. Chapin's faculty apartment in Hargate after athletic practices where he and other students were served tea and toast. He said, "I didn't feel one-hundred percent comfortable there."

Mr. Chapin also invited Student 103 and his roommate to an off-campus dinner one evening, which Student 103 remembered as "mostly uneventful," except that upon returning to campus, Mr. Chapin invited Student 103 and his roommate to his apartment. Once inside, and while Student 103 and his roommate sat waiting in the living room, Mr. Chapin went into his bedroom and returned with a pornographic magazine. Inside the magazine, according to Student 103, Mr. Chapin had pasted over the heads of the pornographic models with heads of SPS faculty members. Student 103 said, "he thought this was tremendously funny." Student 103, however, did not recall laughing and said, "I thought it was a strange thing to show a sixteen year-old." After that incident, Student 103 stopped visiting Mr. Chapin's apartment. He said, "hanging around him made me feel dirty."

While he did not initially intend to report Mr. Chapin's sexual misconduct to us, and only did so after he was encouraged to do so by a friend, Student 103 said, "the Chapin Award ... I'm not going to give money to a school that names an award in honor of a pervert."

Victim Account 3: Student 130

On August 16, 2018, our team received an email from Roderick 'Eric' MacLeish, Esq. requesting that we interview Student 130, his client, related to his experiences with Mr. Chapin as a student at SPS. Due to the fact that we were contacted by an attorney on behalf of a client, we forwarded Attorney MacLeish's email to counsel for SPS. Counsel for SPS requested that we interview Student 130 forthwith to ensure that his account would be included in this report. After receiving confirmation from Attorney MacLeish that Student 130 was available to speak with us, we interviewed him by telephone.

During our telephone interview with Student 130 on August 16, 2018, he told us that he was first encouraged to come forward by Student 109, based upon his involvement as a witness in Student 109's civil lawsuit against SPS. He said, "he told me I should talk to [Attorney MacLeish]," and added, "I think my experience is important for you to hear to show the depths of [Mr. Chapin's] abuse." Student 130 told us in great detail about two trips he took to New York City with Mr. Chapin where he engaged in sexual acts with prostitutes.

Student 130, who first met Mr. Chapin as a third form student, described the acts as "brutal" and "horrific." His relationship as a student with Mr. Chapin developed from initially being invited to Mr. Chapin's apartment in Hargate for "tea and toast" with other male students, to being twice invited to the River Club in New York City. At the River Club, according to Student 130, Mr. Chapin would provide alcohol to the group of male students before escorting them by taxi to a "brothel." He told us that on the two occasions he visited the brothel, or "Lake Louise" as Mr. Chapin referred to it, that he and the other male students were instructed by Mr. Chapin to allow female prostitutes to perform oral sex on them, to then themselves perform oral sex on the prostitutes, and finally to engage in sexual intercourse with the prostitutes. For Student 130, these sexual acts, which were allegedly his first, were "sick" and "awful." He said, "it was so nasty ... here I am, seventeen years-old ... it was disgusting."

While Student 130 remained close to Mr. Chapin after his graduation from SPS, and called him "larger than life," he told us that since meeting with a forensic psychologist in March of this year at the request of Attorney MacLeish that he now realizes Mr. Chapin sexually abused him. When we asked Student 130 why he went for a second time to "Lake Louise," he said, "if [Mr. Chapin] asked you to do something ... you did it," and added, "we were a part of a special group." According to Student 130, he "loved" SPS and had an overall "fabulous experience" as a student, however, visions of his experiences with Mr. Chapin are "seared in my brain" and have caused him to "suffer."

7. William R. 'Bill' Faulkner, Jr.

William R. 'Bill' Faulkner, Jr. was a math teacher at SPS from 1962 to 2009. He received his bachelor's and master's degrees from Harvard University. Mr. Faulkner is alive and currently resides in Concord, New Hampshire. We have not interviewed him.

Victim Account 1: Student 110

Student 110 contacted Rector Hirschfeld by email on November 1, 2017 to disclose experiences she had with Mr. Faulkner as a student. Rector Hirschfeld provided her email to our team and we contacted her to request an interview. During our telephone interview with Student 110 on November 10, 2017, she told us that Mr. Faulkner was her math teacher at SPS. She said, "he was extremely inappropriate ... every single class." She added, "he was creepy ... he would walk around the room ... from student to student ... touching everyone."

Student 110 described Mr. Faulkner's "touching" as massaging students' shoulders, touching their hair, and "running his fingers down your back." She said, "it was constant touching ... he always had his hands lingering on someone." She described this behavior as an "everyday occurrence" and told us that her fellow classmates found Mr. Faulkner to be "really inappropriate ... and disgusting." According to Student 110, because Mr. Faulkner touched both male and female students, she and her fellow classmates did not categorize his behavior as sexual misconduct at the time. She said, "it's just something we dealt with," and added, "he was just a creepy old man ... [we] figured the School knew about it."

Student 110 also recalled once having to go to Mr. Faulkner's on-campus house. She said, "I had to go to his house once because I was not doing well in math." When Student 110 arrived at Mr. Faulkner's front door, she suddenly felt that she should not go inside and ended up standing there for a while before leaving. She said, "I just left ... and went back to my dorm to call my mother to tell her that I did not feel comfortable going to his house." According to Student 110, her mother subsequently contacted SPS, however, "[SPS] denied that Mr. Faulkner did anything wrong." She made clear that she was not present during the telephone call between her mother and SPS, nor did she recall who her mother may have spoken with, but did recall what her mother told her at the time. She said, "my mother told me that she told the School ... that I was uncomfortable going to Mr. Faulkner's house for extra help in math, because Mr. Faulkner had touched me and other students in his class." She added, "my mother told me that the person she spoke to defended Mr. Faulkner and said that he hadn't done anything wrong." Student 110 never personally reported Mr. Faulkner's conduct to any faculty member or administrator at SPS, but said, "believe me when I say that the entire school knew about him ... there is no way the faculty and administration were unaware based on how prevalent the conversations were among the students."

Student 110 expressed concern for what SPS was doing today to prevent teachers like Mr. Faulkner from harming students. As a student, she recalled, “specifically thinking that he had tenure and the School couldn’t do anything about him.” She added, “I also recall conversations among students at the time about rich alumni having control of the School and how they protected Mr. Faulkner from being fired.”

Victim Account 2: Student 111

Student 111 contacted our team by email on November 2, 2017 to report experiences she had with Mr. Faulkner as a student. During our telephone interview with Student 111 on November 17, 2017, she told us that she did not have Mr. Faulkner as a teacher, but did have interactions with him based around math. She said, “boys and girls all knew he was creepy ... and that he wasn’t someone that you wanted to be caught in a room alone with.” Student 111 described Mr. Faulkner as someone who would “always touch you.” She said, “whether it was grabbing your arm or grabbing your forearm ... there was always something ... his hands were always on you when he was talking to you.”

She recalled one specific experience she had with Mr. Faulkner as a student when she was alone in a computer lab in Moore, which she referred to as the “math building” at SPS at the time. While Student 111 was working on math homework in what she described as a “small” computer lab, Mr. Faulkner entered and stood behind her. She recalled Mr. Faulkner asking her how her day was going and about what she was working on, but said she was “really uncomfortable” by his presence. While he stood behind her, the two of them alone in this small room, Mr. Faulkner began massaging Student 111’s shoulders. She said, “I remember his hands coming down from above onto my shoulders,” and added, “he started to massage my shoulders and his hands went a little lower in the front than was comfortable.” She recalled the massage lasting for “around a minute or so” until Mr. Faulkner eventually stopped and left the room. While she did not say anything during the massage, or ask Mr. Faulkner to stop, she did flinch and twitch her shoulders in order to show discomfort, but, according to her, Mr. Faulkner persisted. Though he did not directly touch her anywhere else, Student 111 made clear that Mr. Faulkner’s hands “went a little lower than was comfortable in the front ... like down toward my chest.”

While Student 111 did not report Mr. Faulkner’s conduct to any SPS faculty member or administrator at the time, she did recall telling her roommates about it. She said, “I think I might have said that I just had a creepy encounter with [Mr. Faulkner] or something.”

8. Gerry Eastman Studds

Gerry Eastman Studds was a teacher of history, politics, and government at SPS from 1965 to 1969. He was also an assistant house master in Ford House. He received both his

bachelor's and master's degrees from Yale University. Mr. Studds died on October 14, 2006 at the age of sixty-nine (69).

Victim Account 1: Student 102

On November 13, 2017, Student 102 contacted our team by email to say that he was “sorry to see that Gerry Studds was not mentioned by name” in our reports. He wrote that Mr. Studds had “acted as a predator” when he invited Student 102 to his on-campus apartment. During our telephone interview with Student 102 on November 16, 2017, he described Mr. Studds as an “anti-establishment, anti-war ... wore it on his sleeve ... type of guy.”

