

1 JAG NO: 2015-0665A

2 DEPOSITION OF: JEFFREY G. CORSON - July 21, 2015

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 JEFFREY G. CORSON was taken on behalf of the Claimants
14 at 950 17th Street, Suite 2400, Denver, Colorado
15 80202, on July 21, 2015, at 9:36 a.m., before
16 Ashley D. Mahe, Registered Professional Reporter and
17 Notary Public within Colorado.

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I N D E X

EXAMINATION OF JEFFREY G. CORSON: PAGE
 July 21, 2015

By Mr. Roche 4

DEPOSITION EXHIBITS: (Previously marked) INITIAL REFERENCE

Exhibit 13 Federal Bureau of Investigation, 16
 12/18/13

2

A P P E A R A N C E S

For the Claimants:
 MICHAEL J. ROCHE, ESQ.
 Lathrop & Gage, LLP
 950 17th Street
 Suite 2400
 Denver, Colorado 80202

For the Respondent:
 STEVE EVERALL, ESQ.
 Semple, Farrington & Everall, P.C.
 1120 Lincoln Street
 Suite 1308
 Denver, Colorado 80203

For Jeffrey G. Corson:
 J. ANDREW NATHAN, ESQ.
 Nathan Dumm & Mayer P.C.
 7900 East Union Avenue
 Suite 600
 Denver, Colorado 80237

Also Present:
 Michael Davis
 Desiree Davis
 Carol Lembke
 William Woodward
 Michael Jones

4

1 WHEREUPON, the following proceedings were
 2 taken pursuant to the Colorado Rules of Civil
 3 Procedure.
 4 * * * * *
 5 JEFFREY G. CORSON,
 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, Mr. Corson. Thanks for**
 11 **coming in. You and I just met a few minutes ago. As**
 12 **you know, my name is Mike Roche, and I represent Mike**
 13 **and Desiree Davis in connection with the arbitration**
 14 **that is occurring in conjunction with Littleton Public**
 15 **Schools. I wanted to first thank you for coming in**
 16 **and giving your testimony today. I think you've**
 17 **probably heard this is an important process, and I**
 18 **wanted to just touch briefly on what the purpose of**
 19 **this arbitration is and what it is not.**
 20 **As you may have heard, the purpose is to**
 21 **learn more about the facts and circumstances that led**
 22 **up to the shooting that occurred on December 13, 2013,**
 23 **and to find out what lessons there are to be learned**
 24 **from that tragedy and what improvements can be made to**
 25 **school safety, not just at Arapahoe High School, but**

5

1 throughout Colorado. Do you understand that?
 2 A. Uh-huh.
 3 Q. And as I mentioned, Bill Woodward from
 4 the Center for the Study and Prevention of Violence
 5 from the University of Colorado is here. He will be,
 6 in conjunction with others, preparing a report on what
 7 is learned through this process, and it will be
 8 provided to, among others, a committee that was
 9 established just in this last legislative session so
 10 that that legislative committee can make
 11 recommendations on how to improve school safety based
 12 on what we learned in this process.
 13 So that is the perspective that I'll be
 14 coming from as I ask you questions. As I said, one of
 15 the things I wanted to just let you know is what is
 16 not the purpose of this arbitration, and the purpose
 17 is not to find fault or blame for what happened on
 18 December 13. The person responsible for Claire's
 19 murder is Karl Pierson, and we're not here to make
 20 accusations or cast blame for anything else that
 21 happened on that or the days and weeks leading up to
 22 it. So I wanted you to understand that as well.
 23 A couple of rules of the road that I go
 24 through with every witness in a deposition, you've
 25 probably covered some of these with Mr. Nathan, are,

6

1 first, I don't expect this deposition to run terribly
 2 long, but it's not meant to be an endurance test. So
 3 if you ever want to take a break, just let me know.
 4 Okay. Second, Ashley is going to take down everything
 5 that I say and everything that you say and everything
 6 that Mr. Nathan or Mr. Everall or anyone else in the
 7 room says. And because she is doing that, it's
 8 important that we don't talk over one another. And
 9 then the last thing I like to cover with every witness
 10 is Ashley can't take down head shakes or uh-huhs or
 11 huh-uhs, so verbal responses are important. Okay?
 12 A. (Deponent nodded head up and down.)
 13 Q. Is that a yes?
 14 A. Yes.
 15 Q. Thank you. And then, actually, there is
 16 one other thing I want to touch on, and that is if I
 17 ask a question, and I will, that doesn't make sense to
 18 you, will you tell me that you don't understand the
 19 question so I can fix it?
 20 A. Yes.
 21 MR. EVERALL: Mike, remind him of the
 22 sequestration order, please.
 23 MR. ROCHE: Sure.
 24 Q. (BY MR. ROCHE) I don't know if you've
 25 been told about this or not, but the judge who is

7

1 overseeing this arbitration has entered an order
 2 called a sequestration order, and in essence what that
 3 means is he has directed that the witnesses not
 4 discuss their testimony with anybody else. Do you
 5 understand that?
 6 A. Yes.
 7 Q. I take it you have not, at this point,
 8 discussed any of the depositions that have occurred to
 9 date in this case?
 10 A. No.
 11 Q. Will you just state your name and your
 12 job for the record.
 13 A. Jeff Corson. I'm a social studies
 14 teacher at Arapahoe High School.
 15 Q. One other thing I'm going to ask is,
 16 you're a little bit soft spoken, if you could speak up
 17 a little bit. We've got a lot of people in the room,
 18 and I know everybody is interested in hearing what you
 19 have to say.
 20 A. My name is Jeff Corson, and I'm a social
 21 studies teacher at Arapahoe High School.
 22 Q. And how long have you worked at Arapahoe?
 23 A. I think eight -- this will be nine, year
 24 nine.
 25 Q. Year nine. And what classes do you teach

8

1 at Arapahoe typically?
 2 A. So social studies classes, you can teach
 3 a bunch, but the last few years, my load has been
 4 western civ and psychology and international
 5 relations.
 6 Q. Okay. And I guess one background
 7 question, did you ever have Claire Davis in a class?
 8 A. No.
 9 Q. And I understand that you had Karl
 10 Pierson in a class in the 2013-2014 school year?
 11 A. Yes.
 12 Q. Was that the only class that you had with
 13 Karl Pierson?
 14 A. Yes.
 15 Q. When you started the 2013-2014 school
 16 year and had Karl in your international relations
 17 class, did you know anything about him?
 18 A. Nothing.
 19 Q. Hadn't heard of him, hadn't encountered
 20 him in any context?
 21 A. No.
 22 Q. Didn't know him by reputation?
 23 A. No, I did not.
 24 Q. So what is your first memory of Karl
 25 Pierson?

9

1 A. My first memory is -- I want to say it
 2 was the first day of class, certainly the first week
 3 of class, and I -- you know, I'm just getting to know
 4 the students, and I do recall he was -- you know, you
 5 could tell he was a verbal kid and just kind of
 6 remembering, Who is this guy that definitely wants a
 7 little bit of attention?
 8 **Q. Okay. He was seeking your attention or**
 9 **the attention of the other students in the class?**
 10 A. Yeah, I think he was just -- you just got
 11 the -- you know, you go through a room, and you can
 12 kind of tell who wants to remain silent and out of it
 13 and who wants a little attention. And I got that
 14 sense from him.
 15 **Q. Okay. And as I understand it, at the**
 16 **beginning of that semester in your international**
 17 **relations class, you had the kids fill out some kind**
 18 **of a form, a tell-me form, something like that?**
 19 A. Yeah. Yes.
 20 **Q. Tell me about that form, and if you**
 21 **remember, what Karl put on it.**
 22 A. I don't remember exactly, but what I do
 23 is it's a little form, and I have everybody fill it
 24 out. And I don't know, you know, any of the kids, and
 25 I might read through several hundred of these, but

10

1 it's a way for me, you know, to get to know the kids
 2 because I'd say learning styles, questions like that.
 3 And at the end of it, I always write,
 4 Hey, is there anything else I should know or something
 5 like that. And I don't remember exactly what he said,
 6 but I do remember it was kind of bizarre. And so it
 7 was just another one of those flags. And I don't
 8 think I knew who he was at that point, but I started
 9 putting things together like here is a kid who wants
 10 attention, here is a kid that said something bizarre.
 11 You know, it was kind of like, I won't stop talking in
 12 class or I won't stop -- I'm relentless or something
 13 like that. And I was just kind of like, Okay, who is
 14 this kid. And then probably later that week, there
 15 was another thing in class that was kind of a little
 16 bit of a -- you know, a red flag, who is this guy.
 17 **Q. And when you say "red flag," does that in**
 18 **your mind -- tell me what that means.**
 19 A. It just means he was -- I knew he was a
 20 different kind of kid, you know, so -- you know,
 21 something like that. I guess that's what I meant.
 22 **Q. Just a kid to watch more closely than**
 23 **your average high school student?**
 24 A. Well, it was just a different wording.
 25 Most people say, Oh, I want to be seated next to the

