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Michael J. Connolly
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December 19, 2020

Via Email Only

Deputy Attorney General Jane E. Young
NH Department of Justice
33 Capitol Street
Concord, NH 03301
Jane.Young@doj.nh.gov

Re: St. Paul's School

Dear Jane:

Thank you for your letter dated December 17, 2020.

As we discussed during our telephone conversation the evening of December 16, 2020, St. Paul's School will address the concerns raised during our meeting with Attorney General MacDonald, Senior Assistant Attorney General Ward and you on December 16, as well as in your December 17 letter.

Your Office requested SPS to propose three qualified candidates for the Compliance Overseer by December 30, 2020. I have enclosed with this correspondence a letter from Rector Giles proposing three qualified candidates, [REDACTED] along with their resumes. SPS is prepared to hire one of the proposed candidates, upon receipt of the Attorney General's approval, in January prior to the return of the students to campus in late January. SPS is also prepared to negotiate a reasonable indemnity arrangement with the new Compliance Overseer, with the assistance of employment law counsel.

In order to ensure that the School will be able to hire the new Overseer in January, we request that your Office provide its position as to the proffered candidates by January 4.

SPS is also prepared to engage a second individual to support the Compliance Overseer. As discussed, SPS will consult with the new Compliance Overseer about the resources that individual needs for support after the Overseer has held the position for a few weeks. SPS will then seek to engage the appropriate person to provide the needed support.

Also at the suggestion of the Attorney General, SPS is prepared to engage RAINN to review the School's policies as they pertain to student safety. Vice Rector Theresa Ferns has already been in contact with the RAINN Consulting Services Program Coordinator Teresa Cal, who has expressed enthusiasm to take on this project for SPS.

See accompanying email exchange between Vice Rector Ferns and Ms. Cal, on December 17 and 18, 2020.

The School has agreed to negotiate an indemnity agreement with the Compliance Overseer, to engage a second person to support the Compliance Overseer, and to engage RAINN to conduct a review of its policies in the spirit of cooperation with your office and without any obligation to do so under the Settlement Agreement. We, respectfully, do not see the need to amend the Settlement Agreement.

We look forward to continuing to work with you and your Office on these important matters.

Sincerely,



Michael J. Connolly
MJC/smc

Cc: Archibald Cox, Jr., President, Board of Trustees
Kathleen C. Giles, Rector

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