

Miss Hall's School Investigative Report

August 18, 2025

This report contains sensitive and graphic
information regarding sexual misconduct.

Reader discretion is advised.



TABLE OF CONTENTS

I.	Introduction.....	3
II.	Scope of Engagement	3
III.	Independence of Investigation.....	4
IV.	Engagement of Learning Courage.....	4
V.	Methodology and Information Gathered.....	5
VI.	Overview of this Report and Evidentiary Standard Applied.....	5
VII.	Applicable Definitions and Policies.....	7
VIII.	Respecting Autonomy and Privacy Considerations of Survivors.....	7
IX.	Naming Principles.....	8
X.	Background—Miss Hall’s 2016 Community Letter Regarding Sexual Misconduct.....	10
XI.	Findings and Conclusions Regarding Reported Sexual Misconduct.....	11
XII.	Conclusion.....	60
XIII.	Appendix: Miss Hall’s School Becoming Safer and Stronger	

Miss Hall's School Investigative Report

I. INTRODUCTION

On March 27, 2024, the Miss Hall's School ("Miss Hall's," "the School," or "MHS") received a report, through legal counsel, that now former faculty member Matthew Rutledge ("Rutledge") engaged in sexual misconduct toward a Miss Hall's graduate when she was a student in the 2000s. Within two weeks, the School received additional reports of sexual misconduct by Rutledge toward several other Survivors.¹ Miss Hall's promptly engaged Aleta Law to conduct a comprehensive, neutral, and trauma-informed investigation into allegations of sexual misconduct involving any employee, including Rutledge, toward current or former students. The stated purpose of the investigation, and therefore Aleta Law's charge, was to uncover any past or present employee sexual misconduct toward students at Miss Hall's, examine what faculty and administrators may have known about employee sexual misconduct, and evaluate how the School responded to employee sexual misconduct. Through the process, Miss Hall's voiced its commitment to learning the truth about what happened and to making its community stronger and safer.

II. SCOPE OF ENGAGEMENT

In a letter to the community dated April 15, 2024, Miss Hall's invited anyone who experienced sexual misconduct by a Miss Hall's employee or anyone with pertinent information regarding sexual misconduct at Miss Hall's to contact Aleta Law.² Aleta Law was asked to investigate the reports received involving Rutledge as well as any reports of employee sexual misconduct received in response to the community letter.

Aleta Law's scope of engagement entailed: (1) investigating whether current or former Miss Hall's employees engaged in sexual misconduct with then-current Miss Hall's students; (2) examining Miss Hall's knowledge and response to sexual misconduct between Miss Hall's employees and students; and (3) assessing whether, upon learning of any information about sexual misconduct by employees, Miss Hall's acted reasonably under the circumstances.

¹ For consistency, Aleta Law used the term "Survivors" to refer to those individuals who identified as having been subject to, or were reported to have experienced, sexual misconduct. Aleta Law recognizes that individuals may not self-identify as such and/or that other terms such as "Victim" or "Complainant" may also be used. The Survivors referenced here are five alumnae who reported Rutledge's sexual misconduct, through counsel, to the School during the March-April 2024 timeframe.

² In a letter dated April 8, 2024, prior to Aleta Law's engagement, Head of School Julia Heaton invited anyone who experienced sexual misconduct at Miss Hall's or with information regarding sexual misconduct at Miss Hall's to contact her. Heaton received numerous emails, which she forwarded to the Investigators at Aleta Law at the start of Aleta Law's engagement. Aleta Law affirmatively reached out to and interviewed individuals who Investigators determined were likely to have relevant information, including those who contacted the School prior to Aleta Law's engagement.

III. INDEPENDENCE OF INVESTIGATION

Aleta Law was engaged as neutral, external investigators in this process. Neither Aleta Law nor any of its attorneys have done work for Miss Hall's in the past and agreed, as a condition of its engagement, that they will not do so in the future so as to remain impartial during the investigation.

Aleta Law received full cooperation and unfettered access from Miss Hall's to interview witnesses and review materials that Aleta Law deemed relevant to the investigation. The findings summarized in this report are based on the Investigators' independent and objective assessment of the information received during the course of the investigation, which Miss Hall's in no way constrained or influenced.

Aleta Law was not tasked with delivering a predetermined outcome. Rather, it conducted an objective and professional review of the evidence to determine, as accurately as possible, what occurred and whether Miss Hall's acted reasonably in response to known reports of sexual misconduct. Aleta Law's role was to remain neutral and forthright throughout the process, even when the findings might be difficult for Miss Hall's to receive or might reflect negatively on current or former employees. Miss Hall's demonstrated a sincere interest in understanding and confronting its handling of employee sexual misconduct and gave Investigators the autonomy and access to fully explore these issues.

IV. ENGAGEMENT OF LEARNING COURAGE

From the outset of this investigation, Miss Hall's sought to ensure that this process was trauma-informed and survivor-centered. To that end, Miss Hall's initiated an ongoing and multi-step partnership with Learning Courage, a survivor-led national nonprofit that works with schools to support sexual misconduct prevention, trauma-informed response, and healing. In addition, Learning Courage has been a resource for Survivors and community members during the investigation.

Learning Courage began a thorough audit in July 2024 of all Miss Hall's policies related to preventing and responding to sexual misconduct, and the School made some immediate changes based upon recommendations from Learning Courage. Over the summer of 2024 and continuing throughout the 2024-2025 academic year, Learning Courage provided training, worked to develop Phase 1 recommendations, and continued to work closely with School leadership through the year. Learning Courage spent three days on campus in September to conduct a comprehensive assessment of all School programs and practices that support student wellbeing. Learning Courage's Executive Director, Amy Wheeler, then presented a summary of observations, areas for improvement, and recommendations to the Board of Trustees and School Leadership on February 16, 2025.

Informed by Aleta Law's findings from the investigation, in partnership with School leaders, Learning Courage will be recommending any further improvements or corrective measures to the

School's policies and procedures, providing periodic assessments of policies, and offering on-going training to Miss Hall's employees, Board members, and students.

V. METHODOLOGY AND INFORMATION GATHERED

As noted above, Miss Hall's sent a letter to the community on April 15, 2024, inviting anyone who experienced sexual misconduct by a Miss Hall's employee or anyone with pertinent information regarding sexual misconduct at Miss Hall's to contact Aleta Law.³ Aleta Law responded to every outreach they received and offered those who contacted Investigators an opportunity to participate in an interview.

Aleta Law also sought to interview all key, relevant, current and former Miss Hall's employees. Aleta Law conducted interviews with four Heads of School and 55 current and former employees, including current and former administrators. Some of the former members of leadership, as discussed below, did not participate in interviews with the Investigators. In addition to current and former employees/administrators, Aleta Law interviewed seven current and former members of Miss Hall's Board of Trustees.

In total, Aleta Law conducted interviews with 146 participants,⁴ including interviews of students, alumnae, current and former employees, administrators, Heads of School, Trustees, and parents. Interviews included Survivors, third party reporters, witnesses, and former Miss Hall's employees accused of misconduct. Aleta Law also obtained and reviewed relevant personnel and school records to evaluate the school's response to the reported conduct. Aleta Law also reviewed Miss Hall's policies and trainings over time to evaluate the School's efforts to prevent and respond to sexual misconduct and establish appropriate boundaries between employees and students.

While Aleta Law did not reach out proactively to Survivors due to trauma-related concerns as discussed more fully below, Investigators did pursue interviews and review records that could corroborate the reported information or provide other potentially relevant information. While Investigators attempted to follow the evidence where it led to the greatest extent practicable, in some instances, the information available was limited, incomplete or unavailable. This was particularly true in circumstances where witnesses were unavailable or deceased and/or there were no school records available to fully ascertain what occurred regarding reported past events.

VI. OVERVIEW OF THIS REPORT AND EVIDENTIARY STANDARD APPLIED

The findings in this report are the culmination of Aleta Law's 15-month investigation and the information learned about the reports made to Aleta Law. This report does not purport to capture every instance of sexual misconduct that may have occurred over time at Miss Hall's, nor an exhaustive summary of all the information Investigators received in this investigation. As

³ Miss Hall's also sent periodic updates to the community and via its website.

⁴ In addition, Aleta Law conducted follow up interviews with some participants. In total, Aleta Law conducted 158 interviews.

discussed more fully below, Investigators did not proactively reach out to Survivors who were identified through third parties and were therefore unable to corroborate certain reports. Investigators were also limited, in some cases, from obtaining sufficient information to corroborate reports received because of the passage of time and/or unavailability of witnesses or evidence. In other cases, Investigators found the information reported to be outside the scope of the investigation and therefore did not include it in the report.

The report is organized in four general sections. The first section, Section XI.A, contains the reports received of substantiated sexual misconduct (as defined more fully below) by Rutledge and summarizes the School's knowledge and response in each circumstance. The second section, Section XI.B, contains the reports received of substantiated employee sexual misconduct and summarizes the School's knowledge and response in each circumstance. The third section, Section XI.C, contains the reports received of substantiated employee boundary violations. The fourth section, Section XI.D, includes reports received of sexual misconduct that were unable to be substantiated by a preponderance of the evidence because of a lack of firsthand or reliable, corroborating evidence.

A finding that the conduct was not substantiated is not a determination that the report lacked credibility. To the contrary, Aleta Law received credible, third-party reports that were unable to be substantiated because of a lack of available firsthand and/or corroborating evidence. The School and Investigators recognize that new reports and/or information may come to light following this report. In those instances where the conduct was not substantiated or information was provided by third parties, Investigators recognize that additional information may come forward, including a firsthand account from a Survivor, that may support a finding that sexual misconduct occurred. For that reason, any community member who wishes to make a report or share pertinent information regarding sexual misconduct at Miss Hall's is encouraged to contact Aleta Law.⁵

Aleta Law applied the preponderance of evidence standard in determining whether the alleged conduct at issue was substantiated. The preponderance of evidence standard is a "more likely than not" standard of proof. Investigators considered the nature, quality, and detail of the information provided as well as if the information was corroborated by third parties, or in some cases, the Respondents themselves, to determine whether reports met the preponderance standard and were therefore substantiated. In other words, if Aleta Law found the conduct at issue to be substantiated, that means that Investigators determined that the available evidence established that it more likely than not occurred. Conversely, if there was insufficient available evidence to establish that the conduct more likely than not occurred then the conduct at issue was not able to be substantiated by Investigators.

⁵ Those with new or additional information to report may contact [Aleta Law](#) Investigators, Kai McGintee and Amber Attalla, at Kmcgintee@aletalaw.com and Aattalla@aletalaw.com.

VII. APPLICABLE DEFINITIONS AND POLICIES

For the purposes of this investigation, the term “sexual misconduct” encompasses a broad range of conduct, including rape, sexual abuse or assault, any form of unwanted sexual contact or behavior, sexual harassment, and grooming or boundary-crossing behavior. Because these terms can have different legal and individual interpretations, Investigators described the specific conduct that was reported and evaluated whether the preponderance of evidence supports that sexual misconduct occurred.

To further elaborate, “grooming” may take different forms but typically involves gaining access to and isolating a minor, developing trust and secret-keeping, desensitizing touch and discussion of sexual topics, and normalizing the behaviors to avoid raising suspicion. Grooming behaviors are not only used to gain a minor’s trust, but often are used to create a trustworthy image and relationship with their family and community. In many instances, perpetrators exhibit characteristics of a trusted adult and are perceived as charming, kind, and helpful. The grooming conduct may also mimic innocent, positive, or appropriate interactions with minors, making it difficult to distinguish and recognize the conduct as harmful.⁶

In the course of this investigation, Aleta Law received reports of employees engaging in grooming or boundary crossing behaviors toward students in which the conduct was or became sexual in nature, which are included under the definition of sexual misconduct and described in Sections XI.A and XI.B. In other cases, however, the boundary-crossing conduct, though inappropriate, was not and did not become sexual in nature. Because boundary violations and grooming do not always involve or lead to sexual conduct, and the intent of the perpetrator can be hard to ascertain, Aleta Law included those reports in Section XI.C. while indicating when there was no evidence received of sexual conduct.

Finally, Aleta Law’s determination of whether sexual misconduct occurred did not depend on applicable criminal standards, such as Massachusetts law, which to date does not prohibit sexual relationships between teachers and students when over the age of consent. Given the power differential and position of trust held by employees at a boarding high school, Aleta Law considered any sexual relationship or interaction between an employee and student to be sexual misconduct and antithetical to the School’s policies and values.

VIII. RESPECTING AUTONOMY AND PRIVACY CONSIDERATIONS OF SURVIVORS

Recognizing that individuals who have experienced sexual misconduct have varied journeys and timelines with respect to disclosure and reporting, Aleta Law considered the autonomy and privacy of Survivors in the investigation process. For these reasons, and as is recognized as best practice from a trauma-informed perspective, Aleta Law did not reach out directly to individuals who were identified by third parties as Survivors of sexual misconduct. Rather, Aleta Law interviewed those Survivors who reached out to provide information about their experience and

⁶ See [Grooming: Know the Warning Signs | RAINN](#)

respected the decisions of those who chose not to come forward during this process. As noted above, to the extent that individuals who did not previously provide information during the investigation wish to do so, that avenue remains open to them after the issuance of this report by contacting Aleta Law. Aleta Law did, however, attempt to gather any corroborating information it could, including from witness interviews and school records, of reported sexual misconduct even if the Survivor did not participate in the investigation.

Aleta Law has not included Survivors' names in this report and has taken additional steps in the summary of information in this report to maintain their anonymity and privacy. These considerations informed the level of detail included in the report about Survivors' experiences. For these reasons, Aleta Law did not include the Survivors' individual and personal accounts of how they were impacted by the incidents of sexual misconduct, many of whom experienced profound and lasting effects.

Generally speaking, however, educator sexual misconduct can have serious and lasting consequences for student Survivors. The harm in these cases is often intensified by the unique dynamics of the teacher-student relationship, particularly the imbalance of power, trust, and authority. Survivors may experience emotional distress and psychological trauma, including depression, Post Traumatic Stress Disorder (PTSD), and anxiety that can endure throughout their lives. This can disrupt Survivors' social lives, academics, and careers in a myriad of ways. Survivors may experience isolation from their peers, challenges in forming and maintaining friendships and intimate partner relationships, and victim-blaming, which can lead to further emotional harm. The effects of sexual misconduct can persist well into adulthood, with Survivors often reporting ongoing mental health struggles, including substance use, low self-esteem, difficulties with romantic relationships and trust, and increased vulnerability to further abuse in the future. Survivors can also experience feelings of self-blame, shame, and guilt due to manipulation by authority figures. Particularly in the context of a boarding school, because teachers are seen as caretakers and moral authorities, the betrayal of trust can deeply intensify the trauma.

Aleta Law also omitted certain information and exact years that may help to identify Survivors to the Miss Hall's community. Aleta Law redacted and used date ranges for the same privacy reasons. For example, Aleta Law generally referred to the decade (or decade range) in which a student attended Miss Hall's (e.g. the 1990s) and an employee worked at the school (1980s-2000s). Aleta Law also redacted specific dates of events that may help to identify a Survivor. By way of example, if Aleta Law referred to the date as 201[X], that means a year in the 2010s.

IX. NAMING PRINCIPLES

In deciding whether to identify, by name, those individuals who engaged in sexual misconduct in this report,⁷ Aleta Law considered the following criteria:

⁷ Aleta Law used the term "Respondents" to refer to Miss Hall's employees who reportedly engaged in sexual, inappropriate and/or boundary crossing behavior toward students.

1. Strength of evidence received (including a credible first-hand report by a Survivor and corroboration);⁸
2. The number of reports made about any particular individual;
3. The severity of the alleged conduct;
4. Any ongoing risk to members of the community, including whether the individual was employed by Miss Hall's or another school at the time of the investigation; and
5. The effect on Survivors of naming the Respondent.

Applying the naming criteria described above, Aleta Law has identified one Respondent, Matthew Rutledge, by name.

During the investigation, five Survivors gave firsthand accounts of sexual misconduct by Rutledge. Investigators also received multiple third-party reports that Rutledge may have engaged in sexual misconduct with other former students who did not come forward. Finally, Investigators received multiple reports that Rutledge engaged in grooming and/or boundary crossing behavior toward students throughout his tenure at the School.

Aleta Law determined that there were seven additional Respondents who did not meet the criteria to be named in the report based on the available information, but who were nevertheless found to have engaged in various forms of sexual misconduct toward former students. Aleta Law also did not identify by name the four Respondents who were found to have engaged in boundary violations where there was no evidence of sexual conduct, or those Respondents whose conduct was not substantiated.⁹

The fact that a Respondent did not meet the naming criteria at this time does not foreclose the possibility that a Respondent could be named in the future; facts may be learned after the issuance of this report that supports naming a Respondent at a later time. Most importantly, regardless of whether the naming criteria was met, Aleta Law found the sexual misconduct that the Respondents engaged in, as summarized in detail below, to be wholly inappropriate, harmful, and unacceptable behavior by school employees toward students entrusted in their care.

In terms of naming involved school personnel, Aleta Law identified the Head of School at the time of the reported conduct when relevant. Aleta Law identified former Heads of School Richard McLain ("McLain") (1967-1969), Bob Bussey ("Bussey") (1976-1984), Trudy Hall ("Hall") (1992-1996), Jeannie Norris ("Norris") (1996-2012), Peggy Jablonski ("Jablonski") (2012-2013), and Mary Grant ("Grant") (2013-2014), and current Head of School Julia Heaton ("Heaton") (2014-present). In addition, Aleta Law identified one longtime administrator, Jenny Chandler

⁸ The lack of a firsthand account from a Survivor, and the potential effect of identifying a Survivor who did not come forward, was therefore a consideration under the naming criteria.

⁹ While the report against him was unable to be substantiated, one Respondent in this category, Richard McLain, was identified by name due to his position as Head of School.