11

1 front or I have trouble -- or I have ADD or I have
 2 something like this. And some people say things that
 3 are funny, and they try to get your attention that
 4 way. It just seemed a little more demanding. And
 5 like I said, he just seemed a little bit of a
 6 demanding kid, whether that be attention or a strange
 7 statement. And so that's kind of what I mean.
 8 **Q. Okay. But within the first day or two in**
 9 **class, he was at least sort of on your radar?**
 10 A. Yeah, maybe that's a better way of
 11 putting it, on my radar.
 12 **Q. And then as I understand it, also during**
 13 **that first week there was a behavioral problem with**
 14 **Karl?**
 15 A. Yeah. Yeah. I'm just kind of -- like I
 16 said, I had a lot of students, but this one I was
 17 piecing together pretty quickly, because I don't
 18 remember the exact context of the conversation. But
 19 in my international relations class, you know, there's
 20 freshmen, sophomores, juniors, seniors, it's an
 21 elective, it's packed to the gills. And, you know, my
 22 thing is I want everybody to feel comfortable. And a
 23 lot of times a freshman, you know, isn't going to feel
 24 comfortable with a senior.
 25 And Karl was definitely, like I said,

12

1 kind of wanting attention. I think it was maybe the
 2 first day he said something about being a member of
 3 the debate team and he went to nationals. I didn't
 4 even know how he got that in. It kind of struck me
 5 like, Oh, he wants to get it in. He wants to have
 6 everybody know how important he is, because it wasn't
 7 like I was asking, Hey, raise your hand if you've been
 8 on the national team.
 9 **Q. Right.**
 10 A. It wasn't like that. He found a way to
 11 get it in. So it was just another, okay, this guy
 12 wants attention kind of thing. So there was that, and
 13 then there was a little girl sitting pretty close to
 14 him, and I don't remember what the conversation was,
 15 but she -- you know, she just asked a question, a
 16 question that she said out loud to everybody. I don't
 17 remember what it was. And to him, and maybe to a
 18 bunch of people, it was kind of obvious. But I
 19 encourage questions and stuff like that.
 20 **Q. Of course.**
 21 A. And Karl just kind of made a, Well,
 22 that's stupid. It was kind of under your breath but
 23 not really under your breath. You know what I mean?
 24 It was like people could hear. And so my way of
 25 dealing with that was to address it in front of the

13

1 whole class.

2 **Q. Okay.**

3 A. I didn't single him out at that point or

4 anything like that. I just say, Hey, here's the

5 ground rules for my class. I didn't look at him. I

6 didn't embarrass him. I said it to everybody, kind of

7 moved around like that. And I just said, Hey, there

8 are no silly questions. I encourage questions. Thank

9 you very much for that question. Here is the answer,

10 and I just want everybody to have basically respect

11 for one another. And then I just kind of, you know,

12 went on. I addressed it, he knew I was talking to

13 him, but I didn't embarrass him publicly.

14 **Q. Okay. Well, let me ask you about that.**

15 **You said it was sort of under his breath, it wasn't an**

16 **outburst?**

17 A. It was audible. It was clearly audible.

18 So people heard it.

19 **Q. He didn't raise his voice or anything?**

20 A. He didn't scream it or anything, no, no.

21 **Q. Okay. And what was his demeanor when --**

22 **first when he made the comment, Oh, that was stupid,**

23 **and then after you addressed it in front of the class?**

24 A. Arrogant was his demeanor. He was

25 definitely -- I got the sense that, you know, he was

14

1 rather cocky, and, you know, high school boys, I have

2 a lot of cocky boys. But he definitely was a cocky

3 boy.

4 **Q. Okay. And after you addressed and said,**

5 **There are no stupid questions, I expect the kids to**

6 **respect one another in my classroom, what was his**

7 **demeanor in response to that?**

8 A. He did not talk back or anything. He

9 just kind of -- I don't know if this will be visible,

10 but it was kind of like that, kind of maybe looking

11 down. I don't want to say in absolute humility, but

12 it was more like a -- you know, one of those where he

13 was going to comply with what I asked, but he still

14 had a little bit of an air of arrogance.

15 **Q. Okay. And based on that, did you get the**

16 **sense that he was kind of a verbal bully? That's a**

17 **term we've heard used to describe Karl Pierson several**

18 **times.**

19 A. Well, at that point, I didn't know him at

20 all. I had never met him, and so my first thought was

21 really more to investigate. So, like I said, I

22 definitely got the sense that he was kind of an

23 arrogant, cocky guy, and by saying that in class, I

24 wasn't going to allow that. And so I wanted to kind

25 of investigate. I did have a situation with him after

15

1 class.

2 **Q. And that was going to be my next**

3 **question. After that class ended where you had this**

4 **incident where he said that this freshman girl's**

5 **question was stupid, did you keep him after?**

6 A. I tried.

7 **Q. Okay. And he didn't stay? You asked him**

8 **to stay after class?**

9 A. Yeah, and that was another -- that's very

10 unusual. Like I said, he complied with my request to

11 be quiet, but then after class -- you know, it's my

12 practice usually not to embarrass someone publicly.

13 So when class is dismissed, I just said, Hey, can you

14 hold on for a second after class? I didn't mad dog

15 him, as we say. I didn't stare him in the eye or

16 anything like that. I kind of looked away and

17 finished up some questions with some kids, and I

18 expected him to stay there. And when I was finishing

19 up, he had left.

20 **Q. And that struck you as unusual?**

21 A. Very.

22 **Q. Had that ever happened in your career as**

23 **a teacher, you asked them to stay after class and they**

24 **didn't?**

25 A. I remember any -- maybe somebody I asked

16

1 earlier in class, and they forgot to stay, but this

2 was a little bit different.

3 **Q. This struck you as more arrogant and more**

4 **deliberate?**

5 A. Yes.

6 **Q. All right. And did that raise more flags**

7 **in your mind about what's going on with this kid?**

8 A. Yeah. That's why I wanted to go see who

9 it was.

10 **Q. Okay.**

11 A. So I went to investigate a bit.

12 **Q. And, again, this also -- I should have**

13 **told you this. This is certainly not to be a memory**

14 **test. So I'm going to give -- actually, in this book,**

15 **MR. ROCHE: Here, I'll give you a copy.**

16 **I think everybody else already has one.**

17 **Q. (BY MR. ROCHE) In this book at tab 13 is**

18 **a statement that you gave to the FBI as part of the**

19 **investigation. So that's sort of my roadmap for a lot**

20 **of the questions that I'm asking you, and I don't know**

21 **if this will help refresh your recollection about what**

22 **you did and when you did things, but I did want to**

23 **have that available to you. Do you recognize**

24 **Exhibit 13 as a statement that you gave?**

25 A. Yes.

17

1 **Q. Okay. And I guess one question I have**
 2 **is, have you actually seen this before? I don't know**
 3 **whether or not this would have been provided to you**
 4 **after it was prepared?**
 5 A. Yes, I think this is --
 6 THE DEPONENT: Is this the exact copy in
 7 preparation for yesterday that you pulled out?
 8 MR. NATHAN: He saw it yesterday during
 9 the meeting with me.
 10 MR. ROCHE: Okay. Perfect.
 11 **Q. (BY MR. ROCHE) And I definitely don't**
 12 **want to get into any discussion that you and**
 13 **Mr. Nathan had because those are privileged. But I**
 14 **kind of figured this is something you would have**
 15 **looked at.**
 16 A. Yes. I hadn't read through it all, but
 17 we did look through it generally.
 18 **Q. Okay. And you can see at the bottom of**
 19 **the first page, there is a reference to the incident**
 20 **we're talking about where you told Karl Pierson to**
 21 **stay after class and he did not. And why did that**
 22 **concern you?**
 23 A. Because that's insubordination, to use a
 24 strong word, but that just doesn't usually happen, and
 25 so added with a couple of things that we had been

18

1 discussing, I thought I needed to further investigate
 2 who this student is.
 3 **Q. Okay. And so literally by the end of the**
 4 **first week of the first semester of the '13-'14 school**
 5 **year, you had had a number of different things that**
 6 **had caught your attention about Karl Pierson and**
 7 **raised concerns in your mind; is that fair?**
 8 A. Yes.
 9 **Q. Okay. And after this incident where you**
 10 **asked Karl to stay after class and he didn't, you**
 11 **mentioned you investigated --**
 12 A. Yes.
 13 **Q. -- who is this kid, right?**
 14 A. Yes.
 15 **Q. And what were you hoping to find out?**
 16 A. I just wanted to know what made him tick
 17 and what his -- you know, what his problem was, what
 18 his beef was, what angle does -- how does he see the
 19 world, what's going on, how do I reach this kid.
 20 **Q. Okay. So tell me what you did in terms**
 21 **of trying to get answers to all of those questions.**
 22 A. I remember asking several fellow social
 23 studies teachers, Hey, have you ever had this kid
 24 before? I had not had him. I had not heard of him,
 25 and so I wanted to know if they had any history that

19

1 would be helpful to me.
 2 **Q. Okay. And I know ultimately you wound up**
 3 **having a conversation with Tracy Murphy about Karl**
 4 **Pierson?**
 5 A. Yes.
 6 **Q. And we're going to get to that in just a**
 7 **minute. Did you have -- as part of your discussions**
 8 **with the other social studies teachers, did you have**
 9 **-- did you run into anybody who knew this kid?**
 10 A. Yes.
 11 **Q. Who did you talk to and what did they**
 12 **say?**
 13 A. I remember trying to talk to several
 14 people. I think I talked to Brad Meyer. I think I
 15 talked to Karen Gerlich, maybe somebody else. I do
 16 remember learning from Karen Gerlich that he was a Boy
 17 Scout, and so I thought, you know, that has generally
 18 very positive connotations. So that made me feel a
 19 little bit better. And then, I don't remember, maybe
 20 Brad, maybe somebody else, but then someone said,
 21 Well, who really knows him is Mr. Murphy because he's
 22 on the debate team. And so that's where I ultimately
 23 went.
 24 **Q. Do you recall any of the discussions with**
 25 **Brad Meyer?**

