KEY FACTUAL FINDINGS

PRESENTED BY THE CATLIN GABEL BOARD OF TRUSTEES

December 11, 2019

THE CONTENT OF THIS COMMUNICATION IS SENSITIVE AND GRAPHIC AND NOT INTENDED FOR CHILDREN. READER DISCRETION IS ADVISED.

INVESTIGATOR'S FINDINGS: BACKGROUND

In the fall of 2018, in response to public Facebook posts regarding past teacher sexual misconduct at Catlin Gabel, the Board retained attorney Lori Watson of Watson Law Workplace Investigations, LLC to conduct an independent investigation. We asked Ms. Watson to investigate reports of sexual misconduct by any employee at any time at Catlin Gabel. We shared Ms. Watson's contact information by email and in a mailed letter to the Catlin Gabel community, with an invitation for anyone with information they wanted to share to contact her. We also provided an anonymous voicemail for anyone who wanted to share information without disclosing their identity.

For the next twelve months, Ms. Watson received information and interviewed witnesses, including alumni, as well as current and former Catlin Gabel faculty and staff. The investigator did not engage in any proactive outreach to those identified, or those believed by others to be victims/survivors of inappropriate behavior by Catlin Gabel employees. Ms. Watson only interviewed self-identified victims/survivors who came forward to either the school or her directly out of concern that contacting those identified by others as victims/survivors creates a high risk of re-traumatizing those individuals. Ms. Watson sought to contact current and former Catlin employees who may have had knowledge of misconduct, or due to their position, could or should have had a role in responding to the misconduct. Finally, Ms. Watson also sought to contact any living former faculty or staff member who was the subject of a credible report made to her during the investigation. The school provided Ms. Watson with all the school records she requested.

The Board of Trustees set the criteria used to decide whether to disclose the names of the past faculty and staff who had engaged in sexual misconduct. We asked Ms. Watson to evaluate a number of factors when determining whether to include a finding of misconduct in her report. Before disclosing the identity of any former employee, she began with this question: "*After a careful review of the available evidence, do I have a good faith belief that an allegation of sexual misconduct against a former employee is well-founded (i.e., is it more likely than not that the misconduct occurred)?*" If the answer was "yes," Ms. Watson considered additional questions:

- Were there multiple credible first-hand accounts of misconduct by this one employee?
- Was there an admission of culpability by the former employee?
- Was the evidence independently corroborated in some other way (for example, documentary evidence or judicial findings)?[1]

In an effort to balance the board's request for transparency and holding wrongdoers publicly accountable with an equally important need to take all reasonable steps to avoid the possibility of making unfair public accusations against former employees, Ms. Watson disclosed the identity of a former employee only if she could comfortably answer "yes" to at least one of the additional questions above.

[1] An important aspect of this investigation was to allow victims/survivors who came forward to keep their identities confidential if they wished to remain anonymous to everyone, including the investigator. Anonymous reporting made the evidence more difficult for the investigator to corroborate, but we did not want to deter anyone from coming forward because they did not want to be identified.

In addition, we asked the investigator to consider the nature and extent of the allegations. We deemed it appropriate to publicly name a former employee only when the criteria above were met and the severity of the conduct rose to a level that would have warranted a report to DHS or law enforcement.

Finally, many of the alumni and witnesses who spoke with Ms. Watson indicated that they did not wish their identities to be revealed. The privacy of the victims/survivors is a high priority; we did not want to risk compromising the privacy of anyone who participated in the investigation. Therefore, if disclosing the identity of a former employee would by association or calculated speculation reveal clues as to the identity of the victim/survivor, we directed Ms. Watson not to disclose the identity of the former employee in her report.

We asked Ms. Watson to divide her report into three categories:
(1) former employees believed to have engaged in sexual misconduct, identified by name;
(2) former employees believed to have engaged in sexual misconduct, not identified by name; and
(3) other credible reports of grooming behavior or other inappropriate sexual behavior, not necessarily identified with any particular faculty or staff member.

Named or unnamed, the employees who engaged in sexual misconduct violated the trust placed in them by the community, and students were harmed as a result. By separating the employees into three categories of disclosure, we do not mean to suggest otherwise. What follows are the key factual findings of the investigation.

A total of 21 former Catlin Gabel faculty and staff members were reported by witnesses to have engaged in sexual misconduct ranging from boundary-crossing behavior to criminal sexual abuse. Those who reported sexual misconduct described a wide variety of inappropriate acts, including grooming behaviors, inappropriate touching and kissing, groping and sexual intercourse occurring both on and off campus. These instances of misconduct occurred as long ago as the mid-1960s and as recently as 2016. None of the reports investigated involved incidents of sexual misconduct by any current Catlin Gabel employees. All of the students who reported sexual misconduct attended Catlin Gabel at the time of the misconduct, although some students reported additional concerns of misconduct that took place after they had graduated. In addition, one of the identified faculty members allegedly subjected a student who did not attend Catlin Gabel to sexual misconduct in his office on Catlin's campus.

