

Report to the Board of Trustees of Key School



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I.	EXECUTIVE SUMMARY	1
II.	INVESTIGATIVE PROCESS	3
	A. Independence of Investigation.....	3
	B. Outreach to Key Community	3
	C. Interviews and Review of Relevant Documents.....	3
	D. Basis for Naming People and Confidentiality	4
III.	SEXUAL MISCONDUCT BY EACH RESPONSIBLE FACULTY MEMBER.....	5
	A. Eric Dennard.....	5
	1. Witness 1 on Dennard	5
	2. Witness 4 on Dennard	7
	3. Witness 5 on Dennard	8
	4. Witness 6 on Dennard	12
	5. Witness 7 on Dennard	12
	6. Witness 8 on Dennard	13
	7. Witness 9 on Dennard	13
	8. Witness 10 on Dennard	13
	9. Witness 11 on Dennard	13
	B. Richard Sohmer.....	14
	1. Witness 4 on Sohmer	14
	2. Witness 11 on Sohmer	14
	3. Witness 1 on Sohmer	15
	4. Witnesses 9 and 25 on Sohmer	16
	5. Perhonis letters on Sohmer	16
	C. Peter Perhonis.....	16
	1. Witness 9 on Perhonis	16
	2. Witness 12 on Perhonis	17
	3. Witness 13 on Perhonis	18
	D. Paul Stoneham	18
	1. Witness 3 on Stoneham	19
	2. Student C on Stoneham.....	19
	3. Student D on Stoneham.....	20
	4. Witness 14 on Stoneham	20

5.	Witness 5 on Stoneham	21
6.	Witness 1 on Stoneham	21
7.	Witness 4 on Stoneham	21
8.	Additional Reports regarding Stoneham	21
9.	Stoneham's Knowledge as a School Administrator	22
E.	Vaughan Keith	23
1.	Witness 6 on Keith	23
2.	Witness 7 on Keith	24
F.	Charles Ramos	24
1.	Witness 19 on Ramos.....	24
G.	John Sienicki	24
1.	Witness 21 on Sienicki.....	25
2.	Witness 23 on Sienicki.....	25
3.	Witness 20 on Sienicki.....	25
4.	Witness 22 on Sienicki.....	26
H.	Tad Erickson	26
1.	Witness 24 on Erickson	26
2.	Witness 22 on Erickson	26
I.	William Schreitz	27
1.	Witness 26 on Schreitz	27
IV.	INTERVIEWS WITH ADMINISTRATORS.....	27
A.	Former Headmaster David Badger	27
B.	Barbara Vaughan, Admissions	28
C.	Former Headmaster Rodney Beach	29
D.	Former Headmaster Ronald Goldblatt	29
E.	Former Head of School Marcella Yedid.....	32
F.	Head of School Matthew Nespole.....	32
G.	Chair of Board Joseph Janney	33
H.	Other Faculty Members.....	33
V.	OTHER REPORTS AND INFORMATION PROVIDED.....	34
A.	Hard Drive to Anne Arundel County Police.....	34
B.	Minutes	35

C. Other Reports	36
VI. THE SCHOOL'S HISTORICAL RESPONSE	37
VII. SPECIFIC CONCLUSIONS	40

I. EXECUTIVE SUMMARY

This report ("Report") contains a summary of an investigation into allegations of sexual abuse and improprieties at the Key School ("the School" or "Key") and a review of the School's response, if any, at the time of the alleged occurrences or any report of those occurrences. The Report responds in part to concerns raised by a group of alumni under the moniker #KeyToo, after the #MeToo movement and the Larry Nassar sentencing hearing focused the nation's attention on sexual harassment and abuse. It also follows up on concerns raised more than twenty years ago by a particular alumna, who presented prior administrations with significant information concerning past sexual abuse by faculty members and by some who remained on staff. As set forth in greater detail below, this former student's ongoing attempts to get the School to acknowledge its history, and the current administration's willingness to do that, led in large part to this Report.

The Key School was founded in 1958 by several faculty members at St. John's College in Annapolis with the goal of creating an educational environment that provided a classical curriculum in small classes and fostered independent thinking even in young children. Dozens of former students reported to us that they valued the education they received at the School as well as the informal and progressive social atmosphere that generally existed at the School. As set forth below, however, our investigation confirmed allegations that in the 1970s a group of teachers took advantage of this atmosphere, abusing their roles as teachers to sexually exploit students and targeting in many cases students who were members of families suffering from various pressures resulting in less family supervision. We conclude that the School failed to protect students from these teachers and, further, that in each of the occurrences described below, there were other adults in the Key School community, including members of the faculty and staff, administrators, and Board members, who were aware of the abuse and inappropriate conduct and chose not to intervene.

Some of the most serious misconduct alleged concerns acts by Key School teachers Eric Dennard ("Dennard"), Richard Sohmer ("Sohmer"), Paul Stoneham ("Stoneham"), Peter Perhonis ("Perhonis"), and Vaughan Keith ("Keith") in the 1970s. Dennard taught art at the School from 1969-78; Sohmer taught a variety of subjects and directed school plays and informal music groups in the 1970s; Stoneham worked for the School from 1969-2015, teaching European and Russian History, serving as the Head of the Upper School from 1978-84, and functioning as the School's college advisor from the mid-1980s until he left; Perhonis taught ancient civilizations from 1969-78 and then returned to teach at the School in the 1980s; and Keith taught at the School from 1972-76.

The School's response (or lack thereof) to their misconduct spans decades, including not just a failure to intervene at the time of the abuse, but a decision in 1993 to host a memorial service for Dennard — one of the main perpetrators of the misconduct, who one witness estimates abused as many as 25 students. At that service, a former

student and survivor stood up and publicly asked the assembled group why the School was honoring someone who had "f*ck'd" her when she was 14 years old. The service revealed two important points: first, that the effects of abuse were not over for the survivors; and second, that the School had not come to terms with the fact of the abuse.

The memorial service also inspired another alumna, Carolyn Surrick, to come forward to the School in 1996 with specific information concerning the sexual abuse in the 1970s.¹ Ms. Surrick's efforts led the School to commission an investigation into past abuse and, ultimately, to report multiple incidents to the authorities. The School, however, allowed Stoneham, the School's college advisor and a former Head of the Upper School, to remain on the faculty, despite the fact that he almost certainly was aware of, and involved in, the events as they occurred in the 1970s. Further, outside of the discussions with Ms. Surrick, the School never offered any acknowledgement to survivors — public or private — of the School's failure to have kept them safe until recently.

As detailed below, in the course of this investigation 57 witnesses — including former students and current and former teachers, administrators, and Board members — have come forward with information concerning sexual abuse in the 1970s as well as occurrences in the 1980s and 1990s. Former students have described the abuse they suffered and its lasting effect on them; former and current faculty members and administrators have described their heartbreak and regret at not doing something, or something more, at the time of the abuse; and additional alumni and faculty members have come forward to express their support for their former classmates and students and the hope that the School will acknowledge this history and ensure that it never repeats itself.

This Report includes a synopsis of the interviews we conducted and the documents we reviewed over an eight-month period; it also contains the conclusions we arrived at based on that work. The Report does not contain recommendations for next steps as we view that as outside the scope of our retention.

Our intention is to allow the interviews and documentary evidence to speak for themselves as much as possible without characterization outside of the conclusions contained in Sections VI and VII. This Report will be disturbing to read, and we recommend reader discretion. We hope, however, that its publication will also be a small step toward institutional improvement, healing and reconciliation.

¹ Ms. Surrick has consented to the use of her name in connection with her efforts over the years to get the School to acknowledge and address the abuse.

II. INVESTIGATIVE PROCESS

A. Independence of Investigation

Current Head of School Matthew Nespole and Board Chair Joseph Janney retained us to conduct an independent investigation into the allegations of past sexual abuse and improprieties by members of the Schools' faculty. Before being retained, we ensured that Kramon & Graham ("K&G") had done no previous work for the School. In addition, none of the K&G attorneys who worked on this investigation had prior connections to the School. After our initial retention, we did not receive or take direction from anyone in the administration of the School or on its Board of Trustees as to the scope of the investigation or the contents of this Report. Nor did they attempt to direct us. We have, however, issued several requests for documents to the School and interviewed members of its administration in the course of the investigation, and the School was cooperative in the process. The School has paid our invoices, but has neither sought nor obtained legal advice or counsel from us as would typically be the case in an attorney-client relationship.

B. Outreach to Key Community

At the outset of the investigation, the School's administration sent an invitation to everyone in its alumni, faculty, and student databases to contact us if they wanted to provide information relevant to the subject of our investigation, and posted our contact information on the School website. (As of January 22, 2019, that information was still available on the School's website.) Additionally, some of the alumni who were the impetus for the investigation have helped to get our contact information out to people in other communities. When names of people who might have pertinent information have been mentioned in interviews, we have attempted to locate these potential witnesses and have followed up with requests for interviews. Additionally, the publication of an article in *The Washington Post* on August 18, 2018 concerning sexual abuse at the School produced a second wave of witnesses and concerned alumni who have contacted us.

C. Interviews and Review of Relevant Documents

We interviewed 57 people, several on multiple occasions. We reached out to an additional 16 people (again, several on multiple occasions), who have either declined to participate in an interview or did not respond to our inquiries. Given the passage of time since some of the events described in this Report, we have learned that several people with relevant information are no longer living.

We have reviewed minutes from the School's Board of Trustee meetings, documents provided by interviewees, yearbooks, the files from two prior (and related) investigations in the 1990s, and the personnel files for the School's faculty members whose names came up in interviews when those files could be located.

Unfortunately many of the personnel files we requested were not available. They were destroyed in a flood in an administrative building at the School over Thanksgiving weekend in 2013. We obtained insurance documents concerning the flood and also interviewed an administrative assistant involved in the clean-up after the flood to corroborate what we had been told concerning the timing of the flood and the fact that the majority of the School's archived personnel files were lost at that time.

D. Basis for Naming People and Confidentiality

We have determined generally to keep the names of witnesses and survivors confidential, except as set forth below. We recognize that several of the witnesses and survivors whose statements are included below were identified in the August 18, 2018 *Washington Post* article. We have not identified those individuals in this Report both for consistency with our treatment of other witnesses and because we sought to avoid any subconscious bias that might arise in readers familiar with certain allegations through that article and reaction to it on social media. The Report uses "Witness" together with a unique number to refer to people who provided us with information. The Report uses "Student" with a unique letter to refer to the former students whom we were unable to reach. Additionally, in places we have omitted the specific year of graduation or personal details of a witness or survivor if those details are not necessary to understanding the survivor's particular situation and would allow some in the Key community to easily identify a survivor or witness. During the late 1960s and 1970s, the Upper School student body was extremely small, with graduating classes as small as eight students.

Where there has been a report of abuse and some independent corroboration of the report, we have named the identified perpetrator in this Report, with one exception described below. We define "independent corroboration" as evidence, whether documentary or testimonial, that came from sources other than the alleged victim. Documentary evidence includes both writings that were created contemporaneously at the time of the incidents and reports made to local police departments, whether those were made at the time of the abuse or at a later date.

There is one perpetrator who has been identified in interviews and who is also a confirmed survivor. Because there is a clear connection between the nature of the abuse this person suffered and then inflicted on others we have determined not to identify her in this Report. By doing so we do not mean to suggest that the reports of abuse involving her are any less credible than the others contained in this Report or that the School has any less responsibility for that abuse.

