

Title IX Investigative Report
Regarding Allegations of Sexual Harassment
Conducted By Southern Connecticut State University

Report Prepared By:

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and
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Shipman & Goodwin LLP

February 23, 2021

Title IX Investigative Report

Name of Complainant: 1-210(b)(11)

Name of Respondent: Byron Lembo-Frey

Names of investigators: Christopher E. Engler and Sarah E. Gleason, Shipman & Goodwin LLP

I. Procedural Steps

A. **Date formal complaint received:** October 29, 2020

B. **Date notice of allegations was sent to the parties:** November 12, 2020

C. **Interviews of witnesses and parties:**

Name of Witness/Party	Date of Interview	Others Present at Interview
1-210(b)(11)	11/20/20	Cathy Christy (Advisor)
Desiree Parker	11/20/20	
Jeffrey Payne	11/24/20	
Kevin Lenhart	11/24/20	
Erin Duff	11/24/20	Chris Piscitelli (Union Representative)
Michelle Raccio	12/2/20	
Byron Lembo-Frey	1/13/21	Attorney Robert Vontell (Advisor)

D. **Types of evidence reviewed:**

- Complaint
- Investigative interviews of parties and witnesses
- Statement from Desiree Parker
- Statement from Jeffrey Payne regarding Byron Lembo-Frey's work assignments
- Statement from Erin Duff
- Statement from Michelle Raccio

E. **Date evidence was sent to the parties and advisors for inspection and review and date by which written response was required:** Evidence was sent to the parties on January 15, 2021 with written responses due by January 25, 2021. On January 24,

2021, [REDACTED] requested and received an extension until January 29, 2021 to submit a written response.¹

- F. **Date written responses were received from each party and how those responses, if any, were considered:** Mr. Lembo-Frey's advisor, Attorney Robert Vontell, provided a written response via email on January 22, 2021. His response is referenced and incorporated in the summary of relevant evidence. [REDACTED] provided a written response via email on January 30, 2021. She clarified that Mr. Lembo-Frey asked her to be in a photo shoot, not a video shoot. This is reflected throughout the report.

II. Summary of Relevant Evidence

On October 29, 2020, the Office of Diversity and Equity Programs at Southern Connecticut State University ("SCSU") received a complaint from [REDACTED], an undergraduate student (the "Complaint"). The Complaint alleges that the respondent, Byron Lembo-Frey, a custodian employed by SCSU, engaged in stalking behaviors towards [REDACTED], consistently waited for her at her workplace or dormitory, stared at her, and persistently tried to engage her in conversation over a three-year period. An investigation was conducted by Attorneys Christopher E. Engler and Sarah E. Gleason of Shipman & Goodwin LLP, in compliance with the federal regulations implementing Title IX, 34 C.F.R. § 106, *et seq.*

Mr. Lembo-Frey was notified of the investigation via a written notice of allegations. He declined Union representation, and instead retained his own personal attorney, Robert Vontell. During the course of the investigation, the investigators interviewed both [REDACTED] and Mr. Lembo-Frey; two SCSU students who worked at Dunkin Donuts with [REDACTED] at various times relevant to the investigation; [REDACTED] supervisor at Dunkin Donuts, Desiree Parker; [REDACTED] former Residence Hall Director, Erin Duff; and Mr. Lembo-Frey's manager and the Associate Director of Custodial and Grounds, Jeff Payne. Attorney Vontell was present during Mr. Lembo-Frey's interview. [REDACTED] advisor, Cathy Christy, was present during her interview. Because of the Covid-19 pandemic, all interviews were conducted via videoconference or telephone.

Both parties were provided an opportunity to review all evidence collected through the investigation that relates to the allegations in the Complaint, and both parties provided a written response to that evidence. The investigation focused on compiling both inculpatory and exculpatory evidence relevant to the allegations in the Complaint.

The Complaint makes numerous allegations regarding inappropriate conduct by Mr. Lembo-Frey directed towards [REDACTED] spanning over a three-year period. The different time periods of alleged harassment are discussed below, and Mr. Lembo-Frey's response to the Complaint is discussed at the end of this report.

¹ Mr. Lembo-Frey submitted his written response prior to [REDACTED] request for an extension and thus Mr. Lembo-Frey did not require an extension of time.

