

1 JAG NO: 2015-0665A

2 DEPOSITION OF: SCOTT D. MURPHY - November 11, 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 SCOTT D. MURPHY was taken on behalf of the Claimants
14 at 950 17th Street, Suite 2400, Denver, Colorado
15 80202, on November 11, 2015, at 10:19 a.m., before
16 Ashley D. Mahe, Registered Professional Reporter and
17 Notary Public within Colorado.

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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

Also Present:
 Michael Davis
 Desiree Davis
 Carol Lembke
 William Woodward
 Brian Ewert
 Michael Jones
 Linda Kanan
 Connie Bouwman

4

1 WHEREUPON, the following proceedings were
 2 taken pursuant to the Colorado Rules of Civil
 3 Procedure.
 4 * * * * *
 5 SCOTT D. MURPHY,
 6 having been first duly sworn to state the whole truth,
 7 testified as follows:
 8 EXAMINATION
 9 BY MR. ROCHE:
 10 Q. Mr. Murphy, you and I obviously know each
 11 other. I appreciate you coming in for your deposition
 12 today, and I want to start by first and foremost
 13 thanking you for supporting this arbitration during, I
 14 think, what were probably the waning days of your
 15 position as a superintendent at the Littleton Public
 16 Schools.
 17 A. You're very welcome. Thank you.
 18 Q. As you know, this is important on a
 19 number of levels. We're going to walk through some of
 20 those, but we really do appreciate your support. A
 21 couple of rules of the road. I don't know -- first
 22 off, have you been deposed before?
 23 A. Twice.
 24 Q. Okay. So you know some of these rules,
 25 but I like to just refresh people on them at every

5

1 deposition. The first is you've met Ashley. Ashley
 2 is going to be taking down everything that I say,
 3 everything that you say, everything that anybody else
 4 in the room happens to say during the course of the
 5 day. So it's important that we not talk over one
 6 another. Okay?
 7 A. Talk over one another?
 8 Q. Speak at the same time.
 9 A. Oh, I see. Okay.
 10 Q. Another important thing to bear in mind
 11 is to speak up, because we've got a lot of people in
 12 the room and everybody is going to want to hear what
 13 you have to say. Okay?
 14 A. Yes.
 15 Q. And another important rule is because
 16 Ashley is taking everything down, we need your
 17 responses to be verbal, not head shakes or uh-huhs or
 18 huh-uhs.
 19 A. Obviously.
 20 Q. Okay. A couple others. This is not
 21 meant to be an endurance test, and I don't want that
 22 to be how the deposition proceeds today. So if there
 23 comes a time when you want to take a break, even if it
 24 is five minutes after the last break, just tell me,
 25 and we'll take that break. All right?

6

1 A. Okay. Thank you.
 2 Q. And then, finally, I always save the most
 3 important rule for last, which is there will come a
 4 time during this deposition when I ask a question that
 5 doesn't make sense to you. And when that happens, and
 6 it will, will you let me know so I can try to fix the
 7 question?
 8 A. Sure, I will be glad to.
 9 Q. Thank you. I appreciate that. As I
 10 mentioned, we do appreciate your support of this
 11 arbitration as superintendent, and I know you
 12 understand this, but I like to just refresh everybody
 13 on this. This arbitration has a couple of purposes.
 14 One is to examine what happened and didn't happen
 15 leading up to the shooting that occurred at Arapahoe
 16 High School on December 13, 2013. Another purpose of
 17 this arbitration is to look at what has happened since
 18 then and what improvements can be made to help prevent
 19 that kind of tragedy from happening again. Do you
 20 understand that?
 21 A. Yes.
 22 Q. And is that also your understanding and
 23 purpose for being here today?
 24 A. Yes.
 25 Q. Great. With that, let's jump into it.

7

1 How long were you the superintendent at Littleton
 2 Public Schools?
 3 A. Nine years. I began in 2006.
 4 Q. And then retired in the summer of 2015,
 5 as I understand it?
 6 A. Yes.
 7 Q. How is retirement going?
 8 A. It's a learning experience.
 9 Q. Everything is. And in your capacity as
 10 superintendent at Littleton Public Schools, what were
 11 your primary responsibilities?
 12 A. I was responsible for, I would say, the
 13 operations of the school district from normal
 14 operations like school buses and grounds, to helping
 15 lead the instructional program. Just about everything
 16 I can think of when a child comes to school, from the
 17 ages of preschool to the age of 21, for our disabled
 18 students.
 19 Q. All right. And were you also responsible
 20 for budgeting, finance, and things like that?
 21 A. Yes, I was.
 22 Q. And what about any responsibilities
 23 relating to school security and school safety? Can
 24 you speak to that a little bit?
 25 A. Again, I was over all aspects of the

8

1 district. So security would be one of those, which
 2 resided in the facilities department under the
 3 assistant superintendent of business services and
 4 operations.
 5 Q. And who was the assistant superintendent
 6 with that responsibility?
 7 A. Diane Doney.
 8 Q. And that's during that 2013 time frame?
 9 A. Right.
 10 Q. And then you also had a director of
 11 security as well?
 12 A. Yes, we did.
 13 Q. And that was Guy Grace?
 14 A. Yes.
 15 Q. As far as I know, still is?
 16 A. As far as I know, still is.
 17 Q. And what about any human resources or
 18 personnel responsibility? Explain to me what your
 19 role was in that.
 20 A. There's a difference between my direct
 21 role and my role as superintendent. But my role as
 22 superintendent is the assistant superintendent of
 23 human resources reported to me.
 24 Q. All right. And who was the assistant
 25 superintendant of human resources in the 2013, early

9

1 **2014 time frame?**
 2 A. Lori Kinney.
 3 **Q. Lori Kinney?**
 4 A. Kinney, K-i-n-n-e-y.
 5 **Q. Okay. That's why I was confused. All**
 6 **right. And what is her role now, if she has one?**
 7 A. She is retired. So she retired, I
 8 believe, the end of 2014.
 9 **Q. And when it came to the hiring and firing**
 10 **of teachers or administrators, would that also find**
 11 **its way to your desk or would she deal with those**
 12 **issues herself?**
 13 A. She would deal with those issues in the
 14 -- well, the administrator that was over those people,
 15 and then the individual affected.
 16 **Q. So would you have to give final approval**
 17 **on a decision to suspend or terminate a teacher or an**
 18 **administrator?**
 19 A. On a practical level, it was always
 20 forwarded for the board's approval. They officially
 21 hire and fire. So the office of human resources,
 22 under the assistant superintendent of human resources
 23 would put all personnel actions on a board agenda,
 24 again, hiring, firing, transfers. And those would go
 25 before the board for their action at a regular board

10

1 meeting.
 2 **Q. All right. And as I understand it, there**
 3 **were no teachers or administrators disciplined or**
 4 **terminated in connection with the events surrounding**
 5 **the shooting at Arapahoe High School; is that right?**
 6 A. As far as I know, that's correct.
 7 **Q. Do you recall whether there was any**
 8 **discussion of whether any LPS faculty or**
 9 **administrators should be the subject of any discipline**
 10 **as a consequence of anything that happened surrounding**
 11 **the shooting on December 13?**
 12 A. I have no recollection of any of that
 13 conversation.
 14 **Q. Okay. Is that something that you think**
 15 **you would remember if it had come up?**
 16 A. Yes.
 17 **Q. So as best as you know, there was no**
 18 **discussion of any thoughts about disciplining or**
 19 **terminating anybody as a consequence of what happened**
 20 **at Arapahoe High School --**
 21 A. No, not that I recall.
 22 **Q. -- two Decembers ago? You've described**
 23 **to me generally what your role was with safety and**
 24 **security. I want to ask now about one particular**
 25 **aspect of safety and security at the Littleton Public**

11

1 **Schools, and that is threat assessments. In your**
 2 **capacity as superintendent, did you ever get involved**
 3 **in the threat assessment process?**
 4 A. No, not until the very end of this tragic
 5 event was I involved and aware of its scopes, so to
 6 speak.
 7 **Q. Well, let me ask you, prior to**
 8 **December 13, 2013, were you even aware that LPS had a**
 9 **threat assessment procedure in place?**
 10 A. Yes.
 11 **Q. All right. And you weren't involved in**
 12 **conducting the threat assessments, I take it?**
 13 A. No.
 14 **Q. Frankly, I wouldn't expect you to be.**
 15 **When a threat assessment was done at one of your**
 16 **schools, were those ever forwarded to you as**
 17 **superintendent?**
 18 A. No, they were not. I could go on a
 19 little bit if you want me to.
 20 **Q. Absolutely. I would love to hear it.**
 21 A. They were not, but the assistant
 22 superintendent of student services, who I believe was
 23 part of the development of the threat assessment
 24 process, and that was Ms. Lucinda Hundley, she and
 25 her, the person who replaced her, Melissa Cooper,

12

1 would typically bring something to me.
 2 I would meet with them every other week.
 3 We would go through a number of, primarily, special ed
 4 issues, and they would bring one or two names, not the
 5 threat assessment, not the threat assessment process,
 6 but, you know, here is an individual we're having some
 7 issues with. Here is some things that we're trying to
 8 do, and here are some of the complications with it.
 9 It was more often a case I might have heard about it
 10 or the board or a parent would call me or something.
 11 Not that a parent called me, but they just wanted me
 12 to be prepared and ask whatever questions I had.
 13 **Q. Well, let's follow up on that. During**
 14 **those biweekly meetings with Lucinda Hundley --**
 15 A. Yes.
 16 **Q. -- or Melissa Cooper or any of those**
 17 **folks, did Karl Pierson's name ever make its way to**
 18 **you prior to the shooting?**
 19 A. No.
 20 **Q. Had you ever heard of Karl Pierson prior**
 21 **to December 13?**
 22 A. No.
 23 **Q. Had you ever spoken to any of the**
 24 **administrators or faculty members about Karl Pierson**
 25 **prior to December 13?**

13

1 A. No.

2 **Q. Had you ever spoken to Mr. or Mrs.**

3 **Pierson prior to December 13?**

4 A. No.

5 **Q. And I understand that prior to 2013,**

6 **there had not been very many threat assessments done**

7 **within LPS. Would the high-level threats or the**

8 **threats -- the threat assessment that led to an**

9 **expulsion request ever be brought to your attention?**

10 A. Yes. And I can explain. But go on.

11 **Q. Please do. That was going to be my next**

12 **question.**

13 A. Typically on a weekly basis, a folder

14 would come down to me from the secretary of -- it

15 wasn't student services, from the woman who worked for

16 her and dealt with -- I can't even remember -- Karen

17 Goodwin. I don't remember her official title. And a

18 folder would come down, and there would be pretty much

19 a standard letter that would be going out to parents.

20 And that would be, more often than not -- that would

21 be suspensions, in house -- I think they called them

22 in-house expulsions, and for the most part, they were

23 for me to sign. Actually, they were always for me to

24 sign in that folder.

25 **Q. All right.**

14

1 A. And I wasn't involved in any way in those

2 proceedings but the official -- I was the official too

3 that needed to sign those so that they were forwarded

4 to their parents or guardian.

5 **Q. All right. But as part of that process,**

6 **you weren't doing any individual review or evaluation**

7 **of the outcome of whatever was being described in the**

8 **letter you were signing?**

9 A. No.

10 **Q. That was just a pro forma thing?**

11 A. Yes.

12 **Q. Understood. Did you, prior to the**

13 **shooting on December 13, have an understanding of what**

14 **the LPS district policy was on who was required to**

15 **participate in a threat assessment?**

16 A. No.

17 **Q. Who would have known that information?**

18 **Who would you have expected to know that information?**

19 A. Nate Thompson, I would have expected.

20 During my term there, that would be the primary

21 individual. Some of the discussions that went on that

22 might have led to something of that type would be in

23 Karen Goodwin and her office. Though I believe the

24 specific threat assessments, and this is my belief,

25 that that was Nate Thompson primarily.

15

1 **Q. All right. Did the district have, during**

2 **your tenure at LPS, a specific policy on who was**

3 **required to receive training on how to perform a**

4 **threat assessment or do you know?**

5 A. I don't recall a specific policy.

6 **Q. Is that an issue that you looked at in**

7 **the wake of the shooting to determine whether or not**

8 **the district had adequate policies relating to the**

9 **training of its personnel on how to perform a threat**

10 **assessment?**

11 A. With regard to any specific policy or

12 where we would go with that, I don't recall a

13 conversation. What I recall more was me personally

14 trying to figure out how the system worked, who was

15 involved, who was supposed to be involved, and because

16 of this event -- excuse me.

17 **Q. It's okay. Like I said, if you need to**

18 **take a break, we can do that.**

19 A. Because of this event, I became more

20 involved in knowing more about the process and frankly

21 how it had unfolded. I didn't have all the pieces,

22 I'm sure. It became known to me that there were

23 specific trainings, and I knew trainings were going

24 on. I did not know enough about them. My

25 understanding is that it was a requirement for

16

1 assistant principals to be at this training. What

2 other individuals beyond that, I had made an

3 assumption that the principal was as well, but I think

4 I'm in error on that.

5 **Q. Well, when and how did you learn that**

6 **neither Natalie Pramenko or Kevin Kolasa had received**

7 **training on the threat assessment process prior to the**

8 **shooting?**

9 A. I did not know that at that time. I had

10 made an assumption that they had.

11 **Q. Understood. And my question was, when**

12 **and how did you learn after the shooting, that neither**

13 **Natalie Pramenko nor Kevin Kolasa had been trained on**

14 **threat assessments?**

15 A. I don't recall, honestly.

16 **Q. But you do recall learning sometime, I**

17 **assume relatively shortly after the shooting, that**

18 **neither of them had been through that training?**

19 A. Not a great deal. I didn't -- I made an

20 assumption that they had been through the training.

21 So I -- to me, that wasn't an issue, though actually I

22 don't know for certain that Kevin or Natalie had not

23 been through that training, but that's -- I wish I

24 had.

25 **Q. Well, you've seen the documents, I**

17

1 **presume, that list out the personnel from Arapahoe**
 2 **High School who had received threat assessment**
 3 **training prior to December 2013, have you not?**
 4 A. No, I haven't seen that.
 5 **Q. Does it surprise you to hear that**
 6 **according to the documents produced by LPS in this**
 7 **arbitration, that neither Natalie Pramenko or Kevin**
 8 **Kolasa had received threat assessment training in the**
 9 **several years before the shooting that occurred in**
 10 **December of 2013?**
 11 A. Surprise? I need to ask a question.
 12 Surprised in that they had not or surprised that there
 13 was no indication that they had?
 14 **Q. Surprised that they had not received any**
 15 **such training.**
 16 A. That would have surprised me.
 17 **Q. Would it have concerned you?**
 18 A. Yes.
 19 **Q. Why?**
 20 A. Well, you need to have someone that knows
 21 what they're doing. I could go on for a long time
 22 about that, but . . .
 23 **Q. No. This is a big subject, because I**
 24 **will represent to you that the records, including**
 25 **documents that were prepared by the district, is in**

18

1 **response to written discovery and the underlying**
 2 **sign-in sheets from those threat assessment training**
 3 **presentations made clear that neither Natalie Pramenko**
 4 **nor Kevin Kolasa ever attended that threat assessment**
 5 **training. So if that's a concern to you as a**
 6 **superintendent or former superintendent at the**
 7 **district, I think it's important to understand all the**
 8 **reasons that gives you concern.**
 9 A. Agreed.
 10 **Q. So go ahead. I would like to hear what**
 11 **the reasons are that caused you concern.**
 12 A. The reason it causes me concern is when
 13 you're responsible for any specific area, you need to
 14 know what it is you're looking for. And that's any
 15 function within the district and if you're responsible
 16 for that area. I had made an assumption that the
 17 principal, the CEO, if you will, of the facility that
 18 involves students, would be at the top of that chain.
 19 But I didn't have enough information on that to know
 20 at the time.
 21 But I understand that now the assistant
 22 principal, or at least one of them in a school at a
 23 high school, and I assume, I don't know for sure, the
 24 middle school would be the same. At the elementary
 25 school, I can't speak to that because most of them do

19

1 not have an assistant principal, and it would be -- I
 2 would only be surmising that a principal would be
 3 there.
 4 **Q. All right. Did you, subsequent to the**
 5 **shooting, implement a districtwide policy that**
 6 **required principals and assistant principals at high**
 7 **schools to receive threat assessment training?**
 8 A. I did not.
 9 **Q. Can I ask why not?**
 10 A. The threat assessment process, as I said,
 11 was under an individual who worked for me or worked
 12 for a person that worked for me. And that would be
 13 their responsibility, much like many of the other
 14 areas in the district that I don't -- that I did not
 15 take care of personally.
 16 **Q. Did you have any discussions with the**
 17 **people below you about whether or not there should be**
 18 **a policy that required principals and assistant**
 19 **principals at high schools to receive threat**
 20 **assessment training?**
 21 A. I don't have any recollection of that.
 22 **Q. So as far as you're aware, at the time**
 23 **that you retired from your position as superintendent**
 24 **of Littleton Public Schools, there was no policy**
 25 **requiring principals and assistant principals at high**

20

1 **schools to receive threat assessment training and no**
 2 **plans to implement such a policy; is that right?**
 3 A. If I could expand on it just a little
 4 bit --
 5 **Q. Of course.**
 6 A. -- because we may or may not be talking
 7 about the same thing. When I think of the word
 8 "policy," I think of a document, something that the
 9 board has approved. So those are policies. Now,
 10 there may have been an internal policy or practice
 11 implemented that said, Here is who we wanted at least.
 12 And I would assume that that would have been in place
 13 if they held these threat assessment trainings. Not
 14 if, when they held these threat assessments. I was
 15 not aware of who was required to be there.
 16 **Q. All right.**
 17 A. So I was -- my point is, I don't
 18 recollect any board approved policies, per se, and I'm
 19 not sure if that's what you're --
 20 **Q. Well, I'm actually asking it on both**
 21 **levels.**
 22 A. Okay.
 23 **Q. So I think it's an important distinction**
 24 **to make, and I appreciate the clarification on the**
 25 **board-approved policies that go into the student**

21

1 **handbook or the staff handbook. That's what you're**
 2 **talking about there, right?**
 3 A. Yes, it can be referenced in there. I'm
 4 talking about the formal policies that are both
 5 online, and we used to have a book of them.
 6 **Q. Right. And I guess I'll ask the same**
 7 **question with respect to the less formal policy,**
 8 **slash, practice related to training on threat**
 9 **assessments. Did that change at all at Littleton**
 10 **Public Schools in the wake of the shooting in December**
 11 **of 2013?**
 12 A. After that shooting?
 13 **Q. Yes.**
 14 A. I don't recall a discussion around that.
 15 **Q. All right. Let's switch to a different**
 16 **subject related to the threat assessment process at**
 17 **Littleton Public Schools. And, again, I'm focused on**
 18 **the time period prior to the shooting. Did LPS have a**
 19 **policy or practice in place for any sort of quality**
 20 **control once a threat assessment was done?**
 21 A. I understand there was.
 22 **Q. Okay. Tell me what you understood to be**
 23 **the quality control review process that occurred with**
 24 **threat assessments prior to the shooting in December**
 25 **of 2013.**

22

1 A. First of all, if I can qualify, my
 2 understanding happened after December 13.
 3 **Q. I understand that.**
 4 A. Okay. Okay. Then based on that, what I
 5 understood to have happened is that when a threat
 6 assessment was done, that was forwarded to the
 7 administration building. What was done at that point,
 8 I'm less familiar with. Other than I know the
 9 individual -- I believe I know the individual that
 10 those were forwarded to --
 11 **Q. And that was Nate Thompson?**
 12 A. -- because he told me that's who it was
 13 forwarded to. If there was another individual prior
 14 to that, I'm not aware of it.
 15 **Q. And have you had any discussions with**
 16 **Nate Thompson about what he did with the threat**
 17 **assessments that were forwarded to him in the**
 18 **pre-December 2013 time frame?**
 19 A. Not that I recall. Let me back up just a
 20 second. Could you say that question again because I
 21 want to make sure I'm responding.
 22 **Q. Sure. What I want to know is what was**
 23 **Nate Thompson supposed to do with the threat**
 24 **assessments that were forwarded to him by the schools**
 25 **in that pre-December 2013 time frame?**

23

1 A. Specifically, I don't know. I know they
 2 came over. I don't know what happened after that
 3 point, whether it was filed, reviewed, discussed. I
 4 don't have a detailed knowledge of that.
 5 **Q. Okay. Well, did you ever, after this**
 6 **shooting, have a discussion with Nate about what he --**
 7 **what his practice was when he got a threat assessment**
 8 **in from one of the schools? Did he just file it? Did**
 9 **he review it? Did he talk to the team members? Did**
 10 **he do anything with those other than put them in a**
 11 **cabinet somewhere?**
 12 A. Yes. I did have a conversation with him
 13 about what happened or just let me know what was going
 14 on once it got to his office.
 15 **Q. What did he tell you he did once one of**
 16 **those threat assessments got to his office?**
 17 A. He told me he reviewed them and if there
 18 were areas of concern, that he would talk to the
 19 respective administrator or the staff that he happened
 20 to know and begin to ask the questions you need to.
 21 And I could only assume that that would vary depending
 22 on what the incident was.
 23 **Q. All right.**
 24 A. But that's an assumption on my part.
 25 **Q. Understood. And we know now that the**

24

1 **threat assessment that was performed on Karl Pierson**
 2 **in September of 2013, never made its way to Nate**
 3 **Thompson before the shooting, right?**
 4 A. That's correct, as far as -- that's
 5 correct.
 6 **Q. And did you have a discussion with**
 7 **Mr. Thompson about that?**
 8 A. Yes.
 9 **Q. Tell me about that conversation.**
 10 A. Well, I talked to him about what was
 11 supposed to have happened with this threat assessment
 12 and what was -- what did he see in the threat
 13 assessment from this terrible incident. And he told
 14 me he had not received it, to which I was shocked. I
 15 asked a few questions about how that was supposed to
 16 proceed, and at that point in time, he briefly
 17 discussed what I had just mentioned, what happens to a
 18 threat assessment. And I asked the question, Why
 19 wouldn't it have come over, who was responsible to do
 20 that. And he talked to me a little bit about that and
 21 he --
 22 **Q. Well, who did he tell you had the**
 23 **responsibility for sending that to him?**
 24 A. A woman named Esther Song, who I'm sure
 25 you -- the school psychologist.

