

**ATTORNEY GENERAL  
DEPARTMENT OF JUSTICE**

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GORDON J. MACDONALD  
ATTORNEY GENERAL



JANE E. YOUNG  
DEPUTY ATTORNEY GENERAL

January 12, 2021

*Sent via electronic mail ( [REDACTED] )  
And regular U.S. Mail*

Donald E. Sullivan  
[REDACTED]

**Re: St. Paul's School Compliance Overseer Position**

Dear Mr. Sullivan:

I write to follow-up on our conversation on January 11, 2021. As we discussed, you have been selected to serve as the new Independent Compliance Overseer for St. Paul's School. Your skill, dedication, and extensive experience during the course of your law enforcement career with the victim-centered, trauma-informed enforcement, investigation, and prosecution of sexual assault and domestic violence cases has prepared you well for this role. While I am aware that you have already reviewed these documents extensively, I have enclosed for your reference the Settlement Agreement ("Agreement") reached between this Office and St. Paul's School, as well as Appendix A ("Appendix") to the Agreement, which collectively set forth the duties and responsibilities of the Compliance Overseer.

Of note, the Agreement calls for an advocate from the Crisis Center of Central New Hampshire ("CCCNH") to be on campus at St. Paul's School. See Agreement at ¶ 19. While discussions have occurred about accomplishing this requirement of the Agreement, those discussions ceased with the Independent Compliance Overseer vacancy. One of your first priorities as the Independent Compliance Overseer will be to engage CCCNH Director Jennifer Pierson and St. Paul's School to ensure that this critical component of the Agreement is fulfilled.

In addition to these documents, and as we have discussed, St. Paul's School has recently agreed to the following additional terms:

- (1) A second person will be hired under the same terms as the Independent Compliance Overseer to serve in support of the Independent Compliance Overseer;
- (2) The Independent Compliance Overseer and the additional person will be indemnified by St. Paul's School for any actions taken in their official capacity; and

Mr. Donald E. Sullivan

Re: St. Paul's School Compliance Overseer Position

January 12, 2021

Page 2 of 2

(3) St. Paul's School will engage RAINN (the Rape, Abuse & Incest National Network) to complete a comprehensive program assessment of the policies and procedures at St. Paul's School as they pertain to student safety.

As the Independent Compliance Overseer your input will be critical in identifying the role of the second person who will serve to support you and the mission of the Independent Compliance Overseer. As well, where the Agreement calls for your review and revision of St. Paul's School's policies and procedures, your engagement with RAINN and their program assessment will be essential to identifying necessary improvements and enhancements to the full panoply of safety and well-being measures for students at St. Paul's School.

Finally, as we have discussed, your role as the Independent Compliance Overseer will require that you are in regular contact with this Office. *See e.g.*, Appendix at ¶ 6. With that in mind, your contacts at this Office are Criminal Bureau Chief Geoffrey W.R. Ward and me. Our contact information is below:

Jane E. Young, Deputy Attorney General

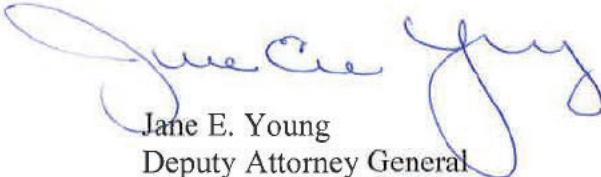
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Geoffrey W.R. Ward, Chief, Criminal Justice Bureau

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Thank you for your willingness to serve in this position and your dedication to safeguarding the well-being of the students at St. Paul's School. I am confident that your tenure as the Independent Compliance Overseer will be successful and will serve to further enhance the efforts made to date to ensure student safety is the top priority at St. Paul's School.

Sincerely,



Jane E. Young  
Deputy Attorney General

GWW/gww  
Enclosures

Cc. Michael J. Connolly, Esquire  
Geoffrey W.R. Ward, Senior Assistant Attorney General

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