



BY EMAIL

Board of Directors of T.M. Landry
College Prep Foundation
Greg Davis, *president*
Linda Johnson, *vice president*

April 10, 2019

MEMORANDUM

Executive Summary

Couhig Partners was hired by the Board of Directors ("Board") of T.M. Landry College Prep ("T.M. Landry") to perform an independent investigation ("Investigation") of the claims made by the New York Times articles published in late 2018 (the "Articles"). Greg Davis, current President of the Board, explained that his first priority was to have the efforts of the Investigation focus on T.M. Landry's students who are currently eligible for graduation ("Graduating Students"). At the time of the interviews, there were 9 Graduating Students. While the Articles have had and will have other consequences, their timing, in the midst the Graduating Students' college admission process, had the potential to put those students' applications in jeopardy.

Thus, Couhig Partners elected to conduct its Investigation in two phases. The first phase would focus primarily on the information and records related to those Graduating Students. The second phase would involve a broader investigation of the Articles' allegations.

Couhig Partners was able to fully complete the investigation into the first phase. However, it was limited in being able to conclude the second phase of the Investigation. The principal reason was the inability to interview former students who made complaints to the New York Times. Although an effort was made to interview them, they are reportedly represented by an attorney who declined to make them available for interviews or provide supporting documents.

Couhig Partners requested documents from T.M. Landry related to the Graduating Students and requested that the Graduating Students sit for interviews with Couhig Partners. Once student interviews were complete, Couhig Partners requested additional documents and requested that Mike and Tracey Landry sit for interviews with Couhig Partners. Once their interviews were complete, Couhig Partners requested additional documents from T.M. Landry. Thereafter, Couhig Partners reached out directly to several former students, who are currently enrolled in four-year colleges across the United States ("Alumni"), as well as an attorney in Houston, Ashlee

McFarlane ("Ms. McFarlane"), who stated that she represented many former students, parents of former students, and former teachers of T.M. Landry who were interviewed for the Articles.

Additional information requests were made to Mike and Tracey Landry, and Couhig Partners and Paul Pastorek interviewed the school's current faculty and administrator. Couhig Partners and Paul Pastorek also conducted a final interview of Mike and Tracey Landry with particular focus on the abuse allegations contained in the Articles. Greg Davis was present for the interview. After the interview, Couhig Partners requested information from the St. Martin Parish Police Department, the Breaux Bridge Police Department, and the Louisiana State Police Bureau of Investigation. St. Martin Parish provided little information about investigations of alleged abuse at T.M. Landry, and the Breaux Bridge Police Department and Louisiana State Police Bureau of Investigation provided none.

As detailed below, not all students consented to be interviewed and not all document requests were fulfilled.¹ Thus, the data available to the investigators was limited by the lack of participation from some of the Graduating Students, some of the Alumni, as well as the former students interviewed for the Articles. However, several informative interviews were held and multiple sets of documents were received, reviewed, and analyzed for the Investigation.

Paul Pastorek provided oversight and educational direction to the investigative team. In addition, he made an unannounced visit to the school to observe the school's teaching practices and engaged in informal discussions with staff and students. He also participated in interviews of faculty and separately interviewed the Board members and a few other members of the community. Mr. Pastorek's conclusions and recommendations are contained in a separate memorandum to the Board.

Allegations in the Articles

Included in the Articles were (1) allegations that narratives submitted to colleges by students in college essays were false; (2) allegations of falsification of transcripts; (3) allegations that the school invented student accomplishments and student background information for college applications; (4) allegations that T.M. Landry fostered a culture of fear and physical and emotional abuse, including allegations that students were forced to kneel on rice, rocks, and hot pavement, were choked, yelled at, and berated; (5) allegations that T.M. Landry created a cultish mentality; (6) allegations that some students were performing far below grade level; (7) allegations that the school was failing to teach its students beyond administering practice ACT tests; (8) allegations that the high school students took ACT practice tests day after day and sporadically attended classes; and (9) allegations that Mike Landry choked students, slammed them on desks, put a foot on a student's neck, threatened to alter students' grades, attempted to provide a fraudulent transcript, placed an developmentally-delayed student in a closet as punishment, and told students to lie on their college applications.

¹ See pages 21-23, below.

Overall Conclusions

T.M. Landry appears to have been a genuine incubator for success, particularly for self-reliant students willing to put faith in a non-traditional education model. And its value appears to have been most beneficial for students whose potential was disregarded or ignored by their communities or former schools.

The experience described by current and former students was of a school that offered a sense of community, acceptance, and selflessness that was genuinely unique. They also described a staff and administration that instilled a strong sense of self-sufficiency, confidence, public-speaking skills, and other traits that would no doubt benefit any college student. But the current students also indirectly described an overworked administration struggling to do its best to juggle the difficult demands put on itself, particularly when the student body grew substantially in recent years.

There do not appear to be systemic efforts to provide false information to colleges; however, the school appears to have less-than-stellar record keeping, and lack of attention to detail in student records and college applications appeared with some frequency. In most cases, the inaccuracies appear to simply be the result of sloppiness and potentially not calculated to provide the students with any distinct advantage. And in many cases, there simply appears to be a good faith effort to show students in the best light in a competitive college application field.

Allegations of physical abuse were difficult to analyze due to the lack of participation in the Investigation from many individuals, including any of the individuals interviewed for the Articles. However, based on the information available, the Articles seem to give the impression that physical violence was prevalent at the school, while all of the individuals interviewed in the Investigation described no physical abuse and/or limited corporal punishment in the past. On the other hand, kneeling appears to have been a normalized method of discipline or correction. While Mr. and Ms. Landry appear to underestimate the prevalence of kneeling at the school in past years, none of the students or teachers interviewed indicated that they felt the practice was humiliating, painful, scary, or otherwise disturbing. Further, based on the comments of the students interviewed and the Landrys, the practice may have been limited to those students whose parents authorized the staff to use that disciplinary method.

Additional conclusions and details of the Investigation are provided below.

T.M. Landry's Graduating Students and Alumni

- **Conclusion**

At this time, Couhig Partners has received no information in the course of its Investigation that indicates that T.M. Landry's Graduating Students are not prepared for college. In fact, by the objective metrics available and based on interviews with five of the Graduating Students and two

Alumni, the interviewed students appear to be self-reliant, confident, intelligent, truthful in their representations in their college applications, and prepared for college.

In addition, based on interviews with two Alumni who graduated in recent years, both appear to be doing well at prestigious universities, both stated that the Articles did not represent their experience at T.M. Landry, both believed that T.M. Landry prepared them and their peers for college, and both stated that they never witnessed any physical or emotional abuse similar to the allegations described in the Articles.

