



ST. GEORGE'S SCHOOL

December 23, 2015

Dear St. George's School Alumni,

This memo serves as the public report of the School's investigation into sexual misconduct towards students by members of the community at various points during the past fifty years. In commissioning this inquiry, the School has sought to better understand its past, so that we can help those students who were harmed, help heal the community as a whole, and help ensure the safety of the School's current and future students.

Genesis of the Investigation:

The roots of the present inquiry reach back to the 2011-12 school year, when an alumna approached the current School administration with a detailed report of abuse she had suffered from Al Gibbs, a former trainer. She sought assistance with reimbursement for counseling expenses related to the trauma and its aftermath. Her request was ultimately brought to the Executive Committee of the School's Board of Trustees by the administration where the decision was made to provide the support for the counseling expenses requested by the alumna.

In the intervening years, three factors converged to impel the School to launch a full investigation. The first was the evolving landscape of best practices, as schools and organizations began to understand the importance and positive impact that full inquiries could have, as seen in the investigations recently undertaken by peer institutions. The second factor was the suggestion made by alumni that an investigation was warranted, pointing out the inquiries launched by various other schools, and requesting that the School follow suit. The final factor was the recent discovery by the present administration of additional information that suggested both wider misconduct and greater awareness of misconduct by former School personnel than had been previously known. These factors converged in early 2015, and the administration requested a full inquiry.

In response, nearly one year ago, the Board moved, at its own initiative and expense, to commission a full investigation into these matters, seeking the truth about the School's past, without reservation and without limitation. The investigation mandate was wide open – it was not focused on any one era, one incident, one perpetrator, or one allegation. We wanted to know all we could about the past and what had happened, so that we could help.

The Process of Investigation:

The Board selected the law firm of Schwartz Hannum PC to lead the inquiry, based on the firm's prominence in education law and experience in representing more than 200 educational institutions and conducting investigations for numerous schools. The School chose Will Hannum, a named partner and the firm's most experienced investigator, to lead the investigation. Mr. Hannum is regarded as an expert for his work in this area, having led dozens of inquiries for independent schools. He is the author of nationally recognized guidelines and articles on conducting investigations and responding to sexual abuse in schools, and has presented across the country on these issues. More importantly, as was expressed by many reporting victims, he brings compassion, professionalism, and experience to these difficult conversations.

Questions have been raised regarding the structure of the investigation, in which one member of the firm is serving as investigator, while another partner represents and advises the School. While the question is an understandable one, this sort of structure is not unusual and has been used in many investigations similar to ours. Schwartz Hannum and other law firms have managed dozens of investigations using similar protocols. In this case, Will Hannum's role was strictly as a collector of information. He has not, nor will he, provide any legal advice to the School. The functions and responsibilities are separate and distinct, without overlapping roles or information. Whether paying one firm/investigator or two, so long as the School is paying for professional investigative services, a claim can be made that the investigation is not wholly "independent." The School instructed Mr. Hannum to uncover the truth of what happened – good, bad or ugly – without reservation. Therefore, what matters most is the independence of judgment and professionalism of the investigator. The School has not in any way directed, altered, or influenced Mr. Hannum's gathering of the facts, and alumni can have the utmost confidence in the integrity of this report.

The investigation went public on April 7, 2015, when the School sent the first of three (3) letters to the School community inviting anyone with information to come forward. [These letters](#) are available on the School's website: Letter from Eric F. Peterson and Francis S. Branin, Jr. to School Community (April 7, 2015); Letter from E. Peterson and Leslie B. Heaney to St. George's Alumni (August 21, 2015); Letter from E. Peterson and L. Heaney to St. George's Alumni (November 2, 2015).

In response to the School's letters, more than one hundred individuals came forward to share information. The nature of the information ranged from first hand, direct experiences of abuse, to second or third hand stories of others' experiences, to the occasional rumor or a generalized belief/description, but all of the information was important. After speaking and meeting with the witnesses, and after reviewing thousands of documents provided by the School and by some witnesses, on Saturday, December 12, 2015, the School's investigator made a report to the full Board, with the expectation that a report would be shared with the community before the end of the calendar year.

