

March 25, 2026

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

Dear Trustees:

More than a year ago, on behalf of a group of Members of the Latin School of Chicago, we called upon the Board of Trustees to take necessary corrective action to address serious misconduct at the School. One year later, the Head of School and Chief Financial Officer have both abruptly resigned—purportedly voluntarily—and the Dean of Students was reassigned, yet neither the Board nor the School has taken any visible steps to acknowledge or remedy that misconduct. The need for action remains largely ignored. We write now to renew and supplement our demands and to call attention to issues that have continued unabated since we first raised them over a year ago, as well as new issues that have arisen over the past year. At this point, these matters require immediate attention and action.

In response to our January 23, 2025 letter (the “Letter”), we were informed that the Board formed a special committee to oversee an investigation into the conduct outlined in the Letter, and hired the law firm Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn”) to conduct that investigation (the “Board Investigation”). Although we have received relatively little information from the Board about its investigation, it is clear from what we have been able to learn that the Board Investigation was deficient in design and practice, ignoring relevant evidence available to it and ultimately failing to meaningfully address the issues raised in our Letter.

The shortcomings of the Board Investigation were brought into stark relief by our own parallel investigation conducted on behalf of Latin families (the “Member Investigation”), relating to both the incidents described in our Letter and other more recent acts of misconduct at the School. Although, unlike the Board Investigation, we have not had access to current School employees and could not compel anyone to cooperate with our work, the Member Investigation has revealed numerous persistent concerns that have not been adequately examined or remedied by the Board. Among other things, incidents of bullying, harassment, discrimination, and antisemitism continue to run rampant at Latin. Staff members who speak out or seek to protect the interests of affected students are not supported, but rather are silenced, intimidated, or disciplined—including through termination.

Our investigation has only underscored the concerns raised in our initial Letter about the persistent conflicts of interest amongst the Board and the inability of the Board to oversee an independent and unconflicted investigation, as the law requires. We accordingly call on the Board to immediately release a full accounting of its investigation to date, in the interest of transparency to the Latin community, and to supplement that investigation with real fact-finding designed to reveal the persistent problems at the School. In addition, given the Board’s failure to adequately address previously disclosed misconduct, it is clear that the Board’s current leadership is incapable of performing their fiduciary duties and must resign immediately so that new leadership can work openly and collaboratively with the full Latin community to meaningfully ensure that the School is a safe place for students. Given that so little action has been taken to date, we demand that the Board act on this renewed call to action by no later than **April 15, 2026**.

Background

As described in our original Letter, following several troubling incidents that appeared to constitute a pattern, it became apparent that the School was no longer able to ensure the physical and emotional safety of its students and that the Board's trustees had persistently failed to discharge their fiduciary duties, resulting in serious physical, psychological, and emotional harm to students and permanent harm to the School's financial sustainability and educational standing. The incidents outlined in the Letter included:

- A child was chased down, cornered, and physically assaulted on the playground. Afterward, the School knowingly failed to inform the child's parents and failed to discipline any students responsible for the attack.
- Another child experienced intense and prolonged cyberbullying from classmates, including a multi-student group chat used to bully this student, a Snapchat message that circulated to hundreds of students, and a separate Snapchat message directing him to go kill himself. The student took his own life. The School knew about this unchecked bullying and failed to notify the parents of the victim, failed to remedy it, and failed to discipline the students involved.
- One student verbally harassed a Jewish student at a cross-country event by shouting "run Jew run, there's money at the end." This incident was reported to the School, but the harasser faced no disciplinary consequences.
- A group of students knowingly played the Nazi anthem during band practice, but none of the students involved were disciplined.
- A teacher (and now-former Dean of Students), Bridget Hennessy, engaged in crude sexual conversations with minor students during a field trip, and dared children to lick Nutella off one another. She faced no discipline.

In response to these incidents and others, and as described in the Letter, School leadership created an environment of impunity for misbehaved students (and faculty) and intentionally concealed misconduct from parents—including by: manipulating and misusing counseling resources as an excuse for failing to discipline students; withholding crucial information from parents under the guise of confidentiality; and turning a blind eye to misconduct and discrimination by teachers and staff. The officers and trustees breached their duties by failing to apprise themselves of and/or address these recurring issues, which led to fundamentally broken oversight and governance of the School. These failures also resulted in real harm, including the tragic loss of life of one student, physical and psychological injuries to other students, dissipation of School assets, significant losses in donation-based revenue and enrollment numbers, and a quantifiable loss in educational reputation.

