

THE PARK SCHOOL OF BUFFALO

**REPORT OF INDEPENDENT INVESTIGATION
OF HISTORICAL REPORTED INCIDENTS
OF ABUSE AND INAPPROPRIATE BEHAVIOR**

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WARNING: This report contains explicit content and is not appropriate for those under the age of eighteen.

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INTRODUCTION

In mid-2017 and early 2018, two alumni—Andrew Clarkson and Andrea Van Liew—contacted The Park School of Buffalo (“Park”) to report incidents of inappropriate faculty behavior they experienced during their time at the school in the 1970s. In speaking with Van Liew and Clarkson, Park’s administration quickly realized how profoundly the reported violations of trust affected these two former students. Within the same timeframe, Park was contacted by an investigator for a private school in Massachusetts, as well as an attorney working on an investigation at the Nichols School of Buffalo, both of whom indicated they had received reports of inappropriate behavior by former Park employees.

Chris Lauricella, Park’s Head of School when these incidents were reported, notified the school’s Board of Trustees of these reports. The Board determined that these historical reported incidents should be investigated, memorialized, and shared with the community, with a goal of understanding the past and preventing any such incidents from happening again. The Board retained outside legal counsel to conduct an independent investigation and appointed a Board committee tasked with facilitating the investigation (the “Committee”).¹ Committee members included: Chris Lauricella (outgoing Head of School), Jeremy Besch (incoming Head of School), Martin Berardi (outgoing Board President), David Brock (incoming Board President), and Marianne Roche (Trustee).²

¹ The investigation itself was conducted entirely by Hodgson Russ LLP. The Committee’s role was to assist where needed in obtaining contact information, assess the evidence presented, and assist the current administration to meaningfully evaluate the issues identified herein.

² During the investigation, Chris Lauricella left the Committee at the conclusion of the 2017-2018 school year to take a position at another institution (a position he had accepted before this investigation had begun), and Marianne Roche left the Committee in the fall of 2018 for reasons unrelated to this

On April 27, 2018, the Committee, on behalf of Park, distributed a letter to all alumni outlining the initial allegations, acknowledging the profound impact these reported experiences had on some alumni, and inviting anyone wishing to share any other information regarding educator misconduct to contact attorney Julia Hilliker as part of the independent investigation.

Over the following seven months, thirty individuals (hereinafter “reporters”) initiated conversations with Ms. Hilliker about historical incidents reported to have occurred at Park. Most reporters shared their own stories. Some shared observations relating to other students, and others recounted rumors. The majority of reporters elected to share their stories, but some made an initial contact and then elected to go no further. Some shared their stories but specifically requested those stories not be included in this report.³

The reports spanned the period from the late 1950s to the 2000s, although, with one exception, all of the alleged conduct reported occurred more than 20 years ago. The overwhelming majority of the reports related to conduct that occurred between 1960 and 1990. Reported conduct ranged from inappropriate, but nonsexual, verbal exchanges with teachers to entirely inappropriate relationships, some of which were sexual in nature. Two reporters

investigation. At present Jeremy Besch is the Current Head of School, David Brock is the Current Board President, and Martin Berardi is the Immediate Past Board President.

³ Those stories were considered, however, to the extent they corroborated other incidents or were insightful into how the school handled these matters.

conveyed inappropriate behavior by other Park students.⁴ None of the reports involved allegations of misconduct by a current employee or administrator.

Of thirty reporters, twenty-eight were former students, one was a parent of former students, and one was a former faculty member. The reporters generally provided personal accounts of alleged educator misconduct, but several also identified other former students who likely were victims of inappropriate faculty or staff behavior. Out of respect for those former students, and recognizing that individuals cope in different ways, no attempt was made to contact any of them. Rather, only if a former student initiated contact were follow-up questions asked.⁵

Based on the initial reports, an investigation was conducted. This included a review of student files, personnel files, and interviews with former faculty. Interviews with former faculty were limited as many are deceased, and others declined to participate.⁶ The review of personnel files was largely completed, although some were not available. The review of the available student files was limited, given Park's practice of reducing student files to essential documents only (*e.g.*, transcripts) in the process of archiving those files. In some instances, allegations were corroborated by other reporters. In other instances, the reporters submitted documents that they believed substantiated their claims.

⁴ These reports are contained herein; however, the students against whom the misconduct was alleged are not named in this report, in part, because they were minors for all or part of timeframe in which the conduct was alleged.

⁵ Based on the information received and understanding the myriad of reasons that former students may not wish to come forward, it is possible that this report will underreport the total number of alleged incidents.

⁶ As former employees, individuals were free to decide whether or not to participate. To encourage participation, former employees were permitted an opportunity to remain anonymous if they wished.

Reporters were given the option whether the particulars of their experience would be included in this report. For those who wanted to share their stories, some elected to also share their names and others preferred to remain anonymous. Reporters are identified by name only with their permission. Where a reporter requested anonymity, identifying details were purposefully omitted from this report. It took tremendous courage for the reporters to share their past experiences. In reading this report, please respect the privacy of those who came forward. More specifically, please respect the wishes of those who chose to remain anonymous, and use appropriate discretion with those who shared their names.

INCIDENTS

The below is an account of credible allegations reported during the investigation.⁷ While all of the allegations below are credible, careful consideration was given as to when it was appropriate to name a faculty member. In reaching that decision, we attempted to balance the weight of the existing evidence, the benefits to the victims and the school community, the credibility of certain individuals, and the potential harm in naming individuals for which there were credible allegations but little or no additional supporting evidence.

⁷ Reports of other educator misconduct, some sexual in nature and some not, also were received but are not included herein. In large part, those reports were based solely on secondhand rumors. While we do not discount those rumors, in the absence of corroborating evidence—such as someone with personal knowledge coming forward or documentation relating to the issue—those rumors were not included in this report. However, we will continue to accept reports from individuals who, upon reading this report’s findings, determine they have firsthand knowledge and choose to come forward.

A. Specific Faculty Members

1. Leonard (Tom) D. Adkins Jr.⁸

Leonard D. Adkins was employed as a high school English teacher at Park from approximately 1973 to 1986.⁹ Though Leonard was his given first name, he went by Tom. There were two reporters with firsthand allegations of inappropriate sexual behavior by Adkins. In addition, there were two reporters who said they were aware of inappropriate advances toward male students by Adkins, and two reporters who stated that as students, they heard rumors that Adkins had inappropriate relationships with male students.¹⁰

In an interview with Adkins, he expressly denied that any inappropriate conduct occurred at his summer home in Vermont. When asked directly about relationships with specific students, he stated that he had no comment.

(a) *Andrew Clarkson*

Andrew Clarkson graduated from Park in 1977. Adkins was his English teacher for his sophomore and junior years. The following is a recitation of the alleged misconduct Andrew shared.

⁸ Adkins agreed to an interview. His responses to these allegations are included herein.

⁹ As discussed above, not all historical personnel files could be located. Some of the descriptions of years and educator roles discussed herein were taken from multiple sources such as yearbooks, historical files, and anecdotal sources. It is therefore possible that the descriptions may inadvertently omit a position held by an individual or the date of such position.

¹⁰ Lastly, one reporter, Lisa Watt, indicated that during her senior year in 1974, Adkins often appeared to be inebriated and would slur his words during class. Andrea Van Liew stated that during her time at Park in the late 1970s, Adkins was an alcoholic. Others who called about Adkins did not comment on this issue.