In addition, over the past several months, the School has been working with, and continues to work with the authorities, including the Rhode Island State Police, regarding former employees and former students who were reported to have sexually assaulted students at the School. At the direction of the authorities, given the possibility of criminal prosecutions, the School has not directly approached those perpetrators who are still alive. We have been instructed in writing by the Rhode Island State Police that we should not make public the names of any living perpetrators named by witnesses in the investigation, both out of deference to their investigations and out of respect for the privacy of the victims. Therefore, living perpetrators are not named in this report.

Scope of the Investigation

The investigator had multiple communications with most witnesses, including a combination of emails, phone calls and in-person meetings. Almost all witness communications were initiated by the witness, except in the case of some current or former School faculty members and administrators. A small number of witnesses have repeatedly postponed their respective interviews.

No alleged perpetrators were contacted as part of this investigation. Some are deceased; in other cases, the School has referred the matter to law enforcement to take appropriate action, and until law enforcement has closed any particular case, the School has been instructed not to contact the alleged perpetrator.

Both the School and various witnesses have shared thousands of pages of documents, including letters, emails, social media communications, faculty records, student records, yearbooks, documents in connection with *Jane Doe v. St. George's School*, and other documents.

Given the professionalism and experience of the investigator and thoroughness of the investigation, the School has high confidence in the inquiry's depth, breadth, and the factual accuracy of the information received. That said, the School also recognizes that there may be information that was not shared with investigators, or that may yet still emerge. In this way, while this report is an accurate reflection of what we have learned, the School acknowledges that other, additional information may exist. It is our hope that victims or witnesses in possession of such information will someday share it with the School, in the confidence that it will be well and carefully handled.

In addition, we use the word "victim" cautiously, recognizing that for some people the word "victim" can be offensive, or worse. No offense is intended. Others might prefer the word "survivor," or some other term. However, in the interest of clarity, we use the term "perpetrator" to refer to an employee or student who perpetrated abuse on a student, and the term "victim" in reference to the student who suffered such abuse.

The Findings of This Report

With that background in mind, this report strives to offer a fair, succinct portrayal of the credible information obtained in the investigation.

A. Reports of Employee Perpetrators with Multiple Victims

Based on credible statements and documents provided by witnesses who were at the School in the 1970s and 1980s, the investigation has received twenty-six credible first-hand accounts (as well as other corroborating evidence) strongly suggesting that three former employees of the School engaged in sexual misconduct with regard to *multiple* students, and that there were twenty-three victims of sexual misconduct by these three employees.

1. Al Gibbs

Al Gibbs was an Athletic Trainer at St. George's from 1973 to February 1980, when he was dismissed after a male student discovered Gibbs photographing a nude female student in the athletic training room. Gibbs passed away in 1996.

Based on seventeen first-hand accounts (by students from the Class of 1976 through the Class of 1982), Gibbs engaged in a range of inappropriate behavior and sexual misconduct including kissing two female students publicly, telling students to remove their clothes without reason, taking nude photos of three students (and in some cases showing such photos to other students), fondling or grabbing the breasts of seven different students, touching the genitals of three students, and in one case rape.

Former Headmaster, Mr. Anthony Zane, said that he fired Gibbs in February 1980 after receiving a report of inappropriate activity by Gibbs, and after Mr. Zane then spent several days inquiring into Gibbs's misconduct.

Specifically, based on several witnesses' reports, in early 1980, a senior came by the training room, saw flashes under the door, became afraid that there was a fire, and barged in. He came upon a female student totally nude

in the whirlpool with her eyes covered as protection from a heat lamp, and Gibbs was photographing her. The senior reported this incident, and Gibbs was fired within a week thereafter.

Most victims, and some other witnesses, indicated that they believe that the School should have inquired into and taken action with respect to Gibbs in the years prior to terminating his employment. For example, several witnesses have observed that the School might reasonably have exercised more supervision of Gibbs, as he was allowed to work as the trainer for female students in his training room, which was accessible only through the boys' locker room.