20

1 A. I really don't. They were more like
 2 hallway discussions. I don't remember anything
 3 specific. I think he may have been the one that said,
 4 you know, go to Tracy.
 5 **Q. Okay.**
 6 A. They certainly weren't long
 7 conversations, but, you know, he's the department
 8 chair, and, you know, I often will throw things by
 9 him.
 10 **Q. Sure. And then somebody, whether it was**
 11 **Murphy or Brad Meyer or Karen Gerlich, somebody**
 12 **directed you to Tracy Murphy and so you went to him?**
 13 A. Yes.
 14 **Q. And tell me about that conversation.**
 15 A. I remember going in and sitting down, you
 16 know, and I just basically said, Hey, I have a kid in
 17 class, this kid Karl. Had a situation with him in
 18 class, and I remember his response was kind of like,
 19 Oh, no. You know, like, I guess the word I'd use
 20 would be annoyed maybe like, Oh, boy, another thing.
 21 **Q. Okay. And was this all on the same day**
 22 **as the incident that you had where Karl had told the**
 23 **kid she was stupid and that her question was stupid?**
 24 A. I can't recall. I would like to say my
 25 recollection would be maybe, you know, within the next

21

1 day or three.

2 **Q. Okay.**

3 A. You know, I think I may have checked with

4 someone else and then checked with this and then find

5 the time when I could go -- it was pretty quickly, but

6 I don't remember if it was the first day.

7 **Q. Okay.**

8 A. I don't think it was probably.

9 **Q. And do you recall, other than Tracy being**

10 **annoyed that there was another incident involving Karl**

11 **Pierson, any other details of that conversation?**

12 A. Yeah, definitely. He -- you know, again,

13 he kind of had an exasperated look and basically said

14 something like, you know, Karl has been, you know --

15 had lots of -- several problems or something like

16 that. And I remember him telling me an example. He's

17 like, Well, for instance, you know, we take them

18 publicly to these debate competitions or whatever.

19 And he said, you know, Karl tries to be funny, he

20 tries to be smart, and he doesn't represent Arapahoe

21 High School well. And so he said, for example, he was

22 doing this speech in front of somebody and he opened

23 it with this line, I forget what it was, but obviously

24 referenced the male anatomy, and it was very -- you

25 know, not appropriate, and it seemed to be the perfect

22

1 example for him to tell me about because it was

2 shocking, attention seeking, you know, all of those

3 things. And I basically said, Well, that makes sense

4 with what I've seen in class because he is sort of

5 attention seeking. So then Tracy asked, Well, hey,

6 what happened in class? And then I told him. And,

7 you know, it's just a code amongst teachers, you do

8 not call somebody stupid. You just don't do it. That

9 is not the environment that we want to create.

10 **Q. Sure.**

11 A. So he was again more exasperated and

12 definitely disappointed.

13 **Q. Okay. And as I understand it, from the**

14 **statement that Tracy Murphy gave, one of your**

15 **questions was, Any advice on how I can get through to**

16 **this kid? Murphy's response was essentially, Good**

17 **luck?**

18 A. Yeah, that's funny I didn't -- yeah, I

19 kind of forgot about that, but, yeah, I mean, that was

20 essentially what I was seeking. And it was basically

21 you could tell he was exasperated, and so I wasn't

22 going to get a lot of -- you know, he wasn't having

23 much success.

24 **Q. Okay. After this -- well, first off,**

25 **have you told me everything you can remember about**

23

1 **that first conversation with Tracy Murphy?**

2 A. Yeah. I'm just picturing us there, and

3 that's pretty much what I recall. I mean, it's hard

4 to remember over this period of time all of the

5 specifics. I more recall the affect, the gist of it.

6 **Q. Are you talking about Tracy's affect?**

7 A. He was just like, Oh, oh. Like that.

8 **Q. Sure. He was just --**

9 A. Yeah. So I don't remember all of the

10 details, but I remember that example.

11 **Q. Okay. And what was your feeling after**

12 **this discussion with Tracy Murphy? Were you even more**

13 **concerned about Karl Pierson at that point?**

14 A. I wouldn't say -- I don't think at that

15 point I felt more concern. I think I felt maybe the

16 same thing Tracy felt, exasperated. And I also felt

17 like -- I don't know if I felt it at that point, but I

18 definitely -- you know, what was being tried wasn't

19 working.

20 **Q. Okay.**

21 A. I definitely felt that later. So I can't

22 remember how much of that I felt at that time.

23 **Q. Okay.**

24 A. But I definitely remember, okay, this is

25 going to be a tricky one.

24

1 **Q. Okay. And when I say "concerned," I**

2 **didn't necessarily mean concerned that he was going to**

3 **be violent. It could even be concerned this is going**

4 **to be a long semester with this kid.**

5 A. I just remembered I wanted to make my

6 classroom safe, and this guy has got a mouth. And I

7 have to figure out a way to make kids feel at home in

8 my class.

9 **Q. Sure.**

10 A. You know, and not feel like he's going to

11 pull that stupid thing again.

12 **Q. Sure. So after your discussion with**

13 **Tracy Murphy, did you pull Karl aside at some point**

14 **and say, Look, I asked you to stay after class, you**

15 **didn't, we need to talk about this?**

16 A. No.

17 **Q. Okay.**

18 A. I didn't because he wasn't in class.

19 **Q. Okay.**

20 A. So there was a gap. So --

21 **Q. Tell me about that.**

22 A. -- my recollection is I had this

23 conversation, and I'm -- I'll do the best I can on the

24 chronology.

25 **Q. And, again, if it helps, feel free to**

25

1 **look at your statement, because I think that may help**
 2 **explain the gap that you're about to describe.**
 3 A. Okay. But without --
 4 **Q. Sure.**
 5 A. My recollection, without looking at
 6 anything, was I had the conversation with Tracy and
 7 then I went to -- and then I think it was the next day
 8 or something like that, at some point, you know, I
 9 just left that. And I had heard from another kid who
 10 was in two of my classes. There was a kid in my
 11 western civ class and also in my IR class. She was a
 12 senior, she was in both classes, and she was in my
 13 western civ class, and she said, Hey, Mr. Corson, that
 14 guy in our international relations class, he was
 15 really upset after school, after something, and he was
 16 screaming in the parking lot or something like that.
 17 And I didn't want her to, you know, elaborate, but in
 18 my mind, I'm going, Okay.
 19 So I wanted to know what that was all
 20 about. So I talked to Tracy a different time, and
 21 then I think as a result of, you know, what happened
 22 at the meeting and the blowup and all of that, then he
 23 was not in school for a while. So at that point, I
 24 didn't have the time to talk to him or the opportunity
 25 because he was away from class.

26

1 **Q. So that was the timing I was trying to**
 2 **make sure I understood.**
 3 A. I didn't -- yeah, that's where I'm --
 4 **Q. So the senior who told you that Karl had**
 5 **had -- had either flipped out or blown up after the**
 6 **meeting with Tracy Murphy, did she go into any detail**
 7 **about what happened or how she knew about it?**
 8 A. I don't remember a lot. What I do
 9 remember is the impression that he was loud, like he
 10 was screaming something. I don't think she gave me
 11 much specifics on -- I don't think she -- I don't know
 12 if she even knew what he said. She just said he was
 13 really upset. And how she learned about that, you
 14 know, she's involved in a lot of after-school
 15 activities, and I'm sure -- you know, I got the
 16 impression that she was, you know, leaving. And it
 17 was sometime after school, and she was finally on her
 18 way home and she kind of overheard it. And that's
 19 when I just thought, Oh, I better find out what
 20 happened from Tracy.
 21 **Q. Okay. Can you tell me who this student**
 22 **was? We're going to redact the names from the record.**
 23 A. You know, when you ask me names -- I want
 24 to say -- I've got her. I can tell you a lot of
 25 things about her. She's right there. I think it was

27

1 (THE STUDENT).
 2 **Q. Oh, okay.**
 3 A. Am I hitting the right name?
 4 MS. DAVIS: You are.
 5 **Q. (BY MR. ROCHE) Okay. Did she mention**
 6 **that there was a threat or do you recall?**
 7 A. I don't believe -- I don't recall her
 8 saying anything about a threat, just volume.
 9 **Q. And after your discussion about Karl**
 10 **flipping out, after this meeting with Tracy Murphy,**
 11 **what did you do?**
 12 A. Can you clarify that? You mean after I
 13 heard from (THE STUDENT) about the meeting with Karl?
 14 **Q. Yes. Right.**
 15 A. So eventually I just went -- I think I
 16 kind of ran -- I went up to the library, and as I
 17 recall, we kind of met at the drinking fountain or
 18 something like that. And then I said, Oh, hey, I
 19 heard -- you know, I heard you had a meeting with Karl
 20 and it didn't go so well. And it was kind of like
 21 that's an understatement. I'm not saying that was his
 22 exact word, but that was the gist.
 23 **Q. That was his affect?**
 24 A. Yeah. That was the first thing we said.
 25 **Q. And how long did that conversation with**