At the conclusion of his junior year, Andrew was elected president of the Student Council. Adkins approached Andrew and invited him to dinner to discuss school politics. That dinner ultimately turned into monthly dinners early in Andrew's senior year. The discussion shifted from school politics to Andrew's social life, including questions about Andrew's relationship with his girlfriend. Adkins eventually invited Andrew to his apartment on campus after dinner, where Adkins would request that Andrew ask him questions. Adkins confided in Andrew that he was homosexual and asked Andrew to keep that information confidential for fear he might be fired. Adkins also shared that he had relationships with male students during his prior employment at another school, the name of which Andrew does not recall. Adkins never stated whether those relationships were sexual in nature. The sharing of such personal information by Adkins made Andrew feel as though Adkins really trusted him.

One evening, while discussing Andrew's then girlfriend at Adkins' apartment, Adkins offered to put on a pornographic film to help educate Andrew. Andrew initially hesitated, but after further pressure from Adkins, agreed to view it. Adkins put on a film featuring naked women. He asked Andrew at the end of the film if he could measure Andrew's erection. Andrew said no, but Adkins persisted. Andrew continued to say no and left. After that, their relationship changed. Adkins no longer invited him to dinner. Aside from seeing him in class, they had no further contact.

While a student, Andrew told only his girlfriend about the incident. He did not report his encounter with Adkins to his parents or anyone at Park. In the mid-1980s, Andrew realized for the first time how inappropriate Adkins' behavior was, and Andrew realized Adkins likely engaged in this behavior with other students. Thinking back, Andrew recalled two specific

male students who went to dinners with Adkins and spent a summer living with Adkins at his home in Vermont. Likewise, he recalled other male students who were close with Adkins. That realization prompted Andrew to report the matter to one of Park's administrators at that time, though he cannot recall who that individual was. Andrew does recall the administrator telling him that prior to him coming forward, no student had reported any issues with Adkins, and further, that Adkins would be quietly dismissed. Records indicate that Adkins resigned from his position in May of 1985, effective June of 1986. As of the date of this report, we were unable to identify an administrator who recalls a conversation with Andrew.

Adkins stated that he did not recall Andrew as a student and therefore could not recall any specific conduct relating to him.

(b) Student 1

The second reporter who said he had firsthand allegations of Adkins' advances wishes to remain anonymous and, therefore, will be referred to as Student 1. Student 1 is a male who attended Park in the late 1970s and early 1980s. Below are the accusations as stated by Student 1.

During his junior year, Adkins was Student 1's teacher and advisor. They formed a trusted relationship, and Adkins would also counsel him about personal matters. At the end of his junior year, Adkins invited him to dinner off campus. After dinner and back at campus, Adkins told Student 1 that he had a special book club reserved only for his favorite students and invited Student 1 to join. Student 1 was then invited into Adkins' on-campus apartment to hear more about the book club. Once inside, Adkins showed him two or three individual photos of

other male students, who Adkins said were members of the special book club.¹¹ Each student was nude in the photograph. Student 1 was also shown other photographs of penises with rulers next to them. Adkins told Student 1 that a condition for being in the club was having the length of his aroused penis measured. Adkins then began to arouse Student 1 using both manual and oral stimulation, but in the process, Student 1 pushed him off and left. Student 1 had not told anyone about the incident until recently.

As indicated above, Adkins stated he had no comment regarding specific students.

(c) *Anonymous Reporter regarding Students 2 and 3*

A female reporter recounted a relationship between her brother (Student 2) and Adkins. Student 2 was a high school student at Park in the 1970s. Below are the accusations as detailed by this anonymous reporter.

Adkins was known for inviting some students to spend the summer working for him at his home in Vermont. Her brother, Student 2, along with another male student, Student 3, worked for Adkins at his home in Vermont one summer. Upon Student 2's return from Vermont, their mother began to ask Student 2 and his sister questions about Adkins. Being curious, the sister reached out to Student 3 and asked what transpired that summer. Student 3 told her that Adkins bought them beer, showed them inappropriate movies, and would fondle them. Student 3 confided in her that he eventually told Adkins he did not want to engage in that behavior any more, and upon doing so, Adkins stopped. She never told anyone about this at the time and never discussed it directly with her brother. Many years later, she had discussions with

¹¹ Student 1 recalls that he recognized another student in one of the photographs.

other former Park students who told her that they were aware of Adkins' relationship with her brother, among others. Of significance, Students 2 and 3 are the same individuals that another reporter identified as attending dinners with Adkins and as spending the summer in Vermont with him.

As indicated above, Adkins denies any inappropriate conduct occurred during the summers spent in Vermont and had no comment about specific students.

(d) Student 4

Student 4's sister reported that her brother spent a summer at Adkins' home in Vermont during his high school years at Park. She said that, at the time, Student 4 told her that he would play naked croquet with Adkins. She added that Student 4 told her that Adkins never made any advances toward him, but that he did exchange naked photos of himself with Adkins. She was unaware whether anything further transpired.

Again, Adkins denied any inappropriate conduct occurring at his home in Vermont.

2. Thomas J. Bailey¹²

Thomas Bailey's career at Park spanned from 1973 and 2006. He was primarily a History teacher. During the mid-to-late 1980s, he also served as the Assistant Head of School. In addition, for many years, Bailey directed the school's theater group. Two female reporters relayed firsthand accounts of alleged sexual harassment by Bailey. A third reporter stated that Bailey's conduct, as perceived by her, gave male students implicit permission to behave

¹² Bailey is deceased.

inappropriately. A former teacher at Park reported a relationship between Bailey and another female student.

(a) *Tara Lebel*

Tara Label began her time at Park in the seventh grade and graduated in 1983.

The narrative below reflects Tara's account of what transpired.

During her high school years, Bailey was her history teacher, guidance counselor, and the theater director. Tara's parents were undergoing a divorce and she went to Bailey often for personal guidance. During these interactions, Bailey began making inappropriate comments and ultimately touched her inappropriately.

Bailey would invite Tara to sit on his lap. He would pull her up against him and put his head on her chest. Bailey frequently told Tara that she had a nice body. One time, in front of the entire class, he told her: "If the class were stranded on an island, I would make sure you survive, because you would be mine for procreating purposes." On another occasion, after she was upset about a theater performance, he got on his knees and hugged her tight with his head on her stomach. Two other male students saw this, but as far as she knows, they did not say anything.

During the summer months, Bailey stayed at Camp Weona with his family. Tara was invited to stay with them for a week one summer. Just before bed one evening, he kissed her on the forehead goodnight. The following morning, he came into her room, stroked her hair, and pulled down her covers. She quickly grabbed the covers and told him that she did not have anything on. He said he did not care and continued to pull the covers down and began stroking

her body. In that moment, she froze. Once Bailey left her room, she immediately left his cabin and went to stay in another friend's cabin. Later that evening she told Gwen Hare, another Park student who was also attending Camp Weona, about what had transpired. Gwen recalls Tara confiding in her at that time about Bailey being inappropriate with her and that Tara was desperate to be out of Bailey's cabin. Aside from discussing it with Gwen, Tara did not report Bailey's advances to any teachers or administrators at Park while a student.