A difficult issue that we confronted in the course of finalizing this report was the effect of naming faculty members who were identified in the course of a witness's statement but not as the perpetrator of sexual misconduct. The identification of these other faculty members was often a part of the witness's account; it also assisted us in assessing the credibility of the witness. We want to be absolutely clear, however, that to

the extent this Report includes the names of faculty members outside of the clearly identified perpetrators (*see* conclusions in Section VII, *infra*), it is not intended to suggest that we have concluded that the named faculty member did something wrong. Similarly, we concluded that a description of interviews with current and former members of the School's administration was important to the Report's completeness. Again, however, the inclusion of those interviews does not mean that we have concluded that each named administrator did something wrong. Our conclusions are contained in the final two sections of the Report, which describe the School's historical response and our specific conclusions.

The balance of the Report is organized as follows. Section III describes the corroborated reports of sexual abuse or harassment, organized by each responsible faculty member. Section IV summarizes our interviews with administrators and faculty members. Section V describes the additional documentary and electronic information provided to us. Section VI describes the School's response to the misconduct and our conclusions regarding that response. Finally, Section VII sets forth our specific conclusions.

III. SEXUAL MISCONDUCT BY EACH RESPONSIBLE FACULTY MEMBER

A. Eric Dennard

Dennard taught art at the Key School from 1969 to 1978. In interview after interview, he was identified by former students as one of the primary forces behind a subculture in the 1970s that encouraged sexual relationships between teachers and students alongside rampant drug and alcohol abuse. Leaving aside whether a teenage student can legally or effectively consent to a sexual relationship with a teacher in any circumstance, multiple witnesses made credible reports that Dennard had forcibly raped them. As set forth below, his "significant other" at the time estimated that he had sexual intercourse with 25 Key students while he was on the School's faculty. We interviewed nine of these students during the course of this investigation. Dennard died in 1993.

1. *Witness 1 on Dennard*

Witness 1 was a student at the School in the early 1970s. Her mother taught at the School throughout this period and her family lived on the campus. In October of her junior year, Witness 1's boyfriend died in a car crash; she was, according to multiple witnesses, devastated. She stopped going to class and, instead, spent all of her time in the School's pottery studio. Dennard stepped into the void. Witness 1 reports that they were having sexual intercourse at his apartment within a couple of months of her boyfriend's death. She resisted early on, but Dennard continued to pursue her and she gave in.

After Christmas of the same year, then Headmaster² David Badger came to Witness 1 and told her she needed to return to class. She has no recollection of anyone else reaching out to her during this period or anyone questioning the amount of time she was spending with Dennard.

During the spring that followed — again, while she was still a junior — Dennard forced Witness 1 to participate in sexual interactions with him and with other (adult) women. He also periodically became violent with her. A classmate of hers, Witness 2, reports that during this period she walked into the pottery studio in the Art Barn and saw Dennard "looming over" Witness 1 from behind at the potter's wheel, "groping, massaging, rubbing her chest." Witness 1 was sobbing. Neither Dennard nor Witness 1 saw Witness 2, and Witness 2 quickly left. She did not tell anyone what she had seen.

During her senior year, Witness 1 moved in with Dennard, going back to her own family's house a couple of nights per week. (She believes that her father did not know what was going on and that her mother's attention was focused on a new baby.) Witness 1 reports that throughout this period Dennard provided, and they both consumed, significant amounts of alcohol and marijuana at his apartment.

Witness 3 reports being well aware when she was in 8th grade (and Witness 1 was a senior) that Witness 1 was living with Dennard. She recalls caroling at their apartment with faculty members and other students, and working at faculty parties where Witness 1 came as Dennard's date.

After her high school graduation Witness 1 left Annapolis to go to college, but Dennard kept in regular contact and, after only a year, she left college and moved back to Annapolis. Again, she moved in with Dennard.

During this period, according to Witness 1, there were ongoing parties that included both faculty members and students at the house in Eastport where Witness 1 and Dennard lived and also in the apartment of former Key teacher, Keith. Witness 1 reports that Dennard arranged multiple orgies involving Key students during these years. She reports that she believes that Stoneham, soon to be Head of the Upper School, was well aware of the partying and sexual activity among students and faculty members that was going on. Several witnesses report seeing Stoneham at some of these parties.

² Historically, the top administrator at Key was referred to as the "Headmaster" and administrators who reported to the Headmaster and led each of the school divisions were called "Heads of School." In recent years, the names of those roles have changed. "Head of School" is now used for the top administrator at Key; "Division Head," for the administrators leading the Elementary, Middle, and Upper Schools. In this report, we use the title by which the person was designated at the time of his or her tenure at Key.

In the spring of 1978, Dennard was asked to leave the School. Victim 1 states that Dennard was falling apart at this time and that she threatened to leave him. He made two suicide attempts during that summer and, in response, she agreed to marry him. Throughout this period he was physically abusive, throwing her against walls and choking her on multiple occasions.

Witness 1 estimates that Dennard had sexual intercourse with approximately 25 students from the School during the years she was living with him. She believes that this sexual activity with students ended when he stopped teaching at the School.

Dennard's unchecked access to Witness 1 during her time at Key continued to negatively impact her life after she graduated. Once Dennard was no longer at Key, Witness 1 reports that he focused his abuse more exclusively on her. Dennard and Witness 1 moved to the Eastern Shore and both became sober in 1983, but Dennard continued to be abusive. After several years of therapy, Witness 1 left Dennard.

2. *Witness 4 on Dennard*

Witness 4 was a student at the School from the late 1960s until the mid-1970s. When she was 13 years old, her mother dropped her off at Dennard's home so that Witness 4 could show him her artwork. Witness 4 believes that Dennard was aware that things were not stable in Witness 4's household at that time; he knew Witness 4's mother well as she, too, taught at the School, and Witness 4's parents were on the verge of separating. Dennard flattered Witness 4, telling her she was beautiful and smart, that she had choices, and that she could do anything she wanted with her life and with her body. He performed several sex acts on her that day. Several days later she rode her bike to his home and had sexual intercourse with him. Witness 4 believes that he understood that she was there to lose her virginity, at 13 years of age.

Months later, Dennard told Witness 4's mother that he would give Witness 4 a ride home from school. He told Witness 4 he needed to stop at his own home first. By this point in time, Witness 4 did not want to have sexual intercourse with Dennard and did not want to be alone with him. At his home she let him know she did not want to have sexual intercourse. Dennard, however, was not interested in how she felt and, after giving her a marijuana joint, ignored her attempts to push him away, and forcibly raped her.

Not long thereafter, Witness 4's parents separated and Witness 4 and her mother moved onto the School campus. Dennard asked Witness 4 to come to the photography dark room after school. When she got there he locked the door, and they had sexual intercourse.

Before too long, Witness 4 realized that she was pregnant. She was 14 years old. She confided to another teacher, Sohmer, that she was pregnant, and he told her to go to Dennard and ask him to pay for an abortion. Dennard at first denied that it could be he

who got her pregnant, but then agreed to give her \$250.00 for an abortion. She told him that an abortion would be more expensive than that. Dennard's response was that she would have to get the rest of the money from someone else. (He suggested that Sohmer could also pay and told her that everyone knew she was having a relationship with Sohmer.) Ultimately, Sohmer drove her to Washington, D.C. to the Laurel Clinic to obtain an abortion.

Witness 4 believes that Dennard took and kept photographs of students in the nude and in sexual poses. She understands that he handed those photos off to a local photographer, whom Dennard viewed as a protégé of some sort. When Witness 4 approached that photographer about the photos he told her that he did not want to keep them or pass them onto anyone else and so destroyed them. The photographer did not respond to our requests for an interview.

3. *Witness 5 on Dennard*

Witness 5 came to the School in 1975 as a 7th grader. As a 14-year-old in the 9th grade, she took an art course taught by Dennard and Witness 1. Dennard taught the class for the 1st and 4th quarters of the school year. Witness 1 taught the course for the 2nd and 3rd quarters.³ Witness 5 quickly became the "teacher's pet" and was frequently identified to other students as an example of both a talented and knowledgeable student.

Dennard and Witness 1, who were living together, asked Witness 5 to help Witness 1 work in her pottery studio at their home in Annapolis (on Chesapeake Avenue). Witness 5 went there with them after school on a regular basis during the winter of 1977-78 and, at some point, they started giving her alcohol and encouraging her to drink. During this period they took her to a party in Eastport; at that party, she admitted to them that she had a crush on a particular boy in the junior class ("Student A").⁴ Not long after, Dennard told Witness 5 that he and Witness 1 had invited Student A over to their home and that Witness 1 had had sex with him.

³ Witness 1 disputes that she was ever a member of the faculty. Witness 5, however, provided us with two Key School report cards for her 9th grade art class signed by Witness 1. Additionally a separate witness, Witness 11, advised that Witness 1 taught Witness 11 and that Witness 11 also believed Witness 1 was a faculty member. Witness 1 admits that she frequently covered art classes for Dennard and did in fact complete report cards for Witness 5. Whatever Witness 1's employment status, we conclude that given her substantial role in at least one art class, Witness 1 was an apparent agent of the School.

⁴ We are referring to this former student as "Student A" and not as a "Witness" because we did not have the opportunity to speak with him. Student A died in Florida in May 2012. We applied this method of identification throughout so that individual students who had knowledge of relevant issues and occurrences, but whom we were unable to

In April of 1978, Witness 5 and Student A went to Dennard's and Witness 1's home and hung out and drank beer. Dennard and Witness 1 asked Witness 5 and Student A to stay overnight at their house, which Witness 5 and Student A agreed to do. Witness 5 remembers Dennard leaning into her; she remembers Witness 1 and Student A having sex; she remembers Dennard and Student A having sex with her and that it hurt; and she remembers Dennard demonstrating on Student A how to engage in particular sexual acts. The next morning she remembers lying in Dennard's and Witness 1's bed as Dennard, Witness 1, and Student A had sex; she recalls that the others decided to leave her alone that morning. She remembers Dennard and Witness 1 driving her home in their white van.

Witness 5 recalls spending time with Witness 1 and Dennard not long after that night and that they were alarmed when they realized she was not on birth control. Witness 1 took her to a clinic to rectify that situation by obtaining a prescription for birth control pills.

From that point on, Witness 5 recalls multiple group sex sessions that involved Dennard, Witness 1, Student A, and Witness 5, and alcohol. She recalls Dennard instructing Student A to try particular sexual acts and remembers thinking that Student A was in significant physical and emotional pain as Dennard, with Witness 1's assistance, bent him into different positions.

On one occasion Dennard, Witness 1, Witness 5 and a 25-year-old former Key student went to Witness 1's parents' house. The 25-year-old had sexual intercourse with Witness 5.⁵ He contacted her in February 2018 (as the "KeyToo" movement's presence on the internet expanded), to apologize and told her that Dennard had essentially "offered her" to him. Witness 5 was 14 years old at the time.

Witness 5 also remembers hearing of one occasion on which Dennard became violent with Student A. No one would tell her what prompted Dennard's anger, but at some point Student A stopped coming to these sessions, and the primary focus of both Dennard and Witness 1 shifted to Witness 5 exclusively. Dennard and Witness 1 later asked Witness 5 to bring boys or men she was interested in back to their house to join them in sexual activity.