Fall 2018 Allegations

1-210(b)(11) reported that she first encountered Mr. Lembo-Frey during the Fall 2018² semester when she was a student worker³ at the Dunkin Donuts located in the Adanti Student Center on SCSU's campus ("Dunkin"). According to 1-210(b)(11), she was working a Saturday shift during the Fall 2018 semester. 1-210(b)(11) recalled that the first memory of Mr. Lembo-Frey is when he approached her while she was behind the counter at Dunkin and he asked her if she would be in his photo shoot for women newly out of relationships. 1-210(b)(11) stated that Mr. Lembo-Frey said he was specifically looking for women with red hair like 1-210(b)(11). When 1-210(b)(11) asked Mr. Lembo-Frey if he was a student, he did not directly answer the question and gave a vague response. 1-210(b)(11) reported this behavior to her manager, Rashida, who told her to go to the back room whenever Mr. Lembo-Frey approached the counter and a different employee could take his order. 1-210(b)(11) stated that after the initial comment about the photo shoot, Mr. Lembo-Frey came to Dunkin on almost every Saturday that she was working and would routinely order chocolate milk. 1-210(b)(11) said she began going to the back room when Mr. Lembo-Frey approached Dunkin, but he would wait for her to come out so he could attempt to talk to her. He would try to engage her in conversation and ask questions about her favorite hobbies, interests, and movies. 1-210(b)(11) reported that Mr. Lembo-Frey would loiter around Dunkin and wait for her to return to her register in an attempt to further engage in conversation. This pattern continued through the end of the semester, after which 1-210(b)(11) no longer worked the Saturday shift.

During this time, 1-210(b)(11) worked at Dunkin with another student worker, 1-210(b)(11). 1-210(b)(11) spoke with the investigators and corroborated 1-210(b)(11) version of events. He recalled 1-210(b)(11) telling him about Mr. Lembo-Frey's comment about the photo shoot for women newly out of relationships and he advised 1-210(b)(11) to go to the back room with Mr. Lembo-Frey approached so that he could serve him and not 1-210(b)(11). 1-210(b)(11) reported that Mr. Lembo-Frey would come around Dunkin multiple times during each Saturday shift when 1-210(b)(11) was working. 1-210(b)(11) thought that Mr. Lembo-Frey was a graduate student, as he had heard Mr. Lembo-Frey previously mention writing a thesis.

Fall 2019 Allegations

1-210(b)(11) reported that she next encountered Mr. Lembo-Frey during the Fall 2019⁴ semester when she 1-210(b)(17), a residential hall at SCSU. 1-210(b)(11)

² While the Complaint states Fall 2018, during her interview 1-210(b)(11) recalled these events as having occurred during the Spring 2019 semester. 1-210(b)(11), 1-210(b)(11) co-worker at Dunkin during the time in question, remembers the events occurring during the Fall 2018 semester. The investigators do not consider the precise semester in which the events occurred to be relevant for their analysis. For purposes of this report, the investigators will refer to it as the Fall 2018 semester.

³ 1-210(b)(11) was not employed by SCSU in this capacity. Instead, she was an employee of Sodexo, which operates Dunkin, or its predecessor Chartwells.

⁴ The Complaint states that these events happened during the Spring 2019 semester. However, both 1-210(b)(11) and her Resident Hall Director, Erin Duff, confirmed that these events happened during the Fall 2019 semester when 1-210(b)(11) was 1-210(b)(17).

1-210(b)(11) stated that she saw Mr. Lembo-Frey two or three times in common areas of 1-210(b)(17) in September 2019. According to 1-210(b)(11), she observed Mr. Lembo-Frey sitting or wandering around the common areas next to 1-210(b)(11) dorm room. The common area also contained a bulletin board that displayed 1-210(b)(11) picture, room number, and class schedule. 1-210(b)(11) noted that, although it was common to see custodians in 1-210(b)(17), Mr. Lembo-Frey did not have cleaning supplies or anything that indicated that he was working in his custodian position at the times she saw him near her dorm room.

1-210(b)(11) reported that she felt as though Mr. Lembo-Frey was waiting for her to leave her dorm room and enter the common areas. 1-210(b)(11) stated that she felt unsafe during these encounters and quickly left the area where Mr. Lembo-Frey was either by returning to her dorm room or leaving the building. 1-210(b)(11) also reported that Mr. Lembo-Frey approached her in the office area of 1-210(b)(17) and tried to make small talk with her, which made her uncomfortable. After encountering Mr. Lembo-Frey multiple times in 1-210(b)(17), 1-210(b)(11) went to the 1-210(b)(17) Residence Hall Director, Erin Duff, with her concerns surrounding Mr. Lembo-Frey and asked that he be removed from duty at 1-210(b)(17). 1-210(b)(11) thought that Ms. Duff made a report and Mr. Lembo-Frey was reassigned as a result. However, after she filed this Complaint, 1-210(b)(11) learned that Ms. Duff had not filed a report and Mr. Lembo-Frey was reassigned from 1-210(b)(17) in the ordinary course.

