## ROBERT E. REAVIS II

## **ASSOCIATE DISTRICT JUDGE**

OTTAWA COUNTY COURTHOUSE 102 EAST CENTRAL, SUITE 204 MIAMI, OKLAHOMA 74354 (918) 542-2862

MADELYN ACKLEY
CORT REPORTER

SAMANTHA PROCTOR
SECRETARY-BAILIFF

To Whom It May Concern,

I write to share my understanding and knowledge of events at St. Gregory's Academy in Elmhurst, PA, gained through my service on the Board of Advisors for the Academy from 2001-2003. Specifically, I wish to address certain claims that were made during this time against the Headmaster, Mr. Alan Hicks, and his assistant, Mr. Howard Clark.

I have over 25 years of legal experience, having begun my career as a Judge Advocate of the United States Marines Corps. Following my commission, I served two years as an Assistant Prosecutor in Ottawa Co. Oklahoma. In 1994 I was elected Associate District Judge of Ottawa Co. and I have continued to serve in this capacity to the present day.

In the fall of 2001 I enrolled my oldest son in St. Gregory's Academy. Through my visits to the school I became familiar with the operations of the Academy and with the Academy staff. Because of both my legal experience and personal interest in the school, I was invited by Mr. Hicks to serve on an Advisory Board for the Academy in the fall of 2001. This Board included a number of legal and educational professionals.

This Advisory Board was convened specifically to examine accusations that were beginning to circulate on the Internet regarding a religious community, the Society of St. John, members of which had served as the chaplains of the Academy during the 1998-1999 school years. These accusations, including claims of financial mismanagement and possible sexual misconduct, were being made by a man who had been hired by the Society of St. John after they left the Academy to begin their own operations. He had been a strong and enthusiastic supporter of the Society and had left a teaching job in New Jersey to join their operation. His accusations of misconduct only began after his position was eliminated by the Society leadership in the summer of 2001.

In his initial complains, there were no claims of misconduct relative to the Society of St. John's chaplaincy at the Academy. Furthermore, he stated in an email to an Academy parent in October 2001 that the boys were perfectly safe at the Academy, that Mr. Hicks was a very prudent man, and also that he was planning to enroll his own son in the Academy. Through this man had no official connection to the Academy, he had often visited the Society while they were in residence and had submitted an application for his son to attend for the 2002-2003 school term. However, his accusations against the Society continued to expand, and it began to be implied that improprieties may have occurred at St. Gregory's Academy. He also began to search for any information against the Society of St. John, including through contacts made

with Academy parents. As Mr. Hicks began to warn him about his actions and about making unsubstantiated claims, his hostility began to turn to Mr. Hicks.

In December, 2001, the Advisory Board met at length to discuss these events and to examine the policies of oversight and the daily procedures of the Academy. It was our conclusion that the policies and procedures of the Academy were sound and that the Academy was well run and provided a safe environment. As yet there were no specific allegations of impropriety on the part of anyone associated with the Academy, only insinuations from this man.

Then, in January 2002, a written complaint was received from a parent of a former student alleging that his son was given large amounts of liquor at least three nights a week during his junior and senior years by a priest of the Society. This letter furthermore stated that his son would then stay in this priest's room through the night before making his way back to the student quarters in the early morning. No claim was made of any sexual contact. Other claims were made of events and actions occurring between his son and this priest outside the Academy and following his son's graduation. Given their internal controls, the administration of the Academy had a reasonable skepticism regarding the possibility of the events described as occurring at the school. Nevertheless, this letter was turned over to the District Attorney's Office of Lackawanna Co. with a request for an investigation and a detective was assigned to investigate. In addition to this action, a letter was sent to all parents of students in residence during the chaplaincy of the Society requesting that any information regarding possible improprieties be sent to the Chancellor of the Diocese, Mr. James Early, who was in full cooperation with the District Attorney's Office. However, no negative reports were received following the mailing of this request.

The District Attorney's Office conducted an investigation, which included looking at records and interviewing former students and staff. This investigation was eventually dropped for lack of evidence. However, the boy in question and his parents did file a civil complaint against the Society of St. John and the Fraternity of St. Peter, the owners of the Academy. No claim was ever made, either in the original letter or the subsequent civil complaint, of any explicit sexual act occurring at the Academy. Nor was any claim ever made in the letter or the civil complaint of any negligence on the part of Mr. Hicks or Mr. Clark in regards to this matter.

Though there was no evidence leading to charges by the District Attorney's Office, the individual who began the original Internet campaign continued his public allegations, including the allegation that while at St. Gregory's the Society of St. John "plied boys with alcohol," and "lured them into bed." In response, Mr. Hicks wrote a substantial refutation of these accusations, which was sent to former Academy parents. This response, in turn, led this individual to write a series of attacks against Mr. Hicks and to claim that the administration of St. Gregory's was negligent in the care of the students. Included in these attacks was a claim that the Mr. Hicks and Mr. Clark were personally complicit in students drinking alcohol at the school. However, it was the judgment of the Board, that any claims of negligence were unjust and without any basis in fact. They were made by someone without any personal knowledge of the underlying facts and were clearly contradicted by the records of the school (which included

two cases of expulsion of students for bringing alcohol to the school) and by the testimony of former students, teachers, and dorm fathers.

It was the unanimous judgment of the Board that Mr. Hicks and Mr. Clark did an outstanding job in the education of young men. The policies of the Academy were sound and the enforcement of school policies by the administration, including the policy against any drinking by underage persons, was strong but reasonable. The response that Mr. Hicks and Mr. Clark made to the situation was appropriate and was consonant with the most rigorous standards of justice and moral integrity.

Sincerely,

Robert E. Reavis, II