28

1 **Tracy Murphy last?**
 2 A. It was pretty brief, because it was at
 3 the water fountain, at the drinking fountain. But I
 4 remember vividly, at least part of it, because, you
 5 know, he was like, Hey, it went really bad. And he
 6 didn't go into a lot of detail about it, because we
 7 were in the hallway but I vivid -- I definitely
 8 remember him saying something like, Well, you know, if
 9 he comes after me with a gun, or something like that,
 10 you know, you know what happened or it's your fault or
 11 something like that. And, you know, it was definitely
 12 said as, you know, like a joke, but it was a joke that
 13 didn't feel -- you know what I mean, like when you say
 14 like someone going postal or something like that. You
 15 know, you hear things like that. But it didn't feel
 16 right. I mean, we kind of paused. I just remember
 17 pausing going, oh, that's weird. And maybe because he
 18 linked it to me. And just felt like, Oh, that's
 19 weird. And so -- I don't remember the timing on this,
 20 but that's when I decided, you know, I should just go
 21 tell somebody about this.
 22 **Q. Okay. So we're clear, this conversation**
 23 **with Tracy Murphy that you're describing at the water**
 24 **fountain, that was, it sounds like, very shortly after**
 25 **-- strike that. I'm sorry.**

29

1 **The conversation with Tracy Murphy at the**
 2 **water fountain was the day after Murphy's meeting with**
 3 **Karl Pierson?**
 4 A. I don't remember for sure.
 5 **Q. Okay.**
 6 A. But I do know that it wouldn't have been
 7 a long time after. It would have been, you know,
 8 within a day or two. I don't remember the days or if
 9 there was a weekend in between or a day in between,
 10 but it would have been -- you know, because I remember
 11 hearing it from (THE STUDENT), and then going to him.
 12 And, you know, we had classes all day, so I don't know
 13 when I would have been able to make the trip to see
 14 him.
 15 **Q. And Murphy's comment to you in that**
 16 **conversation was something to the effect of, Well, if**
 17 **Karl comes after me with a gun, you'll know why?**
 18 A. Yeah. Yeah. You'll know what happened
 19 or it's your fault. It was a smart-alecky kind of
 20 remark.
 21 **Q. And obviously there's a reference to a**
 22 **conversation like that in your statement, and it makes**
 23 **more sense now. And I'm -- it's on page 1,000. If**
 24 **you look at the bottom right, there is a reference in**
 25 **the second paragraph up from the bottom where, "Murphy**

30

1 **jokingly told Corson words to the effect of, 'When**
 2 **Karl comes up with a gun someday, you know you caused**
 3 **this.' Do you see that?**
 4 A. Yeah.
 5 **Q. It sounds, based on what you just told**
 6 **me, as though perhaps the FBI agent didn't get the**
 7 **statement exactly right. It was more along the lines**
 8 **of, When Karl comes up with a gun someday, you'll know**
 9 **what caused this? Does that sound closer to what**
 10 **happened that day than what's written here?**
 11 A. I don't know for sure.
 12 **Q. But you would -- I mean, certainly Tracy**
 13 **wasn't suggesting that you --**
 14 A. No.
 15 **Q. -- would be the cause --**
 16 A. Yeah.
 17 **Q. -- for Karl showing up with a gun?**
 18 A. Right. Yeah. It was just, you know --
 19 yeah. He wasn't blaming me or anything like that. It
 20 was just kind of a jokey thing, but a joke that didn't
 21 fit well, it didn't sit well.
 22 **Q. And was Tracy visibly upset or did he**
 23 **appear scared to you as he was making these comments?**
 24 A. I didn't see it like that because he was
 25 making a joke, but yet the joke itself was weird, you

31

1 know. So that's what I think -- like I didn't -- you
 2 know, it was a joke so he wasn't -- so that's the way
 3 I interpreted it. But as I thought about it for a
 4 second and paused, this doesn't feel right. It's my
 5 job to tell somebody. And, again, I don't remember
 6 the timing or chronology, but I know shortly
 7 thereafter I went to go see -- and I realize the
 8 statement doesn't say that, but I went to go talk to
 9 Darrell because Darrell was my supervising teacher or
 10 whatever, administrator.
 11 **Q. Right.**
 12 A. And, again, I don't remember the timing
 13 of it, but I remember going down the hall and going in
 14 the counseling area where his office was, and as I
 15 walked down there and I went into that little area and
 16 his secretary's office, there's a seat and stuff and
 17 Tracy was already there. And, again, I don't remember
 18 the timing of -- if it was the next day or later that
 19 day, but I went in there, and I was relieved. I
 20 remember feeling a sense of relief going, Okay, cool,
 21 Tracy is talking, because Tracy knows what happened.
 22 I know what happened. I just heard this comment, and
 23 it didn't sit well, and I felt like I should tell
 24 somebody. So I went in to do so and Tracy was already
 25 doing it. I assumed he was talking about it, and I

32

1 said something like, Oh, okay, good, I'm glad we're
 2 talking. I'm glad you're talking.
 3 **Q. Okay. And when you went down to talk to**
 4 **Darrell Meredith with Tracy Murphy, at that point were**
 5 **you aware that Karl had threatened to kill Tracy**
 6 **Murphy?**
 7 A. No, I don't believe I was. I don't
 8 remember exactly what he told me. I don't remember
 9 specifically a threat to kill. I just remember, you
 10 know, more generic terms like flipped out or went
 11 crazy or went screaming, you know, something like
 12 that. I don't remember -- and I may have even heard
 13 threatening. I remembered it was a big deal. I
 14 remembered it was like, you know, this shouldn't
 15 happen.
 16 **Q. Okay.**
 17 A. But I don't remember a specific kill
 18 threat at the time. I think the reason why it was
 19 elevated on my radar was because of the comment Tracy
 20 made. I don't remember if Tracy told me all of the
 21 details of what happened. I don't think he did,
 22 because like I said, we were in a public area. So I
 23 think that's what elevated it in my mind.
 24 **Q. Okay. And so as a result of it being**
 25 **elevated in your mind, you went from that conversation**

33

1 to Darrell Meredith's office --

2 A. Yes.

3 Q. -- to let him know that you were

4 concerned?

5 A. Yes.

6 Q. And you got there, Tracy was already

7 there?

8 A. Yes.

9 Q. Tell me about your conversation with

10 Darrell Meredith that day.

11 A. Well, it was very brief, because Tracy

12 was already there. So I kind of felt like, Okay, this

13 has been taken care of. But I do remember -- like I

14 didn't even sit down in there. They were already --

15 had been having a conversation, and I came in, and I

16 saw it was covered. And then I remember walking away,

17 and I think I walked away with Darrell, and I remember

18 thinking this. I just know that, you know, he flipped

19 out and all of that, and I remember making a comment

20 like, you know, He sounds like he lost it, you know,

21 and I have some experience with kids that have, you

22 know, dysregulation issues and emotional -- and it

23 seemed to me like, you know, he was that kind of kid

24 like -- because that was my frame of reference. My

25 frame of reference was he just has no filter. He just

34

1 says what's on his mind. He must have said something

2 bad and loud and screaming. I mean, who yells at a

3 principal like that? You know, you just don't do

4 that, or a teacher in this case. So, anyways, I made

5 a comment like, you know, Well, at least he got it out

6 or he's that kind of kid. I didn't think he was the

7 kid that would -- I don't know the right word here,

8 but like hold it in. What's the word? You know,

9 become bitter or just go inward with it. There's a

10 word I'm not figuring out.

11 MR. NATHAN: Oppress.

12 THE DEPONENT: Yeah, something like.

13 A. But, you know, when you sit there and you

14 get angrier and angrier because you oppress or keep it

15 in, I didn't think he was that kid. So in some

16 senses, I thought him screaming out like that would be

17 just a sign of who he was. And so as I'm trying to

18 figure out this kid, I thought he was the kid without

19 the filter. It made sense because, you know, in my

20 class, he just said what came to his mind, you know,

21 he was just that filterless kid.

22 Q. (BY MR. ROCHE) He wasn't the type to

23 bottle it up?

24 A. Bottle it up. Thank you. That's where I

25 was going with that.

35

1 Q. No problem. So during your conversation

2 with Meredith, and I guess Tracy Murphy as well that

3 afternoon, did you have any discussions about what

4 Tracy Murphy should do?

5 A. Wait, say that -- that conversation with

6 Darrell? Can you repeat that?

7 Q. Sure. In your conversation with Darrell

8 Meredith, did you have any discussions about what

9 Tracy Murphy should do in light of this blowup with

10 Karl?

11 A. No. It wasn't that type of conversation.

12 It was, you know, they had had their thing, and so we

13 were on the way out. And it was, as I recall, kind of

14 a brief -- more of my comment than a conversation. I

15 don't remember Darrell saying anything more about it.

16 I don't remember. He may have said something, but I

17 -- you know, it wasn't like we were sitting there

18 having a conversation. We were kind of talking and

19 walking.

20 Q. Okay. And what about during your

21 conversation with Tracy Murphy on this day? Did you

22 have any discussions with him about what he should do

23 or what he was thinking of doing?

24 A. No.

25 Q. Okay. And in looking at your

36

1 statement -- and, again, I'm on this page ACSO 1000,

2 you mentioned to the FBI agent that you were concerned

3 about Pierson because of the incident and so you

4 called Karl's mother?

5 A. Yes. And I think the chronology -- I'll

6 do my best on the chronology.