In December of 1983, during Tara's freshman year of college, Bailey sent her a letter indicating he would like to visit her in Boston. The letter notes, "you are the center of my confused wishful dreams." Tara provided a copy of that letter as well as other correspondence between the two. In 1997, that same letter was provided by Tara to the Head of School,¹³ Donald Graff. Tara's submission to Graff also included a chastising letter from her mother to Bailey, dated September of 1997. Bailey's employment file contains copies of these letters. Also contained within the employment file is a letter from Bailey to Graff, dated January 23, 1998, in which Bailey denied Tara's allegations. It appears that Graff then consulted an attorney. Thereafter, on May 12, 1998, Graff sent a letter to Bailey indicating that no disciplinary action would be taken as a result of Tara's allegations. Thereafter, Tara occasionally sent notes to Park about the sexual harassment she endured from Bailey, but there is no evidence that the administration took any action.

¹³ Historically, this position was also referred to as Head Master. For consistency purposes, this report uses the term Head of School.

Don Graff agreed to an interview. He noted that at that time he did what he thought was best. He stated that he believes he handled the matter with care and prudence.

In 2013, Tara shared her story with then Head of School Chris Lauricella at a reunion event. Lauricella discussed the matter with Tara, and in consideration of her concerns and after speaking with other alumni, Lauricella removed a memorial that had been set up in Bailey's honor. When Park decided to undertake this investigation, Lauricella reached out to Tara. She requested her report be included in this investigation.

(b) Student 5

A student who graduated in the late 1990s reported that Bailey's inappropriate conduct first occurred when she was in middle school and escalated during her high school years. She wishes to remain anonymous and will be Student 5 for purposes of this report. The below is her recollection of interactions with Bailey.

When Student 5 was in middle school, a senior boy began stalking her on campus. Student 5 went to Bailey and confided in him about the situation, hoping for assistance. Instead, Bailey encouraged the senior male student's behavior. In fact, on class day that year, Bailey read a poem about the graduating senior in which he made several jokes about how that graduating student stalked Student 5.¹⁴

While in high school, Student 5 was a student of Bailey's and reported to his homeroom. Bailey continually made comments to Student 5 about her relationship with her

¹⁴ Another reporter, who called primarily in relation to another faculty member, shared a similar account of being stalked by an older student. That account is included in Section C(4), p. 38, under Anonymous Male Student 2.

boyfriend. He would say he enjoyed watching her kiss her boyfriend. Bailey would also comment about the size of her breasts and at times would grab her shoulders and turn her in such a way that her breasts would be facing him.

One classmate of Student 5 called solely to report that she witnessed Bailey's ongoing harassment of Student 5. For example, Bailey would make inappropriate jokes both to Student 5 directly and to the entire class about the size of Student 5's chest. Bailey would also tell sexual jokes at Student 5's expense and would taunt her by inquiring about her romantic relationship with her boyfriend. Another reporter, also a classmate of Student 5, indicated that she too witnessed Bailey make inappropriate comments about Student 5's looks as well as her chest. That reporter noted that it was confusing for students, as Bailey was a highly beloved teacher, and yet, at times, his actions were obviously inappropriate.

(c) *Student 6*

Student 6 was not among the reporters; however, there were multiple other reporters who discussed Student 6's alleged relationship with Bailey. Several reporters indicated that they witnessed an inappropriately close relationship between them. A former faculty member stated that Bailey put his arm around Student 6 and that it was uncomfortable to watch the way he interacted with Student 6. No one indicated, however, that anyone ever notified administration of any inappropriate relationship between Student 6 and Bailey.

3. E. Webster Dann¹⁵

Web Dann was employed at Park from 1971 to 1977. During that time, he was a math teacher, worked in admissions, and coached.¹⁶ Three reporters shared firsthand experiences of alleged inappropriate conduct by Dann. Each of the reporters wishes to remain anonymous.

(a) *Student 7*

Student 7 is a male student who attended Park during Dann's tenure there. Though Dann was a teacher at Park, Student 7's interactions with Dann were largely the result of a personal relationship between his family and Dann. In addition, Dann coached hockey through Park and was Student 7's coach. Student 7 alleges as follows.

Dann often would invite children, including Student 7, to stay at his house overnight with the explanation it was helpful to their parents. During his adolescent years, Student 7 stayed the night at Dann's house on multiple occasions. Dann would shower, fully naked, with Student 7. On occasion, when Student 7 would get out of the shower, a Playboy magazine would be lying next to the bed. Dann often slept in the same bed as Student 7. At the time, Student 7 did not think the behavior was odd and did not say anything to anyone.

Following these incidents, but still during his adolescent years, Student 7 moved away to a boarding school. During Student 7's time at that school, he heard from others that Dann had once taught there, but had been asked to leave for allegedly inappropriately touching

¹⁵ Dann is deceased. During his time at Park, he went by Web Dann.

¹⁶ Web Dann was also a teacher at the Nichols School. His conduct there is covered in a report released by Nichols in January 2018.

male students. Student 7 reported what he had learned to his family, but did not report it to Park. In retrospect, Student 7 believes Dann was grooming¹⁷ male students at Park.

(b) Student 8

Another male student at Park, Student 8, reported that in his early teens Dann befriended both him and his mother. What follows is the report as shared by Student 8.

Dann would offer to take Student 8 to recreational activities unrelated to Park. He often had Student 8 stay the night at his house and would take him for overnight visits at a cottage in Canada. During these overnight visits, Dann would ask Student 8 to take a bath with him. Student 8 always declined and would shower. Dann would stand next to the shower and help wash Student 8's back. Dann would also request to sleep in the same sleeping bag as Student 8. At bedtime, Dann would lay next to Student 8, place his hand under his clothes, and rub Student 8's belly and chest. Student 8 would always become uncomfortable. Realizing that Dann's hand was headed downward, Student 8 would find a way to say it tickled or otherwise stop the behavior. In retrospect, Student 8 realizes now that Dann was systematic in creating opportunities for nudity, including skinny dipping, offering to towel dry him, changing clothes, offering to bathe him, and sleeping naked.

At the time, Student 8 did not appreciate the gravity of Dann's actions. He never told his parents or anyone at Park about Dann's inappropriate conduct.

¹⁷ Grooming in this context means to befriend and establish an emotional connection with a child, and sometimes the family, to lower the child's inhibitions with the objective of sexual abuse.

(c) *Student 9*

Student 9 is a female who attended Park. She relayed the following allegations about Dann. In addition to being a teacher at Park, Dann befriended her family. During her fourth-grade year, Dann invited her to stay overnight at his home. At the time, she thought it was a special treat to be able to stay there. During the overnight visit, Dann told her it was time to shower. He then proceeded to shower with her, both naked. Student 9 perceived the experience as odd at the time, but does not recall saying anything to her parents or to anyone at Park. Thereafter, she never stayed the night at his house again.

During adulthood, Student 9 realized how wrong Dann's conduct was. In retrospect, she believes he was grooming many of the adolescent students by bringing them treats and inviting them to his house outside of school. As a condition of sharing her story, Student 9 made clear that she does not perceive any fault on behalf of Park. Rather, most of her contact with Dann was a result of her family's friendship with him.

4. Omar Dewitt¹⁸

Omar Dewitt was employed at Park as math teacher in the late 1960s and early 1970s.

