

1 JAG NO: 2015-0665A

2 DEPOSITION OF: DARRELL MEREDITH - June 30, 2015

3
4 IN RE THE ARBITRATION OF:
5 MICHAEL and DESIREE DAVIS,
6 Claimants,
7 and
8 LITTLETON PUBLIC SCHOOL DISTRICT,
9 Respondent.

10

11

12 PURSUANT TO NOTICE, the deposition of
13 DARRELL MEREDITH was taken on behalf of the Claimants
14 at 950 17th Street, Suite 2400, Denver, Colorado
15 80202, on June 30, 2015, at 9:37 a.m., before
16 Ashley D. Mahe, Registered Professional Reporter and
17 Notary Public within Colorado.

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2	<p style="text-align: center;">A P P E A R A N C E S</p> <p>For the Claimants: MICHAEL J. ROCHE, ESQ. Lathrop & Gage, LLP 950 17th Street Suite 2400 Denver, Colorado 80202</p> <p>For the Respondent: STEVE EVERALL, ESQ. Semple, Farrington & Everall, P.C. 1120 Lincoln Street Suite 1308 Denver, Colorado 80203</p> <p>Also Present: Michael Davis Desiree Davis Carol Lembke Sarah Goodrum William Woodward Michael Jones</p>	<p style="text-align: center;">I N D E X</p> <p>EXAMINATION OF DARRELL MEREDITH: June 30, 2015</p> <p>By Mr. Roche</p> <p>DEPOSITION EXHIBITS:</p> <table border="0"> <tr> <td>Exhibit 1</td> <td>Littleton Public Schools Student Code of Conduct</td> <td style="text-align: right;">24</td> </tr> <tr> <td>Exhibit 2</td> <td>Arapahoe High School Student Planner/Handbook 2013-2014, Littleton Public Schools</td> <td style="text-align: right;">61</td> </tr> <tr> <td>Exhibit 3</td> <td>Arapahoe High School Staff Handbook 2013-2014</td> <td style="text-align: right;">64</td> </tr> <tr> <td>Exhibit 4</td> <td>Threat Assessment Best Practices and Procedures, Littleton Public Schools, Spring, 2011</td> <td style="text-align: right;">65</td> </tr> <tr> <td>Exhibit 5</td> <td>Essentials of School Threat Assessment: Preventing Targeted School Violence</td> <td style="text-align: right;">115</td> </tr> <tr> <td>Exhibit 6</td> <td>Threat Assessment Inquiry: A Summary of the Secret Service Eleven Key Questions</td> <td style="text-align: right;">116</td> </tr> <tr> <td>Exhibit 7</td> <td>Threat Assessment Guidance Document, LPS Danger Assessment, Suicide - Threats - Bullying</td> <td style="text-align: right;">123</td> </tr> <tr> <td>Exhibit 8</td> <td>Littleton Public Schools Individual Safety & Supervision Plan</td> <td style="text-align: right;">137</td> </tr> <tr> <td>Exhibit 9</td> <td>LPS Threat Assessment/Danger Assessment Training Overview</td> <td style="text-align: right;">137</td> </tr> <tr> <td>Exhibit 10</td> <td>Surveys, Culture/Climate Surveys, PBIS Surveys, Youth Risk Behavior Survey</td> <td style="text-align: right;">142</td> </tr> <tr> <td>Exhibit 11</td> <td>Littleton Public School District's Answers and Responses to Claimants' First Set of Interrogatories and Requests for Production of Documents</td> <td style="text-align: right;">144</td> </tr> <tr> <td>Exhibit 12</td> <td>2013-2014 Arapahoe High School Administrative Team Meeting, August 30, 2013</td> <td style="text-align: right;">158</td> </tr> <tr> <td>Exhibit 13</td> <td>Federal Bureau of Investigation, 12/18/13</td> <td style="text-align: right;">177</td> </tr> <tr> <td>Exhibit 14</td> <td>Letter to our Arapahoe County Citizens from Walcher, with attachment</td> <td style="text-align: right;">185</td> </tr> <tr> <td>Exhibit 15</td> <td>Progress Report</td> <td style="text-align: right;">192</td> </tr> <tr> <td>Exhibit 16</td> <td>Progress Report</td> <td style="text-align: right;">199</td> </tr> <tr> <td>Exhibit 17</td> <td>Littleton Public Schools, Administrative Review of LPS Threat Assessment Protocols, June 24, 2014</td> <td style="text-align: right;">201</td> </tr> </table>	Exhibit 1	Littleton Public Schools Student Code of Conduct	24	Exhibit 2	Arapahoe High School Student Planner/Handbook 2013-2014, Littleton Public Schools	61	Exhibit 3	Arapahoe High School Staff Handbook 2013-2014	64	Exhibit 4	Threat Assessment Best Practices and Procedures, Littleton Public Schools, Spring, 2011	65	Exhibit 5	Essentials of School Threat Assessment: Preventing Targeted School Violence	115	Exhibit 6	Threat Assessment Inquiry: A Summary of the Secret Service Eleven Key Questions	116	Exhibit 7	Threat Assessment Guidance Document, LPS Danger Assessment, Suicide - Threats - Bullying	123	Exhibit 8	Littleton Public Schools Individual Safety & Supervision Plan	137	Exhibit 9	LPS Threat Assessment/Danger Assessment Training Overview	137	Exhibit 10	Surveys, Culture/Climate Surveys, PBIS Surveys, Youth Risk Behavior Survey	142	Exhibit 11	Littleton Public School District's Answers and Responses to Claimants' First Set of Interrogatories and Requests for Production of Documents	144	Exhibit 12	2013-2014 Arapahoe High School Administrative Team Meeting, August 30, 2013	158	Exhibit 13	Federal Bureau of Investigation, 12/18/13	177	Exhibit 14	Letter to our Arapahoe County Citizens from Walcher, with attachment	185	Exhibit 15	Progress Report	192	Exhibit 16	Progress Report	199	Exhibit 17	Littleton Public Schools, Administrative Review of LPS Threat Assessment Protocols, June 24, 2014	201	4
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1 WHEREUPON, the following proceedings were
 2 taken pursuant to the Colorado Rules of Civil
 3 Procedure.
 4 * * * * *

5 DARRELL MEREDITH,
 6 having been first duly sworn to state the whole truth,
 7 testified as follows:
 8 EXAMINATION
 9 BY MR. ROCHE:
 10 Q. Good morning. First off, thank you for
 11 coming in. As you know, we are here to get your
 12 testimony in this deposition in connection with an
 13 arbitration that is occurring involving the Davis
 14 family and Littleton Public School District. Before
 15 we get into the questions, I wanted to walk through a
 16 couple of things. First, you and I know each other,
 17 obviously?
 18 A. Uh-huh.
 19 Q. So I'm happy to refer to you as either
 20 Darrell or Mr. Meredith, and I will leave it entirely
 21 up to you.
 22 A. Darrell is fine.
 23 Q. Okay. Then that's what I'll do. Ashley,
 24 who you've met, is going to be taking down everything
 25 that anybody in the room says. We're going to have a

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1 written transcript prepared of the testimony, and
 2 you're going to have the opportunity, with
 3 Mr. Everall, to review that testimony, make any
 4 changes or corrections that you think are appropriate.
 5 A. Okay.
 6 Q. So I wanted to let you know that that's
 7 coming. A couple of other rules of the road that I'd
 8 like to explain to every witness at the start of a
 9 deposition. First, Ashley can type really fast, but
 10 she's only got one machine. So it's important that we
 11 not speak over each other. I don't think that will be
 12 a significant problem in this deposition. Sometimes
 13 it is, but I don't think it will be here. So I will
 14 wait for you to finish your answers, and if you can
 15 wait until I finish my question, even though you're
 16 probably going to know where it's going, that will
 17 make her job much easier. Okay?
 18 A. Okay.
 19 Q. Another rule of the road is head shakes,
 20 and uh-huhs and huh-uhs, aren't very clear in the
 21 written record that Ashley is preparing. So if you
 22 could give verbal responses, yeses, noes, obviously
 23 explanations, those kinds of things, rather than head
 24 shakes or uh-huhs would be very helpful. Okay?
 25 A. Okay.

7

1 Q. A couple other important ones. There
 2 will come a time, probably several times, during the
 3 course of the deposition where I ask a question that
 4 doesn't make any sense to you or you don't understand
 5 it. Will you tell me when that happens so that I can
 6 rephrase the question?
 7 A. Yes, that's fine.
 8 Q. Perfect. Because, like I said, it's
 9 inevitable. It happens in every deposition, and I'd
 10 much rather you tell me, That question doesn't make
 11 sense to me, I don't understand it so help me build a
 12 good question. We'll have a better record if we do
 13 that. Okay?
 14 A. Okay.
 15 Q. Finally, this is not meant to be an
 16 endurance test, so I want you to know that. We're
 17 going to take breaks every hour to an hour and a half
 18 to let people get up, use the restroom, talk to Steve,
 19 you know, call home, whatever it is that you want to
 20 do. But that's just sort of a guideline that I use.
 21 If you want to take a break at any time and for any
 22 reason, just tell me and we will. Okay?
 23 A. Okay.
 24 Q. My only request would be if I've asked
 25 you a question and you want to take a break, will you

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1 answer that question before we take the break?
 2 A. Yes.
 3 Q. Perfect.
 4 MR. EVERALL: Unless it takes five
 5 minutes to answer it; is that right?
 6 MR. ROCHE: Fair enough.
 7 Q. (BY MR. ROCHE) Well, the first thing
 8 that I want to tell you, Darrell, is that the Davises,
 9 again, wanted me to thank you formally and on the
 10 record for your actions on December 13. They are very
 11 grateful for what you did that day in getting Claire
 12 out to the ambulance. And everything that's happened
 13 since then and everything that's happened -- and going
 14 to happen in this arbitration, doesn't change how
 15 grateful they are for what you did. So I wanted you
 16 to know that.
 17 A. Okay. Thank you.
 18 Q. You bet. Another thing that I think is
 19 important to get straight out of the box is the
 20 purpose of this arbitration is not, not, to assign
 21 blame and not to figure out whose fault Claire's
 22 murder was. Okay. It was Karl's. We know that. We
 23 get that. This is not the purpose of the arbitration,
 24 rather as I suspect, Steve and perhaps others have
 25 explained to you, the purpose of this arbitration is

9

1 to find out what happened in the days, weeks, months
 2 leading up to December 13 and what lessons can be
 3 learned from this tragedy. So I want to make sure
 4 that that's something that you've heard not just from
 5 LPS, but also from the Davis family. Okay?
 6 A. Okay.
 7 Q. So with all of that said, do you have any
 8 questions of me before we get started?
 9 A. No, I don't think so.
 10 Q. Okay. Well, then let's jump into it.
 11 First, what is your title at Arapahoe High School?
 12 A. Just official title is just assistant
 13 principal.
 14 Q. And how long have you been an assistant
 15 principal at Arapahoe?
 16 A. Finished my eighth year.
 17 Q. And prior to that, were you in a
 18 different role at Arapahoe?
 19 A. From '92 to 2001, I was a science teacher
 20 and science department chairman.
 21 Q. At Arapahoe?
 22 A. At Arapahoe.
 23 Q. So you've been at Arapahoe for almost 25
 24 years, 23?
 25 A. I had a hiatus at Heritage High School as

10

1 an administrator.
 2 Q. And what was your role at Heritage and
 3 when was that?
 4 A. So I was dean from 2001 to spring of
 5 2007.
 6 Q. Okay.
 7 A. Or dean for two years and assistant
 8 principal for three.
 9 Q. Okay. So when did you go back to
 10 Arapahoe after your hiatus at --
 11 A. 2007.
 12 Q. -- Heritage? 2007?
 13 A. Yeah, the spring of 2007. I actually did
 14 some work over the summer of 2007.
 15 Q. Okay. And in broad strokes, what is --
 16 what were your job responsibilities as assistant
 17 principal at Arapahoe High School?
 18 A. To last year, which would be the '14-'15
 19 school year, I was initially in charge of all 9th
 20 grade attendance and behavior, various department
 21 liaison. So I was department liaison to two or three
 22 departments, depending on the year. Safety and
 23 security, building maintenance, a sundry of
 24 activities, prom, after prom, in broad strokes other
 25 duties as assigned, as it says in my contract.

11

1 Q. Okay. And as assigned by the district or
 2 as assigned by the principal?
 3 A. The principal.
 4 Q. Okay. And you mentioned that you were
 5 assigned for this most recently completed school year
 6 responsibility for attendance and behavior for the 9th
 7 graders, right?
 8 A. Well, let's see. It would be up through
 9 -- it was -- my first three years was just 9th grade,
 10 and then we decided that administrators would move
 11 with the grade.
 12 Q. And that's what I was getting at. As I
 13 understand it at Arapahoe High School, each graduating
 14 class is assigned an assistant principal who is going
 15 to be responsible for the duties of an assistant
 16 principal with respect to that class for their entire
 17 four years at the school; is that right?
 18 A. Can you restate the question?
 19 Q. Sure. See, I told you we'd have a
 20 question that doesn't make sense right out of the box.
 21 A. It's okay.
 22 Q. As I understand it, each class is
 23 assigned an assistant principal at Arapahoe, right?
 24 A. Just recently.
 25 Q. And when did that process start?

12

1 A. Three years ago.
 2 Q. Okay. So --
 3 A. So I -- well, can I rephrase what my --
 4 Q. Of course.
 5 A. So I was with 9th grade, and then their
 6 10th grade year they would go to another assistant
 7 principal.
 8 Q. Okay.
 9 A. And then they would take the last three
 10 years. But for whatever reason, it was determined
 11 that my expertise was with 9th grade.
 12 Q. Okay.
 13 A. So Ron Booth, when he hired me, said,
 14 What do you think about that, you'll have 9th grade
 15 attendance and discipline. Which can be a little
 16 greater than some other grades.
 17 Q. Okay.
 18 A. And initially that year 2007, we had
 19 another assistant principal who helped me with that
 20 because it's a greater consumer of time. So Mike
 21 Campbell and I worked on 9th grade.
 22 Q. Okay. And my understanding, and correct
 23 me if I'm wrong, Kevin Kolasa is another assistant
 24 principal at Arapahoe?
 25 A. He was.

13

1 **Q. Or was, I should say; is that right?**
 2 A. Correct.
 3 **Q. And for at least the last three years of**
 4 **the tenure of the graduating class of 2014, he was the**
 5 **assistant principal assigned to that class?**
 6 A. Kevin was only there two years. So it
 7 would have been the 11th and 12th grade year.
 8 **Q. Okay. And who was assigned to the class**
 9 **of 2014 for their 10th grade year, if you remember?**
 10 A. I'm not positive, but I think it might
 11 have been Natalie Pramenko as an assistant principal
 12 and then --
 13 **Q. Before she was promoted to principal?**
 14 A. Correct. Yeah.
 15 **Q. Okay. And during the graduating class of**
 16 **2014, during their freshman year, you were assigned to**
 17 **that class as an assistant principal because you dealt**
 18 **with all of the freshman?**
 19 A. So the class -- one more time.
 20 **Q. Sure. What I'm trying to figure out is**
 21 **what assistant principal was assigned to deal with**
 22 **attendance and behavior for the class of 2014 during**
 23 **that class's freshman year?**
 24 A. Oh, I was.
 25 **Q. You were?**

14

1 A. Yep.
 2 **Q. And then the next year's was, you**
 3 **believe, was Natalie Pramenko?**
 4 A. Uh-huh.
 5 **Q. And then the final two years it was Kevin**
 6 **Kolasa; is that right?**
 7 A. Correct. Correct.
 8 **Q. Got it. Now, when I asked you about your**
 9 **job descriptions and job responsibilities, you**
 10 **mentioned that with respect to the assigned class, you**
 11 **dealt with attendance and behavior issues; is that**
 12 **right?**
 13 A. Correct.
 14 **Q. And would that also be true for the other**
 15 **assistant principals who are assigned to a particular**
 16 **graduating class?**
 17 A. Correct.
 18 **Q. Okay. And help me understand what you**
 19 **mean by attendance and behavior issues.**
 20 A. So attendance issues range from chronic
 21 tardies to chronic absences to chronic truancy. And
 22 all of that affects student performance. So if you
 23 try to -- you address it early, then hopefully -- the
 24 hope is that it will help the student's performance,
 25 help them change their behavior. So that's

15

1 attendance. That includes especially the 9th and 10th
 2 grade year, SARB, which is a student attendance review
 3 board, and truancy court through Arapahoe County.
 4 **Q. Okay.**
 5 A. And after 10th grade year, most of the
 6 students get to the age of 16 to 17, where SARB will
 7 still intervene, but the Arapahoe County won't take a
 8 new case after they're 15 and a half.
 9 **Q. Okay. And then on the behavior and**
 10 **discipline side of things?**
 11 A. Sure. Behavior can range from dress code
 12 violations, all the way up to suspension and expulsion
 13 for a variety -- I mean, a whole gamut of behavior
 14 issues.
 15 **Q. Okay. And so, for instance, when a**
 16 **student who is in the class that you're assigned to is**
 17 **going through the suspension or expulsion process,**
 18 **you're actively involved in that?**
 19 A. Yes, if that's the grade that I'm working
 20 with at the time.
 21 **Q. And, similarly, if a threat assessment is**
 22 **being done on a student in your grade, will you be**
 23 **actively involved in the threat assessment process for**
 24 **that student?**
 25 A. Generally. There are examples -- or I

16

1 guess I can't think of anything in particular where
 2 you might not be involved for a variety of reasons, if
 3 you were out of the building and another assistant
 4 principal decides to take on that responsibility.
 5 That's the only real example I can think of. If the
 6 -- if the threat was brought to that assistant
 7 principal's general knowledge and the assigned
 8 assistant principal for that grade wasn't available.
 9 **Q. Okay. But as a rule of thumb when there**
 10 **is a threat assessment done, one of the participants**
 11 **in that threat assessment process is the assistant**
 12 **principal who is assigned to that class?**
 13 A. Correct.
 14 **Q. Got it. You also mentioned that your job**
 15 **responsibilities included safety and security?**
 16 A. Uh-huh.
 17 **Q. Has that -- was that a responsibility of**
 18 **yours prior to the end of the 2013-2014 academic year?**
 19 A. Yes.
 20 **Q. How long has safety and security been a**
 21 **part of your job responsibility?**
 22 A. At Arapahoe?
 23 **Q. Yes.**
 24 A. Since I was hired as an assistant
 25 principal.

17

1 **Q. And --**
 2 A. And it is an expectation, I guess, of
 3 teachers as well.
 4 **Q. Okay. And that's an important**
 5 **distinction that I do want to draw. I understand that**
 6 **safety and security is considered a responsibility for**
 7 **essentially every adult in the building. What I'm**
 8 **trying to get at is did you have some responsibility**
 9 **for safety and security at Arapahoe above and beyond**
 10 **that responsibility that every faculty and staff**
 11 **member had?**
 12 A. Yes.
 13 **Q. Okay. What was that responsibility that**
 14 **you had over and above the ordinary safety and**
 15 **security responsibilities?**
 16 A. Liaison with our school resource officer.
 17 **Q. And that's Deputy Englert?**
 18 A. It was, yeah, and prior to that, it was
 19 another assigned deputy or if James is absent.
 20 **Q. Okay.**
 21 A. Also in charge of temp supervisors, I'm
 22 their direct supervisor.
 23 **Q. Okay.**
 24 A. Worked directly with Guy Grace and his
 25 district security staff.

18

1 **Q. Okay. And in your capacity as the**
 2 **supervisor for the direct report for the campus**
 3 **supervisors, you were somebody that they would come to**
 4 **if there were issues that they thought warranted the**
 5 **attention of the school administration?**
 6 A. I was their general contact.
 7 **Q. Okay. And in your role as the assistant**
 8 **principal assigned to safety and security, did you --**
 9 **in the period prior to December 13, 2013, did you**
 10 **prepare periodic reports for Guy Grace, Natalie**
 11 **Pramenko, anybody else at LPS?**
 12 A. No reports.
 13 **Q. Okay. So when issues arose at the school**
 14 **that came to your attention in your capacity as the**
 15 **safety and security person at the school, how would**
 16 **you report those up the chain either to Ms. Pramenko**
 17 **or to the district offices?**
 18 A. Verbally.
 19 **Q. Okay. And what kind of issues would**
 20 **warrant a verbal report from you up to either**
 21 **Ms. Pramenko or to Guy Grace or somebody else at the**
 22 **LPS district offices?**
 23 A. For example, most common ly would be
 24 parking issues. I mean, that was probably the most
 25 common issue that would be reported from campus

19

1 supervisors to me. Student has over ten tickets, for
 2 example.
 3 **Q. Okay.**
 4 A. Generally we would talk to the assistant
 5 principal in charge of that grade, let's say it's a
 6 junior or a senior, and have them address it, have --
 7 Natalie would be aware of that. Other reportable, I
 8 guess, day-to-day instances would be something that
 9 would be suspendable. I mean, a major -- what would
 10 be considered a greater behavior issue.
 11 **Q. Okay. And if there was a suspendable**
 12 **behavior, your general rule was to report that in some**
 13 **form or fashion to Natalie Pramenko or to the district**
 14 **offices?**
 15 A. It went first to the assistant principal
 16 in charge of that grade.
 17 **Q. Okay. And that responsibility sort of**
 18 **blended then with -- the safety and security component**
 19 **of your responsibilities blended with the behavior and**
 20 **discipline responsibilities that you had for a**
 21 **particular class and also blended with the behavior**
 22 **and discipline responsibilities that the other**
 23 **assistant principals had with respect to their**
 24 **classes?**
 25 A. Correct.

20

1 **Q. Got it. Now, when suspendable offenses**
 2 **occurred, would those be reported either by you or by**
 3 **the other assistant principals in writing or was that**
 4 **also done verbally?**
 5 A. From me to another assistant principal?
 6 **Q. Yes.**
 7 A. It was verbally.
 8 **Q. And then when they were -- when those**
 9 **suspendable offenses were reported to Natalie**
 10 **Pramenko, were those reported in writing?**
 11 A. From me or from the other assistant
 12 principal?
 13 **Q. Well, let's start with from you.**
 14 MR. EVERALL: Well, what's the -- he's
 15 drawing a distinction, if I can interrupt, between his
 16 group of students and students that belong, if you
 17 will, to other assistant principals.
 18 MR. ROCHE: Fair enough.
 19 MR. EVERALL: So maybe if you broke it
 20 down for him.
 21 MR. ROCHE: Yes, I'm happy to do that.
 22 **Q. (BY MR. ROCHE) When you reported a**
 23 **suspendable offense from your class to the principal,**
 24 **would you do so in writing or verbally?**
 25 A. Verbally.

21

1 **Q. And when you reported --- well, strike**
 2 **that.**
 3 **Do you know whether other assistant**
 4 **principals, when they reported suspendable offenses to**
 5 **Ms. Pramenko, did so verbally or in writing?**
 6 A. I don't know that.
 7 **Q. Okay. Would you, as a common practice,**
 8 **discuss with the other assistant principals**
 9 **suspendable offenses that occurred in your class or in**
 10 **their classes?**
 11 A. We would review suspensions generally on
 12 Monday in our administrative meeting.
 13 **Q. Okay. And there would be a discussion**
 14 **about, Well, this kid got suspended for X --**
 15 A. Correct.
 16 **Q. -- here is how long he's out. If you see**
 17 **him, call security, that kind of thing?**
 18 A. Correct.
 19 **Q. And if it was a more serious issue, you**
 20 **would implement some kind of plan to address whatever**
 21 **that concern might be?**
 22 A. Correct.
 23 **Q. Got it. And what about more informally,**
 24 **just sitting around over lunch with Kevin Kolasa or**
 25 **Steve Sisler, would you say, Oh, I've got to suspend**

22

1 **student X, what do you think? Should I report it,**
 2 **should I not? Would you have those kind of informal**
 3 **discussions with the other assistant principals?**
 4 A. At times generally in an office, always
 5 in an office. We would -- for example, you mentioned
 6 lunch. Lunch is pretty public and it's kind of off
 7 limits for that kind of discussion.
 8 **Q. Okay.**
 9 A. But, yes, assistant principals would talk
 10 about opinions. I have this particular instance, what
 11 do you think?
 12 **Q. Okay. And circling back to reporting**
 13 **suspendable offenses to the district that is outside**
 14 **of the school and up to the district level, is that**
 15 **something that assistant principals did or is that**
 16 **something that the principal did?**
 17 A. For a suspension?
 18 **Q. For a -- yes, for a suspendable offense.**
 19 A. If the suspension -- if it was a
 20 suspension, then the paperwork did go to the district,
 21 to the office of student services.
 22 **Q. Okay. And one of the things I'm trying**
 23 **to get at is who was responsible for making the**
 24 **decision -- strike that.**
 25 **Not every suspendable offense resulted in**

23

1 **a suspension, right?**
 2 A. Correct.
 3 **Q. And somebody would make the decision**
 4 **whether or not to formally suspend a student who has**
 5 **committed a suspendable offense, right?**
 6 A. Correct.
 7 **Q. And who generally is given that**
 8 **discretion or decision-making authority to decide**
 9 **whether or not a particular suspendable offense ought**
 10 **to actually lead to a suspension?**
 11 A. Who is given the authority?
 12 **Q. Yes.**
 13 A. All of the assistant principals have that
 14 authority and the principal.
 15 **Q. Okay. And generally speaking, does the**
 16 **assistant principal assigned to a class make that**
 17 **decision whether or not to suspend a student for his**
 18 **-- a student in his or her class?**
 19 A. Yes.
 20 **Q. Okay. And is there any formal or**
 21 **informal review process of, All right, well, should we**
 22 **suspend this kid for this suspendable offense? Did**
 23 **the other assistant principals have a hand in that?**
 24 A. No. Generally that's the assistant
 25 principal and the principal.

24

1 **Q. Okay. And is -- go ahead.**
 2 A. And at times, they do call the director
 3 of student services or director of high schools.
 4 **Q. Okay. And I presume that that would be**
 5 **something that is driven, at least in your experience,**
 6 **by the severity of the suspendable offense?**
 7 A. The behavior.
 8 **Q. Yeah. Now, lawyers love paper. I'm**
 9 **going to hand you some paper.**
 10 A. That's a lot of paper.
 11 **Q. The scary thing is, in my world it's**
 12 **really not.**
 13 (Deposition Exhibit 1 was marked.)
 14 **Q. You have to give that back to Ashley at**
 15 **the end or she'll lose her mind. Exhibit 1 is the**
 16 **Littleton Public Schools Student Code of Conduct for**
 17 **the 2013-2014 school year, correct?**
 18 A. Correct.
 19 **Q. And the reason I've given you this,**
 20 **because I'm not trying to hide the ball with you, is I**
 21 **want to walk through some of the resources and tools**
 22 **that Arapahoe High School had available to it to**
 23 **address disciplinary, behavioral, and safety and**
 24 **security issues. Okay?**
 25 A. Okay.

25

1 **Q. So first, is this a document that you've**
 2 **seen before and are familiar with?**
 3 A. Yes.
 4 **Q. And is this a document that is given to**
 5 **every parent and student when they start the school**
 6 **year?**
 7 A. Yes.
 8 **Q. Is it mailed out? Is it e-mailed out?**
 9 **How do the parents and students get this?**
 10 A. It's distributed in the school during
 11 second or third hour generally the second week of
 12 school.
 13 **Q. So every kid is actually given a hard**
 14 **copy of this?**
 15 A. Correct.
 16 **Q. And told to take home to their parents --**
 17 A. Correct.
 18 **Q. -- which some presumably do and lots put**
 19 **in their lockers and it disappears?**
 20 A. Right. That is correct.
 21 **Q. And this is a document that outlines what**
 22 **types of behaviors are acceptable at Arapahoe and what**
 23 **types are not, right?**
 24 A. Correct.
 25 **Q. It also outlines what rights students**

26

1 **have while they're at school and what rights they**
 2 **don't have, right? That's one of the things that's**
 3 **covered in here?**
 4 A. Correct.
 5 **Q. Okay. And if you look in the bottom**
 6 **right corner of Exhibit 1, you'll see there's**
 7 **numbers --**
 8 A. Uh-huh.
 9 **Q. -- that we call them Bates numbers. And**
 10 **those are a way to keep track of documents that have**
 11 **been produced by which side in an arbitration or**
 12 **litigation. So the notation LPS and then numbers**
 13 **indicates that it's a document that Littleton Public**
 14 **Schools produced to me in connection with this**
 15 **arbitration. That's just sort of a reference point.**
 16 **I wanted to direct your attention to the page that is**
 17 **labeled LPS 01061. It's just a couple of pages in.**
 18 **And this is a -- it's titled "Quick Reference Student**
 19 **Code of Conduct." Do you see that?**
 20 A. I do.
 21 **Q. And it lists a whole series of behaviors**
 22 **that are not to be tolerated at Arapahoe High School,**
 23 **right?**
 24 A. Well, I guess for clarity sake, it says
 25 "may" in the third paragraph.