Student 102 recalled Mr. Studds' last few months at SPS when Student 102 was in the fourth form. He said, “right before Studds left ... he had a group of fifth and sixth formers who hung around him regularly.” According to Student 102, Mr. Studds knew that he was being fired by SPS at the end of the academic year. He said, “we all thought at the time that it was because of his anti-establishment views ... but then I heard from Faculty 47 several years after I graduated that Studds was actually fired for inappropriate behavior with students.” Looking back on the students who spent time with Mr. Studds the most, Student 102 said, “they were probably all gay,” but added, “we had no idea what gay was ... so that wasn't even a term in our minds at the time.”

While Student 102 did not have Mr. Studds as a teacher, he said that his own “rowdy” and anti-establishment views might have attracted Mr. Studds' attention. He recalled Mr. Studds once inviting him to his on-campus apartment. He said, “I went over and he asked me if I wanted to get stoned.” Student 102 said that he and Mr. Studds did smoke marijuana together, which Student 102 said he “didn't mind,” but then Student 102 “passed out.” He said, “when I woke up, I was lying on his bed and my shirt was unbuttoned or off ... and he was lying next to me rubbing my chest.” Student 102 immediately jumped out of the bed and fled Mr. Studds' apartment as quickly as possible.

He never went to his apartment again, nor did Mr. Studds ever invite him again. And while he did not report Mr. Studds' behavior to any SPS faculty member or administrator, because in his words “that was just something you didn't do back then,” he did share his experience with his roommate and another classmate at the time. Student 102 said, “both of them then told me that similar things had happened to them.” He also remembered Mr. Studds often being around older students, and speculated that “when he knew he was being fired ... I think he went after the younger guys like me and my roommate.”

While Student 102 would not share the name of his roommate with us, he did indicate that he would reach out to him to encourage him to speak with us for corroboration. He said, “the reason I wrote to you ... I came forward to corroborate the secondhand stories you have

heard ... so that Studds can be named.” Student 102 told us that he “did not suffer” from Mr. Studds’ conduct, but that he “want[s] what he did to be known.”

Victim Account 2: Student 112

On November 29, 2017, our team received a telephone call from Student 112 who indicated that he had been in contact with Student 102 and wished to speak with us about his own experiences with Mr. Studds at SPS. During our interview with Student 112, he said, “I simply want to corroborate [Student 102’s] allegations ... and add my own to the record.” As a student, Student 112 did not have Mr. Studds as a teacher, however, he remembered him as being a “political science and politics luminary ... who was very well-respected by the students.”

Student 112’s only contact with Mr. Studds occurred shortly before the end of his fourth form year, he said, “I had no contacts with Studds prior to that ... I virtually never crossed paths with him.” During the spring of Student 112’s fourth form year, Mr. Studds invited him to take an off-campus drive. Student 112 said, “I think it was random ... totally predatory.” Mr. Studds stopped him on campus and said, “hey, let’s go for a ride.” He recalled Mr. Studds telling him where his vehicle was parked and for him to meet Mr. Studds there at a certain time, which he did. He remembered Mr. Studds driving a “big green station wagon” at the time, and said, “so we took this drive off-campus, and along the way he pulled off the road and stopped.” Student 112 could not recall the exact location, but described it as “some kind of promontory with a sunset ... a woodsy, hilly area.” With the vehicle parked, Mr. Studds turned to Student 112 and said, “if it’s okay with you I would like to hold you out of desperation.” Mr. Studds then pulled Student 112 into his chest, and held him in his arms. Student 112 said, “it seemed really odd ... in fact, it was bizarre.” He added, “[it] wasn’t just a master hugging a student type of feel.” He recalled “letting it go for a minute or so,” but then laughing and telling Mr. Studds to take him back to SPS. He said, “[Mr. Studds] turned the car on and drove back to campus.”

Student 112 recalled speaking to Student 102 and another SPS student about Mr. Studds’ conduct the following day, but said that he did not report Mr. Studds to any SPS faculty member or administrator. He said, “there was no one to talk to about this.”

9. Dr. David O. Pook, Ph.D.

Dr. David O. Pook, Ph.D. was a Humanities teacher, crew and basketball coach, faculty adviser for the Pelican, and house master in Kittredge II at SPS from 2000 to 2008. He received his bachelor’s degree from the University of Pennsylvania and his doctorate in philosophy from Indiana University. Dr. Pook is alive and currently resides in Warner, New Hampshire. We have not interviewed him.

Our review of Dr. Pook’s faculty file shows that in May 2002, then Dean of Faculty Candice J. ‘Candy’ Dale and Administrator 3 met with Dr. Pook to discuss inappropriate

incidents in his religious studies class. Ms. Dale and Administrator 3 had learned from a female student that Dr. Pook used her as an example of “some moral dilemma” by demonstrating how “uncomfortable she grew as he threatened to stick his tongue in her ear and began to do so ... getting closer and closer to her face and ear ... but never actually doing so.” The female student also reported that Dr. Pook would “occasionally flip his tongue in and out of his mouth at her” during crew practices when other students were not paying attention. According to Ms. Dale’s notes summarizing the meeting with Dr. Pook, she and Administrator 3 told Dr. Pook that he owed the female student an apology and that his “actions should cease immediately.”

At the same meeting in May 2002, Ms. Dale and Administrator 3 also addressed concerns that were raised related to Dr. Pook’s conduct as house master in Kittredge II. Ms. Dale and Administrator 3 advised Dr. Pook to be “more sensitive to the privacy needs of young adolescent women,” and told him that he should “bend over backwards to stay out of their private space.” For example, Ms. Dale and Administrator 3 had learned from female students in Kittredge II that Dr. Pook was coming into their rooms at night and sitting on their beds while they were in their pajamas and preparing for bed. Ms. Dale and Administrator 3 suggested that Dr. Pook speak to Faculty 48, an SPS house master in another female house, who could help Dr. Pook navigate how best to do his job without intruding on anyone’s private space. Ms. Dale and Administrator 3 also indicated to Dr. Pook that a few female students had told them that he would come down into the common area of the house after having “several drinks” and “clearly had alcohol on his breath.” Dr. Pook did not deny the comments, but said instead that he “did not drink more than one drink at a time.”

On June 13, 2002, Administrator 4 emailed Ms. Dale to discuss a comment she received from a crew coach about Dr. Pook’s conduct in coaching the team. Administrator 4 was told that Dr. Pook was “intimidating to most of the girls,” and was “targeting the girls who needed support to gain their attention.” She was also told that Dr. Pook was taking certain female students on one-on-one walks to “talk about life.” Ms. Dale and Administrator 4 agreed that Administrator 4 would monitor Dr. Pook’s coaching methods with the crew team during the following season and would report to Ms. Dale. Dr. Pook’s faculty file indicates that Administrator 4 did monitor Dr. Pook during the Spring 2003 crew season, and “felt comfortable with [his] work within the team.”

In September 2004, Ms. Dale learned of inappropriate incidents that occurred in Dr. Pook’s Humanities V class. In a letter to Dr. Pook dated September 23, 2004, Ms. Dale summarized a meeting she had with him on September 21, 2004. Ms. Dale wrote that “swearing and using crude language, whether in anger or not, is totally unacceptable in any St. Paul’s classroom setting.” She also wrote about an incident in which Dr. Pook had “accidentally” pulled a chair out from under a student which resulted in the student falling onto the floor. She encouraged Dr. Pook to find other methods of demonstration which “will not involve touching or moving the students about with your force.” Finally, Ms. Dale reminded Dr. Pook of his previous conversation with her and Administrator 3 in May 2002 about putting his tongue close

to a female student's face and ear, because she learned this time that Dr. Pook had licked his finger and put it in the ear of a student. She wrote, "I was most surprised to hear that you would even consider the idea of a 'wet willy,' an action so similar to this past event, which we had determined together was totally inappropriate." Ms. Dale told Dr. Pook that he must be more "deliberate and careful" in his interactions with students, and explained that SPS would be providing him with "boundary training" which Ms. Dale would be arranging in the near future.

On December 6, 2004, Linda S. Johnson, Esq. met with Dr. Pook for the purpose of an "interactive discussion about appropriate boundaries and behavior between faculty and students." Attorney Johnson advised Dr. Pook at the outset of their meeting that she was counsel for SPS. The nature of Attorney Johnson's discussion with Dr. Pook focused on teacher to student behavior, including the various roles of the teacher as an instructor, advisor, and house master. In her letter to Ms. Dale on December 13, 2004, Attorney Johnson described Dr. Pook as "open-minded and conversant" during their meeting. She wrote, "he was apologetic about his behaviors that lead to this meeting and stated his desire not to engage in any inappropriate behaviors that would cause students to be uncomfortable." Some of the guidelines Dr. Pook agreed to adopt were: not to swear in class or around students; maintain safe physical space with students; knock before entering a student's room; don't sit on a female's bed, such as, when they are in their pajamas or already in bed.