7 Q. Thanks.

8 A. That doesn't seem -- well, I didn't read

9 it in context, but it's not exactly as you said. I

10 think I had the conversation kind of in my

11 investigative phase. So I don't remember -- it was

12 definitely before this incident at the water fountain.

13 So I think -- at least I think, I think that, you

14 know, I was talking to teachers, they pointed me to

15 Tracy, and somewhere in there I called Mom.

16 Q. But that was before the -- Karl flipped

17 out after the meeting with Tracy as best as you can

18 recall?

19 A. Hold on. Let me try to piece some things

20 together.

21 Q. Sure.

22 A. You know what, actually -- I don't want

23 to say that for sure. I'm not sure.

24 Q. Okay.

25 A. Because in some ways it doesn't make

37

1 sense because I remember -- I think I was mainly
 2 concerned because I wanted -- when he came back --
 3 because he was gone from class, there was a period
 4 when he was gone from class. And I knew he had
 5 flipped out. And so my concern was, When he comes
 6 back to class, how are we going to handle this? So
 7 somewhere in there I called Mom, and I remember -- I
 8 remember it because I wanted to spend some time with
 9 her.

10 I think we had a -- kind of called a
 11 couple of times to get connected. And I remember
 12 actually even walking on the track with her and -- not
 13 with her, but on the phone. You know, I don't like to
 14 talk when there are a lot of people around, and I just
 15 wanted to focus. So I remember going outside where
 16 nobody would bug me and we could have an extended
 17 conversation. And I don't think I wanted to pry about
 18 that. So I think maybe it was after the incident or
 19 whatever because I wasn't trying to pry, but I was
 20 trying to find out what the heck to do with this kid.

21 **Q. Okay. So tell me, as best as you can**
 22 **recall, what you said and what Mrs. Pierson said**
 23 **during that conversation.**

24 A. It was a long time ago, but I remember
 25 trying to be, you know, kind of open ended. Hey,

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1 we've had some problems with Karl in class. I
 2 understand there's some other problems outside going
 3 on, referring to Tracy and all of that or something.
 4 I think I was just trying to be open-ended was
 5 basically -- and I wanted to see what she would tell
 6 me.

7 And, again, I don't remember all of the
 8 details, but I'm pretty clear on the affect. I could
 9 definitely say she was frustrated. I got the sense
 10 that she had basically said things like, I've tried
 11 everything. This has been hard. Karl is a different
 12 bird. I don't think she used that word, but that's
 13 the way I'm doing it. Things like that.

14 **Q. About how long did your call last, if you**
 15 **remember?**

16 A. You know, I think it was a pretty good
 17 conversation. I mean, pretty lengthy, as far as
 18 parent conversations go. I mean, I don't think it was
 19 a three-minute -- I would say it was 20 minutes, 30
 20 minutes, something like that. I don't know. I just
 21 remember her kind of venting not specific things, but
 22 definitely, Hey, I've tried -- you know, I've tried
 23 different things. We've -- he's always struggled with
 24 this. We've seen some improvement over time, but then
 25 we go and have a problem again or something like that.

39

1 I don't know. I remember thinking -- I think teachers
 2 always kind of get a -- try to get a read on the
 3 parents. You know, we always just do that. And I
 4 think I remember trying to read, you know, is she an
 5 enabler or is she trying, you know, what is -- what's
 6 her role in all of this?

7 **Q. Okay. And what was your read?**

8 A. What she told me -- what she said with
 9 words -- like she didn't try to get him out of the
 10 consequence. It definitely must have been after the
 11 thing because, you know, some parents will try to get
 12 their kid out of the consequence. They'll argue to
 13 try to get them out. And I remember that I thought it
 14 was admirable that she wasn't doing that. She
 15 basically said he deserves whatever the consequence.
 16 You know, and he's had lots of these, and he doesn't
 17 quite learn from them, you know, things like that.

18 **Q. Okay. When she talked about the notion**
 19 **that she had been dealing with this for a while and**
 20 **had tried different things, did she give you any**
 21 **details on what she had tried? Punishment,**
 22 **counseling, medication? Did she go into any of those**
 23 **details?**

24 A. I don't recall exactly. When you say the
 25 word "medication," I kind of want to think that she

40

1 may have mentioned that. I just don't remember any
 2 specific med she said or anything like that. I don't,
 3 but it kind of rings a bell when you bring it up like
 4 that.

5 **Q. Did she talk about Karl's father at all**
 6 **or his home life or anything like that?**

7 A. I don't recall anything about the father.
 8 I did have a conversation with the father later --

9 **Q. Right.**

10 A. -- at conferences, but I don't remember
 11 her telling me anything about the father or the
 12 situation. She could have. Like I said, she was kind
 13 of blathering on for a while. I just don't recall it.

14 **Q. Okay. And in Exhibit 13, your statement**
 15 **to the FBI it says, "They talked about anger issues**
 16 **and she understood Murphy's position and decision**
 17 **regarding the debate team issue." Can you recall**
 18 **anything else or any details about your discussion**
 19 **with Barbara Pierson about Karl's anger issues?**

20 A. I just remember trying to figure out kind
 21 of how he dealt with the anger kind of thing. I think
 22 I was -- you know, like I said, I've experienced some
 23 of this. I know something about this, and so I think
 24 we were talking about, you know, emotional regulation
 25 terms. You know, I think I was talking about like

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1 lizard brain and stuff like that. I think I said,
 2 Well, you know, is it like when he goes off he's in
 3 lizard brain? You know, that immediate response where
 4 you don't really know what you're saying or you don't
 5 -- you know, you're not thinking clearly in the
 6 moment. And so I think I was trying to get her feel.
 7 Was he just going off and then he would come back,
 8 show remorse, you know, those kinds of things. I
 9 didn't, like I said, get into that whole incident. So
 10 I had to be careful the way I tread, so we just talked
 11 generally about maybe how he would respond because I
 12 think my main concern was, okay, when he comes back,
 13 how am I going to handle this with him? What makes
 14 him tick, and how can I do that so he would be
 15 successful?

16 **Q. And did she give you any sense of what**
 17 **made him tick? I mean, I obviously read your**
 18 **statement that said she didn't really seem to have**
 19 **much insight into that, but did you draw any**
 20 **conclusions about what made him tick based on your**
 21 **conversations with Barbara Pierson?**

22 A. No. It was kind of frustrating because,
 23 I mean, it was almost the same feeling I had with
 24 Tracy. Good luck or this is going to be hard. You
 25 know, it was that -- that's the sense. The sense was,

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1 I've tried a lot, we haven't had much success. You
 2 know, and she could have said something like, you
 3 know, We've tried everything or -- you know, that's
 4 the sense I got.

5 **Q. Okay.**

6 A. She didn't give me a roadmap or any
 7 clues, I'll tell you that.

8 **Q. Okay. After your conversation -- well,**
 9 **first, is there anything else that you can remember**
 10 **about your conversation with Barbara Pierson that we**
 11 **haven't talked about?**

12 A. I mean, there may have been related type
 13 of things like, you know, again, if you're thinking
 14 about that emotional dysregulation or amygdala, I
 15 mean, if she was always being calm, so I may have --
 16 we may have talked about that saying, Hey, I'm going
 17 to try to be very calm and to be the calm that he
 18 can't if there is a problem. And I took a certain
 19 tact -- I may have asked about, you know, how would he
 20 feel about helping other -- I could have said little
 21 things like that. That's just the avenue we were
 22 going.

23 **Q. Okay. And after your discussion with**
 24 **Barbara Pierson, did you then go back to Tracy Murphy**
 25 **or Darrell Meredith or anybody at the administration?**

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1 A. No.

2 **Q. Other than your one conversation with**
 3 **Darrell Meredith that we've talked about, did you ever**
 4 **have any discussions before the shooting about Karl**
 5 **Pierson?**

6 A. I want to say no. Definitely -- because
 7 what happened was, you know, when he came back, you
 8 know, talk about -- you know, I kind of reintegrated
 9 him in a certain way and it worked out really well. I
 10 mean, we literally had no problems. So I had no
 11 cause for concern. You know, I run into Darrell every
 12 once in a while and talk -- you know, I could have
 13 mentioned his name before or something like that, but
 14 we definitely didn't have any sort of conversation
 15 because I didn't know anything else was going on.

16 **Q. Right. And I was going to get into that**
 17 **part now. In your statement to the FBI, you mentioned**
 18 **that, I did not see Pearson for a few days after this**
 19 **whole incident and you wondered if he was suspended as**
 20 **a result of what had happened with Tracy Murphy. Do**
 21 **you recall that?**

22 A. Yes.

23 **Q. And do you recall not knowing whether he**
 24 **had been suspended?**

25 A. Yes.

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1 **Q. Okay. And is that typical for you to not**
 2 **know whether or not a student in your class has been**
 3 **suspended?**

4 A. Well, usually what happens is I'll get an
 5 e-mail with a form I can print out, and it will say,
 6 This student has been suspended. It will not say why,
 7 but it will say the length of time they're suspended
 8 and how to make up their assignments, because by law,
 9 we're required to do that, and they have to have an
 10 opportunity to do that. So I think I was kind of
 11 waiting around for one of those, but I don't think I
 12 got one, so that's why I was wondering.

