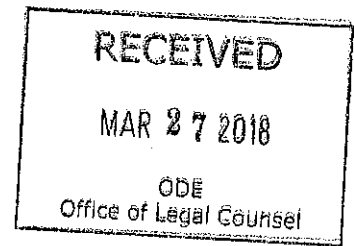


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March 26, 2018

VIA UPS NEXT DAY AIR

Ms. Diane Lease, Esq.
Chief Legal Counsel
Ohio Department of Education
25 South Front Street
Columbus, OH 43215

Re: Youngstown City School District

Dear Ms. Lease:

As you requested, we have looked into the complaint (“Complaint”) made by the former Chair (“Former Chair”) of the Youngstown Academic Distress Commission to the Ohio Department of Education (“DOE”) on or about February 28, 2018, alleging that the Administrator of the Youngstown City School District (the “Administrator”) may have engaged in inappropriate conduct with respect to a female attorney and/or a job applicant. The Former Chair declined to identify by name either the female attorney or the job applicant.

In conducting the investigation, we interviewed the female attorney whom we believe may have been the individual that the Former Chair was describing (“Ms. Doe”). Ms. Doe stated that she has no complaints of any inappropriate conduct by the Administrator and she did not wish to make any such complaints. She characterized her relationship with the Administrator as a professional relationship. With respect to the concern raised by the Former Chair of any inappropriate behavior by the Administrator toward her, Ms. Doe said there was none.

We also interviewed the Administrator. He denies having engaged in any inappropriate or unprofessional behavior with Ms. Doe, with any other female attorney, or with any job applicant. He is unaware of any facts that would support the allegations in the Complaint. The Administrator also made clear that he had not received any complaints, formal or informal, alleging any inappropriate conduct or harassment, from any member of his staff or from any job applicant.

March 26, 2018

Page 2

The identity of the alleged job applicant is not known, and it is my understanding that the Former Chair has indicated to the DOE that, to the best of his knowledge, the job applicant did not wish to make any complaint.

Based on the information available, we have no reason to believe that any inappropriate conduct occurred as alleged in the Complaint. We therefore are closing the investigation with a finding of no inappropriate activity.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd H. Lebowitz", with a stylized flourish extending to the right.

Todd H. Lebowitz