- **Summary**

The five Graduating Students interviewed by Couhig Partners ranged in age from 16 to 18. By all indications, all five presented a confident demeanor and spoke intelligently and casually about themselves and their experience at T.M. Landry. All five students stated that they felt prepared for college, and all of them gave the overall impression that they are bright, self-assured, organized, and impressive college candidates.

All five Graduating Students remarked on the focus on accountability at T.M. Landry, indicating that the expectation is on the students to plan their schedules, study independently throughout much of the day, and otherwise be largely self-reliant in fulfilling their academic obligations and seeking help from teachers. Some of the Graduating Students indicated that they understood that this may be a reason that not all students may excel at T.M. Landry. Some even made comments that they believed this may be a reason that some of the students interviewed for the Articles held low opinions of the school (because the T.M. Landry model was not a good fit for those other students).

All five of these Graduating Students interviewed stated that they had taken the ACT exam on multiple occasions, and all of these Graduating Students stated that they showed considerable improvement in the process and ultimately received above-average scores. They explained that all of those ACT exams were taken at colleges or other high schools (never T.M. Landry) and all of the test-taking facilities strictly administered the exams to these Graduating Students (as well as non-T.M. Landry students), with proctors and CCTV cameras overseeing the process. Several of these Graduating Students credited T.M. Landry with enabling them to improve their scores and/or ultimately receive above-average scores on the ACT exam.

Several of the five Graduating Students interviewed, and others who were not interviewed, had completed Dual Enrollment Classes at the University of Louisiana at Lafayette ("ULL"). Of the nine Graduating Students for whom student records were provided, eight of the students had apparently completed Dual Enrollment classes at ULL, with many of the students receiving average or very good grades in those college-level courses. In some cases though, it was difficult to verify the accuracy of those records because the documentation provided by T.M. Landry to the investigators was incomplete and the investigators were told that the school cannot access the records of students who have since left T.M. Landry. One interviewed Graduating Student explained that the student had received the highest grade in a Calculus course among the high

school and college students attending. The student's mother confirmed that was accurate. (The investigators were also provided a copy of a letter of recommendation from a ULL teacher who spoke effusively about a past T.M. Landry student who was one of the highest-performing students in that semester's Pre-Calculus course.)

All five of the Graduating Students interviewed stated that they received no coaching or encouragement to stretch the truth on their college essays or other college application materials from T.M. Landry teachers or administrators. The five Graduating Students generally confirmed the accuracy of the "Honors" and "Activities" listed on their Common Applications by providing details about those clubs and organizations.

The Graduating Students stated that this is not their first experience with what they felt was unwarranted criticism of T.M. Landry. All five Graduating Students explained that they have heard unsupported and vague rumors for years accusing T.M. Landry students of cheating on the ACT. Several or all of the Graduating Students explained that they believed that the accusation—which they strongly denied—was that T.M. Landry administered the ACT exam to the students at the school and provided the answers to the students. Some of the Graduating Students explained that they have taken the practice ACT at Saturday tutoring sessions at T.M. Landry, even in conditions that tried to mirror the experience of sitting for an ACT exam, but that those practice tests were merely for preparation and could not have and would not have been submitted as the students' formal grade for submission to colleges.

Multiple Graduating Students explained that, in an attempt to quell the unsupported rumors of cheating, T.M. Landry began urging its students to sit for the ACT exam at Louisiana State University ("LSU") because, in addition to being a comfortable setting to take the exam, it was outside of the T.M. Landry community and the exam is strictly administered. However, all of the Graduating Students indicated that they have sat for the ACT exam in multiple locations (e.g., LSU, ULL, Carencro High School, and Infinity College), representing that all of the test-taking facilities strictly administered the exams to these Graduating Students (as well as non-T.M. Landry students) with proctors and CCTV cameras overseeing the process.

- **Alumni Interviews**

The two Alumni interviewed provided positive comments about T.M. Landry; credited it, at least partially, with their success; and generally felt that the Articles did not reflect their experience at the school.

One of the Alumni stated that he attended the school for six years and, when he began at T.M. Landry was three grade levels behind. He credits T.M. Landry for catching him up quickly despite difficulty at home and singled Mike Landry out as an individual who made the experience easier for the student because Mr. Landry had experienced a similar home life as a young person. The student is currently maintaining an above-average GPA at a well-respected four-year college, and he stated that he gives T.M. Landry's leaders the majority of credit for his success.

Both Alumni confirmed that, to their knowledge, all graduating students in their graduating years were accepted to four-year colleges. Both felt that T.M. Landry prepared them and their peers for college. Both Alumni stated that attendance was required at the school and students attended school regularly, with one of the graduates adding that a student could not simply coast through courses at the school.

With regard to the allegation that students were performing below grade level, one of the Alumni stated that, if that was the case, he did not feel that it was due to any failing of school's staff but could be attributable to other factors. The graduate added that the school is non-traditional, and he feels that it was a challenging school with heavy workload.

Neither of the Alumni felt that the school tested the ACT too much or that students only knew subject matter contained on the ACT.

Both of the Alumni stated that they never felt scared of Mike Landry or any other teacher or administrator at the school. Neither witnessed any physical abuse. Neither witnessed any teacher or administrator threatening to change a transcript or prevent a student from being accepted into a college. Neither felt that the school seemed like a cult.

Both of the Alumni felt that grades were applied fairly at T.M. Landry. Both felt that their transcripts were an accurate representation of the courses they completed at T.M. Landry.

- **Faculty and Administrator Interviews**

On March 19 and 20, Couhig Partners and Paul Pastorek interviewed T.M. Landry's administrator and five teachers. The interviews provided a comprehensive look into the school's daily administrative activities. The information received during this round of interviews was, for the most part, consistent with the information discovered during the earlier stages of the Investigation.

T.M. Landry's administrator is responsible for office management, collecting and maintaining student records, and aiding the school's faculty and principals. The administrator has been employed by T.M. Landry since October 2018, although she volunteered with the school for one or two years before that. The administrator's responses to questions related to record-keeping were limited to her job function, which is to organize the records. The administrator is not responsible for creating or inputting information into transcripts or other records.

Overall, the administrator's observations about the school's methods and policies were positive. The administrator believed that the students were receiving a top notch education. She stated that she had not witnessed any student being yelled at, berated, asked to kneel, or struck in any manner. The administrator had not ever witnessed any student being encouraged to embellish details on a college application or essay. The administrator has chaperoned students who travelled to LSU and other universities to take the ACT. The administrator has never witnessed or had any suspicion that students were cheating on the exam.

For the most part, the teachers' education and background, teaching experience, and responses to questions about methodology, discipline, and cheating allegations were similar. With the exception of one teacher, all of the teachers have a master's degree in their area of expertise. Four of the five teachers had minimal teaching experience before working at T.M. Landry; one of the teachers had no previous teaching experience. None of the teachers is certified as a teacher. None of the teachers has been employed by T.M. Landry for more than 18 months.