13 **Q. And more generally is it -- do you**
 14 **believe that it would be useful and helpful for the**
 15 **teachers, such as yourself, to be told not just that a**
 16 **student has been suspended but also why they were**
 17 **suspended?**

18 A. You know, as teachers, I mean, we're kind
 19 of -- I mean, I'm kind of on both sides of this issue,
 20 so it's hard for me to really respond, I mean, because
 21 we all have different jobs. And so as a teacher, I
 22 think sometimes we want to know why, but I also know
 23 there's, you know, rights involved and reasons why we
 24 can't. So I think maybe in the back of my mind I was
 25 definitely wondering, because I still had this

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1 nebulous idea of what happened out there because it
 2 wasn't really filled in. And maybe for a personal
 3 reason I would want to know, but I know there's a lot
 4 of other factors out there that I'm not privy to.
 5 **Q. Okay.**
 6 A. Does that make sense?
 7 **Q. Yes. And I understand that and I**
 8 **appreciate that. I have heard that other teachers**
 9 **expressed their frustration that they were not told by**
 10 **the administration at Arapahoe anything about**
 11 **disciplinary problems involving students and that that**
 12 **was a frustration of theirs. So I guess my question**
 13 **is, is that also something that you have heard from**
 14 **other faculty members?**
 15 A. Yes, I've heard other faculty members --
 16 **Q. And is that a frustration that you share?**
 17 A. Not necessarily.
 18 **Q. Okay.**
 19 A. I completely understand the rights part
 20 of it and have an actual appreciation for that. It
 21 is hard because you have to trust the people that
 22 gather the information to do the right things with it.
 23 But I also know that you have to safeguard those
 24 individual rights. I just know that from other
 25 personal situations. So it's complex. It's very

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1 complex.
 2 **Q. Sure.**
 3 A. And I appreciate the complexity of that.
 4 (Per stipulation of counsel, the complete
 5 question and answer were redacted.)
 6 **Q. Okay. Appreciate that.**
 7 MR. ROCHE: I want to go off for just one
 8 second.
 9 (Recess taken, 10:35 a.m. to 10:47 a.m.)
 10 MR. ROCHE: I think we've reached a
 11 stipulation that there will be certain parts of the
 12 last question and answer that will be redacted once
 13 the transcript is prepared.
 14 **Q. (BY MR. ROCHE) And, Mr. Corson, we're**
 15 **going to give you the opportunity to review the**
 16 **transcript and make any requests about redaction that**
 17 **you may have. Okay?**
 18 A. Yes.
 19 **Q. Thank you. All right. Let's go back**
 20 **into our discussion. After your conversation --**
 21 **strike that.**
 22 **After Karl Pierson returned to your**
 23 **classroom in September, it sounds like you were still**
 24 **trying to decide how to deal with it; is that right?**
 25 A. Yes.

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1 **Q. And from your statement, it looks like**
 2 **one of the ways that you decided to do that was by**
 3 **enlisting him to help in the class?**
 4 A. Yes.
 5 **Q. Help me understand your thought process**
 6 **in how you chose that approach, because there were**
 7 **obviously a lot of different approaches that you could**
 8 **have taken?**
 9 A. Sure. Well, the first thing is I saw
 10 what people had been trying wasn't working.
 11 Secondly, just kind of with the stuff I mentioned
 12 before, like the need for attention, the need to be
 13 perceived as smart. You know, like I said, he found a
 14 way to wiggle in his stats on, you know, the debate
 15 team national, blah, blah, blah. I could just tell he
 16 needed that approval. And everything else wasn't
 17 working.
 18 So I think I wanted to talk to him before
 19 he came in class, but I don't think I knew when he was
 20 coming to class. So what I recall is that I think he
 21 was just in class one day, I think. He made it back,
 22 and I didn't want to do something publicly in front of
 23 the whole class. So as I recall, it was after that
 24 class. I think maybe at the beginning I said, Hey --
 25 I wonder what if I -- I don't exactly remember how I

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1 did it, but basically I said, Hey, can we -- hang on.
 2 I don't think I -- I can't remember if I tried to tell
 3 him to stay because that time it didn't work out so
 4 well.
 5 **Q. Sure.**
 6 A. I think I took a different approach, and
 7 I think maybe I might have -- the last few minutes of
 8 class grabbed him before he left. So I just said,
 9 Hey, can you hold on for a second? Maybe that's how I
 10 did it. But I do remember going outside and kind of
 11 walking around, however we got there, and he was kind
 12 of nervous. You could tell he was a little bit on
 13 edge, kind of thing, and I just wanted to soften that
 14 edge. So I just said -- I just kind of blurted out,
 15 and I just kind of got straight to the point. I
 16 didn't belabor what happened. I didn't ask him any
 17 questions, I didn't do any of that.
 18 I just said, Here's the deal, you're a
 19 smart guy, you're a senior, you have background
 20 information. And I just said, Listen, there are kids
 21 in here that have no background information because
 22 we're throwing all of this information about different
 23 countries and current events that sort of requires
 24 some historical background when you're talking about
 25 current events. And I go, You have some of that, and

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1 I need you to bring it to the table. I want you to
 2 help me with that, and you've got to appreciate the
 3 fact that other people don't have that. And so for
 4 the class to be successful, I want to enlist your
 5 support. And I didn't just say him, I said you, and I
 6 may have named someone else in the class, another
 7 senior, something like that because I didn't -- I
 8 don't know, I just wanted to make it a little more
 9 collective like that. And at the end of that, I was
 10 just kind of watching his affect. He bought into it.
 11 I mean, he -- and it wasn't a line. It's the truth.
 12 I really believed that, but some kids will be like
 13 yeah, yeah, whatever, you know, you're just -- but he
 14 seemed to really appreciate it. Like he needed that
 15 kind of thing.

16 **Q. And that's one of the things I'm**
 17 **interested in is, what was his demeanor after being**
 18 **asked to share his wisdom with your class?**

19 A. It was surprisingly good. I think I was
 20 kind of watching it like is he going to roll his eyes
 21 at this, and he didn't. It wasn't like that at all.
 22 In fact, I think he legitimately appreciated that and
 23 needed that. That was my perception. And I asked
 24 him, Hey, can you do this? And he said, Yes, yes, I
 25 can do it. Absolutely.

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1 **Q. And it sounds like he was -- he enjoyed**
 2 **and appreciated being asked?**

3 A. He did.

4 **Q. It stroked his ego?**

5 A. Yeah.

6 **Q. Which is part of why you did it, right?**

7 A. Exactly. And part of me is like -- I'm
 8 not going to lie, I don't like to stroke an ego of a
 9 cocky guy, to be honest. But it was what was required
 10 in my opinion.

11 **Q. Okay. And certainly from what I've seen**
 12 **of the investigative documents, doing that worked,**
 13 **right?**

14 A. It really worked.

15 **Q. Tell me about that.**

16 A. Well, the main thing I can say is that
 17 there is not much to say because I don't think I had
 18 hardly any other instances of problems. I think there
 19 may have -- you know, he is a verbal guy and he may
 20 have said smart -- you know, because he's a smart
 21 aleck. He would have said some things, and I think I
 22 remember on one other occasion maybe saying something
 23 on a very minor deal. But by and large, it was
 24 really, really good. Just you saying that, just made
 25 me remember something I didn't remember before.

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1 In my class it's -- there's a lot of
 2 simulations. Ironically the whole class is about how
 3 to resolve conflict without balance. Honestly, that's
 4 -- you know, it's international relations. And I do
 5 this in a similar fashion. I have -- I'll break the
 6 classroom into two sets, just like this. I'll have a
 7 table like this and then a set of tables like that.
 8 They make a big long thing.

9 And I used to teach arbitration and
 10 mediation, and so we basically had a mediation. And
 11 we would have a dispute, and I would have two
 12 simultaneous groups doing this. And I would bring
 13 outsiders in, and I remember telling one of the
 14 outsiders -- I'm very strategic about who I put in
 15 each group. And I said, Hey, you know, here's this
 16 kid, he's had some problems earlier. He's doing
 17 really good. And I put this girl that was the
 18 mediator, all right, she is a student from DU, she is
 19 part of their international studies thing. And I made
 20 the right choice. I mean, because, you know, you get
 21 to argue. See, that's why he loved the class too
 22 because, you know, you get to be verbal, you get to
 23 argue, you get to make your points and try to work
 24 things out in a big group but also in small groups.
 25 And I put this lady on him because I knew

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1 she was -- I could just tell she was pretty good, and
 2 I think he tried to get -- you know, attention seeking
 3 on some things, and I just remember her shutting him
 4 down. And I just watched for his response, and his
 5 response was good. He didn't get angry. He accepted
 6 it. He accepted his criticism. He realized that she
 7 made a pretty good point and basically she shut him
 8 up.

9 **Q. Okay.**

10 A. And it was pretty good. And so I look at
 11 that as evidence of success, and the fact that I
 12 didn't have any other incidents. And there is another
 13 thing too I think was good.

14 **Q. Okay. So, again, that was evidence that**
 15 **your approach of essentially allying with him and**
 16 **getting him engaged was working?**

17 A. Yeah. And, you know, from time to time
 18 in class, I called on him and other people and
 19 whatever and he got to have his air time in an
 20 appropriate way and it was good.