In June of 1978, Dennard's contract at the School was not renewed for the following year. Nevertheless, he and Witness 1 remained a part of the School social scene, and Witness 5 continued to spend significant time with them. Former Key teacher, Keith, who had recently been fired after it was discovered he was having a sexual

interview, are referred to by "Student" and a letter, as opposed to "Witness" and a number.

⁵ Witness 5 did not identify this former student to us.

relationship with a student, and Stoneham were present at some of the social occasions involving Dennard, Witness 1, and Witness 5, who was still a Key School student.

Stoneham, the Head of the Upper School at that time, noticed a change in Witness 5's grades and brought her into his office a number of times during that period. Witness 5 is certain that Stoneham knew that she was spending significant time with Dennard and Witness 1 because she saw Stoneham at parties attended by teachers and students and at local hang-outs. However, Stoneham never asked her about it and never expressed concern that she was socializing with Dennard and Witness 1. Witness 5 believes that Stoneham and Dennard were friends.

Gretchen Nyland, who was also a teacher at Key, was present at Dennard's and Witness 1's home a couple of times when Witness 5 was also present and seemed very uncomfortable on those occasions. However, she never told Witness 5 that she should not be spending time with Dennard and Witness 1.

Witness 5 recalls at some point that Dennard and Witness 1 told her that that they would need to be more "discrete," suggesting that someone had said something to them about their relationship with Witness 5. Again, however, Witness 5 has no memory of anyone from the School counseling her about the amount of time she was spending with Dennard and Witness 1 or trying to learn what they were doing while spending out-of-school time together.

At some point while Witness 5 was still a student, Dennard and Witness 1 told her that they were going to get married and be monogamous, and that while they all could remain friends, they would no longer have group sex with her.

Somewhere around this time, Witness 5 confided in her half-sister, who was in her 20s and lived out-of-state, as to what had been going on over her freshman and sophomore years. Sometime after, it was "like a bomb went off." Her parents had spoken with her half-sister and learned what had been going on with Dennard and Witness 1 and were very upset. Witness 5 went over to Dennard and Witness 1's house for comfort; but Dennard and Witness 1 slammed the door on her and chastised her for not being "more mature than that." They told her she should not have told anyone about their activities.

Witness 5 reports that the period that followed was very difficult. Dennard and Witness 1 "cut her off" and were openly hostile whenever they saw her. Witness 5's mother confronted Stoneham about the situation and called him multiple times. Witness 5 recalls her mother quoting Stoneham's response: "They don't work here anymore," referring presumably to Dennard and Witness 1. Per Witness 5, her mother never got over the discovery that her daughter had been victimized by Dennard and Witness 1. Witness 5 recalls her mother often stating that she blamed Stoneham for what happened. She told Witness 5 that she had contacted Stoneham for advice when Witness 5 began

visiting Dennard and Witness 1's house during her 9th grade year, but did not recall him being concerned.

During Witness 5's senior year, when she was trying to get into college, her father went to the Headmaster, who at that point was Rodney Beach. Witness 5 understands that her father told Mr. Beach, "you know what happened to [Witness 5] with those teachers; you need to help her." (This exchange is confirmed by notes of an interview taken of her father during the 1996 investigation.) Witness 5 was accepted to college not long after that.

Many years later, in 1993, Witness 5 learned that Dennard had died and that the School would be hosting a memorial service in Dennard's honor. She decided she needed to attend. She recalls entering the gym for the service and seeing Witness 1 and Stoneham, both of whom appeared surprised to see her. When there was an opportunity for attendees to speak, she stood up and asked, "why is the [S]chool honoring the guy who f*ck'd me when I was 14?" She then read from a prepared letter to Dennard describing the sexual abuse and how it had affected her. Witness 5 recalls that both Witness 1 and Stoneham appeared angry with her.⁶ But more than anything Witness 5 recalls the silence that followed her remarks. Witness 5 recalls that the only person who talked with her after the memorial service was Dennard's first wife, Lynn, who followed her out and comforted her.

Witness 5 stated that sometime after the memorial service the then Headmaster Ronald Goldblatt called and asked her to come in and meet with him. At the meeting, he apologized to her, but denied that there was any institutional responsibility. Witness 5 said she asked Goldblatt why Stoneham, who was married to a former student and had known about what happened to her at the time, was still at the School; Goldblatt told her that he understood that Stoneham had not begun to date his wife until she was 18 years old and that Stoneham denied having any prior knowledge of the sexual abuse Witness 5 had suffered.

Around the same time Witness 5 was contacted by another former student, who had had similar experiences with Dennard (described elsewhere in this Report). Other than a brief conversation with two former teachers whom she ran into at a grocery store, Witness 5 was not contacted by anyone at Key School about what she had experienced with Dennard and Witness 1.

Several years later (in 1996), Witness 5 was at a family wedding in Maine that Key teacher Lee Schreitz also attended. A relative told Witness 5 that at the wedding festivities Ms. Schreitz was talking about Witness 5's reported prior sexual activity to

⁶ She learned later from her employer that following the memorial service Witness 1 and others had contacted the employer to create problems for her.

wedding guests. Witness 5 confronted Ms. Schreitz in April 2018 about the comments she had made, and Ms. Schreitz apologized.⁷

In 1997, a detective from the Anne Arundel Police Department contacted Witness 5, apparently as part of an investigation being conducted at the School. Witness 5 made a report detailing the events described above. No one from School, however, reached out to her in connection with the investigation.

4. *Witness 6 on Dennard*

Witness 6 attended Key in the mid-1970s. She was a student of Dennard's. Early on he encouraged her to come over to his apartment, where they would drink beer and smoke cigarettes. At one point she was there with Witness 1 (who at the time was still a student), and Dennard asked them to sleep over. Witness 6 remembers lying in bed between the two of them and being "just frozen." The experience was completely beyond her prior experience. She recalls feeling scared but privileged at the same time. From there, it became a way of life — whenever she would go somewhere with Dennard and the other student, sex would be involved. At some point Dennard and the other student took Witness 6 to a party that Key teacher Keith was hosting. Her experiences with Keith are described below. As noted there, she later concluded that Dennard had "handed her off" to Keith.

5. *Witness 7 on Dennard*

Witness 7 attended Key for her junior and senior years in the 1970s. She had wanted very badly to leave her prior school and used college savings to cover her tuition at Key. Her parents had gone through a divorce, and her situation at home was "horrific." At some point, Stoneham approached her about leaving her home and moving in with a family on campus. She believes the School was trying to help her by allowing her to distance herself from her family turmoil and described the mother of that family as very kind. She recalls going with that mother and other friends to parties at Keith's apartment, with whom she eventually had a relationship (but who by that point was no longer teaching at the School). She stated that she does not believe Keith harmed her, and that she never saw him engage in exploitative behavior. Dennard, on the other hand, she believes was "extremely predatory." She viewed Dennard as "the center" of what was going on at the School and said that he sexually exploited her and others and that he encouraged a lot of female to female activity. He had sexual intercourse with her when she was 16 or 17 years old and a student.

⁷ We have seen no evidence suggesting that Ms. Schreitz knew about the abuse of Witness 5 at the time it was occurring.

6. *Witness 8 on Dennard*

Witness 8 was also a student at Key during the 1970s. She reported that she participated in parties that involved teachers and students from the time she was 14 years old and that these parties were common knowledge among many of the students and faculty members. During this period (and while she was a minor and a student), she had sexual intercourse with Dennard.

7. *Witness 9 on Dennard*

Witness 9 also attended Key during the 1970s and had art class with Dennard. It was a morning class, and she reports that she was frequently the only student to show up. After she missed school one day, Dennard met with her and told her that she "needed a day of therapy." He drove her to a liquor store where he obtained liquor and then took her to a bird sanctuary where he "taught" her how to perform fellatio.

8. *Witness 10 on Dennard*

Witness 10 attended Key during the 1970s and was a member of Dennard's art group. He was very aware of the relationship between Dennard and Witness 1 during Witness 1's senior year. During this period he saw Dennard in a drunken state on multiple occasions and described him as "out of control." He recalls going on a trip to New Hampshire with Dennard and a group of approximately eight students for an art opening. They camped in the area. Witness 10 recalls that something akin to an orgy occurred. He recalls being extremely uncomfortable with the situation. He also recalls seeing Dennard attempt to engage in oral sex with a female student, who laughed and told Dennard to get away.

9. *Witness 11 on Dennard*

Witness 11 described Dennard as being "very tricky." She said he would choose female students who were vulnerable to exploitation, perhaps either because of family instability or some emotionally upsetting event. For example, Witness 11 reports being aware that as soon as Witness 1's boyfriend was killed in an accident, Dennard targeted her. Witness 11 believes Dennard saw her in a similar light because her mother was emotionally unstable and her father was an alcoholic. Dennard would suggest to Witness 11 (and to other students in similar situations) that they go to a coffee shop with him. He would speak critically of Sohmer (whom, as detailed below, was in an inappropriate relationship with her at the time) and tell Witness 11 that she should not spend time with Sohmer but rather spend time with Dennard in the art room. There were occasions during the day when she could smell alcohol on Dennard. She believes there was something of a power struggle occurring between Dennard and Sohmer, and she believed there had been a struggle or competition over Witness 4. Witness 11 never had a physical relationship with Dennard.

B. Richard Sohmer

Sohmer taught mathematics, directed plays, and facilitated rehearsals and performances for several informal Key-related music groups during the 1970s. His tenure at the School was relatively short, but during that time he engaged in sexual relationships with multiple students (and other faculty). According to several accounts, he used the plays and musical productions to develop relationships with young girls. He has not responded to our attempts to arrange an interview with him.

1. *Witness 4 on Sohmer*

Witness 4 was in several plays that Sohmer directed. When she was 13 years old, he held and kissed her after a rehearsal. From that point on, he would signal to her during rehearsals, and she would know she was to meet him in an empty room nearby. After months of this, Witness 4 had sexual intercourse with Sohmer in an empty second grade classroom. Witness 4 reports that eventually Sohmer told her that Headmaster Badger had called him into his office and confronted him about rumors that Sohmer was "messaging around" with Witness 4. Mr. Badger reportedly told Sohmer this would need to stop. Not too long later, however, Witness 4 became aware that Sohmer was seeing another student, Witness 11. (As set forth below, Witness 11 confirms that prior to Sohmer's solicitation of her, she was aware that Sohmer had been involved with Witness 4.)

Witness 4 also later learned that Sohmer had been having an affair with Witness 4's mother around the same time he was seeing her. Witness 2 reports that at some point Sohmer's affair with Witness 4's mother became well-known. Witness 2 took a class on the first floor of the home in which Witness 4 and her mother lived. Witness 2 reports that Sohmer would come downstairs in the morning in a disheveled state and then would walk through the students to leave the house.

2. *Witness 11 on Sohmer*

Witness 11 attended Key starting in the late 1960s at age 11. She was in Sohmer's geometry class and also actively involved in the School's plays and musical groups, and played a major role in a School play at age 15. During this time, Sohmer flirted with her, but nothing more. When she was 16, however, he kissed her during a break from a rehearsal.