(“Chandler”) (1989-2012)¹⁰ and the Board of Trustees Chair, Nancy Ault (“Ault”) (2019-present).¹¹ Identifying the Heads of School, this particular administrator, and the Board Chair by name underscores their responsibility in overseeing the institution’s culture, policies, and responses to misconduct. This transparency holds leaders accountable, informs the community about the measures taken to protect students, and assists in understanding systemic failures and implementing reforms.

Aleta Law did not otherwise identify individuals by name in this report but instead referred to involved persons by role (i.e. “employee,” “student,” “alumna”). Aleta Law nevertheless evaluated School officials’ knowledge and response to the sexual misconduct described in this report. Aleta Law also identified and detailed in this report the circumstances in which the Investigators found that Miss Hall’s failed to appropriately address known sexual misconduct. The purpose of describing these institutional failures is to understand past harm and prevent recurrence in the future.

X. BACKGROUND—MISS HALL’S 2016 COMMUNITY LETTER REGARDING SEXUAL MISCONDUCT

By way of background, in 2016, Miss Hall’s School invited any community members with information about sexual misconduct at the School to come forward and established a protocol for responding to reports. Specifically, in the spring of 2016, The Boston Globe published an article reporting on findings of the newspaper’s investigation into sexual misconduct at independent schools in New England. Though the article did not refer to Miss Hall’s School, as Head of School, Heaton sent a message out to the Miss Hall’s community, reiterating that the issue is “critically important” to Miss Hall’s and encouraging any community member with concerns to contact Heaton directly.

At the time, Miss Hall’s Board of Trustees established a protocol for addressing reports of sexual misconduct by former students or other third parties. Activating the protocol, Miss Hall’s Board of Trustees created a subcommittee to receive and respond to any information about sexual misconduct that arose from Heaton’s 2016 community letter or at any other time in the future. Aleta Law interviewed some of the members of the Board of Trustees who handled responses to the 2016 community letter and reviewed the information provided to Heaton and the Trustees at the time.

Two alumna who responded to the 2016 community letter also shared their accounts of employee sexual misconduct, grooming and/or boundary crossing behavior to Aleta Law and are included in this report. None of the information received by Miss Hall’s in 2016 related to sexual misconduct by Rutledge, or any student or employee present during Heaton’s leadership.

¹⁰ Chandler was Miss Hall’s Dean of Students from 1989-1994, Assistant Head of School from 1994-2009, and Dean of Academics and Faculty from 2009-2012.

¹¹ Ault has served intermittently on Miss Hall’s Board since the 2000s and became the Board Chair in 2019.

XI. FINDINGS AND CONCLUSIONS REGARDING REPORTED SEXUAL MISCONDUCT

Aleta Law received and reviewed reports about employee sexual misconduct at Miss Hall's that spanned from the 1940s through the 2010s. Specifically, Aleta Law was able to substantiate reports of sexual misconduct involving eight different Respondents that spanned from the 1940s to the 2010s. None of the substantiated reports of sexual misconduct involve any of Miss Hall's current employees.

With respect to Rutledge, Aleta Law was able to substantiate, based on a preponderance of the evidence, all five of the Survivors' firsthand accounts of Rutledge's sexual misconduct toward them as students and/or recently graduated alumnae from the 1990s until 2010. The conduct found to have occurred included grooming behavior, sexual advances, sexual touching, and forcible oral and vaginal intercourse as well as other forms of sexual conduct. Aleta Law also heard from numerous other alumnae who provided firsthand and third-party accounts of Rutledge's boundary transgressions and favoritism toward them and other students that spanned his career at the School up to his departure in 2024.

A. Substantiated Reports of Sexual Misconduct Involving Matthew Rutledge

Rutledge was a faculty member at Miss Hall's from 1991 to 2024. During his tenure, Rutledge held various roles, including teacher, coach, resident, advisor, and department chair. Survivors, alumnae and current and former employees at Miss Hall's spoke to Rutledge's prominent presence on campus, describing him as a "god" or "king" at Miss Hall's with a "larger than life," charismatic personality. Aleta Law heard from numerous community members over Rutledge's tenure that recalled Rutledge cutting the cafeteria lines and "bounding" through hallways, saying "make way for Mr. Wonderful." Several individuals described Rutledge's close relationships with leadership, including Norris and Chandler. This, according to some alumnae, gave Rutledge "power" and, in their opinions, allowed his behavior to go "unchecked." While some alumnae and current and former faculty described Rutledge as "opinionated," "narcissistic," and "cocky," others described him as a father figure, friendly, funny, and a revered teacher at the school. Rutledge was characterized as a "polarizing" figure on campus, "you either loved him or you hated him." Numerous alumnae and current and former employees shared that students and parents alike adored Rutledge.

Rutledge's counsel did not respond to the Investigators' attempts to seek Rutledge's participation in the investigation. Thus, Rutledge was not interviewed by the Investigators, and Aleta Law relied on the information provided by the Survivors, witnesses, and/or other corroborating evidence, including school records, to reach these findings.

a. Accounts from the 1990s

i. Student 1

Aleta Law received a firsthand account from a student in the 1990s, Student 1, who described unwanted physical contact from Rutledge beginning when she was a freshman student. Student 1 stated that Rutledge “constantly” hugged her in front of others, explaining that she could feel Rutledge’s “penis against [her]” during the hugs. Student 1 stated that during her sophomore or junior year, Rutledge “encouraged” her to get rides into Pittsfield in his personal car. Student 1 stated that during the car rides, when she was 15 or 16 years old, Rutledge would fasten her seatbelt for her by leaning over her and “caress[ing]” her breasts. Student 1 stated that Rutledge would also comment on her appearance, telling her that she looked “pretty” while in the car together. Student 1 stated that Rutledge instructed her not to tell “anybody” about the car rides, but that she eventually went to then-Head of School Hall because Student 1 thought she would get in trouble for riding in Rutledge’s car. Student 1 stated that she told Hall that she had been getting car rides from Rutledge and that the car rides made her “uncomfortable.” Student 1 stated that she did not disclose to Hall that Rutledge touched her breasts. Student 1 stated that Hall did not inquire as to why Student 1 was “uncomfortable” in the car with Rutledge, nor did she tell Student 1 to stop riding in the car with Rutledge. Student 1 stated that she stopped getting car rides from Rutledge after she told Hall about them.

Around the same time as her car rides with Rutledge, Student 1 stated that Rutledge asked her to come to the Miss Hall’s basement where he would “try to engage in sexual activity” with her on several occasions. Student 1 stated that Rutledge did not actually kiss her but would get “very close.” Student 1 stated that Rutledge also touched the outside of her pants on her vaginal area and attempted to “open [her] pants.” Student 1 stated that she “push[ed] away” from Rutledge during these encounters to express that his advances were unwanted and he eventually stopped. Student 1 stated that she did not report Rutledge’s conduct in the basement to any employee at Miss Hall’s.

ii. Student 2

Rutledge was Student 2’s teacher and coach while she was a student at Miss Hall’s. Student 2 stated that Rutledge “befriended” her and encouraged her to share “personal details” about her life and sexual history, such as asking her if she knew how to “keep a boyfriend” and what she had done sexually in the past. Student 2 stated that beginning her freshman year, Rutledge would give her “long” hugs and press his body against her when he saw her around campus or when he would enter her dorm room for check-ins. Student 2 stated that Rutledge initiated a “private study time” with her, when the two would read aloud to one another.

Student 2 stated that Rutledge became “more physical” with her throughout her freshman year and would begin to massage her shoulders and stroke her hair, saying she “looked stressed” or “needed to relax.” Student 2 stated that during these massages Rutledge eventually worked his way down to touching her breasts, asking “Has anyone touched you here?” Student 2 stated that

on one occasion, another teacher, who is now deceased, walked in and saw Rutledge's hand down her shirt and "turned around and left."

Student 2 stated that beginning her sophomore year, Rutledge engaged in additional sexual contact with her during bus rides, including placing her hand on his erect penis and touching her thighs and buttocks. Student 2 stated that during Parents Weekend her sophomore year, Rutledge approached her in the Miss Hall's basement common area while she was watching a movie and sat on the couch next to her. Student 2 stated that Rutledge insinuated that her parents did not care about her and stated that he was "always here for her." Student 2 stated that Rutledge rubbed her feet and legs and then proceeded to "have sex" with her for the first time, at which time she was 16 years old. Student 2 stated that the next day, she experienced pain and there was blood in her underwear, so she went to the school nurse.¹² Student 2 stated that she "alluded to the fact" that she had had sex with an adult who worked at the school, and the nurse "shut [her] down immediately" by saying something to the effect of "We don't say words like that." Student 2 stated that the nurse sent her back to her dorm with pads and no one from the School followed up with her.

Student 2 stated that Rutledge had sex with her on one more occasion during her sophomore year, which she said took place in the "chalet" on campus after she went for a morning run with Rutledge. Student 2 stated that Rutledge continued to engage in other sexual contact and intercourse with her on multiple additional occasions during her junior and senior year at Miss Hall's, including at his house when she was babysitting his children, in his classroom, and in other rooms/locations on campus. On one occasion her junior year, Student 2 stated that Rutledge tried to "teach her" to give oral sex by telling her that she needed to know how to do it for boys to "keep them around," but she refused. Student 2 stated that on another occasion her junior year, when Rutledge was engaging in sexual activity with her in a room next to the Miss Hall's kitchen, a nearby security guard¹³ "heard a noise" and asked whether everything was okay. Student 2 stated that she did not believe the security guard saw anything and the security guard did not investigate further because Rutledge responded that everything was "fine." Student 2 stated that during athletic games and practices Rutledge would also tape her leg injury and use it as an opportunity to "brush" against and touch her genitals.

Student 2 stated that Rutledge brought her "mementos" throughout her four years at Miss Hall's, including a bracelet, a ring, and mix tapes with "The Doors" songs. Student 2 stated that Rutledge would meet her at the mall and have her try on clothing that he would buy for her and "encourage [Student 2] to wear them for him."

Student 2 stated that she did not report Rutledge's conduct to any employee at Miss Hall's apart from alluding to the school nurse her sophomore year that she had sex with an adult on campus. Student 2 stated that she was afraid of getting in trouble or expelled from Miss Hall's. Student 2 stated that Rutledge made her believe that she would get kicked out of school, not get into

¹² Student 2 was unable to recall the identity/name of this school nurse.

¹³ Student 2 was unable to recall the identity/name of this security guard.

college, and that he would commit suicide if she reported his conduct. Student 2 stated that she did not tell anyone about her experience with Rutledge until 2024 when the allegations about Rutledge were made public and she spoke with the lawyer representing several of the Survivors.

Aleta Law reviewed Student 2's student file from Miss Hall's, but did not locate any documents, including medical or nurse records, related to Rutledge's reported conduct.

As stated above, the teacher who Student 2 said walked in and saw Rutledge's hand down her shirt is now deceased. Therefore, the Investigators were unable to obtain that teacher's perspective about this reported interaction. In addition, Student 2 and the Investigators were unable to identify the school nurse¹⁴ or security guard who may have had information about the events Student 2 described.

iii. Rutledge's Boundary Crossing Conduct Toward Other Students in the 1990s

Aleta Law also received other credible firsthand and third-party accounts from students in the 1990s describing behavior on Rutledge's part that transgressed boundaries of a normal student-teacher relationship. For example, former students shared that Rutledge made them mix tapes, wrote them poems, spent time alone with them and called them by nicknames. One former student shared that while other faculty members would conduct nightly dorm check-ins by peering into a student's room from the hallway, Rutledge came into her dorm room to talk with the door closed. Another alumna disclosed that Rutledge called her alone into his classroom, handed her a dictionary and instructed her to look up the definition "best" in the dictionary. When she did so, she found that Rutledge had cut out a photo of her and pasted it next to the word "best" in the dictionary.

Several alumnae shared that Rutledge paid particular attention to his "favorite" students, which included a group of international students. One alumna stated that Rutledge was "constantly flirting" with these international students. As noted below, alumnae identified two international students with whom Rutledge was rumored to have had inappropriate and/or sexual relationships.

iv. Third-Party Reports that Rutledge Had Inappropriate/Sexual Relationships with Other Students in the 1990s-early 2000s

Aleta Law received third-party information from alumnae that Rutledge may have had inappropriate or sexual relationships with several other students from the 1990s and/or into the early 2000s, including Student 3, Student 4, Student 5, and Student 6.

¹⁴ The head school nurse from this timeframe is deceased. No other school nurses or employees interviewed reported having any knowledge of Student 2's disclosure.

Several alumnae stated that they heard rumors about Rutledge's relationship with an international student, Student 3. Multiple alumnae stated that Rutledge spent a lot of time with Student 3 and rumors circulated about the inappropriate nature of their relationship. One alumna stated that she would hear "all the time" that Rutledge and Student 3 were in a sexual relationship.

Two alumnae stated that Rutledge was "always very friendly with the [international] group of students" and paid particular attention to Student 4. These alumnae stated that Rutledge was "always around" Student 4. One of the alumnae stated that on one occasion while babysitting for Rutledge's children with Student 4, Rutledge came home and sat down next to Student 4, placing his arm around her back.

One alumna stated that she walked into an advisee session with Rutledge and felt an "energy that was super awkward" between Rutledge and Student 5. Another alumna stated that Student 5 was a "favorite" of Rutledge.

An alumna stated that she heard "rumors" that Student 6 might have had an "inappropriate relationship" with Rutledge. Another alumna stated that she heard rumors that Rutledge and Student 6 had a "special relationship," were "close" and she had a feeling that it was "maybe a little creepy and a little weird."

Aleta Law was unable to substantiate these third-party reports but recognizes that individuals may come forward or provide information in the future that leads to the substantiation of additional sexual misconduct by Rutledge.

b. Accounts from the 2000s

i. Student 7

Student 7 stated that she had Rutledge as a dorm parent, advisor, cross-country coach, and history teacher while she attended Miss Hall's. Student 7 stated that beginning her freshman year, when she was 14 years old, Rutledge would linger in her dorm doorway during nightly check ins, sit on her bed talking to her, and give her "long, lingering hugs." Student 7 stated that toward the end of her freshman year, she contemplated leaving Miss Hall's, but Rutledge encouraged her to remain at the school and told her that he would serve as her advisor.

Student 7 stated that Rutledge began serving as her advisor and cross-country coach her sophomore year. Student 7 stated that Rutledge would regularly ask her to meet with him alone in his classroom, where he would sit next to Student 7 and "drape" her legs over him while Student 7 did her homework. Student 7 stated that Rutledge would hug her, and she could feel his "erect penis" against her body. Student 7 stated that Rutledge would ask Student 7 to use the "Carmex lip balm" that he kept in his pocket, and while she used it, Rutledge would watch Student 7 put the lip balm on her lips. Student 7 stated that during her junior year, Rutledge began to put the Carmex lip balm on Student 7's lips himself.

Student 7 stated that during cross-country practices, Rutledge brushed up against her shoulders while they ran together. Student 7 stated that Rutledge also encouraged her to sit next to him in the front seat of the Miss Hall's van. Student 7 stated that while riding in the van, Rutledge pressed his leg against her leg, and "rubbed" her upper thigh area. Student 7 stated that while doing so, she noticed a "growing bulge" in Rutledge's pants/shorts, which she now understands was an erection. Student 7 stated that Rutledge would "massage" her legs in the athletic center before or after cross country practices. Student 7 stated that when cross-country season ended, Rutledge asked her to go on runs alone with him, where he would "brush his hands up and down" Student 7's back and "graze" Student 7's breasts. During this time period, Student 7 stated that Rutledge singled her out, shared "intimate" details about his personal life, referred to Student 7 as his "good friend," and encouraged her to open up about her own life. Student 7 stated that she was 15 years old during her sophomore year when these interactions started.

During her junior year, Rutledge was Student 7's history teacher, cross-country coach, and advisor. Student 7 stated that Rutledge regularly commented on her appearance, praised her, and gave her numerous gifts.

Student 7 stated that during her junior and senior year, Rutledge "openly massaged" her "upper thigh" with his hands in front of her cross-country teammates. Student 7 explained that Rutledge would massage her inner thigh area over and under her shorts and in her vaginal area and "graze and touch" Student 7's breasts. Student 7 stated that during her runs alone with Rutledge, he would "constantly" place his hands on her breasts and other parts of her body. Student 7 stated that Rutledge's touching of her legs and intimate body parts occurred daily in the school van, Rutledge's personal car, the athletic center, cross country meets, hallways at Miss Hall's, Rutledge's classroom, and outside on campus. Student 7 stated that Rutledge touched her legs, vaginal area, and breasts "daily" during their one-on-one cross country runs and at various locations on Miss Hall's campus. Student 7 stated that before going home her junior year, Rutledge kissed her in the hallway outside her dorm room where anyone could see. Student 7 stated that Rutledge would also kiss her and walk into the Main Building at Miss Hall's with his arm around her. Student 7 stated that she was 16 and 17 years old at the time of these interactions.

Student 7 stated that Rutledge increasingly sought her out during her senior year, asked her to send him "seductive" photos of herself, and talked with her on the phone for hours. Student 7 stated that Rutledge wrote her love letters and poems, which he said reflected their "true and deep friendship." Student 7 stated that he wrote things like, "Thinking about your heart-shaped face cupped in my hand," and "When I think about you, I feel like a drowning man." Student 7 stated that Rutledge gave her books, such as *Lolita*, and music, such as *Don't Stand So Close to Me*, by the Police, with themes of love and inappropriate relationships between adults and children. Student 7 stated that Rutledge would call her nicknames, such as "Little One" and "Pearl." Student 7 stated that Rutledge asked her explicitly about sex and her sexual experiences and would share details about his sex life. Student 7 stated that Rutledge spent "even more time" "lingering" during dorm check-ins, where he would comment on Student 7's body.

