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Statement of Gloria Allred

Recently we filed a lawsuit in the Superior Court in Ventura on behalf of our client, Jane Doe, against Defendant Doe 1. Later we sought and were granted by the court permission to amend our lawsuit to provide the true name of Defendant Doe 1. Yesterday, we filed our amended lawsuit, which reveals that Defendant Doe 1 is, in fact, the Thacher School, a well-known, private, residential school in Ojai, California.

Thacher has been in the local and national news in the last few years, because of allegations from a number of students going back decades that they had been victims of either rape, sexual assault, or inappropriate conduct by certain faculty members and/or administrators when they attended the school.

In addition, some of the accusers alleged that when they reported their allegations, they were either retaliated against or responded to in a manner that was inappropriate and left them feeling unprotected.

When the scandal became public, Thacher hired the law firm of Munger Tolles & Olson (“Munger Tolles”) to do an investigation and provide a report to the Board of Thacher and the public. The 91-page report, which was released last year, covered issues of “faculty sexual misconduct,” Thacher’s handling of “student sexual misconduct,” and it made “recommendations for corrective actions.”

It detailed numerous alleged sexual incidents of victimization of students and the failure of the school to protect them or act in an appropriate matter when the incidents were reported to them.

After the report was published, it was criticized by some former alumni and supporters of the school who alleged that the report was incomplete. As a result of the criticism, a supplemental report was promised, but never provided.

After the Munger Tolles report was published, our client, Jane Doe, contacted Munger Tolles and reported her allegation of sexual abuse to them. In addition, she made a report to law enforcement.

She then retained my law firm (Allred, Maroko and Goldberg) to learn her legal rights and options and to file a lawsuit to vindicate her rights. Her goal was and is to make Thacher accountable for their failure to protect her from childhood sexual abuse at Thacher and the school's failure to respond appropriately when she reported to the school the misconduct that she suffered when she was a student there.

That is why we filed a lawsuit for her against Thacher. In our complaint, we allege:

- Negligent supervision and retention
- Negligence per se
- Negligent failure to warn, train, or educate students
- Sexual harassment
- Intentional infliction of emotional distress
- Sexual battery

In our lawsuit, we also allege that at the end of plaintiff's sophomore year, after plaintiff's repeated complaints about the aforementioned sexual abuse, the Thacher School told plaintiff she was not welcome to return the following school year.

We are seeking damages including punitive damages in an amount to be proven at trial. To our knowledge, it appears that this may be the first lawsuit filed by a former student of Thacher who alleged sexual abuse at the school.

We are very proud of our client and the courage she has demonstrated in deciding to file this lawsuit against this very powerful and prestigious school.

She hopes that her case will assist both her and other former students in learning the truth about why Thacher failed so many of its students.

We look forward to asserting, protecting, and vindicating the rights of our client, Jane Doe, in a California court of law.

Gloria Allred
Representing Jane Doe
October 12, 2022

The case number for the original complaint that we filed is 56-2022-00569257-CU-MC-VTA, and can be found on the website of the Superior Court of California, County of Ventura.