Each teacher's method of teaching was similar: students are divided into small groups based on skill level; new concepts are introduced by lecture or a group project; and students are evaluated by both oral and written examination. Each teacher confirmed that they do not assign grades to students. Instead, a student is permitted to move forward with a new topic when the teacher feels the student has mastered the topic. Each week, the teachers provide a written report to Mr. Landry describing the materials covered, assessing the students' performance, and logging each student's attendance. Most teachers believed Mr. Landry assigned letter grades (for the purpose of creating a transcript) based on these reports and other informal assessments of the students' performance in the subjects taught.

The teachers who taught core classes, as opposed to elective courses, responded that the majority of their students tested at or above their grade level. The teachers based their opinions on in-class evaluations of the students and recent TerraNova test results. They stated that students who tested below grade level were recent transfers to T.M. Landry. Additionally, one student who transferred to T.M. Landry three years ago was approximately three grade levels behind and was learning letters when the student should have already learned to read. Although the student still tests below grade level, the student has apparently made great strides and continues to improve.

Four of the five teachers interviewed acknowledged that kneeling had been used to correct undesirable behavior in the past. Some of the teachers agreed that they had used the technique in their classrooms. Those teachers stated that students had never been asked to kneel for more than two to five minutes. They also agreed that the technique was not used to hurt, embarrass, or humiliate the students, but to quickly address disruptive or objectionable behavior. These teachers felt that the technique was effective. Two teachers stated they believed that kneeling was part of Southern culture. The four teachers who affirmed that students had been asked to kneel stated that the practice is no longer being used. Three of the teachers interviewed stated that lower-school students were never asked to kneel. One teacher denied witnessing any student being asked to kneel at T.M. Landry.

None of the teachers have seen a student being yelled at in such a way that would give them cause for concern. Three of the teachers interviewed stated that lower-school students are not yelled at. The teachers seemed to agree that the upper-school students are yelled at on occasion in an effort to correct objectionable behavior or to get a student's attention. One teacher stated that yelling is not used to punish students. The technique is used in the same way that a football coach yells at his players. Another teacher said that the school was "really normal," and the teacher had not witnessed anything that would be considered out of the ordinary.

The teachers interviewed have not ever witnessed a student being asked to cheat or lie on a college application or essay. Most of the teachers stated, however, that they would not be privy to that sort of event because guiding students through the college application process is not within the scope of their responsibilities at the school. Finally, none of the teachers had ever heard of any T.M. Landry student cheating on the ACT.

T.M. Landry's Methodology and Model

- **Conclusion**

T.M. Landry clearly relies on a non-traditional education model borrowing from multiple educational styles, including Montessori, dual enrollment, peer-to-peer teaching, and project-based learning. Some of the styles are implemented well, others may need refining. But, T.M. Landry appears to have had very good success with the limited resources it has.

The T.M. Landry model appears to rely heavily on the accountability and self-reliance of its students and appears to be demanding or too demanding of its teachers, particularly Mike and Tracey Landry. Because of the demands on its teachers and administrators, who may have genuine and good intentions, it appears possible that gifted and gritty students may be thriving while struggling students, particularly in the lower grades of the school, may take more time to make progress. Additional information would likely be needed to assess this area, but it appears that T.M. Landry's model relies on the expectation that once students join the school, they will continue with the school until they graduate. Thus, the model may, to some degree, be more focused on how students are performing at the higher grades of the school because the expectation is that a foundation will ultimately be laid for younger students and the students will meet or far exceed expectations by their senior year.

Thus, it appears that the school may well be a genuine incubator for success, but it appears that it may have also been a poor fit for some students, particularly some with special needs.

- **Graduating Students' Descriptions of Their Experience at T.M. Landry**

All five of the Graduating Students gave some insight into the T.M. Landry model and the daily routines of the upper-class students at T.M. Landry. All five of the students confirmed that T.M. Landry applies a mix of traditional teaching models (particularly in language classes), online-course education through EDX, and project-based learning. There seems to be a variety of methods to evaluate students in different classes, with some of the Graduating Students indicating that tests are periodically given in some classes, with grades administered and at least one student explaining that there are "no grades" at T.M. Landry because low grades can be "too discouraging." However, educational expectations are set, and students are evaluated by teachers based on mastery of those expectations (see later discussion).

With regard to the autonomy allowed to students, it appears that high school students are given wide latitude in setting their schedules. Some students explained that they generally know their schedule for a given week, and other students explained that they are expected to create their schedule anew every school day by gathering into groups of students and approaching different teachers at the school to check the teachers' availability to teach that group of students a particular subject. The Graduating Students interviewed generally indicated that they had no problem with this flexible form of scheduling classes and felt that it prepared them better for college.

The five Graduating Students generally confirmed that T.M. Landry's students are expected to attend school year-round and on Saturdays, when tutoring sessions are open to T.M. Landry students and are free to the community, with some T.M. Landry students acting as the tutors.

The Graduating Students and Alumni interviewed all spoke highly of the T.M. Landry model and at least partially credited it with their success. Several Graduating Students felt that the amount of ACT testing had been grueling during periods of their tenure at T.M. Landry, but they felt that it was the reason for their ultimate success with the exam. None of the Graduating Students or Alumni interviewed were critical of the school's reliance on EDX courses, open-discussion learning, student-to-student tutoring sessions, or dual enrollment courses for their education.

Most or all of the Graduating Students interviewed were defensive of T.M. Landry, felt that the Articles mischaracterized their experience, and expressed exhaustion with what they felt was unfair criticism levied by the Articles and others in the community.

- **The Landrys' Explanation of the T.M. Landry Model**

Based on the statements in the interviews with the Graduating Students and the Landrys, the schools' original mission and methodology were apparently strongly influenced by Mike Landry's feeling of responsibility for African American children, and particularly at-risk boys. T.M. Landry, we were told, wanted to create an environment that could educate those students while not discouraging them and, most importantly in some respects, never giving up on them.

Based on the interviews, it appears that the school has experienced some shift in its paradigm in recent years as its students experienced greater success: the number of students increased considerably, and the type of students changed from, what Mr. Landry characterized as, only "troubled black men" to a more diverse student body with parents from more diverse economic and racial backgrounds.

Tracey Landry stated that the school's model is a mix of Montessori teaching and project-based learning. Mike Landry cited several sources that he has pulled from as inspiration for T.M. Landry's methodology, including Brown University, Harlem Children's Zone, Avenues, AltSchool, St. Ann's School and KIPP academies, among others.

Mike Landry indicated that a number of the procedures used by T.M. Landry were inspired by suggestions received from other educators at conferences around the country, including the school's method of assigning class rank and their non-traditional grading system. In his interview, Mike Landry was, in some cases, unable to identify the names of individuals who suggested that the school follow specific procedures.