Student 7 stated that during the spring of her senior year, when she was 18 years old, Rutledge drove her off campus in his car and parked in a “deserted area.” Student 7 stated that Rutledge asked Student 7 to sit on his lap. Student 7 stated that Rutledge then “made out” with her, “rubbed” his erect penis on her inner thigh, and told her she “made him so hard” and it was “difficult for him to hold himself back.” Student 7 stated that Rutledge asked her to touch his penis and then put his fingers inside of Student 7’s vagina. Student 7 stated that she did not consent to any of the sexual contact that occurred.

Student 7 stated that on graduation day, Rutledge “pulled” Student 7 away from the receiving line and told her that he wanted to speak in “private.” Student 7 explained that Rutledge took her into his classroom, gave her a letter and gift, hugged her for a long time, gave her a “goodbye kiss,” and told her that he “loved” her. Student 7 stated that he then walked her back outside to the graduation. Student 7 stated that she began to cry and shared with some classmates that Rutledge had kissed her and told her that he loved her. Student 7 stated that she later learned that a student reported Rutledge’s conduct to Employee 3.

Student 7 stated that Rutledge “loved” saying and writing “inappropriate things” in public forums, and his excessive praise of Student 7 extended to his comments in her school records and the Miss Hall’s yearbook. In these records, Rutledge referred to his “friendship” with Student 7 and their runs together. In her report cards, Rutledge wrote that Student 7 “has been the complete package,” “I can’t say it enough, and yet, I feel as if I’ve been saying it all along, Student 7 is simply outstanding.” In another report card comment her senior year, Rutledge wrote that Student 7 is “irreplaceable” to him. Rutledge wrote further, “I will miss my runs with Student 7, especially, but in many other ways she has shown me real kindness, and that’s something I will not soon forget.”

Student 7 stated that after graduation, Rutledge engaged in “forceful” and “animalistic” vaginal and oral sexual intercourse with her in various places, including his campus home. Student 7 stated that while she stayed at Rutledge’s house, she would wake up to Rutledge having sex with her. Student 7 stated that Rutledge gave her the children’s book “Where the Wild Things Are,” and asked Student 7 to lay naked on his chest while he read the book to her. Student 7 stated that when Rutledge finished the book, he would have sex with her. Student 7 stated that Rutledge visited her in college and would bring her “girlish lingerie, pink dresses, and stuffed animals.” Student 7 stated that Rutledge told her to “dress up” and would have sex with her while her stuffed animals were still in her bed. Student 7 stated that Rutledge would film her while they had sex at a nearby motel. Student 7 stated that Rutledge told her she was his “sex slave” and that Rutledge could “do whatever he wanted to do” with her.

Student 7 stated that after the sexual contact with Rutledge ceased, Rutledge continued to “manipulate and control” her for years to come. As an example, Student 7 stated that when she graduated from law school, Rutledge sent her the live stream recording of all of the parts of the graduation ceremony that focused on Student 7 and said, “I’m still watching you and proud of you.” Student 7 stated further that Rutledge would tell her that he “enjoyed watching” Student 7 “grow up” and that he was Student 7’s “protector for life.”

Student 7 stated that in June 2023, she heard that an alumna told Heaton at class reunion that Rutledge should not still be teaching because he had inappropriate relationships with students in the past. Student 7 stated that she contacted Rutledge and told him what the alumna said to Heaton. Student 7 stated that Rutledge told Student 7 that she was the “only student” that Rutledge had a “romantic and sexual relationship” with at Miss Hall’s, and that he was “grateful” for Student 7’s “protection.” Student 7 explained that Rutledge had a lot of control over her “because of the grooming” that started when she was 15 years old, and even as an adult, she would “do anything” Rutledge told her to do.

On the morning of March 29, 2024, after receiving notice from Heaton that sexual misconduct allegations were made against him, Rutledge texted Student 7, writing that he “assumed” that the allegations related to Student 7. Rutledge wrote further:

I am mortified and deeply sorry to think you might have to deal with this [...] I am not sure how to conduct myself here, other than knowing that I can only offer a blanket denial and decline the opportunity to say more than that to anyone who asks to speak to me about this [...] I don't regret my decisions in terms of my feelings for you [...] If you would like me to step down, I will do so—but I hate that [...].

Student 7 stated that after receiving the text message from Rutledge, she called him and informed him that she did not report him to Miss Hall’s, and did not believe that the allegations were about her. Student 7 stated that she asked Rutledge if he knew who the allegations were about and Rutledge replied, “No, it would only be about you, this could only be about you.”

Student 7 stated that shortly after her call with Rutledge, she received an email from Student 9’s attorney. Student 7 stated that after receiving the email from Student 9’s attorney, she called Rutledge again and asked who Student 9 was. Rutledge stated that Rutledge then told her, “The jig is up, I had sex with Student 9 while she was a student” and “clearly I have a flaw and I’m going to resign.” Student 7 stated that after her phone call with Rutledge, she spoke with Student 9 on the phone, and they shared their respective experiences with one another.

Following the phone call with Student 9, on March 30, 2024, Student 7 called Rutledge again. During the phone conversation, Rutledge admitted to behaving “immorally” and “terribly” and having a “sexual” and/or “romantic” relationship with both Student 7 and Student 9. In this conversation, Rutledge further acknowledged that he “deceived” people that he loved and respected. Rutledge also told Student 7 that he made himself believe that the “things [he] did” for Student 9 and Student 7 “were good.”

Investigators interviewed a number of alumnae who corroborated Student 7’s account of Rutledge’s sexual misconduct. Student 7’s friends stated that Student 7 told them when they were students that Rutledge engaged in sexual contact with Student 7, including kissing her and digitally penetrating her vagina. One alumna stated further that Rutledge asked Student 7 to send him “sexual, nude photos,” which the alumna said she took for Student 7 in Student 7’s dorm

room to send to Rutledge when Student 7 was 16 or 17 years old. Friends of Student 7 additionally stated that they learned from Student 7 that Rutledge had “kissed” Student 7 and told her he “loved her” at graduation. One friend of Student 7 recalled that Student 7 “disappeared” during graduation, came back “looking really shaken,” and said that Rutledge had “taken off his wedding ring and professed his love to her.”

One alumna stated that she remained close with Student 7 after graduation and learned that Student 7 and Rutledge were still in contact. The alumna stated that Rutledge wrote Student 7 poetry and would get “really mad and possessive” if Student 7 had another relationship. The alumna stated that a year or two after Student 7’s graduation, Student 7 told her she was “visiting” Rutledge at a hotel.

Student 7’s friends and other alumnae also shared observations of Rutledge’s public interactions with Student 7 at Miss Hall’s that transgressed boundaries of an appropriate student-teacher relationship. These individuals observed Rutledge and Student 7 spending time alone together outside of class, going for runs together, and having physical contact, such as Rutledge placing his hands on Student 7’s shoulders or giving Student 7 lengthy hugs. Numerous other alumnae from various class years stated that they heard “rumors” and “assumed” that Rutledge had a sexual and/or romantic relationship with Student 7 but did not have any direct knowledge of it.

ii. Student 8

Student 8 stated that Rutledge was her history teacher and cross-country coach during her sophomore year. Student 8 stated that she and Rutledge became “close,” and she viewed Rutledge as a “mentor.” Student 8 stated that Rutledge was “complimentary” about looks and clothes and made remarks such as, “Oh, you look nice, you’re pretty.” Student 8 stated that Rutledge took her on one-on-one driving lessons, during which time he placed his hand on her neck or leg in the car. Student 8 stated that she and Rutledge also went on one-on-one cross country runs together off campus, where Rutledge would disclose details about his sex life and question Student 8 about her dating relationships.

Student 8 stated that during cross-country practice, Rutledge crossed boundaries with her and her teammates by putting his arm around girls, hugging students for a “long time” and “resting his hands” on girls’ necks during team “huddles.” Student 8 stated that Rutledge “always” gave her a hug at the beginning and end of runs. Student 8 explained that the hugs were “lengthy.” Student 8 stated that Rutledge’s hugs and neck touching would take place in front of adults, including Student 8’s parents.

Student 8 stated that Rutledge’s conduct toward her was often in public view. Student 8 stated that on one occasion, Employee 1, observed Student 8 and Rutledge “in the corner, in the back of the room having a private conversation.” Student 8 stated that she was wearing a “strapless dress,” and Rutledge had his hand on her bare shoulder. Student 8 stated that Employee 1 pulled her aside and asked if everything was okay, to which Student 8 replied “Yes.” Student 8 stated that Employee 1 told her something to the effect of, “[Rutledge] is your teacher, not your friend.”

Student 8 further stated that she and Rutledge exchanged private, personal messages with one another over email. Student 8 stated that there was an “over familiarity” in Rutledge’s messages to her. In one of the emails, Rutledge referred to Student 8 as “my fast little friend.” In another email, Rutledge praises and compliments Student 8 and refers to their personal relationship, writing,

[...] First off, it’s a pleasure to know you, to coach you, to run with you, to teach you, to talk with you [...] you’re easy to talk to, you are earnest, you have a subtle, clever, (deceptively wicked) sense of humor, and you always mean well. But you’re introspective, too, and a little reticent sometimes. I think this makes it harder for people to really get to know you [...]. The first half of the year has revealed more and more of who you are to me, but we have things [] in common, and we’ve taken time to get to know each other, and you’re clearly the type of person that time reveals more of [...].

Student 8 stated that Rutledge wrote a poem in the yearbook about the cross-country team and described Student 8 as the “cross country queen,” writing, “if [the running] program’s a crown, then Student 8 is a jewel.” Student 8 stated that Rutledge also wrote in the yearbook: “The season is over, our endurance was tested. We ran city streets, and thank God weren’t molested.” Student 8 stated that Rutledge made his conduct seem “normal” even though it was “intrusive.”

Student 8 stated that after leaving Miss Hall’s, Rutledge stayed in “close contact” with her, including continuing to go for one-on-one runs and on one occasion running to Rutledge’s mother’s house to swim in her pool. Student 8 stated that she also messaged with Rutledge via AOL Instant Messenger “pretty frequently,” at least once a week. Student 8 and her parents stated that Rutledge “ingratiated himself into her family” and her parents “trusted him,” noting that Rutledge came to their family home with his daughter for dinner.

Student 8 stated that during her freshman year at college, Rutledge was in the area and reached out to “get together.” Student 8 stated that she and Rutledge spent the day together around her college town and had dinner together at a restaurant, where Rutledge ordered her alcohol. Student 8 stated that it “felt like [she and Rutledge] were on a date.” Student 8 stated that both she and Rutledge were “tipsy” after dinner.

Student 8 stated that they walked to Rutledge’s car in a parking garage and before getting into the car, Rutledge told Student 8 about “what a nice day he had” and asked if he could kiss Student 8. Student 8 stated that she was “extremely uncomfortable, [she] froze immediately, and didn’t know what to say.” Student 8 stated that she told Rutledge “No,” but she “felt bad,” so she told him that he could “have a hug.” Student 8 stated that she and Rutledge then had a “very uncomfortable hug.”

Student 8 stated that during the car ride back to her campus, Rutledge asked her whether she was going to tell her parents about the night. Student 8 stated that when she returned to her dorm room, she told her roommate about Rutledge’s actions and her roommate “immediately

recognized this for what it was and encouraged [Student 8] to tell [her] parents.” Student 8 stated that later that night Rutledge messaged her again asking her not to tell her parents. Student 8 stated that she is “very close” with her parents and told them what happened with Rutledge.

Student 8 stated that after she told her parents, her father reached out to Rutledge, and Rutledge agreed to meet Student 8’s father at a restaurant. Student 8’s father, who was interviewed as part of the investigation, stated that when he met with Rutledge, Rutledge “seemed very contrite and knew he did something bad.” Student 8’s father stated that Rutledge “tried to explain that he was in love with [Student 8],” which Student 8’s father told Rutledge was “inappropriate.” Student 8’s father stated that he told Rutledge to stay away from his daughter.

iii. Student 9

Student 9 began attending Miss Hall’s sophomore year, when Rutledge was her history teacher and fitness coach. Student 9 stated that when she first arrived at Miss Hall’s, older students “warned” her about Rutledge and told her that Rutledge previously had a “romantic and sexual relationship” with Student 7.

Student 9 stated that Rutledge paid “close attention” to Student 9 inside and outside of the classroom, providing her extra help with her studies and encouraging her to spend time alone with him outside of class. Student 9 stated that sometimes while Rutledge taught or during morning meetings, he would “stare” at Student 9, “freeze,” and say he lost his train of thought. Student 9 stated that she thought this was Rutledge’s way of trying to make her feel “special.” Student 9 stated that sometimes Rutledge would sit with her in the dining room and “peel oranges” with her; Student 9 stated that she thought this was Rutledge’s way of having “more alone time” with her.

Student 9 stated that she also took “fitness” with Rutledge as the coach. Student 9 explained that in fitness, it would often be just the two of them alone in a room doing one of Rutledge’s old workout videos, *Gilad*. Student 9 stated that the entire time she worked out with Rutledge, his eyes were on her, not the TV.

Student 9 stated that Rutledge gave her additional “special” attention by giving her gifts and commenting on her appearance (both in front of other students and alone). Student 9 stated that Rutledge gave her gifts, such as a stuffed animal, and food items, including, “Swedish fish, mints from Canada, almonds, cheese, dried cherries, [and] Pepsi.” Student 9 stated that Rutledge would feed her these snacks in his classroom. Student 9 stated that Rutledge would tell her she was his “type” and compare her to “Penelope Cruz and Salma Hayek.” Student 9 stated that Rutledge made her “mix tapes” featuring the songs: “All I Want is You,” “You’re The One That I Want,” “Love Shack,” and “Sex Laws.”

Student 9 stated that Rutledge also encouraged her to join his chaperoned weekend trips. Student 9 stated that during the trips, Rutledge would ask her to sit next to him in the school van, where he would press his leg against hers and “touch” her thighs. Student 9 stated that Rutledge

engaged in other physical contact with her in his classroom by “drap[ing]” her legs over his and “graz[ing]” her breasts. Student 9 described long hugs with Rutledge, stating that she could feel his “erection” during the hugs. Student 9 stated that Rutledge shared “very intimate” details about his personal life and encouraged her to disclose details about her sexual history and her “secrets.” Student 9 stated that Rutledge gave her nicknames, such as: “Little One, Little Girl, Miel,¹⁵ [and] Piglet.” Student 9 stated that Rutledge “professed his love” for her and created a “secret code” to express his feelings for her in cards and letters that he gave her.

Student 9 stated that toward the end of her sophomore year, she considered leaving Miss Hall’s, and Rutledge encouraged Student 9 to stay enrolled. Student 9 stated that Rutledge came to visit her family home that summer when she was 16 years old. Student 9 stated that during the trip, she and Rutledge took long walks alone together, during which Rutledge held her hand, “pressed” his body “tightly” against her and touched her body, including her breasts and buttocks. Student 9 stated that during dinner with her family, Rutledge “massaged” her upper thigh under the dinner table. Student 9 stated that during the trip, Rutledge read her the book *Pooh and Friends* and told her to put her head on his shoulder while he read. Student 9 stated that while he read to her, she saw that Rutledge had an “erection.”

Rutledge became Student 9’s advisor beginning her junior year. Student 9 explained that at Miss Hall’s, advisors were like “parents” and determined whether students could leave campus. Student 9 stated that she and Rutledge spent a lot of time one-on-one on and off campus.

Student 9 stated that she became close friends with Rutledge’s daughter and Rutledge “encouraged” the friendship to gain “more access” to Student 9. Student 9 stated that on an outing with Rutledge and his daughter her junior year, Rutledge pulled Student 9 toward him and “kissed” her on the lips while they were sitting right behind Rutledge’s daughter. Student 9 explained that Rutledge “liked to take those kinds of risks.”

Student 9 stated that later that year, when she was still 16 years old, Rutledge instructed her to come to his classroom “very early” one morning wearing her pajamas. Student 9 stated that Rutledge met her at the door, “pulled [her] inside,” and closed the door. Student 9 stated that Rutledge told her to lie down under the classroom table, took her pants off, and performed oral sex on her without her consent.

Student 9 stated that Rutledge instructed her to come to his classroom in the early morning on a second occasion later in her junior year when she was 17 years old. Student 9 stated that Rutledge led her to his closet, where there was a yoga mat already on the ground laid out. Student 9 stated that Rutledge “guided” her down to the mat, removed both of their clothing, and “got on top of” Student 9, “forcefully” inserting his penis into her vagina and ejaculating inside of her. Student 9 stated that Rutledge “took [her] virginity without [her] consent.” Student 9 stated that Rutledge did not wear a condom and when he ejaculated inside of her, she told Rutledge she “was not on birth control,” and Rutledge told her not to worry “because he had a vasectomy.” Student 9 stated

¹⁵ Miel translates to “Honey” in French.

that when she returned to her dorm room after the encounter, she Googled, “What is a vasectomy?”

Student 9 stated that a month later, Rutledge and his daughter visited Student 9 at her family home. Student 9 stated that Rutledge stayed in her family’s guest cottage while visiting. Student 9 stated that “early one morning” while his daughter was still asleep, Rutledge instructed Student 9 to come to the cottage, and when she did, Rutledge “pulled [her] inside” and “locked the door.” Student 9 stated that Rutledge took her to the bed where he instructed her to perform oral sex on him, which she did. Student 9 stated that Rutledge then engaged in nonconsensual vaginal intercourse with her, which Student 9 described as “forceful and animalistic.”

Student 9 stated that during her junior year, Rutledge continued to “grope” and “have inappropriate sexual conversations” with her. Student 9 stated that Rutledge gave her a “claddagh ring” and “insist[ed]” Student 9 put the heart facing “in” to show she was “taken.” Student 9 stated that Rutledge would make her use his “very worn-out tub of Carmex” lip balm and sometimes Rutledge would put the Carmex on Student 9 himself.