In a letter to Dr. Pook dated September 25, 2006, Ms. Dale, then Vice Rector for Faculty, thanked him for meeting with her on September 17, 2006 and again with her and then Rector William R. 'Bill' Matthews, Jr. on September 22, 2006. Ms. Dale and Rector Matthews met with Dr. Pook to discuss their concerns about recent "boundary issues" that had been raised by students in his Advanced Studies Program course. One student reported that Dr. Pook "placed [his] fingers in a girl's water bottle, flicked her with the water, and then threatened to pour it over her head while she pleaded for [him] not to." Ms. Dale wrote, "this action was totally inappropriate and a poor way for you to make a point." She suggested counseling services for Dr. Pook, which she said would help him "move forward," but made clear that if Dr. Pook was "unable to commit to the important responsibility we all have to treat all of our students with respect and to maintain appropriate boundaries with students at all times and in all places" then she and SPS would need to "rethink" his future at the School.

On October 21, 2008, SPS reached a Severance Agreement and General Release with Dr. Pook, which effectively ended his employment at SPS as of that date and placed him on a personal leave of absence until June 12, 2009. Dr. Pook received severance benefits from SPS through February 28, 2009, and his official date of resignation from SPS was on June 13, 2009. After announcing to the SPS community that Dr. Pook would be taking a personal leave of absence, one female student in particular "grieved" his departure. According to an email from Rector Matthews to then counsel for SPS David Wolowitz, Esq., the parents of Student 94 had discovered that she and Dr. Pook had developed a "close relationship built on strong friendship," but that based on their questions to her they did not believe Dr. Pook intended to harm or

endanger her. Rector Matthews shared with Student 94's parents that in 2004, Dr. Pook had received boundary training based on incidents in which he entered female students' rooms "unannounced" and sat on their beds. Rector Matthews also indicated that a year or two later Dr. Pook was again "spoken to" about going for "bike rides" alone off-campus with a female student. We initially requested Student 94's contact information and student file from SPS on July 31, 2017, but based on her involvement in the ongoing investigation by the New Hampshire Office of the Attorney General we were unable to speak with her.

Dr. Pook was arrested by New Hampshire law enforcement authorities on February 28, 2018 and charged by the New Hampshire Office of the Attorney General with two counts of witness tampering and two counts of conspiring to commit perjury, both stemming from his involvement in the ongoing investigation into SPS by the New Hampshire Office of the Attorney General. As of June 4, 2018, the case against Dr. Pook was still moving forward in Merrimack County Superior Court in Concord, New Hampshire after a judge granted prosecutors additional time to seek a grand jury indictment.

Victim Account 1: Student 113

Student 113, who requested anonymity, initially sent Rector Hirschfeld a letter by email on March 12, 2018, in which she disclosed her experiences with Dr. Pook as a student. After receiving Student 113's letter from SPS, we discussed her experiences with Dr. Pook during our telephone interview with her on April 27, 2018. She told us she felt "compelled" to write to Rector Hirschfeld "really for a sense of closure." Dr. Pook was her Humanities V teacher, and she recalled him often giving her "individual reading assignments," such as *Lolita*, a novel about a middle-aged literature professor who is obsessed with a twelve year-old girl with whom he becomes sexually involved after he becomes her stepfather, or once a *New Yorker* story about a high school student who marries her teacher. She said, "there was grooming through bizarre conversations and assignments," and added, "it all strikes me as odd now, but it didn't so much at the time."

Student 113 recalled spending "lots" of one-on-one time with Dr. Pook, discussing literature and poetry, and said, "he would ask me to get in his car and leave campus alone with him." She and Dr. Pook went off-campus together a "handful of times" to eat at Friendly's or a diner. On one particular occasion, Student 113 told us Dr. Pook was driving his car, with her seated in the passenger seat, and leaned over the middle console to "smell my hair ... and then ask about my perfume." She also recalled occasions where Dr. Pook would invite her to his apartment in Kittredge II, where they would watch a movie together while he consumed alcohol. According to Student 113, Dr. Pook's wife was not there, and while she had no recollection of him crossing any physical boundaries, she said, "he did hug me ... like a full frontal bear hug." She also told us Dr. Pook once said, "I love you," which made her feel obligated to say "I love you" back.

While Student 113 told us that her “misgivings” were not strong enough to report Dr. Pook at the time, she did remember speaking with her former house master, Faculty 49, more recently about Dr. Pook’s conduct. She said, “[Faculty 49] said in retrospect that Pook was weird ... [and] intimated to me that she told another faculty member about her concerns about Pook at the time.” Although Student 113 recalled “overlook[ing] some of the things” Dr. Pook did at the time, she told us it was because of his “charisma and knowledge,” as well as the fact that he was “one of the three or four best teachers” she ever had.

Victim Account 2: Student 114

Student 114 initially disclosed her experiences with Dr. Pook to Administrator 5 on April 18, 2018. After receiving notice from SPS that Student 114 was also interested in speaking with us, we contacted her by email and subsequently interviewed her by telephone on April 25, 2018. During our interview, she told us that Dr. Pook “displayed odd, inappropriate behavior often,” and added, “I had trouble with him.” She said, “I was disgusted by him.”

Dr. Pook was her house master during her fifth and sixth form years in Kittredge II, and while he never made any overt “sexual advances” toward her, she said, “there were a lot of gray areas.” She told us about the “knock and walk,” which is what she and the other female students in her house called it when Dr. Pook would “come into our rooms when we were in our towels.” She said, “rather than knocking and giving someone the chance to answer the door, he would knock and walk right in.” She added, “it was pretty common in fact,” and said, “we would say we were in our towels, but he would ignore it and come in regardless.” She also recalled Dr. Pook once coming into her room, while she and three or four other female students were present, and lying on her roommate’s bed and “trying to establish a bond with us.” According to her, “he was talking about drinking ... saying like I know you’re kids and I know you’re going to be drinking ... but just don’t make it too obvious and we’ll keep it all under wraps.” She added, “he wanted us to look at him as a friend, not as a teacher.” Student 114 told us that Dr. Pook also consumed alcohol in the house, and in front of her and other female students at their house meetings. She said, “he drank a lot.”

In the classroom, according to Student 114, Dr. Pook had a reputation for swearing and “being different.” He told his students to call him “Pook,” as opposed to “Dr. Pook” or “Mr. Pook.” However, it was in the house where she experienced what she called “the most disturbing thing.” According to her, Dr. Pook “took a liking” to her classmate Student 115. Student 114 told us that Dr. Pook “would hangout in [Student 115’s] room when she was changing,” and added, “she would have to hide behind her door to change ... she once caught him looking in the mirror.” She also told us that Dr. Pook once bought Student 115 a box of chocolates and put them under her pillow, she said, “that was the most bizarre thing he did.” According to Student 114, Dr. Pook’s “behavior toward [Student 115] was obvious.” She recalled then Dean of Faculty Candice J. ‘Candy’ Dale once asking Student 115 if she was uncomfortable with Dr. Pook, but, according to Student 114, Student 115 did not want to “get

involved.” Similarly, Student 114 recalled Administrator 3 once asking Student 116 whether or not Dr. Pook was inappropriate in their house. She recalled this occurring in the spring of 2002, but said Student 116 also “denied everything ... [and] didn’t want to get him in trouble.”

Victim Account 3: Student 116

We interviewed Student 116 on May 15, 2018 about her experiences with Dr. Pook as a student, and she told us “he was the stereotype of what you’d think one of these guys would be.” According to her, Dr. Pook had a “cult following” among the students, and “didn’t care for rules that much.” She said, “a lot of the other faculty didn’t like him ... which helped his case with the students.”

Dr. Pook was Student 116’s house master during her fifth and sixth form years in Kittredge II. As her house master, she said, “he was often drunk ... and very inappropriate with female students. She added, “he would say I won’t tell on you, if you don’t tell on me.” Over time, Student 116 told us Dr. Pook went from being the “cool teacher” to being “a very inappropriate presence.” She could not recall then Dean of Faculty Candice J. ‘Candy’ Dale ever asking any female students about Dr. Pook’s inappropriate behavior, but did recall Administrator 3 doing so in the spring of 2002. She said, “[Administrator 3] interviewed girls who lived in his dorm, because she had heard he was acting inappropriately,” but, according to Student 116, everyone “lied on his behalf” in order to “protect him” and because they did not view him as “a real threat.”

Student 116 also recalled Dr. Pook once coming into her room while she was changing out of a towel, she said, “he walked in while I was in a towel and sat on the bed.” She told us she was on “room bounds” at the time, which meant she “could not leave,” and that Dr. Pook “sat there for about ten minutes” while she changed. In particular, however, Student 116 recalled Dr. Pook directing his inappropriate behavior toward Student 115. She said, “he grabbed her arm once while she was in a towel ... she said get off of me ... and he said you’re so feisty.” She also remembered Dr. Pook giving Student 115 a box of chocolates.