Ms. Duff confirmed that 1-210(b)(11) came to her in September 2019 regarding concerns she had with Mr. Lembo-Frey and how his behavior made her uncomfortable. According to Ms. Duff in both her interview and her written statement, 1-210(b)(11) reported that Mr. Lembo-Frey would continuously try to speak to her while he was in 1-210(b)(17).

Although 1-210(b)(11) did not name Mr. Lembo-Frey, Ms. Duff knew which custodian 1-210(b)(11) 1-210(b)(11) was referencing because Ms. Duff had similar interactions with him. According to Ms. Duff, on multiple occasions Mr. Lembo-Frey tried to engage Ms. Duff in conversation with her while cleaning her office in 1-210(b)(17). Ms. Duff stated that she gave 1-210(b)(11) suggestions on how to politely move on from the conversation and she did not speak to 1-210(b)(11) 1-210(b)(11) again about this issue until after the Complaint was filed.

It appears that Mr. Lembo-Frey did not work in 1-210(b)(17) after September 2019. Jeffrey Payne, Associate Director of Custodial and Grounds, informed the investigators via email that Mr. Lembo-Frey was assigned to temporary overtime in 1-210(b)(17) between August 26, 2019 and September 2, 2019, and no longer had an overtime assignment in 1-210(b)(17) after that date.

Fall 2020 Allegations

1-210(b)(11) reported that she next encountered Mr. Lembo-Frey during the Fall 2020 semester when she worked the closing shift at Dunkin on Monday and Wednesday evenings with her student co-worker, 1-210(b)(11). 1-210(b)(11) was interviewed by the investigators and also provided a written statement. Both 1-210(b)(11) and 1-210(b)(11) stated that during the Fall 2020 semester, Mr. Lembo-Frey appeared at Dunkin nearly every Monday and Wednesday evening between 4:00 p.m. and 6:00 p.m. 1-210(b)(11) noted that if she took his

order, which was usually a large iced green tea matcha,⁵ his demeanor changed as soon as he saw [REDACTED], and he would focus all of his attention on [REDACTED] and try to speak with her. [REDACTED] reported that Mr. Lembo-Frey would make comments about [REDACTED] appearance, referring to her as “so beautiful” and “so pretty.” According to [REDACTED], Mr. Lembo-Frey would often loiter around Dunkin, apparently waiting for [REDACTED] to be available or to begin her shift before he placed his order. According to [REDACTED] whenever she interacted with Mr. Lembo-Frey, he would make small talk with her, including asking about her interests and movie preferences. She reported that when she did not engage in conversation with Mr. Lembo-Frey, he would follow her to other registers to try to continue to talk to her even if she was helping a different customer. [REDACTED] reported that on one occasion⁶, after taking Mr. Lembo-Frey’s order, [REDACTED] left the register to wash her hands. When she returned, Mr. Lembo-Frey was still at the counter waiting for her, and he said to her “may a beautiful woman have a beautiful day.”

Both [REDACTED] and [REDACTED] also stated that Mr. Lembo-Frey typically sat at a table in the Student Center that was angled towards Dunkin from where he could watch Dunkin. They believed that he was waiting for [REDACTED] to become available so he could approach the counter and order from her. During these times, [REDACTED] stated that he did not have a laptop or notebook at his table with him. [REDACTED] stated that she again began hiding in the back room of Dunkin when Mr. Lembo-Frey was present so as to avoid interactions with him. [REDACTED] and [REDACTED] also began parking next to each other in a location close to the exit of Dunkin so that [REDACTED] could quickly escort [REDACTED] to her after their shift ended. [REDACTED] would wait for [REDACTED] to drive away to ensure her safety. [REDACTED] noted that when she worked at Dunkin on days that [REDACTED] did not work, she did not see Mr. Lembo-Frey at Dunkin.