Student 9 stated that Rutledge suggested that they communicate through “AOL Instant Messenger.” Student 9 stated that Rutledge “walk[ed] [her] through how to clear the cache on [her] computer” and “delete everything” after each time they spoke online. Student 9 stated that toward the end of her junior year, Rutledge also communicated with her via phone. Student 9 stated that Rutledge had Student 9 check her mom’s phone bills to “make sure” Rutledge’s number didn’t appear and if it did, he instructed Student 9 to “take the bill.”

Student 9 stated that while she was 17 and 18 years old, Rutledge provided her alcohol to drink. Student 9 stated that Rutledge would drink Evan Williams whiskey and have Student 9 drink it from his mouth. Student 9 stated that Rutledge would tell her to close her eyes and “pretend [she] was in the woods and drinking woods” when she drank the whiskey so she would not vomit.

Student 9 stated that Rutledge continued to “sexually exploit” her throughout her senior year at Miss Hall’s. Student 9 stated that Rutledge would “insist” on picking her up from the bus station after School break, wherein he would “kiss and touch” her and Student 9 would “perform oral sex on him at his request.” Student 9 stated that Rutledge asked her to wear lingerie during his nightly dorm check-in and “encouraged” her to send him revealing photos. Student 9 stated that Rutledge encouraged Student 9 and Rutledge’s daughter to have sleepovers at Rutledge’s home. Student 9 stated that during one of the sleepovers, Rutledge entered the bedroom while she was “half asleep,” and “forcibly penetrated [her] with his penis until he ejaculated inside of [her].” Student 9 stated that during her time at Miss Hall’s, Rutledge had sexual intercourse with her without her consent approximately ten times, including in his classroom, school-owned home and at Student 9’s family home.

Student 9 provided photos of notes from Rutledge throughout her time at Miss Hall’s, including an inscription in her yearbook. In the notes, Rutledge refers to Student 9 by terms of endearment and nicknames, praises her, expresses his admiration for her, and refers to their “friendship.” In

one yearbook inscription, Rutledge addresses Student 9 as “Little [Student 9],” and tells her that it has been a “pleasure” teaching her while referencing their personal interactions, such as “peeling oranges” and “laughing a lot” together. Rutledge added,

I admire your family very much and I appreciate your kindness. You’re a lucky girl to have people who love you as they do, and I’m sure we’ll see each other again [...]. Your many friends and fans here hope you will come back here, and none more than I. You’re not done growing at MHS yet.

Student 9 stated that at graduation, Rutledge presented her with a letter, which reads, in part:

You’ve taught me a lot about how a person can achieve their dreams, and I place no small value on our friendship. I know that we will keep in touch, and that’s something that makes it a little easier for me to accept your commencement, your new beginning. I can’t wait to see and know how much you will mean to the world. You have a firm place in our hearts, and [my daughter] and I will be there for you—count on it. You have my respect, my affection, and my utmost admiration!!! !! Moo.”

Student 9 stated that the “!!! !!” at the end of the letter was a code that Rutledge and Student 9 had created for “I love you, so much.”

Student 9 stated that she did not report Rutledge’s conduct to any employee at Miss Hall’s. Student 9 explained that beginning her junior year, Rutledge “threatened [her] often that he would kill himself” if Student 9 told anyone of his behavior toward her.

Student 9 stated that after she graduated from Miss Hall’s, Rutledge continued to “sexually exploit” her. Student 9 stated that Rutledge gifted her cases of wine when she was underage and encouraged her to drink before his visits. Student 9 stated that Rutledge continued to have unprotected sex with her after she graduated from Miss Hall’s, including at his school-owned home, in his car, at a motel, and in Student 9’s college dorm room. While at the motel, Student 9 stated that Rutledge filmed her “performing oral sex on him.”

Investigators interviewed a number of alumnae who corroborated Student 9’s account of Rutledge’s inappropriate behavior with Student 9. Numerous alumnae stated that they observed Rutledge and Student 9 spending time alone together and in close physical proximity to one another at various locations on Miss Hall’s campus. Two alumnae stated that they observed Rutledge and Student 9 sitting alone together in Rutledge’s classroom with Student 9’s legs “laying over his legs.” Another alumna stated that she observed Rutledge and Student 9 playing a “lotion fingers game” in which Rutledge would put a dollop of lotion on each fingertip and Student 9 would press down on Rutledge’s fingers to see how long it took for the fingers to slip. Other alumnae stated that they observed other physical contact between Rutledge and Student 9, including hand holding or Rutledge placing his hand on the “small of [Student 9’s] back” or on her “shoulder.” A friend of Student 9’s stated that Student 9 and Rutledge would talk to each other

over instant message and text “all the time.” Student 9’s friend stated that on one occasion, Student 9 told her that she was going to the gym because Rutledge said he “wants to see what [Student 9’s] boobs look like when [she’s] running on a treadmill.”

Student 9’s school records reflect that in her term reports, Rutledge repeatedly praised Student 9, commented on their extra help sessions, and referred to Student 9 as his “buddy.”

iv. Rutledge’s Boundary Crossing and Sexualized Behavior Toward Other Students in the 2000s

Aleta Law received other credible firsthand and third-party accounts from students in the 2000s that Rutledge engaged in inappropriate, boundary crossing and sexualized behavior toward them and other students.

Student 10 described Rutledge as a “father figure,” stating that she engaged in “a lot” of one-on-one time with Rutledge. Student 10, who was on Rutledge’s cross-country team, stated that Rutledge engaged in inappropriate physical and verbal conduct toward her throughout her time at Miss Hall’s. Student 10 stated that Rutledge would “stretch” her privately in the athletic center by putting his head between her legs and near her “crotch,” at times pressing his penis and body against hers. Student 10 stated that Rutledge would “kiss” her on the forehead and place his hand on her thigh. Student 10 stated that on one occasion during a cross-country run with a group of students, Rutledge huddled the girls together in a circle with their heads down, and Student 10 noticed that Rutledge’s erect penis was sticking out of his running shorts. Student 10 stated that Rutledge also made inappropriate sexual comments and jokes to her. By way of example, Student 10 recalled one occasion when she went to see the movie “8 Mile” with Rutledge, his wife, and the cross-country team. Student 10 stated that Rutledge was sitting next to Student 10, had his hand on Student 10’s thigh, and leaned over to ask if Student 10 understood the scene in the movie when a female character “wet her hand” before performing a “hand job.” Student 10 stated that Rutledge told her that the female character had to “wet her hand” to “get him off.” Student 10 stated that “since that day,” including years after Student 10 graduated, Rutledge would always say to Student 10, “Are you keeping your hands wet [Student 10]?” as their “little joke.”

Student 11 shared that Rutledge would take her for car rides and listen to music together. Student 11 stated that when she was 15 or 16 years old, she disclosed to Rutledge that she was having a sexual relationship with an adult man older than Rutledge who she was interning for at the time. Student 11 stated that Rutledge brushed it off, telling her, “As long as you’re safe and happy.”

Multiple other alumnae stated that Rutledge was “flirtatious” toward them and other students, singled them out, made them feel “special,” called them by nicknames, talked about personal topics, and engaged in physical behavior that included “shoulder bumping” in the hallways and touching girls’ backs and arms.

A mother of one alumna stated that during her daughter’s freshman year, the mother was waiting outside of Rutledge’s classroom to speak with him and overheard Rutledge talking with two freshman girls in an “actively flirting” manner. The mother stated that it was “not the kind of

conversation a teacher has with their students.” The mother stated that she later approached Rutledge and made it clear to him to stay away from her daughter. The mother explained that Rutledge had been giving special attention to her daughter, and she believed this confrontation stopped Rutledge’s behavior from escalating with her daughter.

c. Accounts from the 2010s

Aleta Law did not receive any accounts of sexual misconduct by Rutledge toward a student after 2010.¹⁶ Miss Hall’s employees stated that Rutledge maintained close relationships with students, but that they did not observe any specific concerning or inappropriate behavior apart from a “tag” game that Rutledge would play with students during this time period. One employee who observed the game stated that Rutledge and students would “sneak up” to one other in the hallway and “tap” each other on the shoulder or back.

d. Accounts from the 2020s

The Investigators received five reports of boundary-crossing behavior by Rutledge in the 2020s. None of the reported conduct involved sexual contact or behavior by Rutledge. Rather, after the Survivors’ reports about Rutledge’s sexual misconduct were made public in the spring of 2024, several students reported concerns that Rutledge had engaged in boundary-crossing behavior and been grooming them.

For example, Student 12 reported to a Miss Hall’s employee that Rutledge asked a group of students whether they got changed together for sports in the locker room. Student 13 and Student 14 reported to a Miss Hall’s employee that Rutledge invited them to his house to study, spent time alone with them, and discussed his marriage. Student 15 reported to a Miss Hall’s employee that Rutledge called her by a nickname, encouraged her to take his class, and commented on her roommate’s absence during a nightly check-in, which made the student feel “off.”

In addition to these documented reports made to Miss Hall’s employees after his resignation, Aleta Law received one firsthand account from a current student, Student 16, who reported experiencing conduct that in hindsight, following the public reporting about Rutledge’s sexual misconduct, seemed “weird.” Student 16 stated that Rutledge would “single [her] out” in class, “tease” her and “make up nicknames” for her. Student 16 stated that Rutledge was her “favorite” teacher and she felt like one of Rutledge’s “favorite” students. Student 16 stated that while she did not think anything of the conduct at the time, “if somebody [her] own age” had engaged in similar behavior, she would think that he was “flirting.”

¹⁶ However, Rutledge’s sexual misconduct and/or abuse toward Student 7 and Student 9 continued after they graduated from Miss Hall’s and past 2010.

e. School's Knowledge and Response to Sexual Misconduct Involving Rutledge

The subsections (i-v) below detail the School's knowledge of, and response to, known sexual misconduct involving Rutledge, organized by the tenure of each Head of School during Rutledge's employment at Miss Hall's.

i. Miss Hall's Knowledge and Response under Trudy Hall's Leadership (1992-1996)

As explained above, Student 1 stated that she reported getting car rides with Rutledge to Head of School at the time, Trudy Hall. Student 1 stated that in the disclosure, she did not specify that sexual or physical contact occurred, but she did tell Hall that the car rides made her "uncomfortable." Student 1 stated that she did not otherwise report Rutledge's sexual misconduct to any employee of the school.

Hall stated that she did not recall a discussion with Student 1 about car rides with Rutledge, nor did she receive any reports of sexual misconduct involving Rutledge during her tenure. Aleta Law requested and received personnel and student records, none of which referenced any report of misconduct related to Student 1 and Rutledge.

Based on the information available, there was insufficient evidence to conclude that Miss Hall's had contemporaneous notice of Rutledge's sexual misconduct toward Student 1. Accordingly, the evidence is insufficient to support the finding that Hall had any knowledge or received any reports of sexual misconduct involving Rutledge while she served as Head of School at Miss Hall's.

ii. Miss Hall's Knowledge and Response under Jeannie Norris's Leadership (1996-2012)

A considerable portion of the information provided during Aleta Law's investigation related to events that occurred during the leadership of Norris as Head of School and Chandler as an administrator.¹⁷ Norris was advised by her counsel not to submit to an interview with the Investigators but provided information to Investigators through her counsel. Chandler, through her counsel, declined to participate in an interview with the Investigators. Without the opportunity to interview Norris and Chandler, these findings are primarily based on the firsthand accounts of Survivors, third party witnesses, and other school employees as well as school and other records from the time periods in question.

199[X] Discipline of Student 17

Several former students and employees shared that Miss Hall's leadership became aware of the rumors circulating about Rutledge's sexual misconduct in 199[X], when a senior student, Student

¹⁷ As detailed above, Chandler held the roles of Dean of Students, Assistant Head of School, and Dean of Academics and Faculty during her tenure at Miss Hall's.

17, told a group of her peers at a senior meeting that Rutledge was “fucking” or “having sex” with international students, and/or more specifically, Student 3.¹⁸

School records indicate that in the spring of 199[X], Miss Hall’s suspended Student 17 for the remainder of the school year, did not permit her to attend graduation, and required her to write an “apology” letter to Rutledge as a result of making this remark. A letter from then-Head of School Norris to the student’s family stated that the remark was “defamatory” and “cast aspersions on the professionalism and moral conduct” of Rutledge. An update from Norris to the Board of Trustees at the time appears to reference the disciplinary matter of Student 17, and states that the alumna showed “no contrition or remorse” for her statement. The records do not indicate whether Norris or other Miss Hall’s employees investigated the veracity of Student 17’s statement about Rutledge.

Two alumnae who sat on the disciplinary committee stated that the view at the time was that Student 17 was “lying,” and it was “never really even considered” that Rutledge could be having an inappropriate relationship with a student. Following the disciplinary decision, an all-school meeting was called, and students were instructed “not to gossip” about the situation or there would be “disciplinary action.” An employee at the time stated that Norris’s speech during the meeting centered on “rumor and slander and the detriments that can cause” in an employee’s life.

Employee 2, an alumna from this time period, stated that when she came to work at Miss Hall’s, she asked her new colleagues about the situation and was told it was “just a rumor” that was investigated and found to be untrue.

June 200[X] Report from Employee 1 Regarding Student 8 and Other Students

The evidence also supports that in June 200[X], Norris and Chandler received a report from Employee 1 regarding Rutledge’s “worrisome” behavior toward then-Student 8.

Employee 1 stated, and school records confirmed, that she reported concerns about Rutledge’s interactions with students, and in particular, Student 8, in June 200[X] to Head of School Norris. Specifically, Employee 1 reported seeing Rutledge at a Miss Hall’s event with his hand on the “bare shoulder” of Student 8. When Employee 1 approached Student 8 at the event to ask whether she was okay, Student 8 told her she and Rutledge were “very good friends” and she was not uncomfortable.

At the time of Employee 1’s report to Norris in June 200[X], Employee 1 also reported additional behaviors by Rutledge that Employee 1 had observed over the years. Specifically, Employee 1 reported seeing Rutledge in “too close” physical proximity with Student 8 as well as other students, using a common “lip balm” with volleyball players he coached, and commenting that a

¹⁸ Aleta Law did not receive firsthand or reliable corroborative evidence to substantiate that Rutledge engaged in sexual misconduct toward Student 3.

student who was wearing shorts has a “great pair of legs.” Employee 1 noted that Rutledge’s behaviors occurred in public places, which suggested to her that he was “unaware of his behaviors.” Employee 1 also noted that it appeared to her that he “needs too much attention from the girls.”

According to school records, Norris and Chandler met with Rutledge the day after Employee 1’s report, and advised Rutledge that he was creating “negative perceptions” about himself and his behavior with a student. Norris also instructed him to cease all contact with Student 8, including going for runs with Student 8 or emailing her for any reason. Further, Norris informed Rutledge that he needed to be aware of any behavior that “could remotely be misinterpreted” and that the school would conduct a sexual harassment training for all staff.

Norris’s counsel told Investigators that the report from Employee 1 was the first time that Norris had heard any concerns about Rutledge’s interactions with students.

Disclosures to Employees Regarding Student 7

Student 7 stated that while she did not report Rutledge’s sexual misconduct to any employee at Miss Hall’s, two of her classmates reported the inappropriate relationship between Student 7 and Rutledge to two Miss Hall’s employees, Employee 3 and Respondent 8,¹⁹ on separate occasions during her senior year. Student 7 stated that despite these reports, no one from Miss Hall’s ever questioned her about the relationship.

Student 7’s classmate, Student 18, stated that during the fall of 200[X] (Student 7’s senior year), she walked into Rutledge’s classroom and saw Student 7 sitting on Rutledge’s lap with Rutledge’s hand under Student 7’s shirt touching her breast. Student 18 stated that she confronted Rutledge, who yelled at her and “threatened” Student 18’s and Student 7’s college admissions and “futures.” Student 18 stated that she left Rutledge’s office crying and ran into Respondent 8 on the way out. Student 18 stated that Respondent 8 asked her what was wrong, and Student 18 responded that she had “walked in on” Student 7 and Rutledge and referred to their “creepy” relationship. Student 18 stated that Respondent 8 dismissed Student 18, telling her, “Go to your room.” Student 18 stated that she was never questioned by anyone at Miss Hall’s about what she observed between Rutledge and Student 7.

Respondent 8 denied that she received a report by any student or employee at Miss Hall’s involving inappropriate behavior by Rutledge toward Student 7 or any other student. Respondent 8 further stated that she never observed or heard about any inappropriate behavior by Rutledge toward Student 7 while Student 7 was a student. Respondent 8 stated that after Student 7 graduated, she heard a “rumor” that Rutledge and Student 7 had “kissed” on a cross-country run. Respondent 8 stated that she believed she heard this information from Employee 3, discussed below, and did not report the information because Respondent 8 believed it had already been reported to Chandler or Norris.

¹⁹ Respondent 8 was an employee at Miss Hall’s but also a Respondent, as described in Section XI.C.a of the report.

Employee 3 stated that shortly after Student 7's graduation, Employee 3's advisee shared that Student 7 told the advisee that Rutledge "kissed" Student 7 on a cross-country run and told Student 7 he "loved" her at graduation. Employee 3 stated that she reported the information to Chandler, who Employee 3 said "seemed to take it seriously." Employee 3 stated that Chandler later followed up to tell Employee 3 that Student 7 "made this up" and that Student 7 just had a "crush" on Rutledge.