The relationship intensified when she filled in for a teacher who could not participate in a particular play. From that point on, Witness 11 spent substantial time with Sohmer, including hours in the bedroom he rented from an area resident. (This last fact has been confirmed by Witness 25, who had personal knowledge of the residence at the time.)

Witness 11 understood that Sohmer had been involved with another student and had been "warned off" continuing the relationship with that student. Looking back on it, she does not know why he was not fired at the time. She recalls walking alone with him on campus by the basketball court and him turning and telling her that he "[couldn't] imagine living without you." Her own home life was dysfunctional, and he was aware of that.

When in 1975 she advised her parents about the relationship with Sohmer, they were extremely upset. Her father, who was a member of the Board of Trustees, advised the School about Sohmer's improper relationship with Witness 11 (who was still a student) and resigned from the Board due in part to the situation. Sohmer was fired in 1975.

At the time Witness 11 felt that it was she who had done something wrong — that she had cost Sohmer his job and that she had acted inappropriately. Despite multiple reports that the Board and the administration were apprised of Sohmer's inappropriate relationship with Witness 11, and that the relationship was common knowledge, no one from the Board, faculty, or administration reached out to her to correct this perception or to take other responsible action; no one from the Board, faculty, or administration reached out to her at all.

After high school graduation, Witness 11 moved in with Sohmer and deferred going to college. She sang and played woodwinds in the Nymphs and Satyrs, a name that Sohmer gave to the musical group that included him, Witness 11, Witness 4, another student, and, at times, Key teacher Nancy Surrick. Finally, at age 25, with the assistance of therapy, Witness 11 left Sohmer and terminated the relationship.

Witness 11 reports that she knows Stoneham was aware of her relationship with Sohmer long before she told her parents; he had written, "Have a nice Sohmer" in her yearbook.

She noted in her interview that as a general matter there was a "murky" lack of proper boundaries between adults and students at the School. She believes that the students who spent most of their time in the art facility doing artwork "got it worse" than the students who were more active in music and theater.

3. *Witness 1 on Sohmer*

Witness 1 reports that while a student she had sexual intercourse with Sohmer. She never let Dennard know about that because she sensed that Dennard and Sohmer were very competitive and that Dennard would be very upset.

4. *Witnesses 9 and 25 on Sohmer*

Witness 9 advised that on one occasion while a student she "necked" with Sohmer in his van. She believes she was in 11th grade at the time. He was directing a play, and she was in the play. Witness 9 reported that Sohmer would supply marijuana to students and that "making out" was frequently involved. Witness 25 confirmed this description and reported multiple outings with Sohmer and Upper School students in Sohmer's yellow van.

5. *Perhonis letters on Sohmer*

As noted, Sohmer's relationship with Witness 11 appears to have been well-known on campus. Witness 10, for example, noted that it was common knowledge that Sohmer was having an ongoing relationship with Witness 11 (and before that with Witness 4). Another teacher, Peter Perhonis, took a sabbatical during the 1974-75 school year and wrote letters back to a student with whom he had had a sexual relationship. In a March 1975 letter he stated that he had heard that Sohmer had been fired because of his relationship with Witness 11 and asked the student to send him details. In a later letter, which we reviewed, he provided his perspective on the situation:

the facts are, I guess that [Witness 11] is not legally an adult, as silly as that may seem. When she leaves her father's house and is in college it's a different matter. I can't blame her parents really, certainly not the [S]chool. I think myself that [Witness 11] might have done well to pick a different sort of man both now and later and as for Richard I believe he's already been married twice and, while I never disliked him, I couldn't take much interest in him because he struck me as scatter-brained.

C. Peter Perhonis

Perhonis taught Greek and ancient civilizations at the School in the 1970s, and, after several years away from the School, he returned in the fall of 1987 to teach again. He was controversial according to former students and faculty members: There were students who viewed him as an excellent teacher; others viewed him as needlessly cruel to students; still others saw him as simply odd.

We attempted to reach Perhonis on two occasions, but he did not respond to either request. We understand that he is very ill.

1. *Witness 9 on Perhonis*

Witness 9 entered Key in the 7th grade in the early 1970s, at the age of 12. Her family life was chaotic. She had moved abruptly with her mother and three siblings to Annapolis and away from her father, who had serious mental health issues.

Witness 9 was in Perhonis's ancient Greek class in the 7th grade. He began "grooming" her almost immediately, sitting very near her to look at her work and telling her how smart she was. He kissed her when she was in the 8th grade.

When she was 15 years old she was in a community theatre production with him. He started to give her rides home, but would stop at his own home on the way back. Witness 9 reports that he would give her advice (including, for example, how dangerous boys her own age were) and make sexual overtures. Though they did not have sexual intercourse at that time, he would undress her and take her to bed at his house. This happened approximately five times. After the play was over, he "dropped her."

Witness 9 told Stoneham about Perhonis's relationship with her. Stoneham made it clear that he was well aware of it, stating, "I know baby, I've got eyes!" This conversation occurred at a meeting that Stoneham initiated because she had been absent from class.

After Witness 9 graduated, Perhonis joined the Merchant Marines for a period of time and wrote long and detailed letters to her. Witness 9 provided us with copies of the letters, which confirm the prior sexual relationship that had commenced while she was still a Key student. At some point their relationship resumed even though she was living in New York and he had returned to Key and was living in Maryland. When she was in her early 20s, he came to New York to visit her and, in the course of that visit, mused about killing her, specifically about beating her to death. He did not act on the statements. However, she told her family what he had said, and they insisted that she break the relationship off. She ultimately broke up with him over the phone; he responded that her brother must have "gotten to her." He later showed up at Witness 9's mother's home in Annapolis, screaming in the front yard. Several years after the termination of the relationship he tried once again to contact Witness 9. As a result of Perhonis's abuse of her, she has felt "disconnected," self-conscious, and inferior, and has spent 35 years in therapy.

2. *Witness 12 on Perhonis*

Witness 12 described an experience with Perhonis in the 1990s that parallels the 1970s experience of Witness 9 in several respects. Witness 12 reported that she was a student in Perhonis's ancient civilizations class as a 14 year old and soon became one of his "favorites." By age 15 she was having "private lessons" in Latin and Greek with Perhonis in empty classrooms and, at times, the hallways. During those lessons they would translate texts with a sexual theme; at one point Perhonis told her that his favorite passage in a particular poem was when an older Greek man came upon a youth having sex with a girl and anally impaled the youth further into the girl. She recalls that he sat very close to her in these lessons and that the attention flattered her and made her feel grown up. On one occasion she dropped something and leaned over to pick it up; he told her she had "made his month" because of the view of her underwear under her skirt. Not

long after that, he invited her to go to the National Gallery with him in Washington, D.C., to see an exhibit of Greek sculpture. He said she could meet him at school and he would drive her to the exhibit. When her parents realized that she was the only student invited, however, they forbade her from going.

Perhonis sent books and letters to her over the summer at her work address. He continued to write to her after she went to college. Witness 12 has been unable to locate those letters, but reports that they were very similar to the portions of the letters to Witness 9, which were quoted in *The Washington Post*.

Witness 12 reported that she discussed Perhonis with a friend of hers, Student B, who was two years younger, while both were Key students. Student B later told Witness 12 that Perhonis had kissed her (Student B), but that she was not supposed to tell anyone. Witness 12 does not know whether the contact between Student B and Perhonis continued. We have been unable to locate Student B.

3. *Witness 13 on Perhonis*

Witness 13 was at Key student in the late 1980s and early 1990s. She had several classes with Perhonis during that time period. While there she heard rumors about Perhonis, including that he previously had a sexual relationship with a student. She forced herself, however, to ignore the rumors. She did note some of his behaviors in class were odd, including on several occasions selecting a girl to model reproduction jewelry from the Walters Museum for the class. He would also frequently open a bottle of seltzer water over the desks of people sitting in the first row; she reports that she purposefully sat in the second row to avoid sitting near him. She recalls that he would at times get very angry at students and then would make a point of counting to ten to calm himself down.

Witness 13 went to college at a local school and stayed in touch with Perhonis and his wife, another Key teacher, after Witness 13 left the School. When Witness 13 graduated from college, her family invited Perhonis and his wife to have a celebratory lunch with them. After lunch, Witness 13 walked with Perhonis back to his car. At his car, he turned and kissed her on the lips. She was extremely taken aback and felt it was a violation of their prior teacher-student relationship. She felt she needed to come forward and describe this experience, even though it did not occur while she was a Key student, because it might corroborate others' experiences.

D. Paul Stoneham

In contrast to the teachers described above, Stoneham spent close to his entire career at Key, serving different functions from 1969 until 2015. During that time he taught Russian and European History, served as Head of the Upper School from 1976 to 1984, and became the School's college advisor sometime in the 1980s.

As set forth below, numerous witnesses have come forward with reports of inappropriate behavior by Stoneham at different points of time in his career. Additionally, several former students who suffered abuse at the hands of other teachers report that Stoneham was well aware of their situations and did nothing despite his leadership position. Mr. Stoneham did not respond to multiple requests for an interview.

1. *Witness 3 on Stoneham*

Witness 3's parents were divorced when she was 11 years old, at which point she, her mother, and her brother moved from Baltimore to Annapolis, and she enrolled as a student at the School. Her mother suffered from severe depression and so Witness 3 was raised primarily by her brother. Stoneham was well aware that Witness 3 was challenged by these family issues. When Witness 3 was 16, she was waiting for a ride and Stoneham offered to drive her home from school. At this point, Stoneham was a teacher and also served as Head of the Upper School. While driving her home he spoke to Witness 3 about masturbation, orgasms, her sexual orientation, and similar subjects. When they got into her neighborhood Stoneham exposed himself and then leaned over, grabbed her, and forcibly kissed her. She jumped out of the car, ran down the road, and hid by a friend's house. Stoneham evidently described the incident to Dennard as the next day Dennard told Witness 3 that she should have let Stoneham have sex with her because she was so ugly that nobody else would want to. She advised a particular teacher, John Burrowes, about parts of this experience, excluding the exposure and the forcible kissing, and recalls that he did not seem shocked by Stoneham's comments. We were unable to interview Mr. Burrowes because he is deceased.

Witness 3 was very unhappy at the School afterwards; she feels she is very fortunate, however, that Mr. Burrowes helped her get into a college theatre arts program after her junior year at Key so that she was able to leave.

2. *Student C on Stoneham*

Student C described a similar incident to the attorney who conducted an investigation in 1996. We were not able to interview Student C but reviewed contemporaneous notes from the 1996 interview she gave. Student C was a student at the School in the 1970s; her mother was a teacher at the School. Student C reported that Stoneham gave her a ride home from a seminar and that while they were in the car he kissed her and fondled her breasts. She stated that there "couldn't be any mistaking his intentions," there was "a lot of tongue" and he "crushed her breasts." From that point on she "gave him a wide berth." Stoneham had previously said that she could not be in the seminar because "she looked like one of his past lovers." She described him as "visibly agitated" and "red and sweating" when he told her this.

Stoneham was asked about this incident during the 1996 investigation. According to the notes he stated he had "no recollection of driving her home," "doesn't recall ever

kissing her," but "[would not] say that she's lying if she says so"⁸ — "if that's her recollection, that's her recollection."