Victim Account 4: Student 117

We interviewed Student 117 on May 24, 2018 about her experiences with Dr. Pook as a student, and she told us “he had a different approach.” Dr. Pook was Student 117’s house master in Kittredge II, and while her overall experience was “positive,” and she lived with a “group of girls” she still considers her “closest friends,” she did say it “wasn’t normal to have a male head of house in an all-girls dorm.” She called Dr. Pook an “ego-maniac,” and told us he “fed off of attention.” According to her, Dr. Pook had “adoring followers,” but she “didn’t get along particularly well with Pook ... because I didn’t buy into him being so special.”

Student 117 remembered Dr. Pook being “intoxicated” in the house on various occasions, and said, “he was always trying to be cool and peer-like with us ... but I thought he could be really rude and insensitive too.” She said, “he would lounge on our beds ... or on our couches ... while we were coming back from the showers and changing.” While Student 117 did not report Dr. Pook to any SPS faculty member or administrator at the time, she told us that she was “not surprised at all” when recent allegations emerged publicly about him. She said, “he came across as someone who thought he had power of people ... I can see how a girl could get caught up with him.”

Victim Account 5: Student 118

We interviewed Student 118 on June 7, 2018 about her experiences with Dr. Pook as a student, and she told us “from the moment Pook arrived ... he had an aura about him.” Dr. Pook was her Humanities V teacher as well as her house master in Kittredge II. She compared him to Robin Williams’ character in the film *Dead Poets Society*, and said, “students looked up to him ... he was not your mainstream type of guy.”

Student 118 told us that Dr. Pook “definitely” consumed alcohol, and said, “he was visibly drunk in the dorm on multiple occasions.” She told us about one night in particular when he “came down pretty drunk,” and, according to her, most of the other female students in the house were still awake. She told us he looked at her and said, “we’re going on a field trip.” Student 118 then followed Dr. Pook outside to his car, where he told her “we’re going to Wendy’s to get milkshakes.” Once in his car and on the road, she said, “he was driving fast and blasting music ... and he passed the exit,” she added, “he looked at me and said are you worried I’m going to kidnap you.” Though she recognized that Dr. Pook driving intoxicated with her in his vehicle was “a little scary,” and said, “I very clearly felt it was inappropriate to be driving with him on the highway while he was drunk,” she also told us she did not report it to any SPS faculty member or administrator at the time. Her reason for not doing so was because, according to her, Dr. Pook made her feel as though he was “on her side.” She told us he made a “pact” with her that night by saying, “I know you party ... just keep it off campus ... I’m cool ... you’re cool.”

Student 118 remembered Dr. Pook routinely not observing “normal boundaries” as her house master, she said, “the way he behaved ... he would go in the room of my two friends and lie on their beds.” She also recalled him once going into Student 115’s dorm room, and said, “she had a humidifier on ... and he said you young girls must keep moist.” She recalled then Dean of Faculty Candice J. ‘Candy’ Dale and Administrator 3 asking female students in Kittredge II about Dr. Pook’s conduct in the spring of 2002, though she said, “nothing ever came of it.”

Victim Account 6: Student 115

We interviewed Student 115 on July 10, 2018 about her experiences with Dr. Pook as a student, and she told us he was a “total creep ... just a disgusting person.” Dr. Pook was her teacher and her house master in Kittredge II during her sixth form year. She recalled Dr. Pook giving her “special attention” that she “didn’t want.” According to her, Dr. Pook said “suggestive things” to her as well, such as “you know where to get it if you want it.” She remembered him once standing in the doorway of her dorm room while she was changing out of a towel, she said, “he would stay in the doorway even after we told him we were changing.” She also remembered at least two occasions where Dr. Pook could definitely see her changing given where he was standing. On another occasion, Student 115 was going from the bathroom to her dorm room in a towel and Dr. Pook tried to pass her in the hallway, she said, “excuse me” to which he replied, “you’re feisty ... just the way I like them.”

Student 115 also told us about an incident one night where Dr. Pook was “very drunk in the dorm” and “annoyed” with her for leaving her squash bag on the landing by the stairs. She said, “I had left my squash bag on the landing ... so he took it and threw it over the landing.” According to her, Dr. Pook ended up breaking her squash goggles and she “called him out.” She told Dr. Pook “you can’t treat us like this,” and, as she recalled, he “turned into a big baby ... and might have even shed a tear.” Not long after the incident in which he broke her squash goggles, Dr. Pook put a box of chocolates under her pillow. She said, “I actually thought everyone got chocolates at first, but then it turned out it was just me,” she added, “I might have talked to him about it too ... like why he had given me the chocolates.”

During the one year Student 115 lived with Dr. Pook in Kittredge II, she told us that then Dean of Faculty Candice J. ‘Candy’ Dale and Administrator 3 questioned her about Dr. Pook’s conduct in the house. Student 115 told us that she reported to Ms. Dale at the time that Dr. Pook had watched her while she was changing in her dorm room, however, she did not report that he had also given her a box of chocolates. She said, “I came away thinking nothing was going to change,” but added, “I loved Candy Dale.” Student 115, who told us she felt Dr. Pook “should never have been in a female dorm,” also told us that she did not remain in touch with him after her graduation from SPS. She said, “I was pretty thrilled not to see him anymore.” While she remains a “huge fan” of SPS, and said she still “love[s]” the School, she also said, “Pook should be locked up.”

Witness Account 1: Student 119

Student 119 initially emailed Rector Hirschfeld on March 8, 2018 about her experiences with Dr. Pook as a student. After receiving her email correspondence from SPS on March 12, 2018, we interviewed her by telephone on May 22, 2018. Student 119 told us that Dr. Pook was her house master in Kittredge II during her sixth form year, but said she first got to know him earlier as her crew coach. She said, “he had a cult following ... girls really wanted to live in his

dorm ... I thought he hungout in girls dorm rooms too much.” She added, “he often smelled like alcohol.” Student 119 told us that Dr. Pook “disgusted” her, and said, “he made me very uncomfortable.”

As her crew coach, she recalled him “bending the rules” and “cursing a lot.” She said, “he always wanted to be perceived as cool.” She told us about one incident in particular called “Newb Night,” which she described as “a night when you basically welcome the new students to their houses and sports teams ... but you also ... I guess ... what we would today say is haze them.” She added, “they’re new students ... so we mess with them ... we give them a new name ... we blindfold them ... make them do things ... that sort of thing.” According to her, Dr. Pook “knew” about “Newb Night,” and knew that it occurred in Kittredge II and within the crew team. She said, “we talked about the things we did to the new students openly with Pook ... so he knew all about it ... he encouraged it.” She added, “he actually told us that it was a good tradition ... and that we should do it.”

During Student 119’s sixth form year, a new student to SPS told her parents about “Newb Night” and her parents subsequently complained to the SPS administration, which led to Student 119 and other female students being sent to the Disciplinary Committee. According to Student 119, she and the other female students initially “covered” for Dr. Pook and did not tell the Disciplinary Committee that he knew about their plans for “Newb Night,” however, once they discovered they were facing expulsion, they “quickly” changed their stories and told the Disciplinary Committee that “Pook told us everything we did was okay ... and that because of that we didn’t know anything we did was wrong.” Dr. Pook denied ever knowing anything in advance of “Newb Night,” according to her, and she and the three other female students were subsequently suspended for three months. She said, “we missed almost the entire fall semester.”

Student 119 told us she recalled other female students at the time reporting that Dr. Pook had come into their rooms while they were changing, but she said, “I don’t think Pook ... [is] a good reputation of St. Paul’s.” Though she added, “I am certainly not surprised that the School wrote Pook a recommendation to another school after the fact.” She said, “that is exactly what I would expect of them, because they do not want to be in a position where they have to look bad ... it’s just terrible that they allowed him to go into another school and be around young women without any warning to that school.”

Witness Account 2: Faculty 49, former faculty member and house master (1996 – 2007)

We interviewed Faculty 49 by telephone on May 15, 2018 about her recollections of Dr. Pook. As a faculty member, Faculty 49 did not teach with Dr. Pook, but said, “I remember kids talked about him all the time ... from the moment he got there.” Faculty 49 confirmed to us that she had concerns about Dr. Pook at the time. She recalled Student 113 once telling her that she had gone off-campus to a diner alone with Dr. Pook, and said, “I told her that was kind of weird.”

Faculty 49 also told us about Student 89, who she recalled going through difficult issues as a student. Student 89 was also a student of Dr. Pook's at the time, and Faculty 49 recalled Dr. Pook once calling her and asking her if he could come to her apartment to discuss Student 89. Faculty 49 said, "I felt like he was digging for info ... he wanted to know about her ... how she was psychologically ... it made me really uncomfortable." According to Faculty 49, this was the first time Dr. Pook crossed her "radar." On another occasion, Student 89 was scheduled to go home on health leave and Faculty 49 wanted to say goodbye before she left. Upon arriving at Student 89's dorm room, Faculty 49 noticed that her door was closed. She said, "I knocked first and then opened it ... and Pook was sitting on the edge of her bed," she added, "he got up immediately and she looked really distraught."