(a) *Lisa Watt*

Lisa Watt graduated from Park in 1974. Dewitt taught math and Lisa stated that she endured verbal abuse in his classroom. In general, she said Dewitt would pick out certain students, including her, and humiliate them in front of the class. According to Lisa, on numerous

¹⁸ Dewitt agreed to an interview.

occasions, he singled out her and would have the whole class laughing at her. She said the verbal abuse was so severe that she would frequently go to the pond and sob after class. She never told her parents or anyone at Park about his behavior.

Dewitt did not recall Lisa as a student, but denied having ever engaged in such behavior as it would not have been reflective of his typical teaching style. Dewitt elected to leave Park for other opportunities at the conclusion of the 1975 school year.

5. Michael Dugan¹⁹

Michael Dugan was a physical education teacher at Park from the 1970s until 2007. One female reporter—who described her experience as detailed below—relayed a firsthand account of Dugan’s alleged inappropriate conduct.

(a) *Jenna Carr*

Jenna attended Park from 1992 to 1995. The following is a recitation of the allegations as shared by her.

During her sophomore year, Jenna signed up for volleyball, but then unexpectedly had to take a month leave. During that leave, she was hospitalized for a depressive episode. Upon returning to school, she decided to withdraw from volleyball. Jenna was told she needed to see Dugan to withdraw. Other students and teachers warned her that Dugan was intimidating. Jenna and a friend went to see Dugan at his office, which consisted of a desk in the boy’s locker

¹⁹ Dugan agreed to an interview. He recalls the allegations being made. The then Upper School Dean of Students, Eric Kornve, came to question him about the allegations and he denied them. He told Kornve that it was ridiculous and never happened. Thereafter, he heard nothing further about the incident. Dugan continues to deny the allegations.

room. When they arrived, several male students were there getting ready for practice. Jenna explained to Dugan that she had been in the hospital and that she wished to withdraw from volleyball. Dugan leaned back in his chair, spread his legs, and began to subtly fondle himself. He proceeded to be rude in discussing the situation with her. Jenna left the office very upset.

The next day Jenna and her friend went to see teacher Elise Donaldson,²⁰ in part because they believed she had had prior run-ins with Dugan. Donaldson recalls the girls being very upset and took them to the Upper School Dean of Students, Erik Korvne,²¹ where they then explained the situation to him.

Jenna was told that administration then interviewed Dugan, as well as the boys who had been present in the locker room at the time. Jenna recalls being told the male students denied seeing anything. Jenna believes they did so because they were intimidated by Dugan and thought that speaking up could lead to repercussions in their playing time. Jenna was then told by Don Graff,²² the Head of School, that she should stay away from Dugan and not talk about the situation with anyone else. One other reporter stated that, at the time of this incident, Jenna told her what happened, and said that she had been instructed to keep her mouth shut.

Thereafter, Jenna felt awkward and uncomfortable at school. She felt as though she was viewed by other staff and students as a troublemaker. In 2011, Jenna was speaking with a friend who attended Park around the same time. That friend informed her that at the time this

²⁰ Donaldson agreed to an interview and confirmed that Jenna reported the incident to her at that time and that she took Jenna to see Erik Korvne to report the incident. Donaldson reports that Korvne said he would handle it from there. She had no further involvement in the matter.

²¹ Korvne recalls the allegations and handled them as described herein.

²² Graff agreed to an interview. He denies knowing about the incident or having said anything to Jenna.

incident with Dugan occurred, a Board member had inappropriately disclosed Jenna's mental health issues to some male students and instructed them to keep their distance from her.

Korvne agreed to an interview. He recalls Donaldson bringing Jenna to see him with the allegations as she describes, except he does not recall there being any male student witnesses. Korvne indicated that he took Jenna's report seriously and went to see Dugan. At that time, Dugan told him that Jenna and another student²³ came to see him and that he "stared them down," because he did not believe her reason for wanting to withdraw. Korvne has no recollection of Jenna having any mental health issues or of that being the reason she wanted to withdraw. According to Korvne, Dugan told him that he did lean back in his chair which caused his pants to become too tight on his bent legs and in turn, he touched the thigh of his pants to hike them up. Dugan denied that any gesture of fondling of any kind occurred. Korvne told Dugan that there should be no retribution for the allegations and that this matter would have to be noted in his file. Korvne then went to the Head of School, Don Graff with the matter. Once he took it to Graff, he understood that Graff would handle notating the file and any other final decision on the matter. Korvne believes he handled the matter to the best of his ability at the time.

Don Graff, when interviewed, indicated that he does not recall the incident. He expressly denies having instructed Jenna to keep quiet. Dugan's file does not contain any mention of this incident. Dugan continues to deny the allegations.

²³ Consistent with the decision not to reach out to students identified as potential victims by others, this student was not contacted.

6. Lynn Hebert²⁴

Hebert was employed as a science teacher at Park in the 1960s and 1970s. One former student called to report that he was allegedly drunk during class.

(a) *Lisa Watt*

Lisa Watt, mentioned above,²⁵ reported that Hebert often drank during school hours. According to Lisa, he would appear inebriated during class and beer cans were visible in his trash can. On one occasion, she said that she missed a lecture and Hebert provided her with a recording of the class. She recalls listening to it and hearing him slur his words. She never told her parents or anyone at Park about the issue.

In April of 1976, two years after Lisa's graduation, Gary Williams, then Director of the Upper School, sent a letter to Hebert indicating that "after careful and thoughtful discussion," the school and Hebert were "ready to embark on a new relationship." A copy of this letter is maintained in Hebert's employment file. The letter then went on to list a series of topics that were of concern and would be evaluated as part of the new relationship. One of the enumerated points stated: "[y]our response in our discussion of the personal use of alcohol were particularly encouraging. Nothing could bring more thorough and complete deterioration in performance than an abuse of this habit. Your agreement was of great significance to me. Simply stated, we are interested in maintaining mature adult models for the students to both emulate and react to." There were no further details about the timing of his personal alcohol use. Also in Hebert's personal file was a note dated April of 1978 from Gary Williams to John

²⁴ Hebert is deceased.

²⁵ See, *intra*, p. 16–17.

Karrer,²⁶ alleging that Hebert was inebriated at the time he filled out a faculty survey questionnaire.

Williams did participate in an interview. He did not have any knowledge during his tenure that Hebert drank in class and indicated that he would have taken immediate action if he had known. Although he did not recall the letter and note discussed above—likely due to the passage of time—he would stand by the documents he authored.

7. Michael Jackman²⁷

Michael Jackman was employed at Park in the late 1980s and taught French. A female high school student, hereinafter Student 10, reported that Jackman sexually harassed her during her time at Park.

(a) *Student 10*

Student 10 reported that Jackman would continually write notes on her papers telling her how sexy she was. According to Student 10, one day Jackman came to her very upset and told her that he had been confronted by another employee²⁸ who had found one of the notes from Jackman to Student 10. Shortly thereafter, according to Student 10, an administrator came to her and said she was excelling in French and therefore should no longer attend Jackman's

²⁶ The note contains only first names, however, given the timeframe and first names, it is assumed that that these individuals are the author and addressee.

John G. Karrer was the Head of School at that time. Mr. Karrer is deceased.

²⁷ Jackman denies the allegations.

²⁸ That former employee does not recall seeing a note.

class and should instead tutor the grade below her for the remainder of the year. Student 10 recalls that Jackman was dismissed at the end of the year.