25

1 **Q. All right. Go ahead. Sorry to have**
 2 **interrupted.**
 3 A. Where was I? And once that would have
 4 been sent over, then he would have reviewed it. Now,
 5 what I also understood that happened at that time was
 6 there was some -- there was some lack of clarity about
 7 who did get sent over or not. And so that went on for
 8 a while. I can't remember the amount of time. What I
 9 recall is that there was initial conversation with --
 10 and I don't know how that got to Nate. He referenced
 11 that to me. There may be another individual, but she
 12 believed she had sent it over. And I think that
 13 eventually got sorted out that she owned that, I did
 14 not send it over. I did not talk to her specifically
 15 except on one occasion.
 16 **Q. Okay. Well, and that's something I**
 17 **definitely want to explore. You mentioned that you**
 18 **only spoke to Esther Song on one occasion?**
 19 A. Yes.
 20 **Q. When was that?**
 21 A. After the shooting.
 22 **Q. Okay. How soon after the shooting?**
 23 A. It was that day and the governor was
 24 standing next to me and Karl Pierson's sister was in a
 25 trailer near the incident. I mean, near the command

26

1 center. The sheriff at that time, Grayson Robinson,
 2 they were setting up something. I wasn't sure. There
 3 was some, you know, expressions of sympathy and so on
 4 from everyone and Grayson was explaining. And Esther,
 5 who I had never really spoken to, wasn't really even
 6 sure of her role, and then I learned that she was the
 7 school psychologist. I didn't really know her. And
 8 she asked me at that point, What should I do? And I
 9 gave her a response, Well, go inside and take care of
 10 her. We'll let you know from there. And that was my
 11 -- that's the last time I had spoken with her.
 12 **Q. And that was on the 13th?**
 13 A. That was on the 13th.
 14 **Q. All right. Well, let me ask this, Esther**
 15 **Song obviously played a significant role in the events**
 16 **surrounding the shooting that happened at Arapahoe**
 17 **High School, wouldn't you agree?**
 18 A. Yes.
 19 **Q. And once it became clear what her role**
 20 **was, why didn't you talk to her about her role and any**
 21 **mistakes that she may have made in that role so that**
 22 **you as the superintendent of LPS could learn what**
 23 **there was to learn from this tragedy?**
 24 A. I took my guidance, guidance if you will,
 25 my understanding from Nate Thompson. I asked for a

27

1 threat assessment -- the threat assessment document
 2 itself. I had not seen it. And I -- at that point, I
 3 wasn't even sure how the process unfolded. And so
 4 Nate explained that to me. The conversation would
 5 have been more with Nate or an individual that she
 6 reported to, which I'm not -- there's always a
 7 question, did they report to the principal or the
 8 assistant superintendent of student services. And so
 9 why didn't I -- they were talking to her at that point
 10 in time, and there was an investigation that was
 11 beginning to go on and they wanted to talk to her, and
 12 it was pretty much hands off.
 13 And as I began to learn about the threat
 14 assessment, and this occurred over time, there was the
 15 immediate looking at the threat assessment when they
 16 got that for me. I probably didn't see it for several
 17 days, maybe as long as a week, to understand what went
 18 on, how did this occur. And I knew -- I then began to
 19 learn pieces of it, but I think people were still
 20 trying to put the pieces together. And the people who
 21 contacted me directly who were in touch with Esther
 22 were people that would have been involved in it and
 23 knew the most.
 24 **Q. All right. As best as you can recall,**
 25 **when did you first hear that Esther Song had failed to**

28

1 **send this threat assessment over to the district, to**
 2 **Nate Thompson?**
 3 A. Within several days, a day. It may have
 4 -- everything was happening so quickly at that point
 5 in time.
 6 **Q. But within a week or so?**
 7 A. Absolutely.
 8 **Q. Okay.**
 9 A. Yeah.
 10 **Q. And that was, you would agree, a mistake,**
 11 **wasn't it?**
 12 A. Not sending it over?
 13 **Q. Yes.**
 14 A. Yes.
 15 **Q. Once you learned of that mistake, who did**
 16 **you tell about that mistake?**
 17 A. I don't recall. What I do recall is it
 18 became known to my team and there was a discussion. I
 19 don't remember all of the elements or questions about
 20 this and some did not know that process as well. But
 21 everyone knew about it at that time. I don't recall
 22 who I -- frankly, I know there was a -- I don't recall
 23 exactly.
 24 **Q. Well, let me ask it this way. It sounds**
 25 **like within a week or so you and your team knew that**

29

1 **Esther Song had made this mistake with the handling of**
 2 **the threat assessment, right?**
 3 A. We knew that -- yes, what we knew is that
 4 she hadn't sent it over.
 5 **Q. Right. And that was a mistake?**
 6 A. Or that we were told that she hadn't sent
 7 it over, and there was still a little bit of confusion
 8 on my part for some time. Did she or did she not.
 9 And it was -- I was hearing two stories. One from the
 10 media staff that sat with me that she did not, and
 11 there was apparently some conversation with someone,
 12 Yes, I did or she thought she did.
 13 **Q. Who is this someone that thought that the**
 14 **threat assessment had been sent over?**
 15 A. My understanding it was Esther talking
 16 with Nate. It may not have been. It may have been
 17 another individual.
 18 **Q. Well, once it became --**
 19 A. And somewhere Kevin was involved in that.
 20 **Q. But once it became clear to you that the**
 21 **threat assessment had not been sent over to the**
 22 **district, who did you tell, or who did you direct your**
 23 **staff to tell that piece of information, if anyone?**
 24 A. I don't recall. Me certainly. I'm the
 25 CEO of the organization.

30

1 **Q. Understood. And one --**
 2 A. And I'm sure --
 3 **Q. Go ahead.**
 4 A. Oh, I'm certain that as an investigation
 5 was unfolding, that was going to come out quite
 6 clearly.
 7 **Q. And that's part of where I'm going with**
 8 **this. Because what has become clear is Littleton**
 9 **Public Schools did not release that information**
 10 **publicly, did it?**
 11 A. I don't remember it being released
 12 publicly in the sense that it would have gone to some
 13 public body, other than the sheriff's office.
 14 **Q. Well, and it wasn't something that was**
 15 **disclosed to the sheriff's office either, was it?**
 16 A. That, I don't know. I assumed it was.
 17 **Q. Well, did you direct somebody on your**
 18 **staff to tell the sheriff's office, Hey, here is**
 19 **something we missed. We should have gotten this at**
 20 **the district office and we didn't, because I don't see**
 21 **that anywhere in the 4,000 pages that the sheriff**
 22 **released.**
 23 A. I don't recall.
 24 **Q. And you didn't release it to the parents**
 25 **of students who were in the building when that**

31

1 **shooting occurred either, did you?**
 2 A. I did not.
 3 **Q. And you didn't direct anyone to do that**
 4 **either, did you?**
 5 A. No, I did not.
 6 **Q. And you didn't tell the Davises, Hey,**
 7 **guess what, this is a mistake that was made at the**
 8 **district. We're terribly sorry?**
 9 A. No, I did not.
 10 **Q. The first we heard of that was in Esther**
 11 **Song's deposition about a month ago. Does that seem**
 12 **right to you?**
 13 A. No. I assumed it was with the sheriff's
 14 report itself as it was unfolding. I was never
 15 entirely certain of which one was the truth. Nate, I
 16 had worked with. Esther, I didn't know, but I
 17 certainly wanted to know was it or was it not. And I
 18 assumed the sheriff wanted the same thing.
 19 **Q. That was a fairly long tangent we took.**
 20 **I want to go back to the quality assurance or quality**
 21 **control that's done on threat assessments. Did you**
 22 **make any changes after learning what you learned about**
 23 **this threat assessment with respect to how the quality**
 24 **control process is done on those?**
 25 A. I did not make changes --

32

1 **Q. Did you direct --**
 2 A. -- myself.
 3 **Q. Did you direct anybody on your staff to**
 4 **make any changes to the quality control process for**
 5 **threat assessments?**
 6 A. I asked my staff to take a look at this
 7 and to involve the people that were necessary, all of
 8 whom I did not know, does this process make sense, was
 9 it -- it appeared from all -- from what I could see,
 10 now this is just a non-fish -- a non -- an individual
 11 who doesn't do this regularly that it covered many,
 12 many things. But I was not the expert in this, and I
 13 said, you know, Can we get someone together? So I
 14 asked my deputy superintendent, and that's Connie
 15 Bouwman, if she could work with Nate and her staff to
 16 have this looked at.
 17 **Q. All right. And what was the outcome of**
 18 **that, if you recall?**
 19 A. The outcome of that is -- that they
 20 received -- I received an update and the answer was,
 21 yes, they would do that. I received an update on that
 22 verbally that they were going to do that and they were
 23 in the process of putting that together. I asked for
 24 something specific that I could get a feel for what it
 25 is in the process itself in the forms, anything that I

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1 could put my handle on that should be improved.
 2 **Q. And as a consequence of that, there were**
 3 **a number of changes made to how threat assessments are**
 4 **conducted at LPS; is that right?**
 5 A. I don't know all of them.
 6 **Q. And I'm not asking what they are. I'm**
 7 **just asking were there a number of changes made as a**
 8 **consequence of that review that occurred in the summer**
 9 **of 2014?**
 10 A. I don't recall specifically. I know -- I
 11 know conversations I had, and I don't know the status
 12 of this at that time. I had a couple of my own
 13 observations, but . . .
 14 **Q. Well, let's -- I'm very interested to**
 15 **hear those.**
 16 A. Because I was learning at the same time.
 17 **Q. What were your observations?**
 18 A. Why wasn't a parent signature on the
 19 third page about that -- little and tiny spaces. Now,
 20 I learned after that to some extent the threat
 21 assessment was a screening tool as well, but it just
 22 struck me, if you're going to have a parent signature
 23 there, the parents ought to see it. Now, I didn't
 24 know that they did or did not, it just struck me there
 25 wasn't one on there. And so that was one thing.

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1 After the review, there was some
 2 discussion about -- this was the review that was in
 3 the summer that I asked for. There was some
 4 discussion about having greater specificity on what --
 5 on each of the categories that were on there, some
 6 definition. And I don't recall who said this, but it
 7 made some sense to me, though I don't know if they --
 8 the districts implemented it, and that is the notion
 9 of low, medium, and high may not be sufficient as
 10 opposed to a spectrum of say 1 through 10 and where do
 11 they fall. Now, I don't know what the material
 12 difference is, but it tended to make me believe that
 13 made more sense.
 14 **Q. So you wanted --**
 15 A. And I needed -- well, there were a lot of
 16 things I needed to know. What constituted the threat.
 17 I was trying to develop an understanding of how do you
 18 get from A to B? How do you get from reviewing
 19 someone, and then they're a low and then they're a
 20 medium or then they're a high?
 21 **Q. All right.**
 22 A. After that period of time, I began, over
 23 the next year, to learn more and more.
 24 **Q. And you mentioned that you remember more**
 25 **conversations about that review process than you do**

35

1 **the specifics of what was implemented. Tell me about**
 2 **the conversations you had about that review of the**
 3 **threat assessment process.**
 4 A. My conversations that I recall with
 5 Mrs. Bouwman -- and Nate may have been involved in
 6 this, my recollection is less on this -- is that the
 7 process was not bad, but there are some things that
 8 could be sharpened a little bit. And I think I
 9 referenced some of those, better descriptions to help
 10 people.
 11 Another one, there needs to be more
 12 people at the table, and that made absolute sense to
 13 me. I think -- and I think, now I'm recalling, that
 14 that was something that came out of this and that the
 15 right people have to be at the table. Now --
 16 **Q. Who were the right people in your mind?**
 17 A. Whoever was the central coordinator
 18 needed to be there. The person -- and I can't think
 19 of a better word, sort of the vortex. You know, the
 20 center who has called this together, where this
 21 complaint has come. The counselor, the psychologist
 22 that was involved. I'm talking about secondary
 23 schools now.
 24 **Q. Understood.**
 25 A. Certainly the SRO would have been helpful

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1 or at least be knowledgeable of that. And I believe
 2 the teacher maybe where the incident occurs or at
 3 least a teacher that has some familiarity with either
 4 the behavior of this student or another student. And,
 5 you know, I'm a little influenced by the IEP process
 6 in schools, the parent issues that are there. Now,
 7 whether that makes sense on that level, I'm beginning
 8 to go outside of my expertise. But it just, on the
 9 surface of it, seemed that way, and certainly several
 10 of them. And I asked questions and that was pretty
 11 much affirmed to me as well.
 12 **Q. All right. Let's go through a couple of**
 13 **documents. We've obviously marked a lot of exhibits,**
 14 **some of which I'm going to refer to with you and some**
 15 **of which are going to be new to the process.**
 16 **(Deposition Exhibit 56 was marked.)**
 17 **Q. Exhibit 56 is a document presented by**
 18 **Colorado Attorney General John Suthers in 2009, and**
 19 **it's titled "Colorado School Violence Prevention and**
 20 **Student Discipline Manual." Do you see that?**
 21 A. Yes.
 22 **Q. And you'll see in the lower right corner**
 23 **there is a number LPS 03265. That is an indication**
 24 **that this is a document I received from Littleton**
 25 **Public Schools as part of this arbitration. My first**

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1 question is, do you recognize this document and have
 2 you seen it before?
 3 A. I believe I have.
 4 Q. All right. Are you generally familiar
 5 with what this document is and what it is intended to
 6 do?
 7 A. In a very, very general way.
 8 Q. All right. And I should have mentioned
 9 this at the outset of the deposition. I'm not going
 10 to be asking you a bunch of trick questions or gotcha
 11 questions. I'm just trying to get a sense of what
 12 your general familiarity is with this document.
 13 A. Sure.
 14 Q. So why don't you explain to me in general
 15 terms what your familiarity is or your understanding
 16 is of this manual on the prevention of school violence
 17 and student discipline.
 18 A. Knowledge and my understanding.
 19 Knowledge -- and I hope I'm quoting this essentially
 20 correct. My knowledge of this is this looks very
 21 familiar to a document that when the team got
 22 together, the team being the one that Ms. Bouwman and
 23 I believe Nate Thompson had with this group. I think
 24 John Nicoletti was on it and some law enforcement
 25 people. I think they were provided, if I recall

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1 correctly, a set of documents, and this looks to me to
 2 be like that. I can't verify for sure, but it looks
 3 like it. The specifics of this, no, I have not read.
 4 Q. Understood. So the reason you're
 5 familiar with this, as you just described, is based on
 6 you believe it was provided to the team that got
 7 together in June of 2014 to review the threat
 8 assessment process?
 9 A. I believe it was. I know there was a set
 10 of documents. It looks familiar.
 11 Q. Do you recall having any familiarity or
 12 any understanding of this document prior to the
 13 shooting that occurred at Arapahoe High School?
 14 A. No. And I did not.
 15 Q. Okay. Well, I'm going to ask you to take
 16 a look at the page that is marked 02373.
 17 A. There's a mark?
 18 Q. Yeah. The lower right-hand corner has
 19 numbers.
 20 A. Oh, I see. It's a sequence.
 21 Q. Yes.
 22 A. Okay.
 23 Q. Are you there?
 24 A. I am.
 25 Q. Great. On this page, Attorney General

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1 Suthers has listed ten concrete steps to developing
 2 safer schools. He references Ron Stephens from The
 3 National School Safety Center. Do you see that?
 4 A. Yes.
 5 Q. Are you familiar with The National School
 6 Safety Center?
 7 A. No, I'm not.
 8 Q. Are you familiar with these ten concrete
 9 steps to developing safer schools?
 10 A. No, I am not.
 11 Q. Well, let's walk through those and just
 12 one by one, I want to ask whether or not Littleton
 13 Public Schools had in place these ten steps. First,
 14 did LPS have a mission statement that included safety
 15 in that statement?
 16 A. You're going to get me here. I can't
 17 remember.
 18 Q. Okay. Did LPS have a safe school plan
 19 that crafted individualized plans for each school in
 20 the district?
 21 A. I believe there was a plan out of
 22 security that would be called at least something
 23 similar to this, but I don't know if it was specific
 24 to each school.
 25 Q. All right. And did LPS have a discipline

40

1 code?
 2 A. I don't recall. There was a code of -- I
 3 believe they called it -- well, it was a student
 4 manual, a code of conduct, and that could be construed
 5 as something similar.
 6 Q. All right. And you'll see the next item
 7 is written agreements. So my question is, did LPS --
 8 and I'm quoting here -- develop written agreements
 9 with other youth-focused agencies such as memorandum
 10 of understanding with law enforcement?
 11 A. I believe there was.
 12 Q. Do you recall when that agreement was
 13 developed and signed? Is it something I've asked for
 14 in this arbitration and I haven't received?
 15 A. You know, I don't recall. And the reason
 16 I'm saying what I did is we had an agreement
 17 memorandum of understanding, if you will, after the
 18 event with the Arapahoe sheriff as law enforcement. I
 19 don't recall one with the City of Littleton, and this
 20 was around providing SRO's and our agreement -- excuse
 21 me.
 22 Q. No, go ahead.
 23 A. Because it said memorandum with law
 24 enforcement. And we hadn't -- so I'm making -- I'm
 25 jumping here, thinking there was probably something

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1 before that, but I don't know for certain. But I know
 2 that the sheriff provided a document. I can't
 3 remember the -- how we proceeded with that, but this
 4 was to begin to both expand the number of SRO's,
 5 Arapahoe High School being the focus at that time, and
 6 to begin paying for it. He was giving a -- he was
 7 having some challenge, I think, from the city council
 8 of Centennial about that, and we agreed to fund half
 9 of the cost.

10 **Q. All right. And I understand, and I have**
 11 **seen as part of this arbitration the agreement between**
 12 **Littleton Public Schools and the Arapahoe County**
 13 **Sheriff's Office related to the hiring and funding of**
 14 **the school resource officers.**

15 A. Yes.

16 **Q. Let me focus the question that's directed**
 17 **at this fourth concrete step from the attorney**
 18 **general's report and ask, did Littleton Public Schools**
 19 **have any kind of interagency information sharing**
 20 **agreement in place prior to the shooting in December**
 21 **of 2013?**

22 A. I believe you're speaking of a written
 23 document?

24 **Q. Yes.**

25 A. I don't recall any. It may have existed

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1 with the people that were responsible. I don't know
 2 of any.

3 **Q. But you're not aware of any such written**
 4 **agreement?**

5 A. No.

6 **Q. Let me direct your attention, and we'll**
 7 **come back to 72, but I want to direct your attention**
 8 **to 7290.**

9 A. 72? I was on 73.

10 **Q. No, I'm sorry. I'm asking you to take a**
 11 **look at page 03290.**

12 A. 90?

13 **Q. 3290, yes.**

14 A. Got it.

15 **Q. All right. In the middle of the page in**
 16 **bold print in the attorney general's report it says,**
 17 **"Written agreements with law enforcement are**
 18 **required," doesn't it?**

19 A. Yes, it does. First sentence.

20 **Q. And it goes on to say, "Each local board**
 21 **of education is required, unless it is not possible,**
 22 **to develop written agreements with local law**
 23 **enforcement officials, the juvenile justice system,**
 24 **and social services departments for the purpose of**
 25 **keeping each school environment safe." And it cites a**

43

1 **Colorado statute, 22-32-109.1 sub (3). Do you see**
 2 **that?**

3 A. Yes.

4 **Q. Did LPS, during your tenure as**
 5 **superintendent, have written agreements with local law**
 6 **enforcement officials, the juvenile justice system,**
 7 **and social services departments for the purpose of**
 8 **keeping each school environment safe?**

9 A. I don't recall one.

10 **Q. Why not?**

11 A. One was never forwarded to me that I
 12 recall. I don't think I ever had one.

13 **Q. Did you ever direct anybody on your staff**
 14 **or anybody working for you to prepare one and send it**
 15 **to Littleton Police, Arapahoe County Sheriffs,**
 16 **Arapahoe/Douglas Mental Health? Any of those agencies**
 17 **that are referenced there?**

18 A. No, I wouldn't -- no, I did not and nor
 19 would I.

20 **Q. Why not?**

21 A. Because, again, we had an assistant
 22 superintendent that was responsible for this, which I
 23 wanted to add one piece if I might.

24 **Q. Yes. Go ahead.**

25 A. The only one that may have, and it's

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1 indirectly if there was one, and I'm not aware of
 2 one --

3 **Q. Keep going.**

4 A. -- was --

5 **Q. You can keep going. I'm just getting**
 6 **coffee.**

7 A. -- with social services potentially. But
 8 I don't know for certain. The reason I know is
 9 because there were issues over time with social
 10 services in the county. And I became familiar with a
 11 term I had never heard before, which was payer of last
 12 resort. I didn't see a document or anything about
 13 that, and so the payer of last resort was as -- as the
 14 funding was cut, as I understand it from the state for
 15 social service -- provision of services for social
 16 service -- for services from the county, we became
 17 obligated in some way to take care of the child. And
 18 most of these were federal requirements, as I recall,
 19 with special ed students or what we had was
 20 emotionally and behaviorally disorder students.
 21 That's where a lot of our issues came from.