Both Mike and Tracey Landry stressed that they believe that the first priority of T.M. Landry's teachers and staff is to instill "self-confidence and self-love" in every student who enrolls in the school. They indicated that they see this as the necessary foundation of education for their students. Mike Landry stated that one of the ways that T.M. Landry creates confidence in students was through constant positive reinforcement.

One of the Graduating Students interviewed volunteered that she was a very shy, quiet student for quite some time, but she believes that the morning meetings held at T.M. Landry helped her to become less shy and greatly improved her public speaking skills. She explained that she disagrees with the Articles' cult-like, negative description of the morning meetings.

Regarding the school's mission, Tracey Landry stated that the school is open to all students with the desire to learn. The school is racially diverse, and there is no entrance examination. Once the student is admitted, Ms. Landry and the other teachers determine a new student's grade classification as they get to know the student. As assignments are completed—including worksheets from a grammar workbook and the like—she and the other teachers determine "where [the student] fits."

Teaching techniques were also discussed. Ms. Landry stated that new concepts are introduced via lecture. After the lecture has been given, the student is given time to "master" the concept on their own. When the student is ready, he or she will "sit with the teacher" to determine whether he or she has mastered the subject before moving on. Ms. Landry provided an example of how a course like American History is taught. First, the students may watch a documentary about a particular historical event. After that, there will be a round table discussion about the documentary and subject matter. If a student feels comfortable with the material, he or she may come sit at the discussion table to participate in the conversation. If the student is not yet ready to demonstrate what he or she has learned, he or she may be seated further from the discussion table until he or she is ready to participate in the conversation. The student is evaluated based on participation and essays prepared in connection with the lesson. According to Ms. Landry, Mr. Landry "decides whether they get a grade."

The school's model seems to place a monumental burden on Tracey and Mike Landry, who are apparently either at the school or available to the students by phone and email until 1 a.m., seven days a week. The interviewees confirmed that students are expected to receive tutoring (or tutor other students) on Saturdays and attend school throughout the calendar year, with high school students often arriving early in the day and staying until 6 p.m. or later.

Mike Landry explained that he is responsible for evaluating the students, with the help of the teachers and Tracey Landry, to determine how the students are graded. He indicated that the teachers cannot fully evaluate the students alone because Mike Landry is the one working with the elite schools, so his assistance is needed to determine what those schools are looking for. Mike Landry apparently administers many of the school's tests, but acknowledged that he does not administer computer science, English, or foreign language tests because he does not have the expertise that the other teachers have in those areas.

Mike Landry explained that much of the testing involves discussion and verbal presentations by students and stated that he will often find tests through the EDX service and administer (or have the teachers administer) those to the students.

The school focuses heavily on autonomy and puts a very strong expectation on the students to be responsible for their schedules and in many ways their own education. Students are also expected to clean the school, tutor younger students, speak up if they feel that they are falling behind, and, importantly, not seek academic help from their parents or guardians.

- **“Mastery,” Grades, and Transcripts**

With regard to grading students, Mike Landry explained that the school does not issue grades in the traditional sense. He explained that the school focuses on “mastery,” and determination of a students’ mastery of a class is made by the teachers working with Mike and Tracey Landry. Mike Landry further explained that he will work with individual teachers to determine which concepts a student should know and students are told those concepts they will need to master. Students are then asked questions or encouraged to participate in discussions with the class regarding those concepts.

The Landrys stated that emails are exchanged between teachers and the Landrys on a weekly basis providing updates on individual students’ progress levels in a particular class, as well as whether each student requires a more rigid schedule or should be allowed to maintain their current level of autonomy. Examples of such correspondence were requested from Mr. Landry and an email was received confirming this evaluation method.

According to Mike Landry, if the teachers and administrators determine that a student has mastered a course, the student receives an “A.” If a student has not yet mastered the course, the student can continue taking the course until they have been determined to reach “mastery” level, or they can accept a lower grade and move on to other courses. Tracey Landry stated that in many respects the ACT stands as the test of mastery for students in the upper classes. She also explained that in many cases EDX courses are pass/fail for the students and a failing grade is not reflected on (“does not wind up on”) the student’s transcript.

With regard to transcripts, the explanations received from Mike and Tracey Landry were somewhat inconsistent. Tracey Landry explained that transcripts are not maintained by the school for individual students and are created when students transition to a new school or

graduate. She explained that Mike Landry would create the transcript when the student left or graduated but stated that the transcript would be accurate and based on the emails sent between the teachers and the Landrys that evaluated the student's progress.

Conversely, Mike Landry explained that each student at the school has a transcript, but it is not maintained in hard copy in each student's file. He explained that it is maintained in an online account with myhomeschooltranscripts.com that the school has access to and for which the school pays a fee. Documentation was requested and very limited documentation was received on this subject. He also explained that T.M. Landry has a software person working on a transcript portal that the school will use in the future.

Mike Landry explained that the students do not receive report cards, but the administrators sit down with parents periodically to discuss the students' progress.

According to the documentation reviewed, five of the six Graduating Students' college applications indicated that all of those students' courses were "Honors" classes, with the exception of one student. All of that sixth students' courses were apparently "Advanced" courses. However, Tracey Landry indicated that it was likely a clerical mistake and the student's application should have indicated that the student's courses were Honors courses. The Landrys and several Graduating Students stated that T.M. Landry offers Honors and non-Honors courses. One Graduating Student stated that all courses at T.M. Landry were Honors courses. None of the nine T.M. Landry student transcripts reviewed included any information identifying classes as "Honors" or "Advanced."

All interviewees were consistent in their comments about the students only taking the ACT exams at proper testing facilities under ordinary test-taking conditions. However, there seemed to be some inconsistency in the comments made by the students interviewed and the Landrys with regard to practice ACTs at the school. Some of the students interviewed indicated that they had taken some form of the practice ACT so often that they could hardly endure more testing. Other Graduating Students and the Landrys explained that the school does not take practice ACTs much more than other schools, with practice ACT testing increasing in the weeks before the students take the formal ACT exam. (However, Mike Landry did state that "years ago" they gave practice ACTs "a lot," but he stated that he curtailed that practice because he felt that the students' grades were not reflecting that it was beneficial to use a substantial amount of practice ACTs.)

At least one Graduating Student defended the school, stating that other schools put a heavy focus on the ACT or other standardized tests, but that T.M. Landry gets unfairly singled out for it. Several of the interviewees stated that T.M. Landry requires community service hours of its students, but the Landrys and the two students who commented on community service hours all cited different numbers for the school's total requirement (between 80 and 120 hours). However, regardless of the number, all four interviewees stated that the students have no issue with meeting the school's requirement between tutoring sessions, food drives, community outreach, and other activities.

