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PUBLIC SUMMARY OF INVESTIGATION CONCLUSION MARINE LEADERSHIP ACADEMY December 23, 2021

The Chicago Public Schools Office of Inspector General has concluded an expansive investigation of sexual misconduct allegations and failure to report allegations at Marine Leadership Academy, a CPS grade 7 - 12 military academy affiliated with the United States Marine Corps.

FINDINGS OF THE INVESTIGATION

The investigation substantiated allegations of violations of other CPS policies against 13 individuals:

- 4 current and former MLA staff members
- The former MLA Principal
- 4 MLA Teachers
- 3 Military Instructors
- 1 member of the MLA Board of Governors

The investigation found that three individuals engaged in sexual misconduct:

- A Teacher member engaged in sexual intercourse with an 18-year-old student at MLA.
- A second Teacher engaged in a pattern of conduct with a different student that was sexually motivated with the intent to groom that student for sexual acts. However, the investigation did not determine whether the second staff member ever engaged in sexual acts.
- A Military Instructor made sexually-harassing comments to a twelfth-grade female student over the course of two years, making her uncomfortable. The staff member retaliated against that student when she reported the misconduct.

Additionally, four individuals were found to have violated the Guidelines Regarding Maintaining Professional Staff/Student Boundaries, five individuals communicated with students in violation of CPS policy, and seven individuals were found to have failed to report, or timely report, potential misconduct pursuant to their obligations under CPS policy.

SCOPE OF THE ALLEGATIONS AGAINST MLA STAFF MEMBERS & MEASURES TAKEN TO ENSURE STUDENT SAFETY DURING THE INVESTIGATION

The investigation examined allegations related to 29 individuals. The allegations included sexual abuse of students, nonsexual conduct that raised grooming concerns, failure to report potential inappropriate conduct, and other violations of CPS policies and guidelines. Among the parties investigated were:

- 16 current and former MLA staff members
- 8 MLA Teachers
- 3 Military Instructors
- A volunteer/member of the MLA Board of Governors
- A high-ranking director of military education at CPS

Since the investigation started in April 2019, the OIG has:

- Conducted more than 150 interviews with students, staff, alumni, and other potential witnesses;
- Compiled over 29,000 pages of documents through subpoenas and other sources, including 21 sets of cell phone records, police records, personnel files and reports from the CPS Law Department; and
- Reviewed over 151,000 pages of emails collected from MLA staff accounts.

Since 2019, the OIG has contacted the Illinois Department of Children and Family Services (DCFS) at least 22 times about allegations at MLA and collaborated with the Chicago Police Department on allegations that the department investigated. For reasons outside the control of CPS and the OIG, including that the investigations did not find sufficient evidence that criminal conduct had occurred, no criminal charges resulted from these allegations.

The OIG has also shared information internally about allegations against MLA staff members with stakeholder departments within CPS including the Office of Student Protections (OSP). As a matter of CPS procedure, the OIG, OSP and CPS' Law Department regularly coordinate to help inform decisions about overall objectives like whether staff need to be pulled from their jobs and the student supports that need to be administered. The OIG recommends that CPS pull staff members or block individuals at any point during an investigation when information indicates that student safety may be at risk.

CPS pulled two MLA staff members from their jobs in April 2019 at the start of the investigation. As additional evidence surfaced in the investigation, three additional MLA staff members were pulled in spring and summer of 2021, and a volunteer was blocked in January 2020.

REPORTING ON THE INVESTIGATION

On October 22, 2021, the OIG issued the first of five reports related to the MLA investigation. This report addressed the many unsubstantiated allegations against staff members.

On November 19, 2021, the OIG issued two reports addressing substantiated allegations of sexual misconduct or failures to report against a total of ten Marine Leadership Academy staff members, along with other CPS policy violations. The OIG also issued a <u>Public Summary of Investigation</u> regarding the investigation and those two reports.

On December 22, 2021, the OIG issued to the Board of Education its final two reports regarding the MLA investigation: one regarding policy violations involving additional staff members and one volunteer and the other addressing remaining issues from the investigation, including leadership failures uncovered at MLA and CPS Military Education. The findings of those final two reports are discussed below.

POLICY VIOLATIONS INVOLVING NON-SEXUAL CONDUCT

Multiple CPS policies protect students by limiting or outright prohibiting isolated interactions between adults and students. For instance, staff and volunteers are generally prohibited from texting students, connecting with students on social media, or giving students rides in personal vehicles.