Despite the demand in our Letter for a comprehensive, independent investigation to assess and remedy these shortcomings (assuming the Board could identify a non-conflicted majority to oversee it), the Board once again failed to meet its duties. After the Board's special committee hired Quinn, the firm began its investigation in early March 2025. Since then, counsel for the Board has periodically provided information regarding the progress of the investigation. Based on information from Quinn, it appears that the Board Investigation involved a review of unspecified internal documents and communications, as well as the interviews of approximately 30 individuals connected with the School. We understand that the Board Investigation has now been deemed complete.

At the same time, Boies Schiller Flexner LLP (“BSF”) and a private investigations firm, Clovis Quantum Solutions, conducted the separate Member Investigation to hear from current and former Members, as well as faculty and staff. Over the last eight months, BSF and Clovis have conducted interviews with dozens of members of the Latin community and in total have heard from more than 100 individuals associated with the School. These touchpoints, along with other fact-finding and public records, have reinforced that there is ongoing, serious misconduct at the School, including related to unlawful discrimination, bullying, antisemitism, failure to discipline, and financial malfeasance.

The Board Investigation Has Failed

The Board Investigation has been so superficial, and so deficient, that it raises real concerns about whether the Board commissioned a real investigation at all, as opposed to a fig leaf designed to make it appear as if the Board cared about the concerns set out in our Letter. As a non-profit educational institution, the School must do more than engage in a performative exercise designed to shield them from liability. At minimum, the School must confront the serious issues that pervade student life at the School.

To start with, while our demand called for a transparent, independent investigation, the scope of the Board Investigation was opaque, ill-defined, and marked by uncertainty as to who was involved and in charge. To say mixed signals were sent to the Latin community would be an understatement. To BSF, Quinn described its client as the Board’s special committee. To some individuals Quinn interviewed, the investigation was described as “independent.” In written communications sent to School employees, the investigation was described as having been initiated by the entire Board of Trustees. But when employees were required to fill out a form concerning the identity and location of potentially relevant documents, they were told to provide the completed form to school administrators. Given these conflicting messages, no one looking to provide information could reasonably identify whom the investigation was being directed by or for, and to whom any information being collected would be delivered or divulged.

The Board’s failure to adequately respond to the concerns illustrated in our Letter is also laid bare by its grossly deficient investigation. Despite what should have been carte blanche access to School officers, trustees, staff, and Members—not to mention the ability to review all School documents—the Board Investigation failed to engage in any factfinding that generated, or would have reasonably been expected to generate, useful and unbiased information. As an example, the group of individuals that the Board selected to interview consists almost entirely of School insiders, such as current or former trustees, heads of school, and administrators, many of whom are complicit in the misconduct. On the other hand, the Board affirmatively declined to interview individuals with personal knowledge of misconduct by School insiders—even those who offered to speak to their firm.

To our knowledge, the Board (through Quinn) interviewed *only one* family with children currently or formerly enrolled at the School and did not interview any current or former students whatsoever. The Board Investigation also failed to speak with representatives of the teachers’ union, and even failed to interview Bridget Hennessy, who was identified by name in our Letter and who BSF repeatedly reminded Quinn (during the Board Investigation) was an obvious fact witness. Quinn confirmed that Hennessy had not been interviewed, nor had she declined to be interviewed—leading to only one possible inference, which is that the Board and/or its counsel chose not even to speak to

her. There is no reasonable explanation for that choice, although the fact that Hennessy either was removed or stepped down from her role as Dean of Students shortly after we submitted our Letter strongly suggests that the School understands she engaged in wrongdoing and is willfully turning a blind eye to the facts and to the continuing risk.

This cherry-picked process had no prospect of yielding meaningful information about the lived experiences of students and parents who experienced bullying, harassment, discrimination, and antisemitism. In fact, we are aware of at least one instance in which an employee of the School affirmatively reached out to Quinn with relevant information regarding its investigation and indicated a willingness to speak to Quinn. That same employee returned the form attached to the document preservation notice from the Board indicating possession of potentially relevant documents. Quinn and the Board failed to follow up with this individual and, as a result, this valuable source of information was omitted entirely from the Board Investigation.