21 **Q. Okay. Do you recall having any**
 22 **discussions with Tracy Murphy or other teachers or any**
 23 **administrators about the fact that in some respects,**
 24 **you had been able to turn this kid from a disruptive**
 25 **force into a positive influence in your class?**

53	<p>1 A. That's a good question. Yeah, that's</p> <p>2 funny. I didn't really think about it. Again,</p> <p>3 they're more like passing things. It wasn't like a</p> <p>4 sit-down -- I can't swear by this, but I think at some</p> <p>5 point, you know, Tracy and I might have bumped into</p> <p>6 each other in the hallways and said something. I</p> <p>7 think I remember, I hope I'm not creating this, but</p> <p>8 maybe a time by the copy room or something and, you</p> <p>9 know, he said, How is it going? And I said, Actually,</p> <p>10 we're doing -- much improved. We were in the hallway</p> <p>11 there. I think we had one of those.</p> <p>12 Q. Okay. And --</p> <p>13 A. But, again, it was one of a passing</p> <p>14 thing.</p> <p>15 Q. Okay.</p> <p>16 A. You know, he was in my class, I wasn't</p> <p>17 having any problems, so I was happy.</p> <p>18 Q. Now, when Karl got back to class and you</p> <p>19 adopted this new approach with him, I guess one,</p> <p>20 again, chronological question, at some point during</p> <p>21 that same time period, did you become aware that Karl</p> <p>22 had threatened to kill Tracy?</p> <p>23 A. I don't think so. I don't remember</p> <p>24 hearing really anything of that. As far as I was</p> <p>25 concerned, I was moving forward.</p>	55
54	<p>1 Q. When did you first learn, as best as you</p> <p>2 can remember, that Karl Pierson had threatened to kill</p> <p>3 Tracy Murphy? Was it before or after the shooting?</p> <p>4 A. I think it was after the shooting.</p> <p>5 Q. After?</p> <p>6 A. Yeah.</p> <p>7 Q. Okay. And in looking at your FBI</p> <p>8 statement, there's another incident that is described</p> <p>9 with this freshman girl?</p> <p>10 A. Yes.</p> <p>11 Q. And, again, it reads as though this was</p> <p>12 an incident that further demonstrated that your</p> <p>13 approach to Karl Pierson was working, right?</p> <p>14 A. Yes.</p> <p>15 Q. So --</p> <p>16 A. I didn't read it, but I remember it.</p> <p>17 Q. Sure. It's on page 1001. Feel free to</p> <p>18 take a look at that, and then I just want to get you</p> <p>19 to tell me what you recall about that incident</p> <p>20 A. Yeah, I mean, it's not a hundred percent</p> <p>21 correct. I just remember it was in class, and I don't</p> <p>22 remember what she said, but I remember going, Oh, boy,</p> <p>23 here we go again. And I was just waiting for the</p> <p>24 other shoe to drop, and it didn't. He didn't say a</p> <p>25 thing, we just kept moving on and it was fine. And I</p>	56
	<p>1 was like, great.</p> <p>2 And I broke them up into groups or</p> <p>3 whatever, and so remember it was -- it was in the</p> <p>4 middle of class, not after class, because I said, Hey,</p> <p>5 Karl, meet me outside for a sec. And, again, it was</p> <p>6 kind of like that look of Oh, crud. I could sense he</p> <p>7 was always in trouble, and so he felt like he was in</p> <p>8 trouble again.</p> <p>9 And I -- all I did was say thank you, and</p> <p>10 I shook his hand. And he was a little confused. And</p> <p>11 he goes, Why? And I just said, Listen, I know when</p> <p>12 that happened out there, you probably thought of 10 or</p> <p>13 12 things that you could have said. And, in fact, I</p> <p>14 said, I myself, thought of five. But I didn't say it,</p> <p>15 and you didn't say it, good job. And that's it. And</p> <p>16 I just walked back in the classroom.</p> <p>17 Q. Okay. And what was his demeanor or</p> <p>18 reaction when you essentially complimented him for not</p> <p>19 going off on this girl?</p> <p>20 A. Yeah, good question. I think it was just</p> <p>21 kind of a -- I can't do that for the record, but it</p> <p>22 was --</p> <p>23 Q. So smug?</p> <p>24 A. -- like a smile. But I didn't sit there</p> <p>25 and stare at him. I know not to do that. You just do</p>	
	<p>1 it and move on. So that's what I did. I did it and</p> <p>2 went back in the room.</p> <p>3 Q. Now, going back in time to when this girl</p> <p>4 said whatever it was that you thought might trigger a</p> <p>5 response from Karl, were you watching his demeanor at</p> <p>6 that point?</p> <p>7 A. No. No. No. I was thinking about it,</p> <p>8 but I don't think that would have been good if I would</p> <p>9 have stared at him, because that would have elicited</p> <p>10 it. If I had done that, it would have been baiting</p> <p>11 him or something.</p> <p>12 Q. Sure. And the reason I'm asking is in</p> <p>13 the FBI statement it says, "Corson watched Pierson and</p> <p>14 noticed he restrained himself from berating her."</p> <p>15 A. Yeah.</p> <p>16 Q. And I'm wondering what you observed, if</p> <p>17 anything?</p> <p>18 A. I honestly don't remember if my</p> <p>19 observations were visual or auditory. You know what I</p> <p>20 mean? I just remember kind of like, Oh, something is</p> <p>21 going to happen. I mean, I may have given a passing</p> <p>22 glance, but I think what I meant there is essentially</p> <p>23 -- well, what I said. I'm waiting for the other shoe</p> <p>24 to drop, and it didn't drop.</p> <p>25 Q. Sure.</p>	

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1 A. So I may have looked at him, but I
 2 definitely wouldn't have mad dogged him or stared at
 3 him or anything like that. Nothing happened, and I
 4 didn't want anything to happen, so I just kept flying.
 5 **Q. Okay.**
 6 A. But I did make a mental note, Hey, I'm
 7 going to -- you know, I'm going to reward a good
 8 thing.
 9 **Q. Sure.**
 10 A. Catch him doing something good kind of
 11 thing.
 12 **Q. And were there any other -- are there**
 13 **especially good or especially concerning incidents in**
 14 **your class involving Karl at any time that semester?**
 15 A. No. Those were -- those were the big
 16 things. There really wasn't a lot of stuff. Like I
 17 said, he was a mouthy guy. He liked it because he got
 18 to do the simulations. You know, we did several
 19 simulations. And he was an active guy. I don't know
 20 when I heard later that, you know, he was doing bad in
 21 other classes, probably when I talked to his dad, but
 22 he did fine. You know, probably in part because of --
 23 you know, it was an elective and the structure of it.
 24 And so I really don't have many problems.
 25 Oh, I do remember one thing. We had -- I

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1 think I had a guest speaker. And I do remember him
 2 not being there, and it was kind of a bummer because
 3 he was usually there. And it was a -- I don't even
 4 remember what the speaker was, but I remember catching
 5 him in the, you know, cafeteria area out there. And
 6 catching him walk in that day, so I'm like, Whoa,
 7 Dude, you ditched my class. And so he came up with a
 8 friend, and I confronted him on that. And I said,
 9 Hey, what happened? You know, not going after him,
 10 but confronting the reality of the situation. And he
 11 kind of laughed it off, and he just said, I'm sorry, I
 12 -- and I don't remember what he said. It was a lame
 13 excuse, whatever it was.
 14 I think he had -- he may have even gone
 15 to Brad's class for something. He made it sound very
 16 academic, but I don't know if that was true or not.
 17 He made it sound like it was some reason, and I didn't
 18 necessarily believe it a hundred percent, but I just
 19 confronted him with the situation, Hey, I know that
 20 you missed class today. And he was, you know,
 21 marginally apologetic. He didn't have an attitude
 22 like that, but he wasn't a hundred percent remorseful.
 23 He was kind of, Oh, yeah, sorry. One of those, and I
 24 just remember that.
 25 **Q. Do you recall how close in time that was**

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1 **to the shooting?**
 2 A. I don't, but if I were to venture a
 3 guess, I would say, you know, it was past halfway
 4 through the semester definitely.
 5 **Q. Okay.**
 6 A. Maybe three-quarters of the way.
 7 **Q. But not for -- go ahead.**
 8 A. Yeah, I couldn't give you a date or
 9 anything like that.
 10 **Q. Okay. You've mentioned that you had a**
 11 **conversation with Karl's father at parent-teacher**
 12 **conferences?**
 13 A. Yep.
 14 **Q. Tell us about that.**
 15 A. So I remember him coming up to my table
 16 and, you know, they're supposed to -- there's a big
 17 line and a table like this and they come up. And I
 18 seemed to sense -- this is my recollection, is he was
 19 kind of exasperated too like he came there -- and I do
 20 remember he had a grade sheet. And I think from his
 21 exasperated look, I mean, before we even said
 22 anything, I was like, Whoa, how's it going tonight?
 23 And he had written on his grade sheet and underlined
 24 some stuff and he's like, Well, let me tell you how
 25 it's going. He was kind of upset.

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1 **Q. What did he tell you?**
 2 A. He kind of showed me -- he's like, Look
 3 at this. I don't remember the details, but I know
 4 they were all like D's and F's. They were all bad
 5 grades. And he was getting, you know, pretty upset.
 6 And at that point I go, Well, I don't know about all
 7 of that, but I have some pretty good news for you in
 8 my class, he's doing really well. I don't know if I
 9 mentioned the time that I know that he was gone, that
 10 he ditched, but I just said, I think this is material
 11 that Karl really likes. And, you know, he was
 12 basically like, Well, yeah, he does really good on
 13 things that he likes kind of stuff. And I just said,
 14 Well, you know, we had an incident at the beginning of
 15 year, but since then, he climbed on board and we're
 16 doing great. And he basically said something to the
 17 effect of, Well, this is the one good example on a
 18 very bad day or whatever, you know, bad semester.
 19 **Q. Okay. Did you have -- how long was your**
 20 **conversation with Mr. Pierson?**
 21 A. Pretty average, I would say. You know,
 22 how so you're supposed to be there under three to five
 23 minutes or something like that. I think he was
 24 probably around that. I think it ended by, Well, I've
 25 got to go talk to so-and-so. He kind of rolled his

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1 eyes and drug himself off.