During the Fall 2020 semester, [REDACTED] also worked the morning shift at Dunkin on Tuesdays and Thursdays. [REDACTED] reported that she often took her morning break at the dining hall in Connecticut Hall. [REDACTED] reported that on two occasions she encountered Mr. Lembo-Frey while he was working in Connecticut Hall and he stared at her constantly while she was there. She stated that after this happened twice she stopped going to Connecticut Hall during her morning break because Mr. Lembo-Frey made her so uncomfortable. Mr. Payne confirmed that Mr. Lembo-Frey worked an overtime assignment in Connecticut Hall on weekdays from 7:00 a.m. to 11:00 a.m. from September 7, 2020 to September 25, 2020 and from October 12, 2020 to October 16, 2020. However, Mr. Payne stated that SCSU custodians such as Mr. Lembo-Frey were never assigned work inside the Connecticut Hall dining hall itself, as the food-service vendor was responsible for cleaning that area. It remains unclear why Mr. Lembo-Frey may have been in the dining hall area on the occasions that [REDACTED] observed him watching her.

⁵ While [REDACTED] and [REDACTED] have differing recollections of Mr. Lembo-Frey’s usual drink order, Mr. Lembo-Frey confirmed that he ordered both milk and a green tea drink from Dunkin.

⁶ The Complaint identifies this incident as occurring on October 21, 2020.

1-210(b)(11) also reported another incident that occurred during the Fall 2020 semester, although she does not know if it involved Mr. Lembo-Frey. On one Tuesday morning during the Fall 2020 semester, 1-210(b)(11) left her backpack in an unlocked locker in an employee-only area of the Student Center. This was a common practice for the student workers in the Student Center. When she returned, she noticed that the contents of her backpack had been moved around and that her wallet, which contained her identification with her name and address, was open. Nothing was removed or stolen from her backpack. The investigators did not identify any evidence connecting Mr. Lembo-Frey to this incident.

According to 1-210(b)(11) she became increasingly uncomfortable with Mr. Lembo-Frey's behavior and she began feeling as though she did not want to go to work at Dunkin'. As a result, 1-210(b)(11) reported her concerns about his behavior to her supervisor, Desiree Parker, Retail Operation Director, on October 26, 2020. Ms. Parker is employed by Sodexo. Ms. Parker then reported the situation to Brad Crerar, SCSU's Director of the Student Center. Ms. Parker provided the investigators with a narrative of what happened on October 26, 2020, including information that 1-210(b)(11) communicated to her at the time. 1-210(b)(11) told Ms. Parker about her previous interactions with Mr. Lembo-Frey in 2018 and his request that she be in his photo shoot for women with red hair newly out of relationships. 1-210(b)(11) also reported to Ms. Parker that Mr. Lembo-Frey appeared at Dunkin' consistently during her shifts both in 2018 and in 2020, and that although she tried to avoid interactions with him, he would wait until she was available and attempt to speak with her. 1-210(b)(11) also told Ms. Parker about her interactions with Mr. Lembo-Frey in 1-210(b)(17) when she was a 1-210(b)(17) 1-210(b)(17) in 2019. 1-210(b)(11) statement to Ms. Parker is consistent with her statement to the investigators. In addition, Ms. Parker informed the investigators of "weird" interactions she had with Mr. Lembo-Frey and noted that he appeared to lack social cues. She also reported that she has seen him loitering around Dunkin'.

Mr. Lembo-Frey's Response to the Allegations

Mr. Lembo-Frey provided the investigators with information on his background at SCSU and confirmed that he has never been a student at SCSU but has been employed as a custodian since 2011. For the past five years, Mr. Lembo-Frey has worked the 2:00 p.m. to 10:00 p.m. shift on weekdays at SCSU. He also often worked overtime on other shifts.

Mr. Lembo-Frey stated that he does not recall any of the specific incidents reported in the Complaint. With regard to the allegations from 2018, he stated that, although he did not typically work on Saturdays, he would go to the Student Center on some weekends to read and write. He stated that he does not remember ever interacting with 1-210(b)(11) at any point. However, he admitted that he might have seen her at Dunkin' and that he interacts with numerous people at Dunkin'. According to Mr. Lembo-Frey, prior to the campus being closed due to the ongoing pandemic, he went to Dunkin' or another food venue in the Student Center nearly every day. He stated that he would typically engage in small talk with the workers at Dunkin' but does not recall trying to talk to one employee specifically. Mr. Lembo-Frey also told the investigators that during the Fall 2020 semester, he went to Dunkin' during his breaks

and would wait at Dunkin for the “sanitation period”⁷ from 4:00-4:30 p.m. to be over so that he could be first in line when Dunkin reopened. Although Mr. Lembo-Frey agreed that he spent a lot of time in the Student Center, he stated that he typically sat in the very back of the Student Center while using his computer and that he could not see Dunkin from his location. This statement conflicts with [REDACTED] observations that Mr. Lembo-Frey often sat at a table near and within view of Dunkin.

