

January 23, 2025

TO: MEMBERS OF THE BOARD OF TRUSTEES OF THE LATIN SCHOOL OF CHICAGO

Dear Trustees:

We write on behalf of Members of the Latin School of Chicago (the “School” or “Latin”) to express concerns that certain current and past officers and trustees of the School have persistently failed to discharge their fiduciary duties, resulting in serious physical and mental harm to students and causing possibly irreversible harm to the reputation and financial sustainability of this once highly-respected institution. These officers and trustees have failed to apprise themselves of and address serious and recurring issues within the School—including instances of physical and psychological bullying, discrimination, harassment, administrative and faculty misconduct, and failures of parental notification. These issues are pervasive and persistent, and stem from a fundamentally broken oversight and governance structure. These officers and trustees have not only failed in their duty to protect individual students; they have failed in their duty to the School as an entity and to protect and further the School’s charitable mission. Because of their dereliction of duties, students have been harmed and the School has suffered damage to its educational standing and reputation, and has seen a material decrease in both enrollment and donor-based revenue.

As you know, officers and directors (*i.e.*, trustees) have fiduciary duties to non-profit educational institutions like Latin under Illinois law in the exact same way that officers and directors of for-profit public companies have to those institutions and their shareholders. As discussed further below, these duties include the duties of care, loyalty, and obedience. Latin’s trustees and officers have violated these most basic duties.

As outlined below, there are a series of troubling issues that the Board has failed to address. The purpose of this letter is to demand that the Board confirm and demonstrate whether there is a non-conflicted majority of trustees who are potentially capable of addressing the serious misconduct and breaches of fiduciary duties that have been allowed to go unchecked at the School for a number of years, including by authorizing a full and transparent internal investigation by an independent firm not associated in any way with the School or any of its trustees. We believe, based on the information we have gathered, that such an independent investigation will reveal that Latin leadership engaged in extensive wrongdoing, and will further demonstrate what the Members already know to be true: that the Board should have removed (or taken legal action against) these wrongdoing officers and trustees long ago. Addressing the misconduct of these officers and trustees is vital to the health and welfare of the students enrolled in the School, as well as the School’s reputation and long-term financial health.

Such an investigation, however, can only possibly be effective, complete, and independent if a majority of the current members of the Board are not implicated in the wrongdoing—the full extent of which is unknown to the Members. To that end, we outline below the history of some of the misconduct already known to us at the most senior levels of the School so that the Board may assess which of its members, if any, are potentially unconflicted.

To be clear, the purpose of this letter is to ensure that the School protects its students and their families going forward, which requires understanding and taking responsibility for the misdeeds of the past. Our clients care deeply about Latin. They include Members with generational connections to Latin, are Latin alumni, have multiple family members who attended Latin in recent years, and rely upon Latin’s leadership to govern the School. They would like nothing more than for Latin to be restored to its former respectability. And as the Board considers the information in this letter, we would welcome the opportunity to speak with you and to provide any additional information that would be helpful in your consideration of these most serious issues. We also welcome any current trustees or other members to contact us directly with questions.

## **Examples of Student Bullying, Discrimination, and Harassment**<sup>1</sup>

The Members<sup>2</sup> involved here are a group of parents who share common concerns about the School and its future, including the School’s approach to issues of bullying, discrimination, and parental notification procedures. Some of the Members’ children have been victims of bullying, and others have not. While their individual histories with the School have been varied, a number of common themes run through their experiences, as well as those of many other Members and their children at the School. All of these stories are known or should be known to the Board; they collectively help demonstrate the failures of leadership and breaches of duty by Latin’s trustees and officers.

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<sup>1</sup> The facts set out in this letter are supported by our own investigation, including a review of publicly available information, media reports, certain School documents and cooperation from the families that we represent, other families that have shared their concerns, current and/or former employees of the School who are in a position to know how the Board operates, other direct witnesses to the relevant conduct, as well as educational experts. Quotations in this letter reflect verbatim statements that, we are told, were made by the relevant officers or trustees in the course of their jobs at the School.

In this letter, references to “bullying” and “cyberbullying” should be understood to include bullying based on race, gender, religious affiliation, and other protected classes, as well as bullying or harassment (physical or psychological) that has nothing to do with any protected class. *See generally* 105 ILCS 5/27-23.7 (“Bullying on the basis of actual or perceived race, color, religion, sex, national origin, ancestry, physical appearance, socioeconomic status, academic status, pregnancy, parenting status, homelessness, age, marital status, physical or mental disability, military status, sexual orientation, gender-related identity or expression, unfavorable discharge from military service, association with a person or group with one or more of the aforementioned actual or perceived characteristics, or any other distinguishing characteristic is prohibited in all school districts, charter schools, and non-public, non-sectarian elementary and secondary schools”).

<sup>2</sup> As set out in the School’s bylaws, “the following persons shall be Members of the School . . . The parents or guardians who have enrolled their child or children in the School or who have agreed in writing that their child (or children) shall matriculate at the School during the next succeeding school year . . .” Bylaws Article V, Section 1(a). The bylaws also provide that Members shall have voting rights, and that Members “shall elect Trustees.” Bylaws Article VI, Section 6; Article VII, Section 3(a).

By way of example, one Member family has a longstanding relationship with the School, with multiple family members having attended Latin in the past. Despite this longstanding relationship, this family has represented to the Board that they no longer believe that the School is able to protect their child's physical safety. Last year, their child was chased down, cornered, and physically assaulted by a group of seven other children at recess, causing the child to incur visible injuries, including scratches and gouge marks. Multiple adults at the School, including the school nurse, knew about this attack—but no one at the School informed the family about what had occurred. The School also failed to discipline any of the students responsible for the attack and failed to implement any effective changes to prevent such attacks from occurring again. Prior to the May 2024 attack, their child had experienced other instances of bullying by classmates—such as an October 2023 incident in which the child was sent aggressive cyberbullying videos by a classmate, or a December 2023 incident in which the child was punched in the chest by a classmate. In each instance, the School followed its problematic pattern of failing to notify the parents, and failing to rectify the situation or engage with any discipline for the aggressor students. When directly confronted with evidence of these instances, school administrators (including Dr. Hagerman, the Head of School) refused even to acknowledge the assaults had occurred.

As reflected in numerous court filings in ongoing litigation, during the Fall of 2021, another family's child experienced intense and prolonged cyberbullying attacks from classmates, which included messages telling the child he should "kys" (kill yourself), and a multi-student group chat dedicated exclusively to bullying this single student. School personnel ignored critical information known to them—including information actually reported to the School by the student about cyberbullying by multiple Latin students—and failed to do anything to address the situation, including failing to inform the student's parents. Tragically, this student died by suicide following the relentless and unchecked pattern of bullying—and the child's parents did not find out about any of the bullying incidents until after the child's death, through a third party. Worse, when confronted with the facts, the School denied them and/or blamed the student for the bullying. For example, when the School learned that the student had been told to "kys" by another Latin student, it dismissed that fact because there was no documentary proof of the message—totally ignoring the reality that children often delete their messages and/or use auto-deleting platforms like Snapchat. To our knowledge, the School has never conducted an investigation of the circumstances surrounding the bullying of this family's child, it never took appropriate disciplinary actions against the students involved in the cyberbullying, and it never sanctioned or dismissed the Latin personnel who were complicit in these events.

Even the School's own faculty has been involved in acts of bullying and hazing. For example, Bridget Hennessey, a teacher and Latin's current Dean of Students, reportedly engaged in crude sexual conversations with minor Latin students during a School trip and dared the children to lick Nutella off each other. This incident was reported to Latin in June 2020 by a former Latin student who publicly posted details of the incident on the "Survivors of Latin" Instagram account. Despite this unambiguous report of employee misconduct, Hennessey was still retained by Latin, and her subsequent conduct in the Fall of 2021 is the focus of a pending lawsuit brought by the family whose child died by suicide.<sup>3</sup> Yet Hennessey continues to have—with the apparent blessing of the Board—direct authority over children at Latin.

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<sup>3</sup> We are aware that—notwithstanding the facts—certain of the claims filed against the School were dismissed on legal grounds. With respect to Hennessey, however, the court denied her motion to dismiss the willful and wanton breach of duty/voluntary undertaking claim against her.

