

THE GOW SCHOOL

REPORT OF AN 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

A former student from the 1990s at The Gow School (“Gow”) reported in early 2019 an incident of inappropriate faculty behavior during his time at the school. Bradley Rogers, Jr., Gow’s current Headmaster, asked this former student to discuss his experiences, and he agreed. Gow’s administration immediately recognized the significance of this alleged violation of trust and the likelihood that this report was not unique.

Rogers then notified the school’s Board of Trustees of the former student’s report. The Board recognized the significance of these allegations and emphasized that misconduct of this type has no place at Gow, no matter when it allegedly occurred. The Board directed that a thorough and independent investigation of these historical matters be conducted to determine, to the extent possible, if other similar misconduct had occurred, and to share the findings with the Gow community, with a goal of understanding the past and preventing any such incidents from happening again. The Board retained outside legal counsel to conduct the investigation and appointed a Board committee consisting of Bradley M. Rogers, Jr. (Headmaster) and John Bullock (Chair of the Board of Trustees) to facilitate the investigation (the “Committee”).¹

¹ The investigation itself was conducted entirely by the author of this report. 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.

THE INVESTIGATION

On June 5, 2019, the Committee, on behalf of Gow, sent a letter to all alumni² describing allegations received, acknowledging the profound impacts these reported experiences have had on some alumni, and inviting anyone wishing to share information regarding educator misconduct to contact attorney Julia Hilliker as part of the independent investigation.³

Over the next eight months, twelve individuals (hereinafter “reporters”) initiated conversations with the author about historical incidents reported to have occurred at Gow. Of those twelve, ten were former students, one was a parent of a former student, and one was a spouse of a former student. In addition to the reporters, two current faculty members also shared information about a former faculty member, Paul Getzel,⁴ concerning conduct by Getzel after he left Gow.

Most reporters shared their own stories. Some shared their observations about other students, and others recounted rumors or even just their gut impressions. Some of the reporters elected to share their stories; others made an initial contact but elected to go no further.⁵ Some reporters continued conversations with the author over several months. The author also

² <https://www.gow.org/gow-connect/links-downloads>

³ As always, any information from or regarding current students is handled separately from the historical investigation in accordance with school’s normal procedures.

⁴ *See infra* pp. 14–15.

⁵ Information shared initially by these individuals was considered; however, absent the reporter being willing to participate in follow-up discussions, some of the information shared was uncorroborated and unable to be developed further without that individual reporter’s continued participation. That content is therefore not part of this report.

initiated numerous discussions with individuals not associated with Gow in an effort to corroborate certain information.

Specific reports spanned the period from the early 1990s to 2002, though two of the faculty members mentioned herein began working at Gow in the 1980s.⁶ Reported conduct included student bullying, inappropriate, but nonsexual, verbal exchanges with teachers, and inappropriate or forced sexual interactions. Two reporters identified inappropriate historical behavior by other Gow students and raised concerns about how faculty handled those matters.⁷

The reporters generally identified alleged educator misconduct impacting them directly, but some also identified other former students who they believed were likely victims of inappropriate faculty or staff behavior. Likewise, certain records named other potentially involved students. Out of respect for their privacy, and recognizing that individuals cope in different ways, no attempt was made to contact those former students. Rather, follow-up questions were asked only if a former student initiated contact.⁸

⁶ One reporter elected to remain anonymous and did not mention any timeframe.

⁷ Those reports were thoroughly investigated but are not detailed herein as they were either not corroborated or did not rise to the level of the other allegations contained here. The former students allegedly involved in misconduct are not named in this report, in part, because they were minors for all or part of the timeframe in which the conduct was alleged. Nonetheless, Gow's current administration has been provided with that information and efforts were undertaken to confirm that the issues raised were adequately considered and addressed in Gow's current policies and procedures.

In the course of the investigation, one isolated incident occurring more than two decades ago was confirmed involving a former faculty member. A teacher admitted that while joking around he tossed a student's book bag out a classroom window. He immediately realized that the student did not think it was funny and apologized to the student. The former student confirmed that while he did not recall the exact apology, the former faculty member was nicer to him thereafter.

⁸ 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.