22 **Q. But my question to you was, why didn't**
 23 **you direct your staff to -- or somebody to prepare a**
 24 **written information sharing agreement that you could**
 25 **send to the Arapahoe County Sheriff's office or the**

45

1 **Littleton Police Department or any of the other law**
 2 **enforcement agencies whose jurisdictions overlapped**
 3 **with your school district?**
 4 A. I did not because I was not aware of the
 5 statute.
 6 **Q. Okay.**
 7 A. And I would -- frankly, the staff that
 8 works for me in a number of areas follow some of their
 9 requirements, and I don't know why this wasn't
 10 forwarded.
 11 **Q. Okay. Let's go back to page 3273, and I**
 12 **think I did misspeak earlier about what page we were**
 13 **on.**
 14 A. 3273.
 15 **Q. That's the ten concrete steps, right?**
 16 A. Yes. Yes.
 17 **Q. Let's go to the next one. Did LPS have a**
 18 **crisis management policy in 2013?**
 19 A. Not in -- I don't recall one that was
 20 ever -- again, distinguishing between policies, the
 21 board of education policy. I don't recall anything
 22 there. I do recall that there was a practice in
 23 crisis management which was -- I'm trying to think of
 24 the term -- around such things as an active shooter,
 25 how a school is to respond, tabletop exercises, and

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1 the procedures that would go out regarding that.
 2 There was a safety and security manual that was
 3 provided to each school and my office and others.
 4 Under what circumstances and what issues would you --
 5 and how would you respond. What do you need to do.
 6 **Q. All right. The next step in this list of**
 7 **ten concrete steps to developing safer schools calls**
 8 **for annual school safety assessments. Do you see**
 9 **that?**
 10 A. Yes.
 11 **Q. Did Littleton Public Schools under your**
 12 **leadership perform annual school safety assessments?**
 13 A. I don't know of formal ones, and there
 14 may have been. I do know that director of security
 15 would sit down with the principal or in some cases our
 16 assistant superintendent and talk about what do we see
 17 in terms of areas that should be improved or areas of
 18 concern. And that wouldn't be annually. That would
 19 probably be -- that would be one or two things, far
 20 more often where there were issues or when they saw
 21 certain areas that were going well, they would tell
 22 them that it was well. But not -- and I'm only making
 23 an assumption in terms of was there a written
 24 assessment, a formal assessment, and that I don't
 25 recall. In fact, I don't know.

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1 **Q. Would the results of any school safety**
 2 **assessments be provided to your office?**
 3 A. No.
 4 **Q. Who, if you know, would receive the**
 5 **results of those school safety assessments?**
 6 A. That would be the assistant
 7 superintendent of business services operations and in
 8 some cases, maybe all cases, the assistant
 9 superintendent of student services and perhaps the
 10 deputy superintendent of our learning services team.
 11 Where I would receive anything, if anything, would be
 12 verbal that we're having an issue with an
 13 individual --
 14 **Q. All right.**
 15 A. -- or a community if there were one.
 16 **Q. Do you recall any such discussions about**
 17 **school safety assessments related to Arapahoe High**
 18 **School at any time in the several years prior to the**
 19 **shooting?**
 20 A. Yes.
 21 **Q. Tell me about that.**
 22 A. They were -- Arapahoe High School you're
 23 saying?
 24 **Q. Yes.**
 25 A. Doors not being locked, too much access

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1 into the facility.
 2 **Q. And tell me, who were you having those**
 3 **discussions with and when?**
 4 A. Guy Grace was one of them. It was years
 5 earlier.
 6 **Q. All right.**
 7 A. And I -- my understanding, we had -- we
 8 had a principal who was there for a long time, Mr. Ron
 9 Booth, followed by Ms. Natalie Pramenko. Mr. Booth,
 10 my recollection is, had some problems with closing
 11 doors. Not that he didn't do it, that it wasn't --
 12 because of the activities they had, it was difficult
 13 and he didn't do that. Natalie took that much more
 14 seriously, as all the principals did.
 15 **Q. All right. Let me ask you to look -- in**
 16 **the first binder sitting to your left are some of the**
 17 **exhibits that have previously been marked. All right.**
 18 **If you would open to tab 11, if you would, please.**
 19 **And probably about two-thirds of the way through**
 20 **Exhibit 11 is something marked Exhibit B. There you**
 21 **go. And Exhibit B is a January 11, 2013, document.**
 22 **Do you see that?**
 23 A. Yes.
 24 **Q. Have you seen this document before?**
 25 A. I don't recall. I've seen something like

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1 it.

2 **Q. All right. And does this appear to you**

3 **to be a school safety assessment?**

4 A. Yes, it does appear to be that.

5 **Q. At least as it relates to certain**

6 **subjects, right?**

7 A. I would need to read it, but it appears

8 to be that.

9 **Q. All right.**

10 A. It looks like it's around security

11 access.

12 **Q. Do you have any sense, because this**

13 **document isn't addressed to anybody, who may have**

14 **received this in January of 2013?**

15 A. I may have received this. The assistant

16 superintendent at that time may have received that.

17 It looks -- I have a vague memory, but it looks like

18 something one of us or pieces of it I have seen but

19 I --

20 **Q. All right.**

21 A. It's not real clear. If you would give

22 me just a moment.

23 **Q. Of course. Actually, we've been going**

24 **for a while. Why don't we take a five- or ten-minute**

25 **break.**

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1 (Recess taken, 11:28 a.m. to 11:44 a.m.)

2 **Q. (BY MR. ROCHE) Mr. Murphy, during the**

3 **break were you able to take a look at Exhibit B to**

4 **deposition Exhibit 11?**

5 A. Yes. Yes, I did look at it.

6 **Q. And that's the January 11, 2013, document**

7 **relating to school safety?**

8 A. Yes.

9 **Q. All right. Can you tell me whether or**

10 **not you saw this Exhibit B sometime on or around**

11 **January 11 of 2013?**

12 A. I don't recall exactly when, but I

13 believe I've seen this. I recall something similar.

14 **Q. Do you recall having seen this before the**

15 **shooting at Arapahoe High School?**

16 A. Yeah, I think so. Excuse me, I need to

17 speak up. Yes, I think so.

18 **Q. And one of the concerns --**

19 A. I don't remember this piece, this

20 Exhibit C, but the Exhibit B I have a recollection of.

21 **Q. And right now my questions are focused on**

22 **Exhibit B, not Exhibit C. I want to ask you a few**

23 **questions about the discussion of Arapahoe High School**

24 **in this January 11, 2013, document. One of the**

25 **concerns that's mentioned is that the school only has**

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1 **two CSO's. Do you see that?**

2 A. Yes.

3 **Q. And CSO's are campus security officers,**

4 **essentially?**

5 A. Yes, campus supervisors. I never thought

6 of it as security, but yes.

7 **Q. And in December of 2013, there were**

8 **actually three CSO's, right?**

9 A. I honestly don't -- I don't recall.

10 **Q. All right. In this document, there is,**

11 **again, a recommendation -- or strike that. A**

12 **discussion of the fact that the doors to Arapahoe High**

13 **School are unlocked for -- essentially from 5:30 a.m.**

14 **to as late as 9:00 p.m. Do you see that?**

15 A. Yes.

16 **Q. And one of the specific discussions is**

17 **that "Security has noted that the school also manually**

18 **unlocks other doors by Allen wrenching push bars open.**

19 **The school has been asked to avoid this but it**

20 **continues to happen." Do you see that there?**

21 A. Let me see.

22 **Q. In the section titled "Student Egress."**

23 **The very bottom.**

24 A. Yes, I do see that.

25 **Q. Okay. Do you recall having any**

52

1 **discussions with anybody after you saw this document**

2 **about implementing anything to prohibit schools from**

3 **manually unlocking doors by Allen wrenching push bars**

4 **open?**

5 A. No, not specifically.

6 **Q. Do you recall after the shooting whether**

7 **any policies or procedures were put in effect to**

8 **prevent that from happening at Arapahoe High School**

9 **going forward?**

10 A. I recall something around passing times,

11 and the notion that they do need access. But it needs

12 to be certain -- there needs to be a greater

13 restriction, as opposed to what I had heard for a

14 number of years, and I mentioned to the principal from

15 time to time to work with security that doors remained

16 opened and needed to look seriously at what could be

17 done.

18 **Q. All right.**

19 A. He being the former principal.

20 **Q. You're talking about Mr. Booth?**

21 A. What's that? Oh, I thought you said you

22 met Mr. Booth. No. Yes.

23 **Q. All right. And in the recommendations**

24 **section on Arapahoe High School, the first**

25 **recommendation is that "The school should reduce**

53

1 access into the school even further." Do you see
 2 that?
 3 A. Yes.
 4 Q. And the last recommendation in that same
 5 paragraph is, "The practice of the Allen wrenching
 6 doors should be halted." Do you see that?
 7 A. Yes.
 8 Q. Do you know whether or not those
 9 recommendations were implemented in 2013?
 10 A. No, I don't.
 11 Q. Well, you've read the sheriff's report on
 12 this tragedy, right?
 13 A. Yes.
 14 Q. And you're aware that Karl Pierson
 15 entered the school through a door that was supposed to
 16 be locked but wasn't, right?
 17 A. That was my understanding, yes.
 18 Q. When you discovered that Karl Pierson
 19 entered the school through a door that was supposed to
 20 be locked but wasn't, what changes did you order to be
 21 made with respect to those doors?
 22 A. My recollection was first to look at the
 23 door and find out why it was open, what had occurred,
 24 was it truly that it was open, was it propped, did
 25 somebody open it -- at least to the best of people's

54

1 knowledge and the observations that they had.
 2 My second, it was more in terms of a
 3 question, why would it need to be open. I think I had
 4 the answer for the most part of that at certain times
 5 people needed to come in and out of the forum. That
 6 little theater was there, and there were events that
 7 would occur there. But that should -- that I did not
 8 understand why it wouldn't be locked when they don't
 9 need that. And so in terms of orders, I don't think
 10 of giving orders but it's -- I didn't have a full
 11 knowledge of what needed to occur there but that it
 12 should be restricted as well as every other door to
 13 the extent that it is feasible and reasonable to do
 14 so.
 15 Q. Did you give any specific directions to
 16 any specific people about changes you wanted to see
 17 made with respect to whether doors would be Allen
 18 wrenched open?
 19 A. No.
 20 Q. Why not? You had a recommendation from
 21 Guy Grace, your director of security from January
 22 2013. You had a shooting that cost the lives of two
 23 students in December of 2013 where a shooter came
 24 through a door that was one of the doors that could be
 25 Allen wrenched open. Why didn't you ask for that to

55

1 be changed?
 2 A. What I asked for, as I just mentioned,
 3 was that the doors be restricted as much as feasible
 4 and reasonable. All security matters of this type and
 5 recommendations would have been handled by security in
 6 conjunction with the assistant superintendent of
 7 business services in operations.
 8 Q. And I understand that. But the director
 9 of security is saying, We need to stop this. Why
 10 didn't you stop it?
 11 A. I don't know that it wasn't stopped,
 12 other than that event. I don't know how that
 13 unfolded. I typically was not involved at that level.
 14 Q. You were talking about the forum doors,
 15 right? You asked for essentially some investigation
 16 to be done as to whether or not --
 17 A. After the shooting.
 18 Q. After the shooting, you wanted somebody
 19 to look into whether or not it was important to keep
 20 those forum doors open, right?
 21 A. Right.
 22 Q. Is that your understanding of the door
 23 that Karl Pierson came through?
 24 A. That's my understanding, what they call
 25 the north door.

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1 Q. Okay. And you think the north door and
 2 the forum doors are the same doors?
 3 A. I think so. It may be a different name
 4 for them.
 5 Q. Let's go back to page 3273 in the
 6 attorney general's document. The next item on this
 7 ten concrete step list is a crime reporting system.
 8 Did LPS establish a systematic crime reporting process
 9 during your time as superintendent?
 10 A. Yes, in a manner.
 11 Q. All right.
 12 A. Which I could describe if I might.
 13 Q. Please.
 14 A. Early on, and I don't remember if it was
 15 late in my assistant superintendent's role or early
 16 on, I wanted a summary of what was occurring in our
 17 buildings, how many break-ins, you know, what was
 18 really going on. And the director of security
 19 provided me a multipage sheet that he kept track of
 20 break-ins, any incidents that occurred out there, so I
 21 could get a general idea of what was going on at that
 22 time. And I did that early on.
 23 And from that point, he would talk a
 24 little bit about what he was going to do. But he
 25 really wanted -- I was looking for big flags of things

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1 that may be a problem, but for the most part, a lot of
 2 my questions was whether he felt comfortable with what
 3 he was doing, any impediments he felt like he had, but
 4 not a great deal of conversation.
 5 **Q. Okay. And that was a process by which**
 6 **Mr. Grace reported break-ins and the like to you,**
 7 **right?**
 8 A. To me and probably to his -- I assume to
 9 his supervisor as well.
 10 **Q. All right. And was that focused**
 11 **primarily on physical security where there was damage**
 12 **to the property, where people were entering schools**
 13 **when they shouldn't be?**
 14 A. Yes. Windows open. There was more.
 15 **Q. Okay. Did it also focus on crimes that**
 16 **involved injury to a student, fights, things like**
 17 **that?**
 18 A. That, I don't recall. There were other
 19 items.
 20 **Q. What were the other items on the list**
 21 **that you asked Mr. Grace to provide to you?**
 22 A. I didn't ask him what to provide. He was
 23 pretty good at providing just about everything, but if
 24 I could give an example?
 25 **Q. Sure.**

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1 A. A pipe bomb was found on one of our
 2 buildings. They never found out who it was, but I was
 3 pretty surprised to see that kind of thing. Kids
 4 mulling around, trespassing, breaking in, as you said,
 5 goods taken, and some things they observed, others
 6 they did not that subsequently caused us problems.
 7 **Q. All right. Did you have a**
 8 **crime-reporting system or process in place where**
 9 **information about those types of crimes was**
 10 **systematically reported to the relevant law**
 11 **enforcement authorities, as opposed to just internally**
 12 **within the district?**
 13 A. My understanding is, yes, when it went up
 14 to the level. It actually went both directions. If
 15 law enforcement saw something that they were concerned
 16 about, they would pass it on.
 17 **Q. All right.**
 18 A. And vice versa, and if there were
 19 questions, that kind of thing.
 20 **Q. All right. Tell me about this pipe bomb.**
 21 **What school was it?**
 22 A. Arapahoe.
 23 **Q. When was that pipe bomb discovered?**
 24 A. Late in my last role as assistant
 25 superintendent or early on. I don't recall exactly .

59

1 **Q. So several years before the shooting, I**
 2 **take it?**
 3 A. Yes. Yes.
 4 **Q. And was it reported to law enforcement?**
 5 A. Yes.
 6 **Q. Nobody ever was found to be responsible**
 7 **for having placed the pipe bomb?**
 8 A. No. And, actually, what I had been told
 9 is it had been there for years. It was one of those
 10 things, it might have been, I don't know, either a
 11 defunct one or somebody put it up thinking they might
 12 have one or it was just a, We're going to fool you
 13 kind of thing.
 14 **Q. Do you recall where it was found?**
 15 A. No, I don't.
 16 **Q. Do you recall whether the parents or**
 17 **students at the school at the time were notified that**
 18 **the pipe bomb had been found on school property?**
 19 A. No, I don't recall.
 20 **Q. Would it have been your practice to**
 21 **notify the parents and students at the school that a**
 22 **pipe bomb had been found on school property?**
 23 A. I think it would depend on the severity.
 24 This appeared to be something that was not at a level
 25 of severity. There were other incidents we had at

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1 schools from time to time and they didn't go out and
 2 law enforcement was involved and said, This is fine.
 3 (At this time Ms. Davis left the room.)
 4 **Q. Well, let me ask it a different way. At**
 5 **any time during your tenure as superintendent, did you**
 6 **ever provide a notification to the parents of a school**
 7 **that there was a threat directed at the school?**
 8 A. Yes.
 9 **Q. Give me an example of where that**
 10 **occurred.**
 11 A. This would be -- and we may not be
 12 speaking of the same thing. But a threat to the
 13 school would be a threat to children, in my mind. A
 14 threat to children would be someone who is trying to
 15 pick up children. Potentially a molester or
 16 pedophile, and that would go out for all to be aware
 17 of and that law enforcement was looking at it and
 18 investigating it, Please be aware if you see anything
 19 to let us know.
 20 **Q. All right. Do you recall ever notifying**
 21 **the parent community that one student had made a**
 22 **threat of targeted violence against a particular**
 23 **school or against particular people at a school?**
 24 (At this time Ms. Lembke left the room.)
 25 A. I'm trying to think. Right offhand, I

61

1 don't recall.

2 **Q. Let's keep plowing through the ten**

3 **concrete steps to developing safer schools. The next**

4 **item on the list is, "Custodial control over school**

5 **property." Did LPS have a practice of exercising full**

6 **custodial responsibility over school and school**

7 **property?**

8 A. Can I go back to the last question?

9 **Q. Of course.**

10 A. I don't know when, but I do recall some

11 now.

12 **Q. Okay.**

13 A. What the type of incident was, a threat

14 to the school.

15 **Q. Okay.**

16 A. My immediate memory is Littleton High

17 School where a call would come in and -- We're going

18 to blow up the school or they might say at 1 o'clock

19 today. And we would evacuate the school. We would

20 contact law enforcement, our security would be

21 notified, of course, right away. The principal

22 would -- if they knew about it, they would obviously

23 get security, and they get police involved and their

24 SRO's and the school would be evacuated. I remember

25 that at Littleton High School, at least once, maybe

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1 twice. And they would bring -- they would do what

2 they called sweeps.

3 **Q. All right.**

4 A. And which sometimes they brought dogs in

5 and sometimes that -- I'm sure they did everything.

6 They went through, and then they had people who might

7 know the building, typically custodians, principals

8 would remain in there.

9 **Q. And who would make the decision whether**

10 **or not to notify the parents at a school of, for**

11 **instance, a threat to blow up the school? Was that**

12 **your call or the principal's?**

13 A. Well, certainly it was the principal's,

14 and they -- I usually was told if something -- you

15 know, that something was going out, and I might say,

16 Perfect, that's what we ought to do. This is going to

17 get out fast and people are going to be worried and

18 they need to be able to make some decisions for

19 themselves or ask questions.

20 **Q. And that's a great example, because it's**

21 **one that I was going to ask you about. Very shortly**

22 **after the shooting, there was a threat to blow up**

23 **Arapahoe High School, wasn't there?**

24 A. I don't recall.

25 **Q. There was a young man from, it turned**

63

1 **out, Detroit, who called the school and said, I'm**

2 **going to blow up the school tomorrow; isn't that**

3 **right?**

4 A. I don't recall.

5 **Q. You don't remember that?**

6 A. No.

7 **Q. The young man was arrested a couple days**

8 **after the threat was made. Is this ringing any bells**

9 **at all to you?**

10 A. No.

11 **Q. And the reason I ask is because despite**

12 **that threat and despite the fact that there had just**

13 **been a shooting at the school, no notification went**

14 **out to the parents at Arapahoe High School. And I'm**

15 **very curious as the parent of a student who was at the**

16 **building that day why that didn't happen?**

17 A. I don't know.

18 **Q. Can you shed any light on that?**

19 A. I don't know why it didn't happen.

20 **Q. All right. Let's go back to, "Custodial**

21 **control over school property." When you were**

22 **superintendent, did the school exercise full custodial**

23 **responsibility over school and school property?**

24 A. I'm sorry, I'm going to have to ask for

25 clarification.

64

1 **Q. That is absolutely fair, and I guess I**

2 **will turn it back on you. What do you understand full**

3 **custodial responsibility to mean?**

4 A. My initial reaction was the -- sorry, the

5 custodians who had the care, 11 people to notify, and

6 then I look at the word control, and I don't think

7 that's what it was meaning. I meant -- it means what

8 it says there. If you take out the word custodial,

9 exercise or assume full responsibility over school and

10 school property. Care and well-being of the facility

11 in some way, that's what I think this means.

12 **Q. And did LPS do that within that meaning?**

13 A. I would hope so. Sometimes probably

14 better than others.