Regrettably, the School did not report misconduct by Gibbs to any state agency at the time of his termination in 1980.

On March 24, 1989, during the pendency of the *Jane Doe* litigation (described below), the School made a report about Gibbs to the Department Of Children And Their Families ("DCF," the predecessor agency to the Department Of Children, Youth & Families, "DCYF"). On April 12, 1989, DCF responded in writing to the School's report by stating that DCF was without jurisdiction to act because the students in question had all since turned eighteen, and Gibbs was not a parent or other person whose conduct must be reported under the reporting law. There was no further report to the authorities, as Gibbs passed away in 1996, until February 1, 2012 when, based on the report of the alumna who had come forward, the School reported Gibbs again to DCYF.

2. Employee Perpetrator #2

Employee Perpetrator #2 was employed at St. George's until 1974, when he abruptly left the School after a report to the School of his inappropriate conduct with a male student.

The investigation learned that this former employee reportedly had inappropriate and potentially sexual contact with at least three male students, including sharing a bed and trying to touch students in bed.

The investigation determined that the School quickly terminated this employee after a student's parent reported the misconduct to Mr. Zane. Mr. Zane confronted this employee, who admitted to the misconduct. Thereafter, Mr. Zane also tried to prevent this employee from getting another job that would involve contact with students.

At the time, the School did not report this employee's misconduct to any authority. In the course of this investigation, the School has made a report about his misconduct to the Rhode Island State Police.

3. Employee Perpetrator #3

Employee Perpetrator #3 worked at St. George's in the 1980's. In May of 1988, Employee Perpetrator #3 was fired after an inquiry into accusations that he had an inappropriate relationship with a student.

Based on four first-hand accounts and nine second-hand accounts, Employee Perpetrator #3 reportedly engaged in sexual misconduct with at least three students. Witnesses reported that Employee Perpetrator #3 frequently entertained students in his apartment. He also reportedly hosted smaller groups of students on off-campus trips. The three first-hand reports of sexual assault by Employee Perpetrator #3 reportedly happened off campus. The misconduct by this former employee included providing alcohol to students, writing love letters to a student, watching pornography with students, touching students sexually, including fondling a student's penis, engineering nude encounters with a student, and sleeping in the same bed with a student.

The School's former psychologist, Dr. Peter Kosseff, a private practitioner who contracted to provide services to the School, recalled that, in the spring of 1988, a student came forward with what Dr. Kosseff determined to be a credible complaint about an incident involving the student being naked in front of Employee Perpetrator #3. Dr. Kosseff has declined to reveal the names of other relevant witnesses, citing patient confidentiality and doctor-patient privilege.

Two students, former Headmaster Rev. George Andrews, Dr. Kosseff and a former administrator have described the events surrounding Employee Perpetrator #3's termination similarly: a student spoke to Dr. Kosseff about Employee Perpetrator #3; Dr. Kosseff communicated with School administrators about that; and Employee Perpetrator #3 was terminated immediately thereafter. All of this took place on the same day in May 1988.

Nonetheless, some witnesses have indicated their belief that the School might have inquired into and taken action with respect to Employee Perpetrator #3 in the years prior to terminating his employment.

- Mr. Zane recalled that in 1983 or 1984, he warned Employee Perpetrator #3 "not to give students more backrubs," after Mr. Zane received a report from an adult. Mr. Zane did not recall who made that report.
- Rev. Andrews recalled having knowledge of a report, in 1984 or 1985, that Employee Perpetrator #3 rubbed a student's back inappropriately.
- A former student recalled that in either 1984 or 1985, he was called into Headmaster Andrews' office, together with other School administrators and was asked to discuss the student's relationship with Employee Perpetrator #3. The student said that he did not reveal anything damaging about Employee Perpetrator #3 during this meeting.

The School did not report Employee Perpetrator #3's misconduct to DCYF in 1988 on the advice of then legal counsel. In the course of this investigation, the School has made a report about his misconduct to the Rhode Island State Police.