The OIG investigates when a volunteer or staff member has allegedly violated such policies, even if the allegation is not clearly sexual in nature, to proactively support student safety. In the course of its investigation at MLA, the OIG found multiple instances of staff failing to comply with policies that define appropriate boundaries between adults and students, though evidence did not support that the misconduct was sexual in nature.

The OIG substantiated multiple policy violations involving **Subject K**, an MLA Board of Governors member who volunteered as a student mentor at MLA. Subject K was blocked in January 2020¹ after the Principal reported concerns regarding him. Subject K had numerous interactions with students alone and outside of school, including calling and texting students, taking students to meals, and going for walks with students.

Subject K's conduct raised concerns that he may have been grooming students, but the investigation did not establish that Subject K had groomed any student. The evidence did not establish that Subject K had engaged in conduct for the purpose of sexual abuse or any other misconduct of a sexual nature with a student. There was no allegation that he had touched a student in a sexual manner or attempted to do so. There was no evidence that he made any comments of a sexual nature to a student or exchanged texts of a sexual nature with a student.

However, the Principal (**Subject F**) violated the CPS Volunteer Policy by failing to ensure that Subject K had completed a fingerprinting and background check before he was allowed to engage with students at MLA. The CPS Volunteer Policy requires school principals to ensure that volunteers have the appropriate approvals, and the policy requires fingerprinting and a background check for any volunteer who has unsupervised interactions with students. The OIG found no evidence that Subject K had any previous criminal history, but it is concerning that a volunteer was given so much access to students without having completed a background check.

The Principal ultimately reported that Subject K had been texting with a student, but the Principal failed to report multiple prior instances of Subject K violating CPS rules and policies.

In the two reports most recently issued to the Board, the OIG also found that several other staff members had engaged in conduct that, while non-sexual in nature, still violated CPS rules and policies designed to keep students safe: A teacher texted with several students. Another teacher made an inappropriate comment to a student about the size of a condom he would need. Additionally, a counselor failed to report that Subject K was texting with a student.

MLA INVESTIGATION REMAINING ISSUES

A. SEXUAL MISCONDUCT, FAILURES TO REPORT, AND LEADERSHIP FAILURES

The evidence shows that MLA staff received training on CPS policies related to appropriate boundaries with and conduct towards students, as well as on their status as mandated reporters under both CPS policies and Illinois law. However, the

¹ The OIG's Public Summary of Investigation issued November 19, 2021, inadvertently indicated that Subject K was blocked in January 2021, rather than January 2020.

investigation revealed that multiple individuals at MLA engaged in inappropriate interactions with students and MLA staff members failed to report those violations of CPS policies.

The failures to report went to the highest levels at MLA, as Subject F failed to report several instances of prohibited conduct between CPS-affiliated adults at the school and students. Subject F also contributed to a dysfunctional and divisive environment, which played a role in whether MLA staff members reported violations of CPS policies at all and how the reporting was handled (or mishandled).

B. CPS MILITARY EDUCATION LEADERSHIP FAILURES AND MILITARY INSTRUCTORS' INAPPROPRIATE COMMUNICATIONS WITH STUDENTS

The investigation revealed issues with the Retired uniformed Marines who were Military Instructors at MLA, as well as failures by CPS Military Education leaders in oversight over those Military Instructors.

Subject N, the high-ranking CPS director for military instruction told the OIG that it was "not [his] business to dig into" why members of the school's military staff were pulled and that he did not ask for updates for allegations against MLA staff because "it [was] not [his] concern."

Additionally, military staff at MLA were responsible for the majority of improper communications with students. Phone records of more than a dozen MLA staff members were cross-referenced against contact information for over 60 former and current students. Though there were some cell phone communications between MLA's civilian staff members and students, most of the communications occurred between Military Instructors and students.

There were no allegations, and the OIG found no evidence, that any of the communications between Military Instructors and students were sexual.

However, several MLA students lied to the OIG about whether they had cell phone communications with MLA staff members while they were students. MLA military staff also denied communicating with students until confronted with the phone records.

C. INVESTIGATION DID NOT ESTABLISH A CONNECTION BETWEEN A STUDENT'S SUICIDE AND STAFF MISCONDUCT

On September 23, 2021, the OIG received an allegation that a student's suicide was prompted by sexual abuse on the part of an MLA staff member. There was no evidence to substantiate this allegation. There was also an allegation that MLA staff may have failed to strictly follow their own, or CPS', procedures related to expressions of suicidal ideation in relation to that student. However, the evidence showed that the student received support and counseling.