15 **Q. All right. Let's talk about the next**

16 **item on the ten concrete steps to developing safer**

17 **schools. "Information sharing" is the next one,**

18 **right?**

19 A. Uh-huh.

20 **Q. And the step that the attorney general**

21 **recommends is, "Share information among schools and**

22 **staff members about dangerous conditions or people."**

23 **Do you see that?**

24 A. Yes.

25 **Q. During your time as superintendent, did**

65

1 **LPS have a policy or practice to share information**
 2 **among schools and staff members about dangerous**
 3 **conditions or people?**
 4 A. In LPS among principals, if there was a
 5 pattern at all schools, that principals needed to talk
 6 about and share, because they got together once a
 7 month, or if there was something more serious, which I
 8 can't think of one immediately. I know that they
 9 would always share that information. And then they
 10 would have principal meetings as well.
 11 (At this time Ms. Davis and Ms. Lembke
 12 entered the room.)
 13 **Q. Can you tell me --**
 14 A. More often dangerous conditions or
 15 another thing that they would share would be, again, a
 16 predator or they would share probably locking the
 17 doors. What are you doing about campus security and
 18 the outside? We had some issues on the north side of
 19 Littleton, for instance. Are other people
 20 experiencing potential gang violence were some of the
 21 issues there.
 22 **Q. All right. Well, and I am going to -- I**
 23 **presume you have heard, but I will ask. Have you**
 24 **heard since the shooting that one of the complaints**
 25 **that teachers voiced was that they were not told about**

66

1 **Karl Pierson's threat assessment and whether or not he**
 2 **was a danger to himself or others?**
 3 A. Yes, since that time.
 4 **Q. And wouldn't that complaint fall in this**
 5 **category of a lack of sharing information among**
 6 **schools and staff members about dangerous conditions**
 7 **or people?**
 8 A. I think it's a judgment call on the level
 9 of danger concern. Not to say that Karl Pierson was
 10 not, I'm just saying that there are certainly other
 11 incidents.
 12 **Q. Well, what guidance did Littleton Public**
 13 **Schools provide to its schools and staff members about**
 14 **when to share information among themselves concerning**
 15 **dangerous conditions or people?**
 16 A. My assumption, again, it's an assumption,
 17 would be to consult with someone like Nate Thompson or
 18 at that time, Lucinda Huntley, Melissa Cooper, perhaps
 19 their supervisor, and if they felt it was at a level
 20 that needed to be shared or how serious is this kind
 21 of thing, they had to make a judgment about that and
 22 so probably not every issue, I'm sure.
 23 **Q. And I understand that, and I appreciate**
 24 **that it was a judgment call when and under what**
 25 **circumstances to share information among staff members**

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1 **about dangerous conditions or people. My question**
 2 **though was, what guidance or training did LPS provide**
 3 **to its people on how to exercise that judgment?**
 4 A. That, I do not know.
 5 **Q. And do you know whether LPS had a**
 6 **specific policy or practice in effect during your time**
 7 **leading the district on the sharing of information**
 8 **among schools and staff members about dangerous**
 9 **conditions or people?**
 10 A. Whether there was a policy or practice is
 11 that --
 12 **Q. Yes.**
 13 A. I don't recall one offhand. My guess is
 14 there was at some time, but it may have been
 15 conversational or training consultation.
 16 **Q. All right. And then the final concrete**
 17 **step in this list of ten is, "Screen new and existing**
 18 **employees." Do you see that?**
 19 A. Yes.
 20 **Q. Did LPS have a policy or practice to**
 21 **screen new and existing employees?**
 22 A. Yes.
 23 **Q. And --**
 24 A. New employees.
 25 **Q. Not existing employees?**

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1 A. I'm probably going to need some
 2 clarification. But taking what I read right there,
 3 existing employees, I don't recall unless there was
 4 some issues that may have come up. New employees, I
 5 knew there is fingerprinting when they came in. It
 6 was, I don't know if it currently is, it is somewhat
 7 unfortunate because it could come in late from -- I
 8 believe it was CBI or didn't come in -- it wasn't one
 9 of those things that was immediate.
 10 **Q. All right. And the screenings were for**
 11 **criminal background?**
 12 A. Criminal background check --
 13 **Q. Anything else?**
 14 A. -- as I understand. Not that I recall
 15 specifically in that in terms of -- unless they saw
 16 something perhaps. Well, there's a screen -- I think
 17 there is a question -- or a couple of questions when
 18 you apply for the job, Have you ever been convicted of
 19 a crime or a felony, those kind of things, if
 20 anything, would be flagged.
 21 **Q. All right. And --**
 22 A. Actually, there is a screening of
 23 employees now that I remember that.
 24 **Q. Tell me about that.**
 25 A. Bus drivers, there's random drug tests

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1 for existing employees, and I'm sure that's going to
 2 be expanded in different areas. I don't know all of
 3 them. And employees were released because of that
 4 screening.
 5 **Q. All right. And LPS had a policy directed**
 6 **at those types of screenings in part because it was**
 7 **required by statute to do so.**
 8 A. By federal law, yeah.
 9 **Q. So because --**
 10 A. Other than the drug testing. The drug
 11 testing.
 12 **Q. Right. And the background, the criminal**
 13 **background checks that you did on new employes, that**
 14 **was required by statute as well?**
 15 A. It was statute in Colorado as well, as I
 16 understand it, yes.
 17 **Q. Right. And because of it was required by**
 18 **a statute, LPS did that?**
 19 A. Yes. To the best of my knowledge in our
 20 human resources office.
 21 **Q. Right. So you would agree that the**
 22 **existence of that statutory requirement was important**
 23 **in ensuring compliance?**
 24 A. Compliance?
 25 **Q. By LPS.**

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1 A. Of criminal activity, yes, and I believe
 2 it was important on their applications as well.
 3 **Q. All right.**
 4 A. Oh, I'm sorry, I keep doing this.
 5 **Q. No, go right ahead.**
 6 A. There was another screening, I just don't
 7 know how exactly it would occur, and it was more often
 8 with illegal immigrants that would come in and put a
 9 false social security number. And it wouldn't often
 10 be found immediately, but it usually would. And there
 11 were releases and I believe reporting them, I'm less
 12 sure about that, for those individuals.
 13 **Q. For employees?**
 14 A. Yes. We had several custodians that had
 15 -- good people, but they had to be released.
 16 **Q. All right. Let's switch gears if we**
 17 **could. I want to talk about the communications**
 18 **policies at Littleton Public Schools.**
 19 A. Not in this document?
 20 **Q. No, not in this document. You can put**
 21 **them away. Just leave that there. Ashley will**
 22 **collect those up. What was your role in developing**
 23 **the communications policy or strategy after the**
 24 **shooting?**
 25 A. My role?

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1 **Q. Yes.**
 2 A. Well, my role was to make a decision
 3 whether we were going to do it, how often we were
 4 going to do it. You know, I worked with our director
 5 of communications, and my decision at that time that
 6 the public's anxiety, particularly in our own families
 7 within Littleton Public Schools, needed fairly rapid
 8 communication, at least for the first few days and
 9 then periodic thereafter. Although we didn't have --
 10 although I did not have many calls actually through
 11 the duration, the duration I mean the first three,
 12 four months.
 13 **Q. Sure.**
 14 A. Things like that. Nevertheless, I
 15 believe that we needed to communicate something and we
 16 tried to do that.
 17 **Q. All right. So your decision was to**
 18 **recognize the anxiety of the parents of students at**
 19 **Arapahoe High School and you wanted to communicate**
 20 **with them?**
 21 A. Yes, directly.
 22 **Q. Okay.**
 23 A. You know, our board too, they wanted to
 24 be updated.
 25 **Q. Sure.**

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1 **(Deposition Exhibit 57 was marked.)**
 2 **Q. Do you recognize Exhibit 57?**
 3 A. I might just --
 4 **Q. Sure.**
 5 A. Yes.
 6 **Q. And Exhibit 57 is an e-mail that you sent**
 7 **to all LPS staff on December 15, 2013?**
 8 A. Yes.
 9 **Q. So two days after the shooting?**
 10 A. Yes.
 11 **Q. And then it's got Diane Leiker's e-mail**
 12 **address up at the top right, doesn't it?**
 13 A. Yes.
 14 **Q. And she's the director of communications?**
 15 A. Yes.
 16 **Q. All right. And in your e-mail on**
 17 **December 15, you tell everybody who works at Littleton**
 18 **Public Schools that you would like to take this**
 19 **opportunity to remind you of the district's protocols**
 20 **around requests for information, right?**
 21 A. Yes.
 22 **Q. And one of the things you say is that**
 23 **"Any request for information from a source outside of**
 24 **Littleton Public Schools should be forwarded to the**
 25 **LPS communications office," right?**

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1 A. Yes.

2 **Q. So you tell everybody at the district if**

3 **anybody asks you anything, send it to Diane Leiker or**

4 **her assistant, right?**

5 A. Yes. This sentence would say, whatever

6 that request was, please forward it to the LPS

7 communication.

8 **Q. So don't answer it yourself, send it to**

9 **someone else, right?**

10 A. No, I didn't say that. What I said was

11 any request for information from a source outside of

12 the district, please forward it so that they knew and

13 if there was any follow up that was necessary.

14 **Q. And that included specifically any**

15 **requests for information from parents, right?**

16 A. I assume so. That's what I put, yes.

17 **Q. So you didn't want teachers answering**

18 **requests for information from parents, did you?**

19 A. No, that's not true, I don't believe.

20 What I was saying is any information, any requests for

21 that should be forwarded. It's important that they

22 knew as well -- there's times when a communication

23 office might respond directly and a teacher might talk

24 to parents. I'm sure there were many parents that

25 were scared and the person they trusted most was the

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1 teacher.

2 **Q. So the intent of your sentence that says,**

3 **"Any request for information from a source outside of**

4 **Littleton Public Schools (media, social media,**

5 **parents, community agencies) should be forwarded to**

6 **the LPS communications office," that was not intended**

7 **to instruct or direct LPS employees not to answer**

8 **requests for information from parents?**

9 A. No.

10 **Q. Would it surprise you to hear that a**

11 **number of teachers have come in and testified that**

12 **that's exactly how they took that? That they were**

13 **told not to talk to anyone about what was going on?**

14 A. No, it doesn't surprise me. I don't know

15 talked to them but -- you know, frankly, if I might --

16 **Q. Sure.**

17 A. -- we don't restrict people talking to

18 other people, at least I don't, or nor would I, but if

19 they're uncomfortable, as a number of people were at

20 that time, they don't need to be. They can forward

21 that to the communication office, and there were a

22 number that were uncomfortable.

23 **Q. All right. Let's go ahead and mark this**

24 **as the next exhibit.**

25 **(Deposition Exhibit 58 was marked.)**

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1 **Q. Exhibit 58 appears to be another e-mail**

2 **from you to all LPS employees; is that right?**

3 A. Yes.

4 **Q. And this was sent the very next day,**

5 **December 16, right?**

6 A. Yes.

7 **Q. Less than 24 hours after Exhibit 57,**

8 **correct?**

9 A. Yes.

10 **Q. And one of -- in the middle of this**

11 **exhibit, you've written, "Members of my staff have**

12 **asked me to remind all employees of a couple of**

13 **important things as we think about the days ahead."**

14 **Do you see that?**

15 A. Yes.

16 **Q. And it goes on to describe the board**

17 **policy for electronic mail and Internet services,**

18 **right?**

19 A. Uh-huh. Yes.

20 **Q. And then it goes on to talk about what**

21 **information employees can disclose, right?**

22 A. Yes.

23 **Q. Okay. And my first question is, do you**

24 **recall what members of your staff asked you to remind**

25 **all employees of these important things?**

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1 A. Oh, my. Dan Maas was one of them. He

2 was our chief information officer.

3 **Q. All right.**

4 A. I know he had concern about the -- of

5 course he had a concern about what was happening with

6 the Internet as well, what was going down. Sorry, I'm

7 reading here.

8 **Q. That's okay. Go ahead and take a minute**

9 **and review this middle section.**

10 A. Okay.

11 **Q. All right. Are you ready?**

12 A. Yes.

13 **Q. All right. So Dan Maas was one of the**

14 **people who asked you to remind all of your employees**

15 **about these issues?**

16 A. Yes.

17 **Q. Anyone else?**

18 A. I don't recall.

19 **Q. All right. Well, one of the things you**

20 **are reminding all of your employees about is that they**

21 **can create liability for themselves and for the**

22 **district if they publish/post information about**

23 **another individual or an institution that portrays**

24 **them in a negative light. Do you see that?**

25 A. Yes.

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1 **Q. And you were telling every employee at**
 2 **LPS that if they say something that portrays an**
 3 **individual or an institution in a negative light, they**
 4 **could be liable for that, right?**
 5 A. Yes.
 6 **Q. What was your purpose in telling every**
 7 **LPS employee about that potential liability?**
 8 A. The purpose generally -- in general, and
 9 it was my staff who recommended this, because of use
 10 of other electronic media, that if they were to make
 11 accusations, they could potentially be liable from
 12 that individual who might sue them back for, for lack
 13 of a better word, defamation of character or something
 14 along that line, just to be careful.
 15 **Q. And you go on to explain in bold print,**
 16 **"This also applies to employees' personal e-mail,**
 17 **personal Web sites, and personal Facebook and other**
 18 **social media sites used for school or personal**
 19 **purposes," right?**
 20 A. Yes.
 21 **Q. And that's all in bold?**
 22 A. Yes.
 23 **Q. And your concern was your employees**
 24 **making accusations that might lead to a defamation?**
 25 A. Or some form of liability, and that was

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1 specific from our chief information officer.
 2 **Q. What kind of accusations were you worried**
 3 **about them making?**
 4 A. Oh, accusations that might say Jane Doe,
 5 for instance, was probable for X, Y, Z, that happened
 6 at school. They might say something about their
 7 character or their competence or something they may
 8 have less information about. And also I'd always been
 9 told, and this was provided to me, that there is a
 10 nexus, if you will, between actions outside of the
 11 district and directly with activities in the district
 12 so to be careful about that kind of thing.
 13 **Q. And this e-mail went out before teachers**
 14 **or faculty even returned to the school to collect**
 15 **their belongings, didn't it?**
 16 A. That, I don't recall if they were in the
 17 school at that time collecting.
 18 **Q. I believe that faculty showed up to**
 19 **collect their belongings on Tuesday, December 17.**
 20 A. I can't remember that.
 21 **Q. And I understand that, and I will**
 22 **represent to you that's the date that happened or**
 23 **maybe the 18th, actually, I apologize. Let me ask it**
 24 **real bluntly.**
 25 A. Sure.

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1 **Q. Isn't it true that this e-mail went out**
 2 **to silence all of the LPS employees from voicing any**
 3 **criticism of any other LPS employee or of the district**
 4 **or the school itself relating to anything that may**
 5 **have led up to the shooting?**
 6 A. No, I don't believe so.
 7 **Q. Would it surprise you to hear that that's**
 8 **precisely how it was taken by some of LPS's employees?**
 9 A. Not at all.
 10 **Q. But that was not your intent. It just**
 11 **happened that way?**
 12 A. No. No.
 13 **Q. Well, you go on at the end of this to**
 14 **remind everybody that "Littleton Public Schools is a**
 15 **family. We continue to care for one another as we**
 16 **move forward," right?**
 17 A. Yes.
 18 **Q. That's at the very bottom of this page**
 19 **just above your signature block.**
 20 A. Yes.
 21 **Q. Why wouldn't you let that family talk to**
 22 **one another about what may have gone wrong in the**
 23 **weeks and months leading up to this shooting?**
 24 A. I don't believe I ever felt that way or
 25 believed that. The staff talked to one another. They

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1 were hurting.
 2 **Q. Let's talk about the staff. As you know,**
 3 **or can probably surmise, one of the people I deposed**
 4 **in connection with this arbitration is Tracy Murphy.**
 5 **You know Mr. Murphy, right?**
 6 A. Yes.
 7 **Q. I asked Mr. Murphy whether or not there**
 8 **was a message overtly or covertly that came from the**
 9 **district to LPS employees not to talk to one another**
 10 **about what happened at the shooting and what mistakes**
 11 **may have been made leading up to it. And he reported**
 12 **to me, that that was, in fact, the message that came**
 13 **down from the district. Does that surprise you at**
 14 **all?**
 15 A. No.
 16 **Q. He also went on to explain to me that the**
 17 **faculty and administration at other schools were**
 18 **threatened with disciplinary action if they spoke to**
 19 **Arapahoe faculty members about the shooting and the**
 20 **events leading up to it. And he said, yes, that's**
 21 **exactly what he heard from a Powell Middle School**
 22 **teacher. So my question to you is, does that surprise**
 23 **you and did that happen?**
 24 A. Let me clarify, it does not surprise me
 25 that someone might believe that, say that. The

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1 anxiety level was huge, that they might interpret
 2 something in such a way, and I don't know all of the
 3 communications that went on between teachers or
 4 administrators or from us. But it doesn't surprise
 5 me, but there was no penalty, if you will.
 6 **Q. Let's make it more precise. Were**
 7 **teachers, administrators, faculty members from schools**
 8 **other than Arapahoe told that they would be**
 9 **disciplined if they spoke to faculty and staff at**
 10 **Arapahoe High School about the shooting or what may**
 11 **have led up to it?**
 12 A. Not that I'm aware of.
 13 **Q. Isn't that something that you would know?**
 14 A. Not necessarily. If it -- well, let me
 15 put it this way. If somebody was making explicit
 16 requirements of saying, you know, You're going to be
 17 disciplined, here's our actions, I would probably have
 18 heard that, not necessarily but probably if it was a
 19 first staff from somebody or if it was a general
 20 belief. More often I would think it would be
 21 something different than that. Teachers that are
 22 scared, Do I have to talk to somebody? That I did
 23 hear.
 24 **Q. All right. Well, let me ask on**
 25 **Exhibit 58, which is a December 16 e-mail. Was one of**

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1 **the purposes of your sending Exhibit 58 to prevent or**
 2 **limit any public criticisms of Littleton Public**
 3 **Schools, Arapahoe High School, or any of the people**
 4 **who worked for those organizations?**
 5 A. Absolutely not.
 6 **Q. Let's talk about the first day that**
 7 **faculty was allowed back at Arapahoe High School, and**
 8 **it was either December 17 or December 18. You were**
 9 **there that day, I remember?**
 10 A. I don't remember. It feels like I was
 11 there every day, but I'm not sure.
 12 **Q. And the teachers were allowed and the**
 13 **faculty members and other employees were allowed back**
 14 **to gather their belongings and to meet before the**
 15 **students returned the next day, right?**
 16 A. Yes. One of those days, the second or
 17 third or fourth day, somewhere in there, yes.
 18 **Q. Okay. And given the public interest in**
 19 **this tragedy, there was media and law enforcement**
 20 **present at the school when the faculty returned,**
 21 **correct?**
 22 A. I don't recall specifics about that, but
 23 I would be willing to say yes.
 24 **Q. All right. It's my understanding that**
 25 **there were a couple of employees who were not**

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1 **permitted to return that day to gather their**
 2 **belongings. Do you remember that?**
 3 A. Yes, I believe I do.
 4 **Q. Okay. And the two employees, I'll make**
 5 **no secret about it, were Cameron Rust and Christina**
 6 **Kolk, right?**
 7 A. Yes.
 8 **Q. They were the only employees who weren't**
 9 **permitted to return to the school that day along with**
 10 **the rest of the faculty and staff, correct?**
 11 A. You mean along with them?
 12 **Q. Yes.**
 13 A. To come along with them?
 14 **Q. Yes.**
 15 A. That's my recollection.
 16 **Q. Who made the decision that Cameron Rust**
 17 **and Christina Kolk would not be allowed back in the**
 18 **school on December 17 or December 18 with all of that**
 19 **media and law enforcement?**
 20 A. I did.
 21 **Q. Tell me why you made that decision.**
 22 A. I talked to the sheriff at that time and
 23 what do you do with someone who is involved directly
 24 in a shooting or something of this kind. And my
 25 understanding from him is they discussed with the

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1 psychologist -- they had somebody just to talk to give
 2 an assessment, This person is ready to get back on the
 3 job. And so he had referred an individual to me named
 4 John Nicoletti, and at that point, it made sense to me
 5 to say, These people were in the center of this, let's
 6 see if they'll talk to someone and -- which I believe
 7 they did.
 8 **Q. All right. Was James Englert allowed**
 9 **back into the school on December 17 or 18?**
 10 A. I don't recall.
 11 **Q. Was Darrell Meredith allowed back into**
 12 **the building on December 17 or 18?**
 13 A. I believe so.
 14 **Q. And you know, he was one of the people**
 15 **who carried Claire out to the ambulance so that she**
 16 **could be transported to Littleton Hospital?**
 17 A. Yes.
 18 **Q. He wasn't subject to this further**
 19 **evaluation by Dr. Nicoletti, he was just allowed back**
 20 **into the school, right?**
 21 A. He was. Yes. He was not one of the
 22 direct security or campus supervisors.
 23 **Q. And Rod Mauler was allowed back in that**
 24 **day too, wasn't he?**
 25 A. I don't know. I don't know.

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1 **Q. All right.**
 2 A. I assume not.
 3 **Q. And you don't know about Deputy Englert;**
 4 **is that right? You believe he was but you don't know?**
 5 A. I don't know for certain. I think that
 6 wouldn't have been my call per se, but . . .
 7 **Q. Sure. By December 17 or December 18, you**
 8 **were aware that Cameron Rust and Christina Kolk were**
 9 **unhappy with Arapahoe High School and how the school**
 10 **had handled Karl Pierson, weren't you?**
 11 A. Not Christina Kolk. I did not know.
 12 **Q. Okay. Cameron Rust though?**
 13 A. Cameron Rust I had been told was --
 14 because of an incident that had occurred.
 15 **Q. And one of -- at the time you made the**
 16 **decision not to let Cameron Rust and Christina Kolk**
 17 **back into the school, you were aware that one of their**
 18 **-- at least one of Cameron's complaints was that**
 19 **people at the school had been told that Karl Pierson**
 20 **was looking at guns and nothing happened, right?**
 21 A. What I would like to clarify is I did not
 22 believe that he should not go back into the building.
 23 What I did believe is he ought to talk to someone.
 24 What I had heard is he was -- his behavior was -- he
 25 was very upset.