3. *Student D on Stoneham*

Multiple witnesses report that it was common knowledge that Stoneham was in a relationship with a particular student in the 1970s and that Stoneham and the student eventually married. Witness 8 reports seeing them kissing at a party while Stoneham was a teacher, and the young woman was still a Key student.

That student, Student D, did not respond to our requests for an interview. She was, however, interviewed in connection with the 1996 investigation. Contemporaneous notes from that interview indicate that she asserted she was "not aware of any sexual involvement by faculty and students," and did not start seeing Stoneham on a social basis until after graduation. In the same interview she stated that Dennard was "not sexually involved with anyone at school as far as she knew" and that a particular student was "making up all kinds of strange stories."

Several former students were under the impression that Stoneham and Student D married shortly after she graduated. Court records from their divorce indicate that Stoneham and Student D married five years after she graduated and that they separated in 1990.

4. *Witness 14 on Stoneham*

Witness 14 reported an incident similar to those described by Witness 3 and Student C, but in the early 1990s. She recalls that she was in Stoneham's World History Class during her sophomore year and found the class to be very challenging and very good. She had additional contact with Stoneham during her junior year in connection with the college application process. She does not recall anything improper happening in those sessions. He helped her formulate her college essay.

During her senior year, she took Russian Studies, again, with Stoneham. This was a very small class that required a lot of work. Witness 14 felt special to be among the students allowed to take the class. In this class, Stoneham began to talk frequently about sex and made ongoing "lascivious jokes" and sexual references. Witness 14 noticed him staring at her breasts several times; she also became aware that he was standing closer to her than she found comfortable. One day during her senior year, Witness 14 was at her locker in the lower level of "the Barn." Stoneham appeared, which surprised her given that his office was not nearby. He walked up to her and rested his arm on the locker next to her, too close for comfort, and blocking her from moving away. She recalls looking toward two other teachers' offices and being dismayed that they were empty. She

⁸ The notes say, "won't say she's lying if she says so."

attempted to duck under his arm and start walking away, but he grabbed her arm as she walked toward the door. He turned her around and kissed her on the lips. She pulled away and ran out the door to the back field. He did not follow her.

Witness 14 did not tell anyone else about the incident. Her father was on the Board and her instinct was not to rock the boat.

5. *Witness 5 on Stoneham*

As noted, Witness 5 was a student at Key in the 1970s and 1980s. Stoneham was the Head of the Upper School during much of this time, and when he noticed a negative change in Witness 5's grades met with her in his office a number of times during that year. She recalls that after one particular session with Stoneham, Stoneham stood and hugged her closely and that he had an erection. *See also* Section III.A.3, *supra*.

6. *Witness 1 on Stoneham*

Witness 1 reports memories of Stoneham throwing pennies on the ground so that she and others would lean over to pick them, at which point he would "pinch our bottoms." She states that he grabbed her inappropriately several times.

7. *Witness 4 on Stoneham*

Witness 4 reports that during the summer following 7th grade, Stoneham took her to the beach at Sandy Point. She recalls that he said that he wanted to show her that he was learning to swim and remembers thinking that he still was not a very good swimmer. She said he then proposed playing a game in the water that he said he played with his wife: "I hold you," he told her, "and you try to get away." She remembers thinking that the experience was creepy, but does not remember a lot more about it.

8. *Additional Reports regarding Stoneham*

Multiple witnesses — students and faculty members — have come forward with reports of inappropriate comments made by Stoneham. Witness 15, a Key student in the 1970s, described, for example, a meeting with Stoneham after she had been on a field trip to Assateague chaperoned by Dennard and Witness 1 during which there had been nude sunbathing. She recalls him leaning forward into her face and saying, "I could just see you and [another female student] rolling around out there." She stated that he referred to another student as "a pot-smoking piece of sh*t." She said he also frequently "badmouthed" her mother, saying things like he knew her mother did not care whether she came to school.

Another student, Witness 16, from the 1970s, described Stoneham as "just horrific." She stated that he pulled her aside at one point when she was a sophomore and asked, "What are you doing with me in class? Are you winking at me?" She felt at the

time that he was flirting and wanted to get involved. He then asked her (in front of the class) whether she was winking at him and told her to, "Stop it; it makes you look stupid!" When he became Head of the Upper School she realized she needed to leave. Witness 16 left the School and enrolled at a boarding school where she was very successful.

Witness 17 recalled that in class in the 1980s, Stoneham would sit on the desks of girls and play with his chest hair while flirting. He said he imagined it was humiliating for the girls but that he was relieved Stoneham was not picking on him. He also recalls Stoneham singing the "Key School Blues" at the Holiday Assembly, which included lyrics that suggested he was "more than friendly" with some of the students.

Witness 12 stated that it was understood among female students in the 1990s that they should avoid being alone with Stoneham.

Witnesses have also reported that Stoneham harassed female faculty members. One faculty witness, Witness 18, reports that Stoneham told her repeatedly, even after she asked him to stop, that he wanted to be the father of her next child in "the natural way," and that they could have sex in his office. She said this went on for years on a weekly basis. Other faculty members confirmed that they had witnessed Stoneham flirting and making unwanted advances toward female colleagues at faculty parties.

As set forth below, we are aware that Stoneham's conduct was the subject of an internal investigation in the 1990s. There is, however, no indication of that investigation in his personnel file.⁹

9. *Stoneham's Knowledge as a School Administrator*

Multiple witnesses reported exchanges with Stoneham concerning the conduct of others and his knowledge of the conduct. Witness 9, for example, reports that she told him about Perhonis's relationship with her and that he responded, "I've got eyes." Witness 11 reports that he wrote "Have a nice Sohmer" in her yearbook.

Witness 5's mother reportedly confronted Stoneham after she learned of Dennard's and Witness 1's abuse of Witness 5 and called him multiple times. Witness 5 recalls that at one point Stoneham was upset with her after her mother had called him about discovering birth control pills in Witness 5's room. Stoneham told Witness 5 that she needed to handle situations like this in a more adult way and that she had put him in an awkward situation. It appears that in 1983 Stoneham pursued criminal charges related to Witness 5's mother's persistent telephone calls to him. In notes from a later interview of Stoneham about the situation Stoneham seemed to make no connection between what had

⁹ We understand that because Stoneham was still on the faculty as of 2013, his personnel file was not with the stored files of faculty members that were lost in the 2013 flood.

happened to Witness 5 and Witness 5's mother's persistent calls to him. Witness 5 felt very "exposed" and "vulnerable" around Stoneham, particularly concerning any issue that involved her mother.

Multiple witnesses report that Dennard, Witness 1, and Stoneham spent significant time together at "the Little Campus," a bar frequented by artists, aspiring writers, recent St. John's grads, and Key faculty and students in the 1970s. They also report seeing Stoneham at some (but not all) of the parties that included faculty and students.

A former teacher reports that when the School unexpectedly lost its physics teacher, it was Stoneham who proposed bringing back a teacher who had been let go due to a relationship with a student.

E. Vaughan Keith

Keith taught foreign languages and English at the School from 1972 to 1976. After his contract was not renewed at Key, he taught at a Connecticut school. In 1984, he began teaching at St. Alban's in Washington, D.C. Keith died in 1990.

1. *Witness 6 on Keith*

Witness 6 attended high school at Key in the 1970s. She was one of the students that Dennard encouraged to come to his apartment, where they would drink beer and smoke cigarettes. As noted above, she had multiple sexual encounters with Dennard and Witness 1. At some point while she was still a student and under the age of 18, Dennard and Witness 1 took her to a party that Key teacher Keith was hosting. During the party Keith took her to an empty apartment next door, told her she was beautiful, and had sexual intercourse with her. Keith hosted many of these parties that included a mix of teachers and students, usually around 30 people. Witness 6 and Keith "became an item." Witness 6 reported that Keith practiced bondage with her and also whipped her at times. Looking back on it she believes that Dennard "handed her off" to Keith.

Eventually a parent saw Keith and Witness 6 holding hands in downtown Annapolis and Keith was "let go." No one from the faculty, administration, or Board of the School, however, ever asked Witness 6 about what had occurred or inquired about her emotional state. Witness 6 went on to college but dropped out during her freshman year, in what she characterized as an "alcoholic" state.

Witness 6 noted that her background differs from many other students at Key as her mother did not have a lot of money. Witness 6 never told her mother about Keith's abuse of her; she reported that it "breaks her heart" to think of how hard her mother worked to gather the resources required to send Witness 6 to Key.

2. *Witness 7 on Keith*

Witness 7 went to many of the parties Keith hosted in the 1970s. She recalls that the parties included Key faculty and students and that Keith spent a lot of time standing in the closet picking records to play. Witness 7 eventually had a sexual relationship with Keith but reports that while she was still a student at the time, he was no longer a teacher at Key. She stated that she does not believe Keith harmed her. Dennard, on the other hand, she believes was "extremely predatory."

F. Charles Ramos

Charles Ramos ("Ramos") taught languages at the School from the mid to late 1990s. He did not respond to our request for an interview.

1. *Witness 19 on Ramos*

Witness 19 graduated from the School in the late 1990s. She was one of only a couple of girls in a language class Ramos taught and after a while it became obvious that he liked her. When she was studying in the library one day he came in, sat down and just started talking with her. He invited her and her friends out for drinks with him. Ramos also regularly came to dances and would attempt to spend time with Witness 19 at those events. He came to prom and asked her where she was going afterwards; Witness 19's date told Ramos that they would not tell him where they were going. She recalls walking by the old science hall at one point and seeing him standing there. Ramos grabbed her arm and wouldn't let her go until she pulled away. Witness 19 felt that Ramos's feelings for her and attempts to spend time with her were widely known among faculty members, particularly the languages staff, and yet no one did anything to intervene.

On the night Witness 19 graduated, Ramos came to her home and left a letter in her mailbox. He professed his love to her in the letter. Witness 19 was extremely upset by the contents of the letter and the fact that he knew where she lived. Witness 19's older half-sister read the letter and knew that something needed to be done. She called Ramos and told him that he should have no further contact with Witness 19 and that if he did they would call the police. Witness 19's parents brought the issue (and the letter) to Headmaster Goldblatt's attention. Mr. Goldblatt told Witness 19 it was not her fault. Ramos was allowed to resign in the late 1990s (and went on to work at another school). Both Mr. Goldblatt and another former teacher, Witness 20, confirmed that they reviewed the letter and that Ramos's contract was not renewed as a result.

G. John Sienicki

John Sienicki ("Sienicki") taught philosophy and science in the Upper School in the 1980s. One former teacher described him as a pied piper of students; he was perceived as brilliant and had a group of students that literally followed him around.

Sienicki was reportedly let go at the end of 1987 when the parents of a student complained about his relationship with their daughter. When the School unexpectedly lost its physics teacher in 1989 or 1990, however, Stoneham proposed that the School bring Sienicki back to finish the year notwithstanding the reason Sienicki was terminated in the first place. Sienicki has declined our request for an interview.

1. *Witness 21 on Sienicki*

Witness 21 graduated from Key School in the late 1980s. She was in Sienicki's physics class and was struggling. Sienicki told her that if she would sleep with him, she would get an "A." From that point on, she avoided being alone with him, but he frequently made inappropriate comments about her body.