After that incident, Faculty 49 recalled going "right away" to then Dean of Faculty Candice J. 'Candy' Dale and saying, "I do not feel right about this guy." She remembered Ms. Dale "nodding gravely" and saying, "thank you for bringing this to my attention." According to Faculty 49, Ms. Dale indicated at the time that she was "creating a paper file" on Dr. Pook. While she only spoke to Ms. Dale about Dr. Pook on that one occasion, Faculty 49 recalled having multiple conversations with Administrator 3 about him at the time. Eventually, however, Faculty 49 "gave up" and came to the realization that nothing was going to happen to Dr. Pook. She said, "he later ended up getting his own house on campus ... and the rumor was that he was put into the house due to drinking and being drunk in the dorm."

Between April 16 and May 30, 2018, we attempted on multiple occasions to schedule a telephone interview with Student 89. To date, she has declined our request.

Witness Account 3: Administrator 3, former faculty member, administrator, associate dean, and vice rector

After learning from SPS on May 18, 2018 that Administrator 3 had retained counsel related to the ongoing investigation at SPS by the New Hampshire Office of the Attorney General, we contacted Administrator 3's attorney on May 21, 2018 to request an interview. On May 30, 2018, we received an email from Administrator 3's attorney declining our request.

Witness Account 4: Candice J. 'Candy' Dale, former faculty member, Academic Dean, Dean of Faculty, and Vice Rector for Faculty (1991 – 2018)

After learning from SPS on April 30, 2018 that Ms. Dale had retained counsel related to the ongoing investigation at SPS by the New Hampshire Office of the Attorney General, we contacted her attorney that day to request an interview with her. We interviewed Ms. Dale by telephone on June 8, 2018 about her recollections of Dr. Pook's tenure at SPS. Ms. Dale recalled Dr. Pook being hired by SPS in 2000, one year prior to her appointment as Dean of Faculty, thus she said, "I did not hire him." She was also on sabbatical during the 2008 – 2009 academic year

when Dr. Pook was terminated, and said it was Faculty 50 who served as interim Vice Rector for Faculty at the time.

Ms. Dale told us that she “kept records” on Dr. Pook as soon as she became aware of his inappropriate conduct. According to her, the first time was in 2002 when Administrator 3 raised concerns with Ms. Dale that Dr. Pook was “making girls feel uncomfortable in Kitt II.” Ms. Dale told us that she and Administrator 3 met with some of the female students in Kittredge II to discuss Dr. Pook. She said, “some told me they were uncomfortable with him and some said they were not.” Ms. Dale learned that Dr. Pook had been “sitting on girls beds ... [and] drinking in his apartment and then going down into the dorm.” Ms. Dale denied ever being told at the time that Dr. Pook had lied on any of their beds or that he had been in their rooms while they were in towels. She said, “that’s just creepy,” and added, “I didn’t think he gave them enough space.” According to her, she told the female students that she would be contacting Dr. Pook and having a conversation with him.

Based on her meetings with Administrator 3 and various female students in Kittredge II at the time, Ms. Dale decided, after consultation with then Vice Rector Dr. Sharon D. Hennessy and Rector Bishop Craig B. Anderson, that Dr. Pook needed sensitivity training. Ms. Dale met with Dr. Pook, and, among other things, told him that he needed to request permission before entering any female student’s dorm room. According to her, Dr. Pook said he “understood” about knocking first and told her that he would no longer just walk in. Ms. Dale recalled Dr. Pook being “very defensive” during their meeting, which occurred toward the end of the 2001 – 2002 academic year, and said, “he was very adamant that he did not drink in front of the girls.” However, she told us she thought the meeting went “very well,” and said, “after 2002 ... I never heard of another complaint about him in the dorm.”

In 2004, however, Ms. Dale became aware of incidents with Dr. Pook in his Humanities V class. She said, “some of the girls came to me ... and a teacher came to me as well ... about David swearing in the classroom ... I was also told that he pulled a chair out from underneath a student as they were going to sit down ... and that he licked his finger and approached a girl from behind ... and put his finger in her ear.” While Ms. Dale told us that Dr. Pook was a “bright, competent teacher,” she said, “I immediately called him into my office to have a meeting with him about this.” According to her, Dr. Pook said he would “improve” and “understood” her concerns. Ms. Dale put notes from her meeting with Dr. Pook into his faculty file, and also wrote him a letter summarizing their conversation which she put in his file as well. At this time, Ms. Dale told us SPS also decided to hire Linda S. Johnson, Esq. to conduct “one-on-one sensitivity training” with Dr. Pook. Ms. Dale recalled first consulting with Dr. Hennessy about this, and said, “given my role ... she wanted me to mentor him as a teacher.” According to Ms. Dale, she spoke with Attorney Johnson by telephone at the conclusion of her one-on-one training with Dr. Pook and was told that Dr. Pook “understood that what he did was wrong and wanted to remain on the faculty at [SPS].”

In 2006, however, Dr. Pook was once again involved in another inappropriate incident. Ms. Dale said, “things happened in different areas with him ... and it was every two years it seemed.” This time, Ms. Dale would learn from Administrator 6 that Dr. Pook was “biking alone” with a female student. Ms. Dale “immediately” approached Dr. Pook about this, because, according to her, it was not the first time that he had been “warned” about going places alone with female students. As a coach of the female crew team, Dr. Pook had once been accused by another coach of being “too close” with certain female students. Ms. Dale said, “she told us he was taking walks alone with girls in the woods.” According to Ms. Dale, Administrator 3 decided to “watch” Dr. Pook at the time and mentor him in his role as a crew coach the following spring. Ms. Dale said, “she attended practices and kept an eye on him,” and told us that Administrator 3 ultimately decided Dr. Pook was “doing okay.” Thus, in 2006, when Ms. Dale learned that Dr. Pook was once again going off-campus alone with a female student, she said, “I told him it was not something he should be doing.”

Throughout Dr. Pook’s tenure at SPS, Ms. Dale told us she “documented everything” and always brought each incident up the chain of command. She said, “it’s fair to say that my antennae were up.” She also recalled suggesting “early on ... probably in 2002” that Dr. Pook move to a male house, but Dr. Pook said he “enjoyed working with girls.” According to her, it was “not completely unusual” to have a male house master in a female house. She said, “we have had women run male dorms and have had men run female dorms ... it happens.” That said, Ms. Dale did question how Dr. Pook assumed his role as a house master so quickly. With regard to Dr. Pook eventually moving into his own house on campus, Ms. Dale could not recall what led to the decision, nor could she tell us why Dr. Pook was asked to leave SPS during the 2008 – 2009 academic year. She said, “I don’t know what happened ... I was away from the School that year and have no knowledge of the details,” but added, “it was not related to sexual misconduct ... it had to do more with his approach.”

Witness Account 5: Student 120

We interviewed Student 120 on May 31, 2018 about her experiences with Dr. Pook as a student, and she told us Dr. Pook was her teacher during his first year at SPS. She said, “he was known to be creepy ... he definitely had a creepy feeling about him.” Student 120 recalled him being “very friendly,” and said, “he certainly wanted to be friends with all of the girls.” One thing in particular that she recalled was Dr. Pook assigning the class to read *Lolita*, and then asking her and Student 121 to do an “interpretive dance” for him instead of a written report. She said, “he assigned everyone else a report to write, but told us that we could perform a choreographed dance for him.” Student 120 recalled Dr. Pook coming to the ballet building one day to watch the two of them perform their routine. She said, “my memory is that it was just him ... he was the only one there ... he just sat and watched us dance.” While Student 120 made clear that she and Student 121 performed a “classical ballet routine,” and said, “it wasn’t anything beyond that,” she did add, “looking back on it now, it shows his pattern of behavior.”

Witness Account 6: Student 121

We interviewed Student 121 on June 11, 2018 about her experiences with Dr. Pook as a student, and she said, “generally this whole thing bums me out.” Dr. Pook was Student 121’s teacher during his first year at SPS, and she said he was “phenomenal ... a very interesting teacher.” She added, “I liked his teaching ... while nonconventional, he connected his teaching to real life.” Student 121 took three classes with Dr. Pook that year, and recalled doing an “interpretive dance” with Student 120. According to her, she and Student 120 videotaped their ballet routine and submitted it to Dr. Pook. She said, “I remember we choreographed it together in the dance building, but I have no memory of him coming to watch it there,” and added, “it was a very classical ballet performance ... nothing inappropriate ... so there’s really nothing beyond that to report about it.”

Student 121 told us she was “relatively surprised” when recent allegations emerged about Dr. Pook. She said, “the fact that it came out to the extent it did ... a sexual relationship ... made me sad.” She told us that Dr. Pook and his wife had been “a safe place ... a refuge” for her during her sixth form year. She had a “close relationship” with both of them, which is why she was “bummed out” when she learned of the allegations against him. She said, “this whole thing makes me sad ... honestly.”

Witness Account 7: Student 122

After learning from Student 118 that Student 122 lived in Kittredge II with Dr. Pook as his house master and that, according to Student 118, Student 122 knew Dr. Pook well, we sought to interview him.

