



June 27, 2018

Dear Members of the Lawrenceville Community,

We write to follow up on the letter of February 28, 2018, which described our continuing efforts to identify and address past incidents of adult-student sexual misconduct at Lawrenceville. You may recall that we proactively initiated this inquiry in June 2016, not in response to a specific allegation, but based on our belief that having a full and transparent understanding of our past is fundamental to our duty of care for all of our students, both current and former.

As the February letter noted, the Board of Trustees retained independent legal counsel highly experienced in these matters at Debevoise & Plimpton LLP (“Debevoise”) to conduct a comprehensive independent investigation into any reports of past sexual misconduct (the “Investigation”) received after the December 18, 2017 letter to the community, including additional accounts about the four cases of serious sexual misconduct we addressed in that letter.

This Investigation came on the heels of a careful, 18-month-long review of our past led by our regular outside counsel. The results of that review were reported to the entire community in the December letter. All three of the prior letters on this topic can be found [here](#).

As part of the Debevoise investigation, members of the Lawrenceville community who believed they had relevant information were invited to speak with an investigator and share their account. We thank everyone who has done so. Each account enables us to construct a more complete picture of the School’s past, identify actions intended to prevent future incidents, and, most important, apologize to those who experienced misconduct by Lawrenceville faculty and staff.

In fulfillment of our pledge in December to “pursue the truth, wherever it leads us, and keep you informed,” we are now reporting back on what we have learned since then.

To summarize, the Investigation learned of three new incidents of serious sexual misconduct (a term we define below), one from the 1960s and two from the 1970s. None of these were reported to the School at the time. In addition, the Investigation heard accounts from alumni of physical contact by adults that made them uncomfortable. Although the Investigation recognized that these alumni felt uncomfortable and such boundary-crossing behavior would not be tolerated today, there was insufficient evidence to conclude that these incidents rose to the level of serious sexual misconduct. The Investigation also found additional facts, described below, about the four incidents reported in the December letter.

In most of the cases we are so far aware of involving inappropriate behavior that the School knew about at the time, available evidence suggests past administrations reacted decisively when presented with credible allegations of serious adult-student sexual misconduct, frequently terminating the individual. There were cases, however, where the School’s response at the time was less forceful than would be expected if the same conduct occurred today.

As we have indicated in previous communications, we are reporting based on what we have learned to date. If new information emerges that causes us to reassess our current view of the past, we will do so and report it to you.

Our ultimate concern throughout this process has been for students who, at any time, were subjected to inappropriate conduct by adults in our community. Our aim has been to hear and understand what happened and apologize for that conduct.

### **Approach and Scope**

The December and February letters invited individuals with relevant information about prior adult-student sexual misconduct to contact the School or our investigators, or make a confidential report through our anonymous reporting portal. In an attempt to conduct as comprehensive an investigation as possible and target those with possibly relevant information, the School sent outreach letters to the broadest possible group of recipients, regardless of their current relationship with the School or their stated desire not to receive solicitations. The Investigation's outreach included alumni, students who did not graduate, parents of current students, current and former faculty, current and former staff, and current and former board members.

The Investigation carefully reviewed each allegation of adult-student sexual misconduct reported after the December and February letters. Debevoise conducted over 80 interviews and reviewed all the relevant portions of the School's personnel files, records, and archival collection.

The Investigation was necessarily limited in certain respects that are common when investigating long-ago events and when cooperation is entirely voluntary. First, due to the passage of time, many of the people who might have had relevant information are deceased. Second, the School received anonymous allegations that, in some cases, could not be fully investigated because the reporter did not respond to requests for an interview. In such instances, however, Debevoise investigated through documentary sources and other witnesses, wherever possible. Third, Debevoise received information indicating that certain alumni might have relevant information, but while many of these alumni responded and assisted in the investigation, others chose not to. These inherent limitations raise the possibility that there is relevant conduct we do not know about and, again, we remain open to receiving any new or additional information.

The incidents of serious sexual misconduct that are described in this letter are based on firsthand accounts that the Investigation found to be credible. We defined serious sexual misconduct as an act of a sexual or intimate nature between an adult and then-current student—whether a single egregious physical act or a series of less egregious acts that together could have the effect of causing physical or emotional harm.