This investigation also included a review of student files, personnel files, other school files, yearbooks, and interviews with former and current faculty. Given the dates identified in the reports, interviews with former faculty were limited; some are deceased, and others declined to participate.⁹ The review of personnel files was largely complete, although in some instances, files were incomplete or not available. Given the passage of time, the investigation concluded that unavailable files most likely resulted from incomplete record keeping, lost files, transfer problems, or routine file culling. There is no indication that files were purposely lost, destroyed, or withheld.

Where credible allegations¹⁰ of misconduct concerning a specific teacher or administrator were reported, further investigation into that individual's subsequent employment and public records of misconduct was conducted. In several instances, very serious charges and subsequent criminal convictions were discovered based on events after the individual left Gow. None of these criminal charges or convictions involved Gow students or the individual's work at Gow.

The author believes it took tremendous courage for the reporters to share their experiences. Reporters were given the option to exclude the particulars of their experiences from this report. Of those who wanted to share their stories, one elected to also share his name, while others preferred anonymity. Reporters are identified by name only if they gave permission.

⁹ 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 in their comments if they wished.

¹⁰ Credible as used herein means either that more than one report was made against the named accused or, if only one report was made, some other available evidence supported the allegation. Credible is not intended to mean that any definitive determination was made about the veracity of the allegations.

Where a reporter requested anonymity, specific identifying details have been purposefully omitted from this report to protect the individual's identity. After reading this report, please respect the privacy of those who came forward. In particular, please respect the wishes of those who chose to remain anonymous, and use appropriate discretion with the person who shared his name.

INSTITUTIONAL HISTORY

Since 1926, Gow has led the way internationally and nationally educating students with dyslexia and other language-based learning disabilities. Peter Gow, Jr. founded the school after his teaching experiences at traditional private institutions led him to conclude that many otherwise able students were encountering insurmountable academic difficulties, especially with print language. He moved his family to South Wales, New York, and converted the farm where he had run a summer camp into a boarding school for boys.

Collaborating with Dr. Samuel T. Orton, the pioneering neurologist whose research supported a phonetic approach to educating those suffering from “specific language disabilities,” Peter Gow developed the Reconstructive Language (“RL”) program. That program has provided otherwise high-functioning students with the fundamental tools they needed to succeed academically.

Over time, Gow continued to evolve and innovate. The campus expanded from one main building—a converted horse barn—to more than 30 buildings. Since its inception, Gow offered boarding to its students. In 1990, the co-ed Gow School Summer Program began, and in January 2012, Gow decided to offer day and boarding options to female students. Gow continues to base its curriculum on the RL program.

Despite Gow’s many success stories, Gow recently learned that it had unfortunate events in its past. The Board is committed to acknowledging and learning from the past, and to ensuring that its present policies and procedures properly protect its current and future students, faculty, and staff.

INCIDENTS

This section of the report will discuss the credible allegations¹¹ reported during the investigation.¹² Where a reporter elected to be named in the report, the involved faculty member was named. Where a reporter or reporters wished to remain anonymous, careful consideration was given as to when it was appropriate to name a faculty member. The Committee balanced the weight of the existing evidence, the benefits to the victims and the school community, the credibility of the assertions, and the potential harm in naming individuals when there were credible allegations but little or no additional supporting evidence.

¹¹ *See supra*, n. 10.

¹² Other reports of educator misconduct, some sexual in nature and some not, were received but are not included herein. Many of those reports were based solely on secondhand rumors or information. Others involved individuals who made an initial contact but declined to participate further in the investigation or on individuals who did not wish to have their allegations further investigated through interviews. Further, a limited number of allegations could not be corroborated with any records or with any witness account. While we do not discount those accounts, in the absence of corroborating evidence—such as someone with personal knowledge coming forward or documentation relating to the issue—those accounts of events were not included in this report. They were nonetheless investigated and will be included in the Board’s assessment of current policies and procedures. In addition, we will continue to accept reports from individuals who, after reading this report, believe they have direct knowledge and choose to come forward.

1. Thomas Simmeth

Thomas Simmeth was employed as an English teacher at Gow from approximately fall of 1993 to the spring of 2001.¹³ Multiple attempts were made to reach Simmeth regarding the allegations of inappropriate behavior at Gow, but he did not respond to requests for an interview.¹⁴

(a) *Student 1*

Student 1 attended Gow in the early 1990s. The following is based entirely on Student 1's recollection of events. During this timeframe, Student 1 struggled with his identity, including his sexuality, and with depression. Simmeth openly accepted Student 1 and became his confidant. Student 1 eventually confided in Simmeth that he was gay. He recounted that Simmeth made him feel loved and accepted.