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1 **Q. Right. And one of the reasons --**
 2 A. I had never met the man.
 3 **Q. One of the reasons he was upset was**
 4 **because he had told administrators or at least one**
 5 **administrator at Arapahoe High School after the threat**
 6 **assessment that Karl was looking at guns and nobody**
 7 **did anything. You knew that at the time you told --**
 8 **you made the decision not to let Cameron Rust back**
 9 **into the building that day with all of that media and**
 10 **all of that law enforcement around; isn't that right?**
 11 A. No, it's not right.
 12 **Q. What have I got wrong in that sequencing?**
 13 A. I did not know that he had seen a gun. I
 14 did not know that there was something that he was
 15 blaming administration on. I began to hear he was
 16 upset, and what I had been told is he would not look
 17 the principal in the eye and would turn his back on
 18 them. And I said, This guy is upset, but who is he.
 19 I really didn't know.
 20 **Q. All right.**
 21 A. Not really didn't know, I didn't know.
 22 **Q. So at the time you made the decision not**
 23 **to allow Cameron Rust back into the school on**
 24 **December 17 or 18, you were not aware that he had**
 25 **expressed any criticisms of the school's handling of**

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1 **Karl Pierson? Have I got that right?**
 2 A. No. I'm looking at my time frame, but I
 3 don't think so.
 4 **Q. All right. You mentioned that you**
 5 **believe that -- or you don't know whether or not Rod**
 6 **Mauler was allowed back in the school on December 17**
 7 **or December 18, right?**
 8 A. No, I don't remember.
 9 **Q. But you believe he was not because he was**
 10 **sort of at the center of things?**
 11 A. No, I don't know what I believed at the
 12 time. I can't remember but it makes sense to me.
 13 **Q. Well, and the reason I asked the**
 14 **question, and I presume you know this, the Tuesday**
 15 **after the shooting on December 17, Rod Mauler actually**
 16 **walked Mike and Desiree Davis through the school to**
 17 **show them where things had happened. Do you recall**
 18 **that happening, or were you aware that it did happen?**
 19 A. I don't recall. I don't recall that it
 20 was Rod Mauler. I don't.
 21 **Q. All right.**
 22 A. I know at some period of time Michael and
 23 Desiree were allowed to go into the building. I don't
 24 think there was anyone that stopped them. I can't
 25 remember if it was the sheriff's office or somebody

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1 went with them, how that unfolded.
 2 **Q. Well, if it was Rod Mauler who walked**
 3 **them through the school that evening, would that**
 4 **refresh your recollection that, in fact, he was**
 5 **allowed back into the school, in fact, at the same**
 6 **time or even before other faculty members?**
 7 A. If I had known -- I didn't know. I don't
 8 recall that.
 9 (Deposition Exhibit 59 was marked.)
 10 **Q. Do you recognize Exhibit 59 as a letter**
 11 **that you sent out to all LPS parents and staff on**
 12 **December 29, 2013? And feel free to take a minute to**
 13 **review it.**
 14 A. Okay.
 15 **Q. My first question is, do you recognize**
 16 **this is a letter that you sent out to LPS parents and**
 17 **staff on December 29?**
 18 A. Yes. In general, there were a lot of
 19 communications, but yes.
 20 **Q. One of the things that you mentioned in**
 21 **this December 29 letter is that LPS has chosen not to**
 22 **participate in public discussion of the people or the**
 23 **events of December 13, 2013. Do you see that --**
 24 A. Yes.
 25 **Q. -- on the bottom half of the page?**

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1 A. Yes.

2 **Q. Did you in -- well, strike that.**

3 **You go on in the second-to-last paragraph**

4 **to make the point that "There will be plenty of time**

5 **in the weeks to come for all of us to discuss how we**

6 **move forward, what changes have been implemented, what**

7 **is being contemplated, and how we will honor Claire,"**

8 **right?**

9 A. Yes.

10 **Q. Tell me about the discussions about how**

11 **to move forward, what changes have been implemented,**

12 **what is being contemplated, and how the school was**

13 **going to honor Claire. And let's break that down.**

14 A. Okay.

15 **Q. All right. Did LPS ever convene any kind**

16 **of parent/faculty meetings to discuss the events**

17 **surrounding 2013?**

18 A. I believe there was.

19 **Q. Okay. When was that?**

20 A. That, I don't remember.

21 **Q. Do you recall generally what the time**

22 **frame was?**

23 A. School was closed. So sometime, I

24 believe, in January.

25 **Q. Did you attend that?**

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1 A. I may. I don't remember. I know one I

2 did not.

3 **Q. Okay. And do you recall any discussions**

4 **at that meeting or any other public meetings about any**

5 **things that were missed in the school's or the**

6 **district's handling of Karl Pierson in the weeks and**

7 **months leading up to this shooting?**

8 A. No. I do recall accusations without

9 specificity.

10 **Q. What were the accusations you recall**

11 **here?**

12 A. Along the lines of, You must have known

13 something. We want to know who is responsible, boards

14 have obligations, they were angry. Some were

15 confused. Some were hurt. My observations were more

16 at the school board level and public meetings that

17 people came to.

18 **Q. All right. Well, you're aware that one**

19 **of the early accusations was that school**

20 **administrators were aware after the threat assessment**

21 **that Karl was observed looking at guns on his computer**

22 **and the school didn't do anything, right?**

23 A. I don't remember that accusation early

24 on, and I don't remember when that began to come out.

25 **Q. But you're aware of that accusation?**

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1 A. Oh, yes. Yes.

2 **Q. And the school didn't respond to that,**

3 **did it, neither did the district?**

4 A. Respond? I'm not --

5 **Q. Publicly, privately, to the Davises, to**

6 **anyone?**

7 A. No. Publicly there was -- no, not that I

8 recall.

9 **Q. And not privately to the Davises either?**

10 A. Not that I recall.

11 **Q. And that accusation turned out to be**

12 **true, didn't it?**

13 A. That's what he said, and that's what

14 Darrell Meredith later said he thought so.

15 **Q. So that accusation turned out to be true,**

16 **didn't it?**

17 A. To the best of my knowledge, yes.

18 **Q. And that was a mistake, was it not, to**

19 **respond or follow up when that was -- when that gun**

20 **viewing incident was reported to school**

21 **administration, correct?**

22 A. I don't believe -- I thought there was

23 follow-up.

24 **Q. Really? What follow-up did you**

25 **understand there was on that gun viewing incident by**

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1 **Karl Pierson just a few weeks before he shot Clair**

2 **Davis to death?**

3 A. Oh, before. When did I know about it?

4 **Q. No. I'm asking what follow-up occurred**

5 **when that gun viewing incident was reported --**

6 A. I'm sorry. I'm sorry. I was thinking

7 after December 13.

8 **Q. -- to Arapahoe High School**

9 **administration?**

10 A. I thought you said December.

11 **Q. That's fine.**

12 A. I don't know any follow-up that was done.

13 **Q. And that is what my question is focused**

14 **on. That was a mistake on the part of Arapahoe High**

15 **School administration, wasn't it, not to follow up on**

16 **that incident?**

17 A. It was a judgment that they made. In

18 retrospect, I think it was a mistake, if that makes

19 sense.

20 **Q. Now, I've seen documents as part of this**

21 **arbitration that are a written report of debriefings**

22 **that occurred after the shooting about how the**

23 **lockdown went and how the interaction with law**

24 **enforcement went, those kinds of things. Have you**

25 **seen those similar documents? And I'm not getting**

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1 **into them in detail.**
 2 A. I may have. I don't recall them.
 3 **Q. But you're aware that those debriefings**
 4 **occurred, correct?**
 5 A. Debriefings with my staff, yes, that's
 6 what I recall.
 7 **Q. All right. I have heard from multiple**
 8 **witnesses that there was no similar debriefing done at**
 9 **either Arapahoe High School or at the district level**
 10 **about what went well and what went not so well in the**
 11 **handling of Karl Pierson, the threat assessment, and**
 12 **his other behavioral issues. Are you aware that such**
 13 **a debriefing on those issues never occurred?**
 14 A. As far as I know, they did not, but they
 15 may have.
 16 **Q. And my question --**
 17 A. I did not do any.
 18 **Q. And my question is this, who made the**
 19 **decision not to conduct a debriefing at either the**
 20 **school or the district level on what went well and**
 21 **what did not go well in the handling and assessment of**
 22 **Karl Pierson in the fall of 2013?**
 23 A. I don't know, but I would have probably
 24 made that -- if I had had the opportunity, I would
 25 have done that early on.

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1 **Q. All right. And can you tell me why, if**
 2 **you're the one who made the decision, you made the**
 3 **decision not to do any kind of debrief or critical**
 4 **assessment of what went well and what did not go well**
 5 **in the handling and assessment of Karl Pierson back in**
 6 **the fall of 2013?**
 7 A. After the events of December 13, neither
 8 I nor my staff knew all of the pieces that were
 9 falling into place. We met daily, probably for 18
 10 hours a day just trying to take care of emotion, what
 11 we needed to do with regard to counseling, kids,
 12 family, communications, knowing what went well and
 13 didn't go well. We didn't have all of the pieces
 14 certainly. I didn't know a whole lot about threat
 15 assessments, as I said earlier, and how that unfolded
 16 and what was involved. I didn't know about the guns
 17 and who knew about the guns and whether that would
 18 even come to a conversation and at what time.
 19 We also had a sheriff's department that
 20 was starting their investigation. We had other bodies
 21 that were in the school also doing some form of
 22 investigation, which I was not aware of. I don't
 23 think we had sufficient information to do debriefing
 24 other than with my staff what I knew was the -- and
 25 there was a praise to the staff, I think, on several

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1 occasions. Not only the press do it, but I believe
 2 Natalie and her staff did, just in terms of being --
 3 and I know our security did. I don't know in what
 4 format to say, You did the right thing to get the kids
 5 out of there and you did it in a way that -- and the
 6 sheriff did the same thing, acknowledged their
 7 contribution.
 8 **Q. And I'll absolutely echo that. Once the**
 9 **school went on lockdown, the teachers did things just**
 10 **the way they were supposed to do it, and they**
 11 **absolutely deserve praise for that.**
 12 A. Yeah, they do.
 13 **Q. But what I'm focusing on right now is**
 14 **something entirely different, and I want to be very**
 15 **clear on the distinction I'm drawing. I'm asking you**
 16 **why you didn't direct that a debriefing or critical**
 17 **assessment occur of the things that went well and**
 18 **didn't go well before Karl walked through those north**
 19 **doors with a shotgun in his hand?**
 20 A. We did. But we did it through the
 21 sheriff's office. We didn't know all of the pieces.
 22 I didn't know if the door went through -- the first
 23 reaction I had was, What the hell is he doing coming
 24 through that door? Who did this? How did he get in?
 25 I didn't know whether it was propped. And, frankly, I

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1 did not, and I chose not to look at the tapes for a
 2 host of reasons personally. But what I was told --
 3 and I began to learn more from the sheriff's
 4 department as things came through.
 5 **Q. Sure. And we're going to get to that,**
 6 **obviously.**
 7 A. Okay.
 8 **Q. But --**
 9 A. I didn't know what went well. The one
 10 thing I did know went well is how they handled it
 11 after the shooting occurred. I knew about that. I
 12 also knew -- that was getting out of the building.
 13 And I also knew with my staff when we were -- because
 14 every day -- I don't know if you would call it every
 15 day, but every day and early on, probably every couple
 16 of hours, we were talking about who was doing what and
 17 when in the evacuation of the students. It wasn't
 18 just out of the school, but where was the relocation
 19 and where did the kids end and who was talking to the
 20 kids. Who is there emotionally to support them. And
 21 counselors were there, and if I recall correctly,
 22 Arapahoe County -- or Arapahoe/Douglas County Mental
 23 Health did. And there was some confusion between
 24 Euclid in there, because parents were looking for both
 25 locations for them and that kind of thing.

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1 **Q. And I understand all of that and what I'm**
 2 **-- as I said, what I'm focused on is what went well**
 3 **and what didn't go well before the shooting started.**
 4 **And what I'm asking is did -- not the sheriff, but did**
 5 **LPS or did Arapahoe High School conduct any kind of**
 6 **critical assessment of what went well and what went**
 7 **poorly with respect to the handling of Karl Pierson**
 8 **prior to December 13, and if not, why not?**
 9 A. I need to pause here for a moment.
 10 **Q. That's fine. This is a really important**
 11 **question.**
 12 A. Questions were asked, information was
 13 sought to be found out. Who knew what when. How --
 14 who was this student? How did this come about? What
 15 did teachers know? And interviews began to occur to
 16 begin to get as much information as possible that we
 17 knew.
 18 **Q. And who was doing that information**
 19 **gathering for Littleton Public Schools or Arapahoe**
 20 **High School?**
 21 A. Our staff was certainly asking some of
 22 the questions.
 23 **Q. No. I need a name.**
 24 A. Well, Nate was trying to find out some
 25 information. The principal was trying to find out a

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1 little bit more information, though she was doing far
 2 more caretaking. The conversations with the staff,
 3 and I'm pausing for a moment here. Our legal counsel
 4 began to talk to people because we did not know all
 5 the pieces. We didn't know what people knew.
 6 **Q. And I understand, as I'm sure you do,**
 7 **that I'm not seeking information that --**
 8 A. That's why I'm pausing.
 9 **Q. -- came through legal counsel. Let me**
 10 **ask this, as that information gathering process**
 11 **occurred, how was it reported back to you? Did you**
 12 **receive a document that said, Here is what went well**
 13 **in the months leading up to December 13, here is the**
 14 **things that went poorly leading up to the month of**
 15 **December 13?**
 16 A. I didn't -- I don't recall receiving a
 17 document that said, Here is a debriefing, here is what
 18 went well, here is what didn't. I don't recall if
 19 there was one along that line.
 20 **Q. And I haven't seen one, which is why I'm**
 21 **asking the question. I didn't know if one was done**
 22 **and it was privileged or if it just wasn't done.**
 23 A. I mean, people would talk every day. We
 24 were in my conference room every day talking about
 25 what people knew but more how -- you know, this was

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1 about caretaking of the people.
 2 **Q. Okay.**
 3 A. And I don't know if I can address
 4 Desiree, but to be perfectly honest, we didn't know
 5 what to do to care at that point. And we did know our
 6 area in the school district what to do. And I -- my
 7 understanding is there were two strong supporters who
 8 were personal acquaintances, you being one and another
 9 individual named Bob Lembke, that were trying to help
 10 as much as possible. And Michael and I met at the
 11 hospital, but we didn't know each other well. It was
 12 a terrible traumatic time.
 13 MR. ROCHE: Why don't we go ahead and
 14 take a break.
 15 (Recess taken, 12:59 p.m. to 1:52 p.m.)
 16 **Q. (BY MR. ROCHE) Before we broke, we were**
 17 **talking about Exhibit 59 which --**
 18 A. Yes.
 19 **Q. -- contains the mention that there would**
 20 **be time in the weeks to come to discuss how to move**
 21 **forward, what changes to implement, et cetera, right?**
 22 A. Uh-huh.
 23 **Q. In that regard of -- on that vein of**
 24 **public discussion of changes and things, I want to ask**
 25 **you, who is Harry Rhulen from Firestorm Security?**

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1 A. That is who he is. He's the CEO of
 2 Firestorm. I didn't know it was security, but, yeah,
 3 Firestorm.
 4 **Q. And what was his role advising LPS with**
 5 **respect to the shooting on December 13?**
 6 A. I had a number of calls, I imagine, from
 7 different superintendents, just as you might expect,
 8 expressing shock, surprise, sympathy for what has
 9 happened to Michael and Desiree and our district as a
 10 whole. One superintendent specifically said, No one
 11 will tell you this probably because they don't know,
 12 but there is an individual who has been through this
 13 who can tell you a little bit just seeing it and
 14 knowing a little bit about how you handled things
 15 immediately afterwards, just to give you perspective
 16 on communication or issues you might be dealing with.
 17 And that was pretty much his role and nothing else.
 18 **Q. To advise on communications relating to**
 19 **the shooting and the aftermath?**
 20 A. Yeah, a little bit of that, and we used a
 21 couple other people that I didn't know directly. But
 22 the superintendent from Douglas County volunteered her
 23 staff. She had two staff to help me. And I never had
 24 anything like this, I mean --
 25 **Q. Sure.**

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1 A. -- obviously the shooting, but
 2 media-wise, we had Japan calling. We had Al Jazeera,
 3 CNN. There were people -- I don't remember her first
 4 name, Cabrara, she was actually a Littleton student,
 5 was going to take Ann Trujillo's place. She was there
 6 with CNN, and I didn't totally know what to do.
 7 What I did begin to feel over time is
 8 that the news media, who I have friends, but expect
 9 that, is to keep a story going in such a way that it's
 10 counterpoint at least until people don't read it
 11 anymore. And I didn't think that would be helpful to
 12 anyone, lead to maybe misperceptions. Everything from
 13 -- well, it doesn't matter. It leads to things.
 14 Certain frustrations, anger, sorrow. A long-term goal
 15 was how can we get the school, at least for Arapahoe,
 16 through that year. We had -- we canceled school for a
 17 period of time. We gave extra days to teachers, just
 18 for when they broke down, not against their vacations.
 19 **Q. Sure.**
 20 A. Suspended exams as much as we could,
 21 except for those that really needed them for their
 22 college. Katie was probably one of them.
 23 **Q. Sure.**
 24 A. And that's pretty much his role. He
 25 didn't know things about emotion and how to address

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1 that.
 2 **Q. And as I understand the sort of macro**
 3 **level of communications strategy that LPS adopted, it**
 4 **was simply not to engage in any public discussion of**
 5 **anything; is that fair?**
 6 A. What we tried to do is say that we were
 7 looking at what we can do better. We're always
 8 looking at how we can improve, that a sheriff's report
 9 was ongoing and there would be -- we didn't want to
 10 put ourselves ahead of the sheriff. In fact, the
 11 sheriff said, We're writing this, we're doing the
 12 research, you're not doing this. And any -- in a
 13 polite way said, Anything in that and/or from your
 14 staff could be construed as obstruction of justice.
 15 So, of course, ours was more of assurance
 16 that we're trying to move forward, there would be a
 17 number of changes. And as things went on, there were
 18 some changes that were made. But I remember before we
 19 left, you were asking about here is what we did well,
 20 here is what we did. And so, frankly, I've got a
 21 sheriff's report coming out. I don't know what is
 22 totally being done well. I know specifically about
 23 the actions we take and that you acknowledge in terms
 24 of both evacuation and trying to heal and we had -- we
 25 probably had 80-plus counselors working with staff,

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1 and I don't know how many -- excuse me.
 2 **Q. Go ahead.**
 3 A. We have kids to this day, I don't know if
 4 they'll ever heal. I see them at mass. I mean, I --
 5 it was a terrible situation. We'd never been through
 6 it.
 7 **Q. It was. I'm raising one of those kids,**
 8 **as you know.**
 9 A. I know you are. And I don't know. My
 10 priest's son was a friend of Karl's. He can't put it
 11 together. I'm sorry.
 12 **Q. It's okay if you want to take a minute.**
 13 **I really meant what I said. This is hard stuff. So**
 14 **let's just take a second.**
 15 **(Recess taken, 1:59 p.m. to 2:06 p.m.)**
 16 **Q. (BY MR. ROCHE) I want to ask you about**
 17 **another letter that you sent out. This one is from**
 18 **January of 2014.**
 19 **(Deposition Exhibit 60 was marked.)**
 20 **Q. Do you recognize Exhibit 60 as a letter**
 21 **that you sent to all parents and staff from LPS in**
 22 **January of 2014?**
 23 A. Yes.
 24 **Q. Okay.**
 25 A. Yes. Excuse me.

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1 **Q. Thank you. I want to touch on a couple**
 2 **of different things in this letter. One is -- the**
 3 **first thing I want to ask you about is about**
 4 **two-thirds of the way down, you've written that you**
 5 **want to reiterate our full faith and confidence in the**
 6 **administrative team at Arapahoe High School. Do you**
 7 **see that?**
 8 A. Yes.
 9 **Q. And that administrative team included**
 10 **obviously the principal and the assistant principals,**
 11 **correct?**
 12 A. Yes.
 13 **Q. And the counseling staff as well?**
 14 A. Yes, and their office as well.
 15 **Q. And so that would include Darrell**
 16 **Meredith, right?**
 17 A. Yes. The counseling staff, no.
 18 **Q. Right. The administrative staff would**
 19 **include Darrell Meredith, right?**
 20 A. Yes.
 21 **Q. And Kevin Kolasa?**
 22 A. Yes.
 23 **Q. And the counseling staff would include**
 24 **Esther Song, the school psychologist, correct?**
 25 A. That's why I said -- she wouldn't have

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1 been one of the administrative staff. It would have
 2 been the principal, the assistant principals, and the
 3 dean at that time and their immediate staff probably
 4 there in the administrative office.

5 **Q. Did you understand that there was a dean**
 6 **at Arapahoe High School in 2013?**

7 A. I thought there was.

8 **Q. Do you know who it was?**

9 A. I want to say Bryan Jesse, but I'm not
 10 positive.

11 **Q. All right. He was at Arapahoe. What I**
 12 **want to focus on with respect to this sentence is, did**
 13 **your full faith and confidence in the administrative**
 14 **team, Darrell Meredith, Kevin Kolasa, did that ever**
 15 **change as the facts became more known to you about**
 16 **what had gone well and what had gone not so well in**
 17 **the handling of Karl Pierson?**

18 A. I think so, yeah.

19 **Q. Okay. Tell me about that.**

20 A. Darrell Meredith less so because I
 21 watched him and I saw him often at the school and just
 22 watched him. Kevin I saw less of. You know, he would
 23 be at meetings, and I knew Kevin's commitment -- I
 24 mean, Darrell's commitment. But the administrative
 25 team, from my perspective, was a reflection of Natalie

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1 and I -- and, of course, she had always felt that they
 2 were doing everything they can to help Arapahoe be
 3 able to get through that semester and to think through
 4 what needed to be done. I don't -- I don't know what
 5 I would have said differently on one level, because
 6 part of my job is also to give people some assurance
 7 that I, as a CEO, have confidence as opposed to saying
 8 I don't have confidence that your child is here, get
 9 them out as soon as possible or imply that.

10 To this day, maybe always, maybe
 11 everybody doesn't feel this way, I don't know.
 12 Natalie is one of my heros and Darrell is right up
 13 there too. Darrell did some things that I might not
 14 have done, but I also watched the way he did do
 15 things, and Bryan Jesse is a very caring individual.
 16 I know I'm missing someone. Kevin is there, I knew
 17 less about Kevin and what he had done.

18 **Q. And I appreciate that, and my questions**
 19 **are a little more focused than that. After you**
 20 **learned that Darrell Meredith, who knew about the**
 21 **threat assessment that had been done on Karl**
 22 **Pierson -- after he was informed that Karl was seen**
 23 **looking at guns in the school cafeteria and he did**
 24 **nothing, did that cause you to lose any faith or**
 25 **confidence in his abilities or his judgment?**

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1 A. At the time I wrote this -- and you may
 2 be asking another question after this period of time.