27

1 **Q. Yes.**
 2 A. So not tolerated, that sounds black or
 3 white.
 4 **Q. Sure.**
 5 A. And with this list of 31 behaviors,
 6 there's always discretion.
 7 **Q. Sure.**
 8 A. Shades of gray, I guess, instead of black
 9 and white.
 10 **Q. Understood. Understood. So this list of**
 11 **31 items is a list of behavior that may result in**
 12 **suspension or expulsion of a student, right?**
 13 A. Correct.
 14 **Q. When this code of conduct is handed out**
 15 **to the kids at the beginning of the year, do they get**
 16 **any training on this from the school or the**
 17 **administration, or do they walk through the document**
 18 **in any way?**
 19 A. Depending on the year, there are points
 20 of emphasis that the teacher for that hour makes.
 21 **Q. Okay. But this is handed out by a**
 22 **teacher in a given hour the second week of school?**
 23 A. Correct.
 24 **Q. So, for instance, student A may get this**
 25 **from their science teacher, student B may get this**

28

1 **from their math teacher, and student C may get this**
 2 **from their English teacher?**
 3 A. Correct.
 4 **Q. And each of the teachers is given some**
 5 **discretion about what and how to do this with code of**
 6 **conduct when he or she hands it out to the students,**
 7 **right?**
 8 A. There is discretion. There is always at
 9 least one page of written directions for points of
 10 emphasis --
 11 **Q. Okay.**
 12 A. -- that goes along with a signature
 13 sheet.
 14 **Q. And are the students required to sign**
 15 **something acknowledging that they received a copy of**
 16 **this?**
 17 A. Correct.
 18 **Q. And what are general -- in broad strokes,**
 19 **I don't have the sheet that says, Here are the points**
 20 **of emphasis that the teachers should make when they**
 21 **hand these out to the students. Can you tell me in**
 22 **broad strokes what appears on that sheet?**
 23 A. Depending on the year, what I remember,
 24 drug and alcohol violations are highlighted.
 25 Generally the students always want to find or have

29

1 questions about dress code.
 2 **Q. Okay.**
 3 A. I think to the best of my memory, the one
 4 consistent point of emphasis is the drug and alcohol
 5 policy.
 6 **Q. Okay. And for the 2013-2014 calendar**
 7 **year that we're looking at now, do you recall any**
 8 **other points of emphasis that were conveyed to the**
 9 **teachers who in turn conveyed to the students who**
 10 **received this student code of conduct?**
 11 A. I don't.
 12 **Q. Okay. And among the 31 different**
 13 **suspendable or expellable offenses -- is that a phrase**
 14 **we can agree on? I'm not saying they automatically or**
 15 **must result in a suspension, but any one of these 31**
 16 **behaviors may result in either a suspension or an**
 17 **expulsion; is that fair?**
 18 A. I think that's fair.
 19 **Q. Okay. So when we look at these 31**
 20 **behaviors, I want to ask you about some in particular**
 21 **that obviously have some potential relevance to what**
 22 **happened at Arapahoe in December of 2013. No. 7**
 23 **informs the students and the teachers that a student**
 24 **can be suspended or expelled for any threatening**
 25 **behavior, which is any expression, direct or indirect,**

30

1 **made in writing, orally, or by gesture, of intent to**
 2 **inflict harm, injury, or damage to persons or**
 3 **property. Do you see that?**
 4 A. I do.
 5 **Q. And that is clearly a suspendable or**
 6 **perhaps even an expellable offense?**
 7 A. Maybe. Yes. I mean . . .
 8 **Q. It's clearly suspendable and it may be**
 9 **expellable, is that what you're --**
 10 A. No, it may be suspendable.
 11 **Q. Okay. Similarly, misuse of computers,**
 12 **the Internet, cell phones, digital audio/video**
 13 **players, personal digital devices or other technology,**
 14 **may also be a suspendable offense, correct?**
 15 A. Maybe, yes.
 16 **Q. Jumping down to item 16, "Continued**
 17 **willful disobedience or open and persistent defiance**
 18 **of property authority, including deliberate refusal to**
 19 **obey a member of the school staff," that may also be a**
 20 **suspendable offense?**
 21 A. Yes.
 22 **Q. So is -- I'm on the next page now, item**
 23 **21, "Directing profanity, vulgar language, or obscene**
 24 **gestures towards other students, District employees,**
 25 **or visitors to school," may also be a suspendable**

31

1 **offense?**
 2 A. Yes.
 3 **Q. So is engaging in bullying behavior,**
 4 **correct?**
 5 A. Correct.
 6 **Q. And so is engaging in verbal abuse, name**
 7 **calling, derogatory statements addressed publically to**
 8 **others that can precipitate disruption of the school**
 9 **program or incite violence. That's also a suspendable**
 10 **offense?**
 11 A. Correct.
 12 **Q. And so is engaging in verbal or physical**
 13 **harassment or intimidation of any staff member,**
 14 **another student, or any person, correct?**
 15 A. Correct.
 16 **Q. And when a student engages in one of**
 17 **these behaviors, what does the school do?**
 18 MR. EVERALL: I guess I'm going to object
 19 to that one. It's kind of vague and broad. If you
 20 could --
 21 MR. ROCHE: Well, it is certainly broad
 22 so let me --
 23 MR. EVERALL: If you could give him some
 24 -- a little guidance.
 25 MR. ROCHE: Sure. Absolutely.

32

1 **Q. (BY MR. ROCHE) It is absolutely a broad**
 2 **question, and candidly I intended it to be a broad**
 3 **question. What I'm trying to understand is were there**
 4 **specific resources and instructions given to the**
 5 **teachers and/or the administrators at Arapahoe to let**
 6 **them know what to do when students engaged in these**
 7 **behaviors?**
 8 THE DEPONENT: Could you reread the
 9 question?
 10 A. Or if you want to restate it, I think you
 11 said are there specific instructions given to teachers
 12 and administrators; is that correct?
 13 **Q. (BY MR. ROCHE) Yes.**
 14 A. Specific instructions, no.
 15 **Q. Okay. So based on your experience and**
 16 **training, when a student engaged in one of these**
 17 **suspendable behaviors, what was the appropriate course**
 18 **of action to take?**
 19 A. The appropriate course of action is to
 20 address the behavior based on the person who observed
 21 it, for example, teacher, because some of these things
 22 happen in a classroom --
 23 **Q. Right.**
 24 A. -- without an administrator present.
 25 Those are addressed by the teacher. If it happens in

33

1 front of an administrator, then we would address it.
 2 So the manner in which it is addressed depends on the
 3 person who observed it.
 4 **Q. Okay. And when one of these behaviors**
 5 **occurs and the decision is made not to suspend the**
 6 **student for that behavior, is that documented somehow?**
 7 A. No.
 8 **Q. Okay. And that was true prior to**
 9 **December of 2013?**
 10 A. Correct.
 11 **Q. And that's still the case now?**
 12 A. Yes.
 13 **Q. Okay.**
 14 A. I guess I don't know if there needs to be
 15 any clarity. I mean --
 16 **Q. Sure. Go ahead.**
 17 A. -- some of these items out of the list of
 18 31 happen in a classroom on very minimal degrees I
 19 guess and they're addressed by a teacher. And a
 20 teacher will go about the lesson or the activity for
 21 that day and I guess they move on.
 22 **Q. Sure. No, and that makes sense, and I**
 23 **think that's a fair clarification, and I'm certainly**
 24 **not by my questions meaning to imply that there is a**
 25 **one-size-fits-all response to the 31 different**

34

1 **behaviors listed here.**
 2 A. Okay.
 3 **Q. And I also recognize that in the 31**
 4 **different behaviors listed here that may lead to a**
 5 **suspension in any one of those categories, it can have**
 6 **different levels of severity. So I do understand and**
 7 **appreciate that.**
 8 A. Okay.
 9 **Q. As I say, what I'm trying to get at is**
 10 **what tools and resources does LPS make available to**
 11 **you as the administrators and to the teachers at**
 12 **Arapahoe to address behavior and discipline problems?**
 13 A. Okay. So different question?
 14 **Q. Yes. Absolutely.**
 15 A. Okay. So district provides training for
 16 suspension and expulsion yearly for all
 17 administrators.
 18 **Q. Okay.**
 19 A. And that's generally a two- to three-hour
 20 training done by the director of student services and
 21 sometimes in conjunction with a director of high
 22 schools or secondary education or the director of
 23 elementary education.
 24 **Q. And you said that's just for the**
 25 **administrators, it's not training that's provided to**

35

1 **the teachers?**
 2 A. Correct.
 3 **Q. And it's taught by the director of**
 4 **student services; did I hear that right?**
 5 A. Correct.
 6 **Q. And who is that?**
 7 A. Now?
 8 **Q. Well, who was it in 2013-2014?**
 9 A. I believe it was Karen Goodwin.
 10 **Q. And who is it now?**
 11 A. I believe the position has been broken
 12 into two.
 13 THE DEPONENT: Mike, can you provide
 14 clarity? I think it's Nate Thompson and Brian Jesse.
 15 **Q. (BY MR. ROCHE) Steve is correct, that is**
 16 **something that we can fill in later. If you don't**
 17 **know the answer, that's is fine, but your lawyer is**
 18 **going to have a heart attack if you start asking other**
 19 **people --**
 20 MR. EVERALL: I'm still here.
 21 **Q. (BY MR. ROCHE) -- to give me answers.**
 22 A. Okay.
 23 THE DEPONENT: Steve --
 24 MR. EVERALL: No, you're -- one of the
 25 rules of a deposition is you can't seek assistance

36

1 from others.
 2 THE DEPONENT: Okay.
 3 **Q. (BY MR. ROCHE) Totally natural thing to**
 4 **do. No problem. Don't worry about it.**
 5 A. I believe I'm correct --
 6 **Q. Okay.**
 7 A. -- in that it's Nate Thompson and Brian
 8 Jesse.
 9 **Q. Okay.**
 10 A. I'll go it alone.
 11 **Q. Okay. So in addition to the suspension**
 12 **and expulsion training that's provided on an annual**
 13 **basis, what other training does LPS provide to the**
 14 **teachers and administrators at Arapahoe to deal with**
 15 **behavioral and safety and security issues?**
 16 A. Part of the -- prior to 2013, part of
 17 that training is also a danger assessment training
 18 which includes suicide and threat assessment.
 19 **Q. Okay. And we're certainly going to get**
 20 **into that. That was done on an annual basis?**
 21 A. Correct.
 22 **Q. And that was done and made available to**
 23 **the administrators?**
 24 A. Correct.
 25 **Q. And since 2013, that's done twice a year;**

37

1 is that right?

2 A. Correct.

3 Q. And it's still available to

4 administrators, correct?

5 A. Correct.

6 Q. It's also available to campus security?

7 A. Correct.

8 Q. But not to the teachers?

9 A. I believe if a teacher were to ask, they

10 could go to the danger assessment training.

11 Q. But it's not provided as a matter of

12 course to the teachers, right?

13 A. No.

14 Q. No, it is not; or, no, I am wrong?

15 A. No, it is not.

16 Q. That was one of those bad questions I

17 asked where I know the record is going to be

18 confusing, so I appreciate the clarification. Let's

19 keep plowing through to student code of conduct if we

20 could. I want to direct your attention to page LPS

21 1081. At the bottom of this page is a section titled

22 "Student Interrogations and Searches (Board Policy

23 JIH)." Do you see that?

24 A. I do.

25 Q. And are you familiar with that board

38

1 policy?

2 A. Yes, I am.

3 Q. Okay. And you're familiar with this

4 section of the student code of conduct, correct?

5 A. Yes, I am.

6 Q. And this section of the student code of

7 conduct makes clear that "The Board of Education seeks

8 to maintain a climate in the schools which is

9 conducive to learning and protective of the safety and

10 welfare of staff and students. To achieve this goal,

11 it may be necessary for school personnel to search the

12 person and/or personal property of a student and to

13 seize any property deemed injurious or detrimental to

14 the safety and welfare of students and staff." Do you

15 see that?

16 A. I do.

17 Q. And that has been the policy at Littleton

18 Public Schools and Arapahoe High School, in

19 particular, for many years, has it not?

20 A. I would assume so without looking at code

21 of conduct for the past several years.

22 Q. Well, let's -- let me get at it this way.

23 It's been your understanding as an assistant principal

24 at Arapahoe that the school administration had the

25 authority to under certain circumstances interrogate

39

1 students, correct?

2 A. Within reason.

3 Q. And it's been your understanding as an

4 assistant principal at Arapahoe that the school had

5 the authority under certain circumstances to search

6 the students themselves, right?

7 A. Correct.

8 Q. And the personal property of the

9 students, correct?

10 A. Correct.

11 Q. And to seize any property deemed

12 injurious or detrimental to the safety and welfare of

13 the students and staff, correct?

14 A. Correct.

15 Q. And that's been a right and a power or a

16 tool that the school has had to protect the safety of

17 its staff and students for several years, correct?

18 A. As far as I know.

19 Q. And that was a right and a power and a

20 tool that the school had in the 2013-2014 academic

21 year; isn't that your understanding?

22 A. Correct.

23 Q. Okay. And the circumstances when the

24 school can interrogate a student, search a student,

25 and search a student's property are defined below the

40

1 paragraph that we were just discussing, right? And

2 specifically what it says is, "'Reasonable suspicion'

3 is the standard for a search on school property or at

4 school activities carried out by school authorities,"

5 right?

6 A. Correct. Reasonable suspicion.

7 Q. Right. So you can't just randomly pull a

8 kid out of class and search them and their stuff?

9 A. Correct.

10 Q. But if you have a reasonable suspicion to

11 believe there is something amiss, you can search that

12 student and his or her property, right?

13 A. Correct. And reasonable, I guess, is

14 that broad stroke that you keep mentioning --

15 Q. Correct.

16 A. -- up to the individual.

17 Q. Right. And reasonable suspicion in the

18 student code of conduct is explained to be,

19 "Reasonable suspicion should be based on facts

20 provided by a reliable informant or personal

21 observation which caused the school official to

22 believe, based on his/her own experience, that search

23 of a particular person, place, or thing would lead to

24 the discovery of evidence of a violation of Board of

25 Education policy or state laws. Reasonable suspicion

41

1 requires more than a mere hunch," right?

2 A. Correct.

3 Q. So you've got to be able to articulate,

4 This is why I want to search this kid, right?

5 A. Correct.

6 Q. I can't remember if I asked this or not,

7 so forgive me if I have. Does LPS or Arapahoe conduct

8 any training of its administrators and teachers on the

9 fact that they have the right to interrogate and

10 search students under certain circumstances?

11 A. Some of that is covered in the

12 suspension/expulsion yearly training.

13 Q. Okay. And, again, that's just for the

14 administrators, not for the teachers?

15 A. Correct.

16 Q. Okay.

17 A. I'm going to get a drink of water.

18 Q. Sure. And from what I understand,

19 Arapahoe actually does conduct interrogations and

20 searches of students or their property on a periodic

21 basis when they have reason to believe that there is

22 something amiss, right, it happens every year?

23 A. Correct.

24 Q. Multiple times every year?

25 A. Correct.

42

1 Q. And I'm going to guess, but I'll ask you,

2 the majority of the searches that occur at Arapahoe

3 are related to drugs, alcohol, that kind of

4 contraband; is that right?

5 A. Correct.

6 Q. And there are at least some searches done

7 every year related to weapons?

8 A. I don't know about every year.

9 Q. Okay. But there are occasionally --

10 there have been instances --

11 A. Yes.

12 Q. -- where Arapahoe staff have conducted a

13 search of a student or a student's property for

14 evidence of weapons?

15 A. Correct.

16 Q. Okay. How often does Arapahoe conduct a

17 search of a student's electronic media, computers,

18 laptops, cell phones, iPads, tablets, those kinds of

19 things?

20 MR. EVERALL: I'll object to the

21 vagueness and generality of the question. Maybe you

22 could confine it to a temporal situation. Every year,

23 every two years.

24 Q. (BY MR. ROCHE) Well, I could -- let's

25 start very broadly. During your time at Arapahoe, has

43

1 the school ever conducted a search of a student's

2 electronic media?

3 A. Yes.

4 Q. Does it happen every semester? Does it

5 happen every year?

6 A. I think it's fair to say it's happened at

7 least once a year.

8 Q. Okay. And generally speaking, who makes

9 the decision, We should look at this kid's phone or

10 iPad or laptop?

11 A. Generally, the assistant principal.

12 Q. Okay. Does an assistant principal have

13 to get any additional authority or approval from the

14 principal or LPS before searching a kid's phone,

15 laptop, iPad?

16 A. No.

17 Q. They can just make that decision on their

18 own?

19 A. Correct.

20 Q. Okay. And when is that -- what are --

21 strike that.

22 In your experience, what are the most

23 common reasons for searching a student's electronic

24 media? Is it drugs and alcohol again?

25 THE DEPONENT: So could you reread the

44

1 question, please?

2 Q. (BY MR. ROCHE) Let me ask a different

3 one.

4 A. Okay.

5 Q. What are some of the reasons that an

6 assistant principal or a principal at Arapahoe would

7 search a student's electronic media?

8 A. You're looking for the majority of the

9 time?

10 Q. I'm just looking for --

11 A. Any reason?

12 Q. A list of the reasons that you have seen

13 used to conduct a search of a student's electronic

14 media.

15 A. As you pointed out, drugs and alcohol.

16 Q. Okay.

17 A. Suicide threat.

18 Q. Okay. Threats against another person?

19 A. I'm trying to think of any example that I

20 can recall of that --

21 Q. Okay.

22 A. -- there have been examples of that.

23 Examples of questionable assignments, writings.

24 Q. So plagiarism, those kinds of things,

25 cheating?

45

1 A. Or something related to a threat to
2 themselves or others.

3 **Q. Oh, I'm sorry, when I heard questionable**
4 **writings -- I appreciate that. Writings that a**
5 **student had written that gave concern that they were**
6 **either going to hurt themselves or others?**

7 A. Correct. And I think those are the only
8 examples that I can think of.

9 **Q. Weapons?**

10 A. Not that I know of.

11 **Q. Okay. And has -- and to the best of your**
12 **recollection, has Arapahoe conducted those searches**
13 **both prior to and after December of 2013?**

14 A. Yes.

15 **Q. Let's jump ahead to page 1085, also page**
16 **26 of the student code of conduct. There's a section**
17 **there titled "Disciplinary Information to School**
18 **Personnel." Do you see that?**

19 A. I do.

20 **Q. And you're familiar with that section of**
21 **the student code of conduct?**

22 A. I am familiar with it.

23 **Q. Okay. And you will see in that section a**
24 **student code of conduct provides that "In accordance**
25 **with state law, the principal or designee is required**

46

1 **to communicate disciplinary information concerning any**
2 **student enrolled in the school to any teacher who has**
3 **direct contact with the student in the classroom and**
4 **to any counselor who has direct contact with the**
5 **student." Do you see that?**

6 A. I do.

7 **Q. And is that a requirement that you were**
8 **familiar with in 2013?**

9 A. I was.

10 **Q. And this section goes on to say that "The**
11 **purpose of this requirement is to keep school**
12 **personnel apprised of situations that could pose a**
13 **risk to the safety and welfare of others." Do you see**
14 **that?**

15 A. I do.

16 **Q. And was that your understanding of the**
17 **purpose of that requirement?**

18 A. Yes.

19 **Q. You see it then goes on to talk about**
20 **what disciplinary information is and is not in the**
21 **remainder of that section. Do you see that?**

22 A. I do see that.

23 **Q. Okay. And my question is, how did**
24 **Arapahoe communicate disciplinary information about a**
25 **kid to the teachers and counselors who had contact**

47

1 **with that kid?**

2 A. With disciplinary information -- so if a
3 student was suspended, then the information went from
4 that assistant principal's office to the teachers and
5 the counselor.

6 **Q. And how did that go to those teachers and**
7 **counselors?**

8 A. Via e-mail.

9 **Q. So when a student was suspended, an**
10 **e-mail would go -- so, for instance, if a student is**
11 **suspended and you are the assistant principal**
12 **responsible for that suspension, you would send an**
13 **e-mail to every teacher on that kid's schedule saying,**
14 **John Smith has been suspended for three days, he is**
15 **allowed back at school starting blank date?**

16 A. My secretary would.

17 **Q. Your secretary would send that e-mail?**

18 A. Correct. Uh-huh.

19 **Q. Okay. And would that e-mail explain the**
20 **reason for the suspension?**

21 A. It did not.

22 **Q. It just said this person was suspended?**

23 A. Correct.

24 **Q. Okay. Would you generally follow up --**
25 **well, strike that.**

48

1 **Do you know -- did the other assistant**
2 **principals follow the same practice that you just**
3 **described or do you know?**

4 A. I don't know.

5 **Q. Would you copy the other assistant**
6 **principals and the principal on the e-mail that you**
7 **sent to the teachers?**

8 A. No, they were not copied by the
9 secretary.

10 **Q. Okay. Those suspensions would instead be**
11 **discussed at the weekly administrative meetings that**
12 **happened on Monday mornings?**

13 A. Correct.

14 **Q. Got it. Would -- let me come at it a**
15 **different way. Telling the teachers that a kid has**
16 **been suspended, but not how or why, why did you not**
17 **convey to the -- strike that. That's a terrible**
18 **question. Let me start over.**

19 **Why did you not convey to a student's**
20 **teachers the reasons behind a student suspension?**

21 A. Probably to protect the student's rights.
22 The right of confidentiality was the premise that I
23 operated under.

24 **Q. Okay. And the reason I'm asking the**
25 **question is the purpose of this state law requirement**

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1 is to protect and to keep school personnel apprised of
 2 situations that could pose a risk to the safety and
 3 welfare of others. Do you see that? And that's in
 4 the student code of conduct, right?
 5 A. Correct.
 6 Q. And telling a teacher, John Smith has
 7 been suspended, gives at teacher a certain amount of
 8 information, correct?
 9 A. Correct.
 10 Q. But telling that teacher John Smith has
 11 been suspended because he was caught with a handgun in
 12 his backpack gives that teacher a lot more
 13 information, right, and would do a better job of
 14 informing that teacher that there is a risk to the
 15 safety and welfare of others, right?
 16 MR. EVERALL: Object to the form.
 17 Q. (BY MR. ROCHE) You can go ahead and
 18 answer. Oh, sorry, I figured you guys had covered
 19 that.
 20 A. No, I thought he said --
 21 THE DEPONENT: Did you say you object?
 22 MR. EVERALL: Yes, I did, but you can
 23 answer the question.
 24 Q. (BY MR. ROCHE) So the way depositions
 25 work is Steve has the right to object to questions he

50

1 thinks I've asked that are --
 2 A. Okay.
 3 Q. -- phrased badly or legally
 4 unintelligible, but if -- you can answer questions
 5 unless Steve tells you don't answer.
 6 A. Okay.
 7 Q. And trust me, if he tells you, Don't
 8 answer, you'll know. Okay. So let me start over.
 9 What I'm trying to get at is there's a state
 10 requirement that you tell teachers what's going on
 11 with kids so that they can protect themselves and
 12 others?
 13 A. Correct.
 14 Q. And telling teachers a kid has been
 15 suspended but not why doesn't seem to totally fulfill
 16 that objective; don't you agree?
 17 A. Not necessarily.
 18 Q. Okay. Help me understand.
 19 A. Teacher understands that student A is
 20 suspended, not to be on school grounds. Teacher sees
 21 student A on the grounds during the suspension, they
 22 alert someone. You give more information about
 23 student A to the teachers, then student A's parents
 24 find out through the rumor mill that this information
 25 is going out and quite possibly you have violated some

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1 sort of confidentiality.
 2 Q. Well, isn't that covered in this same
 3 document at the bottom paragraph of the section we're
 4 looking at that says, "Any teacher or counselor to
 5 whom disciplinary information is reported shall
 6 maintain the confidentiality of the information and
 7 shall not communicate it to any other person"?
 8 A. That is covered.
 9 Q. So there doesn't seem to me to be any
 10 impediment to telling the teachers why a kid has been
 11 suspended or am I missing something?
 12 A. It's just been general practice since I
 13 was hired at Arapahoe High School.
 14 Q. And is it -- do you know what the general
 15 practice is of the other assistant principals? Do
 16 they also inform the teachers that there has been a
 17 suspension but not inform the teachers of the reason
 18 for the suspension?
 19 A. I don't know that necessarily.
 20 Q. Okay. Let's jump ahead to page LPS 1120.
 21 Have you got that in front of you?
 22 A. I do.
 23 Q. And this is the student code of conduct
 24 policy relating to the use of the Internet?
 25 A. Correct.

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1 Q. And, again, this is a policy that you are
 2 generally familiar with?
 3 A. Generally.
 4 Q. Okay. And down in the bottom half of
 5 this page is a section titled "Personal Responsibility
 6 and Consequences for Misuse." Do you see that?
 7 A. I do.
 8 Q. And in broad strokes, one of the things
 9 it provides is that misuse of the Internet on school
 10 property can be a basis for suspension or expulsion
 11 under certain circumstances, right?
 12 MR. EVERALL: I'm going to object to
 13 that. That's not what it says.
 14 Q. (BY MR. ROCHE) Well, let me ask it more
 15 broadly. Is it your understanding that misuse of the
 16 Internet by a student can be a basis to suspend a
 17 student?
 18 A. Not that I know of.
 19 Q. So, for instance, and I'll give you an
 20 extreme example. If a student is looking at child
 21 porn on his computer in the cafeteria using the
 22 school's Internet system, that student could be
 23 suspended for that, couldn't he or she?
 24 A. Could be.
 25 Q. So misuse of the Internet can be a basis

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1 for suspending a student, correct?

2 A. Can be.

3 Q. And, in fact, that's exactly what this

4 paragraph says. It says, "Unacceptable use of the

5 District Internet system may result in one or more of

6 the following consequences." Do you see that?

7 A. Currently I don't. Where is that?

8 Q. Down at the -- right there.

9 A. "Internet system may result in one or

10 more of the following consequences."

11 Q. Right? And one of those -- do you see

12 that now?

13 A. I do.

14 Q. And one of the consequences that's

15 expressly listed is, "Discipline under other

16 applicable District policies, including suspension and

17 expulsion." Do you see that?

18 A. I do.

19 Q. So, in fact, the student code of conduct

20 does make clear that a student can be suspended or in

21 some cases expelled for unacceptable use of the

22 district Internet system, right?

23 A. It does say that.

24 Q. Okay. Do you know -- and I'll just ask

25 this very broadly. Have any students been suspended

54

1 or expelled for their misuse of the district Internet

2 system during your time at Arapahoe?

3 A. Not that I remember.

4 Q. Okay. Have any kids gotten any kind of

5 discipline from Arapahoe for misuse of the Internet

6 system?

7 A. Generally, they're not allowed to use

8 district equipment to access the Internet.

9 Q. Okay. And the remainder of this section

10 talks about what are the appropriate and permitted

11 uses of the district Internet system, and then it goes

12 on to describe some of the impermissible uses, right?

13 A. Correct.

14 Q. And on page LPS 01121, there's a list of

15 some of the inappropriate uses, right?

16 A. Correct.

17 Q. And one of those inappropriate uses is,

18 "Transmit or receive obscene, abusive, profane, lewd,

19 vulgar, rude, inflammatory, threatening,

20 discriminatory, disrespectful, or sexually explicit

21 language," right?

22 A. It does say that, yes.

23 Q. So you can't transmit or receive

24 threatening language, right?

25 A. Correct.

55

1 Q. It also provides that students are not

2 permitted to access, review, upload, download, store,

3 print, post, or distribute materials that use language

4 or images that are inappropriate in the educational

5 setting or disruptive to the educational process or

6 post information or materials that could cause damage

7 or danger of disruption." Do you see that?