The Board Investigation's failure to capture relevant experiences of parents and students is a natural consequence of the way in which the Board structured its investigation from the start, and of the conflicts identified in our initial Letter and which the Board was obviously not able to overcome. From the very beginning, we regularly urged the Board to make the School community aware of its investigation so that people with relevant information, such as current and former parents, students, and staff, would know that they could come forward and share information—and do so without fear of reprisal. But the Board chose not to do so, instead keeping its investigation as quiet as possible, soliciting information from only current employees and trustees. That is not an investigation designed to reveal truth and come up with remedies that could fix the problems at Latin and help the children and families who put their trust in the School; it is effectively no investigation at all.

In addition to failing to solicit community input, the Board also failed to provide parents and students with any reassurance that information provided by them would not be used against them—*i.e.*, that any interviewees who spoke out would not face unfair retaliation by the School. During the parallel Member Investigation, we spoke with numerous parties who expressed deeply-rooted fears of such retaliation. Parents, students, and teachers expressed grave concerns about sharing their experiences and true opinions because of the School's unilateral, discretionary power to, among other things, end a student's enrollment or a teacher's employment. School administrators and staff are known to have retaliated against families, as well as fellow teachers and staff, who were outspoken in their criticism of the school. By failing to reassure the community that they would not face retaliation—and by failing to set up any type of anonymous or protected reporting mechanism—the Board ensured that those with potentially relevant information would be too intimidated to share it.

Even when the Board Investigation did interview someone with potentially relevant information, there is cause to believe that those interviews were superficial and incomplete. While most of those interviews were conducted confidentially and we were not provided any information about how they were conducted or what information was obtained, BSF was able to attend one such interview of the parents of a student who experienced extensive bullying, which was conducted by lawyers from Quinn in September 2025. Based on our direct observation, it seems obvious the interview was not aimed at real fact-gathering about persistent problems in the School that enable such bullying to continue unchecked. Instead, the questions were highly focused on the students involved in the bullying, as opposed to the actions of relevant faculty and staff, and seemed geared toward finding ways to excuse the School's failures by portraying student bullying as inevitable. The Board's counsel even failed to ask the most basic fact-gathering questions of all: whether the family

knew of other individuals who would have information about the incidents they described, or of anyone else who had experienced bullying or harassment at the School. The Board and its counsel also failed to reassure the family that they would not face retaliation as a result of their participation.

The Board's inadequate approach was also apparent during discussions between BSF and Quinn as the investigation progressed. While we appreciate Quinn's willingness to remain in contact throughout the investigation, Quinn shared little substantive information about their findings or insight into their process. For example, Quinn declined to provide any information on how the Board went about selecting which individuals to interview; which documents and communications Quinn collected or reviewed (and which, if any, the Board and/or the School refused to share with Quinn); and to what degree the special committee and/or the Board was exercising control over the investigation. Rather than answer these basic questions, the Board's counsel instead repeatedly tried to turn the questions around, asking BSF to identify its clients, witnesses, and sources of information.

As we have said before, all of the Board's empty avoidance maneuvers miss the point. The Board has a fiduciary and moral obligation to ensure that the School is a safe environment for the students who attend Latin. Rather than being concerned with the identity of BSF's clients—a fact that only matters in the event of a derivative lawsuit—the Board Investigation should be singularly focused on diagnosing and curing the persistent problems at Latin. But that is not the investigation that we observed and, in our interactions, it seemed as if the Board was more interested in understanding its litigation risk—who the plaintiffs might be and what evidence they have—than in protecting the students.

For example, the Board's counsel repeatedly asked BSF about information that the Board already had in its possession and control. Such questions can only be understood as trying to ferret out what evidence was collected during the Member Investigation, as opposed to understanding the facts. In one case, Quinn asked about an incident described in the Letter regarding the playing of the Nazi anthem. But the Board and its counsel already had access to detailed written communications and documentation of this incident, which identified persons involved as well as Members who expressed concerns about the incident and the School's handling of it. Ultimately, despite its ready access to those records and awareness of numerous people with knowledge of the incident—which, during the Board Investigation, happened again—the Board Investigation included an interview of only one parent in connection with the playing of the Nazi anthem.

Serious Misconduct at Latin Continues Unabated

In the meantime, in the year since the Members first raised these concerns with the Board, incidents of bullying, harassment, discrimination, and antisemitism have continued. The School did not communicate with Members about these incidents. Instead, information emerged from the parallel Member Investigation, including the interviews of dozens of current and former Members, employees, and other individuals connected to the School. In addition, the Member Investigation uncovered numerous additional incidents of misconduct over the last several years that also appear not to have been addressed by the School in any meaningful way. The following examples, while by no means exhaustive, illustrate the continued significance of these concerns.