2. *Witness 23 on Sienicki*

Witness 23 reports that when she was 17 years old (in the 1980s) she worked on the play *Midsummer Night's Dream* in different capacities. She recalls looking over and seeing Sienicki holding another student closely with his hand on her breast and the student leaning into him. She reports that she remembers this clearly. This report is consistent with a report she made in 2014 to the Anne Arundel County Police, which we reviewed in redacted form.

Witness 23 also believes that when she stopped participating in sports after school, Sienicki saw an opportunity to pull her into his world. He placed a series of late night calls to her. One of the topics in these calls was what happened at a particular church retreat; Sienicki wanted to know exactly what happened between Witness 23 and a boy who was also a Key student. (According to Witness 23, the boy attempted to kiss her, and she rebuffed his attempt.) After several calls, Sienicki told her that she had "failed his test" and that she would not be able to be in his group, which she referred to as "Life of the Mind." Witness 23 reports that, at the time, Sienicki's comments devastated her.

3. *Witness 20 on Sienicki*

A former member of the faculty, Witness 20, reports that Sienicki had a reputation for being brilliant, and that he also presented himself as a cultural icon within the School community and had a "dedicated legion" of students who followed him. Witness 20 reported that there was an incident with a particular girl¹⁰ and that her parents came in and spoke with the administration (Mr. Beach was Headmaster at the time), and that as a result Sienicki was "let go" at the end of the school year. Two years later, the School unexpectedly lost a physics teacher mid-year. According to Witness 20, Stoneham came to him and said "we need a physics teacher," and proposed that the School bring Sienicki

¹⁰ We have attempted to reach this former student, but she has not responded to our requests for an interview.

back to prepare students for the Advanced Placement examination. The witness recalled that Mr. Goldblatt, who became Headmaster after Mr. Beach, was opposed to bringing Sienicki back on campus, but that ultimately the School negotiated a short-term contract with Sienicki that required Sienicki to teach and then leave the campus immediately after class.

4. *Witness 22 on Sienicki*

Witness 22 attended the School in the 1980s. He reported that a friend of his was in an after-school science group that Sienicki led and that she told him at some point that Sienicki began taking her to his house and having sexual intercourse with her after the "group." At first she felt special; when she learned he was doing the very same thing with a friend of hers, however, she was very embarrassed and concluded that Sienicki was a predator. Witness 22 does not think she reported it to anyone but does not know. He would not identify her to us.

H. Tad Erickson

Tad Erickson ("Erickson") was not a member of the School faculty, but according to several witnesses, chaperoned multiple Key camping trips. Based on our attempts to locate him for an interview, we believe that Erickson died in 2013.

1. *Witness 24 on Erickson*

In the late 1970s and early 1980s, Key students would go on a camping trip of some sort each year in high school. When Witness 24 was 14 years old in the late 1970s, a group from the School went to Cape Hatteras. One of the adults who chaperoned the trip was Erickson. He was not a teacher, but was from the local ecological community. Witness 24 recalls "making out" with him in a tent. She does not think that the other teacher who was along, Lee Curry, was aware that this happened. Because Erickson was not a regular fixture on campus she did not see him again.

2. *Witness 22 on Erickson*

Witness 22 recalls a similar (perhaps the same) camping trip. He was 15 years old and remembers that a "counselor named Tad" was "acting out of line," rubbing a boy's chest and kissing a girl. Witness 22 believes that he told Mr. Curry about the incident shortly after the trip.¹¹

¹¹ We saw no evidence that Erickson chaperoned any further field trips. We are unable to conclude, because we lack sufficient information from which to draw a conclusion, whether Erickson was terminated by the School because of inappropriate conduct or whether his interactions with students ceased for some unrelated reason.

I. William Schreitz

William Schreitz ("Schreitz") came to the School from the Bay Country School in the early 1970s. He taught science and mathematics until the Spring of 1975. He has not responded to our request for an interview.

1. *Witness 26 on Schreitz*

Witness 26 reports that during the summer of 1975, after Schreitz stopped teaching at the School, Schreitz was one of several chaperones on a backpacking trip for Key students. Witness 26 reports that while on the trip he asked her to sleep with him "under the stars," and that for the rest of the trip he had sexual intercourse with her each evening. She reports that there was another former teacher chaperoning the trip and that he was also having sexual intercourse with a student.¹² Multiple other witnesses confirmed that Schreitz was known to have engaged in an inappropriate relationship with Witness 26 while she was a Key Student.

IV. INTERVIEWS WITH ADMINISTRATORS

A. Former Headmaster David Badger

Mr. Badger served as the Headmaster of Key School from 1972 to 1976. He was 81 years old at the time of our interview.

He described the School as a "close community" in the 1970s and pointed to the fact that in several cases parents of students were also teachers and that some of those in dual roles also lived on campus. His two children attended Key while he was there.

He reports that he was aware to a "surface degree" of parties that were taking place that included both teachers and students, but also understood that a lot of the students that were there were also the children of other teachers. He did not probe that general situation. He reported, however, that when he found out about any specific situations that he believed were inappropriate, he acted immediately. When he learned that Keith, whom he had considered brilliant and a strong teacher, was "messing with" a student, he confronted him. When Keith confirmed an ongoing sexual relationship with the student, Mr. Badger fired him.

He recalled firing other teachers for similar reasons, including a female teacher, who had a relationship with a student.¹³ When asked specifically about Sohmer, he

¹² We have spoken with this student, Witness 27, who confirms the incident. However, we have been unable to confirm that the adult involved was a former teacher.

¹³ Mr. Badger provided us with what he believed was the name of that teacher, but the name he provided was not in the faculty database nor were we able to find that teacher in any of the yearbooks.

recalled confronting Sohmer about an ongoing relationship with a student, but could not recall if he actually fired him. He later recalled that the student was the daughter of a Board member, but had no recollection of any discussion regarding the situation at the Board level.

He recalls being aware that Dennard was dating the daughter of another faculty member and noted that he understood that Dennard and the student later married.

He stated that his last year as Headmaster at Key was very difficult. Board members had raised concerns about the School's ability to attract a sufficient number of students and to develop sufficient operating funds. As a result, Mr. Badger was conducting a review of the curriculum and was focused on trying to "rebrand" the School on some level to be more attractive to more students and their families. He noted that the School was based on the St. John's curriculum and was very different from most schools. The faculty had more freedom to do what they wanted in the classroom and, as Mr. Badger described it, "some stuff worked well; some stuff did not." He described it as a "time of experimentation," and observed that "we were trying different things," in response to the general belief that public schools were on the wrong track. At some point during the year, someone from the Board let him know that several teachers had lost confidence in him. He said he began to feel isolated at that point and ultimately resigned under pressure.

When asked if he ever felt a particular group of teachers were pushing for his removal, he stated that he understood that some faculty thought he was doing well, but that others did not. He stated he wished someone had told him more of what was going on between teachers and students.

B. Barbara Vaughan, Admissions

Ms. Vaughan was 89 years old at the time of our interview. Ms. Vaughan stated that she believes that much of what occurred in the 1970s was a reflection of the culture of the times. She joined the faculty of Key in 1969 when Edward (Ted) Oviatt was the Headmaster. She said Mr. Oviatt was a great leader and was very well respected by students and faculty. Mr. Oviatt was distressed when a public school in the area expelled multiple African-American students who participated in a demonstration related to the school integration that was then occurring in public schools. Mr. Oviatt reached out to the expelled students and suggested they apply to Key; ultimately four of those students became students at the School. According to Ms. Vaughan, that decision did not go over well with some members of the Board of Trustees and at the end of the school year, Mr. Oviatt's contract was not renewed.

David Badger was hired to be the new Headmaster in 1971 and Ms. Vaughan moved over to work in admissions. Ms. Vaughan recalls that in the summer after Mr. Oviatt's departure, parent after parent withdrew their children from the School. She said

it was a difficult time in Key's history, and that Mr. Badger did not have prior experience running a school. She said that a lot of young people from St. John's were hired as faculty members at Key School. At the same time, Key was gradually expanding into the upper grades. She believes that the combination of new young and enthusiastic faculty members with the gradually increasing number of older students, and the ongoing outdoor education activities (*e.g.*, hiking and skiing trips) contributed to a lot of camaraderie and socializing among students and faculty. As someone in her forties, she viewed some of the new teachers as an extension of the student body.

At some point she concluded that Mr. Badger was not the right person to serve as Headmaster for the School and went to him and told him he should resign, which he eventually did.

She thinks there was a sort of a caste system for students and that the "chosen" ones were the students who were socializing with faculty members, and that they were having a wonderful time. She observed that as the admissions person her role was to make Key look good. She remembers taking parents on tours of campus and being proud of the debate occurring within the classrooms but dismayed at the general lack of tidiness on the campus. She recalls walking up a staircase and noticing a sandwich stuck to the ceiling. On the same tour they then walked into the library, where there was a young couple lying on the floor in the throes of pre-sexual activity. She said the librarian was present and not doing anything. She pointed to this as an illustration of the tolerant atmosphere on the campus at the time.

During her tenure, she was stationed in the "little barn" with Dennard and became close friends with him. She remembers going with Dennard into the community to raise funds for scholarships. She was his "best woman" at two different weddings, including his wedding to a former student. She was aware of Sohmer's relationships with students. She recalls in particular having Sohmer over to her house and telling him, "you're so smart; can't you find some other way to behave?" But she did not feel she had any power to do anything more about the situation. All she could say is, "I am calling you out as one of your colleagues." Looking back on it at the time of our interview she wished she had been stronger.

C. Former Headmaster Rodney Beach

Rodney Beach served as the Head of School from 1976 to June 1989, and then continued to teach at the School until 1996. He died in September 2011.

D. Former Headmaster Ronald Goldblatt

Ronald Goldblatt was the Headmaster of the School from 1989 to 1999. Previously, he practiced law, both as a prosecutor and in private practice. His children attended Key while he was there. We spoke three times to Mr. Goldblatt.

Mr. Goldblatt describes the time period as a difficult ten years and felt that when he arrived, there was confusion about the culture at the School. He felt that many people believed that being a progressive place also meant being a permissive place. He stated he worked to change that culture, which is consistent with what we have heard from teachers at the time. He had heard rumors when he arrived about Dennard and about a lot of parties at a particular house, but nothing specific. He also recalled being concerned that Stoneham, who was still on staff, had married a former student.

He recalls that the memorial service for Dennard occurred on campus in or around 1993, and believes that may have been when he first heard specifics concerning what occurred in the 1970s. He recalls that there were "cross-currents" or differing opinions about whether the School should host the memorial service, but that no one told him anything concrete. He believes now that hosting the service was a mistake. He did not go to the service but recalled coming into the office the following day and hearing what had happened — that a former student had stood up and said she was raped by Dennard. He later recalled calling the alumna and apologizing for what happened. (As noted above, Witness 5 recalls coming into his office and talking with him.)

Mr. Goldblatt recalls that Carolyn Surrick came to him in 1996 about the abuse during the 1970s and early 1980s. He said that she showed up at his office unannounced and then told him that she had been abused as a middle and upper schooler and that some of it happened in the very house in which they were talking. He remembers that Ms. Surrick said she was there for herself and for others and that she provided specifics concerning what had occurred over those years. She suggested that the School should make funds available to cover the costs of therapy for the former students. After she left, he believes he called the Board President, but he is not certain who that was at the time. He knows that Jack Gallagher was on the Board at the time, and that Gallagher's law firm, Paul Hastings, agreed to conduct an investigation for no charge. As noted, the current administration obtained a copy of that file for us.