8 A. I do.

9 Q. Okay. It also goes on to say that

10 students are prohibited from accessing, reviewing,

11 uploading, downloading, storing, printing, posting, or

12 distributing materials that use language or images

13 that advocate violence or discrimination towards other

14 people, hate literature, or that may constitute

15 harassment or discrimination, correct?

16 A. Correct.

17 Q. Are you aware of any students at Arapahoe

18 who have ever been disciplined for violating any of

19 those prohibitions on their use of the Internet?

20 A. The previous two, no. The

21 transmit/receive obscene, abusive, profane, lewd,

22 vulgar, rude, inflammatory, basically pornography.

23 Q. Okay. Got it.

24 A. Sexually explicit.

25 Q. That's the only one --

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1 A. That I remember.

2 Q. Those are the only examples that you're

3 aware of?

4 A. Correct.

5 Q. Okay. Fair enough. Now, would you go to

6 the next page, LPS 01122, at the top of the page

7 there's a section titled "Monitoring Activities." Do

8 you see that?

9 A. I do.

10 Q. It says, "The District will monitor

11 online activities by students and will enforce the

12 Student Code of Conduct concerning inappropriate use."

13 Are you familiar with that provision of the code of

14 conduct?

15 A. Yes, I am familiar.

16 Q. And I'm guessing you're not the guy who

17 monitors online activities by students?

18 A. I am not.

19 Q. Do you know who is and how they do it?

20 I'm just trying to figure out who I should be asking

21 that question of --

22 A. I don't.

23 Q. -- because I know it's not you.

24 A. Yeah, I don't know.

25 Q. If you go a little bit farther down the

57

1 page, it talks about a limited expectation of privacy,
 2 do you see that? Right in the middle of the page.
 3 A. I do.
 4 Q. And in that section of the code of
 5 conduct, it provides, "While authorizing the use of
 6 the District Internet system, the District
 7 nevertheless retains control over materials on the
 8 system or contained in files on the system including
 9 the right to review all materials and files." Do you
 10 see that?
 11 A. I do.
 12 Q. Now, that reads to me like the school has
 13 the right to search a student's Internet usage. Am I
 14 reading that right or do you know?
 15 A. I don't know.
 16 Q. Okay. Who is the right person to ask
 17 that question of, because I understand it's probably
 18 not you?
 19 A. I don't know.
 20 Q. Okay. You're getting some of these
 21 questions just because you're first up.
 22 A. Yea, me.
 23 Q. Exactly. Okay. I think that's all I've
 24 got on the code of conduct. We may refer back to it.
 25 So just leave it there.

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1 A. Okay.
 2 Q. We've been going a little over -- almost
 3 an hour and a half. Do you want to take five minutes
 4 and grab a break?
 5 A. That would be great.
 6 (Recess taken, 10:57 a.m. to 11:13 a.m.)
 7 Q. (BY MR. ROCHE) Before I forget, I don't
 8 think I have a document specific to this. I wanted to
 9 ask about Safe2Tell. You're familiar with the
 10 Safe2Tell program?
 11 A. I am.
 12 Q. My question is, what in the 2013 time
 13 period did Arapahoe do to train the students on the
 14 Safe2Tell program, if anything?
 15 A. I don't specifically remember anything
 16 specific --
 17 Q. Okay.
 18 A. -- except for mentioning it in class
 19 meetings at the very first day of school and then
 20 posters around the school.
 21 Q. Okay. I understand there were posters in
 22 different locations around the school and the
 23 cafeteria and in some of the hallways. I'm really
 24 interested in some of the discussions on the first day
 25 of school. Were there any handouts given to the

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1 students about Safe2Tell?
 2 A. It may have been on the back of the
 3 student ID that year.
 4 Q. Okay. And when you say the first day of
 5 school there was some discussion of it, was it with
 6 the teachers or was it in an assembly? Help me
 7 understand sort of --
 8 A. The first day of school is class
 9 meetings. So every group of kids. 9th graders come
 10 in, they meet all of the administrators, everyone has
 11 speaking points, 10th grade, 11th grade, 12th grade.
 12 Q. So it was a grade-by-grade assembly in
 13 the gym?
 14 A. It's in the theater.
 15 Q. In the theater. I'm sorry. And who,
 16 generally if you recall, would talk about Safe2Tell?
 17 A. I don't remember. Generally, we go over
 18 the information on the back of the ID though. It has
 19 the attendance line, it has suicide prevention
 20 hotline, and I believe Safe2Tell is on there.
 21 Q. Okay.
 22 A. And it may have been the grade level
 23 administrator or it may have been Natalie.
 24 Q. Okay. And is that -- because I've been
 25 referring to the assistant principals as the person

60

1 with the class. Is grade level administrator the term
 2 that the school uses for --
 3 A. Yeah, grade level assistant principal.
 4 Q. Okay. Got it. Thank you. Beyond that
 5 sort of first day assembly walkthrough of the back of
 6 the student ID, was there any other training provided
 7 on Safe2Tell to the students?
 8 A. No. Also, I believe that year we ran a
 9 daily -- the daily announcements were always in the
 10 cafeteria projected on a large screen that's on the
 11 south end of the cafeteria.
 12 Q. Okay.
 13 A. And I believe Safe2Tell was a slide that
 14 went on one of the days.
 15 Q. Okay.
 16 A. So information that was on that slide,
 17 briefly described what Safe2Tell was, how to use it.
 18 It was an anonymous way to help Warriors take care of
 19 one another.
 20 Q. Okay.
 21 A. I believe that's what it said.
 22 Q. Okay. And I guess one of the inferences
 23 I'm drawing from our discussion on Safe2Tell is if it
 24 was not on the back of the student ID, it probably was
 25 not discussed on that first day assembly of each grade

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1 level?

2 A. Correct.

3 Q. Okay.

4 A. And then it would have been just the

5 weekly announcements and the posters throughout the

6 building.

7 Q. Okay. Perfect.

8 (Deposition Exhibit 2 was marked.)

9 Q. And I will tell you about -- 2 is an

10 excerpt of the Arapahoe High School Student

11 Planner/Handbook for the 2013-2014 school year, and

12 I've only got a couple of pages attached to it. So

13 first let me ask you, are you familiar with the

14 student planner handbook that is distributed to the

15 kids --

16 A. I am.

17 Q. -- every academic year? What is it?

18 A. Well, it's basically -- the majority of

19 it is a calendar.

20 Q. Okay.

21 A. An old-fashioned --

22 Q. Like a paper calendar?

23 A. I say "old-fashioned." Day-Timer, pocket

24 size, backpack size, compact Day-Timer for the

25 students to use.

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1 Q. Okay. And --

2 A. That's the majority of it.

3 Q. And then at the back of it is some of the

4 code of conduct and rules of the school and some other

5 materials like that?

6 A. That's the front.

7 Q. That's the front. Okay. And, again, one

8 of the things that's in the front of the student

9 planner is a section on what the school's searching

10 policies are, right? And that's the excerpted page

11 that I've attached here.

12 A. Can I have a minute to read it?

13 Q. Sure.

14 A. Okay.

15 Q. And my questions on this are really

16 pretty minimal. First, again, this is a document that

17 made clear to both the students and to the staff at

18 Arapahoe that the school had the right to search the

19 students, their lockers, their cars, their belongings

20 if there was a reasonable suspicion that they were up

21 to no good; is that right?

22 A. Well, these pages specifically outline

23 lockers, vehicles, and then lockers again.

24 Q. Okay.

25 A. And then it states, "Backpacks may be

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1 searched. Therefore, no student has a reasonable

2 expectation of privacy of on in the lockers, desks,

3 and other storage areas made available." I mean,

4 they're basically -- what this is basically saying is

5 school district property is school district property.

6 You're almost leasing it.

7 Q. Okay.

8 A. I guess for a better term.

9 Q. Got it. Fair enough. And then the last

10 page of this talks about the fact that under the safe

11 schools legislation school administrators have the

12 authority to impose discipline for conduct that occurs

13 after school hours and off school property, right?

14 A. Correct.

15 Q. And that was your understanding as an

16 assistant principal of the breadth of the authority

17 that the administration at Arapahoe High School had,

18 right?

19 A. My understanding is that it had to be

20 linked to the school in some fashion.

21 Q. Okay. If there is behavior that is

22 linked to the school in some fashion, a kid can be

23 suspended or expelled, even if that conduct or

24 behavior occurs away from school property or on a

25 weekend, right?

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1 A. Correct.

2 (Deposition Exhibit 3 was marked.)

3 Q. And Exhibit 3 is the staff handbook

4 that's provided to students and administrator --

5 sorry, strike that. To teachers and administrators --

6 A. Correct.

7 Q. -- at the beginning of the academic year?

8 A. Correct.

9 Q. And if you jump ahead to page LPS 01408,

10 it refers to the student planner that we were just

11 talking about, right?

12 A. It does.

13 Q. So it incorporates the policies that are

14 outlined in the student planner into the staff

15 handbook, right?

16 MR. EVERALL: He's asking for your

17 understanding.

18 A. Correct. I mean --

19 Q. (BY MR. ROCHE) And -- go ahead.

20 A. Without having it next to me, I can't say

21 it's 100 percent.

22 Q. Sure. But was it your understanding or

23 your expectation as the assistant principal at

24 Arapahoe that the teachers would be familiar with the

25 code of conduct that we've looked at and the student

65

1 planner policies that are outlined in the documents
 2 that's given to the student?
 3 A. Correct.
 4 Q. And one of the things they're supposed to
 5 know is what rights and powers they have under those
 6 policies, correct? So what they're allowed to do and
 7 not allowed to do?
 8 A. For the faculty.
 9 Q. For the faculty, yes.
 10 A. In general terms, yeah, I mean, yeah.
 11 Q. And if they had questions about those
 12 kinds of things, then the faculty members, the
 13 teachers, should come talk to an administrator?
 14 A. Correct.
 15 Q. Because the administrators are expected
 16 to be more familiar with those district and school
 17 policies than the teachers are?
 18 A. Correct.
 19 Q. Got it. Okay. See, I told you we would
 20 pick up speed.
 21 (Deposition Exhibit 4 was marked.)
 22 Q. Can you tell me what Exhibit 4 is?
 23 A. Without looking through the entire
 24 document, it would appear to be the slide show from
 25 the Littleton Public School threat assessment

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1 training.
 2 Q. And that's what it looks like to me as
 3 well. And you'll see it's got a date on the front of
 4 it that says spring 2011. My question is, can you
 5 tell me -- do you know when the -- first off, have you
 6 seen this document before?
 7 A. I haven't seen the document. I believe
 8 I've seen the slides.
 9 Q. So you've seen this presentation that is
 10 contained --
 11 A. Yes.
 12 Q. -- in this document?
 13 A. Yes.
 14 Q. Okay. Have you seen it more than once?
 15 A. I believe I have.
 16 Q. Okay. And although it's very hard to
 17 read, it's got the LPS document numbers in the lower
 18 right-hand corner.
 19 A. Okay.
 20 Q. I'm going to try to refer to those as we
 21 walk through it if it is helpful, but for starters,
 22 can you tell me, if you know, who prepared this slide
 23 show?
 24 A. I don't know.
 25 Q. And this is a training tool that was used

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1 at Arapahoe or LPS?
 2 A. Through the district training.
 3 Q. Okay. And do you recall the first time
 4 you went through the training on this threat
 5 assessment program?
 6 A. Well, this specifically or threat
 7 assessments in general?
 8 Q. Well, that's a good question. Let's say
 9 threat assessments in general, and then we'll talk
 10 about this document specifically.
 11 A. I believe we had a training -- I had a
 12 training probably the summer of 2001 or maybe the fall
 13 of 2001.
 14 Q. Okay. And obviously it wasn't this one
 15 because this document wasn't created then?
 16 A. Correct.
 17 Q. And did you have annual threat assessment
 18 training after 2001?
 19 A. Yes. It was generally combined with
 20 suspension and expulsion training.
 21 Q. Okay. Now, let's talk about this
 22 training program.
 23 MR. EVERALL: The 2011 one?
 24 MR. ROCHE: The 2011 one.
 25 Q. (BY MR. ROCHE) Do you know how -- strike

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1 that.
 2 Do you know when you went through this
 3 training, were you given a copy of this presentation?
 4 A. Not in written form.
 5 Q. It was just projected on a slide and --
 6 A. And it may have been shared
 7 electronically.
 8 Q. Okay. Do you know whether or not you
 9 have an electronic copy of this?
 10 A. I don't know that.
 11 Q. Do you know if you took any notes of
 12 thoughts you had as you went through this training
 13 program?
 14 A. No, I don't.
 15 Q. Okay. Do you know who at Arapahoe has
 16 taken the training that's reflected in Exhibit 4?
 17 A. Do I know specifically?
 18 Q. Yes.
 19 A. No, I do not.
 20 Q. When you first went through the threat
 21 assessment best practices and procedures training
 22 embodied in Exhibit 4, who else was with you from
 23 Arapahoe?
 24 A. I don't remember.
 25 Q. Do you know in general whether or not

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1 **this training was made -- I think we covered this,**
 2 **sorry. This training was made available to the**
 3 **administrators, right?**
 4 A. Correct.
 5 **Q. Was it mandatory back in 2011?**
 6 A. I believe so. Not to say that people may
 7 have missed it.
 8 **Q. Okay. Is it mandatory now in 2015?**
 9 A. Yes.
 10 **Q. Was there a change in the requirements**
 11 **for undergoing threat assessment training after the**
 12 **shooting in December 2013?**
 13 A. Yes.
 14 **Q. Okay. What was the change?**
 15 A. I believe mandatory was mandatory.
 16 **Q. So --**
 17 A. If you missed it, they made sure that you
 18 rescheduled.
 19 **Q. Okay. So the mandatory component of it**
 20 **was -- after the shooting was actually enforced; is**
 21 **that what you're saying?**
 22 MR. EVERALL: Object to form.
 23 **Q. (BY MR. ROCHE) You can go ahead.**
 24 A. I didn't miss it from 2011 on, so I don't
 25 know.

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1 **Q. Okay. And, again, I'm --**
 2 A. So mandatory to me means you show up, so
 3 I would show up. Some people have a variety of
 4 circumstances that come up, and they may miss the
 5 meeting. It was offered generally two or three times
 6 in the fall, and I'm sure there were administrators
 7 throughout the district who missed the meeting.
 8 **Q. Okay.**
 9 A. And I don't know how that was addressed.
 10 **Q. Okay. But it was -- your understanding**
 11 **was this threat assessment training was supposed to be**
 12 **mandatory back in 2011?**
 13 A. Yes.
 14 **Q. And after the shooting at Arapahoe High**
 15 **School, the district was stricter in enforcing the**
 16 **mandatory element of requiring administrators to**
 17 **attend this?**
 18 A. Correct.
 19 **Q. Got it. How long of a presentation was**
 20 **this? This is a lot of slides. Half a day is my**
 21 **guess or an all-day thing?**
 22 A. No. I believe it was a three-hour
 23 training.
 24 **Q. Okay. And when we talked generally about**
 25 **threat assessment training prior to the shooting, you**

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1 **said that this was for administrators only?**
 2 A. Uh-huh.
 3 **Q. After the shooting, the group that was**
 4 **provided this training was expanded to include the**
 5 **campus supervisors and the SRO, right?**
 6 A. Correct.
 7 **Q. Did it -- was it also expanded to include**
 8 **school counselors?**
 9 A. Yes.
 10 **Q. Was it also expanded to include school**
 11 **psychologists?**
 12 A. I know they're included. They may have
 13 received this training prior to 2013.
 14 **Q. Okay. And that was going to be my next**
 15 **question. You know for certain that school**
 16 **psychologists now receive this training, and they may**
 17 **have received it prior to 2013, you just don't know?**
 18 A. I do not know.
 19 **Q. Okay. Fair enough. And teachers are not**
 20 **provided this training, but if they ask, they would**
 21 **probably be allowed to attend; that's your best guess?**
 22 A. Yes.
 23 **Q. Okay. Let's jump into the document and,**
 24 **again, I apologize it's so dark. But if you'll go to**
 25 **page 4079 it's, I don't know, four or five page s**

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1 **back. It's titled "Goals for Today." There you go.**
 2 A. Okay.
 3 **Q. This talks about, as the title suggests,**
 4 **the goals for this training. And one of those is to,**
 5 **"Confirm the roles and tasks of a building Threat**
 6 **Assessment Team." Do you see that?**
 7 A. I do.
 8 **Q. Now, I read the building threat**
 9 **assessment team to mean the team for an individual**
 10 **school. Is that how you read it?**
 11 A. I do.
 12 **Q. So each building is supposed to have its**
 13 **own threat assessment team, right?**
 14 A. Within limits, I suppose, because at
 15 Arapahoe -- because we have grade level assistant
 16 principals, the team changes.
 17 **Q. Fair comment. And that goes to my next**
 18 **question. Did Arapahoe High School in 2013 have a**
 19 **threat assessment team or teams, plural?**
 20 A. Yes.
 21 **Q. Okay. Who was on the threat assessment**
 22 **team at Arapahoe High School in 2013?**
 23 A. As we discussed, the grade level
 24 assistant principal, school psychologist, possibly
 25 special education teacher if applicable.

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1 **Q. Okay.**
 2 A. Counselor if available.
 3 **Q. Okay.**
 4 A. And school resource officer if available.
 5 **Q. And so the one -- well, anyone else?**
 6 A. No. Well --
 7 **Q. Go ahead.**
 8 A. Teacher if available or wanted to be part
 9 of the process.
 10 **Q. Okay. And is there -- was this more of**
 11 **an ad hoc team that you just described, or is that a**
 12 **team that was formally established through some policy**
 13 **or announcement or document or something to that**
 14 **effect?**
 15 A. It's the guideline. I believe it's
 16 either in -- we might be able to find it in here on
 17 who should be part of the team or it might be at the
 18 front end of the threat assessment.
 19 **Q. Okay. And you're talking about the**
 20 **form --**
 21 A. Correct.
 22 **Q. -- the blank form threat assessment**
 23 **document?**
 24 A. Uh-huh. Who can be involved.
 25 **Q. Right. And there -- you're absolutely**

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1 **right. On the threat assessment form document,**
 2 **there's a list of a whole lot of people who might**
 3 **potentially be involved?**
 4 A. Correct.
 5 **Q. But that's different from the question**
 6 **that I'm trying to ask.**
 7 A. Okay.
 8 **Q. The question I'm trying to ask is, did**
 9 **Arapahoe actually have a defined team of people in**
 10 **place, or did they just use the form and say, Well,**
 11 **jeez, these are the people who are supposed to be**
 12 **here, so let's see who we can round up?**
 13 A. I guess you're looking for consistency.
 14 The consistent members of the team would be the school
 15 psychologist and the assistant principal for that
 16 grade level.
 17 **Q. Okay. Now, let's jump ahead to page**
 18 **4082, if we could, which talks about, "Why do we have**
 19 **districtwide student threat assessment procedures?"**
 20 **Do you see that?**
 21 A. I do.
 22 **Q. Let's start with the most basic question**
 23 **which is, what are the districtwide student threat**
 24 **assessment procedures, if you know? Is that a**
 25 **document that exists somewhere?**

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1 A. Not that I remember, no.
 2 **Q. Okay. Do you have an understanding of**
 3 **what the districtwide student threat assessment**
 4 **procedures refers to?**
 5 A. Quite possibly could be mistyped.
 6 **Q. Okay.**
 7 A. Student threat assessment training
 8 perhaps might be more accurate. I don't know.
 9 **Q. And it may -- I don't know if it refers**
 10 **to, for instance, the standard threat assessment form**
 11 **document that gets filled out with one of these. I**
 12 **just don't know. I'm asking if you are aware of**
 13 **something other than that?**
 14 A. That would be, I think, a safe
 15 interpretation to the training. I think they're
 16 saying procedures probably refers to this training and
 17 the threat assessment as the document, as the guide as
 18 you go through a threat assessment.
 19 **Q. All right. And then same question with**
 20 **respect to the first bullet point here that says,**
 21 **"Common guidelines provide a structured and**
 22 **comprehensive method for evaluating danger and risk."**
 23 **Do you know what those guidelines are that are**
 24 **referred to there?**
 25 A. I believe it's the document, the threat

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1 assessment document.
 2 **Q. That blank form?**
 3 A. Uh-huh.
 4 **Q. Okay. And at the end of this slide,**
 5 **explaining why there are districtwide student threat**
 6 **assessment procedures, the last bullet point says,**
 7 **"Protocols provide a way to document the nature of the**
 8 **threat and our response." Do you see that?**
 9 A. I do.
 10 **Q. And are there any written protocols that**
 11 **you're aware of that provide a way to document the**
 12 **nature of the threat and the schools -- or the**
 13 **district's response other than the generic threat**
 14 **assessment form?**
 15 A. Current protocols or --
 16 **Q. Let's say -- let's break that out. Prior**
 17 **to 2013.**
 18 A. Were there written protocols, not that I
 19 remember.
 20 **Q. Okay. And since the shooting, the school**
 21 **has changed that and has adopted some --**
 22 A. I believe --
 23 **Q. -- newer protocols?**
 24 A. -- the district has written protocol or
 25 guideline on warning signals, I guess, signs.

77

1 **Q. Okay.**
 2 A. There quite possibly could be warning
 3 signs that are outlined in this slide show. I don't
 4 know. I mean, obviously, 2011.
 5 **Q. Absolutely. And I get that. And I have**
 6 **those new warning sign documents. Steve has provided**
 7 **those to me --**
 8 A. Okay.
 9 **Q. -- and we'll go through those as well.**
 10 **But when I look at the slide point about documenting**
 11 **the nature of the threat and the school's response,**
 12 **you would agree that's something for the school to do**
 13 **both, right? Not just what is the threat but what are**
 14 **we doing about it?**
 15 A. Correct.
 16 **Q. Okay. And you just mentioned early**
 17 **warning signs, and that's actually one of the issues**
 18 **that's addressed in this training program.**
 19 A. Okay.
 20 **Q. And do you see the very first point under**
 21 **the title, "What does effective Threat Assessment look**
 22 **like?" It says, "School community is aware of Early**
 23 **Warning Signs & reporting procedures," right?**
 24 A. Correct.
 25 **Q. So there's a number of questions that**

78

1 **arise out of that. One, did LPS or Arapahoe do**
 2 **anything to inform the teachers or the student what**
 3 **the early warning signs are that they should be**
 4 **reporting? And, again, I'm talking about the pre 2013**
 5 **time period.**
 6 A. Brief overview the first week of August.
 7 I --
 8 **Q. So the week before classes started?**
 9 A. Correct. Yeah. Principal, either
 10 Natalie or Ron, would talk about behavior issues,
 11 signs, things to look out for. And I would reiterate
 12 or I would say my portion, and then they would
 13 reiterate or emphasize certain points.
 14 **Q. Okay. And --**
 15 A. At times, counseling and the school
 16 psychologist would also talk about a variety of quite
 17 possibly early warning signs, suicide assessment,
 18 danger assessment --
 19 **Q. Okay.**
 20 A. -- that kind of information was given the
 21 first week with faculty before students came.
 22 **Q. Okay. And what about the reporting**
 23 **procedure -- well, strike that.**
 24 **You talked about sort of how early**
 25 **warning signs were communicated to the staff. Was**

79

1 **anything done to let the rest of the school community,**
 2 **the students, the parents, et cetera, know what early**
 3 **warning signs to be on the lookout for?**
 4 A. Pre 2013?
 5 **Q. Yes.**
 6 A. There may have been. School newsletter
 7 has a variety of information in it.
 8 **Q. Okay.**
 9 A. I know the school psychologist generally
 10 has a section about every other newsletter.
 11 **Q. Okay.**
 12 A. So back in 2013, I believe we were still
 13 mailing it on a monthly basis. So there may have been
 14 information in that just from the school to the parent
 15 community or the community in general, because anybody
 16 can get the newsletter --
 17 **Q. Sure.**
 18 A. -- on, Hey, kids get stressed, here is
 19 what to look for. James also has -- or the SRO, James
 20 Englert, would have a section every other month as
 21 well.
 22 **Q. Okay. And what about -- what training**
 23 **was provided -- and we'll break it into categories**
 24 **now. What training was provided to the teachers about**
 25 **the procedures for reporting when they saw an early**

80

1 **warning sign that concerned them about a student?**
 2 A. Well, the -- the training I guess was
 3 just verbal information.
 4 **Q. So just tell the assistant principal for**
 5 **that class?**
 6 A. Yeah, first week of August, Hey, these
 7 are some things you should look for. If this shows up
 8 in your classroom, this is an assignment, let someone
 9 know.
 10 **Q. Okay.**
 11 A. Being an administrator, counselor, school
 12 psychologist.
 13 **Q. Okay. Now, one of the things you**
 14 **mentioned was if something shows up on an assignment,**
 15 **were the teachers trained or instructed that, Hey, if**
 16 **a kid writes something that gives you concern, whether**
 17 **it's about suicide or violence or drugs or whatever,**
 18 **you should come talk to an administrator about it?**
 19 A. And it was basically that general that
 20 gives you concern.
 21 **Q. Okay. And that's frankly what I would**
 22 **expect. Now, what about the students? Were the**
 23 **students told what the reporting procedures were if**
 24 **they saw something about a classmate that scared them**
 25 **or worried them? Again, whether it was suicide or**

81

1 **other violence?**
 2 A. Specific instruction, not that I
 3 remember.
 4 **Q. Okay. Now, in this slide talking about**
 5 **what an effective threat assessment looks like,**
 6 **there's a bullet point that talks about there being a**
 7 **systematic process to assess the level of concern.**
 8 **Was there a systematic process at Arapahoe to assess**
 9 **the level of concern or was the threat assessment form**
 10 **that systematic process?**
 11 A. That was the beginning of the process.
 12 **Q. Okay. What else went into that**
 13 **systematic process at Arapahoe to assess the level of**
 14 **concern?**
 15 A. Well, I guess the next step was review
 16 with district level director of student services,
 17 director for high school secondary education,
 18 potentially review the information and the threat
 19 assessment with director of special education if
 20 needed, if applicable.
 21 **Q. Okay. And would that be driven by --**
 22 **whether or not a threat assessment went beyond the**
 23 **threat assessment team up to the district level**
 24 **people, would that depend on the initial conclusion**
 25 **reached by the threat assessment team?**

82

1 A. It could.
 2 **Q. And what I mean by that is was there a**
 3 **policy or a practice in effect that said, Any medium**
 4 **or high-level threats had to go to the district for**
 5 **further review, and low-level threats could be**
 6 **resolved and closed at the school level? Anything**
 7 **like that?**
 8 A. Was it in writing, not that I remember,
 9 but I believe it might be on the actual document --
 10 **Q. Okay.**
 11 A. -- without having it here in front of me.
 12 **Q. But certainly the practice was if it was**
 13 **a medium- or high-level threat, it got further review**
 14 **at the district level; is that right? And, again, I'm**
 15 **talking about the 2013 time period.**
 16 A. And some low-level threat assessments may
 17 be reviewed at the district level as well.
 18 **Q. Okay. Now, we can talk about the early**
 19 **warning signs. We're moving a little bit deeper into**
 20 **the slide show, and this is page 4087.**
 21 MR. EVERALL: Could you tell us what the
 22 title of the page is?
 23 MR. ROCHE: Yes. "Early Warning Signs."
 24 It's just a few pages in.
 25 **Q. (BY MR. ROCHE) And what the name of the**

83

1 **slide implies is this is a list of some early warning**
 2 **signs that should be considered in performing a threat**
 3 **assessment, right?**
 4 A. Yes.
 5 **Q. Social withdrawal, right?**
 6 A. Yes.
 7 **Q. Isolation or alienation, feelings of**
 8 **rejection, victims of violence, feeling of being**
 9 **picked on and persecution, et cetera, all of those?**
 10 A. Yeah, I mean, it's a list of everything
 11 we look for.
 12 **Q. Okay. And my question, or one of my**
 13 **questions is, was this list used in performing threat**
 14 **assessments at Arapahoe, and if so, how?**
 15 A. Without having the other document with
 16 me, I'm sure this list that's on this slide is
 17 addressed in the threat assessment document.
 18 **Q. Okay.**
 19 A. So that being the case, I would say, yes.
 20 **Q. Okay. And when Arapahoe performed a**
 21 **threat assessment in 2013, what did it do to make sure**
 22 **it had answers to whether or not all of these -- or**
 23 **any of these early warning signs were present?**
 24 MR. EVERALL: Can I hear that one again?
 25 (The last question was read back as