B. Employee Perpetrators with One Victim, Based on First-Hand Reports

Based on statements and documents provided by witnesses who were at the School in the 1970s and 1980s, this investigation has received three credible first-hand accounts (as well as other corroborating evidence) strongly suggesting that three former employees of the School each engaged in sexual misconduct with a single student, and that there were three victims of such sexual misconduct.

4. Employee Perpetrator #4

Employee Perpetrator #4 worked at St. George's from the late 1960s until 1971. It is unclear why he left the School. One student said that Employee Perpetrator #4 gave him gifts, worked with him during two consecutive summer jobs (and during those summers that they attended parties and did drugs together), and ultimately slept in the same room with him during the summer, where the student was raped.

The School first learned about alleged misconduct by Employee Perpetrator #4 during this investigation. In the course of this investigation, the School has made a report about the misconduct to the Rhode Island State Police.

5. Employee Perpetrator #5

Employee Perpetrator #5 was hired to work at St. George's in 1971, and was terminated a few months later after providing alcohol to students.

Employee Perpetrator #5 reportedly sexually touched and attempted to perform oral sex on a student.

The School first learned about allegations regarding Employee Perpetrator #5 during this investigation. In the course of this investigation, the School has made a report about the misconduct to the Rhode Island State Police.

6. Employee Perpetrator #6

Employee Perpetrator #6 was employed at St. George's during the 1970s and 1980s. Employee Perpetrator #6 and a student were reportedly involved in a long-term emotional and sexual relationship, during and after the student's time at the School. As a result of this relationship, the student reportedly attempted suicide, suffering severe injuries.

The School first learned about allegations regarding Employee Perpetrator #6 during this investigation. In the course of this investigation, the School has made a report about the misconduct to the Rhode Island State Police.

C. Student Perpetrators, Based on First-Hand Reports

Based on statements and documents provided by witnesses who were at the School in the 1970s and 1980s, this investigation received three credible first-hand accounts (as well as other corroborating evidence) strongly suggesting that three former students of the School each engaged in sexual misconduct toward a single student, and that there were three victims of such sexual misconduct. Two of these incidents were previously known to the School in some degree, one was uncovered during this investigation.

1. Student Perpetrator #1

Student Perpetrator #1 was a student at St. George's during the early 1970s. Student Perpetrator #1 reportedly raped a freshman. The student-victim reported that until now, he/she has never spoken to anyone about what happened.

The School has made a report to the Rhode Island State Police about Student Perpetrator #1.

2. Student Perpetrator #2

Student Perpetrator #2 was a student at St. George's during the late 1970's. The student-victim has asked not to be identified in this report. Student Perpetrator #2 reportedly assaulted a younger student in public. Another student corroborated this as a witness.

The School has made a report to the Rhode Island State Police about Student Perpetrator #2.

3. Student Perpetrator #3

Student Perpetrator #3 was a student at St. George's during the early 1980's. A student said that Student Perpetrator #3 touched him while this student was asleep in his dorm room. He later told the Dean of Students about this. Student Perpetrator #3 was expelled shortly thereafter.

The School made a report to the Rhode Island State Police about Student Perpetrator #3.

The "Jane Doe" Lawsuit

In 1988, a student from the Class of 1980 sued the School, alleging that she had been raped and sexually abused by Gibbs. At the time, the lawsuit did not include her name; it referred to her as "Jane Doe."

Jane Doe and other victims who are aware of the School's litigation strategy stated their view that the School's conduct in the lawsuit in 1988-1989 was traumatizing, and in other cases may have made other victims reluctant to come forward. Accordingly, an understanding and acknowledgment of that perspective is likely important to the School community and the victims' healing and recovery from the history of abuse by several of its former employees. Our acknowledgement of, and regret for, any additional harm to victims is genuine and deep.