Discrimination and harassment:

- Earlier this school year, a teacher at Latin overheard two students discussing practicing a Nazi anthem¹—a fact that is shocking and outrageous in its own right, and made even more shocking because this is the second time in two years that there was an incident involving Latin students playing or planning to play a Nazi anthem.² Within weeks of the public reporting of this second incident, Thomas Hagerman announced that he was stepping down from his position as head of school, purportedly for health reasons.
- Numerous other antisemitic incidents occurred at the School, including antisemitic remarks made by staff and students, and the exclusion of Israel from international fairs and events. Despite parents reporting antisemitic incidents directly to the Board, appropriate corrective action was not taken.
- Repeated harassment of LGBTQ+ students and faculty members that similarly went unaddressed by the School.
- Multiple incidents of racially-based harassment and disparate treatment towards current and recent Latin employees were reported, including anti-Asian and anti-Black comments by a security guard at the School. Reports of this conduct to School administrators went unaddressed and the security guard remained employed at the School.
- Black students and parents also reported unequal treatment from School officials, including in how discipline and behavioral interventions were implemented. As one example, Latin faculty pressured the family of a new Black junior kindergarten student to engage in parental coaching services and counseling, reporting that the child was displaying severe anxiety at school early in the school year. The family, who observed no similar issues at home, believed these interventions were unnecessary and racially motivated. When the family informed Hagerman of their belief that racism played a role in their negative experience at Latin, Hagerman responded in substance that this couldn't be true because Latin was a diverse school.

¹ *Elite Chicago middle school embroiled in Nazi-music controversy for second time*, The New York Post (Jan. 4, 2026), <https://nypost.com/2026/01/03/us-news/elite-chicago-middle-school-embroiled-in-nazi-music-controversy-for-second-time/>.

² *Antisemitism festers at famed Chicago school—including incident where some band members allegedly played Nazi Party anthem: parents*, The New York Post (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/>.

- Male coaches and male supervisors in the Latin athletic department reportedly engaged in inappropriate conduct towards female students and staff, including inappropriate remarks to a female employee on the coaching staff, texting with students—which is strictly prohibited under School policy—and bullying comments towards female student athletes. A female coach in the athletics department reported this conduct to Latin’s leadership, including Thomas Hagerman, but was rebuffed and her employment contract was not renewed by the School. This conduct was certainly known to the Board, as the female coach wrote a letter directly to the Board about the misconduct she witnessed and the retaliation she experienced in return.
- It was also reported to Latin administrators that one male coach acted inappropriately by putting his hands around female students’ waists and demanding to review a female student’s private photos on her iPad. This male employee remained employed at Latin.

Bullying:

- Numerous incidents of bullying involving multiple male and female students were reported. These incidents included ones where students were physically attacked by their peers—including being thrown to the ground, pushed, punched, and kicked—as well as ridiculed and taunted by peers at the School. In each of these incidents, the School failed to adequately remedy the situation. Even when a victim’s parents affirmatively reached out to the School for help, administrators took no action.
- Prolonged bullying of a male student including an incident during which students “tucked a cafeteria knife” into another student’s binder to harass him. Latin expelled the student who had been bullied and failed to discipline the perpetrators.

Communication failures:

- Multiple individuals reported failures of the School to adequately communicate with families about their children at the School, including by withholding important information.
- An especially troubling incident involved a female student who threatened self-harm during class one day. After the child briefly met with the school counselor, she was sent on her way to an after-school club without the counselor notifying the club sponsor or letting anyone else know what had happened—including the child’s parents. A Latin teacher voiced concerns to the administration about the incident but the School never followed up.

- Parents and former employees also pointed to the School’s lack of transparency about other matters, like the departures (and in one case, return) of School personnel.

These are mere examples of the numerous stories that were uncovered in the Members’ Investigation, and which the Board Investigation failed to reveal because it involved no outreach into the broader Latin community, including current and past families and students, or former employees. These incidents, among numerous others, make clear that our initial demands, and the ones set forth below, are well-founded. As one faculty member who recently left the school stated: “the board and administration have not shown a true commitment to Latin’s mission,” and “what was once considered a community and safe place for students is no longer.”

And in addition to failing to investigate, let alone address or remediate, that bullying and discrimination, the Board has also continued to neglect its duty to properly manage the School’s finances. For example, several years ago, Latin purchased a row of residential homes in Chicago, with the stated intention of converting these homes into overflow school facilities for the lower school. However, it has now become apparent that the land and homes cannot be converted for school use—a fact the Board should have known from the beginning—and after carrying the costs of the property for four years, the School is now attempting to sell these properties at a loss.³ This mistake is estimated to cost Latin at least \$2 million, during a time when donations are flagging and the School’s finances are already in precarious shape.