Both Mike and Tracey Landry cited multiple considerations that make up the rubric for determining a student's GPA or class rank. Tracey Landry stated that the administrators consider community service work, ACT exam scores, dual-enrollment-class grades, grades at T.M. Landry, and the university that the student is accepted into. Mike Landry confirmed that the analysis for the GPA and/or class rank considered multiple variables.

According to Mike Landry, the Articles attempted to mischaracterize the number of T.M. Landry alumni who have dropped out of college. Both Mike and Tracey Landry confirmed that 100% of T.M. Landry's graduating students are accepted into 4-year colleges. Mike Landry consulted a spreadsheet that he maintains of T.M. Landry alumni, which stated that, since 2013, three alumni have graduated college, 34 alumni are currently attending college, seven have "quit" college, and one student went on medical leave, with the intent to return to college. Mr. Landry provided a redacted copy of that spreadsheet to Couhig Partners.

Allegations of Abuse, Supplying Fraudulent Information, and Failing to Teach

- **Conclusion**

Couhig Partners did not discover any direct evidence of systemic physical abuse of students by teachers or administrators at T.M. Landry. All of the Graduating Students and Alumni interviewed stated that they had never witnessed any teacher or administrator at T.M. Landry punch, kick, spank, choke, or otherwise strike a student. Similarly, Mr. and Ms. Landry largely denied that any students have been spanked, choked, or struck at T.M. Landry. In cases, discussed below, in which they acknowledged the use of corporal punishment, they were quick to point to a relative that authorized the punishment or an intervening circumstance that they believed minimized the seeming outrageousness of the punishment. At times, Mr. and Ms. Landry's responses to questions about kneeling, yelling, and discipline were inconsistent with responses provided by students, particularly on the subject of the amount of kneeling required at the school in past years. And the Investigation would have certainly benefitted from the opportunity to speak to and review documents from individuals interviewed for the Articles, whose allegations apparently offer a stark contrast to the experiences of the Graduating Students and Alumni interviewed, but again, Couhig Partners's requests to their attorney were declined.

Based on the interviews with the students, kneeling appears to have been ubiquitous enough to be seen as absolutely ordinary, though the practice appears to have been limited or stopped since the Articles. However, none of the students interviewed gave the impression that the student body found the practice to be humiliating, painful, or destructive.

Based on the interviews and objective measures (for example, ACT exam scores and Dual Enrollment grades), there appears to be no doubt that there is quality learning taking place at T.M. Landry. However, based on the information gathered so far, it seems that the school may focus more attention on the success of its high school students, which could potentially have an effect on some elementary school students. In addition, the accountability-focused model may not

have served all students well, particularly those students who have not mastered the self-reliance necessary to manage their own schedule and workload without the one-on-one attention that may be available at other, more traditional schools.

All of the interviewees denied that T.M. Landry students fabricate information for their college applications, and the documents provided do not indicate a systematic, intentional effort to fabricate information. However, the use of nearly-identical language in recommendation letters for several students and a disproportionately positive class-ranking system raise concerns, as do minor errors on certain records and a generally less than complete record-keeping system. All of the discrete items taken separately appear to be largely insignificant, potentially unimportant to an admissions officer, and appear to be explained by mere sloppiness of the overworked individuals preparing the applications. However, they also leave the administration open to attacks by critics who could see something worse than mere sloppiness. Worse, when questioned about the information, Tracey and Mike Landry sometimes provided explanations that were contradictory.

- **Allegations regarding Kneeling and Physical Abuse**

In their interviews, the Graduating Students strongly denied the allegations in the Articles that T.M. Landry has a cultish atmosphere with prevalent emotional and physical abuse. None of these Graduating Students has witnessed any student being spanked, choked, struck with a hand, foot, or object by a teacher or administrator at T.M. Landry. None of the students has witnessed any student kneeling on rice, and two or more joked that the school “can’t afford rice” or that Mr. Landry “wouldn’t waste rice” on kneeling. The Graduating Students interviewed also laughed off the idea of students kneeling on hot rocks. However, one student interviewed indicated that it was possible that a student would have been asked to kneel outside, when classes were held outside at the school’s previous facility, but denied the characterization of kneeling on “hot rocks.”

All of the Graduating Students interviewed have been required, during their time at T.M. Landry, to kneel for between five and ten minutes at least on one occasion as a disciplinary measure. Requiring students to kneel for an indeterminate amount of time appears to have been such a regular disciplinary tool at T.M. Landry, particularly by Mr. Landry, that it has been seen as normal and expected as a response for everything from minor math errors to serious behavioral issues.

While one of the Alumni interviewed had also knelt, the other graduate interviewed stated that the student was not asked to kneel because that student’s mother did not authorize the school to use kneeling as a disciplinary measure for that student and the school knew of and respected that decision. All of the Graduating Students and Alumni interviewed stated they did not feel humiliated, fearful for their safety, that it was an unacceptable form of punishment, or that it was an otherwise painful experience.

Tracey Landry denied that any T.M. Landry student has ever been choked or struck with a hand, foot, or object. Ms. Landry stated that she had seen one student spanked at T.M. Landry. The student was spanked by his mother, who was a teacher at the school. Ms. Landry was aware of the

incident that occurred in 2012-2013, in which Mr. Landry spanked a child at the request of the child's mother. Ms. Landry was also aware, but not present for, a situation that arose in 2016-2017 when Mr. Landry grabbed a student by the hood of his sweatshirt. The student was chasing another student with a broom, and Mr. Landry pulled the student's sweatshirt to stop the interaction and prevent the students from injuring one another. Police were involved in both the 2012-2013 and the 2016-2017 incidents.

Ms. Landry acknowledged that students have been asked to kneel in the past, but denied that the technique is still in use. Ms. Landry stated that the practice was discontinued in the early part of 2018. She stated that when students were asked to kneel in the past, they would do so for 2 to 3 minutes. According to Ms. Landry, a student would kneel for 10 minutes at most.

Ms. Landry stated that students are no longer asked to kneel because it was determined to be less effective than other disciplinary methods. She explained that, in its earlier years, the student body was composed of at-risk youth. T.M. Landry was a last resort for students—mostly boys who would otherwise be bound for jail, according to Ms. Landry. The student body has changed, with students coming from more diverse economic and racial backgrounds. She explained that asking a student to kneel does “not make a difference—taking electronics hurts more.”

