

**ATTORNEY GENERAL
DEPARTMENT OF JUSTICE**

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CONCORD, NEW HAMPSHIRE 03301-6397

GORDON J. MACDONALD
ATTORNEY GENERAL



JANE E. YOUNG
DEPUTY ATTORNEY GENERAL

January 12, 2021

*Sent via electronic mail (mconnolly@hinckleyallen.com)
And regular U.S. Mail*

Michael J. Connolly, Esquire
Hinckley Allen
28 State Street
Boston, MA 02109

Re: St. Paul's School Compliance Overseer Position

Dear Attorney Connolly:

I write to follow-up on our conversation on January 11, 2021, concerning the selection of a new Independent Compliance Overseer for St. Paul's School. We completed interviews last week with the three candidates whose names you provided to this Office on December 19, 2020. Following those interviews, we have selected Donald E. Sullivan as the new Independent Compliance Overseer. I would ask that you please make arrangements with Mr. Sullivan for a start date as soon as is practicable. Please notify me once a start date has been agreed upon.

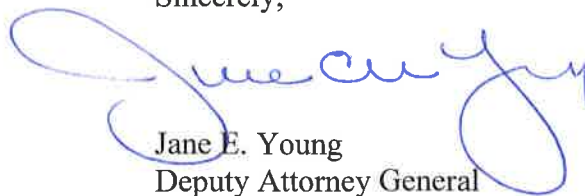
In addition, as we have previously discussed and agreed, the next step following Mr. Sullivan's start date will be to identify and hire—with Mr. Sullivan's assistance—a second person to work in support of the Independent Compliance Overseer. Essential to the functionality of both positions, St. Paul's School has agreed to indemnify both the Independent Compliance Overseer and the additional person for actions taken in their official capacity. You had previously indicated that you planned to consult with an attorney versed in this area of the law to work on the mechanics of accomplishing this agreed-to provision. Please update me on the status of this work so that Mr. Sullivan is ensured that he is appropriately protected and free to do the important work required by the Settlement Agreement.

Finally, it is the position of this Office that the additional agreed-to provisions, as outlined in my letter of December 17, 2020, require an addendum to our Settlement Agreement. I will forward you under separate cover, proposed language for just such an addendum.

Michael J. Connolly, Esquire
Re: St. Paul's School Compliance Overseer Position
January 12, 2021
Page 2 of 2

Thank you for your diligence in working to identify a new Independent Compliance Overseer and working to implement the additional terms of our agreement. I am confident that Mr. Sullivan's tenure as the Independent Compliance Overseer will be a successful one and will serve to further enhance the efforts made to date to ensure student safety is the top priority at St. Paul's School.

Sincerely,



Jane E. Young
Deputy Attorney General

GWW/gww

Cc: Donald E. Sullivan
Geoffrey W.R. Ward, Senior Assistant Attorney General

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