Thereafter, she said Jackman sent her a letter explaining his feelings for her and asking her to meet him at a hotel, which she realized was inappropriate and did not do. Student 10 stated that she showed the letter to a friend, but then threw it out. She also later told her brother about Jackman's letter. The friend confirmed that she saw a letter from Jackman to Student 10 in which he told her how attractive she was and asked her to meet him, though she was unclear on the timing of when she saw the letter.²⁹ Student 10's brother confirmed that during their college years, she confided in him about the letter and Jackman's actions.³⁰ Student 10 never spoke with anyone at Park about Jackman and did not tell her parents about his conduct until sometime during her college years.

Jackman's file contained no mention of Student 10. It did confirm, however, that Jackman was abruptly terminated in the timeframe described by Student 10. Over the objections of many parents, administration stood by the termination. The file indicates that Jackman then initiated legal action against the school related to his termination. Then Head of School, Tom Fulton, declined in writing to provide a letter of recommendation for Jackman because of the legal action.

²⁹ The friend also stated during her interview that Jackman was inappropriate in general with the types of comments he would make to female students about their appearance, including comments he made to her.

³⁰ Her brother also commented that Jackman was lewd in general and was known for making sexualized jokes during his classes.

Jackman agreed to an interview and denied the allegations. Jackman insisted that the allegations were entirely untrue. He recalls writing notes on her tests as he typically did with students, but nothing out of the ordinary. Jackman suggested that perhaps someone else wrote a letter to Student 10 pretending to be him. When asked about his termination, Jackman stated that he was told at the time that it was due to the language he used with the kids and further that he was a gadfly, which was not appreciated. Jackman remained confident that he never engaged in any type of inappropriate behavior toward female students. Jackman did confirm that he recalled consulting an attorney, but did not believe any formal legal action occurred.

8. David Pisaro³¹

David Pisaro taught French at Park in the 1970s. For at least a portion of his time there, Pisaro resided in an on-campus apartment. At some point, he lived in a house adjacent to campus. One reporter, Andrea Van Liew, stated that Pisaro was inappropriate with her. Her report was corroborated. Several other reporters relayed information about other students they believed had been romantically involved with Pisaro—including one account of a student who told the reporter about her alleged romantic relationship with Pisaro when she was in high school.

³¹ Pisaro is deceased.

(a) *Andrea Van Liew*

Andrea Van Liew graduated from Park in 1979. What follows is her description of her experience with Pisaro.

At that time, Pisaro was in his thirties and very charismatic. He lived above the dining hall and subsequently moved off campus to a house adjacent to campus. During her junior year, Pisaro would invite her and other students to his house where he would provide them with beer and smoke cigarettes. On occasion, she would go to visit him alone. During one of those visits, Pisaro kissed her and then forcefully pinned her to the ground. She resisted, told him no, and was able to free herself and exit his apartment. Andrea never visited Pisaro at his home again. After that incident, Andrea recalls that she received a significantly lower grade in French.³²

Pisaro made it known to the students that he was a black belt in karate. He was physically fit. There were rumors among students that Pisaro had done this to other female students. Andrea understood that he physically threatened any male students who were aware of his interactions with female students.

In the spring of 1979, Andrea, along with other students, targeted Pisaro's classroom as part of the senior prank. The prank escalated to vandalism because of her anger toward him. Andrea admitted to John Karrer, Head of School at that time, what she had done and told him that Pisaro had been sexually inappropriate with her. She recounted that he responded to her, "Well, that's understandable because there are so many pretty girls here [at

³² Andrea's file did not contain a complete transcript.

Park].” Andrea felt this was a clear signal that the school administration would do nothing about Pisaro’s behavior.

Later that year, in May or June of 1979, Tom Adkins invited Andrea and two other students out to dinner. Included in that dinner was a female student to whom Andrea believed Pisaro had made inappropriate advances and a male student who had been threatened by Pisaro after he attempted to stand up for the female students. Adkins told Andrea and the other two students that he knew what had happened to them and that it was not okay. Andrea recalls that Pisaro resigned in May or June of that year.

9. Dan A. Rose³³

Dan Rose was employed as a middle school science teacher at Park in the late 1960s. One reporter stated that there were rumors of Rose having inappropriate contact with male students.

(a) *Richard Lavery*

Richard Lavery graduated from Park in 1969. His allegations regarding Rose are as follows.

Each year, Rose took the middle school male students on a trip to Northern Canada. In the fall of 1968, there was a rumor among the students that Rose had molested one of the boys during the trip to Canada. Later that year, during the spring of 1969, Richard finished studying late in the evening and decided to take a walk around campus. Two other students went with him. During the walk, the other two students decided they wanted to visit Rose at his home

³³ Dan Rose did not respond to a request for an interview.

on campus. Richard refused to go inside and waited outside while the other two students went in. When the students emerged from Rose's home, they told Richard that Rose had shown them a movie about African tribes wearing sheaths on their penises and that after the movie, he showed them a statue of an individual wearing the sheath.

In April or May of 1969, an art show was held in the lower part of the assembly building. An artificial wall had been built to display the art. During the art show, Richard saw that someone had written all over the back side of the artificial wall about how Rose was known to molest students. Several parents ducked behind the wall and viewed the writing. Rose disappeared from Park that summer, and Richard surmised that it was a result of the writing from the art show.

While Rose's employment file did not mention the incident, a binder containing historical faculty and staff lists does show Rose as teaching Science from 1968 to 1969. The 1968–1969 Staff and Faculty List contains a handwritten notation next to his name that says "FIRED." We were not able to determine the source or author of the handwritten notation.

10. Doug White³⁴

Doug White was employed Park from 1979 to 1988.³⁵ Initially, he was a middle school teacher and eventually he became the Director of Outdoor Education. One reporter relayed his direct experience, as well as that of another student, with White.

(a) *Bill*³⁶

Bill attended middle school at Park in 1980s and for this report asked that only his first name be used. Bill relayed the following allegations regarding White.

White was known for taking the middle school students on camping trips. White also worked at Camp Weona in the summers and would ask students to attend. Bill did not go to summer camp, but went on other camping trips with White. Bill has memories of White rubbing his stomach as he fell asleep at night and being uncomfortable with the touching. Bill knew the same thing happened to another student, Student 11. During their sixth-grade year, Student 11 called White out at school saying: “I don’t like how you play with us or how you touch us.” Other students were in the area when this occurred. Bill never told anyone at Park about it. Approximately two years ago, Bill told his parents for the first time.

Many years after the incidents discussed above, Bill and Student 11 discovered that White had been arrested for child pornography. They exchanged correspondence on the subject. Court documents confirm that in 1989, after having left Park, Doug White was indicted

³⁴ White is now deceased.

³⁵ White’s file indicates that his contract was not renewed for the 1988-1989 school year as his position was eliminated due to declining enrollment.

³⁶ Bill agreed to share his first name only.

for possessing photographs of nude or partially nude boys. White admitted to having had this problem for twenty years. White plead guilty in 1992 to a violation of 18 U.S.C. § 2252(a) for receiving photographs in interstate commerce of minors engaged in sexually explicit conduct. White was sentenced to a six-month imprisonment, to be served at a halfway house, followed by two years of supervised release. In addition, his sentence included occupational restrictions and a \$2,000 fine.

11. Peter Williamson³⁷

Peter Williamson was employed at Park from 1973 to 1977 as a teacher of history and social science in the Upper School. Two reporters stated that they experienced incidents of misconduct involving Williamson.