In contrast, several Graduating Students stated that they were asked to kneel for up to 15 minutes, and more than one stated that it was not unusual for Mike Landry to ask a student to kneel for an indeterminate amount of time and then, after a short period, tell the student to stop kneeling. The students stated that there were instances in which Mr. Landry would tell a student to kneel for an indeterminate amount of time, but then, because of the countless tasks asked of him in a given day, he would leave the immediate area while the student was still kneeling. The students indicated that this was not unusual, but also was not seen as problematic either, indicating that the surrounding students would simply tell the kneeling student that Mr. Landry probably forgot, so they could get up again. The student would get up and there would apparently be no repercussions for doing so without Mr. Landry's permission. Mr. Landry, on the other hand, denied that he would ever tell a student to kneel for an indeterminate amount of time or forget about a student kneeling whom he had asked to kneel.

Mr. Landry denied that he has ever witnessed or participated in the choking, striking, or dragging of a student. He denied that he has ever stepped on a student's face or throat. He denied that he has ever slammed a student on a desk. Mr. Landry denied that he has ever “locked a child in a closet,” although he noted that a special needs student was moved to a large storage room during a seizure to help the child recover and calm down in a quiet space. Mr. Landry's recollection of the incidents that occurred in 2012-2013 and 2016-2017 were consistent with Ms. Landry's account of the same events. In the earlier incident, for which he pled guilty, he stated that the student's mother has asked him to spank the student, but that the grandparents brought charges when they heard about the punishment.

On March 27, 2019, Couhig Partners and Paul Pastorek conducted a final follow up interview with Mr. and Ms. Landry to discuss specific allegations of abuse in the Articles. Greg Davis was present for the interview.

During the interview, Mr. Landry acknowledged again that he pled guilty to charges of spanking a student in 2012. He admitted that he spanked the student at the student's parent's request. He denied choking the student, slapping the student, or forcing the student to eat rat feces. Mr. Landry stated that it is no longer appropriate to spank students, and T.M. Landry is in the process of adopting new policies that completely eliminate corporal punishment in any form.

Mr. Landry also re-addressed the 2016-2017 incident wherein a child was grabbed by the hood of his sweatshirt. That student was chasing another student with a pipe. Mr. Landry grabbed the student to prevent him from hurting anyone. Mr. and Ms. Landry commented that this student came to T.M. Landry as a last resort. The student's behavioral issues were the source of the student's dismissal at other schools. Ms. Landry showed Couhig Partners and Paul Pastorek texts from the student's mother in January 2017 that read, "Just another reason we love this school...."

Mr. Landry denied that he coerced students into saying they did not witness abuse at TM Landry. To the contrary, Mr. Landry stated that he encouraged students to go to the police station and assist the police in any investigation that might be pending. Mr. Landry added that he is not aware of any open investigation and that he has not been contacted by any authority in connection with an ongoing investigation. Mr. Landry believed that students may be retracting their previous statements about the lack of alleged abuse at the insistence of former T.M. Landry teachers who have started their own competing school.

Mr. Landry admitted that he put students in a 40-gallon plastic trash can, but not as described in the Articles. Mr. Landry said he initially put his grandkids in the trashcan and let them pretend they were Oscar the Grouch from Sesame Street. According to Mr. Landry, other kids thought this game with his grandkids was funny, and asked to be put in the trash can, too, so they could play the role. Mr. Landry denied that the students were put in the trash can as a form of punishment or to embarrass the students.

In response to the allegation that Mr. Landry put a developmentally delayed student in a closet to punish him, Mr. Landry denied the allegation. The student in question would sometimes become annoyed by the din of the student activity in the open classroom atmosphere. Mr. Landry would bring the student into a quiet room with other students to play with in order to calm the student down. In the particular instance referred to in the Articles the nearest place to bring the student on that day was supply room. The dimensions of the room were measured by Greg Davis recently and was 19 feet x 5.5 feet. In this particular instance, Mr. Landry says that there were other students in the small room with the door open who were studying quietly or playing with the student. After the student was relaxed he was brought back into the regular school setting.

Mr. Landry admitted that students had been asked to kneel and do "wall sits" in the past, but never for more than a few minutes. He said that kneeling and "wall sits" were discontinued after

the Articles were published. Mr. Landry admits that he has yelled at students, as discussed in greater detail below. In his view, the manner in which he speaks to students was designed to harden them against the challenges they would experience in the real world. Mr. Landry explained that disciplinary measures such as kneeling, wall-sits, and yelling were not used as a punishment, but rather to snap children back into attention.

- **Allegations of Emotional Abuse**

Couhig Partners' interview of the Graduating Students and Mr. and Ms. Landry did not reveal any evidence of emotional abuse. Everyone interviewed acknowledged that students had been yelled at in the past, but all indicated that the yelling did not rise to the level of bullying or intimidation. It was apparent that Mr. and Ms. Landry have historically taken an assertive, often times "coach-like" approach to correcting behavioral and academic issues.

The Graduating Students and Alumni interviewed by Couhig Partners denied witnessing or being the subject of emotional abuse or brainwashing. Most felt that any yelling or discipline directed toward a student was done out of concern for the student and not anger. The students interviewed seemed protective of Mr. Landry and his methods. Mr. Landry was compared to a father figure on more than one occasion. One student stated that "Mr. Mike didn't give up on him." He also stated that when someone pushes you in the right direction, you want to make that person proud. For most students at T.M. Landry, the student said, that person the students want to make proud is Mike Landry.

Ms. Landry indicated that she saw no issue with the use of yelling as a disciplinary measure before the Articles were published. Similarly, Mr. Landry noted that coaches often use yelling to get through to students and it was generally seen as non-problematic in that context. Ms. Landry stated that students had been yelled at in the past. She said that yelling was used to show passion and disappointment, not to frighten or debase students. Ms. Landry said that the school consciously eliminated yelling after the Articles were published. She stated that, although the parents had no issue with the technique, T.M. Landry could not risk another misunderstanding about yelling.

Mr. Landry indicated that he believes that the students liked being yelled at, because it helped them reach their goals. Mr. Landry stated that the students asked him to yell at them like a coach. Mr. Landry said he has had students tell him that they did well because Mr. Landry "went off on them." Mr. Landry clarified the phrase by explaining that he would tell a student that the student was "black, poor, and aren't gonna make it." The student would later tell Mr. Landry that the student was doing well because Mr. Landry treated him like he was special, apparently citing the passionate encouragement Mr. Landry had offered.

- **Allegations of T.M. Landry Failing to Properly Teach its Students**

The Graduating Students interviewed by Couhig Partners appeared to be bright, well-spoken, and confident. Each student interviewed spoke intelligently about their academic careers and their

experiences at T.M. Landry. Although the school takes an intentional departure from traditional forms of education, the information and documentation provided indicated no clear evidence that T.M. Landry was failing to properly teach its students. All interviewees confirmed that the fundamental courses, such as English, mathematics, history, and science are learned by all students. Some of the Graduating Students interviewed had enrolled in courses at the University of Lafayette. These students largely received above-average grades in those college courses.