School records indicate that Employee 3's report to Chandler occurred approximately a month after Employee 1's report to Norris regarding Student 8. Following Employee 3's report, Rutledge prepared a memo to Chandler regarding the "rumors" about Rutledge and Student 7 that were reported by Employee 3. In the memo, Rutledge denied kissing Student 7 or otherwise having an "inappropriate student-teacher relationship" with her. Rutledge acknowledged going on runs alone with her, telling her he loved her, and giving her personal graduation gifts consisting of his Nike hat, which Student 7 had "always admired," and a copy of *Benet's Reader's Encyclopedia* with a personal letter glued to the inside cover. Rutledge wrote that telling Student 7 he loved her was "not a romantic expression," and that he did not "regret saying it, as it happens to be true" but that he regretted that it "has been repeated and misconstrued." Rutledge also wrote that he gave Student 7 the gifts because she was his advisee, a student with whom he had "been very close" and she and her family had shown him "real kindness." Finally, Rutledge wrote in his memo that, per Chandler's instructions, he spoke with Student 7's mother to relay this information, that someone from the school might contact her, and that Student 7's mother was "not concerned" about his relationship with Student 7.

School records do not indicate whether Miss Hall's investigated the interactions and relationship between Rutledge and Student 7 beyond what was shared by Rutledge. Student 7 stated that no one from the School ever contacted her or her parents to question her about this report.

Though Norris was not interviewed, Norris's current legal counsel stated that Norris learned through Chandler that Rutledge had "self-report[ed]" to Chandler that Rutledge had been "running in town" with recently graduated student, Student 7. Norris's counsel told Investigators that Norris sought legal advice from the school's now deceased, former legal counsel at the time ("Attorney 1"), and Attorney 1's advice was a directive that Rutledge not run alone with students. Records from Attorney 1,²⁰ which were obtained during this investigation, indicate that Norris sought legal advice from Attorney 1 about Rutledge's interactions with Student 7 and the explanation Rutledge gave about them. In response, Attorney 1 noted that Rutledge "seems to be acting in a mature way. Given his [account] he seems responsible- a kind gesture" and Attorney 1 agreed that counseling for Rutledge should be encouraged.

²⁰ Attorney 1, who died in 2015, kept these notes to/from Norris seeking legal advice along with Rutledge's memorandum to Chandler in his law firm files.

200[X] Report by Student 8's Parents

The evidence supports that approximately two and a half years later, Norris received a report from Student 8's parents that Rutledge attempted to kiss and professed his love for Student 8, who was in college at the time. Student 8's parents wrote a letter to Norris in February 200[X], informing her that Rutledge engaged in "unmistakably inappropriate" behavior with their daughter during his visit with her in her college town. They wrote that while Student 8 was "not physically harmed," she was "very upset." The letter continues:

While we do not feel vindictive, we do feel it is our responsibility towards the Miss Hall's community not to remain silent about this [...] [a]s we must deal with the consequences of this breach of trust, we know that you will want to take the necessary steps to protect other young women and their families from this experience.

Following receipt of the letter, Norris met with Student 8's parents to discuss the events described in the letter. Student 8's parents stated that when they met with Norris, they shared the specific details of Rutledge's advance toward Student 8, including that he asked to kiss her, as well as Rutledge's admission that he was "in love" with Student 8. Student 8's parents stated that Norris told them that she would "deal with the situation."

Norris's current counsel told Investigators that after meeting with Student 8's parents, Norris once again sought advice from Attorney 1 to determine an appropriate course of action. Attorney 1's contemporaneous records support this. In the records, Norris asked Attorney 1 for legal advice as to (1) whether the School should retain Rutledge, noting there is "nothing illegal about [his] behavior" because Student 8 is "now of age"; (2) the level of risk to the School if Rutledge was retained; (3) the risk if the School terminated Rutledge; (4) whether the documented "pattern of lapses in judgment" by Rutledge would "increase the School's liability if we retain and something happens with a current student"; and (5) the School's response to Student 8's parents.

Attorney 1's records support that Norris consulted with Attorney 1 on the course of action reflected in Norris's letter to Rutledge below. Norris's notes reflect that Norris and Attorney 1 discussed that there "were not grounds for dismissal."

Rutledge's personnel file documents reflect that following the meeting with Student 8's parents, Norris and Chandler met with Rutledge and instructed him to refrain from contacting Student 8 and engaging in inappropriate behavior with students or alumnae, which they noted was a "pattern" for Rutledge, specifically referring to Student 7. A letter from Norris to Rutledge set out the expectations for Rutledge moving forward. The letter to Rutledge reads:

We are meeting today to address the incidents that have been reported to me involving your seeing [Student 8] while [in the regional] area on a professional development trip.

This incident has the potential for seriously damaging the School and your reputation. By crossing this boundary line, you have harmed the School and your professional reputation. We can assume that there will be talk and that, therefore, the reputation of the School has been weakened. (Regrettably, MHS has a negative legacy of inappropriate behavior between students and teachers. Wherever that lingers, this will serve to strengthen it.)

There is also the risk that news of what happened will filter back to the current student body and to your peer group. That can, and most likely will, cause students and parents to doubt the most precious commodity we have-the trust between students and teachers. We live in a highly sensitized culture. This isn't the 70s or the 80s. Society has no stomach for any kind of inappropriate behavior between adults and girls or teachers and students.

In meeting with [Student 8's parents], I heard clearly that they see your actions as breaching the trust between teacher and student. I was also made to understand that they do not want you to contact their daughter again and that this is also what [Student 8] wants.

My expectations for you are as follows:

1. Any further contact with this young woman will seriously make me wonder if you are someone I can trust to work with our students.
2. Any inappropriate behavior with a current student will result in your immediate termination.
3. You have created negative perceptions in the past about this young woman. You also created negative perceptions with another former student. There can be no more behaviors (with this alumna, any other young alumna, or any current student) that would raise worries from colleagues or anyone else.
4. I am requiring you to seek professional help in order to deal with this issue.
5. I am also requiring you to check in with [the school counselor] once every two weeks in order to have someone with whom to share the thoughts and feelings you are having.
6. I am asking [Chandler] to let you know quickly and directly if she observes any behavior from you that is worrisome to her.

If at any time you believe that you are at risk for not being able to follow through on these expectations, I will expect you to schedule an appointment with me so we can agree on how to move forward.

Norris's current counsel told Investigators that Norris subsequently called Student 8's parents to report what had been done to address the matter with Rutledge. School records confirmed that Norris followed up with Student 8's parents to inform them that Norris spoke with Rutledge, expressed serious concerns about his behavior, set expectations that he was not to have contact with Student 8, and told Rutledge he was required to seek professional help within the School and with outside resources.

Other Miss Hall's Employees' Knowledge of Rutledge's Inappropriate Conduct²¹

Student 7 and Student 9 stated that several employees observed interactions that should have alerted them to the inappropriate nature of their relationship with Rutledge.

Student 7

Student 7 stated that it was common knowledge that Rutledge and Student 7 shared a close relationship and spent time alone together on and off Miss Hall's campus, which her dorm parents (Employee 4 and Employee 5) would have specifically known about.

Employee 4 confirmed that Student 7 and Student 9 were "favorites" of Rutledge, and that Rutledge took them off campus alone "all the time." Employee 4 stated that she used to try to time her own runs to coincide with Rutledge's cross-country practice to see if she could observe any inappropriate behavior by Rutledge, but never did. Employee 4 stated that while she speculated Rutledge may have engaged in "inappropriate kissing" with Student 7 and Student 9 when they were students, she never thought he was having sexual relationships with them. Employee 4 said that Rutledge was a "favorite" of Chandler, and she believed Chandler would have "shunned" her for reporting concerns about Rutledge without "concrete evidence," which is why she never did.

Employee 5 denied having any knowledge of Rutledge's inappropriate conduct toward Student 7. Employee 5 stated that while Rutledge "definitely" had "favorites" and spent time in his classroom at night with students, that was a "normal" thing for teachers to do at the time.

In addition, Student 7 stated that Miss Hall's faculty members noticed Rutledge taking her alone off campus and questioned her "often" about her interactions with Rutledge. Specifically, Student 7 stated that Employee 6 may have been a faculty member who asked her about the relationship

²¹ In this section, Investigators summarized the information that was reportedly known to any Miss Hall's employee about Rutledge's sexual misconduct regardless of whether the employee held a leadership position at the School at the time.

and whether she was “okay.” Employee 6 is deceased and therefore, the Investigators were unable to obtain her perspective about this reported interaction.

Student 7 also stated that Employee 2, who “gossiped extensively” with students, would have been “privy” to Rutledge’s inappropriate relationship with Student 7, noting that Employee 2 would say to Student 7 “be a good girl for Mr. Rutledge,” when she saw Rutledge taking Student 7 off campus. Student 7 stated further that after graduation, Employee 2 and Respondent 8 saw Student 7 at or around Rutledge’s campus home when his wife and children were out of town. Employee 2 did not recall telling Student 7 or any other student to be a “good girl” for Rutledge and denied observing Rutledge spending time alone or going off campus with Student 7 or Student 9. Employee 2 stated that she never suspected that Rutledge was “being inappropriate with students.”

Student 9

Student 9 stated that while she did not report Rutledge’s conduct to any employees at Miss Hall’s, Employee 7, Respondent 8, Employee 2, and Employee 8 observed Rutledge and Student 9 together and may have had knowledge of the inappropriate nature of their relationship.

As detailed above, Respondent 8 and Employee 2 denied having any knowledge of an inappropriate relationship between Student 9 and Rutledge.

Employee 7 stated that she was concerned about Rutledge expressing “favoritism” toward Student 9 but never suspected that he was engaging in sexual misconduct with her. Employee 7 stated that on one occasion, she overheard students commenting that Student 9 was going to “do just fine” on an upcoming research paper for Rutledge. Employee 7 stated that there was an “odd discomforting vibe” to the comment so she confronted Student 9 about it, asking Student 9 “what’s going on?” Employee 7 stated that Student 9 “rolled her eyes” and acted “pissed off” with Employee 7, telling her, “Can we just get on with work?” Employee 7 stated that she was aware of the amount of time Student 9 spent with Rutledge, but that the relationship between Student 9 and Rutledge was “confused” because Student 9 and Rutledge’s daughter were close friends.

Other employees acknowledged observing a closeness between Rutledge and Student 9 while Student 9 was a student but similarly attributed it to Student 9’s close relationship with Rutledge’s daughter.

Employee 8 stated that she noticed Student 9 spending “a lot” of time in Rutledge’s classroom, especially her senior year. On one occasion, Employee 8 stated that Student 9 arrived late to class with a note from Rutledge excusing her tardiness. Employee 8 stated that Student 9 appeared “very flustered and unfocused in class” that day, “seemingly distraught.” Employee 8 stated that at the time, she “chalked” the behavior up to it being an “emotional time” with college approaching. Employee 8 stated that she never suspected Rutledge of sexual misconduct and never observed any inappropriate behavior on his part.

Several alumnae reported that when they arrived at Miss Hall's, they quickly learned of the rumors about Rutledge's inappropriate/sexual relationships with students. Multiple alumnae stated that they heard that Rutledge had a "type" and would "pick his brunette" for the year. Many of the alumnae assumed that faculty knew about the rumors given the small, tight-knight environment at Miss Hall's.

Other alumnae reported that while Rutledge had his "favorite" students and shared close and sometimes fatherly relationships with students, they did not hear nor suspect that he engaged in sexual or inappropriate relationships with students.

Several current and former employees acknowledged hearing rumors about Rutledge's relationships with students but stated that they believed the rumors were untrue or had been investigated and dispelled. Some employees, such as Employee 4 discussed above, stated that they suspected or sensed an inappropriate relationship between Rutledge and students, but felt they could not approach leadership without having personal observations or proof because Rutledge was a revered teacher and close with the School's leadership. Employee 9 stated that she did not report the rumors she heard about Rutledge and Student 9 in part due to her belief that she would have been "scolded" by Norris, particularly since she had not observed anything personally. Employee 10 stated that she sensed a "weird" and inappropriate "energy" between Rutledge and Student 9 but did not report the feeling to leadership because she was new to the school, while Rutledge was a "highly respected" faculty member.

The Investigators interviewed many other current and former employees who stated that they were unaware of Rutledge's sexual misconduct, never heard rumors about him, and were "shocked" to learn about the allegations when the Survivors came forward in 2024.

Summary and Findings of Miss Hall's Knowledge and Response under Jeannie Norris's Leadership

Based on the information gathered during the investigation and as detailed above, the evidence supports that Miss Hall's received information on several separate occasions in the late 1990s and mid-2000s about Rutledge's inappropriate relationships and interactions with students. The evidence supports that the School's leadership failed to adequately investigate and respond to the reported information despite seeking legal advice from Attorney 1 regarding these events.

First, the evidence supports that in the late 1990s, Miss Hall's leadership became aware of Student 17's statement to a group of her peers that Rutledge was "having sex" with a student. While the evidence obtained in Aleta Law's investigation was insufficient to substantiate that Rutledge engaged in the sexual misconduct alleged by Student 17, the evidence, including school records, supports that Miss Hall's leadership was aware of the allegation and took disciplinary action against Student 17 for making the statement. The records and witness accounts do not indicate whether Miss Hall's questioned Rutledge about the accusation or otherwise investigated the substance of Student 17's allegation.

Additionally, in the 2000s, Norris and Chandler received reports related to Student 7 and Student 8 and did not take disciplinary action against Rutledge. Specifically, Employee 1 reported to Norris that Rutledge placed his hand on the “bare shoulder” of Student 8 and that Student 8 told Employee 1 that Student 8 and Rutledge were “very good friends.” In the employee’s disclosure, she identified additional, problematic behaviors by Rutledge that demonstrated inappropriate closeness and interactions with students. The evidence supports that approximately a month later, Norris and Chandler learned through an employee of an allegation made by a third-party student that Rutledge “kissed” Student 7 and told her he “loved” her at graduation. While Rutledge denied kissing Student 7 in his memorandum to Chandler, he admitted to other behaviors (such as going for one-on-one runs with Student 7, giving her a gift, and expressing “love” for her). Such a report should have prompted further investigation, particularly in light of the report received from Employee 1 just a month prior. Notably, Student 8 and Student 7 both stated that they were not contacted by anyone at the School about either report.

The evidence supports that approximately two and half years later, Norris learned that, in violation of her directive to Rutledge to cease contact with Student 8, Rutledge visited Student 8 at her college where he attempted to kiss her and professed his love for her. School records indicate that Rutledge was mandated to meet with the school counselor and seek “professional help.” Rutledge was further advised that any additional “inappropriate behavior” with a current student would result in his “immediate termination.” Rutledge was not otherwise disciplined for this conduct.

Based on the foregoing, the evidence supports that Miss Hall’s failed to act reasonably under the circumstances to investigate and respond to the information that its senior leadership received about Rutledge’s inappropriate interactions and relationships with students in the late 1990s and mid-2000s. While the School took some actions, as documented in school records, to address Rutledge’s inappropriate conduct toward students in the mid-2000s, the Investigators find that the actions taken were inadequate particularly given the strikingly similar reports regarding Rutledge’s conduct toward Student 7 and Student 8, even after being warned about his boundaries and instructed to cease contact with Student 8. It is also significant that Rutledge did not dispute that he made an advance toward Student 8 and acknowledged that he had romantic feelings for her, raising serious concerns about Rutledge’s continued access to students. While Rutledge was given a written warning about this conduct and advised to seek professional treatment, Investigators concluded that this response was unreasonable in light of the known circumstances about Rutledge’s conduct at the time.

Finally, the evidence supports that some employees at the School suspected, heard rumors, or received information about Rutledge’s inappropriate interactions with students. Many of these employees stated that they did not report the information because they believed the rumors were untrue, had been investigated and dispelled, and/or would not be credited by the School’s senior leadership. Investigators concluded that the inadequacy of the School’s response to Rutledge’s misconduct was indicative of larger, cultural issues that were endemic to Miss Hall’s at that time, particularly around reporting employee misconduct and appropriate employee boundaries, as discussed in Section XI.A.h below.

iii. Miss Hall's Knowledge and Response under Peggy Jablonski's Leadership (2012-2013)

The Investigators did not receive any evidence that Miss Hall's former Head of School, Peggy Jablonski, had any knowledge or received any reports of sexual misconduct involving Rutledge.

iv. Miss Hall's Knowledge and Response under Mary Grant's Leadership (2013-2014)

Employee 11 stated that she brought documents contained within Rutledge's personnel file that referred to Rutledge's past "boundary violations" with students to Grant's attention when she became interim Head of School in 2013.

Grant stated that she never saw Rutledge's personnel file, nor did any employee bring any documents contained within Rutledge's personnel file to her attention. Grant stated further that no employee reported concerns about Rutledge's boundary-crossing behavior to her and she did not have any concerns of her own regarding Rutledge's relationships with students.

Apart from this information, the Investigators did not obtain any evidence that Grant had any knowledge or received any specific reports of sexual misconduct involving Rutledge. Based on the information available, the evidence is insufficient to support the finding that Grant was on notice of sexual misconduct while she served as Interim Head of School at Miss Hall's.

v. Miss Hall's Knowledge and Response under Julia Heaton's Leadership (2014-present)

Heaton stated that during her tenure at the School, she never observed any concerning or boundary crossing behavior by Rutledge toward students. Heaton stated that she also did not receive any reports of Rutledge engaging in sexual or boundary crossing behavior toward matriculated students.

2016 Conversation with Norris about Rutledge's Warning Letter in Personnel File

Heaton stated that prior to sending out the 2016 community letter (discussed above), she spoke with Norris to inquire whether Norris had ever received any information regarding sexual misconduct at Miss Hall's. Heaton stated that during the phone call with Norris, Norris relayed an interaction where Rutledge created negative perceptions with a former student and referenced certain documents within Rutledge's personnel file, which Heaton then reviewed.²²

²² Heaton stated that she reviewed two documents regarding Rutledge after speaking with Norris in 2016: (1) the 200[X] notes regarding concerns an employee shared about Rutledge touching Student 8 on the bare shoulder and (2) the 200[X] warning letter to Rutledge about his conduct when he visited Student 8 at college. Heaton stated that she did not review any other documents related to Rutledge, including those that were stored in a separate file maintained by Attorney 1, until they were located during the course of this investigation.