3 **Q. I am asking about after this because I**
 4 **assume at this point you didn't know that?**

5 A. Yeah, and I -- and it was becoming -- I
 6 still didn't know everything that was involved. I
 7 know what people were saying. I guess to some extent
 8 to this day, while I'm willing to accept what was
 9 said, I don't have reason not to, but I don't have a
 10 reason to -- I don't know what was in there. I
 11 watched Darrell from a different perspective. But as
 12 I heard it, and if I could take it to the next step if
 13 it was indeed true, which I've been --

14 **Q. Darrell testified it was true. So let's**
 15 **eliminate any hint of a doubt about that.**

16 A. Okay.

17 **Q. Darrell flat out said under oath, Yes, I**
 18 **was told he was looking at guns, and, yes, I didn't do**
 19 **anything about it.**

20 A. Okay.

21 **Q. So let's start with that as the premise.**
 22 **Given that you were told that sometime after January**
 23 **17, did that cause you to have doubts about your faith**
 24 **and confidence in his judgment and his position as an**
 25 **administrator at Arapahoe?**

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1 A. In his judgment, yes. Yes.

2 **Q. Did you take any action based on those**
 3 **doubts?**

4 A. No, not directly, no.

5 **Q. Now, let's talk about Kevin Kolasa.**

6 A. Okay.

7 **Q. All right. At the time you wrote this**
 8 **January 17, 2014, letter, I'm assuming, but tell me,**
 9 **did you have full faith and confidence in Kevin**
 10 **Kolasa?**

11 A. At that point in time, I would say yes,
 12 but I didn't know him well, and I didn't know his
 13 whole role.

14 **Q. And did your level of faith and**
 15 **confidence in Kevin Kolasa change at some point**
 16 **subsequent to January 17, 2014?**

17 A. Yes.

18 **Q. When and why?**

19 A. I can't give the exact time frame. Let's
 20 just say it unfolded because I didn't know everything
 21 about this. And I -- there was an investigation going
 22 on, and I recognize that. But what I began to learn
 23 is that Kevin is not a bad person. I mean, he would
 24 do the right thing, but I began to wonder, doubt,
 25 whether what he was doing was putting things together.

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1 Individually, some of the incidents that
 2 occurred with Karl or any other student by themselves,
 3 could have been made to be a burst out, sometimes
 4 those were dealt with. But as other things came clear
 5 to me, I began to question in my own mind why pieces
 6 weren't put together. And it's given me some thoughts
 7 about the threat assessments as well.

8 **Q. Well, have you heard -- did you hear back**
 9 **at some point in the weeks and months after the**
 10 **shooting that there were faculty members at Arapahoe**
 11 **who didn't believe Kevin Kolasa was taking the threat**
 12 **that Karl Pierson made as seriously as they believed**
 13 **he should have?**

14 A. No, I didn't know that. Well, let me go
 15 to your second statement. As things began to unfold
 16 over a period of time, I had heard things that might
 17 lead me to believe that.

18 **Q. All right. Did you ever have a**
 19 **conversation with Tracy Murphy about this incident?**

20 A. Yes.

21 **Q. And during that conversation -- I'm going**
 22 **to get you some water.**

23 A. Thank you.

24 **Q. Tell me about your conversation with**
 25 **Tracy Murphy after the shooting.**

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1 A. One was to be -- in fact, it's the way I
 2 am for the most part. My focus --

3 THE DEPONENT: Thank you, Mike. I
 4 appreciate it.

5 MR. DAVIS: You're welcome.

6 A. -- was just to support him initially. I
 7 went over on numerous occasions just to basically give
 8 him a hug or a smile.

9 **Q. (BY MR. ROCHE) Sure. Did you also --**

10 A. And say --

11 **Q. Go ahead.**

12 A. He asked for a meeting with me. I can't
 13 remember at what time it was. It was in the months
 14 that followed at some point. And he wanted to come
 15 see me for about a half hour. And it ended up being a
 16 two-hour conversation and I tried to listen. I'm
 17 usually a pretty good listener, and, again, gave him
 18 some support. And he began to talk about his emotions
 19 and whether he should leave the high school and things
 20 he might have thought or said and then he kind of went
 21 circular. Which led me to believe he needed someone
 22 to talk and listen to. I knew he had a counselor. I
 23 don't know who that was.

24 **Q. Sure.**

25 A. He had known me, and I'd always said when

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1 I was there, If you ever need to talk, so he took me
 2 up on it.

3 **Q. And during your conversations with Tracy**
 4 **Murphy in the months following the shooting, did he**
 5 **let you know that he didn't believe -- he, Tracy**
 6 **Murphy, didn't believe that Kevin Kolasa had taken the**
 7 **threat that Karl Pierson made as seriously as it**
 8 **deserved to be taken?**

9 A. I don't remember him saying it. It does
 10 not mean he didn't. I don't remember that
 11 specifically.

12 **Q. Had you heard from any source in the**
 13 **months following the shooting that Tracy Murphy or**
 14 **anyone else felt that Kevin Kolasa hadn't taken the**
 15 **threat assessment as seriously as it should have been?**

16 A. No, I don't recall people saying that to
 17 me.

18 **Q. Did you hear from Vicki Lombardi at any**
 19 **point that she didn't believe that Kevin Kolasa was**
 20 **taking the outburst that Karl had on December 11 as**
 21 **seriously as it should be?**

22 A. No, I never talked to Vicki Lombardi. My
 23 first interaction -- frankly, I wasn't sure who she
 24 was, was in a staff meeting. I was just telling them
 25 a little bit about how things would unfold, this

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1 process. We didn't know all of it, but this was going
 2 on. And she broke down in tears, and she was at the
 3 top tier in the forum area.

4 **Q. All right. Did you hear from any source**
 5 **that Kevin Kolasa expressed that, We're going to read**
 6 **about this kid, Karl Pierson, in the paper someday,**
 7 **it's just not going to be at Arapahoe?**

8 A. I never heard it with Kevin Kolasa. I
 9 did hear that -- maybe it was Darrell Meredith, but I
 10 don't remember that with Kevin Kolasa.

11 **Q. Did you hear from any source that in the**
 12 **fall of 2013, sometime after the threat assessment,**
 13 **that Kevin Kolasa was advised that Karl's grades had**
 14 **nosedived, and upon being informed of this, Kevin**
 15 **Kolasa said, Let him hang himself?**

16 A. No. Say -- definitely not the last
 17 piece. What was the first part about grades, because
 18 I don't believe I heard that either.

19 **Q. All right. Sure. And I'll tell you**
 20 **about it because it is something that was a discussion**
 21 **between Tracy Murphy and Kevin Kolasa in the November**
 22 **time frame, so just three, four weeks before the**
 23 **shooting. Tracy Murphy told Kevin Kolasa, I'm**
 24 **concerned, Karl's grades have gone off of a cliff.**
 25 **They're mostly F's and D's now. And Kevin Kolasa's**

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1 **reaction was, Let him hang himself.**
 2 A. No, I did not know that nor did I hear
 3 that.
 4 **Q. If you had been aware of that, what would**
 5 **you have done?**
 6 A. What would I have done?
 7 **Q. As the superintendent.**
 8 A. About Karl?
 9 **Q. About Kevin.**
 10 A. About Kevin.
 11 **Q. Let's start with this. That's a terrible**
 12 **attitude for an educator to have, wouldn't you agree?**
 13 **Kid's grades are terrible, too bad, he's a pain in the**
 14 **ass. Let him hang himself.**
 15 A. Well, it's not something I would do.
 16 I've heard too many teachers say things sometimes when
 17 they're frustrated with certain people. So it's --
 18 you know, sometimes it's something else. But I
 19 frankly -- as a parent, I would not like to hear that.
 20 I could probably go so far as if it was my child, I
 21 would be appalled, Don't talk about them that way.
 22 **Q. Well, as a CEO of an educational**
 23 **organization, would you have disciplined Kevin Kolasa**
 24 **for displaying that attitude towards a student,**
 25 **particularly a student who was already on the radar?**

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1 A. I certainly would have talked to them.
 2 As I -- when other teachers burst out at times or
 3 administrators. It's probably not a surprise to
 4 people in any organization there's moments that people
 5 have. And in our business, it's a public business,
 6 but people give us their trust. And so I would have
 7 talked to him if I had known and say probably in a
 8 more professional way, but say, Knock it off, tell me
 9 what you're going to do about it. People vent. I
 10 don't know what the circumstances were.
 11 **Q. What about Esther Song? You've talked**
 12 **about in January you had full faith and confidence in**
 13 **essentially everybody at Arapahoe High School, right?**
 14 A. Well, I said the administrative team who
 15 I had the most contact with.
 16 **Q. Understood. Was Esther Song intended to**
 17 **be included in this group in whom you had full faith**
 18 **and confidence?**
 19 A. No.
 20 **Q. As you learned more about what Esther**
 21 **Song did or didn't do in connection with the handling**
 22 **of Karl Pierson, did that create concerns in your**
 23 **mind?**
 24 A. After the event?
 25 **Q. Yes.**

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1 A. Yes.
 2 **Q. And we know that after the school year,**
 3 **Esther Song transferred away from LPS, right?**
 4 A. Yes.
 5 **Q. Was she in any way encouraged to do that?**
 6 A. Not that I'm aware of.
 7 **Q. We also know that after the school year,**
 8 **Kevin Kolasa transferred away from Arapahoe High**
 9 **School but within the LPS system, right?**
 10 A. Right.
 11 **Q. Was he encouraged to get out of Arapahoe**
 12 **High School in any way, shape, or form?**
 13 A. Not to my knowledge. I have no knowledge
 14 of that either being said. I was actually surprised.
 15 Not surprised that people would leave, but that he was
 16 leaving, which I thought it meant leaving, period.
 17 But Gary Hine, I believe, hired him over at Euclid
 18 Middle School I think. Yeah.
 19 **Q. As the facts became more known to you**
 20 **through and including the release of the sheriff's**
 21 **report, is there a reason that Kevin Kolasa, who still**
 22 **worked for the district, wasn't subjected to any**
 23 **discipline?**
 24 A. Kevin, as well as all staff there, had
 25 been hit pretty hard. Their job was something that

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1 nobody would ever want to have done or been a part of.
 2 I received nothing from anyone, not that it would be
 3 my direct responsibility, but I certainly understood
 4 -- my total focus had been recovery. And if it was
 5 best for him to leave, I thought good. Not just for
 6 there but events -- well, no, for there because as
 7 events became -- information became -- to come out
 8 more, one, I thought it would be good for the school
 9 and probably, two, for Kevin.
 10 Kevin came to talk to me at one point.
 11 He was concerned about how he might be portrayed,
 12 whether it would have an impact on his career. He was
 13 a mess. I mean, he -- it's not like others weren't
 14 too. And at that time, you know, I just listened and
 15 he had a higher goal of what he wanted to do, and I
 16 basically said, You need to pause and think very
 17 carefully about that. And I'm sure he walked away
 18 wondering what the heck that meant.
 19 But, you know, here is a guy who, to this
 20 day, I wonder what went through this head but was
 21 involved in this whole assessment. And here is a guy
 22 with three kids that runs down the hallway and goes
 23 into the library with somebody who has a shotgun and
 24 -- I would be a mess. If I was his wife, I would be
 25 asking him, What were you thinking? At the same time

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1 he wasn't thinking probably. But he -- I could say
 2 more about Kevin, but . . .

3 **Q. Yes, well, and candidly, I want to hear**
 4 **more about Kevin. Tell me about this conversation**
 5 **that you had with Kevin Kolasa after the shooting.**

6 A. Well, frankly, I had one that was not a
 7 conversation. It was honoring Claire at the coliseum,
 8 and I had never met he and his wife and his children.
 9 And I just tried to give them some consolation at that
 10 time. Then he came in, closer to the end of the year,
 11 and just talked and was -- seemed to be worried about
 12 what might -- what this all might involve and whether
 13 he would -- needed to worry about his career, and,
 14 frankly, he was also worried about -- well, I guess
 15 it's the same as worrying about a career -- what might
 16 be said. He didn't seem to indicate about what might
 17 happen to him emotionally at this point, but, you,
 18 know, a higher goal.

19 My reaction was both to listen and to
 20 also wonder what he had been thinking. I think the
 21 last thing I would be thinking of is going into a
 22 principalship after having that kind of shocking
 23 experience but okay. And my reaction was, Think
 24 carefully about that. What have you done there that
 25 would lead one to believe that you could not or should

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1 not be in a position like that? And he pondered and,
 2 you know, he never really answered other than to say
 3 he thought he had done the right things.

4 Of course, I began to find out more and
 5 more and I know he -- people don't get up in the
 6 morning to do bad things. In retrospect, had nothing
 7 happened to Claire, yet procedural processes, if I had
 8 known about them, if I was the supervisor, I would
 9 say, Now, look, try to do this -- pull these pieces
 10 together, but that's not the case. He not only shot
 11 -- that's the wrong word. He was not only a part of
 12 procedural errors that could have, might have had an
 13 impact on the outcome, but affected thousands of
 14 people. Not 10, not 20, not hundreds, thousands of
 15 people due to this day.

16 **Q. Right.**

17 A. I would have done things differently but
 18 I'm me. I don't know -- and I've always been careful
 19 not to make too much of an assessment on building
 20 principals or even the staff that are going through
 21 multiple things at the same time. I didn't run a high
 22 school, so I try to be respectful of that. But I also
 23 can be kind of hard. In retrospect, I believe in
 24 20/20 hindsight. I don't usually punish people, but
 25 they must learn. Unfortunately, this is the most

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1 disastrous thing I've ever seen.

2 **Q. Now, I want to switch gears and talk**
 3 **about that learning, which is the final thing in**
 4 **Exhibit 60 that I wanted to ask you about, and it's**
 5 **actually the first paragraph -- second paragraph.**
 6 **Same exhibit.**

7 A. I have 59. I'm sorry. Now I have 60.

8 **Q. And in Exhibit 60, your January 17**
 9 **letter, one of the first things you say is that we**
 10 **respect and learn from the past; right?**

11 A. Yes.

12 **Q. Okay. And that's consistent with what**
 13 **you just told me, that it's important to learn from**
 14 **the past, right?**

15 A. Yes.

16 **Q. Because if you don't, you repeat it,**
 17 **right?**

18 A. Generally.

19 **Q. And an essential element of learning from**
 20 **the past is taking a real hard critical look at that**
 21 **past and recognizing the mistakes that got made,**
 22 **admitting them, and addressing them, right?**

23 A. Oh, that's a question. Yes.

24 **Q. And I will tell you that's exactly what**
 25 **we're going to do at the end of this deposition is**

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1 **figure out what we can learn from this horrible past**
 2 **that we all share, because as you know, that is the**
 3 **core purpose of this arbitration, right?**

4 A. Yes. And I'm glad we're doing it
 5 together.

6 **Q. Agreed.**

7 MR. ROCHE: Let's go ahead and mark this
 8 as Exhibit 61.

9 (Deposition Exhibit 61 was marked.)

10 **Q. (BY MR. ROCHE) Exhibit 61 is yet another**
 11 **letter that you sent out to all LPS parents and staff**
 12 **in January of 2014, correct?**

13 A. 2023. I mean January 23.

14 **Q. January 23, 2014.**

15 A. I'm sorry, I was -- yes.

16 **Q. It's okay. And I want to ask you a**
 17 **couple questions about this letter. In the second**
 18 **paragraph, that starts with, "Our community has been**
 19 **challenged." Do you see that?**

20 A. Yes.

21 **Q. At the end of that paragraph, there is a**
 22 **mention of the notion that "All LPS employees are**
 23 **governed by federal and state laws that restrict any**
 24 **release of information pertaining to a student." It**
 25 **goes on to say, "The district also has a legal**

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1 **obligation to protect the privacy of all students and**
 2 **faculty." Do you see that there?**
 3 A. Yes.
 4 **Q. And one of the things that that paragraph**
 5 **refers to, I assume, but I'll ask you, is FERPA; am I**
 6 **right?**
 7 A. Yes.
 8 **Q. And FERPA is a federal law that defines**
 9 **certain parental rights and certain privacy**
 10 **requirements that exist for educational institutions,**
 11 **yes?**
 12 A. Yes.
 13 **Q. As you may have heard, that's a subject**
 14 **that's been discussed throughout this arbitration and**
 15 **over at the school safety committee at the Capitol.**
 16 A. I did learn that recently.
 17 **Q. Yes. And here is my question to you. Do**
 18 **you believe that either misunderstandings or confusion**
 19 **about what FERPA permits and prohibits created an**
 20 **impediment to effective information sharing at**
 21 **Littleton Public Schools or Arapahoe High School in**
 22 **this incident?**
 23 A. Do I believe FERPA prevented that?
 24 **Q. Do you think -- no, let me be very clear**
 25 **about it.**

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1 A. Confusion --
 2 **Q. Do you have the sense that confusion**
 3 **within LPS or Arapahoe High School about what FERPA**
 4 **permitted or prohibited caused any impediments to the**
 5 **effective sharing of information about Karl Pierson in**
 6 **the weeks or months prior to the shooting?**
 7 A. Prior to the shooting?
 8 **Q. Yes.**
 9 A. My first reaction is no, but maybe I
 10 don't -- I'm not understanding.
 11 **Q. Well, let me ask it more pointedly then.**
 12 **Several teachers either told me in this arbitration or**
 13 **told the sheriff's investigators as part of that**
 14 **investigation that even though they had Karl Pierson**
 15 **in a class, they weren't told anything about the**
 16 **threat assessment. And their understanding was that**
 17 **information wasn't shared with them because of FERPA.**
 18 A. Okay.
 19 **Q. All right. Is it your understanding that**
 20 **FERPA prohibited that type of information from being**
 21 **shared with Karl's teachers?**
 22 A. I don't believe that FERPA prevented
 23 information from being shared verbally among teachers.
 24 This is what I had heard, this is -- keep an eye out.
 25 You know, something verbally among teachers. I don't

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1 believe FERPA prevented that. The release of records
 2 is a different matter or disciplinary records, that
 3 kind of thing. But what I don't know, of course, is
 4 where they -- you know, they've had training over
 5 time, and I don't know exactly what was said
 6 beforehand, if they had a general understanding of
 7 FERPA. I didn't even know if all of them really knew
 8 what it was or the name of it.
 9 **Q. Well, when did you learn that there were**
 10 **teachers of Karl's who weren't told about the fact**
 11 **that he had been a subject of a threat assessment?**
 12 A. Likely in the spring, something like
 13 that.
 14 **Q. And when you learned that there were**
 15 **teachers who had Karl in class who weren't informed**
 16 **that he had been the subject of a threat assessment,**
 17 **did that concern you?**
 18 A. Well, after the fact, certainly.
 19 **Q. And --**
 20 A. Go on.
 21 **Q. And when you learned that there were**
 22 **teachers of Karl's who weren't told about the fact**
 23 **that he had been the subject of a threat assessment,**
 24 **did you do anything or ask anybody on your staff to**
 25 **look into why it was that those teachers weren't**

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1 **informed about the threat assessment?**
 2 A. I don't recall doing that. It doesn't
 3 mean I didn't, but I don't recall specifically on
 4 that. Because there may have been -- well, I just
 5 don't believe it's a violation of FERPA for me to
 6 share something that I heard or something that is
 7 going on. Now, it may be a violation to release
 8 certain records or disciplinary information.
 9 **Q. Even to Karl's teachers?**
 10 A. I believe it's required -- I think it's
 11 required under state statute too if there is a
 12 disciplinary action that's taken.
 13 **Q. Did you have an understanding in the fall**
 14 **of 2013 about what information was released to**
 15 **teachers who had a student who was suspended?**
 16 A. Not specifically, but in general I did
 17 because it was an issue in other schools.
 18 **Q. What was the understanding you had about**
 19 **how much information a teacher got when a kid was**
 20 **suspended?**
 21 A. My understanding was -- and I spent some
 22 time talking with the union as well as our teachers
 23 association, that there were incidents that would
 24 occur in school and teachers needed more information.
 25 It wasn't at Arapahoe I had heard that, but I had it

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1 repeatedly at another school and began to probe about
 2 why that is and what restrictions they believed were
 3 in place. I didn't know if the teachers weren't
 4 getting specific information, which they didn't --
 5 they weren't entitled to or if it was just verbal
 6 information. It may have been about what disciplinary
 7 action -- but it was arising at another high school.

8 **Q. Did you hear similar concerns at Arapahoe**
 9 **High School after the shooting?**

10 A. I didn't hear anything immediately after
 11 that. I had heard an ongoing concern that was similar
 12 and that was -- wasn't large, but it was around the
 13 same issue as had been at another high school.

14 **Q. What did you hear at Arapahoe High School**
 15 **on this subject?**

16 A. I didn't hear it directly. I only heard
 17 it -- well, maybe I did hear it directly. One teacher
 18 said, you know, We need to know information if
 19 something has happened.

20 **Q. Who was that teacher?**

21 A. Amanda Crosby.

22 **Q. Did you ever hear from Vicki Lombardi --**
 23 **and I'm referring to Exhibit 60, which you're free to**
 24 **look at. I'm sorry, not Vicki Lombardi, Michelle**
 25 **Crookham, that Arapahoe administration will not tell**

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1 **the teachers anything about student discipline, as it**
 2 **is a violation of the student's privacy rights?**

3 A. No, I didn't hear that from Michelle
 4 Crookham. I don't know Michelle Crookham.

5 **Q. Does it concern you that one of your**
 6 **teachers or that your administrators were under the**
 7 **impression that telling teachers about the**
 8 **disciplinary history of one of their own students was**
 9 **a violation of the student's privacy rights?**

10 A. Does it concern me? Yeah. I mean, what
 11 concerns me more is the confusion and where that came
 12 from and if there needed to be something straightened
 13 out in training a little bit about what was a
 14 violation, who has a -- a definition of who has a
 15 legitimate education or need to know as a teacher and
 16 how you define that and so on and so forth. The only
 17 person that would really specifically know that and
 18 have done that would be Lucinda Hundley, our assistant
 19 superintendent of student services. This was a very
 20 strong point for her I know. I didn't have to deal
 21 with it very much.