Some of the reports made to our investigator were the first the school learned of the misconduct; either they had not been reported previously or the school had no record of such a report and could not find a witness who was aware of any report being made at the time. Other reports were made to the school at the time or some time after the misconduct took place. Some of the reports to the investigator were anonymous and/or did not include sufficient detail necessary for further investigation. Other information provided was secondhand or unconfirmed rumor for which the investigation did not find corroboration. Ultimately, findings were made regarding the abusive conduct of nine former employees of the Catlin Gabel School.

Catlin Gabel values transparency regarding the events of the past. It also recognizes the importance of protecting the integrity of the investigative process. In sharing a summary of the key findings of our

investigation, the board has tried to respect the confidentiality and privacy of the individuals who came forward to share their stories, be they survivors or witnesses. To this end, these findings do not include details that could lead the Catlin community to discern the identity of the survivors or other witnesses.

We caution all readers that the following findings include details that are not intended for children and that may be upsetting for anyone to read.

SECTION 1: EMPLOYEES BELIEVED TO HAVE ENGAGED IN SEXUAL MISCONDUCT (IDENTIFIED BY NAME)

1: RICHARDSON SHOEMAKER

Richardson Shoemaker, more commonly known as "Shoe" or "Dick," was employed as a faculty member at Catlin Gabel from September 1964 through June 2001. His primary role was teaching 6th grade. However, at various times he also taught other subjects such as P.E., was involved in working with students to build go-carts, arranged and led school trips to the Oregon coast, coached girls' soccer, drove a Catlin school bus route and helped organize the annual rummage sale fundraiser. He died in 2018.

A. The reports of misconduct shared with our investigator:

1. **Sexual misconduct in his home in the 1970s**

In the 1970's, Shoemaker reportedly molested an Upper School student at his home; he touched her genitalia and made her touch his. The student was at the Shoemaker residence for a sleepover with one of the Shoemaker children (a Catlin classmate). This sexual misconduct was not reported to Catlin Gabel at the time it occurred. The student told a classmate what happened to her at or near the time of the incident, and two students corroborated the account as part of the investigation.

2. **Sexual misconduct in class in the 1980s, 90s, and 2000-01.**

Students reported to the investigator that during his tenure as a 6th grade teacher during the 1980s, 1990s and his last year of employment (school year 2000-01), Shoemaker engaged in sexual misconduct in public with female Middle School students by touching them inappropriately, including putting his hands inside their clothing; groping, rubbing, fondling or patting female students' breasts and bottoms; and having students sit on his lap on a regular basis in class when he helped them with math.

Twenty-three students reported to the investigator that they had endured this misconduct, as had many of their female classmates. Additional students reported to the investigator that although they did not endure the misconduct, they had witnessed it. One student also reported to the investigator that on at least one occasion, Shoemaker looked down her shirt in PE class. Another student reported that as a 7th grade student, when she was alone in a classroom Shoemaker backed her into a table, pinched her chin, and kissed her on her mouth.

Shoemaker's physical contact with the female students was typically not secretive; he engaged in inappropriate touching in public and in full view of the class. Students reported to our investigator that Shoemaker would put his arm between the student's arm and breast "as if it was okay, in class," wrapping his arm around the student's back and letting his hand touch the student's breast. Some students tried to avoid standing near Shoemaker so he could not touch them

inappropriately. When he was coaching, he would hug a female player and place his arm over her shoulder with his hand hanging at or on her breast. The conduct was described as "not an isolated thing." One student recalled that after she left Middle School and came back to visit 6th grade, Shoemaker gave her a side hug and aggressively pat and grabbed her left breast, which took her by surprise. She did not know at the time whether it was intentional, but she chose not to return to visit Shoemaker again.

Students also reported in this investigation that Shoemaker insisted that female students sit on his lap when they needed help on math, which made them uncomfortable. One student reported she was made to sit on his lap and when she did so, he put his hand up her shirt. She got off his lap and did not ask again for math help because she did not want to be touched by him. One student from the 1990s recalled that Shoemaker did not allow students in his class to get math help from classmates, but instead required that they get help from him at his desk where he forced the girls to sit on his lap. A student recalled that Shoemaker had a very friendly way of saying, "Pop on up and sit on my lap." Then, while sitting on his lap, he would feel up or down the front and back of girls' shirts or dresses. Another student reported that this happened to her repeatedly "out in the open," and that she saw it happen to other girls in the classroom. Another student reported that at least once, Shoemaker put his hand inside her underwear (not in the crotch area). She said that after this, she began regularly wearing pants to school instead of a dress to prevent additional touching of this type. Another student described herself as "young, embarrassed and confused" by Shoemaker's behavior.