Other Reports Not Detailed

The investigation received other reports of professional misconduct (including reports from other decades), ranging from teachers drinking while on duty, wrestling in the halls with students, and boundary issues. For example, a report was made by an alumnus from the 1970's that a former faculty member entered the student's room at night and rubbed him on his rear end through a blanket. The student reported that when he threatened the faculty member, the faculty member departed the room. Other reports are not detailed because the information was either not corroborated, incomplete, second or third hand, and/or was related to behavior outside the scope of the investigation into sexual misconduct and sexual assault as noted above.

The School's Responses

Four of these six former employees were dismissed by the School, and one student was expelled, after the School became aware of misconduct. In those instances, the School promptly inquired into the alleged misconduct and responded. With respect to the other perpetrators, we understand that the victims did not report those assaults to the School during the victims' time at the School. However, ultimately, we cannot be certain of whether the School possibly knew more before those perpetrators left the School. Regardless, it is evident that School failed on several occasions to fulfill its legal reporting requirements to the authorities.

There is no finding that the School simply ignored a complaint of sexual misconduct. One witness has stated that her prior complaint of misconduct was ignored, but the investigation has been unable to conclude definitively what happened when. Nevertheless, from the School's perspective today – and as almost all victims and numerous other witnesses indicated – we believe the School could have done more to keep its students safe.

Responses to the Investigation

Impact:

Over the course of this investigation, many witnesses offered personal accounts of the impact that sexual misconduct and abuse had on them. Witnesses shared a range of consequences stemming from the abuse they suffered, including that they acted out or became rebellious, no longer participated in sports, experienced a difficulty with intimacy and relationships, suffered depression, felt shame and embarrassment, were unable to form healthy, intimate adult relationships, and attempted suicide.

It is heartbreaking to hear these reports and to contemplate how St. George's students have experienced abuse and suffering as a result of their time at the School. The School deeply regrets what happened to them, and we pledge to do all we can to support and help them in their efforts to heal.

Other Witness Comments on the Investigation:

Almost all witnesses welcomed the School's open inquiry. Most strongly encouraged the School to continue down the path of transparency and reconciliation. Many expressed the hope that the School will continue to reach out to victims of abuse in order to offer them assistance. And many encouraged the School to report the findings of this investigation to the St. George's community.

Likewise, many witnesses expressed the hope that the School will continue to review its policies and educate its employees and students about issues relating to sexual misconduct in order to promote student safety and foster a culture of openness and respect.

Helping Survivors

During the investigation, the School asked witnesses and victims what they would like to see the School do, and the School has consulted several experts on this important topic. The School is presently moving forward to help all victims as much as possible.

Transparency:

The School is committing to as much transparency in its communications as possible. We want to respect the instructions of the state authorities, so that they can do their jobs. We want to respect the privacy of victims: their stories are not the School's to tell. But, we also want to share candid, important, and deeply troubling information about the School's past. This report is an important part of that effort.

Our Apology:

Most importantly, and above all, the School wishes to formally make a meaningful apology to those who were harmed at the School. On this point, let us be clear and unequivocal:

To all victims, we are truly, deeply sorry for the harm done to you by former employees or former students of the School. We are heartbroken for you and for the pain and suffering that you have endured. We pledge to do all we can to support you in your efforts to heal, if you want or need our support.

Of course, it is not enough to simply apologize in this report. It is not enough even to say it to you in person, as we have done in some instances and as we will continue to do for all who want to meet with us. We recognize and we also deeply regret that there is nothing that we can say that will heal your wounds completely, but we are committed to doing what we can to assist you.

Beyond our apology, the School is committed to taking concrete and decisive steps to support the victims, and to assist them in their continued recovery. To that end, the School is doing the following:

Immediate Counseling Support:

As an initial step, the School has reached out to those victims who responded to the November 2, 2015 letter seeking treatment, and we have advised them that they may begin to receive treatment at the School's expense, immediately.

There has been some concern that victims were asked to approach Will Hannum as a first step towards reimbursement. This was implemented, from the outset, as a temporary solution, something that should have been made more clear, and was put in place so that reimbursement could happen immediately. This choice was predicated on the belief that speaking to someone who already knew their stories would be less traumatic for victims. It was not intended to create an obstacle or impediment to assisting any victim, either implicitly or otherwise. Once the full support mechanisms are in place, victims will be able to go directly to the clinician administering the fund for reimbursement.