Except in one case, we have decided not to name the former faculty members implicated by the past incidents. This decision was based on a thoughtful consideration of a wide range of factors and the totality of the circumstances. Key factors included: whether the allegations were raised at the time of the incidents and the faculty member was appropriately dismissed; whether the former faculty member poses a continued risk to students anywhere; whether the former faculty member is deceased; and whether the allegations against the former teacher were corroborated by other allegations of a similar nature or by independent sources of information. You may recall that, in our February letter, we did name one former teacher, Bruce Presley. We based this decision on a variety of factors, including the significant evidence corroborating his misconduct, that he had previously been identified in the media, and the fact that he had not been dismissed by the School.

## **Findings**

### **A. New Reports of Serious Sexual Misconduct**

First, we will report on the three newly-discovered incidents of serious sexual misconduct that have not been described in the previous letters and which came to either our or Debevoise's attention following the December letter. These incidents were not known to the School at the time.

The first incident involved a former teacher and assistant housemaster who taught at the school for two years in the 1960s. We received a detailed, though anonymous, firsthand account through our reporting portal from an alumnus who alleged that the former teacher performed sexual acts on him after encouraging him to drink alcohol. The Investigation determined that the alumnus' report was facially credible, although the allegations have not been corroborated and the alumnus did not respond to our attempts to contact him for an interview. The alumnus reported that he told no one at the time and Debevoise did not find any evidence that the School otherwise knew about this incident. We did not receive any other similar reports about this former teacher. Although the Investigation found no evidence that the School had provided a reference for this teacher, the faculty member departed on good terms and became an active fundraiser for the School for a few years, but no longer engages in such activities. The Investigation confirmed that the former teacher is not currently employed in an educational setting with children and has not been since the 1970s. Debevoise attempted to contact and interview this former faculty member, but received no reply.

The second incident involved a former teacher and assistant housemaster performing a sexual act on a then-current student in the mid-1970s. The former student provided a credible, firsthand account of this incident during an interview with Debevoise. The alumnus told Debevoise that he did not report the incident at the time and Debevoise did not find any evidence that the School knew about this incident or that the former teacher was dismissed for misconduct. We did not receive any other similar reports about this former teacher. The Investigation found no evidence that the School had provided a reference for this teacher. The Investigation confirmed that the former teacher is not currently employed in an educational setting with children, although he had been until recently, and that school has been informed of our findings. Debevoise attempted to contact and interview this former faculty member, but received no reply.

The third incident involved a former teacher who, on multiple occasions during extra help sessions in the early 1970s, touched a student's thigh and genital area, outside his clothing. The victim shared a credible firsthand account of these incidents with Debevoise and stated that he had not reported the incident to the School at the time. Debevoise did not find any evidence that the School otherwise knew about these incidents and no other similar reports were received. This former teacher is deceased.

In addition to these three incidents of serious sexual misconduct, reports were received about alleged misconduct committed by other former faculty members or adult members of our community—some of which were previously known to the School and appropriately addressed, while others could not be corroborated or did not rise to the level of serious sexual misconduct.

Specifically, one former student from the 1950s described an incident with his housemaster in which the housemaster asked the student to sit on the teacher's lap, ostensibly to comfort the student after an upsetting experience with another student. The former student described feeling extremely uncomfortable by this brief encounter. The alumnus said that he reported the incident to one of the school doctors and spent the following few days in the infirmary; we were able to corroborate the infirmary visit. Debevoise did not find any evidence that School administrators knew about this incident and no other alumnus came forward with an allegation about this former teacher. This former faculty member passed away in the

1990s. The Investigation credited the former student’s account and we emphasize that, although the information indicates that the conduct did not rise to the level of serious sexual misconduct, it is completely inappropriate for an adult member of our community to engage in such physical contact with a student and such conduct would not be tolerated today.

Two alumni (one anonymously and one whom Debevoise interviewed) reported that, in the 1960s and early 1970s, a former school doctor performed hernia exams on them in a manner that made them uncomfortable. The Investigation credited that the two former students felt uncomfortable and that those feelings persist to this day. The Investigation was unable to corroborate, however, that the exams were conducted in an inappropriate manner. Debevoise also did not find any evidence that the school doctor was reported to School administrators at the time for inappropriate behavior.