84

1 follows: "Okay. And when Arapahoe performed a threat
 2 assessment in 2013, what did it do to make sure it had
 3 answers to whether or not all of these -- or any of
 4 these early warning signs were present?")
 5 A. Just to the question where did we get the
 6 information?
 7 **Q. (BY MR. ROCHE) Yes.**
 8 A. From the student, from the parent, from
 9 faculty members who were involved.
 10 **Q. Okay.**
 11 A. From any statements given from any of
 12 those people.
 13 **Q. Okay. And as a standard practice,**
 14 **Arapahoe talked to all of those people, the teachers**
 15 **who were involved, the student, and the parents if**
 16 **they would participate in the process, right?**
 17 A. Correct.
 18 **Q. And it was not a standard practice at**
 19 **Arapahoe in 2013 to go beyond that universe of people**
 20 **to gather information as part of a threat assessment,**
 21 **was it?**
 22 A. Not that I remember, no.
 23 **Q. Okay. And in Karl Pierson's case, a**
 24 **number of these early warning signs were present in**
 25 **the first semester of the 2013-2014 academic year,**

85

1 **right?**
 2 MR. EVERALL: Are you asking him what he
 3 knows now or what he knew then?
 4 MR. ROCHE: Yes, what he knows now.
 5 A. Yeah, what I know now.
 6 **Q. (BY MR. ROCHE) And I can -- let's get**
 7 **that part of this out of the way now. My**
 8 **understanding is you had no involvement in performing**
 9 **or reviewing the threat assessment that was done on**
 10 **Karl Pierson in the fall of 2013; is that right?**
 11 A. Correct.
 12 **Q. Okay. Did you ever discuss with either**
 13 **Kevin Kolasa or Esther Song the threat assessment that**
 14 **was performed on Karl Pierson before the shooting?**
 15 A. No, not that I remember.
 16 **Q. Okay. And if we look at this list now,**
 17 **let's just walk through what -- and, again, I**
 18 **understand this is based on what you know now. Let's**
 19 **walk through and see which of these early warning**
 20 **signs had Karl displayed in the fall of 2013. Had he**
 21 **displayed social withdrawal?**
 22 A. From what I know, I don't think he did.
 23 **Q. What about isolation and alienation?**
 24 A. Not that I know of.
 25 **Q. Feelings of rejection?**

86

1 A. Yes.
 2 **Q. Victim of violence?**
 3 A. Not that I know of.
 4 **Q. Feelings of being picked on and**
 5 **persecuted?**
 6 A. Not that I remember. I don't remember
 7 that being anything mentioned.
 8 **Q. What about low school interest and**
 9 **performance?**
 10 A. No, he was a pretty high achieving kid
 11 until the last semester, from what I remember.
 12 **Q. But in that last semester, and maybe you**
 13 **don't know, and that's okay. That last semester his**
 14 **grades went off a cliff, didn't they? A bunch of F's**
 15 **and a bunch of D's?**
 16 A. From what I remember reading, yes.
 17 **Q. Okay. So that was certainly an early**
 18 **warning sign that was present in Karl's case that last**
 19 **semester of 2013, right?**
 20 A. Depends on when the decline happened. I
 21 mean, if it happened in the third week of November,
 22 right? I mean, I don't know. I would have to see
 23 grade books and timelines before I could really --
 24 **Q. Okay. Fair enough. What about violent**
 25 **expressions in writings and drawings?**

87

1 A. I don't remember if he had any of that.
 2 I mean, writings -- oh, yeah, in writings.
 3 **Q. Certainly he had a journal --**
 4 A. Sure, in his journal.
 5 **Q. -- the school didn't know about prior to**
 6 **the shooting?**
 7 A. Right.
 8 **Q. Do you know, was there any violent**
 9 **expressions in writings and drawings that, for**
 10 **instance, Karl turned in at school that last semester?**
 11 A. Not that I know of.
 12 **Q. Uncontrolled anger, was that an early**
 13 **warning sign that was present in Karl?**
 14 A. I believe so.
 15 **Q. Patterns of chronic and impulsive hitting**
 16 **and intimidating bullying, was that an early warning**
 17 **sign that was present in Karl?**
 18 A. I don't think so.
 19 **Q. History of discipline problems?**
 20 A. Somewhat open for interpretation. Did he
 21 have some? Yes.
 22 **Q. Okay. History of violence and**
 23 **aggression, is that an early warning sign that was**
 24 **present with Karl?**
 25 A. Somewhat.

88

1 **Q. What about intolerance and prejudicial**
 2 **attitudes, was that an early warning sign that was**
 3 **present or that Karl had displayed?**
 4 A. From what I read?
 5 **Q. Yes.**
 6 A. Yes.
 7 **Q. What about drug and alcohol use?**
 8 A. Not that I know of.
 9 **Q. Affiliation with gangs?**
 10 A. Not that I know of.
 11 **Q. Access, possession, and use of firearms?**
 12 A. Yes.
 13 **Q. Okay. And threats of violence, obviously**
 14 **also a yes?**
 15 A. Yes.
 16 **Q. Let's jump ahead to a couple of pages to,**
 17 **"Imminent Warning Signs." It's the next one,**
 18 **actually. There you go. What is your understanding**
 19 **based on having been through this training several**
 20 **times between an early warning sign and an imminent**
 21 **warning sign?**
 22 A. Imminent means some sort of action
 23 required almost immediately.
 24 **Q. Okay. And, again, I'll ask based on what**
 25 **you know now, not what you knew prior to December 13,**

89

1 **which of these imminent warning signs had Karl**
 2 **displayed? Had he displayed or manifested serious**
 3 **physical fighting?**
 4 A. That we knew about? I mean, as the
 5 district knew about, the school knew about? I guess
 6 I'm looking for a little clarity or specificity.
 7 **Q. No, and it's important to get this clear.**
 8 **I am not asking you what the school knew prior to the**
 9 **shooting.**
 10 A. Okay.
 11 **Q. I'm asking what you know now.**
 12 MR. EVERALL: Well, then -- that's a fair
 13 question, but I think to clarify the record as we move
 14 forward, you probably should ask him what the actual
 15 -- say he has information about serious physical
 16 fighting, if you would ask him to explain what he
 17 understands now that information is and the source --
 18 MR. ROCHE: No, of course.
 19 MR. EVERALL: -- I think it would make
 20 things pretty clear.
 21 MR. ROCHE: And I do want to make that
 22 clear because this is important.
 23 **Q. (BY MR. ROCHE) When we talk about**
 24 **serious physical fighting, I want to ask what you know**
 25 **now, not what you knew back in 2013.**

90

1 A. Okay. So no.
 2 **Q. Okay. Severe destruction of property.**
 3 **What do you know about whether Karl had displayed that**
 4 **imminent warning sign?**
 5 A. I don't know of any.
 6 **Q. Okay. What about severe rage for minor**
 7 **reasons? What do you know now about whether Karl had**
 8 **displayed that imminent warning sign?**
 9 A. I think severe rage is kind of open for
 10 -- severe rage for minor reasons, I don't think so.
 11 **Q. Okay. Well, let me ask you, there was --**
 12 **we all know there was an incident on December 11 in**
 13 **Vicki Lombardi's classroom --**
 14 A. Okay. Sure.
 15 **Q. -- where Karl was banging on the door**
 16 **very loudly.**
 17 A. Right.
 18 **Q. It was severe enough that it frightened**
 19 **students and caused Ms. Lombardi to kick him out of**
 20 **class for what I would characterize as a minor reason.**
 21 A. Right. And then --
 22 **Q. So my question is --**
 23 A. So severe rage for me is probably
 24 different than everyone else at the table.
 25 **Q. Okay.**

91

1 A. That's what I mean. It's open for, I
 2 guess, interpretation.
 3 **Q. Okay.**
 4 A. Does that make sense? Severe rage --
 5 because severe rage is different for -- it's totally
 6 open for interpretation is how I look at it.
 7 **Q. And I understand that, and I think that's**
 8 **-- candidly that's a fair statement.**
 9 A. Okay.
 10 **Q. So my question to you is, did you**
 11 **consider Karl's behavior on December 11, 2013, to be a**
 12 **display of severe rage for a minor reason as it's**
 13 **described in this training document?**
 14 MR. EVERALL: And, again, you put that in
 15 the past tense. You said, "did you consider."
 16 **Q. (BY MR. ROCHE) Do you, sorry.**
 17 A. Okay. So do I consider that event severe
 18 rage, no, I do not.
 19 **Q. Okay. Detailed and serious threats of**
 20 **lethal violence, is that an imminent warning sign that**
 21 **Karl displayed in the fall of 2013?**
 22 A. That I know about now, yes.
 23 **Q. Okay. Well, let me ask, did you know**
 24 **about the threat that Karl made in the fall of 2013,**
 25 **in the fall of 2013? Did you know about it at the**

92

1 **time it was made?**
 2 A. I knew of the threat.
 3 **Q. Okay.**
 4 A. Was it detailed and serious? Again, it's
 5 open for interpretation.
 6 **Q. Okay.**
 7 A. Because at whatever -- September 3?
 8 **Q. Is when the threat occurred, yes.**
 9 A. I wouldn't consider it detailed.
 10 **Q. Okay. And then what about the last two**
 11 **imminent warning signs? Possession and/or use of**
 12 **weapons?**
 13 A. Did Karl have those?
 14 **Q. Did he display that imminent warning sign**
 15 **in 2013?**
 16 A. That I know of now, yes, he did.
 17 **Q. And prior to the shooting, you were not**
 18 **aware of that imminent warning sign?**
 19 A. I was not.
 20 **Q. And same with self-injurious behaviors or**
 21 **threats of suicide?**
 22 A. I did not have that knowledge.
 23 **Q. Did Karl ever engage in any**
 24 **self-injurious behavior or threats of suicide that you**
 25 **know now prior to the shooting?**

93

1 A. Not that I know of.
 2 **Q. Okay.**
 3 MR. EVERALL: Mike, I want to -- if I
 4 could just make this clear. Would you ask him if he
 5 knew, if Mr. Meredith knew, that Karl possessed and/or
 6 used weapons prior to December 13?
 7 MR. ROCHE: Yes, that's fine.
 8 MR. EVERALL: Just so it's really clear.
 9 MR. ROCHE: I'll ask it more broadly than
 10 that.
 11 MR. EVERALL: Okay. Sure.
 12 **Q. (BY MR. ROCHE) To the best of your**
 13 **knowledge, did anyone at Arapahoe High School know --**
 14 **well, strike that. Let me be more precise.**
 15 **To the best of your knowledge, did any**
 16 **staff, faculty member, or administrator know that Karl**
 17 **Pierson possessed or had access to a firearm prior to**
 18 **December 13?**
 19 A. No.
 20 **Q. Let's jump ahead to page -- man, those**
 21 **are hard to read. LPS 004094, and the heading is**
 22 **"Threat Assessment Team Members."**
 23 A. Okay. Is that the right one?
 24 **Q. That's the right one. I had the picture**
 25 **covered so I was thrown off.**

94

1 MR. EVERALL: What was this picture known
 2 as?
 3 THE DEPONENT: The Mod Squad.
 4 **Q. (BY MR. ROCHE) Is that what it is?**
 5 A. I believe that's what it was.
 6 **Q. This slide talks about who should be on**
 7 **the threat assessment team, correct?**
 8 A. Uh-huh.
 9 **Q. And first it says there should be a**
 10 **leader, right?**
 11 A. Correct.
 12 **Q. And that's either the principal or the**
 13 **administrator or the dean, correct?**
 14 A. Correct.
 15 **Q. One question, did Natalie Pramenko ever**
 16 **participate in threat assessments as the principal of**
 17 **Arapahoe High School?**
 18 MR. EVERALL: Prior to December 2013?
 19 MR. ROCHE: Yes.
 20 A. I don't know.
 21 **Q. (BY MR. ROCHE) Has she --**
 22 A. To the best of my memory, I really can't
 23 answer that.
 24 **Q. Okay. You're not aware of any threat**
 25 **assessments that she was involved in in her capacity**

95

1 **as principal prior to December 13, 2013?**
 2 A. Yeah, I don't have that information.
 3 **Q. Okay.**
 4 A. I mean, eventually she was.
 5 **Q. And that occurred after the shooting, she**
 6 **became more --**
 7 A. No. No. I guess I'm looking for
 8 clarification of the question. So was she directly
 9 involved in the interview process? Is that what
 10 you're looking for?
 11 **Q. Sure. Let's start with that.**
 12 A. And I don't know that.
 13 **Q. Okay.**
 14 A. What I do know is that she was involved
 15 at the conclusion of a threat assessment.
 16 **Q. Okay. Well, let's talk about that**
 17 **because that I'm definitely interested in. When a**
 18 **threat assessment form is filled out, who gets it?**
 19 **Who gets copies of it and what is done with it?**
 20 A. Well, school psychologist, the grade
 21 level assistant principal, the parent, the director of
 22 student services, and I believe it's reviewed with the
 23 principal. I don't know if the principal gets an
 24 exact copy.
 25 **Q. You don't know if the principal gets a**

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1 **copy?**
 2 A. Correct.
 3 **Q. Okay. Prior to -- well, were you talking**
 4 **about the pre December 2013 world --**
 5 A. I was.
 6 **Q. -- at Arapahoe?**
 7 A. Uh-huh.
 8 **Q. And in the post December 2013 world at**
 9 **Arapahoe, are threat assessments given to Natalie**
 10 **Pramenko for review?**
 11 A. For review, I don't know if she has an
 12 actual hard copy. I don't know if she keeps the hard
 13 copy.
 14 **Q. But does she get a copy of every threat**
 15 **assessment that is done now?**
 16 A. I guess two questions. Does she review
 17 them, yes. Does she get a hard copy, I don't know.
 18 **Q. Okay. And I'm more interested in the**
 19 **review process, rather than is she doing it**
 20 **electronically or --**
 21 A. Right. So review, yes.
 22 **Q. And who provides the principal with the**
 23 **threat assessment so that she can review it?**
 24 A. I would -- I believe it's either the
 25 school psychologist or the grade level assistant

97

1 principal.

2 **Q. Okay. Now, in looking at this list of**

3 **team members for a threat assessment in addition to**

4 **the leader, it talks about a safety mental health**

5 **expert, that's the school psychologist or the**

6 **counselor, right?**

7 A. Correct.

8 **Q. So in the pre 2013 world, that would be**

9 **either Esther Song or Kelly Talen or Astrid, correct?**

10 A. Correct.

11 MR. EVERALL: Astrid Thurnau.

12 MR. ROCHE: Thurnau, T-h-u-r-n-a-u.

13 **Q. (BY MR. ROCHE) And team members are also**

14 **recommended to include someone who knows a student.**

15 **Do you see that?**

16 A. I do.

17 **Q. A parent, a teacher, a case manager?**

18 A. Correct.

19 **Q. And the next person is a recorder. Do**

20 **you see that?**

21 A. I do.

22 **Q. And that person's -- that team member's**

23 **job is to document and keep records for future**

24 **reference. Do you see that?**

25 A. I do.

98

1 **Q. Who on the Arapahoe threat assessment**

2 **team was tasked with being the recorder?**

3 A. Could have been anyone. Assistant

4 principal, school psychologist, or counselor.

5 **Q. So how was it decided who was going to**

6 **keep the records of a threat assessment?**

7 A. The person who is more comfortable with

8 the document.

9 **Q. And when you say "the document," are you**

10 **talking about the form threat assessment document?**

11 A. Uh-huh.

12 **Q. What about any other documents or records**

13 **that are generated as part of a threat assessment?**

14 **So, for instance, a witness statement from a teacher**

15 **or a fellow student?**

16 A. Who would keep track of those?

17 **Q. Yes.**

18 A. Those generally would come through the

19 assistant principal.

20 **Q. Okay. And would they be kept together**

21 **with the threat assessment document itself?**

22 A. Not necessarily.

23 **Q. Okay. And so, for instance, with respect**

24 **to the threat assessment that was done when Karl**

25 **Pierson made the threat against Tracy Murphy that he**

99

1 **made, were any written statements collected from Tracy**

2 **Murphy to your knowledge?**

3 A. I don't know.

4 **Q. What about from Mark Loptien who heard**

5 **the threat?**

6 A. I don't know.

7 **Q. What about from Barbara Pierson who was**

8 **there when her son made the threat?**

9 A. I don't know.

10 **Q. Okay. And the last bullet point on the**

11 **slide describing the threat assessment team members**

12 **says when needed, you can include a district**

13 **administrator, SRO, law enforcement, DHS -- which is**

14 **human services, right?**

15 A. Uh-huh correct.

16 **Q. -- probation, or private therapist,**

17 **right?**

18 A. Correct.

19 **Q. At Arapahoe High School who makes the**

20 **decision when those additional people need to be added**

21 **to a threat assessment team?**

22 A. Who makes the decision? The assistant

23 superintendent as the leader.

24 **Q. Assistant principal?**

25 A. What did I say? Superintendent?

100

1 **Q. Yes. That's fine. I don't want you to**

2 **throw Mr. Jones under the bus.**

3 MR. EVERALL: He wasn't even there.

4 A. Maybe my blood sugar is getting low. So,

5 yeah, the leader of the team, which is the assistant

6 principal, I'm sorry. And sometimes it's the parent.

7 A parent, for example, may bring in --

8 **Q. (BY MR. ROCHE) Outside therapist or**

9 **somebody like that?**

10 A. Correct. Or an advocate if they think

11 they're being, I guess, aggressively confronted, I

12 suppose, by doing a threat assessment. Some parents

13 don't like it, and they have had -- they brought in

14 their own advocate.

15 **Q. Okay. Let's jump ahead to page 496.**

16 **It's the Littleton Public Schools threat assessment**

17 **process.**

18 A. Okay.

19 **Q. Got it?**

20 A. I do.

21 **Q. And it walks through seven numbered steps**

22 **that make up the threat assessment process, right?**

23 A. Correct.

24 **Q. First one is, "Establish safety -Isolate**

25 **the student"?**

101	<p>1 A. Correct.</p> <p>2 Q. Second is, "Make immediate</p> <p>3 notifications," and that refers, I presume -- I guess</p> <p>4 tell me, if there has been a threat made, tell the</p> <p>5 targets of the threat what's going on or does it refer</p> <p>6 to something else?</p> <p>7 A. That and parents.</p> <p>8 Q. So tell the parents that their kid made a</p> <p>9 threat and they've got to go through this process?</p> <p>10 A. Correct. That's generally the first</p> <p>11 phone call because the immediate concern is the safety</p> <p>12 of the student themselves.</p> <p>13 Q. Okay. And then the next bullet point is</p> <p>14 to, "Activate team members, clarify the plan." Do you</p> <p>15 see that?</p> <p>16 A. I do.</p> <p>17 Q. How is that done?</p> <p>18 A. Either verbally or through e-mail.</p> <p>19 Activate team members is basically when can we get</p> <p>20 together in the next 24 hours and go through this</p> <p>21 threat assessment on this student.</p> <p>22 Q. Okay. And then clarifying the plan, what</p> <p>23 does that refer to?</p> <p>24 A. Just that. I think the plan. When are</p> <p>25 we going to all be able to coordinate our calendars,</p>	103
102	<p>1 carve out some time because it can be fairly lengthy.</p> <p>2 Q. Okay. Well, that actually raises sort of</p> <p>3 a tangent that I'm interested in. How long do these</p> <p>4 threat assessments generally take? I mean, are we</p> <p>5 talking 30 minutes or three hours or somewhere in</p> <p>6 between?</p> <p>7 A. That's a safe range.</p> <p>8 Q. Okay. Are most of them under an hour?</p> <p>9 A. I don't think so.</p> <p>10 Q. Okay. The next step in this process is,</p> <p>11 "Collect and review all information." Do you see</p> <p>12 that?</p> <p>13 A. I do.</p> <p>14 Q. And who is primarily responsible for</p> <p>15 doing that?</p> <p>16 A. Shared responsibility, I think, through</p> <p>17 all the team members. So you would have, again, the</p> <p>18 assistant superintendent, school psychologist -- I</p> <p>19 said it again.</p> <p>20 Q. Assistant principal.</p> <p>21 A. Assistant principal. I'm sorry.</p> <p>22 Q. You know what, I'll catch you. It's</p> <p>23 okay.</p> <p>24 A. He's giving off a vibe. Assistant</p> <p>25 principal, school psychologist, counselor, teacher, if</p>	104
101	<p>1 applicable.</p> <p>2 Q. Okay.</p> <p>3 A. Anybody who had reliable, pertinent</p> <p>4 information.</p> <p>5 Q. Okay. And what about taking, what I</p> <p>6 would call, next steps as part of this threat</p> <p>7 assessment process? Do team members ever go to the</p> <p>8 next step and search lockers, cars, backpacks,</p> <p>9 electronic media, social media, those kinds of things?</p> <p>10 A. Immediate steps, if we go back to the</p> <p>11 imminent danger signs, yeah. Vehicle, if possible,</p> <p>12 locker. If the student is there, we would search a</p> <p>13 backpack. If an imminent warning -- you know, one of</p> <p>14 the imminent signs was there.</p> <p>15 Q. Okay.</p> <p>16 A. Reasonable suspicion I guess is where you</p> <p>17 come back to.</p> <p>18 Q. Sure.</p> <p>19 A. Right. If you've had multiple, I guess,</p> <p>20 reports of something dangerous in a backpack, you</p> <p>21 would look in the backpack.</p> <p>22 Q. Okay. What about -- well, strike that.</p> <p>23 As part of the threat assessment process,</p> <p>24 does somebody from the team go and speak to all of the</p> <p>25 student's teachers to gather and review information?</p>	104

105

1 **Q. Okay. Different question on the same**
 2 **subject. Do the threat assessment team members**
 3 **ever -- and I'm talking about the pre 2013 world now.**
 4 **Do the threat assessment team members ever reach out**
 5 **to and talk to students about a kid who is the subject**
 6 **of a threat assessment?**
 7 A. Possibly.
 8 **Q. Have you ever done that in a threat**
 9 **assessment that you did prior to 2013?**
 10 A. Yes.
 11 **Q. Okay. And in the post 2013 world, is**
 12 **that something that is a regular part of threat**
 13 **assessments that are performed at Arapahoe?**
 14 A. Standard practice.
 15 **Q. And is that verified or documented**
 16 **somehow?**
 17 A. Yeah, written statements.
 18 **Q. From the students --**
 19 A. Students.
 20 **Q. -- that you speak to?**
 21 A. Correct.
 22 **Q. Do you know whether or not that was done**
 23 **in the case of Karl Pierson?**
 24 A. I don't know.
 25 **Q. Okay. The next step is determining the**

106

1 **level of concern, and it's still in the pre 2013 world**
 2 **there were essentially three categories, right? Low,**
 3 **medium, and high?**
 4 A. Correct.
 5 **Q. And in the post 2013 world, there are**
 6 **still three categories, low, medium, and high; is that**
 7 **right?**
 8 A. I believe that's correct.
 9 **Q. Okay. The next step is developing an**
 10 **action plan. Do you see that?**
 11 A. I do.
 12 **Q. That is part of what is written down on**
 13 **the threat assessment document itself, right, in the**
 14 **pre 2013 world?**
 15 A. Can you ask the question again? Sorry.
 16 **Q. Sure. This slide talks about developing**
 17 **an action plan, right?**
 18 A. Correct.
 19 **Q. And that action plan is written down and**
 20 **a part of the threat assessment document itself,**
 21 **right, or it was back in 2013?**
 22 A. Yeah, I think there's space at the end.
 23 **Q. And that's my recollection as well.**
 24 A. Okay.
 25 **Q. Is there --**

107

1 A. So there's space on the document, which
 2 is basically a typable template. I believe that's how
 3 it was in 2013.
 4 **Q. Okay. Is it different now?**
 5 A. I think it's still a typable template,
 6 but it may have become more user friendly.
 7 **Q. Okay.**
 8 A. Typable template at the end may not have
 9 had enough space for everything that needed to be put
 10 in place, so another document may have been attached.
 11 **Q. Okay.**
 12 A. Especially if it was a special education
 13 student.
 14 **Q. Okay. Fair point. When it comes to**
 15 **developing an action plan, I assume that's a joint**
 16 **effort by all of the team members?**
 17 A. Correct.
 18 **Q. And who is primarily responsible on that**
 19 **threat assessment team to make sure that that action**
 20 **plan is actually implemented?**
 21 A. I think it's a shared responsibility. I
 22 mean, depending on the particular student, a lot of
 23 the action may fall on the parent.
 24 **Q. Okay.**
 25 A. You know, if they're seeing more warning

108

1 signs at home than we're seeing at school, then the
 2 parent might be the primary person involved in the
 3 action.
 4 **Q. Okay. And as part of threat assessments**
 5 **at Arapahoe High School prior to December of 2013, was**
 6 **there a specific protocol used to determine how**
 7 **frequently to follow up with a student who had been**
 8 **the subject of a threat assessment?**
 9 A. No. It was based on the individual.
 10 **Q. And is the same true with respect to**
 11 **deciding when or how frequently to follow up with the**
 12 **parent of a student who had been the subject of a**
 13 **threat assessment?**
 14 A. It's also based on the individual.
 15 **Q. Okay. And has that changed since the**
 16 **shooting?**
 17 A. I think shorter timelines have been
 18 implemented.
 19 **Q. Okay. And I appreciate that. Going on**
 20 **from that, is there now, since the shooting at**
 21 **Arapahoe, a more formal or prescribed set of**
 22 **requirements, for instance, somebody from the team has**
 23 **to call the parent two weeks out, 30 days out, 60 days**
 24 **out, following a threat assessment, anything like**
 25 **that?**

109	<p>1 A. Is prescribed in that detail? Again,</p> <p>2 it's based on the individual.</p> <p>3 Q. Okay.</p> <p>4 A. I mean, a lot of, again, individual</p> <p>5 interpretation based on a high-level threat versus a</p> <p>6 low-level threat.</p> <p>7 Q. Okay. Let me jump ahead to page 501 of</p> <p>8 Exhibit 4, and it's this page with the handwriting on</p> <p>9 it. Down at the bottom left of the training</p> <p>10 presentation it says, "Before ruling out a threat as</p> <p>11 no big deal, get more information and get a second</p> <p>12 opinion." Do you see that?</p> <p>13 A. I do.</p> <p>14 Q. Did Arapahoe in 2013 require a grade</p> <p>15 level assistant principal to get a second opinion</p> <p>16 before concluding a threat assessment as a low-level</p> <p>17 threat?</p> <p>18 MR. EVERALL: I'm going to object to the</p> <p>19 form of the question. It kind of implies or links no</p> <p>20 big deal to a low-level threat.</p> <p>21 Q. (BY MR. ROCHE) You can go ahead and</p> <p>22 answer.</p> <p>23 A. So back to the question.</p> <p>24 Q. Sure.</p> <p>25 THE DEPONENT: Could you read it back to</p>	111
110	<p>1 me, please?</p> <p>2 (The question beginning on page 109,</p> <p>3 line 14, was read back as follows: "Did Arapahoe in</p> <p>4 2013 require a grade level assistant principal to get</p> <p>5 a second opinion before concluding a threat assessment</p> <p>6 as a low-level threat?")</p> <p>7 A. No, not that I know of.</p> <p>8 Q. (BY MR. ROCHE) Does Arapahoe now require</p> <p>9 the team to get a second opinion before concluding</p> <p>10 that a threat is a low-level threat?</p> <p>11 A. Indirectly, because the information is</p> <p>12 shared with a director of student services before it's</p> <p>13 concluded.</p> <p>14 Q. Okay. And it's shared with the</p> <p>15 principal, correct?</p> <p>16 A. Correct.</p> <p>17 Q. So those would be -- to the extent there</p> <p>18 is a second opinion, those are the ones that are</p> <p>19 gotten?</p> <p>20 A. Sure. Correct.</p> <p>21 Q. And that's a change that occurred at</p> <p>22 Arapahoe after the shooting?</p> <p>23 A. Somewhat.</p> <p>24 Q. Sometime after the shooting?</p> <p>25 A. The information prior to December 2013</p>	112