Mr. and Ms. Landry both mentioned that the school was beginning to administer the TerraNova exam (also known as the CAT test) to evaluate student placement, understanding of core concepts, and seemingly to quell allegations that the younger students are not being taught basic skills like reading and writing. Mr. Landry stated during his interview that 25-28% of students tested above grade level, 51% tested at grade level, and 12% tested below grade level. Mr. Landry also stated that the students who tested below grade level were newer students who were several grades below level when they joined T.M. Landry.

Mike Landry explained that more recently T.M. Landry has expanded the use of TerraNova testing of 3rd through 8th grade students. Couhig Partners was provided a copy of redacted TerraNova test scores for 37 students from third through eighth grade. Of the 37 students tested, 27% scored above average, including one eighth grade student who had a "high score" and three eighth grade students who scored "well above average." 27% of students scored average. 35% of students scored low average. 10% of students scored well below average. Fifth and sixth graders' scores were the lowest, with all of the students falling into the average, low average, and well below average categories. Seventh and eighth grade students' scores were among the highest. Third and fourth grade students spread fairly evenly throughout each of the categories.

Tracey Landry expressed disbelief at the report of poor test results received by students who were independently tested, stating that some of those students received a variety of results when tested at more than one facility. Mike Landry commented that some students performing at the lowest levels were performing at that level when they joined the school and have not been at T.M. Landry for a substantial amount of time. Additional information would be needed to evaluate this area.

- **Allegations of T.M. Landry Falsifying Information or Encouraging Students to Do So**

The Graduating Students and Mr. and Ms. Landry denied that T.M. Landry falsified statements, essays, or test scores on college applications. Although Couhig Partners observed mistakes and inaccuracies on submissions to college admission programs by T.M. Landry, such mistakes did not appear to be material or rise to the level of systematic fraud, but some raised concerns.

As with the majority of high schools, T.M. Landry and its students apply to colleges through the Common App program. After receiving signed consent forms, Couhig Partners was granted access to certain applications on the program by T.M. Landry. The Graduating Students interviewed also provided printouts of their submissions. In brief, the major components of T.M.

Landry's submission to colleges are (1) a school report of the student's grade and rank; and (2) a letter of recommendation from the school's counselor, Ms. Landry. The students were responsible for submitting applications to each college. Each application contained personal information, a transcript of courses taken, a list of extra-curricular activities, achievements and awards, grades, ACT scores, and a personal essay.

T.M. Landry's ranking of the students was perhaps the most difficult submission to reconcile. Of the school records submitted for the Common Application for the 8 students who consented to records review, 7 were ranked in the top 10% of their class (in a class of 16 students). Specifically, T.M. Landry listed the students' ranks and GPAs as ranging from 3.79 to 4.0, with 7 of those students ranking in the top 10% of the class, and 1 student ranked in the top 20% of the class but that student had the same GPA as a student ranking in the top 10%.

When asked about this, Ms. Landry could not explain the reasoning behind the ranking in this manner and indicated that it may have been a mistake. However, Mr. Landry defended the rankings, explaining that he was instructed by college admissions counselors and educators at conferences of recommendations on how to rank students at such a small school. Mr. Landry was told by some educators to not rank the students at all and by others to rank students who were "performing well" in the top 10% of their class. Mr. Landry was unable to provide the names of individuals who encouraged him to rank an outsized number of students in the top 10% of the class in this manner.

Mr. Landry reasoned that ranking the students otherwise would be unfair to T.M. Landry students, because their class size is so small in comparison to other high school graduating classes that very high-performing students would have a comparatively low rank in the class. He stated that he felt that it was necessary to provide a class rank, because T.M. Landry didn't have "street cred" in past years. However, Mr. Landry stated that because the school had a more established reputation recently, the school had planned to discontinue this ranking practice even before the Articles were published. Mr. Landry stated that T.M. Landry will not list class rank on Common App student reports going forward.

Similarly, for the student-supplied information on the Common App, when responding to the question regarding the number of ACT tests "taken" the students seem to be responding about the number of ACT exam sessions that they are taking scores from, as opposed to reporting the full total of ACT exams that student has literally ever "taken." When asked about this, Mr. Landry explained that this was also a practice that he and few other high school counselors were told to employ by a college admissions officer, adding that it was because it does not matter in the decision process.

Upon review of the counselor recommendation letters provided by Tracey Landry for the Graduating Students, it was clear that, of the nine letters reviewed, seven letters contained large or small portions of nearly identical representations (in one case, only the student's name appeared to have been changed). Mr. Landry and Ms. Landry provided contradictory responses regarding those recommendation letters. Ms. Landry explained that the students would have

reviewed those letters and confirmed the accuracy of the information and that if similar information applied to multiple students and the students approved the letters, she saw no issue with using the substantially similar recommendation letters. Mr. Landry, on the other hand, stated that recommendation letters were not shown to students or parents this year, that the similarities could have been an indication of a mistake, and if mistakes were made, they would be corrected and the appropriate colleges would be notified (see additional discussion below).

Couhig Partners asked each of the Graduating Students interviewed about their extra-curricular activities listed in their college applications. Although the clubs were not as formal as clubs at larger, more traditional schools, each student was able to identify and discuss the purpose of each club, when the club met, and how many members were in the club.

Couhig Partners asked each individual interviewed about ACT testing. Each individual confirmed that the tests were taken at authorized ACT testing sites. None of the tests were administered at T.M. Landry. None of the tests were proctored by T.M. Landry teachers, administrators, or employees.

When asked about their personal essays, Graduating Students denied that anyone at T.M. Landry encouraged them to lie about their backgrounds. One student stated that Mr. Landry told them repeatedly that “you are enough” (indicating that no fabrication should be necessary because each student’s story was worthy of the colleges). Mr. Landry and Ms. Landry also denied that they had encouraged students to stretch the truth in their essays. Ms. Landry and some of the Graduating Students interviewed noted that she assisted each student by reviewing the essays for typographical or grammatical errors. She also encouraged the students to “speak to who they really are,” and “make sure that what they’ve been through shows.”

Couhig Partners requested that Mr. Landry ask the students to sign a copy of their T.M. Landry transcript and state on it, “I confirm that I have completed the courses shown on this transcript and am in the process of completing the 2018-19 courses shown on this transcript.” Ms. Landry provided transcripts apparently signed by each student, with the requested statement written out on the transcripts by each student.

In two cases, Couhig Partners observed that comparing the list of classes on a student’s transcript with the classes listed by the student on his or her Common App, a current course the student is apparently taking did not match up between the documents. In one case, when asked about the discrepancy, Mr. Landry reached out to the student, and the student stated that the independent study course on the transcript was inadvertently left off the Common App list of courses. In the other case, Mr. Landry contacted the student who explained that the student originally planned to take the class listed on the Common App, but after attending a college over the summer decided to take the course reflected on the transcript but forgot to make a change to the information reflected on the Common App.