Student 1 would often go to Simmeth's on-campus apartment. According to Student 1, it was common at the time for students to spend time at teachers' apartments. Simmeth would also buy alcohol and cigarettes for Student 1, though that was kept secret from other employees of Gow, according to Student 1.

¹³ Not all historical personnel files could be located. Some of the descriptions of years and educator roles discussed were taken from multiple sources, such as yearbooks, historical files, and anecdotal sources. It is therefore possible that certain descriptions may inadvertently omit a position held by an individual or the date of such position.

¹⁴ Simmeth did not respond to multiple requests for an interview or for comment. The author assumes he denies the allegations contained in this report.

On one occasion, Student 1 snuck into the woods with several other male students to smoke pot. After returning from smoking pot, Student 1 and some other students fooled around together sexually. Student 1 later confided in Simmeth about his experimentation.

Later that same evening, Simmeth appeared in Student 1's room and eventually began to perform oral sex on him. Student 1 said "no," but Simmeth allegedly continued to the point where he left marks on Student 1's penis. Simmeth eventually stopped and asked Student 1, "Why aren't you having fun?" Student 1 responded, "Oh, I'm depressed."

Student 1 said he never told anyone at Gow about the alleged incident, and as far as he knows, no one at Gow was aware of it. Interviews with several former faculty and administrators confirmed those individuals were not previously aware of the alleged conduct. Student 1 also confirmed that he did not tell his parents about the incident at the time it occurred.

(b) Student 2

Student 2 also attended Gow in the early 1990s. During his time there, Student 2 recalled that on two or three occasions, Simmeth came up to him from behind and put his arm around Student 2's neck. Student 2 inquired what he was doing on the first occasion it happened, and Simmeth responded, "you know, the choker hold." After the second time, Student 2 asked Simmeth to stop.

One evening, Student 2 was in his dorm room playing a video game when someone entered his dorm room, approached him from behind, and put the same "choker hold" on him. Although he could not see who was behind him, Student 2 knew in that moment—based

on the prior incidents—that it was Simmeth. Student 2 recalls his hearing began to fade, followed by tunnel vision, and then he passed out.

When Student 2 regained consciousness, Simmeth was standing in the corner of his room. Simmeth appeared surprised that Student 2 had lost consciousness. Just then, three of Student 2's friends¹⁵ entered the room, and Student 2 explained what had happened. Student 2 recalls that the three friends immediately began to punch Simmeth, and Simmeth left the room. Simmeth never denied Student 2's version of events.

A day or two later, Student 2 recalls that in a conversation about something else, Simmeth told him that when he passed out it only lasted a few seconds, thereby confirming to Student 2 that Simmeth had been there the entire time. After that, Student 2 told Simmeth that he had gone too far and to stay away from him. Student 2 said he never reported the incident to anyone at Gow. Neither did his friends, they said.

For the remainder of that year, Student 2's friends would verbally heckle Simmeth and say rude things to him. Student 2 believed that Simmeth would be fired if he reported what Simmeth had done to him. Consequently, he and his friends harassed Simmeth because, as Student 2 perceived it, Simmeth could do nothing about it without risking the choking incident being reported to school administration.

Student 2 observed that other students appeared to pick up on the tension between Student 2's friends and Simmeth. Student 2 also recounts that other students realized that

¹⁵ Two of the three friends were located and interviewed. Both recall walking in on the choking incident between Student 2 and Simmeth, though they had slightly different recollections about events involving Simmeth in the following months.

Simmeth did not punish Student 2 or his friends for disrespectful comments and that other students began to treat Simmeth the same way. Some students would tell Student 2, “Simmeth has the hots for you,” not to tease Student 2, but as a way to heckle Simmeth. Near the end of the school year, Simmeth approached Student 2 and told Student 2 that he had been questioned by administrators¹⁶ about his sexuality. Simmeth told Student 2 that his friends had to stop with the jokes. Student 2 agreed to ask his friends to stop heckling Simmeth.

