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**Response to Press Statement Containing False Statements Issued by
Horace Mann School On May 24th, 2013**

On May 24, 2013, the Horace Mann School in New York City (HM) published a press statement containing false statements in an effort to divert attention from the fact that the School and its administration were rejecting repeated requests by numerous adult survivors of child sexual abuse at Horace Mann that an independent investigation into the abuse and the School's knowledge of the abuse be conducted.

Nearly a year ago, a number of our 25 clients — all of whom are survivors of childhood sexual abuse at Horace Mann — urged the school to do an independent investigation. On April 22, 2013, a number of survivors of sexual abuse at Horace Mann and we as their lawyers, held a press conference once again to urge Horace Mann to conduct "an immediate, independent and transparent investigation into the worst case of child sexual abuse in an American school in recent history."

Last Friday afternoon (May 24, 2013), Horace Mann publicly announced its response. Horace Mann refused to do an investigation. Instead, Horace Mann stated:

"Finally, the Board of Trustees has accepted the proposal of Commonwealth Mediation that Commonwealth Mediation prepare an independent summary of the reported abuses, without identifying the survivors. The mediators involved have heard from thirty-one alumni/ae who described in painful detail the inexcusable conduct of their teachers and administrators that occurred between seventeen and fifty-one years ago. Given the passage of time, most of the abusers are either dead or mentally infirm; the remainder, we understand, are unwilling to respond to the allegations, and the School does not have the authority to compel these individuals to do so. It is these reports heard by the mediators -- shared privately and in person by survivors -- that provide us the greatest insight

into what happened. The Board of Trustees and Head of School have agreed to make the summary report available as soon as practicable.”

The "painful detail" referenced by Horace Mann were victim impact statements made by our clients at the mediation. These statements were enormously difficult and gut-wrenching. They took a high emotional toll on each of our clients many of whom revealed facts that they had kept hidden for decades, even from people who are closest to them. Our clients made those statements in reliance upon express written and oral representations that everyone involved in the mediation process would keep these statements and the facts presented in them confidential. That is not to say that our clients do not want transparency or do not want the school or an investigator to hear of their abuses. To the contrary, they want the facts and details of the abuse to be absorbed and analyzed in a full independent process that includes an examination of school records and interviews of not only abusers but of school board members, administrators and teachers who observed and/or knew of the abuse and either took no action or actively took steps to ensure that the abuses stay hidden.

Notwithstanding this history, Horace Mann announced to the world on Friday afternoon that it would publish a report summarizing our clients' statements. This “summary” is a betrayal. It was not what the survivors had asked for or wanted. It is contrary to the representations and agreements made to and with the survivors.

This summary is also contrary to what the survivors had been told would be considered by the Board of Trustees at Horace Mann.

On March 28th, Paul Finn of Commonwealth Mediation wrote to us, stating: “Tom Kelly has just informed me that the special Board Meeting scheduled for tomorrow, March 29, 2013, has been postponed because not enough Board members could appear in person because of the religious holidays and/or school vacations. Mr. Kelly has informed us that the full Board will meet on Tuesday, April 23, 2013 in New York City. Brian and I plan on attending. On another note Brian and I will not be doing the

investigation. We are neutrals and will remain the same. We will ask the Board to conduct an independent investigation as part of our recommendations, but we will not ask the Board to hire us to do that investigation.”

After Horace Mann issued its press release last Friday, we contacted Mr. Finn to find out whether or not Horace Mann's announcement that Commonwealth Mediation, his firm, had agreed to prepare "an independent summary of the reported abuses," that would be based upon what had been "heard by the mediators -- shared privately and in person by survivors" at the mediation. In response to our inquiry Mr. Finn wrote to us on May 27th stating: “We have not been hired to do anything.”

Notably, we have also asked Horace Mann’s lawyers to verify the facts pertaining to Commonwealth’s role going forward insofar as a report was concerned. We have not received any response.

In light of Mr. Finn's response, we believe it is clear that Horace Mann has chosen falsely to state to the world that the mediators would prepare an “independent” report of what they learned at the mediation, knowing that no such report will ever be prepared. We believe this is a callous attempt to deflect attention from the fact that Horace Mann is continuing to refuse to conduct an independent investigation — an investigation which could reveal not only the extent of the abuse but also identify school administrators and board members who knew about the abuse but did nothing to stop it or who actively threatened children or their families to keep the reports and abuse hidden.

Horace Mann has attempted to posture itself as caring and compassionate to the survivors but they have only increased the suffering of survivors by publishing a flagrantly false statement. Such institutional deception and ongoing bad faith has served only to exacerbate and reopen the deep anxieties and feelings of those who are the victims and continue to struggle every day to survive the abuse that altered their lives.

Our clients were Horace Mann students. They were sexually abused by Horace Mann teachers at the Horace Mann School. Horace Mann's refusal to conduct an independent, full, and transparent investigation – including into the School's own actions and knowledge – and Horace Mann's actions in putting out a misleading press statement is a cause for further shame. It has aggravated the harm and suffering that these survivors have been forced to endure at the Horace Mann school.

Since Horace Mann's press statement is on Horace Mann's website, we would hope that Horace Mann would have the decency to place our response alongside its statement for the Horace Mann community to see as well. Horace Mann should also issue a retraction and an apology to the survivors for the false and misleading statements it has made which has caused them such pain.

Attorney Gloria Allred and Attorney Mariann Wang
May 30, 2013