In addition to severe physical and psychological bullying incidents, the School also has a history of failing to address incidents of bullying expressed through racism and religious discrimination among students. Some examples of the bullying and antisemitic conduct at Latin that has been tolerated by the administration include:

- During the pandemic, students at the School were widely circulating insidious rumors that the School’s Jewish students were responsible for the spread of COVID-19. The School failed to address these rumors or discipline the responsible students, apart from a generalized statement that no one was to blame for the pandemic.
- In 2020 a Latin student created a fake recording that appeared to show a child (specifically, a Jewish student) saying the “N-word”—rumors of the recording were widely circulated around the School, causing this student significant distress. The issue was reported to the School and specifically raised by a trustee at a Board meeting, but Board leadership refused to discuss the incident, claiming that it was not the Board’s place or role to intervene in bullying incidents, and that such matters should be solely dealt with by School teachers and administrators.
- In a separate incident, at a cross-country event during Fall 2022, one student (the same student who was behind the fake N-word recording) yelled at a fellow student, who is Jewish, “run Jew run, there’s money at the end.” That student was understandably upset by this antisemitic bullying and the incident was reported to School officials. Nevertheless, the responsible student faced no disciplinary consequences, and the School failed to adequately address or remedy the situation.
- In May 2024, as recently reported in the *New York Post*, a group of students knowingly played the Nazi anthem during band practice.<sup>4</sup> Many students and parents were deeply distressed by this incident and felt that it was reflective of a systematic pattern of antisemitism at the School. School officials were informed and stated that the incident was being investigated—but it does not appear that any of the students involved were disciplined. To the contrary, one of the responsible students was invited weeks later to serve as a graduation speaker.

These are just examples. There are plenty of other examples of students at the School who have been the victims of discrimination, antisemitism, taunting, bullying, and physical assault. And while we appreciate that some degree of misbehavior amongst children is inevitable, the one overarching and unmistakable theme is that the School has failed to take steps to prevent incidents like these from occurring, has done practically nothing to investigate them after the fact, has imposed no consequences on the responsible parties, has failed to adjust or enforce policies and practices following these incidents, and has chosen to keep parents uninformed about the dangers to their children—either specific dangers to their individual children, or to safety concerns within the School generally.

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<sup>4</sup> See “Antisemitism festers at famed Chicago school—including incident where some band members allegedly played Nazi anthem: parents,” (Nov. 2, 2024), <https://nypost.com/2024/11/02/us-news/antisemitism-festers-at-famed-chicago-school-including-incident-where-some-band-members-allegedly-played-nazi-party-anthem-parents/>.

In addition, the School displays a troubling pattern of manipulating counseling resources as an excuse to fail to take disciplinary action against students responsible for bullying and discrimination, and as an excuse to not accurately inform parents about student conflicts, including any bullying or discrimination incidents involving their children. The School employs several counselors who lack sufficient or proper qualifications and training for this important job. In many cases, a student will talk to a counselor about conduct that constitutes or implicates bullying or discrimination, the counselor will give the student advice (often unhelpful advice), and then the School will leverage this interaction as an excuse to keep information from parents under the guise of counselor confidentiality. Members are left in the dark about the experiences that their children have had and the dangers they face, while the School itself does little to nothing to mitigate the dangers to Latin students or hold the responsible parties accountable when bullying or discrimination does occur. Moreover, we understand that counselors will share confidential student health information learned during student counseling sessions with other teachers and administrators at the School—blatantly disrespecting the very privacy concerns that Latin cites to justify hiding information from parents. One student went so far as to say, “Every single year at latin, at least 2 classmates close to me have seriously considered suicide. I was one of them. You cannot tell me that Latin had no involvement. There was no safe space to go to—Ms. [redacted] was absolutely horrible and offered nothing. I had a friend tell me they’d rather commit suicide than see her.”

### **Breaches of Fiduciary Duties by Officers and Trustees**

The officers and trustee of Latin all owe fiduciary duties to the Members of the School under Illinois law. These duties include the duty of care, the duty of loyalty, and the duty of obedience. Numerous Latin officers and trustees have violated these most basic duties.

The duty of care requires that fiduciaries play an active role in management and oversight of the School and its staff; that they consider all material information reasonably available to them in making business decisions; that they properly inform themselves of material facts necessary to exercising their business judgment; and that they ensure the School continues to comply with all applicable laws and with the organization’s bylaws. The duty of loyalty requires that fiduciaries act in the best interest of the School (rather than out of self-interest); that they disclose actual and potential conflicts of interest or other matters that might affect their independent judgment; and that they not enrich or benefit themselves at the expense of the School. The duty of obedience requires that fiduciaries act at all times in furtherance of the School’s charitable mission and purpose; and act for the benefit of the School’s Members and its students.<sup>5</sup> The unchecked bullying at Latin demonstrates

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<sup>5</sup> Latin describes its mission as follows: “Latin School of Chicago provides its students with a rigorous and innovative educational program in a community that embraces diversity of people, cultures and ideas. Latin inspires its students to pursue their passions and lead lives of purpose and excellence.” <https://www.latinschool.org/about-us/mission-vision-values>. Latin represents that it achieves its mission by “encouraging excellence in all academic and personal pursuits; creating an educational environment that fosters and supports the moral, physical, psychological and aesthetic growth and development of each student; recruiting and retaining excellent faculty and staff; sustaining a diverse, inclusive and multicultural community that affirms and values each individual; attracting dedicated families committed to the mission of the school; promoting programs in all divisions that help our students make connections and become active citizens in our school and city; and developing the financial and physical resources to support the school’s needs.” *Id.*

a violation of each of these fiduciary duties. Most prominently, the officers and trustees either knew about or failed to inform themselves of the material facts about bullying and discrimination at the School and then failed to exercise proper business judgment in addressing those issues known to them.

Based on the information already in our possession, a lengthy list of officers and trustees (set out in Appendix 1 to this letter) engaged in acts and omissions that were damaging to students at the School and damaging to the School itself. These officers and trustees can be divided into two camps: (1) those who possessed actual knowledge of the severe bullying and/or discrimination incidents and knowingly chose not to act—and in some cases, acted to promote or cover up the misconduct; and (2) those who clearly should have known about such incidents but refused to adequately inform themselves—as they were required to do—and thus looked the other way as major incidents occurred and problems persisted at the School.

The former group (which consists of, among others, the Chairs of the Board, Heads of School, and the executive committee) are insiders who consistently withhold information from the latter group (which consists of general trustees who are left with little choice but to rubber-stamp everything the insiders propose), leading to a system of management disconnect and dysfunction. This insider group, we are informed, operates through a policy of withholding from the general trustees “anything you wouldn’t want printed in the newspaper”—thus significantly hampering the ability of the trustees to exercise oversight, evaluate performance, and effectuate change.

The people at the top—Latin’s Heads of School and Board Chairs—bear the most responsibility for creating the atmosphere that allows bullying to continue unchecked while other trustees (not to mention the Members) are left in the dark. The following are representative—and by no means exhaustive—examples of specific breaches of fiduciary duties by the School’s most senior officers and trustees:

**Randall Dunn** exhibited a failure of leadership and disregard of his fiduciary duties and the law, and exhibited a pattern of ignoring or burying many incidents of misconduct that were brought to his attention. His failure of leadership is demonstrated by the fact that the Board gave Dunn a vote of no confidence in 2016, although Dunn was retained as head of school for another six years and received underserved pay raises and bonuses. Dunn perpetuated an organizational culture whereby staff were pressured not to inform parents about issues their children were facing at school, in an attempt to “keep quiet” such issues to avoid impacting the School’s image. For example, in 2018, Dunn terminated a senior administrator at the School shortly after that administrator had suggested reporting a student’s sexual assault to the parents or to the police; Dunn told the administrator to stay out of the matter. One former Latin staff member went so far as to state that Dunn was largely responsible for the “many systematic issues the school has suffered” and that Dunn “has destroyed the soul of that school.” Dunn’s failure of oversight has led to rampant bullying at the School because misbehaving students quickly learned that they would rarely face consequences for their cruel actions against their peers.