Mr. Lembo-Frey also did not recall ever mentioning a photo shoot for red haired women newly out of relationships. He confirmed that photography is a hobby of his and that he engages in freelance photography, but he stated he had never done a project on red haired women newly out of relationships. When asked if he made the alleged comment “may a beautiful woman have a beautiful day” or anything similar, he stated “absolutely not.” He further stated that that type of comment is not something he would say in general.

When asked if he had any interactions with [REDACTED] in [REDACTED], Mr. Lembo-Frey responded “absolutely not.” He also stated that he had never spoken to the Residence Hall Director, Ms. Duff. Although he admitted he would clean Ms. Duff’s office while he was assigned to [REDACTED], he stated that he never encountered her in the office. However, when asked if he knew who the Residence Hall Director was, Mr. Lembo-Frey again responded “absolutely not.” This response, in light of Ms. Duff’s statements about having multiple conversations with Mr. Lembo-Frey in her office, calls into question Mr. Lembo-Frey’s denials.

Mr. Lembo-Frey also stated that he worked in [REDACTED] “extremely rarely.” He further stated that he only worked there on move-in day or move-in weekend in August 2019. The investigators note that Jeffrey Payne reported that Mr. Lembo-Frey worked in [REDACTED] on eight days in August and September 2019.

After the evidence was sent to Mr. Lembo-Frey and his attorney advisor for inspection and review, his attorney submitted the following written response on his behalf:

1. *Sometimes around 7:30 p.m. at the Dunkin’ s, Dunkin Donuts would give away free donuts. This is the reason that Byron would often go to the Dunkin Donuts around this time. Byron does not remember if [REDACTED] ever gave him a free donut.*
2. *Byron was never told by any manager or employee at Dunkin’ Donuts that his comments, actions, or presence made anyone uncomfortable there.*
3. *When Danielle McMullen, the head union steward, told him that he could go to the student center, she told him that Byron was allowed to respond to the attempts of Dunkin Donuts employees to talk to him.*

⁷ The sanitation period provided employees with an opportunity to deeply clean the dining areas to limit the spread of COVID-19.

Because this information was raised for the first time in Mr. Lembo-Frey's written response to the evidence, the investigators were unable to confirm whether Dunkin gave away free doughnuts during this time. The investigators note that no witness previously reported that Mr. Lembo-Frey went to Dunkin around 7:30 p.m. Mr. Lembo-Frey previously stated during his interview that he often went to Dunkin around 4:30 p.m. to be first in line when Dunkin reopened after the "sanitation period." In addition, [1-210(b)(11)] reported that Mr. Lembo-Frey often lingered near Dunkin between 4pm and 6pm.

The context and relevance of Mr. Lembo-Frey's comment regarding his "head union steward" are unclear. During his interview, Mr. Lembo-Frey and his attorney discussed a previous disciplinary issue involving his union, but that issue was beyond the scope of this investigation.

Dated: February 23, 2021

Redaction Log

Total Number of Redactions in Document: 123

Redaction Reasons by Page

Page	Reason	Description	Occurrences
2	1-210(b)(11)	Names or addresses of students enrolled in any public school or college without the consent of each student whose name or address is to be disclosed who is eighteen years of age or older and a parent or guardian of each such student who is younger than eighteen years of age provided this subdivision shall not be construed as prohibiting the disclosure of the names or addresses of students enrolled in any public school in a regional school district to the board of selectmen or town board of finance as the case may be of the town wherein the student resides for the purpose of verifying tuition payments made to such school	2
3	1-210(b)(11)	Names or addresses of students enrolled in any public school or college without the consent of each student whose name or address is to be disclosed who is eighteen years of age or older and a parent or guardian of each such student who is younger than eighteen years of age provided this subdivision shall not be construed as prohibiting the disclosure of the names or addresses of students enrolled in any public school in a regional school district to the board of selectmen or town board of finance as the case may be of the town wherein the student resides for the purpose of verifying tuition payments made to such school	14
4	1-210(b)(11)	Names or addresses of students enrolled in any public school or college without the consent of each student whose name or address is to be disclosed who is eighteen years of age or older and a parent or guardian of each such student who is younger than eighteen years of age provided this subdivision shall not be construed as prohibiting the disclosure of the names or addresses of students enrolled in any public school in a regional school district to the board of selectmen or town board of finance as the case may be of the town wherein the student resides for the purpose of verifying tuition payments made to such school	32
4	1-210(b)(17)	Educational records which are not subject to disclosure under the Family Educational Rights and Privacy Act 20 USC 1232g	2