Mr. Goldblatt recalls doing his own review of the applicable statutes concerning whether the School needed to report the allegations to any governmental entities. After Paul Hastings concluded its investigation and submitted a report to the School, Mr. Goldblatt engaged the Baltimore firm of Gallagher, Evelius, & Jones to review the School's reporting responsibilities. Around the same time, he conducted an administrative review of the School policies at issue and worked with a committee of the Board to change some of those policies.

Mr. Goldblatt also went to teachers who had been at the School during the years described by Ms. Surrick, teachers he described as his "veterans." Mr. Goldblatt said that they were "very, very careful" about what they said to him. Stoneham was not among the teachers he went to because he understood that the ongoing investigation would include him. He said he "could not get a handle on what was happening," and that "nobody filled me in." He also wondered whether "a culture of silence" had developed at the School or

whether certain faculty members had a form of "bystander syndrome." He reported being very frustrated that his "veterans" were not more forthcoming with him regarding improper behavior that had happened before he arrived.

Mr. Goldblatt recalled hiring Sienicki to come back to the School midway through the school year at some point in the late 1980s or early 1990s to replace an AP Physics teacher who Mr. Goldblatt believed was having a breakdown. He recalled initially that he did not realize when he brought Sienicki back that there were allegations that Sienicki had been let go for having an affair with a student. (Sienicki departed the first time before Mr. Goldblatt was appointed Headmaster.) Another faculty member involved with the rehiring of Sienicki (Witness 20), however, recalled and believed that the School put very tight controls on Sienicki when he came back for the temporary post, precisely because the administrators were aware of the prior incidents. When prompted with Witness 20's recollection, Mr. Goldblatt did not dispute it and stated that putting in place additional controls is consistent with something he would have considered.

He recalled firing a teacher who wrote an inappropriate, "amorous" letter to a student. He recalled that the mother of the student brought the letter to him, that he showed the letter to the teacher and asked him whether he wrote it, and that when the teacher acknowledged he had sent the letter, Mr. Goldblatt fired him. Another senior teacher at the time confirmed that this was the Ramos letter, which is also consistent with Witness 19's statement.

Mr. Goldblatt stated that he fired Perhonis, but that it was not because of any sexual improprieties; he had no idea about that until reading the August 18, 2018 article in *The Washington Post*. Rather, he said that he fired Perhonis because Perhonis was "repeatedly and abusively critical of kids." (The 1996 investigation notes mention Perhonis, but there is no indication that this information was shared with Mr. Goldblatt or with anyone else at the School at the time.)

Finally, Mr. Goldblatt recalled an incident with a teacher at one of the graduations in the early 1990s. At the time, the School had a tradition of allowing each student to select a teacher to speak for a moment about the student. The teacher spoke about a particular student in the graduating class, and Mr. Goldblatt said that during those remarks, "our eyes all locked," and that he realized that the teacher was in a relationship with the student. He went to the student's mother, to the teacher, and to the student, all of whom denied that anything was going on.¹⁴

Mr. Goldblatt noted that "there were tradeoffs being made," that highly talented teachers were on some level forgiven for transgressions. He wondered whether the same

¹⁴ The investigation notes from 1996 indicate that the School was later contacted by someone who was treating another student who had been in a relationship with the same teacher and that Mr. Goldblatt made an additional report to law enforcement.

traits that made some particular people compelling classroom teachers could also be used to make children vulnerable.

Mr. Goldblatt described the situation as heartbreaking and hopes that victims understand it was not a willful failure in the 1990s. His report to Anne Arundel authorities in early 1997 is the first time (of which we are aware) that an individual employed at the School reported suspected child sex abuse to law enforcement. Mr. Goldblatt also oversaw the implementation of improved policies and procedures at the School, including the sexual harassment policy in the mid-1990s, which was intended in part to ensure that the School's current faculty understood that sexual relationships with students were wholly unacceptable.

E. Former Head of School Marcella Yedid

Ms. Yedid was Head of School from 1999 until the end of the 2014-15 school year. She died in January 2016.

F. Head of School Matthew Nespole

Matthew Nespole became Head of School at the end of June 2015, by which point Ms. Yedid had already left the School. Mr. Nespole had limited interactions with Ms. Yedid before his appointment, but met her in connection with his initial interview in January 2015, and also at a Board retreat in March 2015. Ms. Yedid did not pass on to Mr. Nespole concerns about any faculty members past or present. Additionally, she left behind a limited set of files. As noted above, a flood destroyed the archived personnel files in 2013. The bulk of the files left for Mr. Nespole were accreditation materials and admissions statistics.

Since becoming Head of School, Mr. Nespole has retained Praesidium, a company that provides training and other services related to child abuse prevention, including a 24-hour hotline that allows callers to make anonymous reports of abuse. He arranged for Praesidium to provide a child-abuse prevention training program for all faculty and staff members in October of 2017. A follow-up training for new faculty and staff members was provided in August of 2018.

In February 2018, Mr. Nespole was contacted by Ms. Surrick, who recounted to him her prior attempts to raise the issues described in this Report with prior administrations. She told him about meeting with a Board member in 1993, about going to Headmaster Goldblatt in 1996, about cooperating with the School's investigation at that time, about reaching out to Head of School Yedid in 2003, about raising concerns regarding the School's continued employment of Stoneham with a Board Member in 2013, and her conclusion that nothing had resulted from those efforts.

Ms. Surrick explained to Mr. Nespole that the testimony of the gymnasts in the Nassar sentencing hearing had been "crushing" for her and that she began posting on social media so that other survivors of abuse at the School would know they were not alone. This was the beginning of the KeyToo group.

Mr. Nespole took the issue to Board Chair Joseph Janney, and together they determined to initiate an independent investigation of the concerns raised by Ms. Surrick and others in the KeyToo group.

G. Chair of Board Joseph Janney

Mr. Janney is the current chair of the School's Board of Trustees and has been on the Board since 2007. He agreed with Mr. Nespole that an independent investigation was the best way forward and authorized Mr. Nespole to retain a third party to conduct the investigation. He reported that he is comfortable "with letting the chips fall where they may" with respect to the current investigation.

Mr. Janney noted that when he became a Board member Ms. Yedid was Head of School. The only personnel or disciplinary issues he can recall Ms. Yedid bringing to the Board involved "adult on adult" behavior. His impression, as a general matter, is that the bar for appropriate faculty/student interactions has been raised over time, and he wants to make sure that the School handles any allegations of misconduct in an appropriate way.

H. Other Faculty Members

In the course of the investigation we interviewed six former and current faculty members who were members of the faculty during the years covered by the events described in this Report.

Several teachers observed that the culture at the School particularly in the 1970s through the 1990s allowed a closeness between teachers and students that enabled the teachers to communicate informally with students and to "be more honest" in dealing with tough questions.¹⁵ Notwithstanding that closeness, several teachers reported lacking knowledge of anything concrete that was going on between other faculty members and students. One teacher described his lack of knowledge as the result of his avoiding the rumor mill and declining to partake in the gossip. He noted, however, that he now realizes that what he saw then as "innocence" was actually "lack of information," and that, as a result, he failed in his role as a "protector."

¹⁵ All of the teachers we spoke with noted that while there may have been fewer formalities in terms of relationships between teachers and students, there was significant rigor and discipline in most classes.

Another teacher confirmed that it was easy to become "immersed" in gossip at the School. He noted, however, that on several occasions he was able to discuss with Mr. Goldblatt's administration concerns about a particular teacher's conduct and arrive at a solution. He observed, for example, that "no one wanted to be the person who took the risk of firing Stoneham," which could upset the School's college application process. He opined that this was a "Faustian bargain."

Several of the teachers we spoke with attended the 1993 memorial service for Dennard. One teacher wondered whether Witness 5's remarks at the memorial service were a wake-up call for several faculty members. Another teacher reported that it "hit [him] in the face," when *The Washington Post* article was published in August 2018, that he had done nothing — that he sat there and heard Witness 5 describe her pain at the memorial service and then he "did nothing." He said he understood then that he was part of the problem and stated that "[n]one of us adults can be excused from blame." He apologized for what he termed a "lack of courage."

Another teacher agreed that the approach to sexual abuse in the 1970s was "cavalier" and stated that "no one could claim they didn't know [about] it." Similarly, another teacher expressed with respect to a suspected relationship in the 1990s, that "in hindsight, I should have said something; I feel certain now."

Multiple veteran teachers described the evolution of the School's culture and approach to sexual misconduct over the years. One teacher observed that she thought the administration and Board were trying to move away from being a "Bohemian school" as early as the late 1970s. Another teacher confirmed that in the late 1980s, when Mr. Goldblatt became Headmaster, the approach to structure in general began to change. He thought Mr. Goldblatt was trying to build a "professional culture" where students would be treated with care. He believed that Head of School Yedid continued with that culture and described her as "tough as nails."

It appears from the interviews that as the size of the School has increased, so has the structure. One veteran teacher still at the School noted that the School is very different in many ways now — that the School is substantially larger and much more diverse, and that its financial situation is more secure. Another reported that it is clear to him that he can, and should, take issues to the Head of School, which he has done, even for incidents that occurred years ago.

V. OTHER REPORTS AND INFORMATION PROVIDED

A. Hard Drive to Anne Arundel County Police

In conjunction with the investigation, one former student, who is also the child of a former teacher (now deceased), arranged to have a hard drive picked up in Florida by the police and delivered to the Anne Arundel County Police Department. The student

believed the drive held pictures that her father had taken of boys from the School. The police department was unable to access any information on the hard drive.¹⁶

B. Minutes

The current administration provided copies of Board Meeting minutes from 1959 through the present. There are several gaps in the very early years, and, notably, a 1988 memorandum from the outgoing Director of Admissions and Advancement Marylou Symonds, which was characterized as a personal statement about the future of the School and which Board members were asked to keep confidential and consider with a grain of salt, is missing from the minutes record.

The minutes vary in detail, depending on the Board Chair and Headmaster at the time. As a general matter, it is clear that the Board's ongoing focus was on the School's finances, fundraising, and endowment, and, relatedly, its enrollment. The minutes also reveal that the Board had concerns about the School's reputation in 1970s, and that there was ongoing tension regarding the curriculum and educational environment at the School — specifically, whether the degree of freedom provided to faculty was a benefit to students or simply too much to be conducive to learning. Notably absent from the decades of minutes is concern that the School's curriculum and program, which, as noted, derives from that of St. John's College and encouraged a close relationship between students and faculty both inside and outside the classroom, came with inherent risks where those students were high school rather than college-aged. By way of example, this Report contains many accounts of sexual abuse that occurred at parties attended by both faculty and students. The 1971 Headmaster's Report, however, expresses concern that because teachers were currently overburdened and "able to do little more than teach classes[,] they were unavailable to attend dances and outside events, and Key was at risk of losing the "vitality" and "spirit" produced by such interactions.