In the words of four alumnae:

Within the first few months of school, I noticed strange behaviors that I hadn't encountered with teachers before. Often, after class, as the students shuffled out the door, Shoe would pat one or two of us on the butt. It was casual and usually came along with a, 'See you tomorrow!' It was strange, and it became a kind of subject of 11-year-old's gossip. In addition to his habit of touching student's butts, I remember a few times that Shoe would ask a student to sit on his lap. As we were working on math problems he would walk around the room and offer help. A couple of times I asked for help, and he would kind of lean over, acting like it was a struggle to bend over to see the paper. Then he would say something like, 'Here, why don't you just move over and then sit here on my lap so it's easier for me to see.'

When I was in 6th grade we had a math, teacher named Shoe who repeatedly touched me and many other female students in my class very inappropriately. At times when helping us with our work he would put his hands on our shoulders and often graze our breasts, and sometimes our bottoms as well. Strangely it was not done in private or even discretely, rather in the open and many people saw. We often talked about it after class and other students would speak of what they had seen. I also remember talking about it with the 7th and 8th graders and they shared similar sentiments.

Shoe was a legacy teacher and he was close friends with a lot of other teachers whose kids were my friends . . . so I trusted that he was considered a good guy and that this was how it was done at Catlin where teachers went by their first names. But I did think it was weird and that feeling started to mount. In addition to those behaviors I also remember that he would occasionally put an arm around me and graze my breast, which was non-existent at age 11. I

didn't really see this as sexual abuse because I wasn't there yet, physically or mentally. I would have just characterized it as "weird" rather than "creepy" at the time. Once he made a strange comment about another female classmate's body . . . something along the lines of, 'it looks like you have sweat coming out of your bra.' Everyone laughed. He then corrected to "brow." That could have been an honest mistake but taken with everything else it just added to the feeling that he was really focused on our bodies.

In sixth grade with Shoe, he had an affectionate way of grabbing kids for hugs, pulling them in and holding onto them by wrapping his hands around our chests. As a girl who developed early, this was incredibly uncomfortable. I had to physically opt out of the hugging/grabbing game, which was noticed and ended up creating discord between myself and Shoe. It was incredibly isolating. I wanted to be included so badly and to be cared about in the same way everyone else was but didn't want to be touched in that way. I have always given him the benefit of the doubt, that he had no intention of misconduct, only general affection for all the kids. And probably had no idea how the hugging game made me feel.

B. Notice to the school and the school's response

Much of the misconduct noted above went unreported at the time it took place. Some of the students gave Shoemaker the benefit of the doubt that he did not intend to grope them and had inadvertently grazed their breasts. Others did not feel comfortable speaking up. One student shared with the investigator that she believed that if she spoke out about the inappropriate touching she would be ostracized from her class and the school. Another student reported that when some classmates did speak out, other students called them liars and the girls were alienated from their classmates.

Multiple students reported to the investigator that Shoemaker's inappropriate conduct was not a secret among Middle School students, some of whom referred to him as "touchy-feely Shoe" and spoke of him being "handsy." It was commonly acknowledged among many 6th grade girls in the 1990's that Shoemaker touched some female students in a manner that made them uncomfortable.

1. Report by students to a Middle School faculty member in the 1990s

In the 1990's, five or six female classmates together discussed their concerns about Shoemaker's conduct and shared their uncomfortable moments with each other. For some, it was the inappropriate hugging. For another, it was a compliment about her physical appearance. For one female student, it was being kissed by him when they were alone in a classroom. Together, the girls decided to report the conduct to the school. They went to a faculty member of the Middle School (Robin Schauffler) and told her that Shoemaker had kissed one of the girls and had touched her and other students inappropriately.

Robin Schauffler was interviewed twice in the past year – first by the current head of school and later by the investigator – about her response to the students' report. She recalled that the girls reported to her that Shoemaker had kissed one of the students and touched her and the other girls. She took the complaint seriously and there was follow-up to address the concerns. She does not now have a clear recollection of what steps she took to respond to the reports from the students but believes she told either the head of school or the head of the Middle School about the allegations. Either she or that administrator addressed the issue with Shoemaker. [2] The school

[2] When interviewed, Robin Schauffler told the current head of school that she believed she told either the Middle School head or the head of school about the allegations. At the time, the head of school was Jim Scott, the

has no records documenting a conversation.
The student who had been kissed reported that someone followed back up with her to tell her that Shoemaker had been confronted and that his response was that he "did not think they minded."[3] Schauffler did not recall this but believed the phrase sounded like one Shoemaker could have said. Schauffler also noted that in that time period, students and adults were closer in their physical interactions than what the standards are today, and it was not unheard of for a student to sit on a teacher's lap. She knew Shoemaker was physical and hugged students but had never seen him do anything inappropriate.