**Dr. Thomas Hagerman’s** job history features controversies and poor management, yet Latin’s trustees hired Hagerman anyway and continue to pay him a handsome salary. Immediately prior to becoming Latin’s Head of School in 2022, Hagerman served as the Superintendent of Scarsdale Public Schools in New York and was forced to resign from his position after the Scarsdale Board learned that Dr. Hagerman had “covered up for close to a year the imposition of \$1.7 million

in fines by the IRS for payroll withholding tax errors.”<sup>6</sup> Had Latin’s officers and trustees exercised proper due diligence, they would have known that Hagerman failed to disclose this misconduct during his interview process. After being hired but before his start date, Latin did learn that Hagerman had hidden the mounting IRS penalties from his previous employer and, nonetheless, the trustees and officers failed to revoke Hagerman’s offer of employment and allowed him the chance to explain the scandal to the Latin community. In his explanation, Hagerman lied about his role and his failure to apprise the Scarsdale School Board: “he excerpted comments from Scarsdale Board of Education President Karen Ceske, but misrepresented her statements by omitting three paragraphs and adding some wording of his own.”<sup>7</sup> When the Scarsdale School Board learned of that lie, the president of the Scarsdale Board issued a public statement identifying Hagerman’s falsehoods, but Hagerman doubled down and pressured a Latin employee (whose children were students at Latin) to take the blame for Hagerman’s own misrepresentations. The details of Hagerman’s misconduct were publicly aired in newspapers circulated from New York to Chicago and in legal filings. Hagerman thus brought his bad actions and corresponding bad press to Latin, negatively affecting the School’s reputation and demonstrating that despite Randall Dunn being gone, Latin’s dysfunction continued. Since joining Latin, Hagerman’s time has been characterized by mismanagement, lack of transparency, lack of communication with parents, teachers, administrators and trustees, and a knowing failure to follow Latin’s policies and procedures concerning reported incidents of cyberbullying, bullying, harassment, discrimination and antisemitism.

**David Koo** breached his duties to Latin in multiple ways, most notably by breaching his duty of loyalty to Latin by putting his own self-interest and the interest of his own family ahead of the best interest of the School and the Latin students. Koo served as Chair of Latin’s Board of Trustees while suffering critical conflicts of interest that rendered him unable to exercise appropriate oversight or make fair and impartial decisions regarding bullying and discrimination at the School. The fact that Koo’s children were enrolled at the School while Koo served as chairman of Latin’s Board was itself a conflict of interest, because it put Koo in the position of having to weigh the interests of his own children against the interests of other children at the School. For this very reason, the National Association of Independent Schools has issued formal guidance recommending that school governing boards “should appoint chairs who do not have children who are currently enrolled in the school,” so that the chair can “lead and make decisions without raising questions about possible conflicts that might affect their own children.”<sup>8</sup> For the same reason, Koo’s personal conflicts of interest prevented him from discharging his duties to protect Latin and the student body at large. For example, Koo and his wife maintained close personal relationships with the families of the children who bullied the

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<sup>6</sup> “Scarsdale schools superintendent resigns amid probe into IRS fines cover-up,” (May 7, 2022), <https://westchester.news12.com/scarsdale-schools-superintendent-resigns-amid-probe-into-irs-fines-cover-up>; “Concerns About Scarsdale’s Tax Issue Reach Chicago” (April 21, 2022), <https://scarsdale10583.com/section-table/29-around-town/9541-concerns-about-scarsdale-s-tax-issue-reach-chicago>.

<sup>7</sup> “Hagerman Resigns Again Under the Cloud of an Investigation,” (May 6, 2022), <https://scarsdale10583.com/section-table/98-on-the-market/9585-superintendent-hagerman-resigns-again-saying-the-irs-matter-has-become-a-major-distraction>.

<sup>8</sup> See *The Board Chair Handbook, an essential Guide for Board Leaders at Independent Schools*, NAIS Trustee Series, John Creeden, (2019), at 59.

student who died by suicide, with these families vacationing together and visiting each other's homes. Despite this clear conflict of interest, Koo did not disclose his relationship with those families to the rest of the Board, and did not recuse himself from decisions relating to the bullying of this child or any discipline of the children responsible. To the contrary, he inserted himself personally into decisions and public statements about the matter. Koo also failed to direct any investigation into these serious bullying reports.

Even the State of Illinois has recognized the pervasive problems at Latin. While Dunn and Koo were in their positions as fiduciaries of Latin, the Board received a notice from the Illinois State Board of Education informing the Board that the School's anti-bullying policy was not in compliance with the Illinois Bullying Prevention Act and that corrective measures were required. Dunn and Koo eventually promulgated an anti-bullying policy in an attempt to appear to comply with the Act—but neither Dunn nor Koo, nor anyone else in a position to do so, took any actions to ensure that these policies were actually implemented and followed. Later, during the 2023 school year (during Dr. Hagerman's time as Head of School and **Robert Chapman**'s tenure as Chair), it was revealed that Latin had reverted to its prior, original bullying policy that the Illinois State Board of Education had previously instructed was not compliant with state law.

### **The Trustees Knew About—or Recklessly Failed to Inform Themselves of—the Widespread Bullying and Discrimination at Latin**

Members have uniformly shared concerns about the longstanding patterns of discrimination and bullying at Latin. There are numerous indications that Latin trustees knew (or should have known) about just how widespread bullying and discrimination of all kinds had become at the School during their tenure. For example, an independent study conducted by the School's student newspaper showed that 92% of students reported experiencing bullying while at Latin. Beginning in 2020, the public Instagram account "Survivors of Latin" (which has over 2,700 followers) showcased hundreds of bullying experiences from current and former students at the School. Multiple posters (some anonymous, some not) stated that they had suffered mental health crises and seriously considered suicide as a direct result of the bullying and harassment they suffered at Latin.<sup>9</sup> The "Survivors of Latin" account has been making such posts publicly for more than four years. At the very least, the trustees were certainly on notice of these issues in April 2022, when one of the families described above filed a lawsuit against the School describing them in depth.

While some trustees have occasionally tried to raise these important concerns during Board meetings, such inquiries are quickly shut down. For instance, during one Board meeting, a trustee raised a student harassment issue involving antisemitism, but the trustee was told that specific student issues cannot be brought up at Board meetings. Not only was that statement entirely false—there is no basis in law and no good reason why specific student bullying incidents cannot be discussed

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<sup>9</sup> A selection of screenshots of these "Survivors of Latin" posts are attached to this letter as Exhibit A. *See also* "The Administration's Reaction to the Survivors of Latin" (June 26, 2020) <https://readtheforum.org/16252/racial-inequality-at-latin/the-administrations-reaction-to-the-survivors-of-latin/>.



amongst the Board—but the Board can only properly exercise its fiduciary obligations if it is apprised of serious incidents that occur at the School.<sup>10</sup>

It is also worth noting that the majority of the trustees are themselves parents of children at the School, or formerly had children enrolled at the School. As parents, they have a general awareness of significant issues and developments that occur at the School. Yet these parent-trustees face a clear conflict of interest and/or lack of independence. Given that the School retains the ability to terminate their children’s enrollment at any time, for any reason, and those children are otherwise under the daily supervision of School administrators, such parent-trustees are understandably hesitant to voice any real criticisms about the School’s decisions, policies, and administration. In effect, this structure results in a coercive and improper balance of power between the parent-trustees and the school administrators. Filling the Board with such parent-trustees—especially when coupled with the practice of the insiders not to apprise the general trustees of important information—allows the School to perpetually insulate itself from any real oversight, opposition, change, or progress.<sup>11</sup>

### **The Trustees’ Breaches have Directly Harmed the School and its Members**

The breaches of duty, acts, and omissions of these officials have caused real, measurable loss to the School—not only in the form of tragic loss of life, or physical and psychological injuries from bullying, or the shame and ridicule suffered by the victims of discrimination—but also to the School’s reputation and educational standing as an institution. Latin is no longer the premier educational institution it once was. The actions described above resulted in a decrease in applicants and enrollment numbers, a decrease in donation-based revenue, and significant harm to the School’s reputation. The numerous news articles about Latin published around the country in recent years are near-universally negative in nature and critical of the school’s actions.<sup>12</sup> Until very recently, the very first results that

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<sup>10</sup> See, e.g., *The Trustee’s Guide to Fiduciary Responsibilities*, NAIS Trustee Series, David E. Ormstedt and Debra P. Wilson, (2016), at 12 (“Where issues of child safety and wellbeing are concerned, boards must remain aware of the risks and strengths of a school’s programs and stay well-informed about any issues that arise.”).