(a) *Whitney Hoyt*

Whitney Hoyt attended Park beginning in preschool and continuing through the conclusion of her sophomore year. Whitney's account of her interactions with Williamson—and related allegations—are detailed below.

Whitney's mother was on the Board at Park and befriended Williamson. As such, Williamson would sometimes join them for dinner at their home or other events outside of school. Whitney's first experience with Williamson as a teacher was in the eighth grade. She described Williamson as casual about boundaries. Students would go to Williamson's house to hang out or work on projects. He would drink and smoke with students, including Whitney, outside of school. During either her eighth or ninth grade year, Williamson gave Whitney a ride

³⁷ Peter Williamson is no longer teaching.

home and put his hand around her shoulder. Slowly, he let his hand drift downward and touched her breast. She reacted negatively and he instantly apologized, saying that it was an accident. A week later, he again drove her home. During that drive, he put his hand on her knee and then slid it up her leg to the point of touching her genital area. After that, Williamson took advantage of other opportunities to inappropriately touch Whitney.

The situation escalated one weekend when she was hanging out at Williamson's home. They were drinking and smoking together when Williamson kissed her and began to feel her up. Whitney felt paralyzed and did not know what to do. He pushed her over and climbed on top of her, continuing to inappropriately touch her, but refraining from actual intercourse. This happened at least three to four other times.

By her sophomore year, Whitney began getting into trouble. Her parents decided that she should attend a boarding school for the remainder of her high school education. After that, she never saw Williamson again. Whitney never told anyone at Park about Williamson's misconduct. Whitney does not believe that her parents had any knowledge about what transpired between her and Williamson. In 1985, Whitney shared what had happened with her parents, and they seemed genuinely surprised.

(b) Student 12

Student 12 is a male who attended Park in the late 1970s. He shared the following characterizations about Park's culture and Williamson. Overall, he characterized Park as having a lax attitude about drugs, alcohol, and "relations." He also believes, however, that it was partly due to overall societal norms at the time. For example, Student 12 perceived that it was well known that students would go to the pond to smoke pot during the school day.

Student 12 stated that Williamson had an RV near campus, where he would host parties. Williamson supplied alcohol and pot. Student 12 stated that he heard about several of these events and went to one such event himself. Williamson, according to Student 12, frequently attended other parties with students off campus.

12. Matthew Walter³⁸

Mathew Walter was employed as a teacher in the 1990s, when he was in his 20s. He taught science courses along with psychology. Two reporters discussed Walter's alleged inappropriate conduct toward them. Several other reporters called to recount their understanding of an alleged inappropriate relationship between Walter and another female student.

(a) *Student 13*

Student 13 is a female who wishes to remain anonymous. Her allegations are as follows.

During her senior year, Walter began to sexually harass her. It began when he took her into a classroom alone and told her that the boys in her class didn't see how attractive she was, but that real men knew how attractive she was. When Walter observed Student 13 hug a male student, he instructed her to stop, stating, "all the blood [will] go his crotch." These types of comments continued throughout the year. Student 13 never reported the issue, both because she was afraid it would have repercussions and because she feared others would not believe her. In part, she believed that because it was known that her friend was involved with Walter, others would assume she was only jealous. Student 13 provided documents (which post-date her

³⁸ Walter declined to comment in response to the allegations in this report.

graduation, but pre-date this investigation) in which she and another former student referenced Walter's inappropriate actions.

(b) Student 14

Though this student never came forward, other credible reports alleged that a romantic relationship existed between Student 14 and Walter. One reporter stated that Walter once lectured the entire class about how they should not gossip about his relationship with Student 14. Another reporter, also wishing to remain anonymous, recalled that Walter told her that he was having a sexual relationship with Student 14 during Student 14's senior year. That anonymous reporter indicated that Walter said that he had fallen in love with Student 14. Documentary evidence confirms that these allegations were reported to Park's administration. The administration reprimanded Walter, both in person and in writing. Walter resigned indicating that he was no longer going to teach and was pursuing a career out in the field.

(c) Student 15

Student 15 is a former student who relayed the following allegations regarding Walters.

During Student 15's senior year, she dressed up on "role reversal" day to imitate her classmate, Student 14 described above. During gym and with others present in the gymnasium, Walter approached Student 15 and said, "Your outfit today ... If you wanted it, you'd have it." Student 15 responded with "What?" In response, Walter said, "You have what it takes." Student 15 felt very weird about the exchange. She never told anyone at Park about it, but other students were in the area at the time it occurred.

Student 15 conveyed that Walter had a clear lack of appropriate boundaries with his students. The students, according to Student 15, admired him as “cool” and “anti-establishment.” He befriended them, even attending at least one student’s birthday party. Because they felt connected to him, Student 15 indicated that she, and likely others, felt protective of him. When situations like the above arose, it was very confusing to Student 15 as to where her loyalties should lie. As an adult, Student 15 now realizes Walter’s conduct, and in particular his failure to observe appropriate boundaries, was highly inappropriate.

B. Unnamed Faculty Members

1. Anonymous Female Teacher

A former faculty member who wishes to remain anonymous stated that Tom Fulton³⁹—Head of School at the time—told her directly that he dismissed a female teacher for having inappropriate relationships with two senior male students. Neither of the students in question came forward. The employment file regarding this employee contained no information on this subject.

2. Anonymous Coach

A female student who wishes to remain anonymous, Student 16, provided the following allegations of inappropriate behavior by a coach. Due to this student’s desire for anonymity, this report does not include details about the sport or timeframe involved. Because this report is otherwise uncorroborated and the reporter wishes to remain anonymous, we are limited in our ability to identify the coach. We have, however, connected the anonymous

³⁹ Fulton is deceased.

reporter with the appropriate authorities for further investigation. The female student shared the following allegations regarding the coach.

The coach was not an educator, but was engaged by Park solely for coaching. The coach began texting Student 16, as well as another female student. She reports that the text messages contained nude photos. Messages that accompanied the photos were explicit and inappropriate. The coach then began inviting the girls to go out to clubs. At some point, the father of the other female student on the text message chain read the messages. Student 16 was told by the other female student that her father confronted the coach directly and then blocked the number. Student 16 does not believe that anyone at Park was informed about the incident. Student 16 did not report the matter to the police or any other authorities beyond Park, and to the best of her understanding, neither did the other female student or her father.

In addition to the above, when the coach would participate in practice games, the coach was overly aggressive, making contact with Student 16's pelvic region. At the time, she thought it was funny, but she now realizes that this was inappropriate.

C. Incidents with Non-Faculty Members

1. Erwin Michael Chapin⁴⁰

Erwin Michael Chapin (“Chapin”) lived on campus in the late 1950s. He was the nephew of then Head of School, E. Barton (“Bart”) Chapin. His father may also have been employed at Park. Chapin was between 17 and 23 years of age and assisted taking care of the horses on campus at that time. He was often seen wandering the campus.

(a) *Dee Dee Danahy Booth*

Dee Dee Danahy Booth attended Park from fifth grade until her high school graduation in 1965. Dee Dee shared the following account from her time at Park, including allegations pertaining to Chapin.