Heaton stated that Norris told her that Rutledge's interactions with Student 8 entailed inappropriate comments about her appearance and touching, such as placing his hand on Student 8's back. Heaton also stated that Norris told her that Rutledge had been reprimanded for his conduct. Heaton stated that Norris felt the situation had been taken seriously and resolved. Heaton stated that Norris told her that no one came forward with sexual assault allegations during Norris's tenure.

2019 Report from Alumna to Miss Hall's Employee 12

Employee 12 stated that in 2019 while on a trip abroad, she visited with an alumna who shared that there was information circulating amongst alumnae about Rutledge's inappropriate behavior toward Student 7. The alumna followed up by sending screenshots to Employee 12 of Instagram messages between herself and another Miss Hall's alumna in which they discuss an "affair" between Rutledge and Student 7 (using Student 7's first name only). Employee 12 forwarded the information reported by the alumna and the messages to Heaton.

Heaton stated that when she spoke with Employee 12, she understood from the conversation that there was discussion about Rutledge on social media, which Employee 12 characterized as gossip, but felt it was important to pass on to Heaton. Heaton stated that the comments on social media related to a former student. Heaton stated that she had no knowledge of the "affair" referenced in the social media messages, and it was the first time that she heard Student 7's first name in connection with Rutledge.²³ Heaton stated that she told Employee 12 to inform the alumna that anyone who experienced or had knowledge of Rutledge's misconduct should contact Heaton directly. However, Employee 12 did not recall any further instructions from Heaton and neither Heaton nor Employee 12 followed up with the alumna about her report. Heaton also confirmed that she did not hear from the alumna directly.

Heaton stated that she did not move forward on or initiate any investigation of the alumna's report to Employee 12. Heaton stated that she did not recall whether she discussed this report with the Board Chair and/or legal counsel, but that would have been her typical practice when receiving information of this nature. Heaton stated that because the information Employee 12 shared was characterized as gossip or rumor from a third party she did not think the protocol established in 2016 for reports of sexual misconduct provided a clear path of action under these circumstances. Heaton stated that she now recognizes such concerns should be treated with the same seriousness as firsthand, direct information and investigated.

2022 and 2023 Miss Hall's Reunions

In 2022 and 2023, Miss Hall's hosted alumnae reunion events. Aleta Law interviewed some alumnae in attendance at the event, who stated that Rutledge's inappropriate sexual relationships with students over the years was a topic of discussion amongst a group of alumnae.

²³ Heaton stated that the alumna only mentioned Student 7's first name in the messages forwarded by Employee 12 and that Heaton did not know Student 7's last name at the time.

In 2022, one alumna from the group stated that she approached Heaton and shared that alumnae at the reunion had been talking about Rutledge's "abuse and inappropriate relations with girls." The alumna stated that she did not provide names of students involved to Heaton. The alumna said Heaton instructed her to have Survivors contact Heaton directly if they wished to share additional information. The alumna stated that she relayed that information to the other alumnae following her conversation with Heaton.

Heaton acknowledged that the aforementioned alumna approached her at the reunion, expressed negative views about Rutledge and alluded to rumors about Rutledge with former students. Heaton confirmed that she told this alumna to reach out to her or have others reach out to her if she/they wished to share additional information and stated that no one followed up with her. Heaton stated that she discussed the comments at the reunion with Miss Hall's Board of Trustees Chair, Ault, who the alumna also spoke to regarding her concerns about Rutledge, and Ault advised her not to take any further steps to investigate or respond at that time.

The following year at the Miss Hall's 2023 reunion, another alumna separately approached Heaton and Respondent 8 and questioned why Rutledge was still employed at Miss Hall's given the rumors of him having a sexual relationship with a former student. Heaton and the alumna both stated that Heaton told the alumna that it was not the right time to discuss the matter and instructed the alumna to follow up with her by phone. After the reunion, the alumna stated that she attempted to call Heaton on two occasions and never received a return call from Heaton.

With respect to Respondent 8, the alumna stated that Respondent 8 replied, "I don't see anything. I don't know anything. I don't say anything." Respondent 8 acknowledged that she may have told the alumna, "I don't know anything," but denied that she told the alumna, "I don't see anything" or "I don't say anything." Respondent 8 stated that she told the alumna she had "nothing to say" to the alumna about Rutledge's employment and directed the alumna to speak directly with Heaton if the alumna had concerns.

Heaton explained that she believed the information shared with her by the alumnae at both reunions related to events documented in Rutledge's personnel file. Heaton stated that she believed, based upon what she learned from Norris directly, that the events detailed in Rutledge's personnel file had been handled by Norris. In her interview with Investigators, Heaton acknowledged, expressed regret, and took responsibility for not returning the alumna's call or investigating the third-party concerns about Rutledge further to determine if they were different from the events she understood had been resolved by Norris.

Student Refers to Rutledge as a "Pervert" in February 2024

About a month prior to Student 9's report, in February 2024, a student reported to a Miss Hall's employee that another student made comments that Rutledge was a "pervert," was "creepy" and "liked kids." Heaton and administrators promptly investigated the statements, and the student told them that her comments were meant as a "joke," and she had no knowledge of any sexual misconduct or inappropriate behavior by Rutledge.

Information Received through Survivors' Attorneys in March-April 2024

On March 27, 2024, Student 9's attorney sent a letter to Heaton, notifying her of Rutledge's sexual misconduct toward Student 9. Upon receipt of the letter, Heaton immediately placed Rutledge on administrative leave and informed him that he was not permitted on campus or to have any communication with members of the campus community.

On March 28, 2024, Heaton emailed Rutledge, outlining the conditions of his leave, informing him that Student 9 was the alumna who brought the report forward, and instructing him not to destroy any information pertaining to Student 9 in the meantime.

On March 29, 2024, Rutledge submitted a letter of resignation. In response, Heaton instructed Rutledge to vacate the Miss Hall's owned house that he occupied. Heaton stated that she immediately notified campus safety to ensure Rutledge could not access campus.

On April 3, 2024, Heaton emailed all employees and students' families notifying them of Rutledge's resignation from the school "for personal reasons," effective immediately. Heaton stated that she wishes she could have shared more information with the community about the allegations after receiving Student 9's letter but was constrained by legal and privacy considerations and therefore refrained from sharing the details of allegations against Rutledge until the School had an opportunity to investigate.

Five days later, on April 8, 2024, Miss Hall's sent a follow up communication, notifying the Miss Hall's Community that it had received information from an alumna stating that Rutledge engaged in "inappropriate sexual conduct" when this alumna was a student and following her graduation.

A week later, on April 15, 2024, Miss Hall's notified the community of additional information received by the School from other Survivors through their counsel. The communication further notified the community of its authorization of an external, neutral investigation by Aleta Law. The letter encouraged members of the Community with information to contact the Investigators.

Summary and Findings of School's Knowledge and Response under Heaton's Leadership

Based on the information obtained during the investigation and as detailed above, the evidence supports that Heaton and Ault received third-party information regarding Rutledge's inappropriate relationships with former students. Investigators determined that this information should have been investigated further rather than relying upon Norris's representations or waiting for firsthand reports to come forward before commencing an investigation. The evidence supports that when Heaton did receive a firsthand report of sexual misconduct involving Rutledge for the first time in 2024, she took prompt, appropriate action to investigate the report and safeguard students.

The evidence supports that in 2016, under Heaton's leadership, Miss Hall's encouraged the community to report employee sexual misconduct that occurred at the School and established a

protocol for handling these reports. At that time, Heaton spoke with Norris to ascertain whether she was aware of any past sexual misconduct, and Norris shared that Rutledge had inappropriate interactions with a former student, Student 8, which led to a disciplinary warning in his personnel file. Heaton stated that, based on her conversation with Norris, she believed that Rutledge's conduct had been appropriately addressed by Norris.

Additionally, in 2019, Heaton received a report from an employee that an alumna disclosed that Rutledge had an "affair" with a former student, referring to Student 7. Student 7 was identified in the messages by her first name only. The messages provided by the alumna were forwarded to Heaton. Heaton acknowledged that she did not contact the alumna who shared the information or otherwise investigate the report.

The evidence further supports that in 2022 and 2023, alumnae at reunion events approached Heaton to question her about why Rutledge was still at the School given the rumors that he had an inappropriate relationship with a former student. Heaton acknowledged that she did not follow up on the information shared by these alumnae. Heaton explained that she believed the concerns raised by the alumnae related to the information shared by Norris and were already addressed.

In February 2024, Heaton and administrators appropriately and promptly investigated a report that a student referred to Rutledge as a "pervert" who "liked kids" to understand the basis for this student's comments. The student denied having any knowledge of any inappropriate behavior by Rutledge and stated that these comments were made in jest.

The evidence supports that the first time Heaton received a firsthand report of sexual misconduct by Rutledge was in late March 2024 when she received a letter from Student 9's attorney. In response, Heaton immediately placed Rutledge on leave while the School investigated the report. The next day, Rutledge resigned from Miss Hall's and was promptly removed from campus. After receiving additional reports from other alumnae, through their counsel, about Rutledge's sexual misconduct, Heaton informed the Miss Hall's community of the allegations and engaged Aleta Law to investigate the reports.

There was no evidence of sexual misconduct by Rutledge during Heaton's tenure at the School. There was, however, evidence obtained that Rutledge engaged in boundary-crossing behavior toward students in the 2010s and up to his separation from Miss Hall's.

In sum, the evidence supports that Miss Hall's should have investigated and responded to the third-party reports that Heaton and Ault received from alumnae regarding Rutledge's past sexual misconduct. Investigators determined that their failure to follow up on these reports was based, in large part, on Norris's representation that these issues were previously appropriately resolved as well as their uncertainty regarding the protocol for investigating and responding to these third-party reports. During the investigation, Heaton and Ault both acknowledged and expressed remorse for not following up on the alumnae reports at that time.

Investigators found that the School took reasonable and appropriate actions after receiving Student 9's firsthand account of sexual misconduct to separate Rutledge from the school community and investigate his conduct. Investigators also found that under Heaton's leadership the School made efforts to change the culture and establish a protocol to encourage reporting of sexual misconduct, which had not been in place in the past.

f. Board of Trustees' Knowledge and Response

Described below is the information provided by members of Miss Hall's Board of Trustees related to the Trustees' knowledge of Rutledge's sexual misconduct.

As detailed above, Ault, who has served intermittently on the board since the 2000s, recalled an alumna implying on one occasion in or around 2006 that Rutledge was "inappropriate" with students. Ault stated that this alumna also approached her at the 2022 reunion and told Ault that she couldn't "believe" that Rutledge was still at the school. Ault stated that she instructed the alumna to contact Heaton if she had a "claim to make" or if she had knowledge or information related to misconduct.

Trustee 1, who has been on the board for two years, stated that when she was a student at Miss Hall's, she heard "rumors" or "speculation" about Rutledge having "close" or "special" relationships with "one or two" students that felt "a little creepy" or "a little weird." Trustee 1 stated that she never heard anything "specific," and never heard that Rutledge had sexual contact with any student. Trustee 1 stated that she did not disclose the information she heard as a student with the board when she joined because she did not feel that she had sufficient knowledge or information to share.

Trustee 1 stated that she was also present for conversations amongst alumnae at the 2022 reunion in which Rutledge's past relationships with students were discussed. Trustee 1 stated that she did not report the information she heard at the reunion when she joined the board months later because she understood that another alumna had already spoken to Heaton.

Trustee 2, who has served on the board of trustees since the 2000s, stated that early in her tenure with the board while Norris was Head of School, there was an "HR issue" with Rutledge and she was informed that Norris had handled the issue and that Norris placed a "letter" in Rutledge's personnel file.

Trustee 3, who has been a member of the board since the late 1990s, stated that on one occasion in the 2000s, she and Norris discussed how Rutledge had gone to get breakfast with a student in Lenox. Trustee 3 stated that Norris mentioned how Rutledge had been previously told "not to do that." Otherwise, Trustee 3 stated that she was unaware of any information about sexual misconduct involving Rutledge.

Trustee 4, who has been on the board since the 2010s, stated that after graduating from Miss Hall's, she heard "through friends" that something had happened between Student 7 and

Rutledge that was “clearly inappropriate.” Trustee 4 stated that she heard the School had “looked into” the incident and “nothing [inappropriate] had been found” by the School.

g. Culture at Miss Hall’s Over Time

In addition to the specific events and reports discussed above, the Investigators heard key themes about the School’s culture during the relevant time periods relating generally to the School’s handling of sexual misconduct and how Rutledge’s sexual misconduct, in particular, went unchecked for decades at the School.

i. Boundaries Between Employees and Students

Aleta Law heard from several alumnae and employees from the 1990s and 2000s who described a school culture that lacked education around boundaries, grooming, and sexual misconduct identification and reporting. Individuals reported that physical contact with students by some teachers, including hugging or placing an arm around a student’s shoulder, was “normalized.” Employees were encouraged to have a close, personal relationship with students and spending time alone with students was “commonplace.” While many individuals stated that this close, personalized culture made their experience at Miss Hall’s a positive one, several others reported how loose boundaries fostered an environment that isolated students and allowed for sexual misconduct to occur.

Aleta Law heard from numerous alumnae and employees in the 1990s and 2000s that favoritism was also a prominent issue at Miss Hall’s. These individuals told investigators that certain longtime faculty members, such as Respondent 8 and Employee 2, were known to have “favorite” students, whom they afforded “special” treatment. Alumnae reported that the culture of favoritism at Miss Hall’s amongst some faculty members, and in particular Respondent 8, created an “in-crowd versus out-crowd attitude”; students who were not favorites felt like they did not fit in, whereas those who were “favorites” received special attention and “perks,” such as being able to watch television in Respondent 8’s apartment after hours and take trips off campus to go to local shops and restaurants.

Current and former employees told Investigators that Heaton’s leadership coincided with the evolution of societal norms around boundaries and increased awareness amongst employees of appropriate student-teacher relationships in the context of a boarding school. Whereas alumnae and faculty reported that boundaries were often blurred and loose under Norris’s leadership for some faculty, the culture under Heaton’s leadership set out clearer expectations and training around spending time alone or off campus with students in non-academic settings. School records indicate that under Heaton’s tenure, the School began holding regular mandatory reporting and boundary training for all staff. Investigators were told that as a result, students increasingly stopped spending time in faculty members’ homes and the culture that encouraged “friendships” and “favoritism” between teachers and students has diminished under Heaton’s leadership. Heaton and others noted that Miss Hall’s nevertheless continued to have a culture of hugging and close relationships amongst employees and students.

ii. School's Response to Reports of Sexual Misconduct

Many former students and some employees also described a culture at Miss Hall's under Norris's leadership that silenced reports of sexual misconduct against teachers, which were characterized as "gossip" unless "concrete proof" was offered. Alumnae and employees from the 1990s cited the case of Student 17, described above, who was removed from school for accusing Rutledge of sexual misconduct. Alumnae and former employees also stated that the culture at the School historically "humiliated" students through public announcements of students' disciplinary issues, instilling an atmosphere of fear and reluctance to come forward with information. In addition, several alumnae and employees recalled how Norris would give "all-school lectures" about "slander" and how "spreading rumors" could "ruin" the lives of those who were subject to them following accusations against faculty members. Employees and former students stated that these actions caused students and faculty members to feel like they could not share concerns with Norris and Chandler, particularly if those concerns related to faculty members who were considered "favorites" of Norris and Chandler, such as Rutledge or Respondent 8.

As already noted, this culture changed under Heaton's leadership. Through faculty and staff trainings, community outreach, and communication from leadership, the School encouraged reporting of sexual misconduct and established a protocol for handling reports. While there have been deficiencies in the School's response, as already noted, Investigators found that Miss Hall's response to sexual misconduct markedly evolved and improved under the School's current leadership.

iii. Dynamics of Rutledge's Misconduct

Aleta Law heard from many current and former Miss Hall's community members who questioned how Rutledge could remain at Miss Hall's for as long as he did. As explained above, while several community members believe that "everyone" at the school knew about Rutledge's misconduct, many longtime employees stated that they did not know and were "shocked" to learn about the Survivors' experiences when the reports became public.

Some current and former employees expressed the belief that just as Rutledge groomed students and their parents, he also groomed the administration and faculty members to have colleagues who could protect and "vouch" for him. Alumnae and employees stated that Rutledge was "close" with Norris and Chandler and "had a lot of power" at Miss Hall's. These former students and employees described a teacher who was a "celebrity" in the community, "larger than life," charismatic, bold, egotistical and often the center of attention. Employees described a culture of favoritism amongst school leadership, with Rutledge being a "favorite" of Norris and Chandler. In addition to cultivating close relationships with faculty, Rutledge similarly garnered the affection of parents who "adored" Rutledge.

Miss Hall's alumnae and current and former employees spoke to the sophistication of Rutledge's grooming over time. One longtime employee, Employee 3, stated that after making the report to leadership in the 2000s about Rutledge's conduct toward Student 7 at graduation, Rutledge told

her, “Thanks so much for reporting this,” and that girls “can get crushes” which made Rutledge “feel awkward.” Employee 3 stated that Rutledge told her it has “happened before.” Employee 3 stated that after the conversation with Rutledge, she believed the report was “unfounded” and felt sorry for Rutledge. Employee 3 stated that on other occasions, Rutledge went “above and beyond” in expressing his support for, and adherence to, school protocol around boundaries with students. Employee 3 stated that “looking back,” these actions seemed to be a way to “cover himself” and prevent suspicions about his behavior.

Another employee who began working at the school in the 2010s, Employee 13, stated that during his first year as an advisor he took his advisee, who was “struggling,” off campus to McDonalds. When they returned, Employee 13 stated that Rutledge pulled him aside and told him he should “never” leave campus “alone with a student.”