Victims seeking to receive treatment have been advised that they may do so immediately, and that the School has approved in advance payment for their next ten therapy sessions. The School understands that ten therapy sessions will not be sufficient for many victims, and underscores that this is an advance approval – NOT a limit. The School wants victims to be able to get immediate assistance, without the obstacles of administrative processes. The School has extended this initial commitment so that victims can begin to seek care immediately. Ultimately, the independent administrator will be authorized to coordinate and reimburse care beyond the initial therapy sessions for victims who need additional counseling support.

Significantly, the School's offer of initial support does *not* require a legal release of claims and does *not* require any kind of confidentiality provision (or "gag" order) prohibiting the victims from speaking about their experiences at the School. The School is committed to allowing victims to speak freely about their suffering and their experiences, to help in their recovery, while also offering financial support.

Victims' Support Fund:

A victims' fund has been established by the School to provide funding for victims to seek therapy and other treatment, as well as to reimburse victims for past treatment. The victims' fund will be administered by an

independent clinician with experience in treating victims of sexual abuse. We have reached an agreement to partner with Day One Rhode Island, the leading social services agency in Rhode Island organized to deal with specifically with sexual assault. Day One will provide both crisis therapy services and provide a clinician administrator to coordinate speedy reimbursement of victims.

Hotline Numbers:

800-494-8100 For Free and Immediate Crisis Response, 24 hours a day, 7 days a week,
401-421-4100, Ext. 146 – For Rhode Island residents and therapy referrals

Victims’ Support Advisory Group:

The School is forming a victims’ support advisory group, whose members include alumni and other outside resources. The purpose of this group is to serve as a clearinghouse and sounding board for victims and their concerns, and to advise the School on issues of importance to the victims. We will be providing more information about this advisory group in the near future, and the community will be hearing directly from the advisory group in due course, as well. To date the following alumni and outside experts have agreed to serve as members of this group:

- Anne Kuzminsky ’81:** Alumna, and violence prevention educator;
- The Rev. Cam Hardy ’78,** Alumna, Chaplain, Millbrook School;
- Whit Sheppard:** Journalist, victims advocate, who wrote a compelling account of his own experience with sexual abuse in boarding school for the Boston Globe, in July of 2013;
- An additional male alumnus, TBD

Survivors Gathering

One of the first tasks for the advisory group will be to help advise the School on organizing a gathering of victims. This will be a private event, but one designed in collaboration with the victims to aid in their recovery and reconciliation.

Zane Dormitory:

The School acknowledges that for victims, the question as to whether the dormitory named in honor of Tony and Eusie Zane should be renamed is of special importance. This is a decision for the Board of Trustees, and will be addressed as soon as possible.

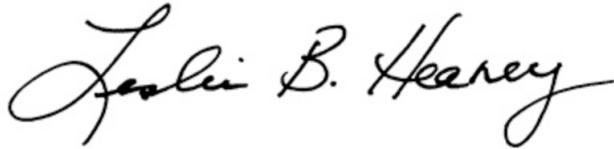
Education and Awareness:

In addition, the School renews its commitment to the entire School community – in honor of all who have suffered – that the School will continue to conduct regular and in-depth education and training for all employees and students to minimize the risk of sexual misconduct at the School now and in the future.

* * *

In closing, the School underscores its regret, sorrow, and shame that students in our care were hurt. We commit ourselves to taking responsibility, to healing those wounds, and to making every effort to mend the fabric of the St. George's community. We appreciate your support in those efforts.

Yours truly,

A handwritten signature in black ink that reads "Leslie B. Heaney". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Leslie B. Heaney '92
Board Chair

A handwritten signature in black ink that reads "Eric F. Peterson". The script is cursive and somewhat compact, with the first letters of each word being capitalized.

Eric Peterson
Head of School