<sup>11</sup> The trustees have also regularly violated Latin’s bylaws concerning their own selection, exacerbating many of the issues discussed in this letter. The School’s bylaws require that “Members of the School are eligible to vote for elected Trustees,” that “the Members of the School shall meet at least annually to elect Trustees,” and that “the election of Trustees in any year may be conducted by mail or electronic communications.” Bylaws, Article V, Section 1; Article VI, Sections 2 and 6. The School has violated this provision because it appears that, for at least the past several years, the School has not been adequately informing Members about their voting rights or regularly distributing voting materials to Members. This lack of accountability to the Members has further exacerbated the poor decision-making of the officers and trustees.

<sup>12</sup> See, e.g., “Students and Alums Reveal Racist Culture at Top Chicago Private School,” (July 2, 2020) <https://blockclubchicago.org/2020/07/01/students-and-alums-reveal-racist-culture-at-top-chicago-private-school/>; “Bullied to death: Chicago’s most elite private school accused of contributing to student’s death, cover-up afterwards,” (June 6, 2022), <https://www.meyers-flowers.com/our-firm/news-room/bullied-to-death-chicago-s-most-elite-private-school-accused-of-contributing-to-s/>; “A 15-year-old boy died by suicide after relentless cyberbullying, and his parents

appeared on a Google search for “Latin School of Chicago reputation” stated that the school “has a mixed reputation,” that many believe “the school fails to live up to its reputation, and that it has a toxic culture that’s subsumed by white and class privilege,” and that social media posts have “shared hundreds of stories from current and former students accusing the school of racism, xenophobia, and abuse.”<sup>13</sup>

Moreover, we have been made aware of multiple longstanding donors who stopped giving to the School due to its persistent mismanagement of bullying and discrimination issues. Attendance numbers have decreased in recent years as families either pull out their students, or decline to enroll or re-enroll their students, due to these issues. A review of Latin’s financial disclosures from 2013 to 2024 shows a steady, significant decline in financial health, with revenues over this 12-year period increasing 20% while expenses increased nearly 55%. As a comparative baseline, during this same period, U.S. core inflation has been 36%, meaning that Latin’s revenues actually declined on a constant dollar basis. Further, from 2013 to 2018, the School had an average annual surplus of over \$5.0 million, whereas from 2019 to 2024 the School averaged a deficit of approximately \$1.6 million. This result is undoubtedly exacerbated by a precipitous decline in philanthropic support, which averaged nearly \$10 million from 2013 to 2018, but which is less than half that amount today. In fact, adjusted for inflation, 2024 contributions have declined by 72% from 2013.

Further, Latin’s financial statements show its real estate holdings valued at approximately \$69 million, yet Latin is aware of significant deferred capital expenditures across its aging facilities. The School has identified tens of millions of dollars of needs with no plan or reserve to actually pay for them—nor even a disclosure to its Members of this very concerning deficiency. Despite this weakening financial position, the School continues to take on debt to acquire nearby land and significantly increase payroll (with salaries and wages up 55% since 2012 and executive compensation up 64%), while rapidly increasing spending on legal fees and public relations firms to deal with growing scandals and legal problems.

In addition, the School’s repeated failures to address racism and antisemitism also have the potential to jeopardize its IRS 501(c)(3) tax-exempt status, which would have devastating financial consequences to Latin. Each year, to maintain its federal tax-exempt status, Latin makes a number of mandatory filings with the IRS, including Form 5578, the “Annual Certification of Racial Nondiscrimination for a Private School Exempt from Federal Income Tax.” This form requires that

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say the Latin School could have done more to stop it,” (April 25, 2022)

<https://www.cbsnews.com/chicago/news/15-year-old-boy-cyberbullying-suicide-latin-school-chicago-lawsuit/>; “Chicago’s Latin School refuses parents’ request for records of son who died by suicide after bullying, new lawsuit says,” (June 28, 2023)

[https://www.gmtoday.com/news/illinois/chicagos-latin-school-refuses-parents-request-for-records-of-son-who-died-by-suicide-after/article\\_974e6edc-15c4-11ee-a61f-4f7a964370e9.html](https://www.gmtoday.com/news/illinois/chicagos-latin-school-refuses-parents-request-for-records-of-son-who-died-by-suicide-after/article_974e6edc-15c4-11ee-a61f-4f7a964370e9.html); “Latin School of Chicago Named in Yet Another Lawsuit,” (July 18, 2023)

<https://www.chicagocontrarian.com/blog/latin-school-of-chicago-named-another-lawsuit/>;

“Antisemitism festers at famed Chicago school—including incident where some band members allegedly played Nazi anthem: parents,” (Nov. 2, 2024), <https://nypost.com/2024/11/02/us-news/antisemitism-festers-at-famed-chicago-school-including-incident-where-some-band-members-allegedly-played-nazi-party-anthem-parents/>.

<sup>13</sup> See Exhibit B.

the School certify, under penalty of perjury, that “the school does not discriminate on the basis of race in the administration of its educational policies, admissions policies, scholarship and loan programs, or other school-administrated programs.”<sup>14</sup> Latin’s continued failure to prevent and address widespread racism and antisemitism thus endangers its very ability to continue operating as a tax-exempt enterprise—a status which is crucial for its survival as a private, donor-funded institution.<sup>15</sup>

## Demand

The trustees’ failure to initiate an independent and transparent investigation into these matters, as well as the trustees’ failure to remove or take legal action against the wrongdoing officers and trustees listed in Appendix 1, constitute willful violations of the business judgment rule, because, among other failures, both stemmed from the Board’s failure to obtain and consider sufficient information. Further, these failures demonstrate the very real conflicts of interest under which the current Board labors.

The Members accordingly demand that, in the first instance, the Board demonstrate that there is a majority of unconflicted trustees who are capable of authorizing a full and transparent independent internal investigation of this wrongful conduct and harm to the School and its students. We are skeptical that such an unconflicted majority exists, given the pervasive and long-standing problems identified in this letter—problems that have likely touched individual trustees and their families (including their Latin students) in ways that we do not yet know. Nonetheless, we are open to receiving information about whether there is an unconflicted majority capable of taking much-needed action. If there is, the Board (acting through a special committee comprised of unconflicted trustees) should promptly order an internal investigation (the “Investigation”), which should abide by the following terms:

1. The School should engage an independent firm (the “Firm”) which is mutually selected by the Members and the School. The Firm selected should have experience evaluating issues of non-profit governance, school operation and administration, student misconduct, and classroom dynamics, including discrimination, bullying and cyberbullying in school settings, and ideally should have experience applying the Illinois Bullying Prevention Law and other laws and regulations to which Latin is subject.
2. The chosen Firm should be fully independent and not have prior links or affiliations to the School in any way.
3. The Investigation should include an environmental review of the School’s culture, atmosphere, policies, and procedures with an aim of identifying the extent and severity of bullying, cyberbullying, discrimination, and harassment among the student populace. This

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<sup>14</sup> See “Form 5578,” <https://www.irs.gov/pub/irs-prior/f5578--1984.pdf>.

<sup>15</sup> This is not the only potential misrepresentation that the School has made to the IRS. Latin’s Form 990, for example, reports that each of the members of the Board’s executive committee spends ten hours per week, or 520 hours per year, exercising their fiduciary oversight of the School. The same form represents that the general trustees are devoting two hours per week, or 104 hours per year, to the job. Given what we know about the way the Board operates, we are skeptical of these figures.

should include an anonymous survey of current and past students and parents, employees, and trustees, designed to address the effectiveness and application of the School's bullying policies.