22 **Q. And all of that goes to directly what I'm**
 23 **talking about, which is, do you believe that there was**
 24 **a general sense of confusion or a misunderstanding**
 25 **among your teachers or administrators about what FERPA**

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1 **permitted?**

2 A. It sounds like it.

3 **Q. And when you became aware that there was**
 4 **a general sense of confusion or misunderstanding about**
 5 **what FERPA permitted or prohibited, what did you or**
 6 **Lucinda do to correct that problem?**

7 A. I didn't have an understanding of that.
 8 What I had an understanding of was that teachers
 9 wanted to know more -- I didn't know that there had
 10 been any conversation about FERPA or any other --
 11 nothing like that was mentioned. It was more, Look,
 12 we just need to know more. Now, they -- I'm certain
 13 they understand there is certain judgment calls that
 14 people make, and it's not every nickel-and-dime
 15 incidents, which schools tend to have or singular
 16 incidents. But there's one that -- you know, I'm not
 17 the administrator, but if I was the administrator, I
 18 probably would say, you know, This is one you just
 19 need to be aware of. This is what we're hearing.
 20 This is -- I'd say keep an eye out. Let me know.

21 **Q. Let me try it this way. Would it have**
 22 **been -- or was it a FERPA violation for the campus**
 23 **supervisors to disclose to the media that Karl Pierson**
 24 **was seen -- that they had seen Karl Pierson looking at**
 25 **guns on his computer in the cafeteria?**

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1 A. I never thought about it from that
 2 perspective. I don't know. I'll have to think about
 3 it for a minute.

4 **Q. All right. Well, let's talk about -- go**
 5 **ahead.**

6 A. I'm not sure people know -- some people
 7 know about FERPA, some people heard about people --
 8 some people react. Even I at times would probably be
 9 cautious, because I don't deal with it every day. So
 10 there is a prudent course of action that one might
 11 take to be careful and another where you might call
 12 counsel and say -- at least someone at my level, a
 13 teacher or staff wouldn't maybe, and say, Hey, does
 14 this make sense? More often we have requests around
 15 -- from the media. Rarely do I have concerns from
 16 anyone else that had been expressed to me, and it was
 17 more around the, you know, Colorado Open Records
 18 Act --

19 **Q. Sure.**

20 A. -- release of information. I mean, I
 21 know there's people that might say, Well, you know,
 22 this is what we think you should be able to do and not
 23 -- and I would always turn to counsel on something
 24 like that and get their advice.

25 **Q. And just so we're clear, the reason I'm**

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1 asking about these FERPA issues is, as you know,
 2 what's going to come out of this arbitration is a pair
 3 of reports with recommendations about how to make
 4 schools safer.
 5 A. Yes.
 6 Q. And that's going to be presented, among
 7 other places, at the legislature sometime next year.
 8 And if one of those recommendations would be to
 9 provide more clarity about what FERPA permits or
 10 prohibits, I think it's important to get your
 11 perspective on that as former superintendent of
 12 Littleton Public Schools. So I'll just ask it, you
 13 know, as straightforwardly as I can. Do you believe
 14 better and more clarity on what FERPA permits or
 15 prohibits would be helpful to teachers and
 16 administrators in this state to help make schools
 17 safer?
 18 A. I think it would be helpful to -- yes.
 19 The answer is yes, and there's some direct reason why.
 20 It helped -- well, as you said, it helps principals
 21 because they're cautious too. No principal wants to
 22 be taken to court by someone or have that threat of
 23 having that happen. And I think people need to know
 24 you can share information. Now, you may not be able
 25 to share records or disciplinary records, but there

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1 needs to be clarity.
 2 But if somebody has outbursts, I think
 3 there's a judgment. What's the spectrum? And I
 4 respect that. I understand that. And I don't know
 5 exactly how you put it in law, but hopefully there
 6 would be some federal official. I know there's the --
 7 what's the name of the family compliance office or
 8 something like that that may have a view? But there's
 9 a threat of loss of federal funds as well as
 10 violation. I've never heard of it occurring, but this
 11 has been in place since the '70s. And I'm sure
 12 there's been changes over time. I think clarity -- I
 13 think sitting down, if nothing else, in a loss saying,
 14 you know, some group needs to make a recommendation or
 15 a thought on this. I couldn't do it here.
 16 Q. Sure.
 17 A. I do have some views about releasing
 18 information, but it's -- maybe we'll get to that at
 19 the end.
 20 Q. No, go ahead. We may as well go there
 21 now. I do want to hear your views on releasing
 22 information.
 23 A. This -- and some of this may not be
 24 legal, but I would test the limits. We don't normally
 25 receive reports from psychologists or therapists or

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1 counselors who may or may not be -- well, I'm sure
 2 they're dealing with troubled kids, Karl -- I mean, we
 3 have threats that I review, which is another -- going
 4 to be another one of my recommendations if you ask me
 5 on that, that are far more direct and worse.
 6 But why is it that we let a child -- I'm
 7 not going to put it in a question. I believe when a
 8 child comes back to school and has done a serious
 9 thing, we need to have something that -- I mean, heck,
 10 when a doctor comes back and the kid has had some form
 11 of whooping cough, if you will, you know, you don't
 12 come back into school with that. So why can we not at
 13 least get some indication that the kid is okay, don't
 14 worry about it. We can put students on a 24-hour or
 15 72-hour -- but I would say 99 percent of those, the
 16 police just give back, We saw them, we didn't see
 17 anything, they're yours again.
 18 So what do we -- I don't have the direct
 19 answer, but I sure would like to get something, and
 20 I'm not so sure that there aren't institutions in our
 21 business that say, You're not coming back in our doors
 22 until we get some assurance for -- you're going to go
 23 get help and we get some assurance before you walk
 24 into the building. Not that it will prevent anything.
 25 I understand that, but it's just one -- it's a

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1 psychological barrier, I mean, concept for people but
 2 it's also -- it's real for us.
 3 Q. Well, let me ask you, why didn't you
 4 implement a policy like that while you were
 5 superintendent at Littleton Public Schools that if a
 6 kid had a serious psychological concern, that that
 7 student wouldn't be allowed back into school unless
 8 some third-party professional had cleared that student
 9 from a mental health perspective?
 10 A. That's a great question. It's one I
 11 don't deal with normally.
 12 Q. But my question, though, is why didn't
 13 you implement such a policy?
 14 A. It never was recommended to me. I never
 15 really thought about it in this way. I don't think I
 16 ever came about against anything like this in my own
 17 -- I'm sure -- I'm sure my immediate staff and their
 18 staff had in some way before, but sometimes in a role
 19 as a CEO, you have people that take care of certain
 20 things, and when those issues happen, they come
 21 forward to me and say, Scott, I think we need to do
 22 this. Now, if they have some reason not to, they
 23 would probably take care of that.
 24 (At this time Ms. Davis left the room.)
 25 Q. Okay. Now, let me ask it in a slightly

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1 **different way. None of your staff came forward with**
 2 **that as a recommendation to you, correct?**
 3 A. No.
 4 **Q. To implement a policy like that?**
 5 A. No.
 6 **Q. But now, having lived through what you**
 7 **lived through, is that a policy that you would**
 8 **recommend to your successor sitting down the table**
 9 **from you?**
 10 A. I would say, If you can get this through,
 11 somebody legally interpreted, and I don't know what
 12 the criteria is, but I don't want a kid walking back
 13 into my building that's on the edge. And right now we
 14 take everybody that's on the edge. In certain
 15 circumstances, we may recommend them out for services.
 16 First thing I always think about is the kids with
 17 IEP's and special ed, they're classified with
 18 emotional disorder. But there are other kids, Karl
 19 was one of them. We've got another -- we've got kids
 20 that -- I'm talking too much.
 21 We have kids at other schools. I have
 22 one that has a diary at another high school that said
 23 specifically what he is going to do to the girlfriend.
 24 My staff couldn't get through the fifth page of his
 25 diary, and then what he wrote to her. The exact

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1 weapon, the exact time, and the terrible acts that
 2 he's going to -- I mean, what are these kids -- these
 3 kids need help. These kids shouldn't be back in our
 4 schools without some sort of clearance.
 5 My next fear after that, so what if we
 6 get clearance? Is it valid? Who is going to be held
 7 accountable and responsible if we're told, Nah, that's
 8 just the way that child is and they'll be okay; or
 9 will they show up with their attorney and say, Look,
 10 we want an IEP, a special ed, or we want to -- you
 11 don't have the right to hold my child out. I'd rather
 12 have them come with their attorney and law enforcement
 13 and say, Let my kid in and stand at the door. I'm
 14 sorry.
 15 **Q. It's all right.**
 16 A. I'm fairly strong about this one.
 17 **Q. Well, that's why I wanted to hear what**
 18 **your thoughts were.**
 19 A. I've heard of one district, but I don't
 20 know if it may just be a rumor. And I think they're
 21 bordering, but they will never challenge that
 22 district. It's Jefferson County after Columbine. I
 23 don't know what circumstances they do it, but I sure
 24 wanted to find out more about it.
 25 **Q. And what did you find out about it?**

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1 A. I haven't. I've heard it late.
 2 **Q. All right.**
 3 A. I was pushing the envelope a little bit,
 4 just seeing if people did that and it -- frankly, it
 5 made sense to me. Now, I know there is a judgment
 6 call that has to be made, Can I really keep them out?
 7 But, I mean, just the very act that you have to
 8 produce something as a parent or somebody else, I
 9 would hope, not all parents, say, I've got to take
 10 this really seriously.
 11 **Q. Okay. Let's switch gears. Are you on**
 12 **Exhibit 61 still?**
 13 A. Yes.
 14 **Q. It's the January 23 letter?**
 15 A. Yes.
 16 **Q. One of the things that you report to the**
 17 **Littleton parents and staff is that "We" -- LPS --**
 18 **"are working closely with and fully cooperating with**
 19 **Arapahoe County Sheriff Grayson Robinson and his staff**
 20 **as they continue their active investigation," right?**
 21 **(At this time Ms. Davis entered the**
 22 **room.)**
 23 A. Yes.
 24 **Q. And that was important, because of among**
 25 **other things, that was integral to learning from our**

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1 **past, which we just covered in your last letter,**
 2 **right?**
 3 A. Okay.
 4 **Q. Don't you agree?**
 5 A. I think so. I'm waiting to see what the
 6 next question is.
 7 **Q. Sure. Well, my next question is, the**
 8 **only way that the sheriff could do a thorough**
 9 **investigation is if Littleton Public Schools and all**
 10 **of its employee were fully cooperative and transparent**
 11 **with the sheriff; isn't that right?**
 12 A. Yes.
 13 **(Deposition Exhibit 62 was marked.)**
 14 **Q. Now, Exhibit 62 is a progress report from**
 15 **a Sergeant Hoffman describing some conversations that**
 16 **he had the day after the shooting. Do you see that?**
 17 A. Yes.
 18 **Q. Have you seen this document before?**
 19 A. I don't recall this document.
 20 **Q. Well, you'll see that this document**
 21 **describes the sheriff's department's efforts to get**
 22 **its hands on Karl Pierson's Littleton High School's**
 23 **records, right?**
 24 A. That's the first paragraph?
 25 **Q. Yes.**

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1 A. Okay. Yes.

2 **Q. And in the first paragraph the**

3 **investigator says, initially, the records were**

4 **believed to be kept at the high school administration**

5 **area but that they had been turned over to Darryl**

6 **Farrington, right?**

7 A. Okay.

8 **Q. And when that investigator called**

9 **Mr. Farrington, and explained -- and now I'm down to**

10 **the third paragraph. When that investigator called**

11 **Mr. Farrington, to explain that those documents were**

12 **important in the furtherance of the sheriff's**

13 **investigation, he reported that he didn't have any of**

14 **those documents; is that right?**

15 A. I don't know. May I read this for just a

16 minute?

17 **Q. Yes, of course.**

18 A. Okay.

19 **Q. So I'm just trying to understand the**

20 **sequence of events here.**

21 A. Okay.

22 **Q. So first, are you familiar with having**

23 **reviewed this document -- are you familiar with this**

24 **sequence of events related to the confusion about**

25 **getting the school's or the district's file on Karl**

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1 **Pierson over to the sheriff's office?**

2 A. No. I knew there was some confusion, but

3 they received it.

4 **Q. Yes. But here's what I'm trying to**

5 **figure out. At 12:30 on December 14, Sergeant Hoffman**

6 **tried to reach out to Darryl Farrington to get Karl**

7 **Pierson's high school records, right?**

8 A. That's what it says, yes.

9 **Q. And about 20 minutes later, or a half an**

10 **hour later, Mr. Farrington called the investigator and**

11 **said, I don't have the records on Karl Pierson, right?**

12 A. That's what this says.

13 **Q. And the investigator felt strongly enough**

14 **about what was going on that he explained to**

15 **Mr. Farrington that his unwillingness to cooperate**

16 **constituted a potential obstruction of our criminal**

17 **investigation. Do you see that?**

18 A. Yes.

19 **Q. And ten minutes after making that**

20 **threat --**

21 A. Mr. Hoffman making the threat?

22 **Q. Yes.**

23 A. Okay.

24 **Q. Sergeant Hoffman making that threat.**

25 A. Sergeant.

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1 **Q. The file appeared in Darrell Meredith's**

2 **office. Do you see that?**

3 A. Uh-huh.

4 **Q. And then if you look to the second page**

5 **of Exhibit 62, there's a discussion of one of the LPS**

6 **supervisors making copies of records that were located**

7 **in Darrell Meredith's office, right?**

8 A. Okay.

9 **Q. Do you see that?**

10 A. Yeah. Okay.

11 **Q. And the sergeant asked where the**

12 **documentation about the threat assessment was,**

13 **correct?**

14 A. It appears that way, yes. Go on.

15 **Q. And even though Karl Pierson's file was**

16 **in Darrell Meredith's office, the threat assessment**

17 **wasn't in that file according to this document, right?**

18 A. According to this document, it wasn't in

19 Mr. Meredith's --

20 **Q. Files. Right.**

21 A. Okay.

22 **Q. So what we have based on all of that is**

23 **-- and I understand it's a little confusing, because**

24 **both of these gentlemen have the first name Darrell.**

25 **Darryl Farrington had told the sergeant, I don't have**

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1 **any files at all, right?**

2 A. Right. That's what this says, yes.

3 **Q. And he says, No, they're all -- what**

4 **Mr. Farrington said is, No, the files are in**

5 **Mr. Meredith's office, right?**

6 A. Okay.

7 **Q. And when they went to get the file from**

8 **Mr. Meredith's office, the threat assessment wasn't in**

9 **that file, correct?**

10 A. That's what this says, yes.

11 **Q. And is that consistent with your**

12 **recollection?**

13 A. No. Frankly, I don't recall -- I have a

14 recollection of some of this but not the detail of who

15 did what and when.

16 **Q. And then if you follow on through this**

17 **document to the next paragraph, sometime thereafter,**

18 **another investigator Gwaltney called Sergeant Hoffman**

19 **and advised that she had just been given the threat**

20 **assessment by Dan Maas, your CIO, right?**

21 A. Yes, chief information officer.

22 **Q. Who stated that he had obtained that**

23 **threat assessment from Mr. Farrington. Do you see**

24 **that?**

25 A. Yes.

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1 **Q. So my question for starters, is that**
 2 **consistent with your recollection?**
 3 A. No, it's not.
 4 **Q. What is your recollection --**
 5 A. I don't have one of the pieces. I have a
 6 recollection on the threat assessment that they needed
 7 it. Dan Maas was involved in some way. I don't
 8 recall exactly getting this, and it was delivered to
 9 them as quickly as possible if they needed it because
 10 they thought it was missing. I remember there was
 11 some conversation about that, and later on in the
 12 reports they said, you know, We didn't receive that.
 13 And I said, Yes, we did receive that. Yes, you did
 14 receive that. But the sequence of how it got there,
 15 it happened relatively quickly.
 16 **Q. This all appears to have happened in the**
 17 **same day.**
 18 A. Okay. I thought it was a couple days but
 19 okay.
 20 **Q. I'll ask your recollection, was it all**
 21 **the same day?**
 22 A. That's what I thought, within a 24-hour
 23 period, whether it crossed two days or whatever but
 24 yeah.
 25 **Q. Well, let me ask real directly. Was the**

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1 **threat assessment document removed from Karl Pierson's**
 2 **file at Littleton Public Schools at any time for any**
 3 **reason by any person?**
 4 A. I have no knowledge of that. I have a
 5 knowledge of it being delivered, but that's it. Some
 6 of this doesn't make sense to me, and I don't know,
 7 you know, how -- whether anybody challenged or talked
 8 to -- I mean, I don't know. There would be no reason
 9 not to do that. This was a critical part of
 10 investigation.
 11 **Q. Right. And that's why I'm confused by**
 12 **this. That's why I asked, was that threat assessment**
 13 **removed from the file for any reason by anyone at any**
 14 **time?**
 15 A. Not that I'm aware of with one possible
 16 exception.
 17 **Q. Tell me about that exception.**
 18 A. Again, you're going to have to take it
 19 for --
 20 **Q. Understood.**
 21 A. What I thought occurred, I know there was
 22 some confusion, is that one of our staff went over to
 23 Kevin Kolasa, I thought it was Kevin Kolasa, not
 24 Darrell Meredith's, went over and looked and saw a
 25 file and brought it back to the ESC. Now, what

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1 happened from that point, I don't know. That was my
 2 -- that was Melissa Cooper, who did that to get it
 3 back over, and from that point, I don't know if she
 4 gave it -- I don't know what happened to it at that
 5 point. I do know that it got in the hands within a
 6 period of time and what they needed. And, like I
 7 said, there is no reason for it not to.
 8 (Deposition Exhibit 63 was marked.)
 9 **Q. Exhibit 63 is another progress report**
 10 **from the Arapahoe Sheriff's Investigator, Kristin**
 11 **McCauley.**
 12 A. Okay.
 13 **Q. And it describes a meeting that you**
 14 **attended, along with Mr. Everall and District Attorney**
 15 **George Brauchler and some other investigators. Do you**
 16 **see that?**
 17 A. Yes.
 18 **Q. Do you recall that meeting?**
 19 A. Yes.
 20 **Q. Do you recall what the purpose of the**
 21 **meeting was?**
 22 A. Yes.
 23 **Q. Was it to -- well, what was the purpose**
 24 **of the meeting?**
 25 A. The purpose, as I recall, was to discuss

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1 items they felt like they had not given -- been able
 2 to receive. And I remember that Kristin McCauley
 3 provided a list of those. This may be the same list,
 4 but she provided a list. And then those were -- went
 5 through one by one. In that meeting was District
 6 Attorney Darryl -- not Darryl, sorry. George
 7 Brauchler, his assistant -- oh, here they are. His
 8 assistant. I believe Mark was the assistant district
 9 attorney. The investigator, I didn't know his name,
 10 the Jeff Himes and Kristin McCauley, myself, and Steve
 11 Everall.
 12 **Q. All right. And in that meeting with**
 13 **Mr. Brauchler and the others, there was a discussion**
 14 **of the fact that Karl's file was taken out of Kevin**
 15 **Kolasa's office by another person and placed in**
 16 **Darrell Meredith's office. That's in the second full**
 17 **paragraph. Do you see that?**
 18 A. Darrell Meredith or Darryl Farrington?
 19 **Q. Darrell Meredith's office. Do you see**
 20 **that?**
 21 A. I'm going down and looking.
 22 **Q. Sure. It's right here.**
 23 A. Okay. Second paragraph.
 24 **Q. All right. And my question to you is, do**
 25 **you recall Karl Pierson's file being taken out of**

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1 **Kevin Kolasa's office by another person and being**
 2 **placed in Darrell Meredith's office?**
 3 A. No, I do not.
 4 **Q. Do you have any understanding of who**
 5 **removed the Karl Pierson file from Kevin Kolasa's**
 6 **office and placed it in Darrell Meredith's office?**
 7 A. No, I do not.
 8 **Q. Do you have any understanding of why that**
 9 **occurred?**
 10 A. No.
 11 **Q. And you will see later in this same**
 12 **paragraph, Investigator McCauley explaining that the**
 13 **file that was ultimately retrieved was incomplete when**
 14 **Sergeant Hoffman arrived at the school district**
 15 **office. Do you see that? Same paragraph.**
 16 A. Okay.
 17 **Q. Do you see that?**
 18 A. Yes, second sentence from the end of the
 19 paragraph.
 20 **Q. Yes. Is that consistent with your**
 21 **recollection? Was the file that was retrieved by**
 22 **Sergeant Hoffman at the district office incomplete**
 23 **when he got it?**
 24 A. No, that's not my understanding. In
 25 fact, I don't know if that's accurate in what they

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1 were looking for.
 2 **Q. Well, I think what Sergeant Hoffman or**
 3 **Investigator McCauley is referring to there is the**
 4 **fact that the threat assessment document itself wasn't**
 5 **in that file.**
 6 A. By her saying that it was incomplete?
 7 **Q. Yes.**
 8 A. I don't understand why it would be
 9 incomplete if it had the threat assessment in it.
 10 **Q. The point is, it did not have the threat**
 11 **assessment in it. That's my understanding. And I'll**
 12 **direct your attention to the very next sentence where**
 13 **Investigator McCauley explains that eventually the**
 14 **threat assessment was found to be with Darryl**
 15 **Farrington, not with Darrell Meredith. Do you see**
 16 **that?**
 17 A. Right.
 18 **Q. Is that --**
 19 A. Is there a mistake? I'm asking the
 20 question, sorry.
 21 **Q. Well, my question is, why is there so**
 22 **much confusion about where this threat assessment**
 23 **document was? Why wasn't it just sitting in the Karl**
 24 **Pierson file?**
 25 A. I don't know. My assumption would be if

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1 Kevin Kolasa was doing it or Esther Song, there should
 2 be a file there, unless it was scanned in
 3 electronically. I didn't know enough about this but
 4 -- and it would be there or somebody would have gotten
 5 it to bring back, and that would have been that.
 6 Whether it was with Darryl Farrington, I don't know.
 7 I could see where somebody might pull it and say,
 8 Darryl, here is what we have. We've got the
 9 investigation going, we have a subpoena, blah, blah,
 10 blah. But I don't see any reason why it wouldn't just
 11 be -- you asked me was there any reason, I don't see
 12 any reason why it wouldn't have been brought back.
 13 **Q. And that's exactly what I'm trying to get**
 14 **to the bottom of, is why was Karl Pierson's file in**
 15 **one place and the threat assessment somewhere else,**
 16 **and was that your understanding of how this all played**
 17 **out?**
 18 A. No. My understanding was that there was
 19 a file over at Arapahoe High School and it was brought
 20 back -- Dan Maas had some piece of it, and I don't
 21 know if his was the electronic contact log or behavior
 22 log. And I don't know what's being referred to is --
 23 there's that piece of information, there's Darryl
 24 Farrington, we consider that a file, even though
 25 they're in two different -- how do you get that

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1 together or if they were looking for some paper notes,
 2 and I think everything was on the contact log or the
 3 electronic behavior log, plus the threat assessment.
 4 That's what I know.
 5 **Q. All right. After you all discussed how**
 6 **the threat assessment came to be in the possession of**
 7 **the sheriff's office, which by this point it was,**
 8 **along with the remainder of Karl Pierson's file,**
 9 **right?**
 10 A. Yeah, if I could correct just a moment
 11 here?
 12 **Q. Yes.**
 13 A. I didn't have a lot of conversation about
 14 this. I knew there was confusion. And I said, Just
 15 get the thing to the sheriff, or if my staff felt it
 16 had to go to Darryl Farrington for some reason that I
 17 don't deal with for privacy or for what they believed
 18 was FERPA or anything else, but go ahead and get this
 19 file to who needs it. It was kind of a nonissue for
 20 me because there is no reason why it shouldn't have.
 21 **Q. And then after that, the discussion moved**
 22 **to a list of items that Kristin McCauley thought might**
 23 **be missing from the records that were the subject of**
 24 **the search warrant, right?**
 25 A. Yes.