The same student also recalled to the investigator that she was told that she could decide whether Shoemaker keeps his job. (Schauffler did not recall saying this.) It did not feel fair to this Middle School student to be put in the position of making such a decision. The student also reported that some of her classmates, especially males, were upset that the girls had reported Shoemaker's conduct. They made comments such as, "How dare you accuse him?!" Because Shoemaker was "on a pedestal" at Catlin, and a beloved favorite teacher of so many other students, the student and the other girls decided not to press the issue.

Schauffler felt she had been supportive of the students at the time of the report and afterwards. The student who had been kissed by Shoemaker wrote a message in Schauffler's yearbook a few years later, thanking her for her support during Middle School. She specifically noted how Schauffler was there for her when she experienced harassment and called her a "true and treasured friend."

2. Attempts by two Middle School faculty to address Shoemaker's habit of having students sit on his lap

After Catlin faculty attended a sensitivity training in 1995 or 1996 that included a discussion of appropriate physical contact between teachers and students, two Catlin faculty who co-taught 6th grade with Shoemaker spoke to him about no longer having students sit on his lap. The teachers, Brenda Duyan and Hannah Whitehead, knew Shoemaker had a habit of having students sit on his lap. While they did not believe he was engaging in inappropriate behavior, they still thought it was important for the practice to stop given how it could be perceived. The faculty members told Shoemaker they felt he should stop having students sit on his lap to prevent any risk of a claim of inappropriate conduct. Shoemaker reacted by becoming upset and walking out of the meeting.

3. Report by students to another Middle School faculty member in the 1990s

Years later, another group of female students again reported Shoemaker's inappropriate behavior:[4]

I do not remember how the decision to come forward took shape. But over the course of a few weeks, myself and three other female students decided we wanted to bring this to another adult's attention.

---

associate head of school was Andrew Beyer, and the head of the Middle School was either Roy Parker or Donna Rowland. These individuals either had no recollection of any specific complaints of misconduct being brought to their attention or did not respond to the investigator. Schauffler also believes she would have spoken to a colleague about the report at the time.

[3] The other students who accompanied this student to report the misconduct do not recall anyone at Catlin following up with them.
[4] Another student corroborated this account.

The teacher we went to was our humanities teacher, Brenda Duyan. She was our health teacher as well that year (a position that rotated between teachers) and we were closer with her than some other faculty. Brenda listened to our complaints and told us that since this made us so uncomfortable the best thing to do was talk to Shoe about it directly. Again, I thought this was strange, but wrote it off as another feature of the community vibe at Catlin....

So the four of us waited until after gym class one day, when Shoe was supervising the class. When all the other students had left the gym, we approached him and asked to speak with him. One of the other three girls did most of the talking. I just remember saying essentially, 'Hey Shoe, sometimes you touch our butts and bodies in a way that makes us feel uncomfortable.' I don't remember the full conversation, but I do remember that he got very emotional and started to tear up. He told us that he thinks of us as his own kids or grandkids and would never want to make us uncomfortable and he was sorry. It was very awkward and the four of us really wanted to get out of the situation. Again, we were alone with him, no other adult was supervising this discussion.

I don't remember anything ever happening after that. I never brought it up to my parents. I didn't bring it up to a teacher again… I was 11. I wanted to move on and do 6th grade things and not focus on my creepy math teacher. So, I haven't really talked about it since.

Brenda Duyan told the investigator that she did not have a memory of a group of female students coming to her to report feeling uncomfortable about Shoemaker's behaviors; she believes she would have recalled such a conversation, especially after her own experience of speaking to Shoemaker about not having students sit on his lap. Duyan also does not recall telling a group of students to speak with Shoemaker on their own and does not believe she would have told a group of girls reporting this type of concern to handle it on their own. Duyan stated that she was not saying that the girls who told the investigator that they made a report to her were being untruthful.

4. Independent investigation by law enforcement

In 2000, the head of school (Lark Palma) was contacted by the Washington County Sheriff's Department, which was investigating a report of historic sexual abuse by Shoemaker that did not involve any current or recent students and did not take place on campus. The school was not involved further in this investigation other than the head of school (Lark Palma) answering a few questions.[5]

In light of the investigation by law enforcement, as well as a recent report Palma had received from a 1970s alumna alleging past misconduct by Shoemaker, the head of school believed she had enough information to compel Shoemaker to leave Catlin. He resigned at the end of the 2000-01 school year.

5. Reports after Shoemaker's retirement from Catlin

After Shoemaker left Catlin, there were additional misconduct reports from Middle School students. One female student stated in a class attended by the Middle School counselor that

[5] This investigation was apparently closed because the allegations were beyond the statute of limitations. There is very little documentation of the investigation presumably due to document retention policies.