(c) Student 3

Student 3 did not contact the author in this investigation. However, written materials indicated that in the later 1990s, Student 3’s parents reported to Gow alleged inappropriate sexual contact between Student 3 and Simmeth. At the time his parents made the report, Student 3 was no longer attending Gow. Administrators were unable to question Student 3 directly at that time and did not have specific details surrounding the allegations.

At that time, Gow did conduct an internal investigation, including a discussion with Simmeth, but Simmeth denied the alleged misconduct. It appears that that the matter was also reported to the police, but any investigation was inconclusive.

(d) Allegations of Misconduct after Gow

After leaving Gow, Simmeth taught at Linden Hill, a now-closed boys private school for dyslexic students in Massachusetts. In February 2003, Simmeth was charged with indecent assault and battery arising from an alleged incident on February 11, 2003 involving a Linden Hill student. That matter went to trial in October 2004, and Simmeth was found not

¹⁶ There is no written record of this meeting. Administrators from that time, contacted for this investigation, have no recollection of it. As noted above, Simmeth did not respond to requests for an interview.

guilty. The Greenfield District Court Clerk confirmed that no records remain from that trial, as the Court routinely disposes of records after seven years.

As indicated above, Simmeth did not return requests for an interview.

(e) *Present Lawsuit*

In December 2019, a former student initiated a lawsuit against Gow alleging that he was the victim of sexual actions committed by Thomas Simmeth.¹⁷ While Thomas Simmeth is referenced throughout the complaint that initiated the lawsuit, he is not named as a defendant in the lawsuit. That action is still in its very early stages.

2. Michael Holland

Michael Holland was employed at Gow from approximately 1985 to 1998.¹⁸ He held multiple positions, including but not limited to Director of Dormitory Life and Assistant Headmaster. Multiple attempts were made to contact Holland, but he did not respond directly to requests for an interview.¹⁹ Holland did, however, convey a message that he denied any and all allegations.²⁰

¹⁷ *John Doe 18049 v. The Gow School, et al.*, Supreme Court of the State of New York, Erie County (Index No. 816332/2019).

¹⁸ As discussed above, not all personnel files could be located. Some descriptions of years and educator roles discussed are based on multiple secondary 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 precise dates of service.

¹⁹ Holland's attorney returned the author's call. During that call, the nature of the allegations contained in this report were explained so that Holland could comment if he chose. Neither Holland nor his attorney provided any further response.

²⁰ A relative of Holland's did call to say that he was asked by Holland to tell the author that he denies all allegations.

(a) Student 4

Student 4 attended Gow in the early nineties. Student 4 recounted that Holland always struck him as odd, and that he always steered clear of Holland. Student 4 observed Holland often made physical contact with boys, such as picking them up from behind to crack their backs. Many male students spent time in Holland's apartment, which was common for dorm masters. Student 4 was clear in conveying that he never witnessed any explicit inappropriate contact between Holland and any Gow student, and that he never reported his uneasiness with Holland to anyone at Gow.

(b) Student 5

As discussed in detail below, Michael Holland was convicted in 2004 of inappropriate touching based on allegations made by a student at another school, also Linden Hill. That conviction received media attention. Shortly thereafter, a former student, Student 5, reached out to Gow to state that he had been involved in an inappropriate relationship with Holland many years prior. Gow officials spoke with Student 5 about the matter to Student 5's satisfaction at that time. At that point, no legal or reporting action could be taken due to the passage of time given that the alleged incident occurred a decade ago. Holland was also already convicted in relation to the Linden Hill matter at that point and therefore already had a permanent criminal record.

Student 5 initiated contact with the author for purposes of this investigation, but ultimately declined to provide information beyond that which he had previously shared with Gow in the mid-2000s.

(c) Subsequent Convictions

Michael Holland left Gow in 1998 to take a headmaster position at Linden Hill. In 2003, a Linden Hill student alleged that Holland inappropriately touched him while on a school sponsored trip to New York City. Linden Hill reported the allegation to the Massachusetts Department of Social Services and the Office of Child Care Services, who found there to be sufficient evidence to believe that a sexual assault occurred.²¹ Based on these allegations, in 2004, Holland was criminally charged in New York. Holland was ultimately convicted in May 2004 of forcible touching in the third degree, endangering the welfare of a child, and sexual abuse in the third degree.