B. Substantiated Reports of Sexual Misconduct Involving Other Miss Hall’s Employees

Described below in subsections a-g are the reports of sexual misconduct involving other former Miss Hall’s employees that were substantiated by a preponderance of the evidence.

a. Respondent 1

Respondent 1 was a faculty member at Miss Hall’s in the 1990s. The Investigators received multiple third-party accounts that Respondent 1 had a sexual or inappropriate relationship with Student 19. Reports included Miss Hall’s Alumnae (some of whom later went on to work at Miss Hall’s) hearing about Respondent 1’s sudden departure from Miss Hall’s, which they assumed to be due to his “inappropriateness” with Miss Hall’s student, Student 19. One alumna recalled that Student 19 “often” spent time in Respondent 1’s apartment.

Miss Hall’s then-Head of School, Hall, stated that she learned about Respondent 1’s inappropriate relationship with Student 19 through Student 19’s father. Hall stated that Student 19’s father overheard a phone conversation between Student 19 and Respondent 1 that suggested there was “something very inappropriate going on,” including a suggestion of “attraction” and “furthering a relationship beyond a mere friendship.” Hall stated that when she confronted Respondent 1 about the information reported to her, he did not “resist” what she shared, nor did he object to her decision to fire him as a result of the misconduct.

Respondent 1 was unresponsive to the Investigators’ attempts to seek his participation in an interview.

Given the number of third-party reports from alumnae regarding Respondent 1’s inappropriate relationship with Student 19, which was corroborated by Hall, Investigators determined that a preponderance of evidence supports that Respondent 1 engaged in sexual misconduct toward Student 19.

i. School's Knowledge & Response

Based on the information gathered during the course of the investigation, the Investigators determined that it was known by Miss Hall's leadership at the time that Respondent 1 had an inappropriate relationship with Student 19 and Miss Hall's took corrective action to address the sexual misconduct. Hall confirmed that she had knowledge of the inappropriate relationship and that she decided to terminate Respondent 1's employment because of the information reported to her. Though Miss Hall's did not have personnel records for Respondent 1, the multiple third-party reports from alumnae and employees corroborate Hall's account that Respondent 1 was promptly removed from the school due to his inappropriate relationship with Student 19.

Accordingly, the evidence supports that Miss Hall's received notice of Respondent 1's inappropriate relationship with Student 19 at the time and took appropriate steps to address the sexual misconduct by terminating Respondent 1's employment.

b. Respondent 2

Respondent 2 was a faculty member at Miss Hall's in the 1990s. The Investigators received multiple third-party reports from alumnae that Respondent 2 had inappropriate relationships with one or more students when she worked at Miss Hall's, including Student 20 and Student 21.

One alumna who later went on to work at Miss Hall's stated that Student 20 confirmed after she had graduated that she had a relationship with Respondent 2. Another alumna/employee stated that she heard "rumors" while she was a student about Respondent 2 and Student 20, and students assumed Respondent 2 was "having a fling" or "affair" with Student 20.

Another alumna stated that she believed Respondent 2 and another student, Student 21, were "sleeping together," stating that she saw them "holding hands," "snuggling" and "splitting apart when you walked into a room."

Respondent 2 agreed to participate in an interview as part of the Investigation. During her interview, Respondent 2 acknowledged that she had a "romantic" and "inappropriate" relationship with Student 20 while Student 20 was a student at Miss Hall's. Respondent 2 stated that she and Student 20 made each other mix tapes, wrote notes to each other, and spent time together in Respondent 2's apartment in the evenings after students were supposed to be in bed. Respondent 2 denied that she had any sexual contact with Student 20 beyond a kiss on one occasion, which she said Student 20 initiated. Respondent 2 stated that she and Student 20 remained "good friends" after she graduated from Miss Hall's.

Respondent 2 denied having a romantic and/or sexual relationship with any other student at Miss Hall's, but acknowledged that one student, Student 21, pushed the boundaries of an appropriate student-teacher relationship and attempted to have an intimate relationship with her. Specifically, Respondent 2 stated that Student 21 would come to her apartment, come into her office and close the door, and call Respondent 2 by her first name. Respondent 2 stated that she did not

reciprocate Student 21's advances. Respondent 2 acknowledged that there were "rumors" circulating about Respondent 2 and Student 21, but Respondent 2 stated the rumors were not true. Respondent 2 stated that she and Student 21 brought the rumors to Chandler's attention in order to relay that they were untrue.

Based on the information available, including Respondent 2's admission that she kissed and had a romantic relationship with Student 20, Investigators determined that a preponderance of evidence supports that Respondent 2 engaged in sexual misconduct toward Student 20. The evidence is insufficient, however, to support a finding that Respondent 2 engaged in sexual misconduct with Student 21 or any other student.

i. School's Knowledge & Response

Based on the information gathered during the course of the investigation, the evidence is insufficient to determine whether Miss Hall's was on notice of Respondent 2's sexual misconduct toward Student 20.

Chandler declined to participate in the investigation and Miss Hall's did not have any record of reports of misconduct involving Respondent 2. The Head of School at the time, Hall, stated that she was unaware of any sexual misconduct or inappropriate student relationships involving Respondent 2.

c. Respondent 3

Respondent 3 was a teacher at Miss Hall's in the 2000s. Aleta Law received several firsthand and third-party accounts that Respondent 3 had inappropriate relationships with students while he was a teacher. It was also reported that Respondent 3 is currently employed at another school.²⁴

Student 22

Aleta Law received a firsthand account from one alumna, Student 22, who stated that Respondent 3 fostered an "emotional" relationship with her while she was a student. Student 22 stated that Respondent 3, who was her teacher at the time, spent one-on-one time with her in the school vehicle and in his classroom. Student 22 stated that Respondent 3 chose to chaperone weekend events that she was attending to "spend more time together." Student 22 stated that she sat close to Respondent 3 in front of the school vehicle on the way to events, and Respondent 3 would place his hand on her upper leg during the car rides. Student 22 stated that Respondent 3 would "constantly" tell her that he "loved" her. Student 22 stated that Respondent 3 would also write poems for her on the classroom whiteboard so that she would see them during class. Student 22 stated that halfway through the school year, she switched advisors so that Respondent 3 could serve as her advisor. Student 22 stated that on one occasion, Respondent 3 "hugged" her for "a

²⁴ Unless otherwise noted, Aleta Law did not obtain information regarding whether the Respondents included in this report were currently employed by other schools or working with minors at the time of the investigation.

very long time” and told her that “he doesn’t want it to get past that, because then it would be wrong.” Student 22 stated that over a school break, she “lost [her] virginity” to someone and when she told Respondent 3 about it, he was “extremely upset,” “barely talked to her,” and “tear[ed] up.”

Student 22 stated that she and Respondent 3 communicated over Facebook messenger and on the phone outside of school hours. Student 22 stated that one of her friends saw Facebook messages between Student 22 and Respondent 3 saying “I love you” to one another and told her other friends about it. Student 22 stated that her friends then stopped talking to her and bullied her because of her relationship with Respondent 3. Student 22 stated that when her friends discovered the relationship, Student 22 stopped talking to Respondent 3. Student 22 stated that the School found out about the relationship, and she “assumed” that one of her friends had reported it. Student 22 stated that around the time that the School found out about the relationship, Respondent 3 messaged her and was “freaking out” about it and discouraged her from saying anything to the School about the relationship. Student 22 stated that she was questioned by Employee 4 about the relationship. Student 22 stated that she acknowledged to the employee that she and Respondent 3 were “close” but denied that anything “inappropriate” was happening. Student 22 stated that she was “scared” to admit the nature of the relationship. Student 22 stated that “soon after that,” before the end of the school year, Respondent 3 left the school. Student 22 stated that approximately ten years after she graduated, Respondent 3 messaged her on Instagram. Student 22 provided a copy of the messages, in which Respondent 3 asked Student 22 whether she would “consider” talking to him so that Respondent 3 could “reconcile what happened and apologize” to her. Student 22 stated that she did not respond to Respondent 3’s message.

In addition to this firsthand account, Investigators received numerous third-party accounts from alumnae and employees corroborating that Respondent 3 had an inappropriate relationship with Student 22. Alumnae and employees stated that Respondent 3 showed “obvious” favoritism toward Student 22 and spent time alone with her in his classroom and off campus. A group of alumnae stated that to confirm their suspicions of an inappropriate relationship, they took Respondent 3’s laptop and found “explicit” messages between Student 22 and Respondent 3. The students stated, and their messages confirmed, that when Respondent 3 discovered the students were aware of his relationship with Student 22, he confronted the students. Alumnae and employees from the time stated that the students subsequently reported the information to Miss Hall’s employees. Employee 4 stated that after the information was reported by students, she and Norris investigated the allegations. Employee 4 stated that Respondent 3 “resigned” because of the situation.

Student 23

Student 23 stated that Respondent 3 called her into his office, locked the door from the inside and began to rub her shoulders. Student 23 stated that Respondent 3 also spoke to her in a very “suggestive way” and commented on her appearance. Student 23 stated that she immediately left Respondent 3’s office and went to report what had just occurred to Norris. Student 23 stated

that Norris appeared to take it “very seriously,” and Respondent 3 was gone from Miss Hall’s three weeks later.

Student 24

Student 24 stated that she had a “flirtatious,” “courting-like” relationship with Respondent 3. Student 24 stated that Respondent 3 gave her a gift, made her feel “special,” and commented on her short skirt, telling her that her legs were “looking good.” Student 24 stated that while she felt the conduct was “weird,” she did not report it to anyone at the time.

Student 25

Student 25 stated that Respondent 3 engaged in inappropriate communications with her after he left Miss Hall’s. Student 25 stated that when she was a freshman at Miss Hall’s and while Respondent 3 was still employed at the school, he reached out to her on Facebook, even though Student 25 was not in any of his classes and the two had never spoken face-to-face at School. Student 25 stated that after engaging in “friendly,” “back and forth” conversation on Facebook about music and literature, Respondent 3 approached Student 25 at school, commented on “not seeing [her] around with other friends,” and suggested that she write something for the school newspaper to “give [her] a voice.” Student 25 stated that Respondent 3 also gave her gifts, such as coffee cups from Starbucks and candy.

Student 25 stated that Respondent 3 was dismissed from the School at the end of her freshman year. Student 25 stated that Respondent 3 “ramped up communicating” with her over Facebook and Skype once he left the school, when Student 25 was 14 or 15 years old. Student 25 stated that Respondent 3 would tell her about “troubles with his wife” and “midlife crises type stuff.” Student 25 stated that Respondent 3 would say things to make her “feel special,” such as comments about her “difficult background and wanting the best for [her].” Student 25 stated that Respondent 3 was a “supportive person” in her life when she “didn’t really have any.”

Student 25 stated that “weirder stuff” started to happen the summer after her freshman year. Student 25 stated that Respondent 3 became “flirtatious” with her. Student 25 stated that when she was 15 or 16 years old, Respondent 3 asked her whether she had ever taken naked pictures of herself. Student 25 stated that when she was 16 or 17 years old, Respondent 3 told Student 25 that he was on “male enhancement” supplements and was “more of a man now than ever.” Student 25 stated that when she was 16 years old, she would post photos with her boyfriend and Respondent 3 would message her saying, “How am I supposed to compete with that?”

Student 25 stated that when she was a sophomore or junior at Miss Hall’s, between 16 or 17 years old, Respondent 3 moved and started asking her whether she would “ever consider being with him.” Student 25 stated that she replied “No” and otherwise rejected Respondent 3’s advances. Student 25 provided copies of messages between Student 25 and Respondent 3. In the messages, Respondent 3 writes to Student 25, telling her to “come over,” writing further “it’s safe here” and

“I will keep you warm.” Respondent 3 also tells Student 25 that she is the “cutest one” of her classmates.

Student 25 stated that when Respondent 3 asked her to visit him where he lived, she “got really scared,” and decided to tell her Miss Hall’s advisor about the communications. Student 25 stated that her advisor took her to see Norris, who seemed to take the situation “very seriously,” and reported it to the local police. Student 25 stated that she spoke with a police investigator about the situation.

Student 25 stated that she also spoke with Chandler. Student 25 stated that Chandler initially did not “believe” her when she reported Respondent 3, so she showed Chandler the messages between them. Student 25 stated further, “I remember the look on her face when she looked at the messages and saw that's really him. These are really his messages.”

Student 25 stated that she informed Respondent 3 that she had reported him, and he expressed to Student 25 that he was “scared.” Student 25 stated that after reporting Respondent 3, their communications ceased for about two years, and then Respondent 3 began to reach out to her again. Student 25 stated that in her 20s, Respondent 3 also “appeared” at places where she was living at the time, such as a farmer’s market and a ball game. Student 25 stated that around this time, Respondent 3’s wife messaged her. Student 25 provided copies of the messages between Student 25 and Respondent 3’s wife, who told Student 25 that she had seen messages between Student 25 and her husband and wanted to know “the extent of [their] relationship.” Student 25 asked Respondent 3’s wife whether Student 25 should be concerned that Respondent 3 “might be angry” with Student 25 or might “find” Student 25. Respondent 3’s wife replied, “Not at all. He knows his role in what happened and is remorseful. I wanted to hear your, less biased, explanation.”

Multiple other alumnae reported that Respondent 3 fostered close, personal relationships with them, discussed his personal life and marriage, and commented on their appearances.

Respondent 3, through his counsel, generally denied the allegations against him and declined the opportunity to participate in an interview with the Investigators. Given the multiple firsthand and third-party reports regarding Respondent 3’s interactions with students, the evidence supports that Respondent 3 engaged in grooming behavior and sexualized communications toward several Miss Hall’s students, as well as inappropriate physical contact, including rubbing one student’s shoulders and touching another student’s upper leg.

i. School’s Knowledge & Response

As explained above, interviews with alumnae and employees support that Miss Hall’s leadership had knowledge of allegations that Respondent 3 engaged in serious boundary violations toward multiple students.

In the case of Student 22 and Student 23, the information gathered supported that leadership was informed of Respondent 3's potential inappropriate relationship with Student 22 and Student 23, took the information seriously, and shortly after these concerns were raised with Miss Hall's leadership, Respondent 3 left the school and did not return to Miss Hall's.

With respect to the report involving Student 25 after Respondent 3 left the school, the evidence provided by Student 25 demonstrates that School leadership was informed of Student 25's and Respondent 3's communications and reported the information to the police. Student 25 further stated that security officers at the School were notified to be on the lookout for Respondent 3 and to prevent his access to the School. The evidence is insufficient to ascertain what, if any, additional action Miss Hall's leadership took upon learning of Student 25's experience.

Alumnae stated that although Miss Hall's took swift action to address the reported misconduct, students felt that leadership disapproved of them bringing the information forward. In the case of Student 22, alumnae stated that shortly after the School received the third-party report about Respondent 3's conduct toward Student 22, Norris held a meeting in which she lectured the "entire school" against "spreading rumors" and how rumors can be "detrimental" to "reputations." One alumna involved in reporting stated that the group of reporters felt Norris was "obviously speaking to [them]" and telling them to "shut" their "mouths."

As addressed above, the investigation cast light on a culture at Miss Hall's that suppressed the disclosure of information related to sexual misconduct out of fear that it could be characterized as "gossip" or "slander." In that regard, Employee 7 stated that she had warned Chandler about Respondent 3 when he was hired. Employee 7 stated that she told Chandler that Employee 7 heard that Respondent 3 was "inappropriate with girls and women" at his previous school. In response, Employee 7 stated that Chandler told her the information was "hearsay" and to "mind [her] own business."

In addition, two of the students who brought forward information about Respondent 3 to Miss Hall's administration, Student 26 and Student 27, stated that they were not invited to return to Miss Hall's the following year, which they believe was in retaliation for their reporting of sexual misconduct. While Student 27 was ultimately permitted to return, Student 26 was not. The evidence was ultimately insufficient to support a finding of retaliation as school records and employee accounts established that the decision not to invite Student 26 to return was based on legitimate, academic reasons.

In the case of Student 25, Student 25 stated that following her report, Miss Hall's leadership "treated [her] very differently," which "made for a very difficult school experience." Student 25 stated that after reporting the interactions with Respondent 3, Miss Hall's leadership required her to "undergo a psychological evaluation" before allowing her to return to Miss Hall's. Student 25 stated that following her allegations, her advisor, who was male, told her that he was "no longer comfortable being alone in a room" with Student 25. Student 25 stated that she "wasn't allowed" to discuss the experience with others, which was "very isolating" for her. Student 25 stated further that "any hint" of her discussing the experience with others "was met with punishment"

by leadership. Student 25 stated that she specifically recalls Chandler “pulling [Student 25] aside,” and telling her not to “call attention” to herself. Student 25 also stated that prior to reporting Respondent 3’s conduct, she had never been cited for any disciplinary infractions at Miss Hall’s, but afterward, she was brought before the Student Faculty Advisory Committee for incurring phone charges to the School.

Several alumnae and employees commented on how, from their perspective, the School promptly addressed reported sexual misconduct in the case of Respondent 3 but failed to appropriately act in the case of Rutledge. One employee stated, “I’ve spent a lot of time wondering why that situation was addressed when allegations about [Rutledge’s] relationships weren’t addressed. And I keep coming back to the favoritism piece. [Rutledge] was a favorite of [Norris], and I think that she protected him,” whereas Respondent 3 was “a relatively new teacher” and “not a favorite.”

d. Respondent 4

Respondent 4 was a teacher at Miss Hall’s in the 1990s. The Investigators received firsthand and third-party accounts that Respondent 4 engaged in inappropriate, sexualized behavior toward students.