4. The Investigation should include a comprehensive review of Latin's governance, including its governance structure, governing documents, Board manual, trustee selection process, trustee training, existing committees, and overall Board operations. The Investigation should inquire into the creation of additional committees or subcommittees of the Board, for example to specifically monitor and address issues of discrimination, antisemitism, bullying, cyberbullying, and harassment. The Investigation should also evaluate the need for broad reformulation of the Board to comply with standard corporate and non-profit governance principles, including whether it would be appropriate to:
  - a. Reconstitute the current Board so that a majority of voting trustees are not current parents and/or mandate that a majority of trustees may not be current parents;
  - b. Prohibit parents from serving as Board chair;
  - c. Set term limits and remove entrenched trustees;
  - d. Right-size the Board to 20 trustees or fewer;
  - e. Hold annual meetings for all Members;
  - f. Make the School's bylaws and other organizational documents readily available to Members and stakeholders;
  - g. Ensure Members are provided a timely and convenient means to nominate a slate and elect trustees of their choice; and
  - h. Grant Members the right to ratify any changes to governing documents.
5. The Investigation should include a comprehensive review of Latin's established rules, policies, and procedures, including Latin's Employee Handbook, Student and Family Handbook, Conflict of Interest Statement, Whistleblower Protection Policy, and Student Enrollment Contract.
6. The Investigation should also include an assessment of the strengths and weaknesses of the School's existing written policies for bullying and harassment, and discrimination of any kind, and an assessment of how effectively those written policies are actually being employed and enforced in practice. Specifically, the Investigation should focus on the effectiveness of the School's policies and practices in the following areas:
  - a. Identifying and defining incidents of bullying, both in-person and online;
  - b. Protecting students who report bullying from retaliation;
  - c. Using the Incidents of Bias protocol to report bullying;
  - d. Reporting bullying incidents to parents;
  - e. Reporting bullying incidents to regulators or law enforcement, when appropriate;
  - f. Compliance with the Illinois Bullying Prevention Law;
  - g. The adequacy and effectiveness of the School's student counseling/mental health resources vis-à-vis identifying and preventing bullying and the impact that bullying has on student mental health;
  - h. Training for faculty, staff, and trustees on compliance with the School's policies and legal obligations regarding bullying;

- i. Training specifically for teachers, focused on dealing with bullying in the classroom, effective de-escalation techniques, and knowing when bullying must be reported;
  - j. Training for students on bullying prevention and reporting; and
  - k. Proper discipline and corrective action for students who engage in bullying.
7. The Board should require that all current trustees, executives, agents, and employees of the School cooperate completely with the Investigation.
8. The Firm should present its findings in a detailed, formal written report (the “Report”), which will include both the findings of the Firm’s investigation and its concrete recommendations.
9. No one affiliated with either the School or the Members may be privy to a draft or preview in any form of the findings or recommendations in the Report before it is made simultaneously available to counsel for the School and the Members. That is, the Report must be entirely the work of the Firm, uninfluenced by anyone.
10. Once delivered to counsel for the School and the Members, they may review the Report to suggest any appropriate redactions, solely for the purpose of protecting the privacy of individual students. Thereafter, for a period of at least two years, the redacted Report should be made available on Latin’s public website and given to all parents of prospective students during the admissions process, before they are required to commit to registering with the School.
11. Once the Investigation concludes, the School must make a concerted, good faith effort to effectuate the Report’s recommendations. This obligation includes, if necessary, self-reporting violations of state and federal regulations to the appropriate agencies and issuing corrective disclosures; restating any inaccurate or misrepresented financial information concerning Latin; notifying parents of prior instances of misconduct or bullying involving their children; and conducting new disciplinary proceedings for prior unaddressed instances of student or faculty misconduct. Depending on the Report’s recommendations, we expect that the School may also be required to make certain personnel changes, including, for example, removal of certain trustees or faculty.
12. For a period of one year after the Report is issued, the School’s enactment of its recommendations should be overseen by an independent monitor (the “Monitor”) who has expertise in school administration, and whose identity is mutually acceptable to the School and the Members. (In the absence of agreement, the Firm should select an appropriate Monitor—or, if both parties agree, someone affiliated with the Firm itself may serve as the Monitor). The Monitor should periodically review the School’s progress under the Report and enactment of the new policies and recommendations for at least one complete academic year following issuance of the Report, and the Monitor should issue written updates to the Members and the School every three months. At the end of one year, the Monitor should issue a thorough and detailed supplemental report evaluating the School’s efforts to incorporate the new policies, procedures, and recommendations. This supplemental report should also be reviewed and made publicly available consistent with the procedures described in paragraph 10, above.

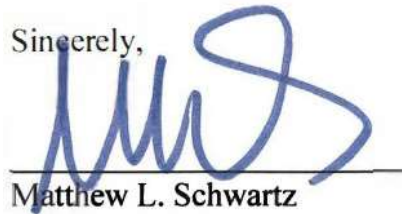
13. Should the supplemental report determine that the School continues to be deficient, the School and Members will discuss further remedial steps, and the Members reserve the right to take legal action to redress such deficiencies—but we are hopeful that will not be necessary, and that the current trustees will take their responsibilities seriously in light of the findings in the Report.

As an initial step, we must understand whether there exists an unconflicted majority of the Board capable of commissioning this sort of Investigation and acting upon the resulting Report, because a conflicted investigation and response would only further ossify and validate the culture of bullying and misconduct that has infected the School. We therefore ask that, by February 13, 2025, the School demonstrate to the Members' satisfaction that there is such an unconflicted majority capable of and willing to commission the Investigation and follow through with the recommendations that will follow. Should the School fail to do so, then the Members will proceed with the only other avenue for relief available to them: commencing a lawsuit to address the misconduct outlined in this letter.

\* \* \*

Again, as the Board considers the very serious issues raised in this letter, we are available to provide whatever additional information would be useful to its consideration.

Sincerely,



Matthew L. Schwartz

## Appendix 1

### **Trustees and Officers Who Violated Their Fiduciary Duties to the School**

1. Abigail Johnson-Reid Phelps – trustee from 2023 to present.
2. Alejandro Longoria – trustee from 2022 to present.
3. Alexander Abell – trustee from 2023 to present.
4. Andres Mendoza Pena – trustee from 2023 to present.
5. Beth Goldberg-Heller – trustee from 2019 to 2022.
6. Bliss Tobin – Lower School Director from 2021 to present.
7. Bridget Coughlin – trustee from 2020 to 2024.
8. Bridget Hennessy – current 9<sup>th</sup> and 10<sup>th</sup> Grade Dean of Students.
9. Carrie Parr – trustee from 2022 to present, current Vice Chair.
10. Charlie Tribbett – trustee from 2022 to present.
11. Christopher Keogh – trustee from 2022 to present.
12. Colleen Batcheler – trustee from 2019 to present.
13. Daione Mitchell – trustee from 2022 to 2024.
14. Dara Milner – trustee from 2019 to present, current Chair, former Vice Chair.
15. Darren Snyder – trustee from 2020 to present, current Treasurer.
16. David Koo – trustee from 2019 to 2022, former Chair.
17. David Williams – trustee from 2019 to 2023, former Secretary.
18. Deb Sampey – Middle School Director from 1995 to 2023.
19. Denise Fogus Gibson – trustee from 2019 to 2024.
20. Diane Saltoun – trustee from 2016 to present.
21. Donald Lassere – trustee from 2023 to present.
22. Dontrey Britt-Hart – trustee from 2020 to 2023.
23. Edward Benford – trustee from 2016 to present.
24. Elizabeth Betten – trustee from 2020 to 2022.
25. Elizabeth Mihas – trustee from 2019 to 2022.
26. Erin Amico Wegscheider – trustee from 2023 to present.
27. Georgy Ann Peluchiwski – trustee from 2016 to 2019, former Chair.
28. Gurpreet Singh – trustee from 2022 to present.
29. Jeff Sharp – trustee from 2022 to present.
30. Jennifer Cizner – trustee from 2019 to present.
31. Jennifer Peoples – trustee from 2022 to present.
32. Jennifer Prewitt – trustee from 2019 to 2022.
33. Jonathan Berger – trustee from 2019 to 2022.
34. Jyoti Patel – trustee from 2019 to present.
35. Kristine Von Ogden – Upper School Director from 2021 to 2023.
36. Lina Wei – trustee from 2022 to present.
37. Maury Tognarelli – trustee from 2016 to present.
38. Meredith Bluhm-Wolf – trustee from 2019 to 2022.
39. Michael Szczepanek – Chief Financial Officer from 2019 to present.
40. Nancy Dwyer – trustee from 2020 to 2022.
41. Nick Baer – Upper School Director from 2023 to present.
42. Nicole Mann – trustee from 2019 to 2024.
43. Nils Larsen – trustee from 2023 to present.
44. Olumide Ajiginni – trustee from 2022 to present.