Three alumni raised concerns that a former teacher who taught in the 1970s may have engaged in sexual misconduct, but the Investigation could not corroborate these allegations and two of the reports were secondhand and offered no detail about the alleged behavior. In an email we received following the December letter, one alumnus in particular provided a firsthand account of being subjected to numerous sexual advances by the former faculty member, although did not provide any further detail and did not allege that the advances involved sexual contact. Debevoise did not uncover any evidence that the School received a report about this teacher at the time. This alumnus did not respond to a request by Debevoise for an interview. The former faculty member is deceased.

Finally, we received credible, firsthand reports of conduct by six adults that the Investigation determined crossed healthy adult-student boundaries but did not rise to the level of sexual misconduct. In two of these cases, the School knew about the incident at the time and took appropriate measures to address the situation. In the four other cases of boundary-crossing behavior, the School was not aware of the conduct at the time and discovered it during the Investigation.

## **B. Previously Known Incidents**

In addition to investigating newly-discovered incidents, Debevoise took further investigative steps with respect to the four previously known incidents of serious sexual misconduct that we described in the December letter. These steps were taken after we received additional reports—some of them firsthand accounts—from alumni about the former faculty members in question after the December and February letters. In particular, and as noted in the February letter, several alumni shared firsthand accounts of being subjected to inappropriate discipline by Bruce Presley, a former faculty member and housemaster who taught at Lawrenceville from 1960 to 1984 and whose conduct was described as the “fourth incident” in the December letter. The Investigation yielded further information about the scope of Presley’s conduct and the extent of the School’s contemporaneous knowledge of his inappropriate behavior.

### **1. Bruce Presley**

Debevoise spoke with ten alumni who provided credible, firsthand accounts of inappropriate discipline by Presley in McPherson House, where he served as housemaster from 1976-1982. Based on their accounts, and Debevoise’s interviews with several other witnesses, the Investigation determined that, from at least 1977-1981, Presley offered some students who violated a school rule the option of performing nude exercises in front of him in lieu of other more traditional disciplinary actions, such as loss of weekend privileges, suspension, or expulsion.

Based on the information available to date, it appears the routine may have changed over time—and then stopped altogether. Specifically, victims from the class of 1978 recalled that the nude exercises occurred

in private, with no other student around. In contrast, victims and witnesses from the school years between 1978 and 1981 described these discipline sessions as involving two or more students at a time.

In addition to these inappropriate disciplinary methods, the Investigation determined that Presley also used more acceptable alternative punishments during this time period, such as early-morning runs around the track.

The Investigation led us to the conclusion that senior School administrators knew about Presley's misconduct at the time and likely confronted him. It is possible that these interventions caused Presley to modify his disciplinary measures so that they no longer occurred in private, although there is no documentary evidence of either a confrontation or the apparent modification and the key witnesses are either deceased or did not respond to a request for an interview.

We think it is likely that Presley was confronted because of credible reports that an intervention took place and because, consistent with such a confrontation, the discipline routine appears to have changed and then appears to have stopped. An intervention also is consistent with how the School administration at that time dealt with other instances of misconduct. In several other documented instances, for example, School administrators confronted and terminated teachers engaged in misconduct involving sexual contact. Though Presley's conduct would certainly result in termination today and we in no way condone it, the fact that there is no evidence that it involved inappropriate physical contact may have led the administration at the time to distinguish it from the incidents that resulted in termination.

Consistent with that inference is the fact that Presley's departure from the School in 1984 was voluntary. Based on contemporaneous documentary evidence, it is clear that Presley chose to leave Lawrenceville to devote more time to his work as an author and publisher and that he was not forced out.

Presley was contacted by Debevoise for an interview, but did not respond. One witness who knew Presley well informed us that Presley has a serious medical condition that could prevent him from responding.