2 **Q. Did you have any discussion with him**

3 **about what, if anything, he was doing to try to help**

4 **Karl get through this?**

5 A. I don't remember him saying anything

6 about -- it was more of a negative conversation than a

7 positive conversation. Not negative between him and

8 me.

9 **Q. Sure.**

10 A. You know, he was happy with the one piece

11 of news I had, but it was more like, I don't know what

12 happened. You know, it was like, you know, He was so

13 smart, I don't know what happened. It had that feel

14 to it.

15 **Q. Did it concern you to learn that Karl was**

16 **getting D's and F's in every class other than yours?**

17 A. I don't think it overly concerned me. I

18 think by this point what I had formulated about Karl

19 was that, you know, he had some tools, but he wasn't

20 really using them to the extent of his ability. I

21 knew he could do that in my class, because I didn't

22 require him to write a bunch of five-page papers or

23 anything like that. I have a feeling if I did, he

24 probably would be getting D's in there, but like I

25 said, my class was an elective. It was based on

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1 participation and thinking and attendance. And he was

2 doing those things rather well. So it kind of made

3 sense in my mind. It may have alarmed me a little

4 bit, but I didn't know what happened there, so I

5 couldn't speculate.

6 **Q. Okay. After Karl's father came in for**

7 **parent-teacher conferences, did you have any other**

8 **discussions with any of the administrators about that**

9 **conversation or about his grades?**

10 A. No. No.

11 **Q. I've heard -- and I'm going to switch**

12 **gears now. I've heard from some witnesses that after**

13 **the shooting, teachers, faculty members,**

14 **administrators have been discouraged from talking**

15 **about what happened. And my question is, has that**

16 **been your experience as well?**

17 MR. NATHAN: I'll object to the prefatory

18 part of the question. You may answer.

19 A. Can you do that again? Sorry.

20 **Q. (BY MR. ROCHE) Sure.**

21 MR. NATHAN: He made a statement at the

22 beginning, and then he asked the question. I objected

23 to the statement at the beginning because I don't know

24 whether it is true or not.

25 MR. ROCHE: Sure.

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1 **Q. (BY MR. ROCHE) And you can still answer.**

2 A. Okay. Can you ask the question again?

3 **Q. Sure.**

4 A. I don't remember what I'm supposed to

5 answer.

6 **Q. That's understandable. If you haven't**

7 **been through a deposition, it's kind of a bizarre**

8 **experience. My question is -- well, let me break it**

9 **into parts. My prefatory statement is, I've heard**

10 **from other witnesses that they have been discouraged**

11 **from talking about the incidents leading up to and**

12 **that occurred on December 13. And my question is,**

13 **have you had that same experience or feeling that**

14 **you've been discouraged from talking about what**

15 **happened?**

16 A. No, no one has discouraged me from saying

17 anything. In fact, I gave, you know, a ton of these.

18 I was whisked away at the beginning in a special car,

19 as was a lot of my class. Now, this is not

20 international relations class. I'm teaching a

21 different class in a different part of the building

22 when the shooting took place, and we were pretty near

23 the library. And we saw someone run by. Actually, I

24 was outside the door, and I saw someone run by, I saw

25 his back. And a bunch of my class could see that as

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1 well. So in the craziness afterwards, we thought that

2 that may have been somebody fleeing, like the shooter

3 fleeing or something like that. And so they sent us,

4 and we gave a million of these things. And no one has

5 ever said anything to me about not saying anything.

6 **Q. And my last question to you is the same**

7 **question that I'm frankly asking every witness, which**

8 **is since you are in the building every day, what do**

9 **you think can be done to improve school safety and to**

10 **help prevent tragedies like this from happening? What**

11 **tools do you need as a teacher that you don't**

12 **currently have?**

13 A. Well, I guess my general feelings are

14 more -- or my feelings are more kind of big picture in

15 general. So I guess -- and this is my personal

16 feeling. But my personal feeling is I, you know,

17 lived in Los Angeles for a long time. I'm done with

18 the guns. You know, I'm done with the guns. And I'm

19 particularly, you know, done with -- you know,

20 particularly people that have, you know, mental

21 illness or that background, I just think it's a very,

22 very bad combination. So it's more of a bigger

23 picture thing, because I just don't know what you can

24 do.

25 I mean, a kid can turn 18, and, you know,

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1 it was told to me by someone afterwards that Karl
 2 turned 18, and he just wanted to do all of these
 3 things he wanted to do. He went and got cigarettes
 4 because he could. He went and got, you know, whatever
 5 things he wanted because he could. He got a gun, you
 6 know what I mean? It was just kind of that, I'm going
 7 to -- and so I just think societally, you know, we're
 8 putting everybody in jeopardy, whether it be a school
 9 or it be somewhere else.

10 I just think it's a bad combination, and
 11 I'm particularly concerned about -- you know, you look
 12 at Sandy Hook, you look at all of these things and the
 13 combination of, you know, complete availability of
 14 guns and really no restraints, particularly for mental
 15 illnesses, and I don't know that Karl qualified on
 16 that anyway, but, you know, I think it's a huge
 17 problem.

18 And so I don't know -- I mean, I felt
 19 like, you know, after the shooting, our school has
 20 done quite a bit, actually. You know, I read all of
 21 those things in the paper about they haven't done
 22 anything, that wasn't my experience at all. They have
 23 it locked down. They have two separate entrances. I
 24 mean, you know, they've closed down -- you know, all
 25 of the kids were mad, they can't go out here and use

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1 all of these other doors to go across the street
 2 during certain times. And they were upset about it
 3 for five minutes, and then they learned to adapt. And
 4 then the next year when the new kids came into that,
 5 they adapted well.

6 So I know they've done that. I mean, I
 7 taught at another school before this one, there was
 8 like 43 doors, and it was like crazy. Relative to
 9 that school, this school is like -- you know, they
 10 locked it down and said, Hey, we're going to make a
 11 plan and they've done that. Are there more things? I
 12 don't know. I don't know. I don't know the answer.
 13 Obviously, if I had the answer, I probably wouldn't be
 14 doing this.

15 **Q. Sure. I appreciate it.**
 16 A. Does that make sense? I think it's hard
 17 to solve this problem without a larger problem being
 18 solved. I mean, that's -- I don't know what you do.
 19 I don't know what you do.

20 **Q. No, and I appreciate that. And as I say,**
 21 **I'm asking the question about what specific to the**
 22 **schools you think would be helpful because you know a**
 23 **lot more about what is going on in that school than I**
 24 **ever will. And as I said, we're going to end this**
 25 **arbitration with a report and a list of**

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1 **recommendations. And I want the people like you who**
 2 **were candidly doing things right to have the**
 3 **opportunity to make any recommendations that you may**
 4 **have.**

5 A. I did notice too there is a camera in
 6 that -- in my hallway that wasn't there before. And I
 7 know we've -- that gives a certain, you know, sense of
 8 security, but I know that's not, you know, an answer.
 9 I know that in terms of cards, you know, the security
 10 cards and all of that and time, I feel like that is a
 11 good addition. And I know that people don't prop
 12 stuff out, and I remember I came in on a Saturday or
 13 during vacation or something, and I knocked on the
 14 door. I could tell the cheerleading squad was
 15 practicing out there, you know, was in there. And
 16 something happened, I don't know if I didn't have my
 17 key or the code wouldn't work, and the kids in there
 18 -- and one of kids came up and they knew who it was,
 19 and they would not open it for me. And I thought,
 20 That's good. That's the right thing. So I definitely
 21 know there has been a mindset change just because of
 22 the experience. I feel that. I know that.

23 **Q. Okay. So there has been a cultural**
 24 **change to a greater focus on school security since the**
 25 **shooting at Arapahoe?**

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1 A. Yeah, I think so.

2 **Q. Why don't we take two minutes, but I**
 3 **don't think I have any other questions.**

4 MR. ROCHE: So let's go off the record
 5 for just a second.
 6 (Recess taken, 11:17 a.m. to 11:22 a.m.)
 7 MR. ROCHE: Mr. Corson, I don't have any
 8 other questions of you. Thank you again for coming in
 9 and telling us what you know.

10 THE DEPONENT: You're welcome.
 11 MR. NATHAN: I have no questions.
 12 MR. EVERALL: We don't have any.

13 WHEREUPON, the within proceedings were
 14 concluded at the approximate hour of 11:22 a.m. on the
 15 21st day of July, 2015.
 16 * * * * *

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I, JEFFREY G. CORSON, 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

JEFFREY G. CORSON

The signature above of JEFFREY G. CORSON 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. 7/21/15 (am)

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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 JEFFREY G. CORSON 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 5th day of August, 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

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CITY AND COUNTY OF DENVER)

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My commission expires September 24, 2016.

Reading and signing was requested.

Reading and signing was waived.

Reading and signing was not required.



Ashley D. Mahe
Registered Professional Reporter

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