113

1 break and keep plowing through?
 2 MR. EVERALL: Off the record.
 3 (Recess taken, 12:41 p.m. to 1:38 p.m.)
 4 MR. ROCHE: Let's go back on the record.
 5 **Q. (BY MR. ROCHE) Obviously you're still**
 6 **under oath. A couple of just housekeeping things that**
 7 **I neglected to do at the front end. One is the**
 8 **arbitrator who is overseeing this process is a retired**
 9 **judge by the name of Judge Meyer. Judge Meyer has**
 10 **issued an order, it's called a sequestration order,**
 11 **just so you know. I don't want to ask what you and**
 12 **Mr. Everall have talked about, but in broad strokes, a**
 13 **sequestration order is an order that says witnesses**
 14 **shouldn't talk to each other about their testimony.**
 15 **So I just wanted to make you aware that that was in**
 16 **effect.**
 17 A. Thank you.
 18 **Q. Second kind of standalone question that I**
 19 **should have asked earlier, and I didn't, I apologize.**
 20 **When we were walking through your responsibilities and**
 21 **duties, I wanted to find out what you could tell me**
 22 **about how safety and security issues are considered in**
 23 **your performance evaluations, if you know?**
 24 A. Well, I think since it's outlined as one
 25 of my main responsibilities, it would affect my

114

1 performance evaluation.
 2 **Q. Okay. And do you get a written**
 3 **performance evaluation every year? I'm not asking**
 4 **what's in them, I'm just asking if you get one.**
 5 A. I do.
 6 **Q. And, again, I'm not at this point asking**
 7 **you whether you got high marks or low marks on any**
 8 **performance evaluations that you received. In your**
 9 **performance evaluations in the past, have there been**
 10 **written discussions about -- or grades, if you will,**
 11 **on those evaluations relating to the job you were**
 12 **doing in managing safety and security at Arapahoe High**
 13 **School?**
 14 A. I'm sure it was mentioned. I don't think
 15 it's necessarily a grade, as you put it.
 16 **Q. Is it a separate category, or is it**
 17 **something that's folded into the overall performance?**
 18 A. It's basically a narrative.
 19 **Q. Okay. And what about for the school**
 20 **itself? Obviously schools get report cards, if you**
 21 **will --**
 22 A. Uh-huh.
 23 **Q. -- every year as well. And is safety and**
 24 **security a category on which Arapahoe is evaluated**
 25 **every year?**

115

1 A. Through the school report card system?
 2 **Q. Yes.**
 3 A. Not that I know of.
 4 **Q. Okay. And in broad strokes, and, again,**
 5 **I'm certainly not --**
 6 A. It's hot.
 7 **Q. Do you want to put some water in it?**
 8 A. No, I'm good.
 9 **Q. In broad strokes, what I'm trying to get**
 10 **at is sort of what are the systemic incentives and**
 11 **disincentive that exist for school administrators and**
 12 **LPS and for the school itself to make safety a**
 13 **priority? In other words, are people rewarded for**
 14 **doing a good job on safety? Are they punished for**
 15 **doing a bad job on safety? Is that something that is**
 16 **a focus of the evaluation?**
 17 A. No, it's not a focus.
 18 **Q. Okay. Got it. Thanks.**
 19 MR. ROCHE: Let's go ahead and mark this.
 20 (Deposition Exhibit 5 was marked.)
 21 **Q. (BY MR. ROCHE) Have you seen Exhibit 5**
 22 **before?**
 23 A. From July of 2013, I have not.
 24 **Q. Okay. I take it then that Exhibit 5 is**
 25 **not a tool that was provided to the administrators at**

116

1 **Arapahoe High School in the summer of 2013?**
 2 A. Not that I remember.
 3 **Q. And it's not something that you recall**
 4 **being trained on?**
 5 A. Not that I remember.
 6 **Q. Okay. That will make it a very short**
 7 **discussion.**
 8 (Deposition Exhibit 6 was marked.)
 9 A. Are we done with this one then?
 10 **Q. We are. If you don't know about it, I'm**
 11 **not going to ask you about it. Is Exhibit 6 a**
 12 **document you recognize?**
 13 A. Not really.
 14 **Q. And --**
 15 A. Well, can I -- let me look at it.
 16 **Q. No, go ahead. And let me --**
 17 A. The front page I don't recognize.
 18 **Q. And let me -- as part of asking you to**
 19 **look at this, I'm going to also ask you to take a look**
 20 **at the last two pages of it.**
 21 A. Sorry.
 22 **Q. No, take your time and look. It's**
 23 **totally okay.**
 24 A. I'm being a bad witness.
 25 **Q. No, you're doing fine.**

117

1 A. So can I correct my statement?
 2 **Q. Absolutely. That's why I wanted to point**
 3 **that out. Go ahead.**
 4 A. So I do not recognize pages 1 and 2.
 5 **Q. Okay.**
 6 A. I do recognize pages 3, 4, and 5 --
 7 **Q. Okay.**
 8 A. -- as documents provided to us, I
 9 believe, just last year.
 10 **Q. All right. And I will limit my**
 11 **questioning of you to the last three pages of**
 12 **Exhibit 6.**
 13 A. Okay.
 14 **Q. Page 2086 is titled "Littleton Public**
 15 **Schools Crisis Response Flowchart." Is this a**
 16 **document that you were trained on as an administrator**
 17 **of Arapahoe?**
 18 A. I believe it was part of the
 19 suspension/expulsion danger assessment training that
 20 we received.
 21 **Q. And this something that appears to have**
 22 **been created back in 2010, if you look in the lower**
 23 **left-hand corner?**
 24 A. Correct, I see that.
 25 **Q. So is that about when you saw this**

118

1 **document, if you know?**
 2 A. I can't remember exactly when I've seen
 3 it. I know I've seen it in the last two years.
 4 **Q. And is this is a document that you used**
 5 **in performing the threat assessments that you were**
 6 **involved in?**
 7 A. I may have made reference to it.
 8 **Q. Okay. It wasn't a document that was a**
 9 **regular part of, Okay, if I've got to do a threat**
 10 **assessment, I've got to go look at the flowchart kind**
 11 **of thing? That's a terrible question. Let me start**
 12 **over.**
 13 **Is this a document that you reviewed on a**
 14 **regular basis in the course of performing threat**
 15 **assessments?**
 16 A. If I needed.
 17 **Q. Okay. Now, look at, if you would, the**
 18 **last two pages of Exhibit 6. This is a document**
 19 **titled "Danger Assessment Training," and then it says**
 20 **it's got updates and reminders for 2014-2015. Do you**
 21 **see that?**
 22 A. I do.
 23 **Q. Do you know who prepared this document?**
 24 A. I don't know specifically.
 25 **Q. Okay. Did you have an understanding that**

119

1 **this danger assessment training update was prepared at**
 2 **least in part in response to the shooting at Arapahoe**
 3 **High School?**
 4 A. Do I know that?
 5 **Q. Is that your understanding?**
 6 A. Yes.
 7 **Q. Okay. And is this something that you**
 8 **were trained on?**
 9 A. Yes, these two pages were specifically
 10 addressed by Nate Thompson.
 11 **Q. And that was my next question. Nate**
 12 **Thompson trained you on this?**
 13 A. Correct.
 14 **Q. Were they part of a larger training**
 15 **program that Mr. Thompson did for you and whoever else**
 16 **participated in the training?**
 17 A. No. It was specifically on danger
 18 assessment.
 19 **Q. Okay. So the training was these two**
 20 **pages?**
 21 A. I believe there was several other
 22 documents or slides.
 23 **Q. Okay. And who at Arapahoe High School**
 24 **received the training on danger assessment from**
 25 **Mr. Thompson other than you? Was it all**

120

1 **administrators, all faculty?**
 2 A. Correct, all administrators.
 3 **Q. What about the teachers?**
 4 A. I don't know that.
 5 **Q. What about campus supervisors or security**
 6 **officers?**
 7 A. I believe they were all trained --
 8 **Q. They were also trained?**
 9 A. -- in the past school year.
 10 **Q. What about the school counselors or**
 11 **school psychologist? Did they receive this training**
 12 **as well, if you know?**
 13 A. I don't know.
 14 **Q. Okay.**
 15 A. I would presume that they did.
 16 **Q. And do you know, did Ms. Pramenko**
 17 **participate in the danger assessment training that's**
 18 **reflected here?**
 19 A. This past school year?
 20 **Q. Yes.**
 21 A. Yes.
 22 **Q. Did these danger assessment training**
 23 **materials that we're looking at replace some other**
 24 **danger assessment training materials that were being**
 25 **used prior to the 2014-2015 school year, or is this a**

121

1 **brand-new --**

2 A. No, I think they didn't replace. I think

3 they were in addition to.

4 **Q. Were they in addition to the threat**

5 **assessment slide show that we were just looking at**

6 **before lunch, or was there something else that I'm --**

7 A. There may have been an intermediate. I

8 don't know.

9 **Q. Okay. And in this description of the**

10 **update to the danger assessment training, this memo**

11 **describes some changes that were made to the threat**

12 **assessment forms, right?**

13 A. Correct.

14 **Q. And it then goes on to identify that**

15 **there are some new guidance documents available to the**

16 **administrators to help them perform threat**

17 **assessments, right?**

18 A. Yes, it does say that.

19 **Q. And we're going to look at those in just**

20 **a little bit. It continues on to say that there are**

21 **district level danger review meetings each week. Do**

22 **you see that?**

23 A. I do.

24 **Q. Did anybody from Arapahoe participate in**

25 **those danger -- weekly danger review meetings?**

122

1 A. I don't know.

2 **Q. I take it to the extent that anybody did,**

3 **it was not you?**

4 A. Correct.

5 **Q. Okay. The next page of Exhibit 6 is a**

6 **document titled "Early and imminent warning signs for**

7 **school violence." Do you see that?**

8 A. I do.

9 **Q. And is this one of the new documents that**

10 **was prepared after the shooting, as best as you can**

11 **recall?**

12 A. Yeah, from the best -- to what I

13 remember, yes.

14 **Q. Okay. And under the title "Early**

15 **imminent warning signs for school violence," it says**

16 **below that, "Reminders for teachers and other school**

17 **staff," at the very top.**

18 A. Oh, okay.

19 **Q. So that suggests to me that this document**

20 **was provided to teachers and other staff at the**

21 **school, whether it's the janitors, the counselors,**

22 **psychologists, whoever, right?**

23 A. Correct.

24 **Q. Is that what happened with this document,**

25 **if you know?**

123

1 A. I don't know. I don't know.

2 **Q. Okay. I take it you don't know then**

3 **whether or not the teachers and other school staff**

4 **were trained on this document, assuming they were**

5 **provided it?**

6 A. I don't know.

7 **Q. Okay. And if you -- I'm not going to ask**

8 **you to do a comparison, but if you look in broad**

9 **strokes at the early warning signs and imminent**

10 **warning signs, they appear to me to track pretty**

11 **closely to that longer PowerPoint presentation that we**

12 **were looking at earlier today?**

13 A. They do.

14 (Deposition Exhibit 7 was marked.)

15 **Q. Do you recognize Exhibit 7?**

16 A. I do.

17 **Q. And is this one of the new documents that**

18 **was prepared by LPS after the shooting?**

19 A. That's when I remember receiving it.

20 **Q. And it's one of the documents that was**

21 **referred to as a new document to help with threat**

22 **assessments that's referenced in Exhibit 6 --**

23 A. Correct.

24 **Q. -- right?**

25 A. Yep.

124

1 **Q. It says in Exhibit 6 the threat**

2 **assessment guidance document, which is what we're**

3 **looking at, and that's Exhibit 7 --**

4 A. Correct.

5 **Q. -- provides specific clarifications about**

6 **what is required versus what is optional, right?**

7 A. Correct.

8 **Q. And do you know who, if anybody at LPS,**

9 **was trained on this new threat assessment guidance**

10 **document?**

11 A. Who in the district?

12 **Q. No, I'm sorry, who at Arapahoe. I'm**

13 **sorry.**

14 A. Well, the administrators is all the

15 knowledge that I have.

16 **Q. Okay.**

17 A. They were in the room with me.

18 **Q. And where did that training happen?**

19 A. At -- it was in the main office

20 conference room.

21 **Q. At LPS?**

22 A. At Arapahoe.

23 **Q. Oh, at Arapahoe. And was this the Nate**

24 **Thompson training program again?**

25 A. Correct.

125

1 **Q. Okay. And when you say "the**
 2 **administrators," that's all the assistant principals**
 3 **and the principal?**
 4 A. Correct.
 5 **Q. Anybody else?**
 6 A. Not that I remember.
 7 **Q. Okay. Now, on Exhibit 7, it says that**
 8 **there are several key concepts for performing a threat**
 9 **assessment. Do you see that?**
 10 A. I do.
 11 **Q. The first one says, "School staff,**
 12 **students, and parents need to know basic warning signs**
 13 **and how to report concerns," right?**
 14 A. Correct.
 15 **Q. Is Arapahoe doing anything different now**
 16 **from what it was doing in 2013 and earlier to make**
 17 **sure that staff, students, and parents know the basic**
 18 **warning signs of kids in crisis or threats of**
 19 **violence?**
 20 A. So the question is, are we doing anything
 21 differently? Yes.
 22 **Q. To make -- yes. Okay. Tell me what, and**
 23 **I know that's a broad question.**
 24 A. Well, for example, information is shared
 25 on a regular basis through -- on a more regular basis.

126

1 I've already referenced the newsletter.
 2 **Q. Right.**
 3 A. We have group sessions through the
 4 counseling department on, not necessarily threats, but
 5 almost a care team where kids come -- there's a
 6 variety of help sessions now. I mean, there's some
 7 for grief group, loss of family members, kids
 8 struggling with gender identity. Some of the -- not
 9 necessarily -- we don't call it threat assessment in a
 10 student counseling session.
 11 **Q. Okay.**
 12 A. But that's some of the stuff that they
 13 address.
 14 **Q. Okay.**
 15 A. The school and the district have put
 16 together parent information nights.
 17 **Q. Okay.**
 18 A. Arapahoe hosted one this fall. I believe
 19 they are also working with Arapahoe County Sheriff's
 20 Office, because I think James and Natasha had one as
 21 well in January. Other high schools have implemented
 22 that as well. I think, as I pointed out earlier, a
 23 little more comprehensive communication with the
 24 faculty and staff.
 25 **Q. Okay.**

127

1 A. Boy -- well, a difference is training
 2 more people in danger assessment.
 3 **Q. Okay.**
 4 A. Our school campus supervisors, for
 5 example. Teachers who request it. I just think the
 6 community has become a little more aware, so they're
 7 requesting more information, and we're giving that to
 8 them as a school and as a district.
 9 **Q. Fair enough. Makes perfect sense. And**
 10 **that's to be expected after the tragedy that happened,**
 11 **safety and threat assessments are certainly more of a**
 12 **priority at Arapahoe now?**
 13 A. Correct.
 14 **Q. The next bullet point on Exhibit 7 says**
 15 **that "Gathering information into a single vortex is**
 16 **essential for accurate assessment." Do you see that?**
 17 A. I do.
 18 **Q. And what is your understanding of what**
 19 **that means?**
 20 A. Well, the single vortex refers to one
 21 encompassing set of information regarding a student or
 22 a situation.
 23 **Q. So, in other words, you want to make sure**
 24 **that there's sort of a central clearinghouse of all of**
 25 **the information relevant to that student somewhere?**

128

1 A. Correct.
 2 **Q. So that you don't have somebody over here**
 3 **who knows one thing and somebody over here who knows**
 4 **something else, it all gets collected into a central**
 5 **point so that somebody can make a comprehensive**
 6 **assessment of that student based on all of the**
 7 **available information?**
 8 A. Correct.
 9 **Q. And that's a change as well since the**
 10 **shooting, right? It wasn't happening before the**
 11 **shooting?**
 12 A. I can say it's an improvement.
 13 **Q. Okay. And then when we walk through all**
 14 **of the questions that are listed on this document,**
 15 **there's two columns. One is the required steps to be**
 16 **taken, and the other is the loose or suggested steps**
 17 **to be taken; is that right?**
 18 A. Correct. That's how it reads.
 19 **Q. And one of those questions is, "When**
 20 **should an ESC administrator be notified?" Do you see**
 21 **that?**
 22 A. I do.
 23 **Q. And that's Educational Services Center,**
 24 **is ESC?**
 25 A. Correct.

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1 **Q. And that basically means the office, the**
 2 **district office over on Crocker Street?**
 3 A. Correct.
 4 **Q. Okay. I just wanted to make sure I**
 5 **understood that in piece. And this walks through a**
 6 **number of requirements what are the expectations for**
 7 **training, when must a threat assessment be conducted,**
 8 **all of those kinds of things. One of those is, "Who**
 9 **should be interviewed during the process?" Do you see**
 10 **that?**
 11 A. I do.
 12 **Q. It's on page 2.**
 13 A. Uh-huh.
 14 **Q. And required is the student, the parents,**
 15 **staff members, any outside providers. The recommended**
 16 **or suggested people to be talked to are other**
 17 **teachers, staff, students, and any other outside**
 18 **people, youth ministers, coaches, et cetera, who may**
 19 **have information, right?**
 20 A. Correct.
 21 **Q. Is that recommendation talking to**
 22 **students, counselors, ministers, et cetera -- is that**
 23 **a new suggestion since the shooting?**
 24 A. So everything in the right column?
 25 **Q. Yes. The loose or suggested column.**

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1 A. I can't say if it is new. I think it is
 2 more specific.
 3 **Q. Okay. And at the bottom of this page,**
 4 **one of the questions posed is, "Should we search a**
 5 **student's personal items or online accounts?" Do you**
 6 **see that?**
 7 A. I do.
 8 **Q. And this makes clear that searches are**
 9 **allowed under the LPS code of conduct. Do you see**
 10 **that in the left-hand column in the top? Let me point**
 11 **it to you.**
 12 A. Sure. Yeah, it just starts here.
 13 **Q. Oh, okay.**
 14 A. Can I have the question again, please?
 15 **Q. Sure. This document makes clear that the**
 16 **school is permitted to search electronic devices among**
 17 **other things, right?**
 18 A. Correct.
 19 **Q. And to look into a student's Internet or**
 20 **virtual information if there's a reasonable suspicion?**
 21 A. Correct. Uh-huh.
 22 **Q. Okay. And how frequently is Arapahoe**
 23 **actually doing that now? In other words, looking into**
 24 **the Internet life of a kid of who may be performing a**
 25 **threat assessment, is that standard practice now?**

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1 A. I believe so.
 2 **Q. And it was not standard practice prior to**
 3 **the shooting, it was an option, but it wasn't a**
 4 **standard step that was taken by the threat assessment**
 5 **team, correct?**
 6 A. I think it was dependent on the
 7 individual and the assessment that's being done.
 8 **Q. Okay. And then jumping ahead to page**
 9 **2482 in the middle of the page it says, "Who is**
 10 **responsible for monitoring a student after they have a**
 11 **Threat Assessment?" Do you see that?**
 12 A. I do.
 13 **Q. Prior to December of 2013, who was**
 14 **responsible for monitoring a student after a threat**
 15 **assessment was performed?**
 16 A. My experience, it was a shared
 17 responsibility between the grade level assistant
 18 principal, a school psychologist/counselor, and
 19 special education teacher -- or special education case
 20 manager.
 21 **Q. If there was one?**
 22 A. If applicable, correct.
 23 **Q. And what would you expect -- let's leave**
 24 **the special ed case manager off the list for now.**
 25 A. Okay.

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1 **Q. But what would you expect the grade level**
 2 **assistant principal and school psychologist and school**
 3 **counselor to do in terms of follow-up and monitoring**
 4 **of a student after a threat assessment was made? I**
 5 **mean, what does that monitoring and follow-up look**
 6 **like?**
 7 A. For me personally?
 8 **Q. Sure.**
 9 A. I would say I have the counselor checking
 10 initially every five to ten school days, checking in
 11 with the student.
 12 **Q. Physically speaking with the student?**
 13 A. Yeah. Let's have a conversation.
 14 **Q. Come into my office, and let's do ten**
 15 **minutes of how are you?**
 16 A. How are you? Assistant principal
 17 checking with the counselor after those meetings and
 18 the information from the school counselor going to the
 19 school psychologist.
 20 **Q. Okay.**
 21 A. Probably reducing of the frequency, if
 22 everything seems to be going okay, to once a month
 23 into the semester, end of the school year, you know,
 24 you're --
 25 **Q. Sure.**

133

1 A. -- loosening the parameters if everything
 2 seems to be going fine.
 3 **Q. Correspondingly tightening the parameters**
 4 **if the problems are persisting or --**
 5 A. Increasing.
 6 **Q. -- increase, right? Would you expect, as**
 7 **part of that responsibility for monitoring and**
 8 **following up on a student's threat assessment, that**
 9 **somebody would talk to that student's teachers on sort**
 10 **of the same frequency that you just described? Not**
 11 **just to the kid, How are you doing, but to the**
 12 **teachers, How is this kid doing?**
 13 A. I think that's dependent on the situation
 14 and the student.
 15 **Q. Okay. But that certainly might be**
 16 **appropriate under some circumstance?**
 17 A. Some circumstance, yeah.
 18 **Q. Okay. And, again, the frequency of that**
 19 **kind of checking in with the student's teachers would**
 20 **drop off as the issue seemed to resolve itself, right?**
 21 A. Correct.
 22 **Q. Or increase the frequency of that if the**
 23 **problem seemed to be getting worse?**
 24 A. Depending on the situation, depending on
 25 the next event, right.

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1 **Q. Okay. And in the loose or suggested**
 2 **column of Exhibit 7 in this category it says, "SRO's**
 3 **and law enforcement can be involved in ongoing**
 4 **monitoring and sometimes even for additional**
 5 **surveillance measures." Do you see that?**
 6 A. Yes, I do see that.
 7 **Q. Has Arapahoe implemented that loose**
 8 **suggestion since it was adopted with this new**
 9 **document?**
 10 A. Yes.
 11 **Q. And what shape does that take? I mean,**
 12 **are they putting extra cameras in the schools to watch**
 13 **a kid or are they bugging his locker? I'm just trying**
 14 **to figure out what that means.**
 15 A. Oh, no. To me that means, for example,
 16 school resource officer making a home visit.
 17 **Q. Okay. That raises a great question.**
 18 **Does anybody from the school ever conduct a home visit**
 19 **as part of a threat assessment?**
 20 A. School resource officer. I can't -- I
 21 don't remember if anyone else outside of law
 22 enforcement has done that.
 23 **Q. Okay.**
 24 A. We have done that for other issues,
 25 attendance, truancy, family services.

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1 **Q. Okay. So if there is concerns about**
 2 **abuse or neglect, for instance?**
 3 A. Correct.
 4 **Q. Okay. But generally speaking, if there**
 5 **is going to be a home visit as part of a threat**
 6 **assessment, either the school resource officer or some**
 7 **other law enforcement official will conduct that home**
 8 **visit?**
 9 A. Correct.
 10 **Q. Okay. Now, the last question on this**
 11 **document, it says, "Does the student ever get**
 12 **'released' from a Threat Assessment?" Do you see**
 13 **that?**
 14 A. Bottom column, bottom --
 15 **Q. Bottom column on the left, yes.**
 16 A. Correct.
 17 **Q. And one of the new requirements is that a**
 18 **student's name stays on a district level monitoring**
 19 **list through the end of their time at LPS. Do you see**
 20 **that?**
 21 A. I do.
 22 **Q. Am I correct that's a new requirement or**
 23 **do you know?**
 24 A. I couldn't answer that. I mean, since
 25 I'm not a district level employee.

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1 **Q. Okay. Fair enough.**
 2 A. But I would assume that it's part of the
 3 danger review committee.
 4 **Q. And then the threat assessment help sheet**
 5 **that is at the back of Exhibit 7, this is also a new**
 6 **document? Oh, here, 2483 is what I'm looking at, and**
 7 **then it continues on.**
 8 A. Okay. Yeah. Okay. Sorry.
 9 **Q. So my question to start is, is this one**
 10 **of the documents that was updated or prepared in 2014?**
 11 A. I believe so.
 12 **Q. Okay. And the same with 2484 and 2485,**
 13 **those are also part of a new package of documents that**
 14 **was provided to teachers or administrators?**
 15 A. Yes, updated information.
 16 **Q. Okay. And sticking with the help sheet**
 17 **for now, page 2483, one of the suggestions that is**
 18 **played out in this document is that as part of the**
 19 **information gathering or interviews, it's recommended**
 20 **that the people performing the threat assessments**
 21 **should talk to peers. Do you see that?**
 22 A. I do.
 23 **Q. And that's a -- I guess a new or more**
 24 **explicit recommendation than existed prior to 2013,**
 25 **right?**

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1 A. I don't know. I'd have to see the threat
 2 assessment sheet from 2013.
 3 **Q. Okay.**
 4 A. You know what I'm -- because it had
 5 people to talk to.
 6 **Q. Okay.**
 7 A. Outlined --
 8 **Q. You just don't recall --**
 9 A. Correct.
 10 **Q. -- whether or not other students was on**
 11 **that list?**
 12 A. Correct.
 13 (Deposition Exhibit 8 was marked.)
 14 **Q. Do you recognize Exhibit 8? And after**
 15 **you review it, my question is, is this one of the new**
 16 **packet of materials that was generated in 2014?**
 17 A. I believe it is.
 18 (Deposition Exhibit 9 was marked.)
 19 **Q. Now, Exhibit 9 is another document that**
 20 **was produced to me by LPS, and my first question is,**
 21 **have you seen this document before?**
 22 A. I have not. Well, front page.
 23 **Q. Yes, and that's -- and what about the**
 24 **other three pages which appear to be tables of who**
 25 **attended what training and when. Is that something**

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1 **you have seen before?**
 2 A. I have not.
 3 MR. ROCHE: Go off for a second.
 4 (Recess taken, 2:20 p.m. to 2:21 p.m.)
 5 **Q. (BY MR. ROCHE) Now, in looking at**
 6 **Exhibit 9, it appears to me to identify the people who**
 7 **undertook what training from Arapahoe High School**
 8 **relating to danger and threat assessment training. Do**
 9 **you see that?**
 10 A. I do.
 11 **Q. And, for instance, this exhibit indicates**
 12 **that on February 28, 2011, you, Esther Song, Kirk**
 13 **Bast, Scott Wadsworth, and Steve Sisler participated**
 14 **in some training provided by Nate Thompson. Do you**
 15 **see that?**
 16 A. I do.
 17 **Q. Do you have any recollection of who**
 18 **decided who would participate in that training and who**
 19 **would not?**
 20 A. I don't remember.
 21 **Q. Okay. There was another training program**
 22 **in April of 2012, so a little over a year later,**
 23 **again, provided by Nate Thompson. Do you see that?**
 24 A. I do.
 25 **Q. That was attended by Kelly Talen and**

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1 **Scott Wadsworth, right?**
 2 A. Correct.
 3 **Q. That looks like it's another version of**
 4 **the danger assessment training, right?**
 5 A. Correct.
 6 **Q. And there is yet another training program**
 7 **on that same subject by Mr. Thompson, and Brian Jesse**
 8 **participated in that; is that right?**
 9 A. Correct.
 10 **Q. So in the three years prior to the**
 11 **shooting, a total of seven people at Arapahoe took the**
 12 **danger assessment training; is that right?**
 13 MR. EVERALL: Looks like eight.
 14 MR. ROCHE: One of them took it twice.
 15 A. Correct.
 16 **Q. (BY MR. ROCHE) And Natalie Pramenko was**
 17 **not among the people who in the three years prior to**
 18 **this shooting took any of this danger assessment**
 19 **training; is that right?**
 20 A. According to this document.
 21 **Q. Well, do you recall ever seeing Natalie**
 22 **at any of the danger assessment training that was**
 23 **conducted by LPS in the three years before the**
 24 **shooting?**
 25 A. I don't.

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1 **Q. What about Kevin Kolasa? He doesn't**
 2 **appear as having taken any of the danger assessment**
 3 **training in the three years prior to the shooting. Do**
 4 **you recall him attending any of those trainings before**
 5 **the shooting?**
 6 A. I don't remember that.
 7 **Q. And earlier today when we talked about**
 8 **the threat assessment danger assessment training, you**
 9 **said that it was mandatory, but that it is more**
 10 **strictly enforced now. Do you recall that discussion?**
 11 A. I do.
 12 **Q. And the reason I asked about that is**
 13 **because of this document, because whether it was**
 14 **mandatory before, it certainly looks like you're**
 15 **right, it is being enforced. People are required to**
 16 **take this threat assessment training since the**
 17 **shooting. Isn't that what this document shows you as**
 18 **well?**
 19 A. It does.
 20 **Q. So, for instance, in the -- on**
 21 **February 24 of 2014, 11 different people took danger**
 22 **assessment training, including Kevin Kolasa, Kelly**
 23 **Talen, Natalie Pramenko, you, who had already taken**
 24 **it, actually, and several other people; right?**
 25 A. Correct.