Two alumnae interviewed, Student 28 and Student 29, stated that they experienced “constant sexual harassment” in Respondent 4’s class, including Respondent 4 commenting on girls’ appearances and clothing. Student 28 stated that Respondent 4 would graph pictures of breasts on the board in his classroom and have students “come up with the coordinates of the nipples.” Both alumnae stated that in order to get extra help in Respondent 4’s class, students had to go to his apartment. Student 28 stated that on one occasion, she went to Respondent 4’s house for extra help and Respondent 4, who was drinking and smelled of alcohol, kept insisting that she sit closer to him on the couch.

Both alumnae stated that they separately reported their concerns to Chandler, who was dismissive of their reports, and advised the students to keep their concerns quiet or else there would be “consequences.” Student 29 stated that Chandler told her not to “gossip” because it could “ruin” Respondent 4’s reputation.

Aleta Law also heard from two Miss Hall’s employees about Respondent 4’s inappropriate behavior. Employee 7 reported that a student shared with her that Respondent 4 made the student “uncomfortable” by asking students during class to graph the distance between nipples on breasts. Employee 7 stated that she “immediately” reported the information to Chandler and was “basically told to mind [her] own business.” Employee 7 stated that she later heard from students that when they went to Respondent 4’s apartment for extra help, he would have pornography and alcohol in his apartment and “smelled of booze.”

Respondent 4 declined to be interviewed in the investigation.

Based on the multiple firsthand and corroborating witness accounts received, Investigators determined that a preponderance of evidence supports that Respondent 4 engaged in sexualized behavior and comments toward students.

i. School's Knowledge & Response

As explained above, two alumnae and one employee stated that they separately brought their concerns about Respondent 4's inappropriate, sexualized behavior to the attention of Chandler. All of these individuals stated that Chandler was dismissive of their reports. Chandler did not agree to participate in Aleta Law's investigation, and therefore, the Investigators were unable to speak with her about these reports or about the School's knowledge of Respondent 4's sexual misconduct. Additionally, Miss Hall's was unable to locate Respondent 4's personnel file or any records pertaining to the inappropriate behavior.

Based on the limited information available, the evidence is insufficient to make a finding as to how Miss Hall's addressed Respondent 4's sexual misconduct apart from what was shared about Chandler's dismissive response.

e. Respondent 5

Respondent 5 was a college advisor at Miss Hall's in the 1980s. One alumna, Student 30, stated that she and other students went to Respondent 5's house, where they consumed alcohol. Student 30 stated that she woke up the next morning naked and alone in Respondent 5's bed without any memory of how she got there or what happened. Student 30 stated that while she does not have a memory of sexual activity occurring and does not believe she was "rape[d]," she does think that there was "probably a whole lot of inappropriate fondling or mauling" given the circumstances.

Student 30 stated that she did not report what happened to anyone at Miss Hall's at the time of the conduct. Student 30 stated that she first reported the incident to Miss Hall's in 2016 in response to the School's community letter.

Respondent 5 is deceased and therefore, the Investigators were unable to obtain his perspective about this Student 30's account. Miss Hall's was unable to locate Respondent 5's personnel file or any records pertaining to these events.

Based on the firsthand account received, Investigators determined that a preponderance of evidence supports that Respondent 5 engaged in sexual misconduct toward Student 30.

i. School's Knowledge & Response

Student 30 stated that she did not report Respondent 5's conduct to any employee at the School until 2016, in response to Miss Hall's community letter. At the time, Miss Hall's established a protocol for receiving reports from survivors of sexual misconduct. Student 30 stated, and School records confirmed, that Student 30 met with Heaton in 2016 and shared her experience at that

time. By the time of Student 30's disclosure to Heaton, Respondent 5 was no longer employed at the School and was retired. Respondent 5 has since died.

Miss Hall's was unable to locate Respondent 5's personnel file or any other documents regarding the reported events apart from Student 30's disclosure to the school in 2016. Given the limited information available, there is insufficient evidence to determine whether any employee at the School was on notice of Respondent 5's conduct prior to Student 30's report to Miss Hall's in 2016. In terms of the School's response in 2016, Student 30 stated that she thought the School was checking "the right boxes" and "trying to be sensitive" in its process, but felt unsatisfied by the School's communication regarding how her report was ultimately addressed.

f. Respondent 6

Respondent 6 was a gym teacher at Miss Hall's in the 1940s/1950s. Student 31 stated that while she was a student at Miss Hall's, Respondent 6 and another unidentified gym teacher called her into a private room, asked her to remove her clothes, and took photos of the alumna in her bra and underwear. Student 31 stated that the teachers did the same for other girls in her class. Student 31 stated that the teachers gave her one of the photos and instructed her to share the photo with the other girls in class for comparison.

Student 31 stated that she did not report the teachers' behavior to an employee at Miss Hall's at the time and avoided the teachers for the rest of her time at Miss Hall's. Student 31 stated that she first reported the behavior to Miss Hall's in 2016 in response to the School's community letter and felt the School's response at the time was "entirely appropriate."

Aleta Law was unable to ascertain the identities of the gym teachers in question. Student 31 also stated that these employees are now deceased.

Based on the firsthand account received, Investigators determined that a preponderance of evidence supports that Respondent 6 and another unidentified employee engaged in sexual misconduct toward Student 31 and other students by requiring them to undress and taking pictures of them in their bra and underwear, which they were then instructed to share with other students.

i. School's Knowledge & Response

Student 31 stated that she did not report Respondent 6's sexual misconduct to any employee at Miss Hall's until 2016 in response to the community letter. School records confirm that she spoke with Heaton and a member of the Board of Trustees in accordance with the process established in 2016 to receive Survivors' reports of sexual misconduct.

g. Respondent 7

Respondent 7 was a horseback riding instructor for Miss Hall's students in the 1990s. Student 32 stated that during her senior year, when she was 17 and 18 years old, Respondent 7 started a sexual relationship with Student 32 that lasted five to six months. Student 32 stated that the sexual encounters took place at Respondent 7's apartment off campus. Student 32 stated that in terms of the sexual activity that occurred, she and Respondent 7 "crossed every boundary two women could cross."

Student 32 stated that she did not report the sexual relationship to any employee at Miss Hall's.

Respondent 7 was unresponsive to the Investigators attempts to contact her for purposes of the investigation. Accordingly, the Investigators were unable to obtain her perspective about the conduct reported by Student 32.

The Investigators were also unable to determine whether Respondent 7 was an employee at Miss Hall's. Student 32 stated that the horse stable was located off campus, but that Respondent 7 was on campus "quite a bit" as well.

Based on the firsthand account received, Investigators determined that a preponderance of evidence supports that Respondent 7 engaged in sexual misconduct toward Student 32.

i. School's Knowledge & Response

Student 32 stated that she did not report the sexual relationship with Respondent 7 to any employee at the school. Miss Hall's did not have any personnel records pertaining to Respondent 7, and the Investigators were unable to obtain any other information regarding Respondent 7's past employment status with Miss Hall's. Given the limited information available, the evidence is insufficient to determine whether Miss Hall's was on notice of Respondent 7's sexual misconduct.

C. Reports of Employee Boundary Violations

Described below are those reports of employees engaging in boundary-crossing behavior that did not entail any conduct of a sexual nature. These behaviors involved interactions that were inappropriate, overly personal, emotionally harmful, and/or inconsistent with professional expectations but did not, based on the information available, amount to sexual misconduct.

a. Respondent 8

Respondent 8 was an employee at Miss Hall's for 30 years beginning in the 1990s.

Aleta Law received numerous third-party and firsthand accounts from alumnae and Miss Hall's employees that Respondent 8 had inappropriate relationships with students consisting of favoritism and boundary transgressions. The majority of reports received stemmed from conduct

alleged to have occurred in the 1990s and 2000s, when alumnae and employees agreed that boundaries between employees and students at Miss Hall's were generally blurred and closeness between students and faculty was encouraged. The Investigators heard from many alumnae that while some other employees held loose boundaries and fostered an inappropriate closeness with students, Respondent 8's behavior was particularly damaging.

Multiple Miss Hall's current and former employees agreed that Respondent 8's favoritism was "blatant," and that Respondent 8 "excluded" students who were not in her "circle." One former employee from the 1990s stated that Respondent 8 would "befriend" kids and give them "perks" and then turn on them, leaving the students "heartbroken." Numerous alumnae and employees agreed that the "perks" included receiving special attention, spending time in Respondent 8's apartment after hours watching movies and TV shows, and getting rides from Respondent 8 off campus to do errands or go to fast food restaurants.

Some alumnae stated that students occasionally fell asleep in Respondent 8's apartment and spent the night there. An alumna from the 2000s who was an on-and-off "favorite" of Respondent 8's during her time at Miss Hall's, stated that she and her friend would "cuddle up" to Respondent 8 under a blanket on Respondent 8's couch. Another former student from the 2000s stated that Respondent 8's apartment door was "always unlocked" and her favorites were given "free rein" to go into her apartment. A former student from the 1990s who was not a favorite of Respondent 8's stated that she never felt like she fit in with her classmates at Miss Hall's due to the "in-crowd versus out-crowd" attitude fostered by Respondent 8.

Aleta Law also received multiple third-party reports that Respondent 8 had an inappropriate, intimate relationship with one student from the 1990s, Student 33. Alumnae reported that Student 33 was a "favorite" of Respondent 8's and was in Respondent 8's apartment "all the time." One alumna stated that she observed Student 33 sitting on Respondent 8's lap and sitting close together on the couch in Respondent 8's apartment with their faces nearly touching as if they had been kissing. Other alumnae stated that Respondent 8 bought a pet guinea pig for Student 33, which she kept in Respondent 8's apartment and the two referred to as their "love child."

Respondent 8 agreed to be interviewed as part of the investigation. During her interview, Respondent 8 acknowledged that she was "close" with Student 33 and with Student 33's family. Respondent 8 stated that Student 33 spoke with her about her personal life, was going through a "rough time," and Respondent 8 sought to support her. Respondent 8 denied that she ever had any romantic feelings for Student 33 or that they ever engaged in any form of sexual activity. Respondent 8 stated that the most she could "imagine" in terms of her physical contact with Student 33 consisted of holding hands. Respondent 8 acknowledged that Student 33 spent time with her in her apartment and that they had a pet together, which Respondent 8 said they could have referred to as their "child," but did not specifically recall doing so.

Respondent 8 stated that she had a conversation about her boundaries with students with two of her colleagues in or around 2006 or 2007, which coincided with a shift in Respondent 8's behavior. Respondent 8 stated that Employee 4 and another colleague raised concerns to her

around this time regarding students' access to her apartment and the differential treatment she afforded them. Respondent 8 stated that her colleagues were "right" about her favoritism, and she began to change her behavior from that point forward.

b. Respondent 9

Respondent 9 was a teacher at Miss Hall's in the 1980s. Aleta Law received a firsthand account from Student 34 that Respondent 9 paid special attention to her and was "very flattering" and "very supportive" of her while she was a student. Student 34 stated that Respondent 9 began "pushing really hard" to go to the movies with her. Student 34 stated that when she rejected his invitation, Respondent 9's attitude toward her immediately changed, and he "threatened" to report her for "plagiarism." Student 34 stated that she reported the situation to a School administrator and was permitted to switch classes so that Respondent 9 was not teaching her anymore. Student 34 stated that at the end of the year, she was informed by then-Head of School Bussey that the School was "revoking" her scholarship, which she believes was in retribution for reporting Respondent 9. Student 34 stated that as a result, she left Miss Hall's and her education was disrupted, resulting in her dropping out of high school. Student 34 stated, and School records confirmed, that she reported her experience to Miss Hall's in 2017, and the School worked with Student 34 so that Student 34 could obtain her high school diploma from Miss Hall's.

The Investigators attempted to contact Respondent 9 for an interview for purposes of the investigation, but he was unresponsive to the Investigators' outreach.

c. Respondent 10

Respondent 10 was a teacher at Miss Hall's in the 2010s. Aleta Law received a firsthand account from Student 35, who stated that Respondent 10 invaded her personal space on multiple occasions, and on one occasion, placed his hands on her hips to pass through a narrow space behind her in the classroom. Aleta Law also received third-party information and reviewed school records indicating that Respondent 10 engaged in other verbal and physical boundary-crossing behavior that led to his dismissal from Miss Hall's.

Aleta Law interviewed Respondent 10, who stated that he did not recall the reported interaction involving Student 35 and that touching a student's hips is "not something" he "would've done." Respondent 10 acknowledged making a regrettable statement to one student and engaging in physical interactions with another student that culminated in his dismissal from the School. With respect to the latter alumna, Respondent 10 stated that the student was "really upset" and stressed with upcoming exams, and in the presence of others, Respondent 10 put his arm around her and tried to comfort her. Respondent 10 further acknowledged that he "knelt down" next to the alumna to help her work through a problem on an exam.

d. Respondent 11

Respondent 11 was an employee at Miss Hall's in the 2010s. Aleta Law received a firsthand report from Student 36, who stated that she had Respondent 11 as her teacher, dorm parent and sports coach while at Miss Hall's. Student 36 stated that she and Respondent 11 became "very close" by her sophomore year and Respondent 11 became more of her "friend" than her teacher. Student 36 stated that she would "hangout" in Respondent 11's campus apartment along with other students, sometimes very late at night. Student 36 stated that while she was in Respondent 11's apartment late at night, she and Respondent 11 "cuddled" on the couch and Respondent 11 "stroked" her cheek and told Student 36 to give her a "massage" on Respondent 11's shoulders. Student 36 stated that she expressed to Respondent 11 that she was "uncomfortable" with the conduct. Student 36 stated that she did not report Respondent 11's conduct to the School until after Respondent 11 left the school.

Aleta Law also received a third-party reported that Respondent 11 spent a lot of time alone with another student, Student 37, and that that they shared a "really strong emotional connection."

When Heaton and administrators learned that Respondent 11 had students in her apartment after hours, they attempted to speak with Respondent 11 and gather additional information about the situation, but Respondent 11 did not agree to meet with them. Heaton stated that it was the end of the academic year, Respondent 11 was already at the end of her contract at that point, and for the limited time left of the school year, Heaton stopped Respondent 11 from interacting with students. Respondent 11 did not return to the School the following year.

Respondent 11 did not respond to the Investigators' attempts to interview her for purposes of the investigation.

D. Unsubstantiated Reports of Employee Sexual Misconduct

Described below are those reports of sexual misconduct that Investigators received during the Investigation but were unable to substantiated by a preponderance of the evidence. As previously noted, finding that a report was unsubstantiated does not mean that the Investigators found that the report lacks credibility. Rather, there was a lack of firsthand and/or corroborating evidence to substantiate the report by a preponderance of the evidence. As noted above, in these instances where the conduct was not substantiated, the Investigators recognize that additional information may come to light after the publication of this report that may support a finding that the conduct occurred as reported.

a. Richard McLain

McLain was the Head of School at Miss Hall's in the late 1960s. The Investigators received multiple third-party reports that McLain was rumored to have had an inappropriate sexual relationship with a student while serving as Head of School and was terminated as a result.

One alumna stated that shortly before her graduation, she saw a group of board of trustees' members walking out of the school with "very grim faces." The alumna stated that she later heard that McLain had been removed from the school for "allegedly having sex" with one of the alumna's classmates.

School records from the time confirm that McLain resigned midway during the year in 1969 from Miss Hall's. In a letter from the Chair of the Board of Trustees to the Board, announcing McLain's resignation, the Chair wrote that the decision should "come as no surprise" because McLain had been "considering this action for several months." The Chair further noted that the Executive Committee unanimously concluded that McLain's resignation was in the best interest of both Miss Hall's School and McLain. Further, the records contain a letter submitted by dozens of students to the Board of Trustees, following the announcement of McLain's resignation, expressing confidence in McLain's leadership and concern over his resignation.

Beyond what is mentioned, the School's records do not contain any details regarding the events leading to McLain's resignation or whether he was asked to resign, including for any alleged sexual misconduct.

b. Respondent 12

Respondent 12 was a faculty member in the late 1970s/early 1980s. The Investigators received third-party information that Respondent 12 was rumored to have had an inappropriate, sexual relationship with a student and was terminated as a result. One alumna stated that she heard "rumors" that Respondent 12 and a senior student were having an "affair." Another employee stated that she heard from an alumna that Respondent 12 was fired after the former Head of School Bussey found him engaging in sexual activity with a student.

School records from the time note that Respondent 12 was asked to resign from Miss Hall's due to "unprofessional conduct." School records further state, in conjunction with Respondent 12's resignation, that a senior student was sent home for the remainder of the year. The records do not contain details regarding the nature of the conduct, nor do they identify the student involved.

c. Respondent 13

Respondent 13 was a teacher in the 1990s. Investigators received third-party reports from alumnae that Respondent 13 had an inappropriate relationship with a student. One alumna stated that Respondent 13 had "inappropriate boundaries" with students. Another alumna stated that Respondent 13 "had a group of followers who were openly gay or curious" that would "hang out" in Respondent 13's apartment. The alumna stated that Respondent 13 "went on to date" one of the students.

Miss Hall's did not have any personnel records pertaining to Respondent 13.

XII. CONCLUSION

This report reflects a painful but necessary reckoning with past instances of sexual misconduct within the Miss Hall's community. The Investigators wish to express deep gratitude to the Survivors and the many current and former students, faculty, staff, and families who engaged thoughtfully throughout this process. Their participation has been vital in helping Miss Hall's to understand the harm that occurred and guiding the School's efforts to create a safer, more accountable environment. Their participation has also been critical in fostering a fuller understanding of the School's culture, both past and present.

Throughout Aleta Law's investigation, the School has voiced its commitment to learn from its past experiences and to strengthen the systems that support prevention and response to sexual misconduct. While the findings in this report are difficult, they represent an essential step toward accountability, institutional change, and healing.

Investigators recognize that additional information may continue to come forward, and any community member who wishes to make a report or share pertinent information regarding sexual misconduct at Miss Hall's is encouraged to contact Aleta Law.