Shoemaker had made her feel uncomfortable. Another female student in the class said she had felt the same way. The counselor followed up after class and learned that when they were in 6th grade, they had been made to sit on Shoemaker's lap and he had rubbed their bottoms. The counselor conferred with the head of school, who had only two weeks earlier received a report from a former student that Shoemaker had fondled her breast when she was a Middle School student.

The counselor promptly reported the sexual misconduct involving the three students to DHS and to Washington County law enforcement. The counselor was interviewed by the Washington County Police, and the school provided requested information.

The head of school had Shoemaker's portrait on a Catlin school bus painted over and told Shoemaker he was not permitted on campus or at school events, and he should stay away from the students.

Later that same school year, the head of school received notice of two additional reports of sexual misconduct (inappropriate touching) by Shoemaker during the previous year. The head of school did not feel the additional information needed to be reported because Shoemaker was no longer in contact with students and a similar report to DHS had already been made by the school a few months earlier.

Law enforcement eventually determined it had insufficient evidence to prosecute and classified the case as inactive.[6]

In 2017, an alumna posted on social media that she had been groped and kissed by her 6th grade teacher. The head of school (Tim Bazemore) followed up with the alumna to hear her story and investigate her allegations. He consulted with the board chair, HR director and school attorney, and conducted numerous interviews including past school heads, co-teachers, and alumnae. He then communicated his findings as well as current school policies to the alumna. During the investigation, he learned that Catlin had made a report to DHS shortly after Shoemaker's retirement and that Shoemaker was barred from campus. He then attempted to contact Shoemaker intending to tell him that as the current head of school he was aware of past allegations of misconduct and to re-iterate that Shoemaker was not allowed on campus. He learned Shoemaker was terminally ill with cancer.

Shoemaker died in August 2018. Shortly thereafter, alumnae began to speak out on social media in late 2018 about Shoemaker's sexual misconduct. The school then initiated this investigation.

2: ROBERT ASHE

Robert "Bob" Ashe, now deceased, was employed by Catlin Gabel from 1967 to 1995 as an Upper School English teacher. He also coached soccer. Students reported to the investigator that Ashe engaged in sexual misconduct during the 1970s, 1980s and 1990s, as follows:

1. Engaged in sexism towards female students.
2. Showed an untoward interest in female students by flirting and showing favoritism.
3. Made repeated inappropriate comments about a female student's "nice legs" and egging on a male student to tell the same female student that she had nice legs.
4. Made a point of calling students' attention to the most sexually charged portions of the plays they studied; had students act out the bawdiest scenes from plays; and made a male student kiss a particular female student whom Ashe targeted.

[6] Any underlying documentation by law enforcement of its investigation was unavailable to the investigator.

5. During one such kissing scene in a play being acted out in class, encouraged a male student who had engaged in crotch-thrusting at a female student.
6. Ogled a female student's breasts, making her uncomfortable.In the 1980s, targeted one particular female student by singling her out for her appearance, discussing her boyfriend, commenting suggestively when he noticed her legs were crossed or she moved her hair away from her face, insisting they meet for student-teacher conferences in his office with the door shut even when she asked for it to be open, hugging her tightly, making another student give him his theater seat so he could sit next to her to watch a play and then walking his fingers up and down her arm during the performance, and accusing her of intentionally trying to seduce male students bystretching in front of them before sports practice.
7. In the 1970s, took a female student to an all-male drinking event, became inebriated, and tried to kiss the student on the way home in the back seat of a car.
8. In the 1970s, attempted to have sexual intercourse with a student on a trip abroad.

Almost all of the above alleged misconduct was not reported to Catlin Gabel at the time it occurred. However, some of Ashe's behavior was apparently known among students. One student from the 1980's commented, "During the years I was in the Upper School, it was considered common knowledge among the student body that [Ashe] showed an untoward interest in female students. There were rumors … If the rumors were true it was absolutely not right, of course, although we all weirdly accepted it as the way the universe worked and what adults were entitled to get away with. Somehow no one of us was the least bit surprised."

One anonymous student reported to the investigator that she sent Catlin Gabel a letter and metwith the head of school regarding Ashe's misconduct. It is not clear when this report was made; Catlin Gabel has no record of this report or the actions taken, if any, in response to it.

In the late 1980s, the Catlin newspaper included a fake personals classified ad that read, "Older male teacher looking for high school girl to hook up with," or words to that effect. This joke was intended to make fun of Ashe and was widely understood as such.

Also, in the late 1980s, two students went to the college counselor to report that Ashe looked at one student's breasts in a way that made the student uncomfortable. The college counselor appeared to doubt the report. The students do not know what actions, if any, the school took in response to the concern.