During her sixth-grade year, at age 11, Dee Dee stayed after school to attend a photography class. During a break, she decided to go for a walk with some other students. Chapin approached them and asked if they were going for a walk. They responded affirmatively, and he joined them. The group walked toward the pond, and the other students wandered to the other side. Dee Dee was left alone with Chapin. Their view of the other students was obstructed by bushes and brush around the pond.

Without warning, Chapin knocked Dee Dee to the ground and tried to kiss her. She resisted. He fought back and put his left elbow across her neck to choke her. He then ripped her blouse off and pulled down her skirt. Chapin then attempted to have sex with her. When he

⁴⁰ Erwin Michael Chapin is deceased. During the timeframe in which he resided at Park, he was commonly called Mike Chapin.

finally let her up, he told her not to tell anyone. Dee Dee returned to photography class and told no one of the incident.

About a week later, another student confronted her about having sex with Chapin. Dee Dee assumes that Chapin must have been bragging about it. During a bus ride home, another male student tried to touch her and said, “you slut, you whore.” She denied his accusation, but was devastated. Her behavior changed and she began failing classes.

Helen Long, the then Head of Middle School, called Dee Dee into her office and asked what was going on. Dee Dee did not disclose the incident to her. At that time, Bart Chapin was the Head of School. A few days later, as Dee Dee was passing the building that housed Bart Chapin’s office, she saw her father, in tears, exiting the building. Two days later, her parents told her that Bart Chapin said she had been flirting with his nephew, Mike Chapin, and that when Mike tried to kiss her, she ran away. They told her that Bart Chapin characterized it as “puppy love.” She did not tell her parents otherwise at that time. Dee Dee did, however, confide in her younger brother.

Throughout high school, Dee Dee would be harassed by other male students and sometimes inappropriately touched because they thought she was “sexually accessible.” On one occasion, she got into a fist fight with a male student which resulted in her being called to Bart Chapin’s office. Bart Chapin suggested that she see a psychiatrist and referred her to one who was also the father of another Park student. Following his suggestion, Dee Dee went to see the psychiatrist. He asked her questions that indicated to her that he knew what had actually happened to her. Dee Dee always assumed that Bart Chapin must have told him.

During her senior year, Dee Dee applied to several colleges that she was otherwise qualified for, but was denied admission. When she went to see the guidance counselor, Jane Chapin,⁴¹ Dee Dee saw her file on Mrs. Chapin's desk. On the front of her transcript was a note stating, "has seen a psychiatrist." To Dee Dee, this again confirmed that Bart Chapin must have known what really happened and covered it up. In Dee Dee's mind, it also explained why schools she was otherwise qualified for rejected her.

Dee Dee confronted Mrs. Chapin about the notation, who said, "what's in the past is in the past." Mrs. Chapin elaborated that she could not erase what was on the transcript, but said that she would get in touch with the admissions committees at the two remaining colleges that Dee Dee had applied to—Russell Sage and Garland—and tell them that Dee Dee would be a good candidate for their schools. Mrs. Chapin stated that she would clarify to the admissions committees that Dee Dee only went to the psychiatrist once for professional advice. Dee Dee interpreted Mrs. Chapin's discussion with her to be an attempt to right the wrong committed by Michael Chapin and covered up by Bart Chapin. Ultimately, Dee Dee was accepted at Garland.

Dee Dee's student file was archived, but had been reduced to a final transcript and test scores, as well as two letters of recommendation for college admissions. What remained of the file did not contain any notation about seeing a psychiatrist or anything about Michael Chapin's attack.

One of the letters contained in the file, however, was from Bart Chapin to Garland College's Office of Admissions, wherein he stated, among other things, that Dee Dee was "an

⁴¹ E. Barton Jr. and Jane Chapin were married. Both are deceased. Michael Chapin was their nephew.

extremely responsible citizen of the community,” and “not the kind to succumb easily to blandishment or punishment.” He concluded, “I would recommend her without hesitation as a person who, I believe, will be a solid contributor in the college community within a program designed to meet her needs.”

After having her own children, Dee Dee decided to tell her parents the truth. Her parents apologized and said they had no idea. Her mother told her that Bart Chapin never mentioned anything more than kissing.

2. Anonymous Visiting Speaker

One reporter, also a former student, recalled an alleged inappropriate relationship between a fellow classmate and guest speaker.⁴² The speaker came in several times to work with the junior level English class. After one such visit, the reporter and another student, Student 17, drove the speaker back to his house. Student 17 and the visiting speaker took LSD, while the reporter opted not to. The visiting speaker and Student 17 disappeared upstairs. A while later, the reporter went to check on them and found them having sexual intercourse. The reporter did not notify anyone of this and believes that Park had no knowledge of the incident.

3. Anonymous Male Student 1

Another reporter—a former student who called primarily in relation to another faculty member—also shared an experience of alleged inappropriate conduct by another student, which was inappropriately endorsed by at least one teacher. This reporter stated that during her sophomore year a male student began behaving inappropriately, including following her between

⁴² The reporter could not recall the name of the speaker.

classes and sitting outside her classroom door. She perceived that other teachers were generally aware of his behavior. Tom Bailey, in particular, would tease her about the situation. She expressly told Bailey that she did not find it funny, but he continued to tease her. Bailey's teasing made this reporter feel as though she was in the wrong and that the male student's behavior was acceptable. Ultimately, the male student involved was confronted by another student about the issue and an altercation ensued, which led to the inappropriately acting student being expelled.

4. Anonymous Male Student 2

A former female student—who wishes to remain anonymous—relayed one of the accounts above and also described an alleged incident with another student, as detailed below.

When the female reporter was in fifth grade, a senior male student made her very uncomfortable by following her around campus, taking photographs of her, and waiting outside her classroom. She believes the senior male student may have had a diagnosed behavioral issue, though that could not be verified in the available records. In addition, inappropriate notes often appeared in her locker. The notes left in her locker would say things like “come learn about sex with me.” After receiving the notes for several months, she told her mother about them. While she felt certain the notes were from the senior student, Park was not provided with the actual notes and was therefore unable to confirm the source of the notes. As a resolution after discussion with both students' families, a female teacher escorted the female student from class to class until after the senior male student graduated. The male student was instructed to stay away from her. In retrospect, the female reporter believes this situation should have been handled differently. The administrator involved indicated that if he had known the resolution

was unsatisfactory to her or her mother, he would have worked with them on additional safeguards.

5. Anonymous Male Student 3

Student 17 was in elementary school at Park in the 1950s. During her time there, a male student in the high school molested on her on multiple occasions. On one occasion, he singled her out and separated her from the group of students during a school event. On another occasion, he approached her in the bathroom outside the dining hall. At the time, she did not report the incidents to anyone at Park. It was not until late in her adulthood that she finally told her mother of the incident. At the time it happened to her, she had no education on inappropriate touching and did not know how to handle the situation. Student 17 shares this now to let others know that this does happen and that educating students about this at a young age is incredibly important.

OBSERVATIONS

The reports from former students included incidents of inexcusable behavior—occurring largely between the 1960s and the 1980s—on the part of faculty, and an arguable lack of oversight by the school’s administration. To be fair, however, very few of the alleged incidents described herein were reported to the school at the time.

While some of the alleged conduct occurred off campus and, in isolation, may not have raised any red flags, some of the allegations demonstrate repeated historical failures by the school to monitor faculty behavior and adequately protect students.