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1 **Q. So is it fair to say after the shooting,**
 2 **Arapahoe got more serious about making sure its**
 3 **administrators took this training?**
 4 MR. EVERALL: Object to form.
 5 A. It seems unfair to say serious.
 6 **Q. (BY MR. ROCHE) What word would you use?**
 7 **Because I do want to be fair. I really do.**
 8 A. Thorough.
 9 **Q. Okay. So more thorough, correct?**
 10 A. Correct.
 11 **Q. Now, this is going to be a little bit**
 12 **disorganized, so I apologize in advance for that. But**
 13 **as part of the documents that were produced to me was**
 14 **about a 500-page, what looks like, presentation with**
 15 **this yellow paper. Does that ring any bells with you?**
 16 **Do you recall seeing some very long presentation that**
 17 **had this funky shade of, what I will call yellow, but**
 18 **I think probably any female in the world will call it**
 19 **some other color. They're more discerning than I am.**
 20 A. I do not remember that. So it's 500
 21 slides?
 22 **Q. It's huge. And I didn't want to -- it**
 23 **would be a whole other box if I were to present it to**
 24 **you. So that's why I wanted to --**
 25 A. Not that I remember.

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1 **Q. Okay. I'm going to mark this one page**
 2 **just to start.**
 3 (Deposition Exhibit 10 was marked.)
 4 **Q. And you can see from this one slide that**
 5 **there was a discussion of culture and climate surveys?**
 6 A. Uh-huh.
 7 **Q. Do you know, has Arapahoe High School**
 8 **ever done or commissioned a cultural or climate survey**
 9 **since you've been there?**
 10 A. Maybe twice.
 11 **Q. When was the last one?**
 12 A. Might have been right around 2010.
 13 **Q. And who did this survey?**
 14 A. It was Mary Gottlieb, the assistant
 15 principal.
 16 **Q. And is it a questionnaire that's handed**
 17 **out to students, students and staff, just staff? I**
 18 **just -- I don't know what a culture survey looks like.**
 19 A. I'm not sure -- I don't remember how it
 20 was implemented. I remember discussing the results in
 21 an administrative meeting with Ron Booth --
 22 **Q. Okay.**
 23 A. -- on two different occasions. It was
 24 definitely two or three years apart.
 25 **Q. Okay.**

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1 A. Somewhere in there.
 2 **Q. And was there a written result prepared**
 3 **or a summary of the survey done?**
 4 A. I believe so.
 5 **Q. Okay.**
 6 A. This is not it, though.
 7 **Q. This is not it, and I understand that.**
 8 **I'm not going to ask you from memory what that survey**
 9 **says.**
 10 MR. ROCHE: I may ask you to get me a
 11 copy, but we'll deal with that after the fact.
 12 MR. EVERALL: Okay.
 13 **Q. (BY MR. ROCHE) What is a PBIS survey, if**
 14 **you know? I just see it there.**
 15 A. Positive behavior intervention
 16 strategies, I believe.
 17 **Q. Wow, I would never have guessed that.**
 18 **Okay. Has Arapahoe ever done a PBIS survey?**
 19 A. No.
 20 **Q. What about a youth risk behavior survey?**
 21 A. No, not that I know of.
 22 **Q. Okay. I guess you don't know whether or**
 23 **not this -- these yellow slides came from something**
 24 **that Nate Thompson prepared?**
 25 A. I don't know.

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1 (Deposition Exhibit 11 was marked.)
 2 **Q. Do you recognize Exhibit 11 as the**
 3 **written discovery responses that LPS prepared as part**
 4 **of this arbitration?**
 5 A. I do.
 6 **Q. Okay. And from the answers, I understand**
 7 **that you provided some of the information that is**
 8 **contained in these responses, right?**
 9 A. Correct.
 10 **Q. Okay. And, again, I want to be clear**
 11 **that -- I'm switching gears now. Obviously a lot of**
 12 **what we've been talking about prior to just now has**
 13 **been policies and procedures and things like that. I**
 14 **now want to focus more on what happened at Arapahoe**
 15 **High School in the weeks leading to Claire's death.**
 16 **So that's a lot of what is set forth in these**
 17 **discovery responses. So let's talk about that. The**
 18 **first reference I see to you in the discovery**
 19 **responses is on page 4, and it's in the middle of the**
 20 **first long paragraph talking about the doors. Do you**
 21 **see that?**
 22 A. I do.
 23 **Q. And essentially it said because you were**
 24 **the guy who did -- you were the assistant principal**
 25 **who did safety and security, you gave the instructions**

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1 to Cameron Rust, Christina Kolk, and Rod Mauler to
 2 make sure that the east north door was manually locked
 3 around 8 o'clock in the morning, right?
 4 A. Correct.
 5 Q. And that was not a main entrance to the
 6 school like the bubble entrance or even the west
 7 entrance by the student parking lot, right?
 8 A. Correct.
 9 Q. Fair to characterize that as a secondary
 10 entrance?
 11 A. Correct.
 12 Q. And in here, in the discovery responses
 13 it says, "Students and staff were asked not to prop
 14 open doors, but this sometimes happened anyway,"
 15 right?
 16 A. It does say that, correct.
 17 Q. Kids are kids. My question is, how
 18 prevalent was that problem at the school in the fall
 19 of 2013? Did it happen every day, every week, once a
 20 month, once in a blue moon? I'm just trying to get a
 21 sense.
 22 MR. EVERALL: Are you asking from his own
 23 knowledge?
 24 MR. ROCHE: Yes, I am.
 25 Q. (BY MR. ROCHE) And the reason I'm asking

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1 it is, it says in the discovery responses, "The Campus
 2 Supervisors and custodians were supposed to remove the
 3 props and report them to Mr. Meredith."
 4 A. I would say once a week.
 5 Q. Okay. And in looking at the discovery
 6 responses, it sounds like that north door had a lock
 7 on it, but it required some manual manipulation to
 8 secure the lock, right? Like there was a church key
 9 or something?
 10 A. Yeah, the Allen -- it was an Allen
 11 wrench --
 12 Q. An Allen wrench. Okay.
 13 A. -- that locked the bar down.
 14 Q. Right. Because it was a bar door, right?
 15 Okay. And unfortunately on December 13, somebody
 16 neglected -- I shouldn't -- strike that.
 17 That didn't happen on December 13.
 18 Nobody took the Allen wrench and locked down that bar,
 19 right?
 20 A. Unfortunately.
 21 Q. Okay. Do you know how often that
 22 happened that somebody just forgot to Allen wrench the
 23 door down?
 24 A. I don't know.
 25 Q. Let's talk about the next interrogatory

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1 response. In one of the interrogatories, I asked in
 2 broad strokes, tell me everybody at the school who had
 3 expressed a concern about Karl Pierson's behavior,
 4 mental well-being, emotional state, et cetera, prior
 5 to the shooting, right?
 6 A. Correct.
 7 Q. And there is a list of several incidents
 8 that was provided to me in response to that, and I
 9 want to know, and I'll go through them quickly, which
 10 ones you knew about before the shooting. Did you know
 11 about this Jackie Price issue in November of 2011?
 12 A. I did not.
 13 Q. And that's the, Go cut yourself incident,
 14 right?
 15 A. I don't know. I did not look it up.
 16 Q. Okay. There was another incident with
 17 Karl Pierson in Dan Swomley's class in the spring of
 18 2013, right?
 19 A. Correct.
 20 Q. Did you know about that incident at the
 21 time that it occurred in March of 2013?
 22 A. I believe the afternoon after it happened
 23 is when I knew about it.
 24 Q. And how did you come to learn about that
 25 incident?

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1 A. Kevin Kolasa and I spoke about it.
 2 Q. And there is a reference to your
 3 conversation with Kevin Kolasa down at the bottom of
 4 page 5 of the discovery responses. Do you see that?
 5 A. I do.
 6 Q. What did you and Mr. Kolasa discuss about
 7 that incident?
 8 A. Just he asked me what I thought, and I
 9 thought, as it is stated here, that it's odd, it was
 10 an odd comment.
 11 Q. And that is a reference to his -- there
 12 was a suspension form, and I've got a copy of it if
 13 you want to see it --
 14 A. No, that's fine.
 15 Q. -- where he signed it, The Ides of March?
 16 A. Oh, I didn't know that's how he signed
 17 it.
 18 Q. That's where that Ides of March comment
 19 comes from. Did you and Kolasa, Mr. Kolasa, excuse
 20 me, discuss whether or not Karl's behavior in
 21 Mr. Swomley's class warranted a suspension, or had
 22 that already been decided by the time you talked to
 23 him?
 24 A. I think that had already occurred, so,
 25 no, we didn't.

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1 **Q. Okay. Did you know who Karl Pierson was**
 2 **prior to this March 2013 incident?**
 3 A. I knew him from his freshman year when I
 4 had talked to Mr. Booth about his performance as an
 5 open enrolled student.
 6 **Q. Tell me about that. What did you and Ron**
 7 **Booth discuss about Karl Pierson's performance as an**
 8 **open enrolled student?**
 9 A. Well, we go through open enrolled
 10 students in the spring, March and April, and look at
 11 their performance, because to my understanding, and my
 12 operating premise, I guess, for Arapahoe High School
 13 is that it's a privilege to be there. And if you're
 14 not living up to that expectation as a guest, then
 15 your invitation is revoked.
 16 **Q. Okay.**
 17 A. And I believe at the time Karl's grades
 18 weren't very good, I mean, to what it could have been.
 19 So I put together a list, and I don't know if that has
 20 continued for the 9th and 10th graders that you submit
 21 to the principal and say, These are my question marks,
 22 maybe these are the kids that shouldn't come back.
 23 **Q. Okay. I candidly wasn't aware that the**
 24 **school did that, but it makes sense. So Karl was on**
 25 **the list of question marks about whether or not he**

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1 **should be allowed to return as a sophomore because he**
 2 **was open enrolled and --**
 3 A. As a freshman.
 4 **Q. As a freshman.**
 5 MR. EVERALL: Object to the form.
 6 **Q. (BY MR. ROCHE) And the reason you put**
 7 **that list together was because you were the person --**
 8 **the grade level assistant for the 9th grade students?**
 9 A. Correct.
 10 **Q. Was Karl's inclusion on that list purely**
 11 **a function of his grades or were there any behavioral**
 12 **issues?**
 13 A. No behavior that I was aware of.
 14 **Q. Okay. And in the discovery responses,**
 15 **there's a reference to you and Mr. Kolasa thought it**
 16 **was odd that Karl referenced The Ides of March in his**
 17 **written statement. It goes on to say Kolasa**
 18 **attributed it to his attitude of superiority. Do you**
 19 **see that?**
 20 A. I do.
 21 **Q. Is that something Mr. Kolasa told you?**
 22 A. Not that I remember.
 23 **Q. Did you have any opinions about whether**
 24 **or not Karl had an attitude of superiority back in**
 25 **March of 2013?**

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1 A. No, I didn't have -- no basis, yeah.
 2 **Q. Okay. And had you ever talked to Karl**
 3 **Pierson, I guess, ever?**
 4 A. His freshman year I'm sure we talked
 5 about grades. Anybody -- so when -- and I'll do it
 6 again this year, because I'm recycling back to 9th
 7 grade, help them establish success in 9th grade. And
 8 to do that, you have to get them, get them in early
 9 and often. So with Karl having, I think it was maybe
 10 a couple D's at the time, I would have talked to him.
 11 **Q. Okay. But you don't remember any**
 12 **conversations with him --**
 13 A. No.
 14 **Q. -- on that level?**
 15 A. Pretty standard operating procedure for
 16 me when a freshman has more than one D, even one D,
 17 they're going to come in and we're going to have a
 18 chat.
 19 **Q. Okay. Other than in 9th grade to talk to**
 20 **him about his grades, do you recall ever having a**
 21 **conversation with Karl Pierson?**
 22 A. Not a one.
 23 **Q. I assume also no conversations with his**
 24 **parents, right?**
 25 A. Correct.

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1 **Q. Because he wasn't your class?**
 2 A. Just that freshman year.
 3 **Q. Right. With respect to the March 2013**
 4 **incident in Dan Swomley's class, the discovery**
 5 **responses referred to Mr. Kolasa suggesting that Karl**
 6 **should undergo some anger management therapy. Do you**
 7 **see that?**
 8 A. I do see that.
 9 **Q. And my question to you is, did you and**
 10 **Mr. Kolasa discuss whether or not Karl Pierson ought**
 11 **to have some anger management therapy?**
 12 A. Not that I remember.
 13 **Q. Is that a common recommendation from one**
 14 **of the assistant principals at Arapahoe?**
 15 A. I can't really -- have I made that
 16 comment? I have to parents.
 17 **Q. Okay. How often?**
 18 A. Not very often.
 19 **Q. Okay. And that's what I'm getting at.**
 20 **That suggests to me -- and I guess I want to know if**
 21 **you agree. That suggests to me that this is a,**
 22 **relatively speaking, more serious anger issue than the**
 23 **garden variety issues that you guys see every day;**
 24 **isn't that right?**
 25 A. I can't really comment because when

153	<p>1 you're dealing with a student, it's the interaction</p> <p>2 when he's sitting across the table from you.</p> <p>3 Q. Okay. You've got to read the body</p> <p>4 language and all of that stuff?</p> <p>5 A. Right. And without me being in the room,</p> <p>6 I can't fairly comment on that.</p> <p>7 Q. Okay. Fair enough. And then, as I</p> <p>8 understand it, the start of the 2013-2014 school year,</p> <p>9 there was a number of incidents that kind of all</p> <p>10 happened in a flurry with respect to Karl Pierson. So</p> <p>11 I want to just ask you about those --</p> <p>12 A. Okay.</p> <p>13 Q. -- and whether you know about them,</p> <p>14 whether you heard about them, whether you discussed</p> <p>15 with them with anybody.</p> <p>16 A. Okay.</p> <p>17 Q. One was, and I'm looking at page 6 of the</p> <p>18 discovery responses during the first week or two of</p> <p>19 the school year in August, Karl called a freshman</p> <p>20 girl's remark in Jeff Corson's international relation</p> <p>21 class stupid. Did you ever hear about that prior to</p> <p>22 the shooting?</p> <p>23 A. Not that I remember.</p> <p>24 Q. Okay. On September 3 Karl wrote a</p> <p>25 strange comment on a math test and handed it in to</p>	155	<p>1 A. I believe it was the next day.</p> <p>2 Q. And who told you about it?</p> <p>3 A. I think Mark Loptien talked to me after</p> <p>4 the faculty meeting.</p> <p>5 Q. What did he tell you?</p> <p>6 A. That he heard a student screaming, and I</p> <p>7 don't remember if he said, I'm going to kill that guy</p> <p>8 or I'm going to kill Murphy. I don't remember that,</p> <p>9 but I know Mark came in and talked to me about it.</p> <p>10 Q. Had he talked to anybody else before</p> <p>11 coming to talk to you? Do you know?</p> <p>12 A. I don't know. I think he probably had</p> <p>13 because it was well after the faculty meeting.</p> <p>14 Q. Okay. And when Mark Loptien came and</p> <p>15 told you about what Karl Pierson had said, were you</p> <p>16 surprised that Karl would do something like that?</p> <p>17 A. I didn't really have a point of reference</p> <p>18 because I didn't know Karl.</p> <p>19 Q. Okay. And when Mark told you what Karl</p> <p>20 Pierson had said, what did you do?</p> <p>21 A. Well, to the best of my memory, I</p> <p>22 probably asked Mark, Did you talk to Kevin?</p> <p>23 Q. Okay.</p> <p>24 A. And I'm sure Mark told me that he had,</p> <p>25 and I probably asked him where he heard it, just basic</p>
154	<p>1 Michelle Crookham. Is that something you heard about</p> <p>2 or were aware of prior to the shooting?</p> <p>3 A. I was aware of it.</p> <p>4 Q. You were?</p> <p>5 A. (Deponent nodded head up and down.)</p> <p>6 Q. How did you become aware of that?</p> <p>7 A. I believe we talked about it after the</p> <p>8 threat assessment as an administrative team.</p> <p>9 Q. Okay. So the admin team talked about</p> <p>10 that comment. And tell me about that discussion.</p> <p>11 A. I think it was just brought up as an</p> <p>12 incident that was probably -- well, it was -- I'm sure</p> <p>13 it was part of the discussion in the threat</p> <p>14 assessment.</p> <p>15 Q. Okay. Did you have any discussions with</p> <p>16 Ms. Crookham about that incident prior to the</p> <p>17 shooting?</p> <p>18 A. I don't think I did.</p> <p>19 Q. Okay. I'm sorry if I asked this already,</p> <p>20 did you have any discussions -- strike that.</p> <p>21 Let's talk about the afternoon of</p> <p>22 September 3. When did you learn that Karl Pierson had</p> <p>23 learned -- had threatened to kill Tracy Murphy?</p> <p>24 A. When did I learn about it?</p> <p>25 Q. Yes.</p>	156	<p>1 information that's kind of outlined already here.</p> <p>2 But, you know, working with high school students and</p> <p>3 in a high school for so many years, it's kind of what</p> <p>4 I would do. I always tell them the newspaper</p> <p>5 questions: who, what, when, where, why, how.</p> <p>6 Q. Sure.</p> <p>7 A. I may have gone over that with Mark. I</p> <p>8 may have kept it pretty general.</p> <p>9 Q. Okay.</p> <p>10 A. But I remember that he said that he had</p> <p>11 talked to Kevin.</p> <p>12 Q. All right.</p> <p>13 A. So end of the day, Mark may have been,</p> <p>14 you know, ready to get out of there. I don't know. I</p> <p>15 think it was a fairly brief conversation.</p> <p>16 Q. Okay. Did you ever have any discussions</p> <p>17 with Ms. Pramenko on or about the 3rd or 4th of</p> <p>18 September --</p> <p>19 A. Not that I know of.</p> <p>20 Q. -- relating to that threat?</p> <p>21 A. No, I don't think so.</p> <p>22 Q. Had you had any discussions with</p> <p>23 Ms. Pramenko about Karl Pierson at any time during</p> <p>24 that academic year prior to the shooting?</p> <p>25 A. No.</p>

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1 **Q. And --**
 2 A. Let me --
 3 **Q. Go ahead.**
 4 A. Let me, I guess, correct that.
 5 **Q. Okay.**
 6 A. When we talked about it as an
 7 administrative team, which would have been the third
 8 week of September, somewhere in there.
 9 **Q. Okay.**
 10 A. Because he came up on the behavior report
 11 as a threat assessment.
 12 **Q. Right.**
 13 A. We talked then.
 14 **Q. As a team?**
 15 A. As a team.
 16 **Q. Okay.**
 17 A. So I don't want to say we never talked
 18 about Karl.
 19 **Q. Sure.**
 20 A. That Natalie and I never talked, but we
 21 did at that meeting.
 22 **Q. Okay. No, I appreciate that**
 23 **clarification. And with respect to that threat, after**
 24 **Mr. Loptien came and spoke to you about it, you**
 25 **directed him to Kevin Kolasa, right?**

158

1 A. Uh-huh.
 2 **Q. Did you have any further involvement in**
 3 **any of the disciplinary or assessment efforts that**
 4 **were made to address that threat?**
 5 A. I did not.
 6 **Q. Okay. You don't have any -- I take it**
 7 **you didn't have a hand in deciding whether or not to**
 8 **suspend or expel Karl for making that threat?**
 9 A. I did not.
 10 **Q. At some point I take it you learned that**
 11 **Karl was not suspended as a result of having made that**
 12 **threat, correct?**
 13 A. Yes.
 14 **Q. Do you know how you learned that Karl was**
 15 **not suspended or expelled for making that threat?**
 16 A. How did I learn?
 17 **Q. Yes.**
 18 A. I don't remember. It may have been at
 19 the administrative meeting.
 20 **Q. Let's talk about those records then.**
 21 **(Deposition Exhibit 12 was marked.)**
 22 **Q. So are these the -- obviously I don't**
 23 **expect you to read them all. Do these appear to be**
 24 **examples of the administrative team meetings that were**
 25 **held at Arapahoe High School in the fall of 2013?**

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1 A. Correct.
 2 **Q. And it looks to me like they happen**
 3 **basically every week or two?**
 4 A. Try to do it every Monday.
 5 **Q. Okay. Before school?**
 6 A. No, at 7:30.
 7 **Q. Oh, so right when school starts,**
 8 **essentially. And there's some standing agenda items**
 9 **like activities, safety and security, personnel, and**
 10 **other things like that, right?**
 11 A. That is correct.
 12 **Q. And if you move your way through those,**
 13 **there's -- it's going to be a little bit convoluted,**
 14 **but if you look at the administrative team meeting for**
 15 **September 9, 2013, do you have that one in front of**
 16 **you?**
 17 A. I do have it.
 18 **Q. There is a reference to safety and**
 19 **security, but it has nothing to do with Karl Pierson**
 20 **or the threat that he made; is that right?**
 21 A. Security 33 would indicate we're talking
 22 about our key code.
 23 **Q. Okay. So nothing to do with him, right?**
 24 A. Correct.
 25 **Q. And then there is a reference to**

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1 **discipline, which is also a standing agenda item for**
 2 **these team meetings, right?**
 3 A. Correct.
 4 **Q. No mention of Karl Pierson, right?**
 5 A. Correct, according to this agenda.
 6 **Q. The next team meeting is on September 16.**
 7 **Do you see that?**
 8 A. I do.
 9 **Q. And there is a reference to KP, no**
 10 **empathy or remorse. Do you see that?**
 11 A. I do.
 12 **Q. Is that a reference to Karl Pierson as**
 13 **best as you can tell?**
 14 A. Best recollection, correct.
 15 **Q. Okay. What can you tell me about the**
 16 **discussions that the administrative team had about**
 17 **Karl Pierson and the fact that he had no empathy or**
 18 **remorse at this September 16 meeting?**
 19 A. I don't remember an exact conversation.
 20 **Q. Well, in broad strokes.**
 21 A. Right. We most likely went over the
 22 threat assessment, which would be the week before.
 23 Kevin, and quite possibly Esther, talked about the
 24 threat assessment, and that's most likely when we
 25 talked about The Ides of March, the March 13 incident.

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1 **Q. Okay.**
 2 A. And the Michelle Crookham incident in
 3 addition to the threat that Mark heard.
 4 **Q. Okay. Who attends these administrative**
 5 **team meetings?**
 6 A. For the majority of the time?
 7 **Q. Yeah.**
 8 A. It's just the principal and all of the
 9 assistant principals.
 10 **Q. Okay. And the reason I asked that is you**
 11 **talked about whether Esther Song was there to discuss**
 12 **the threat assessment with Kevin?**
 13 A. Sure.
 14 **Q. Is it -- do you recall, did she come to**
 15 **an administrative team meeting to discuss Karl**
 16 **Pierson's threat assessment?**
 17 A. I don't remember specifically if she did.
 18 **Q. Was that typically what would happen if a**
 19 **threat assessment was done?**
 20 A. If Natalie wanted additional information,
 21 she would have Esther come over. And then every three
 22 weeks counselors would come in for approximately an
 23 hour.
 24 **Q. Okay. And you don't recall whether or**
 25 **not Natalie Pramenko brought in Esther Song to discuss**

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1 **Karl Pierson's threat assessment in the fall of 2013?**
 2 A. I don't.
 3 **Q. Do you recall whether there was any**
 4 **discussion about whether or not Karl's lack of empathy**
 5 **or remorse was a sign of a deeper problem than just**
 6 **losing his cool?**
 7 A. I don't recall that we talked about that.
 8 **Q. Okay. Do you recall any of the details**
 9 **of this September team meeting where there was a**
 10 **discussion of the fact that Karl Pierson displayed no**
 11 **empathy or remorse?**
 12 A. I don't remember any details, no, about
 13 -- regarding Karl.
 14 **Q. Okay. And then the following week there**
 15 **was another one of these weekly administrative team**
 16 **meetings, right, on the 23rd?**
 17 A. Correct.
 18 **Q. Same categories, safety and security,**
 19 **discipline, no reference to Karl Pierson, right?**
 20 A. Correct.
 21 **Q. The following week, September 30, we have**
 22 **another meeting, on the 30th. Do you see that?**
 23 A. I do.
 24 **Q. And it says KP again. Was Karl Pierson**
 25 **back on the disciplinary agenda at the end of**

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1 **September as part of this administrative team meeting?**
 2 A. I don't remember.
 3 **Q. Okay. And --**
 4 A. It --
 5 **Q. Go ahead.**
 6 A. -- quite possibly could be another KP.
 7 **Q. And that's -- I just -- I don't know**
 8 **so --**
 9 A. And I don't either.
 10 **Q. But you don't recall if it was Karl**
 11 **Pierson, why he was back on the agenda two weeks**
 12 **later?**
 13 A. I don't remember if he was or why he
 14 would be.
 15 **Q. And it may be -- and I don't expect you**
 16 **to know all of these dates. There was a reentry**
 17 **meeting conducted on September 26 when Karl was**
 18 **allowed back at school.**
 19 MR. EVERALL: Object to form.
 20 **Q. (BY MR. ROCHE) So I'm wondering if that**
 21 **jogs your memory as to why he was back on the agenda?**
 22 MR. EVERALL: Object to form. Do you
 23 want to know what's wrong with the question?
 24 MR. ROCHE: The fact that there wasn't a
 25 reentry meeting?

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1 MR. EVERALL: Not then.
 2 MR. ROCHE: Pardon me?
 3 MR. EVERALL: Not then. The second
 4 meeting in September was not a reentry meeting.
 5 **Q. (BY MR. ROCHE) Okay. Well, what do you**
 6 **know about the second meeting that was held by Kevin**
 7 **Kolasa and the other members of the administrative**
 8 **team at Arapahoe High School relating to Karl Pierson**
 9 **and the threat that he made against Tracy Murphy?**
 10 A. All I know is what I've read. Prior to
 11 this information being released to me, I had no
 12 knowledge of that action plan review meeting.
 13 **Q. Okay. And that's what that meeting is**
 14 **called, an action plan review meeting?**
 15 A. According to your document.
 16 **Q. Well, that's actually your document, but**
 17 **that's okay. This is the discovery responses that**
 18 **you're looking at --**
 19 A. Correct.
 20 **Q. -- I assume? Okay. Now, one of the**
 21 **things that has come up during the investigations that**
 22 **have occurred in connection with the shooting was a**
 23 **request by Tracy Murphy to you to pull the security**
 24 **video of September 3. Do you recall that?**
 25 A. No. The request went through Jill DeVoe.