Finally, in one case, Couhig Partners observed that two of the grades for a student (one in a course from 2016-17 and one from the Summer of 2018) changed from “B”s to “A”s from the

transcript contained in the school's records to the transcript provided with the Common App. Mr. Landry's explanation was that he entered grades for students on their transcript, and that, although he didn't want to admit it, he needed glasses but refused to see the doctor. Therefore, he said, he will accept responsibility for any discrepancies.

Again, while Couhig Partners did not uncover evidence of systemic fraud, some errors and inaccuracies were apparent in records, as were apparent efforts to show the students in the best light possible. All of the errors or potentially questionable information found by the investigators on applications were pointed out to Mr. Landry, who represented that he notified all of the colleges who received the applications of the issues. In addition, Paul Pastorek provided correspondence to many of the schools directly notifying them of the errors or potentially questionable information.

Additional Details about Couhig Partners's Investigation

On January 15, 2019, Couhig Partners had the opportunity to interview five T.M. Landry students who are currently eligible for graduation. Interviews took place at the office of Barry Sallinger beginning at approximately 10 a.m. Two Couhig Partners attorneys participated in the interviews with the five students. Two students were interviewed with a parent present. Three students elected to be interviewed without a parent or guardian. The interviews were not recorded.

According to information received from the school, 16 students attending T.M. Landry were Graduating Students prior to the publishing of the Articles. Thereafter, many students left the school, because of controversy surrounding the Articles, we were told, and nine Graduating Students remained at the school as of late December 2018. On January 25, 2019, Couhig Partners was informed that two additional Graduating Students had left the school. According to the last information received, four Graduating Students remain at the school. The school has apparently lost more than 100 students since the Articles were published.

We were informed by the school's records administrator that the college applications of the Graduating Students had, in effect, been put on hold due to the timing of and allegations in the Articles. Consent forms were obtained from nine of the ten Graduating Students to allow Couhig Partners to interview those students and to review their T.M. Landry school records, including full Common Application information and correspondence with the Landrys.

Documents were requested and received from the administrator prior to the interviews, including the school's records for the Graduating Students and Common Application records supplied by the school² for the Graduating Students as well as certain correspondence between Tracey Landry and Mike Landry and those Graduating Students.

² The Common Application process requires records to be submitted by applying students as well as by the school of the applying student. Therefore, the school has access to the records supplied to the Common Application by the school and the student has access to the records supplied to the Common Application by the student.

Thereafter, on January 8, 2019, the administrator provided Couhig Partners with the Common Application records supplied by six of the Graduating Students. She also informed Couhig Partners that three students had elected not to provide their student-supplied Common Application Records for the Investigation. On the same day, Greg Davis informed Couhig Partners that those same three students had elected not to participate in interviews. Mr. Davis explained that the Graduating Students are exhausted by the controversy created by the Articles and are emotionally drained from the months-long process of constantly defending themselves and the school.

The administrator and Mr. Davis assisted with scheduling the interviews, and on January 13, Couhig Partners was informed that one of the six students had “withdrawn from the investigation process.”

A follow up was made to the administrator prior to the interviews for records not received or requiring different formatting, but those additional records were not provided prior to the interviews. On January 25, she stated that technological limitations prevented the school from providing those documents.

Tracey Landry was interviewed on January 25, and Mike Landry was interviewed on January 28, 2019. On January 29, 2019, Couhig Partners requested corroborating documents from the Landrys, including the following: (1) non-confidential records related to TerraNova test results in the past 5 years (some documents were provided); (2) recordings in T.M. Landry’s possession of interviews with the New York Times (a video recording was provided), (3) non-confidential transcript records to show T.M. Landry’s practice of maintaining transcripts (limited records provided); (4) information related to practices T.M. Landry intends to implement for maintenance of transcripts (information provided); (5) contact information for parents or students who can confirm that they are disappointed that the school has curtailed its practice of yelling and/or kneeling (partial information was provided to date, in the form of a list of names of students for whom the practices of kneeling and/or yelling had been authorized); (6) redacted information to confirm the progress of T.M. Landry alumni (documents provided); (7) certain correspondence related to recommendation letters (documents were not provided); (8) non-confidential correspondence between teachers and administrators discussing student progress/development (limited documents were provided); (9) non-confidential examples of completed tests used to establish students’ “mastery” (documents provided); (10) non-confidential results of online tests taken by students (documents provided); (11) documentation related to school donations (documents provided); (12) a list of conferences attended by Mike Landry related to education training (information provided); and (13) photographs related to the 3D-printer Build-a-Thon (Ms. Landry responded that photographs could not be provided).

On February 8, 2019, Couhig Partners reached out to ten T.M. Landry Alumni who are currently attending four-year colleges and asked them to participate in short interviews about their experience with the school as well as the Articles. Several responded that they would have to discuss it further with a parent; some did not respond; and ultimately two participated in short interviews.

In early February, Couhig Partners began corresponding with Ashlee McFarlane, an attorney who apparently represents several former students, their parents, and former teachers of T.M. Landry. Although Ms. McFarlane initially indicated that she would provide documents to Couhig Partners that supported her clients' allegations against the school, she ultimately declined to provide any documents.

Couhig Partners also provided her with a list of eight students (who provided information for the Articles) and requested that the students be made available for interviews by Couhig Partners. Ultimately, Ms. McFarlane declined to identify the former or current students, parents, and/or teachers whom she represents; declined to allow Couhig Partners to interview any of her clients; and declined to provide a written statement of facts from her clients.

The information provided by Ms. McFarlane was limited to what she called an "abbreviated attorney proffer" comprised of anecdotal references made verbally on a phone call, in which she stated that she has clients who have alleged that they were aware of false and/or inaccurate information on college applications; false and/or inaccurate information on T.M. Landry transcripts; false and/or inaccurate information on college recommendation letters; at least one instance of a student withdrawing his or her college application because of false and/or inaccurate information; and of alleged student meetings held by Mike Landry in which he assigned false information for students to put on their college applications. But, again, she declined to provide detailed and specific information. Moreover, she declined to provide any documents or to make any individuals available to corroborate these claims. With regard to the allegation that student meetings were held by Mike Landry so he could provide false information to supply for college applications, Mr. Landry denied that there was any truth to the allegation.

Finally, Couhig Partners requested and received additional information and documents from Mr. and Ms. Landry on or around March 8, 2019 related to Graduating Students' college applications, Dual Enrollment records, and transcripts. And on March 19 and 20, Couhig Partners and Paul Pastorek interviewed T.M. Landry's administrator and five teachers.

Respectfully Submitted,

COUHIG PARTNERS, LLC

Robert E. Couhig, Jr.

Claire E. Pontier

Jeff Pastorek