The minutes reflect that in the mid to late 1970s the Board and administrators recognized that Key's informal culture might be problematic, but these concerns were framed primarily as worries about the negative impact the culture had on enrollment and fundraising goals. Of note, a fundraising survey conducted over the winter of 1975 by a consultant reflected concerns from parents, students, and faculty that some teachers in the Upper School had an unhealthy, guru-type relationship with students, that teachers did not set good examples for students in actions or attire, and that some surveyed commented on unprofessional relationships between faculty and students. There is no indication in the minutes that the Board or administrators interpreted such feedback as warranting further investigation or action.

¹⁶ Because we uncovered no other evidence that corroborated inappropriate conduct by this particular teacher, the teacher is not identified in the Report.

The minutes also reflect that the Board was at certain times troubled about recruitment and the very real concern that the School might need to shut down because of its overdependence on tuition. During the years when abuse was occurring Board members were advised that Board members should not air concerns about the School with friends, but rather should bring problems to the attention of the Board president, Headmaster, or appropriate Head of School. At the same time, they were reminded that speaking positively about the School in the community could do much for recruitment.

It is fairly clear that if or when serious personnel issues were presented to the Board, those discussions were not reflected or were glossed over in the minutes. That appears to have been intentional. In the spring of 1978, the period during which Dennard's teaching contract was not renewed, a Board meeting began with a Board member criticizing the minutes from the previous meeting as overly detailed and containing sensitive material. The Board member suggested that, going forward, broad issues be included in the minutes, but without specific detail. The Board voted to revise the previous meeting's minutes to omit sensitive details. Because we were not provided with the original version of the minutes in question, presumably because they do not exist, it is impossible to know if they referred to the problems with Dennard, or if the Board was concerned with removing different details, such as discussion of faculty salaries, which are mentioned in the revised minutes.

We observed three omissions that appear deliberate based on what was learned through the investigation. First, despite multiple reports that a Board member resigned because of the School's handling of Sohmer's behavior, there is nothing in the minutes about the issue. Second, despite multiple reports that the faculty, Board, and community were abuzz after a theatre teacher's intimate "tribute" to a graduating senior, the Board minutes contain no indication of any concern. To the contrary, one year later the minutes note that the teacher put the Key theatre program "on the map" and was leaving to become a professional playwright. Third, despite investigation notes that indicate in 1997 Mr. Goldblatt discussed Ms. Surrick's allegations with the Board, the minutes reflect no such discussion.

C. Other Reports

We received additional reports from witnesses that are not detailed in this report. The fact that those reports are not included does not mean that we concluded that an incident did not occur or that we found a witness to be non-credible. Rather, we have omitted reports when: (i) we have been unable to corroborate any aspect of a single witness's complaint; or (ii) when the complaint concerned the conduct of a faculty or staff member before or after they were associated with Key.

VI. THE SCHOOL'S HISTORICAL RESPONSE

Witness after witness who attended the School in the 1970s recounted that it was "common knowledge" or "well known" that teachers and students were in sexual relationships in the 1970s and early 1980s. That fact had an obvious effect on the lives of the students directly involved; it also impacted the lives of the other students in what was a small social scene. It is, accordingly, hard to understand — even given "the times" — why no one was checking with the students at the time to determine how this was affecting them.

The situation with Dennard is particularly troubling. There is little question that Dennard was a negative force on campus for a fairly large subset of Key's Upper School student body over a period of more than five years. The vast majority of witnesses from the time report that it was well known that he had an ongoing relationship with one particular student, after she survived the death of her boyfriend and stopped going to class during the fall of her junior year, and that he was partying and spending significant out-of-school time with multiple other students at this time and in the years that followed. As noted above, his partner during much of this time estimates that Dennard had sexual intercourse with approximately 25 Key students during this period. Yet, the administration and other faculty members at the time either ignored or did not notice the influence he wielded. Certainly no one intervened until his contract was not renewed in 1978.

Even in later years, it does not appear that many faculty members came to terms with the harm Dennard caused. The rationale behind asking Dennard to leave at the end of the 1977-78 school year was apparently ignored when the School agreed to host a memorial service in his honor shortly after his death in 1993 — a service that multiple faculty members attended, including Stoneham, who became Head of the Upper School just as Dennard left.

It appears that the School began to come to terms with Dennard's legacy only after a former student stood up at that service and questioned why the School was honoring a teacher who "f*ck'd" her when she was 14 years old. And even then the reaction from the adults in the community was extremely limited. The then-current Headmaster reached out to the alumna and apologized; he opined, however, that there was no institutional liability for Dennard's acts. No one else from the administration or faculty reached out to her until just recently.

In 1996, Ms. Surrick came forward to report her own experiences at the hands of Dennard and another Key teacher and to warn the School that the abuse reached many additional former students. During this period she met with six Board members, whom she described as "very sympathetic" and "sorry" and who, together with then Headmaster Goldblatt, put together a code for faculty conduct.

Ms. Surrick's report, and persistence, were significant factors leading the School to initiate an investigation in 1996. The focus of that investigation, however, was whether anything needed to be reported to the authorities and, if so, what. While interviews of some former students were conducted, no one acknowledged to any of the survivors that they had been abused by the adults charged with protecting them. Indeed, the notes indicate that there was no desire to let any of this become public at the time.

Nor does it appear that all claims were pursued. For example, although the investigation notes indicate that Perhonis's name was raised in the course of the investigation, there is no indication of any follow-up with him or his alleged victim during the investigation and no indication that his name was supplied to the administration or Board at the time — a surprising omission given that he had taught recently at the School.

As a result of that investigation, however, in early 1997, Mr. Goldblatt made a report of potential child abuse to Anne Arundel Department of Social Services concerning certain students and faculty members who were at the School in the 1970s. A few months later, he filed an additional report of suspected child abuse concerning a teacher employed at the School in the 1990s.

There was, of course, no public acknowledgement of the School's history, and, despite a request, no funds were made available to help support the intensive therapy that many survivors had undergone. And notwithstanding the explicit concerns raised about Stoneham's actions and knowledge, he was allowed to remain on campus as a member of the faculty and/or the administration for close to another 20 years.

The lack of acknowledgement and follow up by the School has had a lasting and negative effect on a number of survivors. One alumna reported reaching the end of her senior year at Key feeling "tainted," "like a failure," and "like a whore and [] damaged goods. . . ." No one intervened to correct her perception, which is consistent with a recurring theme we heard in interviews with survivors — that no one seemed to notice their distress; no teacher or administrator reached out to them to find out what was going on or whether intervention was necessary.

Many of the survivors report that notwithstanding the abuse they suffered, there were also good teachers at the School, and a stimulating environment in which academic debate flourished. Many witnesses went out of their way to describe to us Key's adaptation of the St. John's curriculum and the School's success in developing independent thinkers and strong writers. A number of the people who reached out to us initiated contact to report something they witnessed but also to express their support for former classmates or former students and their hope that the School would handle its history appropriately. These are positive aspects of the Key community.

But there is indisputable evidence that there were those in the community that took advantage of the lack of structure, the blurred boundaries between faculty and students, and what many witnesses described as a "normalization" of faculty-student relationships. There is also evidence that some in the community abused the general culture and used it to justify behavior that had a negative effect on the students in their charge.

Given the seemingly indisputable evidence that some of the abuse was common-knowledge, it is hard to understand how so many adults in the community (Key School administration and faculty and beyond) were not more proactive in addressing it. What the perpetrators did was inexcusable; it was in many instances criminal under the laws at that time. But the response of other adults in the community and at the School in particular is also cause for dismay. These were not sexual relationships between adults that went wrong; this was abuse by adults of the underage students in their charge, many times in plain view of other members of the community. Moreover, it appears that in many cases abusers targeted students dealing with family disruptions and less supervision outside of school.

Over more recent years, Key has put in place policies and safeguards to ensure that its students, faculty, and staff are protected against potentially abusive situations. By way of example, in the mid-1990s, the Board adopted a policy on sexual harassment. In 2009, it adopted a policy governing consensual relationships between adult employees after administrators learned that such a relationship was ongoing. And the current administration reports that it has already put in place several policies that it believes will prevent the problematic events of the past from recurring, including the addition of a third-party, anonymous hotline for reports of abuse and the institution of regular training in child abuse prevention for staff and faculty members.

It is no doubt easier to condemn past practices than it is to admit to fault in the present, and far easier to accuse people who are dead and gone of wrongdoing than it is to confront people we know and work with every day. Hopefully, however, the addition of the protections described in the foregoing paragraph will make it far more likely that any future abusers at Key would be identified and dealt with reasonably than was the case in the past, and far less likely that the culture of silence could ever exist again.

The majority of survivors interviewed in the course of this investigation want a public acknowledgement of what occurred, an apology from the School for allowing it to happen, and an apology for not being proactive sooner. They also want assurances that steps have been taken to keep this from happening in the future.

VII. SPECIFIC CONCLUSIONS

In summary, we conclude that:

Eric Dennard used his position as a faculty member to sexually exploit students, and the School failed to protect multiple students from Dennard, including at least Witness 1, Witness 4, Witness 5, Student A, Witness 6, and Witness 7.

Witness 1, a person with at least apparent authority at the School for a period of time, participated in at least portions of this abuse, including the exploitation of Witness 5, Student A, and Witness 6, although Witness 1's circumstances are admittedly different given Dennard's prior and ongoing abuse of her.

Richard Sohmer used his position as a faculty member to sexually exploit students, and the School failed to protect multiple students from Sohmer, including at least Witness 4, Witness 11, and Witness 9.

Peter Perhonis used his position as a faculty member to sexually exploit students, and the School failed to protect multiple students from Perhonis, including at least Witness 9 and Witness 12.

Vaughan Keith used his position as a faculty member to sexually exploit students while he was a teacher, and the School failed to protect Witness 6 from Keith.

Paul Stoneham used his position as a faculty member to have improper sexual contact with multiple students while he was a teacher, administrator, and college counselor, he harassed multiple students and faculty members at the School, and the School failed to protect multiple students from Stoneham, including at least Student C, Witness 14, and Witness 3.

Paul Stoneham knew when he was a Head of the Upper School that Dennard, Sohmer, Keith, and Perhonis had engaged in improper sexual relationships with students and chose to do nothing about it.

John Sienicki used his position as a faculty member to sexually exploit students, and the School failed to protect at least one student from Sienicki.

Charles Ramos, while a faculty member, improperly pursued a relationship with a student and, as a result, his contract was not renewed.

William Schreitz used his position as a chaperone on a Key School trip to sexually exploit a student, and the School failed to protect that student from Schreitz.

Tad Erickson used his position as a chaperone on a Key School trip to sexually exploit a student, and the School failed to protect that student from Erickson.

We conclude that in all of the scenarios described above, with the exception of the occurrences involving Tad Erickson, others in the School community including certain members of the faculty and staff, administrators, and Board members, were aware of the abuse and inappropriate conduct and chose to remain silent rather than to intervene or report the situation to the administration.

While we heard reports of other potential misconduct, as noted in Section V.C, *supra*, we could not reach a conclusion as to whether those reports were credible or not because the investigation did not uncover corroborating evidence.

* * *

This concludes our investigation. We very much appreciate the cooperation, assistance and courage of the literally scores of witnesses who came forward despite the inconvenience and, in several cases, the pain it caused them.

If anyone would like to report additional sexual misconduct, they may contact Head of School Matthew Nespole at 443-321-7800 or mnespole@keyschool.org, or the Praesidium hotline at 866.607.SAFE (7233). The hotline is available 24 hours a day, 7 days a week.