45. Paul Furlow – trustee from 2019 to 2023.
46. Peter Jackson – trustee from 2020 to present.
47. Rafael Santana – trustee from 2022 to 2024.
48. Randall Dunn – Head of School from 2011 to 2022.
49. Robert Chapman – trustee from 2019 to present.
50. Ronald Seymore – trustee from 2019 to 2022.
51. Ryan Allen – Assistant Head of School from 2023 to present.
52. Ryan Harris – trustee from 2023 to present.
53. Sarah Norris – trustee from 2019 to 2024.
54. Scott Kaniewski – trustee from 2019 to 2023.
55. Shelley Greenwood – Assistant Head of School from 1993 to 2023.
56. Susan Bolon – Director of Human Resources from 2018 to present.
57. Tanya Polsky – trustee from 2020 to present.
58. Thomas Hagerman – Head of School from 2022 to present.
59. Tim Cronister – Director of Student Life from 1998 to present.
60. Timothy Hurd – trustee from 2019 to 2022.
61. Traveres “Tray” White – Middle School Division Director from 2023 to present.
62. Val Vlahos – trustee from 2019 to 2024.
63. Valerie Wiley – trustee from 2019 to 2021.
64. Vince Cozzi – trustee from 2022 to present; former Chair.
65. Walter Pryor – trustee from 2019 to 2022.



## Exhibit A – Select Screenshots from Survivors of Latin Instagram Page

The screenshot shows an Instagram post from the account 'survivorsoflatin'. The post features a blue background with white and orange text. The main text is a personal anecdote about a senior's reaction to the author's ethnicity. The post is titled 'LATIN Survivors' and 'Latin '12'. The account name 'survivorsoflatin' is visible at the top, along with a 'Follow' button. The text of the post reads: 'My sophomore year a senior asked me where I was from and when I told him I was Arab, he very vocally in front of several other students asked me why I hadn't blown up the whole school yet. I told some peers about the encounter and most of the responses were "that's just the way he is" and dismissed it entirely. Another senior my freshman year I remember showed up for Halloween dress up day as a "terrorist". To my knowledge he was never reprimanded for this.' The post has 102 likes and 77 comments. The account name 'survivorsoflatin' is also visible in the top right corner of the post area.

**LATIN**  
**Survivors**

My sophomore year a senior asked me where I was from and when I told him I was Arab, he very vocally in front of several other students asked me why I hadn't blown up the whole school yet. I told some peers about the encounter and most of the responses were "that's just the way he is" and dismissed it entirely. Another senior my freshman year I remember showed up for Halloween dress up day as a "terrorist". To my knowledge he was never reprimanded for this.

**Latin '12**

survivorsoflatin • Follow

survivorsoflatin Text Description: My sophomore year a senior asked me where I was from and when I told him I was Arab, he very vocally in front of several other students asked me why I hadn't blown up the whole school yet. I told some peers about the encounter and most of the responses were "that's just the way he is" and dismissed it entirely. Another senior my freshman year I remember showed up for Halloween dress up day as a "terrorist". To my knowledge he was never reprimanded for this.

102 likes

77 comments

# LATIN Survivors

Microaggressions like people touching my hair without asking, being told I'm an Oreo/basically white, or that I'm pretty for a black girl, were so common that I didn't even realize how wrong it was until after I left. I'd been there my whole life and that was just the norm. However, in middle school I realized that it wasn't just micro aggressions or biases but blatant racism that was allowed at the school. However, in middle school I realized that it wasn't just micro aggressions or biases but blatant racism that was allowed at the school. One day a white student made a very racist and derogatory comment and I overheard it.

Alumni

survivorsoflatin • Follow

survivorsoflatin Text Description: Microaggressions like people touching my hair without asking, being told I'm an Oreo/basically white, or that I'm pretty for a black girl, were so common that I didn't even realize how wrong it was until after I left. I'd been there my whole life and that was just the norm. However, in middle school I realized that it wasn't just micro aggressions or biases but blatant racism that was allowed at the school. One day a white student made a very racist and derogatory comment and I overheard it. When I went to administration I was told "He would never say that, he's a good kid." This student had a pattern of saying offensive things, it wasn't out of character, I was shocked that I wasn't believed. They made me question if I heard what I knew I heard. Then they made us sit in a room together and we apologized to each other for the "misunderstanding." From then on I knew that when it came down to it, Latin administration would never be on my side.



225 likes



# LATIN Survivors

My freshman year, I was in Honors Algebra II with Mr. [redacted]. [redacted] (2016) sat at the table next to me. He began saying "jokes" to students [redacted] (2017) and [redacted] (2017) about undocumented immigrants and the Holocaust. He said that it was okay to say because "Kevin Hart made the same jokes". Mr. [redacted] was writing at the board and never turned around.

Latin '17

survivorsoflatin • Follow

survivorsoflatin Text Description: My freshman year, I was in Honors Algebra II with Mr. McArthur. [redacted] (2016) sat at the table next to me. He began saying "jokes" to students [redacted] (2017) and [redacted] (2017) about undocumented immigrants and the Holocaust. He said that it was okay to say because "Kevin Hart made the same jokes". Mr. [redacted] was writing at the board and never turned around.

177 likes



177 likes



# LATIN Survivors

Racism at Latin isn't limited to students. It's exacerbated by an often racist and complicit administration. When I was a senior, I was told by several friends about multiple racist comments made by a group of white freshmen boys. One girl went to the freshman dean to ask him to intervene. He then told her, a black girl, that she should have calmly explained why their comments were offensive instead of calling them racists. I confronted the dean about his response and he doubled down on his comments. He said maybe she was having a hard time at Latin because by calling these boys racists she was "inviting" them to say offensive comments and bully her.

Latin '14

survivorsoflatin • Follow

survivorsoflatin Text Description: Racism at Latin isn't limited to students. It's exacerbated by an often racist and complicit administration. When I was a senior, I was told by several friends about multiple racist comments made by a group of white freshmen boys. One girl went to the freshman dean to ask him to intervene. He then told her, a black girl, that she should have calmly explained why their comments were offensive instead of calling them racists. I confronted the dean about his response and he doubled down on his comments. He said maybe she was having a hard time at Latin because by calling these boys racists she was "inviting" them to say offensive comments and bully her. I was so disgusted that I told my dean, another white man, about my conversation and he completely brushed it off. I then told a POC teacher about the situation looking for advice. He confessed that POC teachers had complained to the administration about racism at the school but that they'd gone largely unheard and he wasn't sure if there was anything I could really do.

10/10/2022



249 likes



# LATIN Survivors

My junior year I was placed in a student focus group with two other students of color to talk about diversity and inclusion. All the white students sat on the other side of the room away from us. When the question of racism in the classroom came up, I decided to speak up about the literal racial divide in the class room. The facilitators, both students and faculty, were overwhelmed and severely under prepared. It was one of many instances in my four years at Latin where students of color were forced to share their opinions and experiences with white people but also a time where teachers stood by and let it happen.

Latin '17

survivorsoflatin • Follow

survivorsoflatin Text Description: My junior year I was placed in a student focus group with two other students of color to talk about diversity and inclusion. All the white students sat on the other side of the room away from us. When the question of racism in the classroom came up, I decided to speak up about the literal racial divide in the class room. The facilitators, both students and faculty, were overwhelmed and severely under prepared. It was one of many instances in my four years at Latin where students of color were forced to share their opinions and experiences with white people but also a time where teachers stood by and let it happen.

By: survivorsoflatin



233 likes



# LATIN Survivors

M [redacted] used to have a finsta that consisted of videos his white friends (I.E. H [redacted], I [redacted], R [redacted], Z [redacted]) calling people f\*\*\*\*\* and the N-Word, doing racist impressions, and making very scary and disgusting statements about girls in our grade. It was obvious from the videos that they were either filmed in the school or across the street in Lincoln Park. I transferred schools so there wasn't much I could do from my end because I didn't go to Latin anymore, but I sent the page to a friend of mine who still went to Latin and asked her to report it for me. She told me that after reporting it, the school said that they couldn't do anything about the videos, and the boys faced ZERO consequences.