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1 **Q. Okay. Through Jill. Do you recall ever**
 2 **talking to Tracy Murphy about the threat that Karl**
 3 **made prior to the shooting?**
 4 A. Briefly.
 5 **Q. Okay. Tell me about your conversation**
 6 **with Tracy Murphy or conversations with Tracy Murphy**
 7 **about this threat.**
 8 A. Well, Tracy wanted to know my opinion,
 9 and, again, like I voiced just a little bit ago, I
 10 told Tracy, Without me being in the room, I can't
 11 really give you an opinion on his demeanor. And he
 12 asked me, you know, about suspension, and I said, We
 13 can, as we've already talked about. He can be
 14 suspended for that. That was right around the 4th or
 15 5th.
 16 **Q. Of September?**
 17 A. Correct.
 18 **Q. Okay.**
 19 A. Conversations after that were --
 20 **Q. Well, let's --**
 21 A. -- kind of not specific to Karl, but more
 22 about library, speech and debate, you know -- but
 23 nothing specific to Karl.
 24 **Q. So how was Tracy Murphy's demeanor when**
 25 **you spoke to him? Was he visibly shaken? Was he**

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1 **visibly scared given what had happened?**
 2 A. Either the 4th or the 5th --
 3 **Q. Yes.**
 4 A. -- that conversation? He was upset. I
 5 mean, was he shaking? No, not that I remember. Was
 6 he -- he was upset, I guess, is the best way to put
 7 it.
 8 **Q. Okay. If you'll look at page 9 of the**
 9 **discovery responses, and there is information that**
 10 **Cameron Rust and Christina Kolk reported to you that**
 11 **they had seen Karl Pierson looking at guns on his**
 12 **personal computer in the cafeteria earlier that day.**
 13 **Do you see that?**
 14 A. Yes, I do.
 15 **Q. First, I want to clear up some confusion.**
 16 **That happened in October, right?**
 17 A. As far as I remember.
 18 **Q. Because I've also seen some references to**
 19 **somebody seeing Karl looking at guns in the day or two**
 20 **immediately before the shooting. Do you know -- is**
 21 **that also something that happened or do you know?**
 22 A. I don't know.
 23 **Q. Okay. So let's talk about the incident**
 24 **in early October. When Rust and Kolk reported to you**
 25 **that they had seen Karl looking at guns on his**

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1 **computer, what exactly did they tell you?**
 2 A. It was fairly vague, and to the best of
 3 my memory, they thought they saw it while they were
 4 using a surveillance camera that's in the cafeteria.
 5 **Q. Okay.**
 6 A. The cafeteria is -- gosh.
 7 **Q. It's big.**
 8 A. You've been there.
 9 **Q. Yes.**
 10 A. And it's got one central located --
 11 centrally located camera right in the middle.
 12 **Q. Okay.**
 13 A. Campus supervisors and the administrators
 14 have the ability to manipulate the camera, all of the
 15 cameras -- well, not all of them, but any of the
 16 cameras that can move, we can manipulate. So the
 17 camera in the cafeteria at the time is not a very good
 18 camera. They said they were using it to look at what
 19 kids were doing in the cafeteria. They said they
 20 thought that Karl was looking at guns. They couldn't
 21 tell me what kind, what they were.
 22 **Q. I take it you asked them what kind of**
 23 **guns they were and questions like that?**
 24 A. We had the conversation because --
 25 **Q. And that's -- and obviously I'm trying to**

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1 **get as much detail as I can about that conversation.**
 2 A. Sure. Right. The conversation was like
 3 I started --
 4 **Q. Go ahead.**
 5 A. -- my point with, that it was vague,
 6 vague information. So campus supervisors came to me
 7 with vague information, and it wasn't enough to
 8 satisfy what we've already established as reasonable
 9 suspicion.
 10 **Q. So I take it you concluded you didn't**
 11 **have enough information to search Karl's belongings or**
 12 **his computer?**
 13 A. Correct. Or to even pursue it to
 14 interview -- and this information that is provided
 15 here, I didn't have at the time about the four --
 16 where it says they had seen Karl looking at guns on
 17 his personal computer in the Arapahoe High School
 18 cafeteria with four other students, I don't remember
 19 that they told me that there was anyone else at the
 20 table.
 21 **Q. So you don't recall that there may have**
 22 **been four other students?**
 23 A. Correct.
 24 **Q. Okay. And because of the vagueness of**
 25 **the information that Rust and Kolk provided to you**

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1 **that day, that was why you didn't go talk to Karl?**
 2 A. Pursue it, correct.
 3 **Q. And that's why --**
 4 A. Or -- sorry, go ahead.
 5 **Q. Or what? Go ahead.**
 6 A. Or pass it on to Kevin or to Natalie or
 7 to James or -- at that time.
 8 **Q. Okay.**
 9 A. I know there's some information that you
 10 may address that Rod and James -- I don't believe they
 11 had that information. I don't know if I shared that
 12 with them, because I am fairly certain that this
 13 information came up at a campus supervisor meeting.
 14 That was a Monday afternoon fairly standing meeting,
 15 but Rod and James may have been working on something
 16 else and they weren't there.
 17 **Q. Okay. So I guess that raises a different**
 18 **series of questions. If this information was so vague**
 19 **that it wasn't pursued when you first heard about it,**
 20 **how did it come up at the subsequent Monday campus**
 21 **security meeting?**
 22 A. No, I think that's when it did come up
 23 was at the Monday meeting.
 24 **Q. Okay. I appreciate that clarification.**
 25 **So when it came up, it wasn't at the time that it**

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1 **happened, it was at a subsequent meeting?**
 2 A. Quite possibly the same day. I don't
 3 know.
 4 **Q. Okay. But so the record is clear, and I**
 5 **really do want to get this right, when Rust and Kolk**
 6 **saw or thought they saw Karl Pierson looking at guns**
 7 **on his computer, they didn't run over and tell you,**
 8 **Hey, Karl is looking at guns and it's right now, you**
 9 **should go do something. It was sometime after the**
 10 **event?**
 11 A. Correct. That's what I remember.
 12 **Q. Okay. And that's what I wanted to get**
 13 **clear, so I appreciate that. Now, the discovery**
 14 **responses tell me that you recall responding to**
 15 **Mr. Rust and Ms. Kolk that students could look at the**
 16 **guns on Karl's computer, campus supervisors should**
 17 **continue to observe Karl and to note his behavior. Do**
 18 **you see that?**
 19 A. I do.
 20 **Q. In light of what we looked at in the**
 21 **student code of conduct and handbook about the**
 22 **appropriate use of Internet and the inappropriate use**
 23 **of Internet, do you think that response was a mistake?**
 24 A. With the benefit of hindsight?
 25 **Q. Sure.**

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1 A. Oh, with the benefit of hindsight,
 2 possibly.
 3 **Q. Okay.**
 4 A. I guess, let me give you more information
 5 on my thinking.
 6 **Q. Sure.**
 7 A. Reasonable suspicion, student rights, the
 8 vagueness of the information, I mean, all of that kind
 9 of figured into my decision at the time.
 10 **Q. Okay.**
 11 A. For me to say, See what he's doing, if we
 12 have another incident, bring me some more information,
 13 that kind of deal, then I can maybe make a better
 14 informed decision with more specifics, not so vague,
 15 not through a dirty camera lens.
 16 **Q. Okay.**
 17 A. That kind of deal.
 18 **Q. And I appreciate that, and, believe me, I**
 19 **understand hindsight is 20/20.**
 20 A. Sure. Yeah. So --
 21 **Q. Let me --**
 22 A. Go ahead.
 23 **Q. No, go ahead.**
 24 A. Knowing now unfortunately what we know,
 25 correct.

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1 **Q. Sure.**
 2 A. Yeah.
 3 **Q. And if -- let's go back to what the**
 4 **people did know at the time.**
 5 A. Okay.
 6 **Q. In October of 2013, the administration**
 7 **knew that Karl had made a threat against Tracy Murphy,**
 8 **that it was a violent threat, and that a threat**
 9 **assessment had been performed. When you got this news**
 10 **from Cameron Rust and Christina Kolk that they thought**
 11 **Karl was looking at guns on his computer, did you tell**
 12 **either Kevin Kolasa or Esther Song about it so that**
 13 **they could decide whether to follow up on it?**
 14 A. I don't think I did.
 15 **Q. Okay. And was that a conscious choice or**
 16 **a just in the busyness of everything it didn't happen**
 17 **or --**
 18 A. I don't remember.
 19 **Q. Okay. Now, I candidly -- I'm not sure**
 20 **how to ask the question, so I don't mean to offend or**
 21 **embarrass you, but I have to ask. I've heard reports**
 22 **and seen Cameron Rust's Facebook letter and things**
 23 **like that talking about somebody at the Arapahoe**
 24 **administration saying something to the effect of,**
 25 **We're going to read about this kid, Karl, in the**

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1 papers. It just won't be here. Okay. And I have
 2 heard that that was a comment or some comment like
 3 that that you had made. So I'm just going to ask, did
 4 that happen? And if so, I really want to understand
 5 the context.
 6 A. And for the life of me, I can't remember
 7 that I made that comment. I really can't.
 8 **Q. Okay.**
 9 A. Because obviously we've talked about it.
 10 **Q. Well, and I don't want to get into what**
 11 **you and Mr. Everall talked about.**
 12 A. I know. And I'm kind of strained from
 13 being a good witness.
 14 THE DEPONENT: Because I think you guys
 15 deserve the truth.
 16 **Q. (BY MR. ROCHE) And I know it's a hard**
 17 **question and there is a reason that I brought it up**
 18 **the way I did, so if you want to take a minute --**
 19 A. No, I need to answer.
 20 **Q. -- that's okay. Take your time.**
 21 A. Thank you. I don't remember making that
 22 comment.
 23 **Q. Do you recall anybody making a comment**
 24 **like that about Karl?**
 25 A. I don't. I've read it as well.

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1 **Q. Okay.**
 2 A. It's in our documents as well. I don't
 3 know who said it.
 4 **Q. Okay.**
 5 A. And as I pointed out, referring back to
 6 point 11 --
 7 **Q. Yes.**
 8 A. -- with hindsight --
 9 **Q. No, and believe me, we know. And what I**
 10 **said at the beginning of this deposition, we are not**
 11 **here trying to blame people, I meant it. Okay?**
 12 A. I know.
 13 **Q. That's really not the objective here, and**
 14 **this is intense and it's difficult for everybody and**
 15 **we know that includes you.**
 16 A. But we all carry some guilt.
 17 **Q. We all do. We all do. You do and --**
 18 A. And I'm not saying that I carry more than
 19 anybody else, but with this point in particular, with
 20 the hindsight that unfortunately we have now.
 21 **Q. I know. And that's why --**
 22 A. It was an oversight.
 23 **Q. And that's -- like I said, that's really**
 24 **why we're here so that we can learn from what happened**
 25 **so that it doesn't happen down the road. So I just --**

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1 **there is a reason I started the deposition the way I**
 2 **did. Okay?**
 3 A. And --
 4 **Q. And I want you to know that that is**
 5 **genuinely felt.**
 6 A. That's -- hopefully everything out of
 7 this is to make sure we do everything in our power to
 8 prevent this from happening again.
 9 **Q. Exactly. Let's take five.**
 10 A. That would be great.
 11 (Recess taken, 3:22 p.m. to 3:36 p.m.)
 12 MR. ROCHE: Back on the record.
 13 A. Mike, can I provide some additional
 14 information regarding the LPS threat assessment,
 15 danger assessment training?
 16 **Q. (BY MR. ROCHE) Sure. That's Exhibit 9?**
 17 A. Exhibit 9, correct. The attendance that
 18 you have here is for danger assessment specific
 19 training, and I think I mentioned that it was
 20 generally also included for assistant principals and
 21 principals during the suspension/expulsion training
 22 that happens early in the fall.
 23 **Q. Okay.**
 24 A. They're separate meetings. So danger
 25 assessment is in -- this training is a different, more

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1 thorough training than the training that is attached
 2 to the suspension and expulsion training that happens
 3 for just administrators.
 4 **Q. And I take it then that your recollection**
 5 **is other administrators, Kevin Kolasa, Natalie**
 6 **Pramenko, Steve Sisler, others --**
 7 A. Correct.
 8 **Q. -- participated in that annual suspension**
 9 **and expulsion training in the fall of 2013?**
 10 A. Correct.
 11 **Q. And that that suspension and expulsion**
 12 **included some information about threat assessment or**
 13 **danger assessment training?**
 14 A. Correct.
 15 **Q. And I appreciate that clarification.**
 16 MR. ROCHE: I would ask, Steve, if I
 17 could get a copy of whatever that training
 18 presentation slide show is?
 19 MR. EVERALL: Okay.
 20 MR. ROCHE: Because it sounds like it is
 21 relevant.
 22 **Q. (BY MR. ROCHE) But I appreciate that**
 23 **clarification. Now, you are aware that the Arapahoe**
 24 **County Sheriff did an investigation into the shooting**
 25 **at Arapahoe?**

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1 A. Correct.

2 **Q. And as part of that, the sheriff's**

3 **department interviewed a lot of people?**

4 A. Uh-huh.

5 **Q. Including you, including most of the**

6 **staff and faculty --**

7 A. Correct.

8 **Q. -- at the school. So I want to ask you**

9 **about one of the interviews that the sheriff did**

10 **because it goes to what we were just talking about.**

11 **(Deposition Exhibit 13 was marked.)**

12 **Q. And, I apologize, I didn't get to this or**

13 **show this to you earlier. You will see that this**

14 **document, like most of the documents we've looked at,**

15 **has got a number in the bottom corner, the ACSO 999?**

16 A. Uh-huh.

17 **Q. That indicates that this is a document**

18 **that came from the sheriff's office; although, the**

19 **title of this one actually says FBI. So it appears it**

20 **was an interview performed by an FBI agent.**

21 A. Okay.

22 **Q. I want to ask you about some comments on**

23 **the second page. So I want to direct your attention**

24 **to the second paragraph up from the bottom on page**

25 **ACSO 000100. And this relates to what we can refer to**

178

1 **as the Jeff Corson incident.**

2 A. Okay.

3 **Q. That's the international relations**

4 **teacher at Arapahoe High School, right?**

5 A. Correct.

6 **Q. And you see that you're mentioned in this**

7 **paragraph about a discussion that apparently occurred**

8 **between Jeff Corson and Tracy Murphy. Do you see**

9 **that?**

10 A. I do.

11 **Q. And it's a discussion of how upset Karl**

12 **Pierson was when he was removed as the debate team**

13 **leader, right? And it says that Murphy jokingly told**

14 **Corson words to the effect of when Karl comes up with**

15 **a gun someday, you know you've caused this, end quote.**

16 **Do you see that?**

17 A. I do.

18 **Q. And it goes on to say that they, Corson**

19 **and Murphy, continued the conversation with assistant**

20 **principal Darrell Meredith, right?**

21 A. It does say that.

22 **Q. So my question is, do you recall the**

23 **conversation that is described there?**

24 A. I do not.

25 **Q. Do you recall either Jeff Corson or Tracy**

179

1 **Murphy saying anything like that?**

2 A. I don't.

3 **Q. Okay.**

4 A. And it seems odd that I wouldn't remember

5 that conversation, but I just don't. I don't remember

6 that conversation at all.

7 **Q. Okay. Do you recall anybody at Arapahoe**

8 **saying something like that?**

9 A. I don't.

10 **Q. Okay. Let's keep going through Exhibit**

11 **11, which is the long discovery responses. There was**

12 **an incident on November 1, 2013, in Vicki Lombardi's**

13 **Spanish class regarding Karl Pierson?**

14 A. Correct.

15 **Q. Were you aware of that incident prior to**

16 **the shooting?**

17 A. I was not.

18 **Q. What about the next incident that's**

19 **described in the discovery responses in Robert**

20 **Hansen's class and heckling and bullying?**

21 A. I had no prior knowledge to that.

22 **Q. Had you heard prior to the shooting that**

23 **Karl was at least verbally a bully at school?**

24 A. No, I hadn't.

25 **Q. You've heard that since the shooting**

180

1 **though, right?**

2 A. Just in the sheriff's report, what some

3 of the kids said.

4 **Q. Okay. Now, the next item in the**

5 **discovery responses says that on November 20, 2013,**

6 **Mr. Tracy Murphy approached Ms. Pramenko after a**

7 **faculty meeting where surveillance and security**

8 **measures in general had been discussed, and he asked**

9 **about cameras being placed in the library. Do you see**

10 **that?**

11 A. I do.

12 **Q. Do you recall a faculty meeting where**

13 **Tracy Murphy shortly after the elections said, Can we**

14 **put cameras in the library?**

15 A. I don't remember him asking about it. I

16 remember the faculty meeting, because I believe it was

17 the same day as we had our lockdown drill.

18 **Q. Okay.**

19 A. And the sergeant for Arapahoe County's

20 school resource officers, Rod Pacheco, came in and

21 spoke at the faculty meeting.

22 **Q. Okay.**

23 A. They went over what they saw at the

24 lockdown drill, their impressions, different things

25 that the faculty could do, the teachers and how we

181

1 would operate differently than what we had previously
 2 done. And I think that's probably what spurred Tracy
 3 to ask for additional cameras.
 4 **Q. Okay. Were you there for the entire**
 5 **meeting?**
 6 A. I believe I was.
 7 **Q. Okay. And I'm asking that because in the**
 8 **LPS discovery responses, it says that in the process**
 9 **of that discussion at that faculty meeting, Mr. Murphy**
 10 **noted that if anything happens, it's going to happen**
 11 **here. Do you see that in the discovery responses?**
 12 A. I do. Can I offer my opinion?
 13 **Q. Well, let me ask you some questions.**
 14 A. Okay.
 15 **Q. First, do you recall Tracy Murphy saying**
 16 **that in the faculty meeting in November?**
 17 A. No.
 18 **Q. Do you recall him saying anything like**
 19 **that in the fall of 2013?**
 20 A. Not that I heard.
 21 **Q. Okay. It sounds like you have some**
 22 **thoughts on that comment?**
 23 A. I do.
 24 **Q. Why don't you tell me what those are?**
 25 A. Okay. So the way I read this, is that --

182

1 so after the meeting, after Rod Pacheco went over his
 2 findings, review of the lockdown drill, Natalie may
 3 have had a few other comments about, you know, We're
 4 heading into the end of December, finals week, you
 5 know, we're going into Thanksgiving, enjoy your break,
 6 miscellaneous comments. Faculty meeting is over,
 7 Tracy comes up to Natalie and says, Can we talk about
 8 cameras in the library? And that's when the comment
 9 was made after probably the majority, if not most all
 10 of the rest of the faculty was gone from the meeting.
 11 The forum is right next to the library.
 12 **Q. Right.**
 13 A. So the faculty meeting is over, most
 14 teachers are gone, they walk into the library and they
 15 have that conversation. And that may have been when
 16 that comment was made.
 17 **Q. Okay. Have you spoken to either Natalie**
 18 **Pramenko or Tracy Murphy about that comment?**
 19 A. No. I didn't know that comment was made
 20 until I read it in this document.
 21 **Q. Okay. And the next thing in this part of**
 22 **the discovery responses says that "On December 12,**
 23 **2013, Ms. Pramenko and others visited the library,**
 24 **among other things, to determine the appropriate**
 25 **location for new security cameras." Do you see that**

183

1 **here?**
 2 A. I do.
 3 **Q. Were you part of that visit to the**
 4 **library?**
 5 A. I was. Marked the locations on the wall.
 6 **Q. Okay. What prompted that visit to the**
 7 **library?**
 8 A. The thinking that we wanted to do things
 9 differently, remodel, get some upgrades to the library
 10 with safety and security surveillance being one of
 11 them. We had also planned on removing all of the --
 12 or not all, about half of the old wooden tables that
 13 were in there because they were several years old,
 14 falling apart, and we were going to build counter
 15 height tables around the poles that were in there.
 16 The poles are now encased, but there used to be
 17 support poles throughout the library. And we were
 18 going to build counters around them as work stations
 19 with drop down electricity and networking. It was all
 20 part of that same conversation.
 21 **Q. Okay. Who else was part of that visit to**
 22 **the library, you and Natalie?**
 23 A. Tracy.
 24 **Q. Tracy.**
 25 A. I believe Terry Davis and Brad Leitner.

184

1 **Q. And who are Terry Davis and Brad Leitner?**
 2 A. Terry Davis is director of operations and
 3 maintenance, and Brad Leitner is supervisor for
 4 interior maintenance.
 5 **Q. Okay. So they were facilities people, in**
 6 **essence?**
 7 A. Correct.
 8 **Q. Okay. Did that visit to the library on**
 9 **December 12 have anything to do with Tracy Murphy and**
 10 **his concern about Karl Pierson?**
 11 A. Not that I know of.
 12 **Q. Okay. Had Tracy -- go ahead.**
 13 A. I was there, I guess, kind of as a
 14 twofold, as I pointed out, building maintenance and
 15 operations was part of my responsibility --
 16 **Q. Right.**
 17 A. -- as well as safety and security. So we
 18 were kind of doing an upgrade, somewhat planning a
 19 makeover of the library.
 20 **Q. Okay. During the course of that visit to**
 21 **the library or the discussions leading up to that**
 22 **visit to the library, had the threat that Karl Pierson**
 23 **had made against Tracy Murphy or Tracy Murphy's**
 24 **concerns about that threat been a part of the**
 25 **discussion at all?**

185

1 A. Not that I remember.
 2 **Q. Okay. The next incident that's described**
 3 **in the written discovery is the blowup that Karl had**
 4 **in Vicki Lombardi's class. Do you see that?**
 5 A. I do.
 6 **Q. And is it fair to characterize what**
 7 **happened that afternoon as a blowup?**
 8 A. Outburst, yeah.
 9 **Q. Okay. Outburst?**
 10 A. Sure.
 11 **Q. Were you made aware of that outburst**
 12 **prior to the shooting?**
 13 A. I don't think I was.
 14 **Q. Okay. Do you know whether Esther Song or**
 15 **Deputy Englert were made aware of that incident before**
 16 **the shooting?**
 17 A. I don't know.
 18 **Q. Okay. Sorry, I'm bouncing around just a**
 19 **little bit.**
 20 **(Deposition Exhibit 14 was marked.)**
 21 **Q. Exhibit 14 is the Arapahoe Sheriff's**
 22 **report on the shooting. Have you seen that before?**
 23 A. I have.
 24 **Q. Have you read it?**
 25 A. I have.

186

1 **Q. Okay. I'm going to ask you just discrete**
 2 **questions about things that are reported in this**
 3 **report, so let me direct your attention to page 6 of**
 4 **the report, if I could. Down towards the bottom of**
 5 **page 6 in the first paragraph after Esther Song's**
 6 **name --**
 7 A. Uh-huh.
 8 **Q. -- there is a reference that says,**
 9 **"Tracy" -- Tracy Murphy -- "was told by an unknown**
 10 **school administrator the district would not support**
 11 **removing Karl from Arapahoe High School and sending**
 12 **him back to Douglas County because Karl was a senior**
 13 **and near the end of his school career." Do you see**
 14 **that?**
 15 A. I do.
 16 **Q. Do you know who that unknown school**
 17 **administrator is?**
 18 A. I don't.
 19 **Q. I take it -- is it you? Do you recall**
 20 **having a conversation with Tracy Murphy about removing**
 21 **Karl from Arapahoe and sending him back to Douglas**
 22 **County?**
 23 A. Is it me 100 percent? No. Could it have
 24 been? It could have been.
 25 **Q. Okay. Do you think more likely than not**

187

1 **that's a reference to a discussion that you had with**
 2 **Tracy Murphy?**
 3 A. I don't know about more likely than not.
 4 It could have been.
 5 **Q. Well, let me come at it a different way.**
 6 A. Okay.
 7 **Q. Do you recall having a discussion in**
 8 **which Tracy Murphy requested or suggested that Karl**
 9 **Pierson be removed from Arapahoe High School and sent**
 10 **back to Douglas County?**
 11 A. Do I remember that conversation? No, I
 12 don't.
 13 **Q. Do you remember any discussion in the**
 14 **fall of 2013 with anybody at Arapahoe, any**
 15 **administrator, any faculty member, about a request by**
 16 **Tracy Murphy to remove Karl Pierson from Arapahoe and**
 17 **send him back to Douglas County?**
 18 A. Do I remember Tracy had that
 19 conversation?
 20 **Q. That Tracy made that request.**
 21 A. No, I don't remember that.
 22 **Q. Do you remember any discussion in the**
 23 **fall of 2013 about the idea of potentially removing**
 24 **Karl Pierson from Arapahoe and sending him back to his**
 25 **home district?**

188

1 A. No.
 2 **Q. Now, do you recall reading in the**
 3 **sheriff's report that Tracy Murphy was so concerned**
 4 **about the threat that Karl Pierson made, that he**
 5 **seriously considered quitting his job at Arapahoe?**
 6 MR. EVERALL: Could you point him to
 7 that?
 8 MR. ROCHE: Sure.
 9 **Q. (BY MR. ROCHE) Page 7, right in the**
 10 **middle of the page.**
 11 A. Can you ask the question again, please?
 12 **Q. Sure. Well, my question is, did you ever**
 13 **have a conversation with Tracy Murphy where he let you**
 14 **know that he was so concerned about Karl Pierson, that**
 15 **he was seriously considering quitting his job?**
 16 A. I did not know that before the 13th.
 17 **Q. Kevin Kolasa and Esther Song didn't tell**
 18 **you that that was how serious Tracy Murphy took this**
 19 **threat?**
 20 A. No.
 21 **Q. And I guess I'm not a schoolteacher or a**
 22 **school administrator, but that suggests to me that**
 23 **Tracy Murphy was very, very concerned about this**
 24 **threat; wouldn't you agree?**
 25 A. Yes, I agree with that if you're willing

189

1 to resign.

2 **Q. I mean, you've been in education for more**

3 **than 20 years now, right?**

4 A. Correct.

5 **Q. Have you ever heard, in your career, of a**

6 **faculty member considering resigning their job and**

7 **leaving a school because of a threat that a student**

8 **made other than this one instance?**

9 A. Have I heard of it?

10 **Q. Yes.**

11 A. I have.

12 **Q. On how many other occasions?**

13 A. One.

14 **Q. And was it at Arapahoe?**

15 A. It was.

16 **Q. And what did the school do with respect**

17 **to that incident?**

18 A. I don't know what happened to the

19 student. It was when I was teaching and a student

20 threw a very large rock through a teacher's windshield

21 back in the probably late '90s.

22 **Q. Oh wow. Okay. And you don't know what**

23 **happened to that student, whether he --**

24 A. I do not.

25 **Q. I'm assuming it was a he?**

190

1 A. I can't -- I believe that it was.

2 **Q. Okay. I mean, you can't recall whether**

3 **that student was suspended or expelled?**

4 A. I don't know.

5 **Q. Did the teacher end up resigning?**

6 A. She did not. She still subs in the

7 building.

8 **Q. Okay. But that's the only other incident**

9 **that you can bring to mind from your 20-plus years of**

10 **experience where a teacher has considered resigning**

11 **their job because of a threat by a student?**

12 A. Yes.

13 **Q. During the course of the sheriff's**

14 **investigation, a lot of students were interviewed,**

15 **you're aware of that, right?**

16 A. I am.

17 **Q. A couple of things that came up during**

18 **the student interviews that I wanted to ask you and a**

19 **lot of the witnesses about, one is referenced by**

20 **students to Karl having a hit list. Do you know, had**

21 **anybody in the Arapahoe High School administration**

22 **heard formally or informally about Karl having a hit**

23 **list --**

24 A. Not that I --

25 **Q. -- prior to December 13?**

191

1 A. Not that I know of.

2 **Q. Do you know -- a number of students also**

3 **told the investigators that they were afraid of Karl,**

4 **that he was -- and I'm looking at page 11. He was,**

5 **quote, honestly scary like he is going to hurt us.**

6 **I'm a little nervous. He obviously has the potential**

7 **to be a threat if little stuff like that makes him**

8 **crazy. I'm at the bottom of page 11 and at the top of**

9 **page 12. Had you heard of students at Arapahoe High**

10 **School being afraid of Karl prior to December 13?**

11 A. I had not heard, no.

12 **Q. A number of students also told the**

13 **sheriff's investigators that Karl had either shown**

14 **them photographs of the gun that he bought or told**

15 **them about the gun that he had bought in the week**

16 **leading up to the shooting. You've heard that?**

17 A. I have -- yeah, I've read it.

18 **Q. Okay. Do you know -- have you heard that**

19 **any member of the Arapahoe administration or faculty**

20 **was aware that Karl had bought a gun in December of**

21 **2013 prior to the shooting?**

22 A. No, I don't think anybody knew.

23 **Q. Okay. Since the shooting, have you had**

24 **any conversations with either Esther Song or Kevin**

25 **Kolasa about the threat assessment that they did?**

192

1 A. No. No, I don't think so.

2 **Q. Okay. I'm weeding out exhibits to speed**

3 **things along. Have you ever looked at the threat**

4 **assessment that was actually done on Karl Pierson?**

5 A. I have not.

6 (Deposition Exhibit 15 was marked.)

7 **Q. Exhibit 15 is a progress report from the**

8 **sheriff's investigation. Do you see that there?**

9 A. I do.

10 **Q. And my guess is you have not seen this**

11 **document before?**

12 A. No, I haven't. I guess.

13 **Q. I'd be shocked if you have. You can see**

14 **that this is written by an investigator by the name of**

15 **Joni Gordanier. It's right at the front.**

16 A. Okay.

17 **Q. I don't know if you recall talking to**

18 **Ms. Gordanier as part of the sheriff's investigation.**

19 A. Not specifically. I remember an older

20 gentleman, and she may have been the officer who drove

21 me out to the sheriff's office. I don't remember.