Also in 2003, another Linden Hill student accused Holland of inappropriately touching him while on campus. After a 2005 trial, Holland was acquitted of a felony charge of sexual abuse in Massachusetts, based on the prosecution's failure to prove the charges beyond a reasonable doubt.

Holland did not respond to multiple requests for an interview, but through an intermediary denied all allegations.

²¹ See <https://www.seacoastonline.com/article/20030523/news/305239977>.

3. Paul Getzel²²

Paul Getzel was employed as an environmental science teacher at Gow from approximately 1997 to 2000.²³

(a) *Craig MacEarchern*

Craig MacEarchern attended Gow from 1996 to 2002. During his seventh and eighth grade years, he resided in Whitcomb Dormitory, and Paul Getzel was one of two dorm masters. MacEarchern said he remembers that Getzel would allow younger students to stay up past the set bedtime watching TV in Getzel's apartment. Getzel would frequently roughhouse with the boys, according to MacEarchern, and on occasion, would tickle other boys or playfully spank them on their buttocks. On one occasion, Getzel was chasing some boys around the dorm, and MacEarchern was hiding behind his door. Getzel pushed it open, and the bottom of the door scraped MacEarchern's big toe and cut it. MacEarchern went to the nurse for a bandage, but did not tell her how he was injured, other than to say that he got his toe stuck under a door.

During an interview, Getzel stated that he does not recall any roughhousing incident with MacEarchern and denies any allegations of roughhousing, tickling, or spanking. Thereafter, Getzel sent the author a letter stating, among other things, that the allegations we discussed are false, and further that he may sue Gow if the author includes MacEarchern's allegations in this report. The author did not receive any allegations of illegal conduct, or of sexual misconduct, by Getzel.

²² Getzel was interviewed. He denied any allegations of rough housing or spanking of any student.

²³ See *supra*, FN 16.

(b) *Conviction after Leaving Gow*

On October 31, 2001, while no longer an employee of Gow, Paul Getzel was charged in the United States District Court for the District of New Hampshire with possession and transportation of child pornography in violation of 18 U.S.C. § 2252A(a)(5)(B) and § 2252(a)(1).²⁴ He pleaded guilty to transportation of child pornography and was sentenced to 41 months in prison. Getzel is now listed on Maryland's Sex Offender Registry. Gow did not receive any reports of alleged sexual misconduct by Getzel either when he was employed or now in response to this report.

4. Shirley Frieh

Shirley Frieh was a part-time nurse at Gow from approximately 1997 to 2000.²⁵ Frieh agreed to speak with the author. She denied the allegations contained herein.

(a) *Student 6*

Student 6 attended Gow for high school in the late 1990s. According to Student 6, Frieh began to pay "special attention" to him shortly after she started at Gow. Student 6 recounted that Frieh provided him with alcohol, as well as unprescribed medications. Student 6 stated that all of his first sexual experiences were with Frieh.

Student 6 recalled that Frieh would sometimes call him to the nurse's office, and they would engage in touching and sometimes intercourse. On many weekends Student 6 was

²⁴ *United States v. Getzel*, United States District Court, District of New Hampshire, Criminal Case No. CR 01-102-01.

²⁵ *See supra*, n. 16.

not permitted to go off campus with other students, pursuant to minor disciplinary restrictions.²⁶ Frieh often worked on the weekends, and Student 6 believes she took advantage of the fact that most students and many faculty were off campus for the day to be intimate with him. Student 6 reported occasions where Frieh said she was in love with him.

While at Gow, Student 6 said he never told anyone at the school about the relationship. Interviews with former faculty and administrators indicated that they were unaware of any relationship. Student 6 did, however, at that time confide in two friends who did not attend Gow about his ongoing relationship with Frieh. In interviews, both individuals remember Student 6 confiding in them about a sexual relationship with the school nurse.

Over the summer, Frieh would meet Student 6 in public places, such as bars. One of those individuals that Student 6 confided in about the relationship, as well as a third person also not affiliated with Gow, stated during interviews that they recall seeing Frieh with Student 6 at a bar off campus during the summer months. Each understood at the time that she was the “woman from Gow” that Student 6 said he was in a relationship with. One recalls seeing the woman’s arms around Student 6’s neck, and that, at that time, Student 6 had not graduated from high school. The other individual recalls seeing Student 6 “make out” with the woman at the bar and witnessing Frieh pick up Student 6 from a friend’s house. The same two individuals positively identified Frieh’s photograph as the woman they recall seeing with Student 6.