In December 1995, Ashe was sued in state court for allegedly sexually abusing a high school student from another Portland area school in the 1970's for a two-year time that began when she was 16 years of age. The complaint alleges that he kissed her, touched her breasts and vagina, and made her touch his penis.[7] The plaintiff had attended Ashe's soccer camp (which was held on Catlin Gabel's campus in 1979) and alleged that some of the sexual abuse took place on the Catlin Gabel campus in Ashe's office. In June 1995, prior to filing the lawsuit, the plaintiff's attorney sent Catlin Gabel a letter outlining the allegations in the complaint. The school investigated the allegations and negotiated Ashe's resignation effective August 31 (the end of his teaching contract).[8] He and his wife then moved to Ireland, his country of origin. He died in 2000.

---

[7] This lawsuit was later dismissed (presumably due to a private settlement).

[8] Andrew Beyer was the Interim Head of School for the school year 1994-95 and ended his tenure at the end of June 1995. Lark Palma joined Catlin Gabel as the Head of School in July 1995. The investigation took place over the summer, during this transition.

3: MARK PETERSEN

Mark Petersen was employed by Catlin Gabel from 1975 to 1997 as a 5th grade teacher. In the 1970's, Petersen engaged in sexual misconduct with a female student during her 12th grade year. Her parents invited Petersen to their home, where he went on a walk with the student and hugged and kissed her. After that, Petersen and the student would meet up to play sports. He invited her to his apartment when his wife was not home. While there, he asked her questions of a sexual nature. He had her touch his penis. He wanted to have sex but she did not, so they refrained. Petersen later returned to her family home a second time and kissed her when they were out of view of her parents.

The conduct was not reported to Catlin Gabel at the time.

When contacted by Ms. Watson, Petersen confirmed that he had engaged in the reported conduct. He stated that the conduct happened when he was "young and stupid," and he regretted his actions.

4: STEPHEN RICHMOND

Stephen Richmond was employed by Catlin Gabel from 1973 to 1982, where he taught theater, theater tech and shop. Richmond allegedly engaged in sexual misconduct with multiple male students and engaged in other inappropriate behaviors with students.

Richmond allegedly groomed a Middle School student who was struggling socially. Richmond was friendly to him, took pictures of him, and told him he was good looking. He kissed the student and then invited him to his home near campus, where they became nude and had full body contact. The student felt uncomfortable and left Richmond's home; he avoided him after that incident.

Richmond allegedly kissed another student and fondled his genitalia through his clothing on multiple occasions when the student was in 7th – 9th grade. The student told the investigator that he believed Richmond saw him as vulnerable and therefore initiated physical contact with him when they were in the theater together. The student also told the investigator that "there was a lot of sexual misconduct that was going on" at Catlin in the 1970s.

Another student reported to the investigator that Richmond engaged in other inappropriate behavior with multiple students, including physically pulling a student towards him between his legs when he was seated, having a Lower School student sit on his lap, and positioning himself to look up a female student's nightgown when she climbed down a ladder from a loft on an overnight trip. He gave one female student special attention and engaged in unwanted physical contact with her. When she told him she did not want to be touched that way, he then ignored her and went on to pay special attention to another student, which caused the first student to feel devastated.

None of the misconduct was reported to Catlin Gabel at the time. A student who reported concerns to the investigator noted that when she attended Catlin, she felt the counselor was not someone students could talk to about concerns like these.

When contacted by Ms. Wilson, Richmond denied all sexual misconduct and noted that part of his job was to photograph the students.

5: SAMUEL CRAWLEY

Samuel Crawley was employed by Catlin Gabel from 1973 to 1984, where his primary role was as a teacher of Upper School English. Crawley allegedly touched, fondled and had sexual intercourse with a 12th grade student, and engaged in inappropriate sexual relationships with multiple other students.

On an overnight class trip, Crawley allegedly fondled a student at night as they were going to sleep and told her, "I'm so attracted to you, but we can't have sex until you are 18." The student turned 18 while still attending Catlin Gabel, and they began a sexual relationship the weekend of her birthday. She noted to the investigator, "Everybody at Catlin knew this stuff between students and teachers was going on." After she graduated, she moved away but was within driving distance. Crawley allegedly began visiting her and started buying her alcohol.

The conduct was not reported to the school by the student, though it was apparently known to the student's friends and her sibling. The head of school (Manvel Schauffler) was apparently made aware of, and talked to Crawley about, his relationship with this student. In a letter Crawley sent the student during the summer after her graduation, he wrote, "…I had to speak with Schauff this week about my relationship with you. Denied everything and made counter accusations . . . Must close, my thoughts are with you . . . S."