Redaction Log

Page	Reason	Description	Occurrences
5	1-210(b)(11)	Names or addresses of students enrolled in any public school or college without the consent of each student whose name or address is to be disclosed who is eighteen years of age or older and a parent or guardian of each such student who is younger than eighteen years of age provided this subdivision shall not be construed as prohibiting the disclosure of the names or addresses of students enrolled in any public school in a regional school district to the board of selectmen or town board of finance as the case may be of the town wherein the student resides for the purpose of verifying tuition payments made to such school	25
6	1-210(b)(11)	Names or addresses of students enrolled in any public school or college without the consent of each student whose name or address is to be disclosed who is eighteen years of age or older and a parent or guardian of each such student who is younger than eighteen years of age provided this subdivision shall not be construed as prohibiting the disclosure of the names or addresses of students enrolled in any public school in a regional school district to the board of selectmen or town board of finance as the case may be of the town wherein the student resides for the purpose of verifying tuition payments made to such school	32
7	1-210(b)(11)	Names or addresses of students enrolled in any public school or college without the consent of each student whose name or address is to be disclosed who is eighteen years of age or older and a parent or guardian of each such student who is younger than eighteen years of age provided this subdivision shall not be construed as prohibiting the disclosure of the names or addresses of students enrolled in any public school in a regional school district to the board of selectmen or town board of finance as the case may be of the town wherein the student resides for the purpose of verifying tuition payments made to such school	10
7	1-210(b)(17)	Educational records which are not subject to disclosure under the Family Educational Rights and Privacy Act 20 USC 1232g	2

Redaction Log

Page	Reason	Description	Occurrences
8	1-210(b)(11)	Names or addresses of students enrolled in any public school or college without the consent of each student whose name or address is to be disclosed who is eighteen years of age or older and a parent or guardian of each such student who is younger than eighteen years of age provided this subdivision shall not be construed as prohibiting the disclosure of the names or addresses of students enrolled in any public school in a regional school district to the board of selectmen or town board of finance as the case may be of the town wherein the student resides for the purpose of verifying tuition payments made to such school	3
9	1-210(b)(11)	Names or addresses of students enrolled in any public school or college without the consent of each student whose name or address is to be disclosed who is eighteen years of age or older and a parent or guardian of each such student who is younger than eighteen years of age provided this subdivision shall not be construed as prohibiting the disclosure of the names or addresses of students enrolled in any public school in a regional school district to the board of selectmen or town board of finance as the case may be of the town wherein the student resides for the purpose of verifying tuition payments made to such school	1

Redaction Log

Redaction Reasons by Exemption

Reason	Description	Pages (Count)
1-210(b)(11)	Names or addresses of students enrolled in any public school or college without the consent of each student whose name or address is to be disclosed who is eighteen years of age or older and a parent or guardian of each such student who is younger than eighteen years of age provided this subdivision shall not be construed as prohibiting the disclosure of the names or addresses of students enrolled in any public school in a regional school district to the board of selectmen or town board of finance as the case may be of the town wherein the student resides for the purpose of verifying tuition payments made to such school	2(2) 3(14) 4(32) 5(25) 6(32) 7(10) 8(3) 9(1)
1-210(b)(17)	Educational records which are not subject to disclosure under the Family Educational Rights and Privacy Act 20 USC 1232g	4(2) 7(2)

Redaction Log

Total Number of Redactions in Document: 18

Redaction Reasons by Page

Page	Reason	Description	Occurrences
5	1-210(b)(17)	Educational records which are not subject to disclosure under the Family Educational Rights and Privacy Act 20 USC 1232g	13
7	1-210(b)(17)	Educational records which are not subject to disclosure under the Family Educational Rights and Privacy Act 20 USC 1232g	1
8	1-210(b)(17)	Educational records which are not subject to disclosure under the Family Educational Rights and Privacy Act 20 USC 1232g	4

Redaction Log

Redaction Reasons by Exemption

Reason	Description	Pages (Count)
1-210(b)(17)	Educational records which are not subject to disclosure under the Family Educational Rights and Privacy Act 20 USC 1232g	5(13) 7(1) 8(4)