Certain trusted teachers took advantage of the power that inherently exists between figures of authority and students. In some instances, accounts suggest that rumors about some of the teachers in question were well known. The school’s failure to investigate those rumors as they circulated, including the failure to even inquire of the student or the student’s family about them, reflects poorly on its administrators during the time periods at issue.

Moreover, some students perceived Park’s lack of action concerning these rumors as the equivalent of consent or approval of the teachers’ actions. While more permissive social attitudes at the time and a lack of knowledge about the long-term effects of abusive relationships on children may help explain these attitudes, they do not excuse the failure to investigate and act.⁴³

In other isolated instances, notably with Dee Dee Danahy Booth, the administration allegedly covered up the abuse; in other situations, teachers were allowed to

⁴³ It is important to note that these historical incidents are measured against present standards.

resign instead of being terminated. Failure to take actual disciplinary action, including termination, may have sent an implicit message to students that these types of behaviors would not lead to severe consequences. Further, quiet resignations allowed the accused teacher to maintain a clean employment record when moving to another institution, thereby potentially putting students at other schools at risk.

Also troubling are instances where students reported alleged inappropriate behavior and their concerns were either dismissed, or the student was expressly told to keep quiet. That type of response promotes a culture of silence and defeats the very type of transparency that current administrations have sought to foster. Put another way, the school's historical handling of these allegations failed to meet today's standards. Recognizing these failures and the institutional structures that contributed to them should inform and guide Park's path forward.

Listening to the reporters share their experiences, and speaking with former employees, it became apparent that there were overlapping and sometimes identical factors that contributed to Park's failure to notice and/or stop the inappropriate conduct outlined above. In many instances, the reporters were insightful and identified these factors themselves. Many of these factors were more prominent in the 1950s through the 1980s and became less commonplace throughout the 1990s and into the early 2000s. Understanding these factors and learning from them is critical to protecting Park's current and future students.

First and foremost, Park's faculty and administration lacked a clear understanding of how to deal with allegations—whether direct or rumored—of inappropriate relationships between students and faculty and/or faculty abuse and misbehavior. For example, one former

administrator commented that faculty overheard rumors exchanged between upperclassman about Adkins allegedly having inappropriate relationships with the male students who stayed with him in Vermont. In one instance, a former administrator commented that he heard a rumor regarding a faculty member's son who had spent that summer in Vermont with Adkins. When asked if anything was done in response to that rumor, he confirmed that no action was taken since the child's parent was also employed at Park and never raised the issue directly with administration. Those administrators avoided the situation rather than address it.

Likewise, one former administrator acknowledged that older students complained to each other about Doug White always having a camera with him and questioned why he would frequently photograph students. When asked why these concerns alone were not sufficient to justify taking action, the former administrator explained that absent direct proof of White's misconduct, one did not accuse a faculty member of such things. The former administrator acknowledged that the situation would be addressed differently today.

When asked whether any attempt was made to talk to the students who were the subject of the rumors concerning White's photography, former employees from that time period felt that such confrontation would be inappropriate. Despite understanding that students' well-being could be at risk if the rumors were true, faculty members did not take any initiative to determine whether any of the rumors were based in fact.⁴⁴

Compounding the situation further, former administrator Gary Williams noted that in the 1980s, he perceived the school to be "confusing leniency with progressivism." His

⁴⁴ One notable exception to this was with regard to Walter.

concern was so significant that he declined an offer to be the Head of School and moved on to another institution. Multiple reporters who shared their thoughts noted that this type of leniency was interpreted as permission.

Also, for much of the period this report covers, there was no defined protocol for reporting such allegations—either for students or faculty. Former faculty admitted that while they sometimes felt uncomfortable about situations, there was no process by which they could share their concerns. It is easier to remain silent when there is no clear reporting structure. The same was true for students. In most instances, faced with an imbalance of power, no understanding of how to handle the situation, and no designated administrator with whom to talk, the student remained silent.

Second, the faculty culture during these years was highly individualistic. Park's teachers were retained on yearly contracts. As a result, no one knew who was staying or leaving until contracts were renewed for the following year. This likely led to some competitiveness and a fear of being labeled a troublemaker for raising concerns about another teacher. When a teacher's contract was not renewed, most assumed it was performance related, and there was rarely, if ever, further discussion about that teacher's departure or the conduct that might have led to it. While annual contracts are a norm within the private school industry, there are additional safeguards that can be put in place to ensure reporting. Those safeguards did not exist during the timeframes in question, but in 2015 Park updated its Employee Handbook, which added and strengthened some of those safeguards.

Third, many of those interviewed stated that one of the attributes of a private school education—close and personalized relationships with teachers—also created multiple

opportunities for some teachers to take advantage of students. As one reporter commented, when a teacher asked a student to dinner, it was seen as one of the extra benefits of a private education.

Likewise, neither parents, nor other faculty members, thought it was odd that students would go to a teacher's home or spend time fraternizing with their teacher outside of school. Traditional student-teacher boundaries were not well-defined and were often blurred. In the 1990s and 2000s, it appeared that boundaries between teachers and students at Park became more pronounced. Administrators and faculty began to demonstrate a heightened sense of what was appropriate while still maintaining close and meaningful relationships. The handbook created in 2015 sought to further clarify those boundaries.

Fourth, the close-knit dynamics of the school lessened objectivity in assessing these situations. For example, when accusations surfaced regarding Bailey, it was assumed that they were not true, as he was a well-respected and beloved teacher. Other faculty expressed trepidation about expressing any complaints they may have had about Jackman out of concern that his father-in-law was a trusted faculty member.⁴⁵ The same is true of Bart Chapin's alleged handling of the transgression committed by his nephew. While the close-knit nature of the school community can be beneficial, it also requires individuals to recuse themselves from the decision-making process when personal connections or feelings might cloud judgments.

Lastly, faculty, students, and parents were historically not familiar with tactics or actions associated with grooming. This was undoubtedly a function of the times, as such issues

⁴⁵ While some faculty engaged in self-censorship, there were no allegations that Jackman's father-in-law was aware of the allegations at issue here or took any steps to actively protect Jackman.

were largely unknown and were not discussed in any setting. Befriending students' families, bringing students treats, having students sleep over, and/or taking them on personal trips are all now well-known risk factors for grooming.

While these factors relate to troubling events, approximately one-third of the reporters made it a point to say that, overall, they valued their experience at Park and described it as an institution of which they are proud to have been associated. Those reporters requested that this investigation convey their sense of connection to the school and that each has benefitted immensely from the education he or she received at Park.

CONCLUSION

We are grateful to each of the former students who came forward to share their experiences. Sharing these took tremendous courage and, for many, brought about significant emotions. Without their willingness to share, this investigation and the ability to learn from the past would not be possible.

Park's current leadership and the Board have affirmed their commitment to ensuring that any misconduct that occurred in the past will not be ignored, and that they will make every effort to ensure it will not occur in the future. As a result of this report, Park's leadership is committed to an annual review of its policies and procedures with a specific focus on the accounts and factors discussed above. Likewise, this report will serve as the basis for renewed conversation with faculty and students about the importance of transparency in addressing these types of issues.

To the extent there are former students who have not yet contacted the school or its outside independent counsel, but may wish to do so now, those alumni are welcome to share their stories in confidence by contacting Julia Hilliker at (716) 848-1547. While no further report is anticipated at this time, experiences shared in the future will continue to inform Park's assessment of its policies and procedures.

Dated: December 5, 2018