Crawley reportedly had other sexual relationships with female Upper School students in the 1980's. The misconduct was apparently not reported to Catlin Gabel; the student who reported it to the investigator felt the school accepted this behavior at the time and avoided addressing it.

When contacted by Ms. Watson, Crawley denied engaging in any sexual misconduct with any student and denied having any sexual relationship with a student. When asked directly about the letter he sent to the student during the summer after her graduation, he recalled that he spoke with Manvel Schauffler about the student but said it was due to concerns about her mental health. Crawley had no explanation for why he wrote that he had "denied everything and made counter accusations" when speaking to Manvel Schauffler about his relationship with the student.

6: DEONTE HUFF

Huff was employed part-time by Catlin Gabel from 2010 to 2013. He taught P.E. and coached Middle School volleyball, basketball and track. He reportedly engaged in sexual contact with an Upper School student at his off-campus apartment. Huff ultimately pled guilty to one count of sexual abuse and luring a minor and was sentenced to 18 months in prison.

When the alleged conduct was reported to the school by a parent, the head of school (Lark Palma) reported the conduct to law enforcement and immediately terminated Huff's employment. Because Huff pled guilty to and was convicted of sexual abuse, Ms. Watson did not contact him.

SECTION 2. EMPLOYEES BELIEVED TO HAVE ENGAGED IN SEXUAL MISCONDUCT (NOT IDENTIFIED BY NAME)

1: EMPLOYEE 1

This employee reportedly made multiple explicit obscene phone calls to a 5th grade student in the 1970's. The calls were traced to the employee's home phone. Police spoke to the employee, whereupon the calls stopped.

The student's family reported the conduct to the police and to the head of school (Manvel Schauffler) and to later heads of school. It is not known what action, if any, was taken by the

school. When contacted by Ms. Watson, the employee denied making any obscene calls, denied being contacted by the police, and denied ever discussing this issue with anyone at Catlin Gabel.

2: EMPLOYEE 2

This employee reportedly engaged in sexual intercourse with a Middle School student and engaged in inappropriate conduct with female students in the late 1960's and early 1970's, as described below.

A student reported that this employee showed an inappropriate romantic interest in her when she was in the 7th and 8th grades. He reportedly told her to meet him at various locations on campus including the library, where they would have sexual intercourse. This misconduct was not reported to Catlin Gabel at the time.

The employee also reportedly "preyed upon" at least two other female students (the investigation did not reveal the underlying conduct that led to this characterization). The student's family reported the conduct to the head of school (Manvel Schauffler) and was told that the employee would not be returning the following year. The employee continued to work at the school until the end of the school year.

When contacted by Ms. Watson, the employee denied engaging in any sexual misconduct and told her he left Catlin Gabel of his own accord and not due to any concerns about his conduct. The school has no records documenting any misconduct or the reason for the employee's departure.

3: EMPLOYEE 3

This employee reportedly engaged in sexual misconduct with an Upper School student in the 2010s that included sending the student numerous personal communications over an extended period of time; communicating his personal feelings of affection toward the student; asking the student to send him photos of herself; and giving the student gifts, including underwear. This made the student feel very awkward and uncomfortable, and she found herself in the position of needing to be the one to set boundaries with this adult employee. The employee also made comments overheard by other faculty (who did not report it to the school at the time) related to students' underwear.

After the student had graduated, her family reported the conduct to the head of school (Tim Bazemore). The school promptly investigated and terminated the employee for the inappropriate conduct. When contacted by Ms. Watson, the employee declined to comment.

SECTION 3. OTHER REPORTS OF SEXUAL MISCONDUCT OR GROOMING

In addition to reports regarding the employees listed above, the investigator received other reports of misconduct. Some of these reports were second-hand and could not be corroborated with any additional evidence. Others were first-hand reports that were credible but from only one source, sometimes anonymously, and similarly could not be corroborated. Finally, the investigator fielded reports of grooming behavior that arguably did not rise to a level of sexual misconduct. We include this reported misconduct here for several reasons – first and foremost, to demonstrate that the allegations made by students have been heard and taken seriously. The information is also helpful to Catlin Gabel when the school makes decisions about future prevention efforts, including policy development and misconduct prevention training.

1. One student reported that two employees drove and picked up two students off campus. Both in the car and later when one of the employees brought the students back to his house, the employee made unwanted sexual advances and attempted to sexually assault one of the students.

2. Multiple individuals raised concerns about faculty members marrying students after they graduated. Some stated that they believed the faculty-student relationships began while the students were still attending Catlin.

3. A student noted that a faculty member was sometimes present near the shower area of the gym locker room while students were showering. The student said this made him and other students uncomfortable, and that it caused them to avoid taking showers after engaging in physical activities at the school.

4. A student came back to Catlin just after graduating to say hello to a faculty member. The faculty member spoke to her about his recent sexual fling and told her that it could be good for her to explore her sexuality before going away to college. This made her uncomfortable.