We interviewed Student 122 on June 18, 2018 about his experiences with Dr. Pook as a student, and he told us that he lived in Kittredge II during Dr. Pook’s first year at SPS. According to him, Kittredge II was a male house before it became a female house. He said, “[Dr. Pook] was also my Humanities V teacher.” Student 122 only had “overwhelmingly positive memories” to share about Dr. Pook. He said, “as our head of house ... he’s someone who I felt had our best interests at heart ... he made himself available to speak to anyone ... he would talk to us about natural student life issues ... I always felt he was genuinely concerned about the welfare of the students in the house, and the younger students in particular.” Student 122 felt a “familiarity” with Dr. Pook, which is something he did not feel with his other house masters, and said, “he really tried to be someone you could feel comfortable being honest with.”

As a teacher, Student 122 said Dr. Pook was “tough” and could be “unsparing in his criticism.” He had no recollections of Dr. Pook ever behaving inappropriately in the classroom, and said, “everything always seemed above board with him.” While Student 122 recalled Dr. Pook “enjoy[ing] a single malt scotch” and said there were nights when he and the other male

students in the house “collectively wondered if he had been drinking” because he seemed intoxicated, he said, “he never drank in front of me.”

Student 122 told us he has been “bothered” by the recent allegations made against Dr. Pook, and said, “I had no sense that this type of stuff was ever rumored to be going on.” He did, however, recall hearing from some female students in Kittredge II the following academic year that they were “uncomfortable” with Dr. Pook. He remembered being told that Dr. Pook was “coming into their rooms while they were in their pajamas ... or while they were changing ... and leaving chocolates for girls under their pillows.” At the time, however, he “dismissed them,” and told us “they seemed completely incongruous to the Pook I knew.” When asked if he was surprised at the time, he said, “surprised is short of the mark, I flat out did not believe it,” but added, “I was told nothing at the time that was explicitly inappropriate though.”

Student 122 called Dr. Pook “one of the best teachers I ever had,” and said, “he changed my life,” though he added, “I am sorry that I did not believe my female friends and classmates ... and I’m sorry that they did not have the same positive experience with him that I had.”

10. Richard A. Rein

Richard A. Rein was a ballet instructor and Director of the Dance Department and SPS Ballet Company from 1974 to 2001. He received his bachelor’s degree from Adelphi University. Mr. Rein is believed to be alive and currently residing in Lake Worth, Florida. We have not interviewed him.

Our review of Mr. Rein’s faculty file shows that on April 25, 2001, Faculty 40 wrote to Administrator 7 about overhearing one of her advisees, Student 120, complaining about how “demeaning” Mr. Rein was to Student 117. Faculty 40 also reported that she heard Student 120 say “he slapped me on the bottom.” Administrator 7 brought Faculty 40’s comments to the attention of then Vice Rector Dr. Sharon D. Hennessy, who requested that counsel for SPS David Wolowitz, Esq. meet with Administrator 7 to develop questions that Administrator 7 could use in interviewing some of the students in Mr. Rein’s ballet program about his conduct.

From April 30 through May 3, 2001, SPS conducted an internal investigation into Mr. Rein’s conduct as Director of the Dance Department and SPS Ballet Company. Internally the investigation was spearheaded by Dr. Hennessy, with Administrator 7 reporting directly to her, and with Attorney Wolowitz providing counsel. As part of the investigation, SPS sought to interview all twenty-two (22) members of the Ballet Company. Eleven (11) students were interviewed by Administrator 7 and Administrator 1, seven (7) were interviewed by Administrator 7 and Administrator 8, and three (3) were interviewed by Administrator 7 alone. Administrator 7 and Administrator 8 also interviewed Mr. Rein. On May 3, 2001, SPS’s Sexual Harassment Board convened to discuss the findings of the internal investigation and decided at

that time to proceed with an investigation using an outside investigator who would report findings to the Board. The Board chose Attorney Wolowitz.

Attorney Wolowitz reviewed the notes and findings of Administrator 7, Administrator 1, and Administrator 8, and also conducted his own interviews with six (6) ballet students as well as with Faculty 40 and Mr. Rein. On May 7, 2001, Attorney Wolowitz provided a written summary of his findings to the Board. On May 8, 2001, after reviewing Attorney Wolowitz's findings, the Board held a hearing at which Mr. Rein was present. The Board provided then Rector Bishop Craig B. Anderson with a report of their findings on May 17, 2001. The Board unanimously voted that "based on a preponderance of evidence that Sexual Harassment did occur." The Board determined that Mr. Rein's conduct was based on "the gender of students, unwelcome by students, and was so pervasive that it had the effect of unreasonably interfering with an individual's work performance or academic performance by creating an intimidating, hostile, or offensive educational environment." The Board, however, found Mr. Rein to be "capable of changing his behaviors" and recommended that he take "time away" from SPS to seek counseling before returning to the Dance Department.

Based on the Board's findings, Mr. Rein retained counsel on May 31, 2001. On June 4, 2001, then SPS counsel Robert B. 'Bob' Gordon, Esq. entered into severance discussions with Mr. Rein's counsel which lasted until July 2001. On July 22, 2001, SPS and Mr. Rein entered into a Memorandum of Understanding in which Mr. Rein acknowledged and accepted his behaviors within the Dance Department, and agreed that he would submit his voluntary resignation effective immediately and would permanently vacate his campus residence no later than September 1, 2001.

Victim Account 1: Student 120

During our telephone interview with Student 120 on May 31, 2018 about her experiences as a student with former faculty member Dr. David O. Pook, she said, "my experience with Richard Rein was much worse than anything I remember with Pook." Student 120 indicated having talked to the Concord Police Department about Mr. Rein three years ago, and said, "Rein was so much more of a negative presence at the School and in our lives than any other faculty member by far." Student 120 told us that Mr. Rein eventually left SPS during her sixth form year after an internal investigation was conducted by then Vice Rector Dr. Sharon D. Hennessy.

Student 120 said she came to SPS as a fourteen year-old third form student "solely for ballet." She said, "I interviewed with Rein before I got in ... and once there, he became the main figure in my life at the School." She told us that she began "butting heads" with Mr. Rein, however, because he was "wrong ... in the sense that he would verbally intimidate us ... and say sexually intimidating things to us." She recalled Mr. Rein saying "a lot of really mean things" to her, and added, "[he] humiliated me in front of others." According to her, he said "sexually inappropriate things" about her body, and in particular about her breasts. She told us that

because “a lot of this was in front of others” that she often spoke up against his comments, which led him to remove her from “key parts” in performances.

Student 120 told us that she spoke with an attorney during her sixth form year as a part of the internal investigation commenced by Dr. Hennessy, and while she could not remember the attorney’s name, she did recall that “before any of us spoke to the lawyer ... Rein threatened us.” She said, “he said that it was his department and he could decide how to run it ... and he told us not to speak to the lawyer,” and added, “a lot of girls didn’t talk to the lawyer, because he threatened us and they feared him.” According to Student 120, SPS eventually “forced” Mr. Rein to retire. When she was contacted by the Concord Police Department three years ago, she told us she was asked if Mr. Rein had ever “sexually assaulted or molested” her. She told the Concord Police that he had not, but added, “he did slap me on the ass though ... and talk about my breasts a lot.” Student 120 told us that she did not continue her ballet career after graduating from SPS, she said, “sadly it had a tumultuous ending when all of this stuff happened with Rein.”

Victim Account 2: Student 123

Student 123, who requested anonymity, initially contacted us by email on May 31, 2018 to say that she planned to speak to us “in the near future” about her experience as a student at SPS. We contacted her that day by telephone, but she was reluctant to speak with us. She told us that she had an attorney, and that she and SPS had previously reached a confidential settlement agreement related to her experience as a student at SPS. Between May 31 and June 29, 2018, Student 123 emailed our team numerous SPS articles, as well as lengthy summaries she wrote, about various former faculty members at SPS. After clearing up certain issues of confidentiality that were raised by her, and based upon she and counsel for SPS agreeing that she would speak to us, we interviewed her by telephone on July 10, 2018 about her experiences as a student with Mr. Rein.

Prior to arriving at SPS, according to Student 123, she and her mother met a “woman at a dance store” who told them that Mr. Rein was “a bad person.” She said, “she warned me about him before I ever set foot on the campus.” Student 123 told us that she entered SPS as a fourteen year-old third form student, and added, “I weighed ninety pounds and was there to be a dancer.” She first met Mr. Rein during her third form orientation, she said, “we were on a bus trip ... and he and I spoke the whole time.” She added, “the first inappropriate comment he made to me was on that trip, when he said ... there’s no reason to worry about your weight until you have had your period regularly.” Student 123 told us that Mr. Rein had been “obsessed” with another female student who was a couple of years ahead of her, and that he asked her to “dye my hair blonde at the age of sixteen” because the other student had blonde hair.