Alumni

survivorsoflatin • Follow

survivorsoflatin Text Description: [redacted] used to have a finsta that consisted of videos his white friends (I.E. [redacted], [redacted], [redacted], etc.) calling people f\*\*\*\*\* and the N-Word, doing racist impressions, and making very scary and disgusting statements about girls in our grade. It was obvious from the videos that they were either filmed in the school or across the street in Lincoln Park. I transferred schools so there wasn't much I could do from my end because I didn't go to Latin anymore, but I sent the page to a friend of mine who still went to Latin and asked her to report it for me. She told me that after reporting it, the school said that they couldn't do anything about the videos, and the boys faced ZERO consequences. The fact that the page even existed, with its heinous content, and that he only allowed my white classmates to follow it, shows just how fucked up the mentality is of a lot of the people that go to this school and that. It's a breeding ground for racism and white supremacy. There's a reason why I left Latin.

Edited 12/24



275 likes

1/18 20 2022



# LATIN Survivors

I was on Honor Council. I don't remember the details, and for confidentiality's sake it would probably be best that I don't share them in any event, but two white students were brought before us for incredibly racist actions against a POC. After a lengthy, painful deliberation (where some people on the body's biases were clearly showing), we decided to give them both an out-of-school suspension. Once one of their parents lawyered up, the administration unilaterally overturned the sanction. If I recall correctly, they instead put the students on a meaningless probation.

Alumni

survivorsoflatin • Follow

survivorsoflatin Text Description: I was on Honor Council. I don't remember the details, and for confidentiality's sake it would probably be best that I don't share them in any event, but two white students were brought before us for incredibly racist actions against a POC. After a lengthy, painful deliberation (where some people on the body's biases were clearly showing), we decided to give them both an out-of-school suspension. Once one of their parents lawyered up, the administration unilaterally overturned the sanction. If I recall correctly, they instead put the students on a meaningless probation.

Show More



281 likes

14 Feb 2022



# LATIN Survivors

I suffered with mental illness throughout my 14 years at Latin. It got worse my freshman year of high school, causing me to take a leave for a month. When my family tried to have a meeting about returning to school Mr. [redacted] told my parents that I would not be allowed back yet because I was dangerous to the other students, even though that could not have been further from the truth. It turned out that parents who had pull due to their involvement with the school and money had told the administration that they didn't think I belonged back in my grade because they didn't think the topic of depression and anxiety should be discussed in a school setting. I wasn't allowed back for another month due to these parents.

Latin '15

survivorsoflatin • Follow

survivorsoflatin Text Description: I suffered with mental illness throughout my 14 years at Latin. It got worse my freshman year of high school, causing me to take a leave for a month. When my family tried to have a meeting about returning to school Mr. Graf told my parents that I would not be allowed back yet because I was dangerous to the other students, even though that could not have been further from the truth. It turned out that parents who had pull due to their involvement with the school and money had told the administration that they didn't think I belonged back in my grade because they didn't think the topic of depression and anxiety should be discussed in a school setting. I wasn't allowed back for another month due to these parents.

Edited 12/11



327 likes

78,311 views





# LATIN Survivors

After the passing of our grade's dean Mr. [redacted] we had Mr. [redacted] serve as our dean for a while. He was terrible. In no way, shape, or form was he qualified to hold that position. Especially after such a tragic event. And other faculty agreed. He clearly favored the white male students, especially those on his baseball team. He didn't care about the experiences of women and students of color. I'm glad he's gone, but he never should have had that position in the first place.

Latin '17

survivorsoflatin • Follow

survivorsoflatin Text Description: After the passing of our grade's dean Mr. [redacted], we had Mr. [redacted] serve as our dean for a while. He was terrible. In no way, shape, or form was he qualified to hold that position. Especially after such a tragic event. And other faculty agreed. He clearly favored the white male students, especially those on his baseball team. He didn't care about the experiences of women and students of color. I'm glad he's gone, but he never should have had that position in the first place.

Edited: 2020



282 likes



# LATIN Survivors

I had Dr. [redacted] as my psychology teacher. She was black, as was I. And I received a B on one of her papers. M. [redacted], an Indian student, looked me dead in my eyes and said "you only got that grade because you're black". I went to Mr. [redacted] and told him what happened, I told him I was just going to ignore it. He told me that I should have said something to her because that type of behavior was not ok. But things like that were happening every day around me so it was normal to me.

Arjah'Nay Herron '13

survivorsoflatin • Follow

survivorsoflatin Text Description: I had Dr. [redacted] as my psychology teacher. She was black, as was I. And I received a B on one of her papers. [Redacted], an Indian student, looked me dead in my eyes and said "you only got that grade because you're black". I went to Mr. [redacted] and told him what happened. I told him I was just going to ignore it. He told me that I should have said something to her because that type of behavior was not ok. But things like that were happening every day around me so it was normal to me.

Ed 1/10 2013



271 likes

14.10.2013



# LATIN Survivors

Everyday I spent at Latin was dreadful.

Two students locked me in a room and so I told them that if they didn't let me out I would hide their iPads. I was put in detention by Ms. F [redacted] for "touching a student's property" and they were left without any punishment because their parents were big donors.

I went to report a girl for cyber stalking me and the counselor stopped me and said, "if anything troubles you in the future, come to me. You know how Ms. [redacted] is."

Latin '22

survivorsoflatin • Follow

survivorsoflatin Text Description: Everyday I spent at Latin was dreadful.  
Two students locked me in a room and so I told them that if they didn't let me out I would hide their iPads. I was put in detention by Ms. [redacted] for "touching a student's property" and they were left without any punishment because their parents were big donors.

I went to report a girl for cyber stalking me and the counselor stopped me and said, "if anything troubles you in the future, come to me. You know how Ms. [redacted] is." I became friends with a student of color who was always bullied. She constantly said she wanted to kill her self and that Latin was prison for any non-white student. She would say suicidal things in class and the teachers would punish her for speaking out of line. A very large impact on her depression came from being treated poorly if she didn't act "white". Latin a racist, sexist, homophobic, place where only people with money for n. DO NOT GO TO THIS PRISON!

Edited 12/2



346 likes

SHARE



# LATIN Survivors

Content Warning: *Suicide*

Every single year at latin, at least 2 classmates close to me have seriously considered suicide. I was one of them. You cannot tell me that Latin had no involvement. There was no safe space to go to- Ms. [redacted] was absolutely horrible and offered nothing. I had a friend tell me they'd rather commit suicide than see her.

Student

survivorsoflatin • Follow

survivorsoflatin Text Description: Every single year at latin, at least 2 classmates close to me have seriously considered suicide. I was one of them. You cannot tell me that Latin had no involvement. There was no safe space to go to [redacted] was absolutely horrible and offered nothing. I had a friend tell me they'd rather commit suicide than see her.

Edited 2020



308 likes

June 29, 2020



# LATIN Survivors

I worked at the Latin Lower School for years and never in my life, I have experienced such blatant racism that everyone saw and noticed yet it went unchecked. The racism I saw was not only direct at Black and POC staff and faculty that worked in the lower school but it was also directed towards the children. Black or POC staff were often mistreated and looked at as being "less than by the white faculty. If there was ever an issue with a child, Black and POC staff were made to feel like they were the reason why the problem arose and they dropped the ball; often being the ones disciplined. White extended day staff members were held to different standards than that of Black or POC staff.

Extended Day Staff Member

survivorsoflatin • Follow

survivorsoflatin Please see Alt Text for Text Description.  
Edited 12/11

279 likes

# LATIN Survivors

## Content Warning: Suicide

My daughter [redacted] attended Latin from Jr Kindergarten through 5th grade. (1990 - 1997) She was not a POC. She was cute and smart and funny. But she danced to her own tune - wearing dresses when the other girls wore jeans; drinking milk when others drank sodas; not going along with something just because others did. Beginning in first grade she was bullied constantly. Our complaints fell on deaf ears - I later figured out that it was because the ones who bullied her had parents who were big donors to the school. But I got lame excuses, like maybe she just fell down the stairs and didn't get pushed - its her word against his.

Parent

survivorsoflatin • Follow

No comments yet.

Start the conversation.

632 likes

# LATIN Survivors

## Content Warning: Suicide

I was angry at Latin at the time she was being bullied and the school knew and wouldn't do anything about it. I am angry at myself that I didn't take her out of Latin sooner but I knew what a good school it was academically. I am even angrier at Latin since her death - I will never know how much those years of being bullied contributed to her death. I am so glad people are finally speaking out about the culture of the school. Sorry this is so long but hearing how many others were mistreated set me off.