Latin’s Attempts at Remediation Were Superficial and Inadequate

Latin’s efforts to remediate the failings identified in last year’s Letter and to prevent the types of ongoing misconduct detailed herein have been inadequate, bordering on the non-existent. To our knowledge, the *only* thing Latin has done in response to the very serious concerns laid out in our Letter was to commission the Board Investigation, which was incomplete for the reasons discussed above. We are also aware that Latin’s Head of School and Chief Financial Officer have resigned, and the Dean of Students was reassigned, in the last year—although none of those were acknowledged to have occurred at the insistence of the School, let alone to have been the result of any finding of misconduct. Instead, Hagerman claimed in a letter sent to the School community that he was voluntarily electing to step down at the end of the school year for health reasons. At the time Hagerman’s departure was announced, we asked the Board’s counsel whether Hagerman’s departure was connected to the Board Investigation. Quinn declined to answer, directing any inquiry on Hagerman to the School’s administrators. Even if Hagerman were terminated as a corrective action, though, the firing of a single administrator would be little more than symbolic. It would do nothing to address the foundational failure of leadership at the School, starting with the Board.

In sum, it is apparent that Latin is still plagued by pervasive bullying, harassment, discrimination, and antisemitism perpetuated by misbehaving students, faculty who act with impunity, and School officers and trustees who fail to properly respond or exercise needed oversight or leadership. Immediate corrective action remains necessary.

³ *Latin School Bails on Gold Coast Mansion Play, Lists Dearborn Row for Sale*, Hoodline (Jan. 27, 2026), <https://hoodline.com/2026/01/latin-school-bails-on-gold-coast-mansion-play-lists-dearborn-row-for-sale/>.

Next Steps

In light of these serious ongoing concerns, we again implore the Board to take immediate action, including the following:

1. Publicly release a detailed written summary of the Board Investigation, including descriptions of all interviews completed, documents requested and/or reviewed, and any other fact-finding, as well as details concerning the costs of the investigation. The Latin community is entitled to a full accounting of the Board's efforts if it is, in fact, taking their concerns seriously.
2. Supplement the Board Investigation with additional fact-finding. This step must involve developing a concrete investigative plan, disclosed to the School community in advance and with their input, and a plan for remediation.
3. Implement an internal reporting system available to faculty, staff, and Members to report misconduct. Any complaints should be reviewed by a subcommittee of the Board, which clearly communicates that it will treat the complaints confidentially and protect any reporters from reprisal by the Board or School administrators.
4. We understand that the School is beginning its search process to identify a new Head of School. That process must include full disclosure to any candidates of these issues, and as part of the selection process all candidates should formulate and propose remedial steps that Latin should take at the administrative level. Members should be involved in the search process, as well.
5. Finally, as previewed in our initial Letter and demonstrated by its investigation, the Board has demonstrated that in its present form, it is deeply conflicted and incapable of proper governance and oversight. The Board's leadership should immediately resign so that the Members, administrators, and new Board leadership can work constructively to address the serious problems that pervade the School.

We emphasize again, as we have in our prior written and oral communications, that the Board ought to be fully aligned with the rest of the School community in these endeavors. No one—other than a party seeking to evade liability for past misconduct—should have any interest in failing to uncover and fix bullying, harassment, discrimination, and antisemitism at Latin. This seems an uncontroversial proposition, and yet the Board's actions to date seem focused on liability management rather than leadership. We invite the Board to start over, with new leadership, and be partners with the School's Members to restore Latin to its former standing and, most importantly, to ensure that Latin students experience a safe school environment.

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Given that it has been over a year since we first raised these issues with the Board, we ask that by **April 15**, the Board indicate in writing the steps it intends to take. We remain prepared to take additional steps—including but not limited to referring the findings of the Member Investigation to the proper regulatory or law enforcement bodies and/or initiating litigation—but we reiterate our deep-seated desire that the School endeavor to take the appropriate corrective action of its own accord, and not as the result of any further outside investigation or legal intervention.

We are available to provide whatever additional information would be reasonably useful for the Board’s consideration.

Sincerely,

/s/ Matthew L. Schwartz
Matthew L. Schwartz
Jacqueline C. Kelly