22 **Q. Okay. And that's what I wanted to ask**

23 **you about. If you look on -- in Exhibit 15, starting**

24 **at page 5 and then continuing for several pages, it**

25 **appears to be a summary of an interview that you did**

193

1 with the sheriff's office. And my first question is,
 2 do you remember giving a statement to the sheriff's
 3 office?
 4 A. I do.
 5 Q. I want to direct your attention to page 8
 6 of 13. It's 1915 in the bottom right corner. Are you
 7 there? Are you on 1915?
 8 A. Uh-huh.
 9 Q. You'll see at the top of the page it
 10 says, When asked about Karl Pierson, Darrell said
 11 that" -- and then there is a list of statements.
 12 A. Okay.
 13 Q. Do you see that? We've covered the
 14 statement, the threat that Karl shouted to his mother
 15 in some detail. So I want to jump to the next one.
 16 It says, "Last spring and this semester, Karl had
 17 erratic behavior." Do you see that?
 18 A. Okay.
 19 Q. And I'm wondering what erratic behavior
 20 you were referring to? Obviously the threat
 21 assessment, right?
 22 A. Okay. Correct.
 23 Q. What else were you referring to? And the
 24 reason I'm asking is we just walked through the list
 25 of all of the 15 or 16 incidents that occurred prior

194

1 to the shooting, and most of them it sounds like you
 2 weren't aware of at the time they happened. So I'm
 3 wondering what erratic behavior you were aware of?
 4 A. Was -- it refers to -- mostly to the next
 5 two paragraphs.
 6 Q. Okay.
 7 A. With the Swomley incident.
 8 Q. Okay.
 9 A. The Ides of March --
 10 Q. That's The Ides of March, right.
 11 A. -- where I commented that it was odd. On
 12 the day of the 13th, I must have said erratic.
 13 Q. Okay. And then the statement goes on to
 14 say, "This started when Karl would be blowing up at
 15 his classmates, stating that they were all fucking
 16 morons and stupid idiots and stuff like that." Do you
 17 know what incident that refers to?
 18 A. I think it's still the math -- with the
 19 Swomley incident.
 20 Q. That's all Swomley?
 21 A. Uh-huh.
 22 Q. Any other incidents that you're referring
 23 to there?
 24 A. No. So that's -- I had very limited
 25 information on the 13th.

195

1 Q. And that's why I'm asking.
 2 A. Okay.
 3 Q. The statement goes on to say that "The
 4 incoherent rambling started when Karl was talking to
 5 another Assistant Principal." What is that a
 6 reference to? What incoherent rambling?
 7 A. When he was talking to Kevin about --
 8 Q. Is it The Ides of March thing?
 9 A. Ides of March, correct.
 10 Q. Okay.
 11 A. I believe the 15th is The Ides of March.
 12 Q. Yes.
 13 A. And for him to reference that while he's
 14 upset about a test grade in a conversation with an
 15 assistant principal is odd.
 16 Q. Okay.
 17 A. Or as it says here erratic.
 18 Q. Okay.
 19 A. And then I believe, from what I remember
 20 on the 13th, when I was talking to the investigators,
 21 I believe that's what I remembered the conversation
 22 kind of referring back to.
 23 Q. Okay.
 24 A. This is all referring back to Swomley.
 25 Q. Okay. And that's what I was trying to --

196

1 A. Okay.
 2 Q. -- clarify. And then there is another
 3 statement farther down. It says, "About two to three
 4 weeks ago, Campus Security saw Karl looking at weapons
 5 site on his (Karl's) computer which, besides the
 6 volatile outbreaks, is another reason that Security
 7 was aware of Karl and keeping an eye out." Do you see
 8 that?
 9 A. I do.
 10 Q. So that's a reference to the Cameron Rust
 11 and Christina Kolk telling you that Karl was looking
 12 at guns?
 13 A. It would be, yes.
 14 Q. And I guess I'm obviously a little bit
 15 confused on the timing. I've heard early October.
 16 This would suggest late November. Was it just a one
 17 incident? I don't know that the timing is so
 18 important as to how many times did that occur?
 19 A. Just once.
 20 Q. Okay. And even though you didn't follow
 21 up on that incident, you did tell security be aware of
 22 Karl and keep an eye out for him?
 23 A. Yeah. I mean, referring back to our
 24 original -- our past conversation.
 25 Q. Yes. Understood. Okay. And then the

197

1 last comment that's reported in this interview is that
 2 you said that Karl was just one of those kids you kind
 3 of get a feeling. What did you mean by that? Well,
 4 first off, did you say it?
 5 A. I must have, otherwise it wouldn't be in
 6 the report, correct?
 7 Q. I would think.
 8 A. It's tape recorded.
 9 Q. Right. I know. And -- but that's --
 10 what did you mean? I mean --
 11 A. Again, unfortunately it was with the
 12 benefit of hindsight.
 13 Q. Because by the time you gave this
 14 statement, obviously the shooting had already
 15 occurred?
 16 A. Right.
 17 Q. So you're saying -- I mean, I'm really
 18 trying to get to the bottom of this. Did you have a
 19 bad feeling in your gut about Karl prior to December
 20 13?
 21 A. No, I don't --
 22 Q. I mean, obviously he was -- for lack of a
 23 better term, he was on the radar, right, with the
 24 administration?
 25 A. That is a fair statement.

198

1 Q. As compared to Claire? Claire was not a
 2 kid who was on the radar, right? She was an --
 3 A. Good kid.
 4 Q. -- ordinary, good kid, did everything
 5 right, never a lick of trouble with her, right?
 6 A. Correct.
 7 Q. She was never on the radar. Karl was.
 8 So when you said he's the -- he was one of these kids
 9 you get a feeling about, is that what that meant, was
 10 he's on the radar and he worried us?
 11 A. If you were to ask me that question on
 12 the 12th, no.
 13 Q. Okay.
 14 A. When I had gone through what I had just
 15 gone through, I made that statement.
 16 Q. Okay. Well, let me come at it from a
 17 slightly different perspective. You're in the school
 18 at 12:30 on December 13 and the shooting starts. Once
 19 you became aware that there was an active shooter
 20 situation at the school, did a kid's name pop into
 21 your head and was it Karl's?
 22 A. Absolutely not.
 23 Q. Okay. I thought I'd never get to the end
 24 of this box.
 25 (Deposition Exhibit 16 was marked.)

199

1 Q. Exhibit 16 is a progress report written
 2 as part of the sheriff's investigation, and you'll see
 3 it's a statement that Michelle Crookham provided to
 4 the investigators. I had a couple of questions about
 5 that. At the bottom of Ms. Crookham's statement, she
 6 advised that the AHS administration will not tell the
 7 teachers anything about student discipline as it is a
 8 violation of the student's privacy rights. Do you see
 9 that?
 10 A. I do.
 11 Q. Was that a complaint that you had heard
 12 prior to the shooting from teachers at Arapahoe?
 13 MR. EVERALL: Object to form. You can go
 14 ahead and answer.
 15 A. Had I heard that before the 13th?
 16 Q. (BY MR. ROCHE) Yes.
 17 A. No.
 18 Q. Is it something that you, as part of the
 19 Arapahoe administration, heard from faculty members
 20 after the shooting?
 21 A. Yes. Yes.
 22 Q. And how widespread a concern or complaint
 23 was that among the teachers?
 24 A. You want a number?
 25 Q. Just rare, fairly common, universal. I'm

200

1 not asking for a percentage.
 2 A. Okay. Rare.
 3 Q. Okay. And is that something that the
 4 changes to the threat assessment protocols took into
 5 account when those materials and processes were
 6 updated in 2014?
 7 A. Sorry, I missed the question.
 8 Q. It was a complicated question, and I know
 9 it's late in the day. Do teachers now receive more
 10 information about student discipline than they did in
 11 2013?
 12 A. Yes, I believe so.
 13 Q. And that was one of the changes that LPS
 14 and Arapahoe High School made subsequent to the
 15 shooting?
 16 A. Correct. For example, one of the changes
 17 that we put in is an additional -- a whole additional
 18 tab in Infinite Campus where faculty can log student
 19 contact. It's called the staff contact log, and we
 20 didn't have it until January of 2014.
 21 Q. Okay.
 22 A. So it's a running dialogue of -- I
 23 believe it's 30 characters or less that faculty, any
 24 faculty, any staff, with Infinite Campus rights, and
 25 they all have the rights to use that tab, can put in

201

1 comments.

2 **Q. Okay. And the purpose of that is to do a**

3 **more comprehensive job of sharing information about a**

4 **student in crisis?**

5 A. Correct.

6 **Q. So that all of that information is**

7 **captured in one location?**

8 A. Single vortex, I believe is what they

9 call it.

10 **Q. Okay. Perfect. Thank you.**

11 **(Deposition Exhibit 17 was marked.)**

12 **Q. Do you recognize Exhibit 17?**

13 A. Can I have a minute to look at it?

14 **Q. Yes, of course. You ready?**

15 A. And I don't recognize a majority of this

16 document.

17 **Q. Okay. Are there parts of it that you've**

18 **seen before?**

19 A. Correct.

20 **Q. Okay. And let's start with -- let's call**

21 **it the first -- near as I can tell, the first ten**

22 **pages of the document, 4039 through 4049.**

23 A. I have not seen them.

24 **Q. You have not seen this document that's**

25 **titled "Administrative Review of LPS Threat Assessment**

202

1 **Protocols"?**

2 A. Correct.

3 **Q. I take it that you didn't have any input**

4 **into this administrative review?**

5 A. Correct.

6 **Q. And you have not been trained on this**

7 **document or told that it has been adopted or**

8 **implemented by LPS?**

9 A. Well --

10 **Q. Go ahead.**

11 A. -- pages 4039 through 4049 are not -- I

12 think those are just discussion items.

13 **Q. Okay.**

14 A. It's basically a review of whatever

15 committee this is, their finding --

16 **Q. Okay.**

17 A. -- from what I -- that's the way I

18 interpret what I've got here.

19 **Q. Okay.**

20 A. So I think the committee is listed

21 somewhere. Where did I see that?

22 **Q. It is. It is on the second page. There**

23 **is a list of participants.**

24 A. Correct.

25 **Q. And you're not listed, and actually**

203

1 **nobody from Arapahoe High School is listed.**

2 A. My interpretation of this is that the

3 participants had probably a fairly lengthy meeting,

4 covered most of the day, would be my guess, or 1:00 to

5 4:00 it looks like. They went over data for the

6 district and put together -- that's my interpretation.

7 **Q. But you haven't seen that or been told**

8 **about that --**

9 A. I have not.

10 **Q. -- prior to today?**

11 A. Now, pages --

12 **Q. 4050 through --**

13 A. 54, I am familiar with those.

14 **Q. And those are the threat assessment**

15 **documents and some of the other --**

16 A. Right.

17 **Q. -- collateral forms that go with it?**

18 A. That is correct.

19 **Q. Let me ask you about page 4055, which is**

20 **a template document titled "Threat Assessment Review**

21 **Meeting."**

22 A. Okay.

23 **Q. You've got that in front of you?**

24 A. I do.

25 **Q. Is that a document that you're familiar**

204

1 **with?**

2 A. I believe we have used this. I have used

3 this.

4 **Q. And I don't know, so I'll just ask, is**

5 **this a new template that was created after the**

6 **shooting for the second layer of review that is done**

7 **with some threat assessments?**

8 A. I think it is. I'm not 100 percent

9 positive, though. It could be something that was used

10 previously.

11 **Q. And that was my next question. Do you**

12 **recall using this threat assessment review meeting**

13 **form at Arapahoe High School prior to the shooting?**

14 A. I don't remember using it, no.

15 **Q. Okay. And we've talked -- I talked**

16 **briefly about page 4056, 4057?**

17 A. Correct.

18 **Q. Early imminent warning signs for school**

19 **violence, you said you hadn't seen that document**

20 **before?**

21 A. This?

22 **Q. Yes.**

23 A. Yes, I have seen that.

24 **Q. You have seen that?**

25 A. Correct. That was in one of the previous

205

1 exhibits that we talked about that's part of the new
 2 training.
 3 **Q. Oh, you're right. Okay. And this is**
 4 **something that is now trained on for administrators,**
 5 **teachers, and other staff, right?**
 6 A. Correct.
 7 **Q. Okay. What about the template document**
 8 **that is shown on page LPS 4058? Is that a newly**
 9 **created template that came into existence after the**
 10 **shooting?**
 11 A. It is.
 12 **Q. What about the individual safety and**
 13 **supervision plan that is at page 4060?**
 14 A. I think that's a revision to a previous
 15 document.
 16 **Q. Okay. But this was updated after --**
 17 A. Correct.
 18 **Q. -- December of 2013 as well? And what**
 19 **about -- the balance of this exhibit from 4061 through**
 20 **4102 are a series of threat assessment forms and**
 21 **protocols from other school districts. Do you see**
 22 **that?**
 23 A. I do.
 24 **Q. And have you seen any of those --**
 25 A. I have --

206

1 **Q. -- form threat assessment protocols from**
 2 **those other districts prior to today?**
 3 A. I have not.
 4 **Q. And have you had any discussions with any**
 5 **of the participants in this administrative review of**
 6 **the LPS threat assessment protocols about the process**
 7 **they went through as described in Exhibit 17?**
 8 A. Have I had conversations with them? I
 9 have not.
 10 **Q. Okay. Unfortunately I don't have copies**
 11 **of these documents, so I'm just going to ask you a**
 12 **couple of questions about them. Shortly after**
 13 **returning to school for the last semester of 2014,**
 14 **there was an administrative team meeting, just one of**
 15 **your regular weekly meetings. And there is a**
 16 **reference to a -- in the safety security section to a**
 17 **staff feedback form, question mark. Do recall**
 18 **anything about doing a safety or security staff survey**
 19 **to get feedback?**
 20 A. Yes, we did. It was a Google form where
 21 teachers could either go through -- do it anonymously
 22 or assign their name and it was -- had a -- gosh, it
 23 probably had ten different questions that some of them
 24 were on a scale and some of them were open ended with
 25 the ability to provide comment.

207

1 **Q. Okay. And were those feedback forms**
 2 **taken and then collected and put into a report of some**
 3 **kind?**
 4 A. Yeah, it was all via Google form, so it's
 5 all electronic.
 6 **Q. Okay.**
 7 A. And it was compiled, reviewed by the
 8 administrative team and with the faculty and the staff
 9 in August of 2014.
 10 **Q. Okay. And --**
 11 A. When was that meeting? I'm sorry.
 12 **Q. Sure. The meeting that I'm referring to**
 13 **is February 10 --**
 14 A. Okay.
 15 **Q. -- of 2014.**
 16 A. So we probably --
 17 **Q. Well, before you we get into that, I**
 18 **wanted to ask a couple other questions about it.**
 19 **First off, it sounds like the answers were collected**
 20 **and a report was generated or a collection of those**
 21 **comments was generated somehow in a Google form?**
 22 A. Uh-huh. Correct.
 23 MR. ROCHE: Steve, I think that would be
 24 of interest to me so I would like to get a copy of
 25 that.

208

1 MR. EVERALL: What exactly do you want
 2 now?
 3 MR. ROCHE: The document that Darrell is
 4 referring to.
 5 MR. EVERALL: A form?
 6 THE DEPONENT: Well, it would be a staff
 7 feedback survey from the spring of 2014.
 8 MR. EVERALL: All right.
 9 **Q. (BY MR. ROCHE) Do you recall what some**
 10 **of the safety and security concerns were that the**
 11 **faculty pointed out in that survey?**
 12 A. Not specifically without having it in
 13 front of me.
 14 **Q. Okay. Do you recall -- did Arapahoe make**
 15 **any changes to its safety and security policies based**
 16 **on the feedback it got from the staff in that survey?**
 17 A. I believe we made a couple immediate
 18 changes regarding locking the doors, classroom doors.
 19 I'm trying to remember the survey and a lot of the
 20 feedback. The district had already started to address
 21 that, but it was completed over the summer with the
 22 ability to lock all of the classroom doors from the
 23 inside. That had been a concern. It was voiced
 24 fairly loudly in this survey.
 25 **Q. The teachers wanted to be able to lock**

209

1 **their classroom doors from the inside?**
 2 A. Correct.
 3 **Q. Okay.**
 4 A. I think the addition for additional
 5 campus -- full-time campus supervisors was voiced
 6 pretty loudly and we did that.
 7 **Q. Okay.**
 8 A. Those are two items I remember that were
 9 on the survey that were addressed almost immediately.
 10 **Q. Okay. And it's my understanding that**
 11 **beginning in 2014 at Arapahoe, there was a newly**
 12 **instituted weekly campus security meeting, something**
 13 **along those lines?**
 14 A. No. It was from when I was hired with
 15 campus supervisors. Is that what you're referring to?
 16 **Q. Yes. There was weekly meetings between**
 17 **you, for instance, Rob Mauler, James Englert,**
 18 **Christina Kolk?**
 19 A. Correct.
 20 **Q. Those meetings occurred prior to 2014?**
 21 A. Correct.
 22 **Q. But then they were -- then what changed**
 23 **is they started being written down --**
 24 A. Correct.
 25 **Q. -- beginning in 2014?**

210

1 A. Right.
 2 **Q. Okay. And the purpose of these meetings**
 3 **was to make sure that everybody had the same**
 4 **information about the safety and security issues that**
 5 **people were aware of, right?**
 6 A. Sure. And I referred to it with a
 7 comment or the looking at the guns scenario. When I
 8 said the campus supervisor meeting, I had established
 9 as soon as I was hired a campus supervisor meeting
 10 every, as best as I could, Monday afternoon.
 11 **Q. Okay.**
 12 A. At 1:15 we would meet, we would talk
 13 about student concerns, address other concerns,
 14 parking, safety and security with campus supervisors.
 15 I always tried to include the school resource officer
 16 that was there.
 17 **Q. Okay.**
 18 A. January -- our first meeting I don't
 19 think was until the end of January, beginning of
 20 February we began taking notes or recording minutes.
 21 **Q. Okay. Fair enough. And I wanted to ask**
 22 **just a couple of questions about those minutes, and**
 23 **I'm trying to see if I can figure out the date of this**
 24 **one and I don't -- February 10 of 2014, there was one**
 25 **of these campus security meetings with Darrell**

211

1 **Meredith, you, Rob Mauler, James Englert, and**
 2 **Christina Kolk. And one of those notes says staff**
 3 **feedback form is on hold until official police report**
 4 **is out, which will be after the investigation is**
 5 **completed. Okay. Do you recall there being a time**
 6 **when the staff security feedback was put on hold**
 7 **pending the outcome of the sheriff's investigation?**
 8 A. I don't know a timeline. I know the
 9 Google form was probably completed in -- before the
 10 faculty went on break for summer break in 2014, and I
 11 don't remember -- when was the sheriff's report?
 12 **Q. It was in October.**
 13 A. Okay.
 14 **Q. And I guess my question was, was there a**
 15 **decision made at Arapahoe to delay getting the faculty**
 16 **feedback on security issues until after the sheriff**
 17 **released his report?**
 18 A. It may have been our initial thinking,
 19 but that's not what happened.
 20 **Q. Okay.**
 21 A. Yeah, I'm almost positive that that
 22 Google form, that survey was closed probably June 1 of
 23 2014 and there was a lot of feedback.
 24 **Q. Okay. Let's take five minutes.**
 25 **(Recess taken, 4:45 p.m. to 4:55 p.m.)**

212

1 MR. ROCHE: Back on the record.
 2 **Q. (BY MR. ROCHE) There are clearly lessons**
 3 **to be learned from what went right and what went wrong**
 4 **at Arapahoe leading up to the shooting that took**
 5 **Claire's life and that really is the focus of what**
 6 **we're trying to do in this arbitration. So the last**
 7 **thing I want to cover with you, and I'll preview, I'm**
 8 **going to do this not just with you, but with every**
 9 **witness, is find out from you, because you're in the**
 10 **building every day, what additional tools and**
 11 **resources would be helpful at Arapahoe to help do a**
 12 **more comprehensive job of identifying kids in crisis**
 13 **and preventing tragedies like this one.**
 14 A. That's the question?
 15 **Q. Yes. I mean, it really is that broad and**
 16 **open ended. What else do you guys need?**
 17 A. People.
 18 **Q. More people. Security guards --**
 19 A. No, in general.
 20 **Q. -- teachers, administrators, what?**
 21 A. In general. In general. Let me think
 22 about it. You asked me the question, what do we need?
 23 In the last -- well, my last eight years at Arapahoe
 24 we've been cut anywhere between 20 and 25 percent.
 25 **Q. In personnel?**

213

1 A. Correct.

2 **Q. Okay.**

3 A. So it's people. I mean, we're in the

4 people business.

5 **Q. Okay.**

6 A. And to be effective at that, the more

7 one-on-one interaction or as close to one-on-one

8 interaction you can have, the better it's going to be.

9 I'm not expecting one on one.

10 **Q. Sure.**

11 A. But it has gotten better. I mean, we

12 have four full-time campus supervisors, which we've

13 never had. We have two school resource officers,

14 which we've never had. That's a step in the right

15 direction. We have additional counseling. We went

16 from four to six. Big improvement. That helps with a

17 whole range of things with all of the students and the

18 faculty at Arapahoe. We've gone from one school

19 psychologist to next year having two full-time school

20 psychologists. That's a huge improvement. It's a

21 little self-serving, maybe people might say it's even

22 selfish, an additional administrator would be huge.

23 **Q. No, and that's fine. I mean, I asked the**

24 **question because at the end of this arbitration, there**

25 **are going to be reports written about what do schools**

214

1 **need and what are the recommendations that are going**

2 **to be made --**

3 A. Sure.

4 **Q. -- so that schools can do a better job of**

5 **making sure this kind of thing doesn't happen in the**

6 **future. So that's why I want to get as comprehensive**

7 **of an answer as you're comfortable giving.**

8 A. I don't know -- gosh, Mike, we could

9 spend another three or four hours on that question,

10 but we don't need to. If you really want to know and

11 you want to put it in some sort of report or how to

12 improve, there's a variety of things. But people is

13 at the top. I think more site-based management, even

14 more than what we have in regards to listening to the

15 people who work in the building based on safety and

16 security.

17 **Q. Okay.**

18 A. I mean, I don't want to throw Mike under

19 the bus, that's the thing, with him in the room, I'm

20 going to say some things that he may not want to hear.

21 And the people thing is huge, and that's kind of been

22 his -- and I know we're not supposed to talk about the

23 other people in the room, it affects on what I say.

24 That affects what I say right now.

25 **Q. And that goes to my next question, which**

215

1 **is are there obstacles -- I mean, obviously there are**

2 **financial obstacles to getting everything on any**

3 **school's wish list.**

4 A. Sure. Right.

5 **Q. Are there other obstacles to -- you know,**

6 **as the guy in the building every day, are there other**

7 **obstacles that prevent the existing faculty and staff**

8 **in administration from doing everything that they**

9 **would like to do when it comes to the safety and**

10 **security of the students who go to that school?**

11 A. Are there obstacles?

12 **Q. Yes, and what are they?**

13 A. Well, in my opinion, district security is

14 an obstacle.

15 **Q. In what way?**

16 A. Having to rely on their people, their

17 personnel, and their control of someone, the safety

18 and security of Arapahoe High School.

19 **Q. So you would like that to be more**

20 **decentralized and controlled inside the building?**

21 A. Correct. But then that goes back to

22 personnel --

23 **Q. Understood.**

24 A. -- facilities. We don't have a room. We

25 can't even get all of our classrooms. I mean, we

216

1 can't get kids into -- we don't have enough space.

2 **Q. Right. You've got the annexes over on**

3 **the north side.**

4 A. Sure. So if we had a high school -- if

5 each high school had their own security officer, truly

6 security, truly security, not campus supervisors,

7 campus security. That's not a very reasonable

8 expectation though, because of facilities, wiring, the

9 electronics, the technology, the personnel. Do you

10 see what I'm saying?

11 **Q. Sure.**

12 A. But if I'm a consultant and I want to

13 make a more secure high school, that's one of the

14 things I would do.

15 **Q. Okay. What about the culture at a school**

16 **like Arapahoe? It's obviously a very well-respected**

17 **school, it's a blue ribbon school. 90-plus percent of**

18 **kids go to post secondary education, all of that. Is**

19 **the emphasis on the reputation of the school or the**

20 **academic achievement of the school something that in**

21 **your mind creates an obstacle to keeping the school**

22 **safe?**

23 A. Oh, no. I would almost go the other way.

24 **Q. No, and I do understand that.**

25 A. For example, I stay there for a reason.

217

1 **Q. Sure.**
 2 A. I mean, not all of my memories are real
 3 nice about Arapahoe High School, but most of my
 4 memories are what I would want for my kids, your kids,
 5 that's what I want, and that's how I have always
 6 operated, helped to operate whatever school I am in.
 7 I want the school to be a school where I want my kids
 8 to go.
 9 **Q. Sure.**
 10 A. So culture-wise, do we have issues? We
 11 do. You pointed out very early this morning, I think,
 12 about drug and alcohol violations, which if you look
 13 at our school report card, it's comparable to other
 14 big high schools. Is it a problem? It is, but drugs
 15 and alcohol, that's a whole other issue, societal
 16 issue. But culture-wise, we say it, and it's not just
 17 lip service, we try to take care of each other, we
 18 really do. You find it in the spirit from Link Day
 19 all the way up to graduation.
 20 **Q. Okay.**
 21 A. Like I said, there is a reason I stay at
 22 Arapahoe High School because it's -- yeah, it's blue
 23 ribbon. We have academic accolades, but if it wasn't
 24 19 miles from my son, he would be there as a 10th
 25 grader. He would have come last year, but it is just

218

1 too much.
 2 **Q. Sure.**
 3 A. I mean, I live 19 miles away. But that's
 4 how highly I think of Arapahoe, and it's not because I
 5 work there. I thought that when I worked at Heritage
 6 High School.
 7 **Q. Okay.**
 8 A. When I interviewed at Ponderosa to be the
 9 principal three months ago, I told them that. There's
 10 no reason Ponderosa High School shouldn't be just like
 11 Arapahoe. And it may have ruffled some feathers, but
 12 I believe it. If we could make every high school like
 13 Arapahoe High School, December 13 as the outlier, high
 14 school education would be a much better entity I
 15 think.
 16 **Q. Okay.**
 17 A. Does that answer your question in a
 18 roundabout way?
 19 **Q. Yes. I mean, it's a very broad question.**
 20 **I really wanted to know what you thought about the**
 21 **improvements that can be made and the impediments to**
 22 **making those improvements. And I think you've told me**
 23 **that, and I appreciate it. Thanks for coming in. I**
 24 **know this wasn't easy for you in a lot of ways.**
 25 A. Well --

219

1 **Q. But I do appreciate you coming in, and I**
 2 **hope you understand the spirit in which I ask some of**
 3 **the difficult questions that I had to ask.**
 4 A. I do. Yeah, I do.
 5 **Q. So I think that's all I've got. So I**
 6 **think you may not get home by 5:00 for dinner but**
 7 **you'll --**
 8 THE DEPONENT: Did you want anything
 9 else?
 10 MR. EVERALL: No.
 11 WHEREUPON, the within proceedings were
 12 concluded at the approximate hour of 4:06 p.m. on the
 13 30th day of June, 2015.
 14 * * * * *
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220

I, DARRELL MEREDITH, do hereby certify
 that I have read the above and foregoing deposition
 and that the same is a true and accurate transcription
 of my testimony, except for attached amendments, if
 any.
 Amendments attached () Yes () No

 DARRELL MEREDITH

The signature above of DARRELL MEREDITH
 was subscribed and sworn to before me in the county of
 _____, state of _____,
 this _____ day of _____, 2015.

 Notary public
 My Commission expires:

Michael Davis, et al. 6/30/15 (am)

221

REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, ASHLEY D. MAHE, Registered Professional Reporter and Notary Public, ID 20084033353, State of Colorado, do hereby certify that previous to the commencement of the examination, the said DARRELL MEREDITH was duly sworn by me to testify to the truth in relation to the matters in controversy between the parties hereto; that the said deposition was taken in machine shorthand by me at the time and place aforesaid and was thereafter reduced to typewritten form; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not employed by, related to, nor counsel for any of the parties herein, nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my signature this 14th day of July, 2015.

My commission expires September 24, 2016.

- Reading and signing was requested.
- Reading and signing was waived.
- Reading and signing was not required.

REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, ASHLEY D. MAHE, Registered Professional Reporter and Notary Public, ID 20084033353, State of Colorado, do hereby certify that previous to the commencement of the examination, the said DARRELL MEREDITH was duly sworn by me to testify to the truth in relation to the matters in controversy between the parties hereto; that the said deposition was taken in machine shorthand by me at the time and place aforesaid and was thereafter reduced to typewritten form; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

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Ashley D. Mahe
Registered Professional Reporter

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