Parent



# LATIN Survivors

My math teacher called me the n-word accidentally and never apologized. I've never felt comfortable in her class since.

Student

survivorsoflatin • Follow

survivorsoflatin Text Description: My math teacher called me the n-word accidentally and never apologized. I've never felt comfortable in her class since.



354 likes





# LATIN Survivors



91%  
of BIPOC Latin  
alumni have experienced  
microaggressions  
from teachers while at  
Latin.



# LATIN Survivors

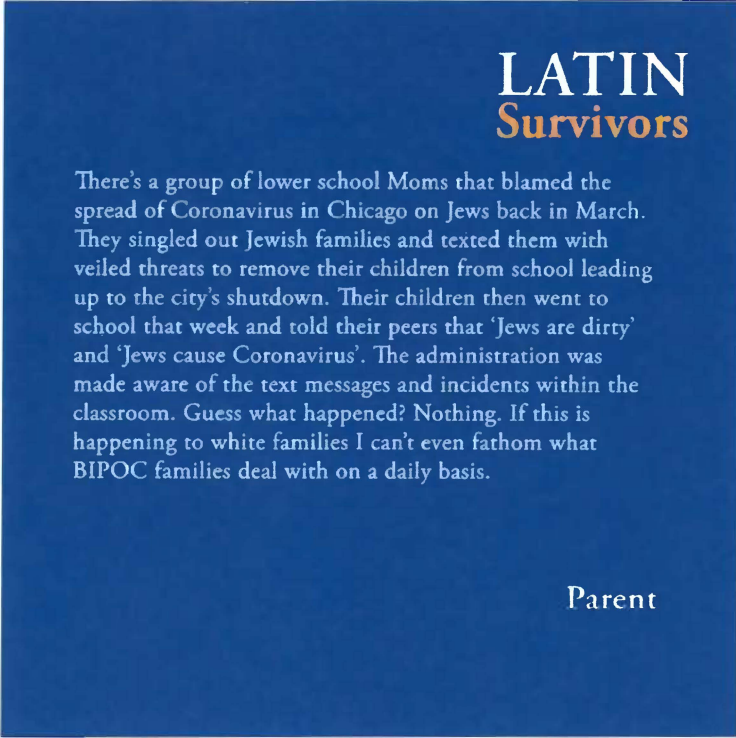
I was always an outcast at Latin. I was known as the fat ugly black girl of my class. There was a racist bully that I only really had to deal with in middle school. He said the N-word in Spanish class. I told the teacher. The teacher was furious and reported it. My parents got involved and administration said I mistaked it for the word negro, which is the color Black in Spanish. My mom went on to explain to the administration that her daughter knows that word and would never mistake it. It was a lost cause the administration was intimidated by that family and silenced mine. During that school year he also said "All Muslims are terrorist". The same boy said "Black people are no better than the bottom of my shoe".

Jocelyn McCullough

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survivorsoftatin Text Description:  
 "There's a group of lower school Moms that blamed the spread of Coronavirus in Chicago on Jews back in March. They singled out Jewish families and texted them with veiled threats to remove their children from school leading up to the city's shutdown. Their children then went to school that week and told their peers that 'Jews are dirty' and 'Jews cause Coronavirus'. The administration was made aware of the text messages and incidents within the classroom. Guess what happened? Nothing. If this is happening to white families I can't even fathom what BIPOC families deal with on a daily basis."

128w



498 likes

4/12/2020

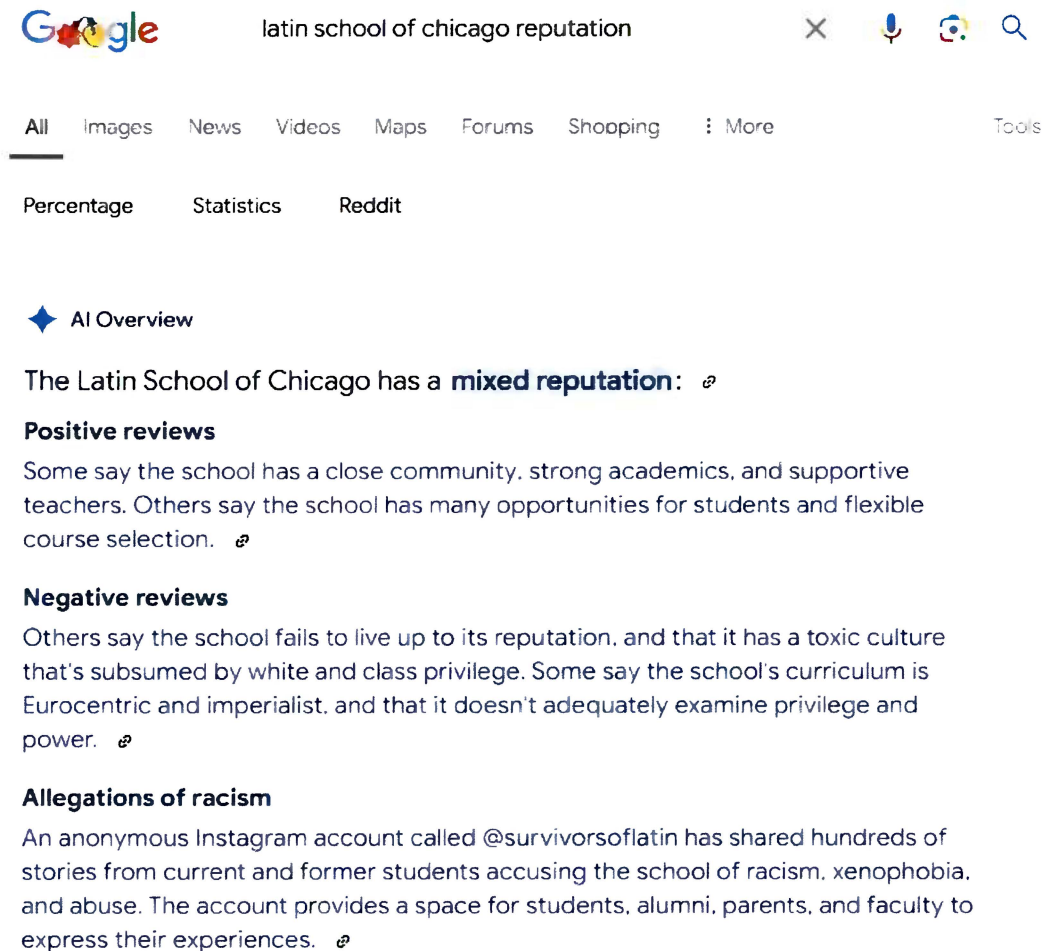


# LATIN Survivors

I was a lifer before I left Latin. In 7th grade I was called a slave and a n[redacted]r by another girl in my grade (also a lifer) to my face at the lunch table. Nobody said anything to her. Nothing was done. Later I found out she would make disparaging/racial comments anytime I wasn't around. It's still one of the most humiliating and hurtful things that has ever been said to me by a peer. It was why I left that school.

Alumni

## Exhibit B – Google Screenshot (captured 12.9.24)



The screenshot shows a Google search interface. The search bar contains the text "latin school of chicago reputation". Below the search bar, there are navigation links for "All", "Images", "News", "Videos", "Maps", "Forums", "Shopping", and "More". The "All" link is selected. Below these links, there are additional options: "Percentage", "Statistics", and "Reddit".

◆ AI Overview

The Latin School of Chicago has a **mixed reputation**: [↗](#)

**Positive reviews**

Some say the school has a close community, strong academics, and supportive teachers. Others say the school has many opportunities for students and flexible course selection. [↗](#)

**Negative reviews**

Others say the school fails to live up to its reputation, and that it has a toxic culture that's subsumed by white and class privilege. Some say the school's curriculum is Eurocentric and imperialist, and that it doesn't adequately examine privilege and power. [↗](#)

**Allegations of racism**

An anonymous Instagram account called @survivorsoflatin has shared hundreds of stories from current and former students accusing the school of racism, xenophobia, and abuse. The account provides a space for students, alumni, parents, and faculty to express their experiences. [↗](#)