In February, on behalf of the Board of Trustees and the School, we met personally with some of the Presley victims from the class of 1978 to listen to their stories and, in May, several of the class of 1978 victims attended their 40th reunion, where they actively participated in a panel discussion about current efforts to promote and maintain healthy adult-student boundaries. The School continues to work with this alumni group to actively explore additional ways to enhance our policies and programming. These engagements have been highly productive and we thank these alumni for their courage and active participation both during the Investigation and at their reunion.

## **2. Other Previously-Known Incidents**

Debevoise received and investigated additional reports from alumni about the other three incidents of sexual misconduct described in the December letter.

The "first incident" involved a former teacher who engaged in "inappropriate contact or attempted inappropriate contact with a student" in the 1960s. Since the December letter, the Investigation determined the identity of the victim, although he did not respond to a request to speak. We also received a credible, firsthand account of this former faculty member entering another student's room at night, after lights-out, waking him, and putting his hand on the student's knee in a way that made the student uncomfortable. As noted in the December letter, this former faculty member was dismissed at the time and is now deceased.

The “second incident” was described in the December letter as a “sexual assault or attempted sexual assault in the form of groping” by a former teacher in the 1980s. Since the December letter, the Investigation determined the identity of the victim, although he did not respond to a request to speak. We also received a firsthand account through our anonymous reporting portal from another victim, who alleged that this former teacher groped him during an extra help session in the teacher’s apartment. He also did not respond to a request for an interview. There is no credible evidence that this former teacher returned to a teaching environment after his dismissal from the School. Debevoise contacted this former teacher for an interview, but he did not respond.

The “third incident” related to a “long-time administrator and coach who had inappropriately touched and kissed” several students, which led to his dismissal from the School and was reported at the time to the State child protective services and investigated. Since the letter, we received additional second-hand reports of similar misconduct, which we were not able to corroborate. This former administrator is now deceased.

### **C. Hazing and Bullying**

Although not within the original scope of the Investigation, a number of the alumni who provided information in connection with the Investigation described being the victims of or witnessing student-on-student bullying. These accounts—most of which relate to conduct from the 1970s and 1980s—are noteworthy because they clearly remain a source of pain and anger years later. That alone makes it important that we acknowledge that bullying occurred and has had long-lasting effects. Many of the reports we heard were part of the so-called “rhinie” system, which were hazing and other rituals imposed by older students on new or younger students. As described by former students, this behavior ranged from relatively benign incidents to more physical, abusive, and clearly harmful conduct. The evidence indicates that at least some housemasters were aware of some of the abusive behaviors.

It is worth noting that the School has worked hard in recent decades to discourage bullying in all its forms, to respond to incidents with clear and swift discipline, and to create programming that promotes mutual respect among students. We have put a much greater emphasis on the training in this area for housemasters and prefects, and Second and Third Formers all participate in mandatory anti-bullying programming as part of our Personal Development Seminars.

### **Conclusion**

We have taken or will take several additional steps in response to these findings. In all cases of serious sexual misconduct addressed in this letter where the former teacher worked at a secondary school institution before or after Lawrenceville, we have contacted the school where appropriate to share our findings. We have also, where appropriate, made reports to the appropriate State agency. Finally, in instances where either our own due diligence efforts or the subsequent Investigation has found serious sexual misconduct, we will no longer recognize those former community members in awards, tributes, or memorial plaques at the School.

The safety and welfare of our students is of paramount concern. That concern is what drove us at the outset to undertake this investigative process. In light of these findings, we are continuing the important work outlined in the December letter to enhance our current policies and procedures regarding self-advocacy and healthy relationships. Our goal is that through a better and more complete understanding of the School’s past, we will ensure a safer environment for our students now and in the future.

In closing, we offer two final and important thoughts. First, on behalf of The Lawrenceville School and its Board of Trustees, we offer a sincere apology to the victims and a renewed commitment to fostering a

community that reflects our core values. Second, we express our deep appreciation for all those who have come forward to share their stories with us. Schools like ours that are committed to the highest ideals must acknowledge their past failings and seek always to improve. While challenging, we believe it is the only way forward.

Sincerely,

Michael S. Chae '86  
President of the Board of Trustees

Stephen S. Murray H'55 '65 '16 P'16 '21  
The Shelby Cullom Davis '26 Head Master