Student 123 told us that her relationship with Mr. Rein evolved from him being simply her dance instructor to the two of them going off-campus together “into town ... where we would go grocery shopping” and then to him “cooking privately” for her in his home. She told us he

would often prepare dinner for the two of them, she said, “he made us Chinese food the first time ... and it felt very much like a first date.” Student 123 recalled the two of them being alone and Mr. Rein telling her that his home was also her home, and that he felt “kind of like a parent” to her. She said, “it was completely invasive,” and added, “he asked me very personal questions ... which often made me cry ... and which led him to rub my inner thighs up and down ... coming very close to my groin.” When asked if anyone else ever witnessed Mr. Rein touching her, Student 123 said, “once in class ... he squatted down in front of me and took two fingers and went up my thigh directly to my crotch.”

She described her experience as Mr. Rein’s ballet student as “constant sexual harassment ... all the time.” She said, “he would stand on stage during practice and yell ... I want to see crotches flying by my nose.” Student 123 first came forward with allegations against Mr. Rein in the summer of 2014 when she contacted then Rector Michael G. Hirschfeld. She said, “I told him about Rein once groping my buttocks while making sexual noises during a dance practice when I was a student,” and added, “Michael reported this to the Concord Police.” She also told us that Rector Hirschfeld told her that he was “on the committee that decided to get rid of Richard Rein,” but added that “he once saw Rein on campus attending an event after being banned.” According to Student 123, she had no knowledge of the internal investigation conducted by then Vice Rector Dr. Sharon D. Hennessy during the 2000 – 2001 academic year. She said, “the School did not contact me ... and I was no longer a student there ... I only learned of the investigation because Rein sent around a letter to his former dance students requesting that we contact St. Paul’s in support of him ... which I did not do.”

Witness Account 1: Student 121

During our telephone interview with Student 121 on June 11, 2018 about her experiences as a student with former faculty member Dr. David O. Pook, she said, “I put [Mr. Rein] in the same bucket as Pook.” She added, “I was bummed out when everything happened with him too.” Student 121 told us she had a “close relationship” with Mr. Rein, and identified herself as “the one voice advocating for him during the School’s investigation.” She told us she was in “support” of Mr. Rein, and said, “he was a hard nut ... but he was not alone in his expectations in the dance world.” She added, “he wasn’t always the nicest person to deal with, but that’s common in dance.” Student 121 acknowledged that Mr. Rein could be someone who would “push” his ballet students to do better, she said, “he pushed me ... but I only have positive things to share about him.”

B. Other Reports Of Sexual Misconduct

We received a report of sexual misconduct by one (1) former administrator, which does not fit the criteria for category A and which we were unable to substantiate.

1. Administrator 9

Administrator 9 was a faculty member and administrator at SPS. Administrator 9 is deceased.

Victim Account 1: Student 124

On November 28, 2017, our team received an email with an attached letter from Student 124, which described allegations of sexual misconduct against Administrator 9. During our initial telephone interview with Student 124 on November 30, 2017, she told us that she was seeing a therapist and had told her therapist that she planned to write to and speak with us. Student 124 described her experiences with Administrator 9 as “absolutely horrible.” She said, “what he did to me was horrible.”

As a third form student, Student 124 told us that she was caught with alcohol on-campus and was subsequently sent before the Disciplinary Committee. According to her, the Disciplinary Committee, which was comprised of faculty and students, recommended that she be suspended. Instead, however, Student 124 was put on “room bounds,” which, according to her, meant that she was to remain in her room whenever she was not in class for a period of two weeks. Administrator 9 allegedly also required her to meet with him in the School’s Chapel every morning during that two week period. She told us that she was initially “fine with that,” and thought that she would be meeting Administrator 9 in the Chapel to “pray together,” however, according to her, that is not what happened at all.

She recalled her first meeting with Administrator 9 in the Chapel. She said, “we got there ... and I remember we walked all the way to the back of the Chapel ... there were seats on the right for the acolytes and then on the left [there was] a closet.” Student 124 told us that Administrator 9 took her inside that closet “all alone” where he “scream[ed] horrible things” at her. She said, “he berated me.” Student 124 tried to “move away,” but, according to her, the closet was so small that she could feel [Administrator 9’s] body pressing up against hers. She said, “it was so small in there and I was claustrophobic,” and added, “I was trying not to acknowledge that [Administrator 9] was pressed into my body.” According to her, this happened every morning over the course of two weeks. She said, “after it had happened a couple of times ... I remember by the time we would go and fold our coats over the back of the chair outside the closet I would start to feel sick.” Administrator 9 was allegedly yelling “really personal things” at her as well, which for a fourteen year-old was traumatizing.

Student 124 also recalled a teacher once witnessing her and Administrator 9 going into the closet, and said the teacher gave her “a sad look as if they felt sorry for me.” She could not recall the name of that teacher, but did, however, recall that she once reported Administrator 9 to Faculty 52. According to Student 124, she told Faculty 52 that Administrator 9 was taking her into the closet in the Chapel and screaming terrible things at her. According to her, Faculty 52

said “nothing,” which left Student 124 feeling “helpless.” She also provided the names of other students who she either recalled speaking to about this at the time or recalled being aware of it from having witnessed her with Administrator 9 in the Chapel, including Student 125, Student 126, Student 127, Student 128, and Student 129.

Student 124 also remembered reporting Administrator 9 to her mother as well. She told us that she told her about it “a few months after it happened.” She said, “I did not tell her in great detail ... but I told her that he brought me into a closet with him and that I was crying while he screamed at me.” She recalled her mother being “angry” at the time, but could not recall whether or not her mother spoke to any faculty member or administrator at SPS about it. Student 124 recalled Administrator 9 acting “normal” when she saw him after the two-week period had ended. She said, “when he saw me later on ... he never acted like anything inappropriate had happened.” She added, “he never mentioned it to me ... he never seemed embarrassed by it or anything.” For her, however, just seeing Administrator 9 after that made her “sick to [her] stomach.” Student 124 called what Administrator 9 allegedly did to her “deeply disturbing,” and said, “I was only fourteen years-old ... I just kept thinking why is he doing this to me and why is this happening ... it made me think that this was the way of the world.” She added, “it was evil ... it’s a vile memory to have in my head ... he said such terrible things to me ... terrible things about my family and where I came from ... it was horrible.”

Student 124 told us that she had initially sent her letter to Administrator 10 and Rector Hirschfeld prior to speaking with us. She said, “I talked to both of them a couple of times ... talking to [Administrator 10] was really helpful ... they encouraged me to write to you.” Student 124, who said that she has had “serious P.T.S.D. over the years [and] cannot be yelled at by someone without breaking down,” also said that she did not wish to remain anonymous in any reports. She said, “Write is as you wish ...” and indicated that she hoped telling her story would encourage other potential victims of Administrator 9 to come forward. She said, “I just want to know if there are others ... I know there will be.”

Our review of Student 124’s SPS student file did not uncover any records of any disciplinary action involving her, nor was there any record of her appearing before the Disciplinary Committee during her third form year.

Witness: Faculty 52, former faculty member, administrator, and vice rector

We interviewed Faculty 52 on December 20, 2017 about her knowledge, if any, of Student 124’s meetings with Administrator 9 in the SPS Chapel. Faculty 52 called Administrator 9 “a man of his time,” but added, “he was a[n] uptight type of guy.” Faculty 52, a history teacher and house master at the time, told us that Administrator 9 could be “hard on students,” and said, “you wouldn’t want to cross him,” but made clear, however, that “it was not about retribution with him as much as it was about helping the student get on the right track.”

When we explained the details of Student 124's allegations against Administrator 9 to her, Faculty 52 said, "that does not sound like [Administrator 9] to me." She also did not recall Student 124 meeting with her as a student and reporting Administrator 9's verbal abuse. She said, "I do not remember that," and added, "[Administrator 9] cared greatly about the School and its students ... he wanted the School to be the best that it could be." Faculty 52 did remember Student 124 as a student, however, and said, "she was a good kid." As Student 124's house master though, she could not recall her having any disciplinary issues.

Witness: Student 127

We interviewed Student 127 on December 27, 2017 regarding his knowledge, if any, of Student 124's meetings with Administrator 9 in the SPS Chapel. During our telephone interview, he told us that Student 124 once worked for him. While working together, according to him, Student 124 reminded him that she had appeared before the Disciplinary Committee at SPS as a student. Student 127, who sat on the Disciplinary Committee at the time, said he had no recollection of it. He said, "I didn't doubt her ... I just didn't remember it." Student 127 recalled the Disciplinary Committee being "busy" at the time, and said that a lot of students appeared before it. As a student member of the Disciplinary Committee, he did not take any handwritten notes. He said, "that wouldn't have been the responsibility of a student," but added, "I can't say for sure that no faculty member took notes."