5. A faculty member commented to a student that he wanted to whisk her away to another country and keep her for himself. The student found this inappropriate.

6. A faculty member swatted student on the rear end as they left his class.

7. A faculty member invited and hosted students at his home to use his hot tub.

8. Multiple faculty members looked up female students' shorts as they were climbing.

9. A faculty member offered a private lunch with the faculty member as the prize for winning a classroom contest, which made some students feel uncomfortable.

10. A faculty member followed a student around, invited her to come to his home after school, sat with her at lunch, and asked her to come to his office at lunchtime. The individual attention was not welcomed.

CONCLUSION

This concludes the investigator's key findings. After reviewing the report, the school, through its attorney, reported all suspected abuse to law enforcement authorities. Some of the individuals we reported to DHS had already been reported previously, as described in our findings above.

SECTION 4. CURRENT POLICIES AND PROGRAMS

POLICIES

We bear the responsibility to do the best we can to provide a campus culture that does not tolerate misconduct. During the investigation, we reviewed and updated the school's current safety policies, especially as these methods and policies apply to sexual misconduct. Over the last decade, Catlin Gabel

has introduced programs, classes, trainings and policies to require and reinforce appropriate student-teacher relationships, as follows:

1. We have a wellness program for all students that covers lessons about boundaries, consent, and sexual abuse prevention. The curriculum specifically addresses our current harassment and misconduct policies in an age-appropriate way:
   a) In our younger grades, annual Safetouch lessons teach students about body safety rules and reporting issues to trusted adults.
   b) Our Middle and Upper Schools' health and wellness classes cover issues including safety, adult-child boundaries, sexual assault, how to report sexual harassment or misconduct, accessing support and resources, and consent.

2. We hold annual in-person training for all employees on the topics of mandatory child abuse reporting obligations, sexual misconduct prevention and reporting, and sexual harassment. This training sets a clear definition of professional adult-student boundaries and emphasizes the importance of maintaining those boundaries.

3. We have clear guidelines about what constitutes sexual misconduct or abuse and sexual harassment, and explicit instructions for how to report it. Please see our Family or Employee Handbooks for our policies.

4. We provide confidential and anonymous reporting mechanisms through which inappropriate conduct can be reported directly.

5. We engage in an ongoing review of abuse prevention and response practices and policies, guided by the National Association of Independent School's best practices about investigating reports of possible misconduct (available here: https://www.nais.org/media/Nais/Articles/Documents/Prevention-and-Response-Task-Force-Report-2018.pdf and RAINN, the nation's largest anti-sexual violence organization.

6. We run background checks on all employees and contractors, as well as many volunteers:

   a) We have run every current Catlin Gabel employee through a heightened background check. Beginning approximately eight years ago, we increased our level of scrutiny of employee background checks by using the Oregon Department of Education's criminal background checks for all new school employees (employment is contingent on passing this rigorous criminal background check).

   b) Also beginning approximately eight years ago, we added misconduct-specific reference checks for new employees, in which we require the applicant's three most recent prior employers to disclose in writing whether the applicant has any record of substantiated sexual misconduct as defined by Oregon law (employment is contingent on passing this reference check).

   c) We have also implemented background checks for non-employee adults who work on campus or have unsupervised interactions with our students.
      I. Since mid-2013, any contractor working for Catlin Gabel must pass a background check.

II. Since 2011, we have also required background checks for volunteers (such as parents) who work with the students in an unsupervised capacity or who accompany students on overnight field trips.

7. We currently invite parents to annual information sessions to learn about the school's current policies and practices to prevent and report misconduct.

COUNSELING

Cat**l**in Gabel is committed to supporting any student who experienced sexual misconduct. The release of these findings is intended, in part, to advance the healing of those who were harmed. We realize that for many, access to professional support is a crucial part of the healing process. To support our community, the school is partnering with RAINN, the nation's largest anti-sexual violence organization. RAINN is available for immediate crisis counseling for anyone affected by sexual misconduct 24/7/365 through the National Sexual Assault Hotline 800-656-4673 or online at rainn.org. We encourage anyone in need to call RAINN. Furthermore, the school is working with RAINN to establish a Catlin Gabel Therapy Fund to assist survivors with costs related to therapy associated with sexual misconduct experienced during their time at Catlin Gabel. More details will be forthcoming.

ON-GOING REPORTING

There is no end date to Catlin Gabel's commitment to investigate additional reports of abuse. The independent investigator Lori Watson has been engaged on an on-going basis. Anyone wishing to make a report can contact Ms. Watson directly at lori@watsonlawpdx.com or (971) 291-7672; or can leave a message for Ms. Watson via an anymous voicemail at (503) 972-1581.