Loomis Chaffee

August 20, 2019

Dear Members of the Loomis Chaffee Community,

We write with a third update on our investigation into allegations of past sexual misconduct at the school. We began this process of reflection and accounting in May 2016 when we engaged Cowdery & Murphy, a Hartford, Connecticut-based law firm, to conduct an independent investigation. We shared summaries of the firm's initial and follow-up reports with the school community in January 2017 and September 2018, respectively. Each of these summaries elicited further allegations and information, which we turned over to our investigators, hence this summary of the most recent investigation.

The school is naming the faculty and staff below in accordance with the protocol established in 2017 for naming accused employees—the nature and extent of the allegations, the assessment of the allegations' credibility, and the response of the accused.

1. **Thomas Mack** worked at the school from 1982 to 1985 as a history and social science teacher and coach of girls basketball and soccer. During Cowdery & Murphy's initial investigation in 2016, a former student told investigators about an inappropriate advance by Mr. Mack; the incident was not reported to the school at the time it occurred. While investigating this allegation, Cowdery & Murphy reviewed school files, interviewed former administrators, and learned that Mr. Mack left Loomis following a report by another student of an inappropriate advance. This former student contacted the school following the September 2018 letter. During the course of its investigations, Cowdery & Murphy found both former students and their allegations to be credible. Attempts to interview Mr. Mack as part of this investigation were unsuccessful.

2. **William "Ted" Plamondon** worked at the school from 1969 until 2004 as an athletics trainer. Cowdery & Murphy did not receive any reports or complaints about Mr. Plamondon in response to the school's notice of investigation letter in May 2016, but did find in school files two letters of reprimand for inappropriate contact with female students in 1999 and 2003, as well as notes about a 2004 complaint from a woman attending a summer program on campus and Mr. Plamondon's letter of resignation from that same year. Following the September 2018 letter, three former students contacted the school to report that Mr. Plamondon had engaged in improper conduct with them in the late 1970s and early 1980s. Two of the three former students did not report the incidents at the time they occurred; the third former students' reports to be credible and generally consistent with the subsequent student complaints from 1999 and 2003 found in school files. Mr. Plamondon declined to be interviewed by Cowdery & Murphy.

In the cases of Mr. Mack and Mr. Plamondon, the school did not report allegations of misconduct, when it was aware of them, to the Department of Children and Families (DCF) or the Windsor Police. We have subsequently filed reports with DCF. With regard to Mr. Plamondon, records indicate that the three incidents reported from 1999 to 2004 resulted in progressive discipline that included reprimand, training, suspension, demotion, and ultimately termination. Nonetheless, the school should have been more aware of a problem and taken action more quickly given the report from the early 1980s.

In addition to the allegations noted above, the school received an additional complaint regarding **Harold Sullivan**. A non-Loomis community member reported that they were sexually abused by Mr. Sullivan at a non-Loomis summer program in the early 1980s. Investigators found this person to be credible and their account consistent with what other reporters have shared about Mr. Sullivan's conduct. Cowdery & Murphy's initial investigation uncovered multiple instances of sexual misconduct by Mr. Sullivan. Mr. Sullivan died in November 2018.

Finally, the school received second-hand reports of misconduct by a faculty member who worked at the school in the early 1960s. Investigators spoke with several former students, reviewed school records, and interviewed the former faculty member in question. One of the alleged victims in this case has since died, while the other has chosen not to come forward at this point in time. The former faculty member denied any misconduct. Cowdery & Murphy noted that the former students' "recollections were not sufficiently particular to identify the specific nature of the alleged misconduct."

The process of investigation has been challenging and upsetting, most especially for those affected by the sexual misconduct. School records have not been as complete as we would have liked, and the memories of school administrators and faculty have faded with the passage of time. Additionally, we have been mindful regarding whom to contact and with whom to follow up, fearing that we might trigger or aggravate unwanted memories if the victims

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were not yet ready themselves to come forward. We know that reporting takes great personal courage, as well as a commitment to help make a difference for current and future generations of students, and we are extremely grateful to those of you who did come forward as we attempt to reckon with this chapter in our school's history. We also applaud the exhaustive and thorough research conducted by the team at Cowdery & Murphy.

We, along with the entire Board of Trustees and the school community, apologize unreservedly to those affected. As we said last year, we know that no action that we take today will erase the deep pain caused, but we do hope that our commitment to confront all such behavior now, and in the future, may bring some healing. As we have also mentioned in previous letters, we have put a number of new policies and protocols into place to protect our students from future sexual misconduct, including rigorous reference checking and workshops for faculty, staff, and students regarding proper boundaries.

Because the decision to report misconduct is not an easy one and often takes time, this investigation remains open. If you have additional information or comments that you would like to share, please communicate directly with Sheila at 860.687.6215 or sculbert@loomis.org.

Duncan A.L. MacLean '90 Chair, Board of Trustees Sheila Culbert Head of School