²⁶ Being permitted to leave campus on the weekends for various excursions was a privilege students could earn or lose during the week based on both academic performance and behavioral issues.

In an interview with Friehe, she specifically denied the allegations of providing Student 6 with medications or alcohol. She also denied any inappropriate contact with Student 6. When asked directly about specific examples or eyewitnesses' versions of events, she declined to provide any direct response beyond denials.

5. Jack Jackson

Jack Jackson was employed as an English teacher at Gow from 1982 to January of 1992. The author did not receive any specific reports regarding Jackson, except those associated with the lawsuit detailed below.

(a) *Present Lawsuit*

A lawsuit alleging that a former student was sexually abused by Jackson in 1990 or 1991 was filed on March 6, 2020.²⁷

Jackson agreed to speak with the author regarding the allegations contained in the lawsuit. He denies the allegations and denies ever having any sexual contact of any kind with any student ever.

That lawsuit is in its very early stages. The complaint does allege that the former student reported something to a faculty member still employed by Gow. That faculty member denies anything ever being reported to him. That faculty member has been placed on administrative leave while Gow investigates the litigated matter.

²⁷ *John Doe - 18240 v. The Gow School, et al.*, Supreme Court of the State of New York, Erie County (Index No. 803432/2020).

OBSERVATIONS

This Report is part of the Board's effort to understand past events, for the purpose of assessing and improving Gow's procedures and responsiveness to such events. The specific reports—occurring largely between the 1990s to 2002—include allegations of inexcusable behavior on the part of former faculty, as well as conduct that was inappropriate but far less severe. It is important to note that the alleged incidents discussed here were not contemporaneously reported by students, faculty, or parents to school administrators, with one exception. None of the allegations included misconduct on the part of the administration or a systemic failure to deal with difficult situations. Similarly, there is no reason to conclude that administrators should have known about these incidents or that anyone failed to take appropriate actions.

In sum, having spoken with the reporters, as well as many other former students and faculty, no patterns of misconduct or systemic failures were alleged.

There was one exception. Many that I spoke with identified a well-known and generally followed understanding that a dorm master's door should be always open when students are present in the room. Some individuals did recount that on occasion a dorm master would have his door closed when it was required to be open because there were students in the room. It was not uncommon for students to be present in dorm masters' rooms for special events, to watch a movie, or celebrate a birthday. Some former faculty noted that they confronted dorm masters who broke this rule or reported the violation to administration. In the situations discussed in this Report, however, none of the alleged incidents reported were in any way related to a deviation from this practice.

In speaking with the reporters whose allegations are recounted above, almost all of the reports stated that they did not believe anyone at Gow knew of any of the alleged incident(s). Interviews with former faculty, including but not limited to the administrators directly involved, confirmed that administration was not aware of the alleged incidents, aside from the concerns raised by a former student's parents regarding Simmeth in the later 1990s.

In reviewing the files, it does not appear that Gow provided letters of recommendation for Holland, Simmeth, or Friehe. File review indicated that both Getzel and Jackson were provided letters of recommendation by Gow, but when those letters were drafted, Gow had no reason not to, given that the matters discussed herein had not been raised.²⁸

CONCLUSION

While even one instance of improper conduct by a teacher or an administrator is too many, the individuals who came forward each stated that he did not contemporaneously report the alleged conduct to another teacher or administrator, nor did they believe Gow had reason to know of the conduct. Nonetheless, Gow's current administration has reviewed all of the information in this Report and used it to assess critically current policies and procedures. The administration intends to take all appropriate steps to protect against any similar conduct, or any form of teacher or staff misconduct, from occurring in the future.

To the extent there are former students or parents who have not yet contacted the school or its outside independent counsel, but now wish to do so, they should contact Julia Hilliker at (716) 848-1547. All communications will be treated with the same confidentiality as

²⁸ It is possible that records may be incomplete due to the passage of time and therefore other letters of recommendation may have existed.

the reports herein. While no additional formal report is anticipated, Gow looks forward to a continued discussion to provide guidance to its ongoing assessment of its policies and procedures.

Dated: March 27, 2020