Student 127 recalled having conversations with Administrator 9, a man he described as having "impeccable moral probity," about his philosophy on disciplining students at the time. He said, "[Administrator 9's] philosophy was to give students lots of second chances ... he would say that as long as the student's motive isn't a cry for help or to cause harm to someone else that they should be given more chances." Student 127 was a sixth form student at the time, and given their difference in age, he said that he was not friends with Student 124. He told us that he was "surprised" by Student 124's experience with Administrator 9. According to him, Administrator 9 was not "a man of the cloth," and therefore would likely not have met a student in the Chapel. He said, "I wouldn't doubt the facts of what [Student 124] said, but I would be careful about how she characterizes them."

Witness: Student 125

We interviewed Student 125 on January 5, 2018 regarding her knowledge, if any, of Student 124's meetings with Administrator 9 in the SPS Chapel. Student 125, who said she knew Student 124 "well" as a student, told us that she did not recall her ever meeting with Administrator 9 in the Chapel. She said, "I don't remember seeing her with him in the Chapel either." She also could not recall Student 124 having any disciplinary issues at the time, but said, however, that she did herself. She told us that she was once "suspended indefinitely" as a student, and was required to write a letter explaining why she should be allowed to return to SPS. She said, "I was scared to death of [Administrator 9]," and added, "he didn't think highly of me."

Student 125 was not surprised to hear about Student 124's allegations against Administrator 9, and although she called them "unusual," she said, "[Administrator 9] showed he had a temper when I got in trouble." She recalled once meeting with Administrator 9 in his office, and said, "he pulled his chair close to me and said 'you are the scum on the bottom most of the barrel.'" Student 125 called Administrator 9's statement to her "powerful words," and said she has shared that story with others many times over the years. According to her, however, others are mostly surprised when she tells it. In her mind, Administrator 9 was overall "very business-like." She said, "he wasn't a truly warm person."

Our review of Student 125's SPS student file confirmed that she was disciplined as a student.

Witness: Student 126

We interviewed Student 126 on January 8, 2018 regarding her knowledge, if any, of Student 124's meetings with Administrator 9 in the SPS Chapel. Student 126, who told us she knew Student 124 as a student, said, "I don't remember her telling me about this ... but I have no reason to doubt her." She added, "but I also believe I would remember her telling me about this."

Student 126 and Student 124 were roommates at the time, and while she admitted to having "a terrible memory," she said she could not remember Student 124 having any disciplinary issues that year. She told us that Student 124 contacted her to give her a "heads up" regarding our investigation and interest in interviewing her. While Student 126 said that Student 124 did not discuss her allegations against Administrator 9 in detail with her, she said, "I think it's one of those things where she didn't realize at the time that it was wrong." According to Student 126, she told Student 124 that she did not remember knowing about her alleged experience with Administrator 9 at the time, but also said, "I was sympathetic and supportive of her." She added, "I honestly believe her ... but I can't say that she told me about it for sure."

Student 126 also told us that as a student at SPS she was once "suspended indefinitely." According to her, Administrator 9 required her to write him a letter "detailing [her] apology." She did, and then during the summer Administrator 9 asked Student 126 to meet with him. She told us her mother drove her to meet with him. According to her, Administrator 9 was "not happy" with her letter. She said, "he didn't feel that it was apologetic enough." While she told us that she never "felt scared or anything," she did indicate that Administrator 9 "raised his voice" and "yell[ed]" at her. She also said that it was typical for Administrator 9 to "verbally lose his temper."

Our review of Student 126's SPS student file confirmed that she was disciplined as a student. Her file also included Groupmaster's Reports which confirmed that she was roommates with Student 124. The Reports recognized Student 126 for being supportive of Student 124.

Witness: Student 129

We interviewed Student 129 on February 16, 2018 regarding his knowledge, if any, of Student 124's meetings with Administrator 9 in the SPS Chapel. Student 129, who said he and Student 124 were "best friends" at SPS, recalled her getting into trouble at the time for "an alcohol incident," and said, "I remember [Administrator 9] might have been hard on her about it at the time ... but I don't know about them meeting in a closet in the Chapel."

Student 129 referred to Administrator 9 as a "weird dude ... really weird," and said, "he was harsh." He recalled deciding to quit football as a student, and described Administrator 9 as being "tough" on him for it. He said, "[Administrator 9] really shook me up and got me on the right track by yelling at me." He recalled "goofing off" in class prior to that, and said that, like Student 124, he was the type to "break the rules and get in trouble." Administrator 9 was "a tough guy," according to Student 129, and Student 124's allegations that he screamed at her did not surprise him at all. He also told us that Student 124 "is not the type to make something up," which is why he believes her, though he did acknowledge that "she could exaggerate." Student 129 said, "the screaming part definitely," but added, "meet[ing] in a small closet ... maybe ... I don't know." In his mind, Administrator 9 was "not wrong" to discipline students in the manner he did. He said, "I look back on it and I think he rattled my cage ... yes ... but I did better afterward, and was better off in the long run for it."

Victim Account 1: Student 124

After interviewing most of the individuals that Student 124 indicated may have knowledge about her experiences as a student with Administrator 9 in the SPS Chapel, we conducted a follow-up telephone interview with her on February 9, 2018. We explained to her that each of the individuals we interviewed remembered her fondly, and that most of them did not doubt her allegations, but none of them had a contemporaneous recollection of the incidents she reported. Student 124 said, "I'm not super surprised to hear this."

In her mind, she viewed her experience with Administrator 9 as an "awful event" that everyone must have known about at the time. She said, "as a teenager when you experience something like this, you think that everyone else must know about it," but added, "as an adult though I now realize that it probably didn't affect them the same way, so they don't remember it ... it was probably just another day for them ... I shouldn't expect them to remember something that happened to me." For Student 124, the fact that no one remembers her experience means that it was "just another day for them," but for her "it was devastating." She was particularly heartbroken to learn that Faculty 52 did not recall her reporting that Administrator 9 was

“screaming terrible things” at her. She said, “I have always remembered the look on her face when I told her ... I know she wouldn't remember the other details ... I never told her about his [body] pressing against me ... but I remember the look she gave me when I told her that he was screaming at me.” She added, “I can't believe she doesn't remember.”

Student 124 expressed concern about her allegations being “thrown out and disregarded,” because the individuals we interviewed could not corroborate them. She said, “I don't want my incident and my letter ... to be cast aside,” and added, “I have so much hurt inside of me ... I'm still in that closet as a fourteen year-old girl.”

III. CONCLUSION

This Second Supplement to our Final Report sets forth our findings and conclusions about allegations of historical faculty-student sexual misconduct at SPS, based on our independent investigation from November 1, 2017 to now. As such, since May 2016, during the course of our engagement, we have interviewed one hundred twenty-one (121) alumni/ae, fifteen (15) former faculty and staff members, and four (4) current faculty members. In total, combining all three of our reports, we attempted to or did contact one hundred ninety-two (192) individuals, and interviewed sixty-seven (67) victims and fifty-one (51) witnesses. The allegations of sexual misconduct we investigated spanned a period of six decades, from 1948 to 2008.

As with the preceding two reports, this Second Supplement is based on information we have received and/or documents we have reviewed to date. We do have additional requests for interviews still outstanding. As with our prior two reports, it is possible that, in the event of further reporting to the SPS community by the interim Rector or otherwise, additional alumni/ae, former or current faculty and staff, or others may come forward with additional information or allegations. We will gladly be available to speak with anyone should they choose to come forward. We will also be glad to respond to any questions the current leadership of SPS may have or information they may wish to have clarified.

Based on our experience in conducting this independent investigation, and our experience with similar investigations done by us and others, the willingness of the SPS leadership to make public the investigative reports and to identify publicly those faculty members whose conduct was deemed by them to be sufficiently substantiated, merits our continued commendation. So we again commend the interim Rector and SPS leadership for their willingness to continue to investigate and report on this historical aspect of the School, and for their full cooperation and commitment to this investigation. As noted in our findings, several individuals who came forward after May 22, 2017 and November 1, 2017 did so because of SPS's decision to publicly release our reports. That decision helped many alumni/ae who were victims or witnesses to recognize that they were not alone.

And that, of course, is the most important take away from this comprehensive investigation undertaken by SPS: the victims that had the courage to come forward were validated and credited. To quote just one excerpt from one of the many letters copied to us and sent to former Rector Michael G. Hirschfeld and Board President Archibald Cox, Jr.:

“I am relieved now, 15 years later, that the truth of these histories has finally been revealed. I will be forever grateful to the alumni/ae who did not turn their backs ... and (brought) these injuries to light for the good of the School. I am grateful that Scott Harshbarger and his team were honest and thorough. I am grateful that you and the chairman had the courage to follow the truth and publicly release this report ... the Investigation Report is a necessary and long overdue first step towards daylight ...”

Therefore, we cannot fail to once again commend the alumni/ae who have been willing to revisit the experiences they have shared with us, despite how painful they may have been, in the interest of ensuring that the historical record is clear, but, also, so that the lessons to be learned will protect and enhance the health and safety of those who entrust their educational and social lives to SPS, an institution that most of those we spoke with continue to respect and value as a critically important part of their life.

We appreciate the opportunity to conduct this independent investigation for SPS.

Respectfully submitted by,

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