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1 **Q. And there's a list of nine different**
 2 **things as I read this, right?**
 3 A. Right.
 4 **Q. The first refers to a meeting between**
 5 **Karl and his school counselor Astrid Thurnau on**
 6 **September 26. And Investigator McCauley wanted to be**
 7 **sure that she had any reports concerning -- or any**
 8 **notes concerning that meeting, right?**
 9 A. Yes.
 10 **Q. Did you produce any such reports or notes**
 11 **to Investigator McCauley of that meeting?**
 12 A. I believe the notes were produced for her
 13 and they were in the contact log. She may have been
 14 looking for some sort of written document. I remember
 15 there was some confusion, but the notes that come from
 16 the counselor, as far as I know, go on the student
 17 contact or the behavior incident, I think they call
 18 them that. So those would have been in the notes.
 19 **Q. All right. The next item asks for any**
 20 **additional information concerning a November 2011**
 21 **incident involving Karl Pierson in Mrs. Price's class,**
 22 **right?**
 23 A. Right.
 24 **Q. And it was explained to Investigator**
 25 **McCauley that there was no documentation beyond what**

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1 **she already had received, right?**
 2 A. That's what it says, yeah.
 3 **Q. The third item relates to the suspension**
 4 **paperwork for the March suspension that was levied**
 5 **against Karl Pierson in 2013?**
 6 A. Yes. Am I on the right one?
 7 **Q. No. 3.**
 8 A. Right.
 9 **Q. And do you recall -- did LPS provide any**
 10 **additional information or documents to Investigator**
 11 **McCauley on that subject?**
 12 A. I believe so. I think it was either in
 13 the behavior incident or the contact record.
 14 **Q. Okay.**
 15 A. No, I'm thinking of the wrong -- no.
 16 March, that's the one with Dan Swomley?
 17 **Q. Yes.**
 18 A. That's -- I believe -- I won't swear to
 19 it, but I believe it's in the contact log. I would
 20 have to go back and look.
 21 **Q. All right. And the fourth item concerns**
 22 **Tracy Murphy's -- essentially his performance**
 23 **evaluations?**
 24 A. Yes.
 25 **Q. And, actually, just to help you out, at**

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1 **the end of this is the resolution. I should have**
 2 **started with that. At the end of this exhibit is a**
 3 **discussion of how each of these items was resolved.**
 4 **So I apologize for that.**
 5 A. No, that's fine.
 6 **Q. And as I understand it, the discussion**
 7 **was that teachers weren't evaluated every single year.**
 8 **You can go ahead to the last page and you'll see what**
 9 **I'm referring to.**
 10 A. I did. I'm back to No. 3 -- or No. 4,
 11 excuse me.
 12 **Q. All right. Well, let's go back to No. 3.**
 13 **On No. 3 that's the March suspension, right?**
 14 A. Yes.
 15 **Q. And Investigator McCauley said, I don't**
 16 **think I've got all the paperwork on that March**
 17 **suspension, right?**
 18 A. Right.
 19 **Q. And as you move through this exhibit,**
 20 **what happened at this meeting was LPS provided**
 21 **Investigator McCauley with a statement that Karl had**
 22 **written relating to that March 2013 incident, right?**
 23 A. Okay.
 24 **Q. Do you see that at the end of Exhibit 63?**
 25 A. At the end?

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1 **Q. Yes, where it talks about for item 3.**
 2 A. Oh, the last page?
 3 **Q. Yes.**
 4 A. Yes.
 5 **Q. So Investigator McCauley, who had already**
 6 **received the school's file on Karl Pierson, saw that**
 7 **there had been a suspension in March of 2013 and was**
 8 **concerned she hadn't received everything on that**
 9 **incident, right?**
 10 A. That's what she said, yes.
 11 **Q. And so at this meeting in late January,**
 12 **she was provided with what turned out to be a**
 13 **handwritten statement that Karl Pierson completed**
 14 **concerning that incident, right?**
 15 A. Yes.
 16 **Q. Okay.**
 17 A. Well, I learned that later on down the
 18 road.
 19 **Q. Well, you learned that at this meeting,**
 20 **right?**
 21 A. Yeah.
 22 **Q. Because that's when she got this --**
 23 A. Yeah, at this point later on down the
 24 road from the beginning when we were looking at this.
 25 Yeah.

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1 **Q. Yes. So here is my question. Given that**
 2 **back on December 14 there was a big discussion about**
 3 **whether or not LPS had produced Karl Pierson's file to**
 4 **the investigators, why more than a month later is the**
 5 **school just producing this handwritten statement from**
 6 **Karl Pierson to the investigators?**
 7 A. I don't know.
 8 **Q. Where was that handwritten statement by**
 9 **Karl if not in the file that was in Mr. Meredith's**
 10 **office?**
 11 A. I don't know. I assume there was
 12 something in the contact log or the incident log. I
 13 don't know about -- you're talking about a handwritten
 14 document?
 15 **Q. Absolutely.**
 16 A. And it's probably the one that I saw
 17 later on.
 18 **Q. Yeah, it's The Ides of March statement.**
 19 A. Yeah, that one.
 20 **Q. And my question is, when the file was**
 21 **produced in December to the investigators, why wasn't**
 22 **that Ides of March document produced along with**
 23 **everything else?**
 24 A. I don't know.
 25 **Q. Was it removed from the file at some**

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1 **point by some person?**
 2 A. Not that I'm aware of. Again, I don't
 3 know anything about this other than I saw it later and
 4 saw The Ides of March and something about why am I
 5 being picked off, it's my first time, or something
 6 like that.
 7 **Q. Right. Okay. We covered No. 4. Let's**
 8 **talk about No. 5, which is an incident involving**
 9 **Michelle Crookham and the weird German band name. Do**
 10 **you see that?**
 11 A. Yes.
 12 **Q. You learned at this meeting, or maybe**
 13 **beforehand, that this incident troubled Ms. Crookham**
 14 **enough that she brought it to Kevin Kolasa, the**
 15 **assistant principal?**
 16 A. Yes.
 17 **Q. And once again, Kevin's response was, It**
 18 **was probably nothing. Do you see that there, the very**
 19 **bottom of the first page?**
 20 A. Oh, no, the second -- okay. I've got it.
 21 Yes.
 22 **Q. Did it trouble you that, once again,**
 23 **Kevin Kolasa's response to a questionable behavior by**
 24 **Karl Pierson was, Oh, it's probably nothing?**
 25 A. Yes.

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1 **Q. Did you talk to him about it after this**
 2 **meeting?**
 3 A. To Kevin?
 4 **Q. Yes.**
 5 A. No, not about this, no. And, actually,
 6 as I referred to later, my conversation with Kevin was
 7 the ones I referenced.
 8 **Q. All right.**
 9 A. And I had never heard this until we went
 10 through this and learned a little bit more about it,
 11 which concerned me even more once I learned about it.
 12 **Q. The sixth item on this list concerns the**
 13 **incident in Vicki Lombardi's class. Do you see that?**
 14 A. Yes.
 15 **Q. And a discussion that Vicki Lombardi told**
 16 **Kevin Kolasa at least twice that Karl had scared her,**
 17 **right?**
 18 A. Okay.
 19 **Q. Was this meeting the first time that you**
 20 **heard about this Vicki Lombardi incident?**
 21 A. Yes.
 22 **Q. And it was the first time that you**
 23 **learned Ms. Lombardi had told Kevin Kolasa that Karl**
 24 **scared her?**
 25 A. Yes. I heard those terms, yeah.

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1 **Q. And Investigator McCauley wanted any**
 2 **notes that Kevin Kolasa had of that incident, right?**
 3 A. Yes.
 4 **Q. So let's look at item 6 on the last page.**
 5 A. Oh, okay.
 6 **Q. And in No. 6, LPS reported to Kevin**
 7 **Kolasa -- or reported to the investigator that Kevin**
 8 **Kolasa said he did not have any other documentation on**
 9 **this incident, right?**
 10 A. Am I in the right one? No. 6?
 11 **Q. Yes.**
 12 A. "Stephen advised that he spoke with
 13 Kevin, who stated that Vicki never told him that she
 14 was scared of Karl. Kevin also stated that he does
 15 not have any other documentation on the incident."
 16 Yes, I see that.
 17 **Q. And so as a result of that, LPS did not**
 18 **produce any additional documents or notes about that**
 19 **incident to the investigators, did it?**
 20 A. To the best of my knowledge, no, unless
 21 there was some.
 22 **Q. Do you know whether or not LPS produced**
 23 **any additional notes on that?**
 24 A. I don't recall any. I'm sorry, I didn't
 25 keep notes on this because I probably would have

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1 answered the questions better. Steve was there,
 2 Stephen.
 3 **Q. That's all right. And the reason I ask**
 4 **is because, as part of this arbitration, Kevin**
 5 **Kolasa's handwritten notes of that incident were**
 6 **produced.**
 7 (At this time Ms. Bouwman left the room.)
 8 A. They were?
 9 **Q. Yes. So my question is, why weren't**
 10 **those given to the sheriff's office?**
 11 A. I don't know. Unless --
 12 MR. EVERALL: They were. I sent them to
 13 you in a letter following this up.
 14 MR. ROCHE: Okay. Very good. Fair
 15 enough.
 16 **Q. (BY MR. ROCHE) Let's talk about --**
 17 MR. EVERALL: And if you want, we can
 18 talk about the threat assessment thing off the record.
 19 MR. ROCHE: Why don't we do that.
 20 MR. EVERALL: And then we can figure out
 21 if it is important to you to get them --
 22 MR. ROCHE: All right. Let's talk about
 23 that during a break.
 24 **Q. (BY MR. ROCHE) All right. Let's move on**
 25 **to the seventh item on this list, and the seventh item**

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1 **describes a discussion between Investigator McCauley**
 2 **and Kevin Kolasa about the Karl Pierson file that**
 3 **Kevin Kolasa had, right?**
 4 A. Uh-huh.
 5 **Q. And Mr. Kolasa advised Ms. McCauley that**
 6 **he did have Karl Pierson's written statement from the**
 7 **incident that occurred on December 11 when he got**
 8 **kicked out of Spanish class by Vicki Lombardi, right?**
 9 A. Yes, that's what it says.
 10 **Q. Okay. Do you recall whether or not Karl**
 11 **Pierson's handwritten statement concerning the**
 12 **December 11 incident was included in the files that**
 13 **LPS produced to the sheriff back in the day after the**
 14 **shooting?**
 15 A. No, I don't recall. Actually, I don't
 16 know of it, because I never saw that file.
 17 **Q. All right.**
 18 A. I'm not sure it's -- my concern all along
 19 is when I heard about the threat assessment, Get the
 20 threat assessment to whoever needs it and anything
 21 else.
 22 **Q. All right.**
 23 A. This -- go ahead, and then I'll say --
 24 **Q. The eighth item -- well, let's -- well,**
 25 **on item 7, there's a discussion of the fact that**

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1 **Deputy Englert saw a file labeled Karl Pierson in**
 2 **Kevin Kolasa's briefcase sometime in early January of**
 3 **2014, right?**
 4 A. Yes.
 5 **Q. And if we look ahead to the resolution on**
 6 **that item, it's indicated that Kevin started that file**
 7 **after the shooting and LPS said, We'll get that to**
 8 **you, to the sheriff's office, right?**
 9 A. I don't know.
 10 **Q. I'm on item No. 7.**
 11 A. Right. I'm looking at it. Stephen said
 12 that he would get the sheriff's office what was in it.
 13 (At this time Mr. Davis left the room.)
 14 **Q. All right.**
 15 A. My understanding recently is that was a
 16 copy, it was in some folder that was a copy of what
 17 was in the file. I don't know that. I never saw it
 18 or had any conversation with them about it.
 19 **Q. Did you ever ask Kevin Kolasa why he**
 20 **started a Karl Pierson file after the shooting?**
 21 A. No, I didn't ask him anything.
 22 Everything from that point in time as the sequence of
 23 events was with the sheriff. I knew very little
 24 immediately of Kevin's role, period, and began to
 25 learn that through the year.

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1 **Q. All right.**
 2 A. I might add, this meeting started a
 3 little tense like something was being withheld. And
 4 what I said at the very beginning of this meeting, If
 5 there is anything that's being -- not even withheld,
 6 not available to you, tell us, we'll get it to you.
 7 And then we went through, and some of these were not
 8 accurate, as I understand it, or things were provided
 9 to them. But if there was one thing on here, it was
 10 not a problem for me to say, I'll get it to you. In
 11 fact, if you would ask them, I think that would be --
 12 that I was very cooperative.
 13 **Q. Okay.**
 14 A. As we should be.
 15 **Q. Agreed. The eighth item on the list is**
 16 **the suspension paperwork concerning the March 2013**
 17 **incident, right?**
 18 A. That's what --
 19 **Q. And it says the suspension paperwork is**
 20 **there but none of the -- no other document, including**
 21 **teachers' notes or documentation concerning what**
 22 **actually led to the suspension. Do you see that?**
 23 A. Yes.
 24 **Q. And for some reason in the progress**
 25 **report, there is no mention of item No. 8. Do you**

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1 **know why that might be?**
 2 A. What progress report? From the sheriff
 3 or from --
 4 **Q. What we're looking at. The last page of**
 5 **this exhibit.**
 6 A. No. I remember a slight discussion about
 7 it.
 8 **Q. Tell me about that discussion.**
 9 A. It was in general. And there seemed to
 10 be an impression from my -- from what I was
 11 understanding, and I wish she was here, is that
 12 teachers are somewhat like officers of a sheriff's
 13 department. So when they have interactions with
 14 students, one way or another, they're taking notes and
 15 filing and putting them in there. And I said, In our
 16 business, that's not the way things occur. When
 17 they're serious, they should be that way, but there's
 18 instances when somebody blows off in a hallway or at
 19 some event and they don't carry a book. And she kind
 20 of looked curiously at me as if it is a ticket we
 21 should be writing, and we don't do things that way.
 22 But if there was something serious that should have
 23 been documented, then it should have been documented.
 24 **Q. And then the final item on Investigator**
 25 **McCauley's list concerns the threat assessment, right?**

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1 A. Okay.
 2 **Q. What Investigator McCauley was asking you**
 3 **for were any of Ms. Song's documentation concerning**
 4 **that threat assessment or any documentation from Kevin**
 5 **Kolasa regarding the meeting on September 6, 2013. Do**
 6 **you see that?**
 7 A. Yes.
 8 **Q. Do you recall, did Littleton Public**
 9 **Schools produce any notes or other documents from**
 10 **Kevin Kolasa or Esther Song concerning the threat**
 11 **assessment itself or the reentry meeting on**
 12 **September 6, 2013?**
 13 A. Yes, I believe they did.
 14 **Q. Okay.**
 15 A. And that was in their contact log where
 16 they write things and the behavior incident log. And
 17 then there's the handwritten one, which is the actual,
 18 what I consider, the screening document, the threat
 19 assessment document.
 20 **Q. Right. And that's what we've been**
 21 **referring to here as the threat assessment document.**
 22 A. Right. Right.
 23 **Q. So there's the contact log and the**
 24 **behavior detail report.**
 25 A. Yes. Yes. That's what I understood.

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1 **Q. Do you recall whether or not any other**
 2 **memos, notes, handwritten or otherwise, from**
 3 **Mr. Kolasa or Dr. Song were ever produced to the**
 4 **sheriff?**
 5 A. No, not only do I not recall it, I didn't
 6 know of anything. I learned this process as I went
 7 along.
 8 **Q. Okay. In the next paragraph -- and we're**
 9 **now through all nine of those incidents.**
 10 A. Are we on page 2 or 3?
 11 **Q. We're on page 2, Investigator McCauley**
 12 **has written, "My understanding is that when a teacher**
 13 **has a concern regarding a student that they do a**
 14 **referral on the student." Do you see that?**
 15 A. Yes.
 16 **Q. And Investigator McCauley goes on to**
 17 **explain that "Ms. Crookham apparently did a referral**
 18 **on Karl, but there is not any documentation of the**
 19 **referral or any other referrals from Karl's teachers,**
 20 **however we have been informed by several people that**
 21 **there were several referrals done on Karl, due to his**
 22 **behavior, by his teachers." Do you see that?**
 23 A. Yes.
 24 **Q. What do you recall about the decision of**
 25 **whether or not there had been several referrals,**

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1 **including Ms. Crookham's, done on Karl Pierson because**
 2 **of behavioral concerns?**
 3 A. I had no discussion about it, so I have
 4 no recollection other than this meeting when that was
 5 brought up.
 6 **Q. And that's what I'm asking about. In**
 7 **this meeting, tell me about the discussion.**
 8 A. I remember it being stated. Just briefly
 9 looking at it again, I don't agree -- I don't think
 10 that's accurate, and I may be picking on the issue
 11 about it here, but when a teacher has a concern
 12 regarding a student, I think it depends on where that
 13 is. They don't do a referral on everything, and
 14 Kristin McCauley, we talked about, they don't make
 15 like a ticket on everybody.
 16 **Q. Understood. But let me be more specific.**
 17 **What do you recall about whether or not Michelle**
 18 **Crookham or any other teachers had actually written**
 19 **referrals on Karl Pierson?**
 20 A. I don't have any recollection. I don't
 21 have any recollection on that. I have the outcome,
 22 but I don't know what they actually wrote or turned
 23 in. Like the March incident, I saw that.
 24 **Q. Well, do you believe that Investigator**
 25 **McCauley is simply wrong in her understanding that**

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1 **several teachers had written referrals on Karl**
 2 **Pierson?**
 3 A. No, I don't believe she is wrong. I
 4 don't have any information on it other than what she
 5 said, and I tend to go with what people said. She was
 6 the investigator.
 7 **Q. But you've seen those referrals?**
 8 A. No.
 9 **Q. All right. Do you know whether or not --**
 10 A. I don't even know what they look like. I
 11 assume what she is talking about is something that
 12 might have been on a piece of paper or e-mail.
 13 **Q. Right. Do you know --**
 14 A. Which might be an area for improvement or
 15 something to be in there, a formal thing that they
 16 would do.
 17 MR. ROCHE: All right. Go ahead and mark
 18 this as Exhibit 64.
 19 (Deposition Exhibit 64 was marked.)
 20 A. Can I take a five-minute break?
 21 **Q. (BY MR. ROCHE) Sure.**
 22 **(Recess taken, 3:37 p.m. to 3:50 p.m.,**
 23 **after which time Mr. Davis was present.)**
 24 **Q. (BY MR. ROCHE) Exhibit 64 is a Research**
 25 **Proposal to Study the Arapahoe High School Shooting by**

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1 **the University of Colorado-Boulder's Center for the**
 2 **Study and Prevention of Violence. You can see that**
 3 **one of the authors of this proposal is sitting at the**
 4 **end of the table, Bill Woodward, right?**
 5 A. Now I know that's Bill. I wasn't sure.
 6 I thought so.
 7 **Q. Well, my first question is, have you seen**
 8 **Exhibit 64 before?**
 9 A. I saw a version of it.
 10 **Q. All right. And Exhibit 64 is exactly**
 11 **what its title suggests, which is a proposal to**
 12 **research and study the Arapahoe High School shooting,**
 13 **right?**
 14 A. Yes.
 15 **Q. And in the version that you saw, you**
 16 **understood that the purpose of this research was to --**
 17 **I'm reading from the middle of the first paragraph,**
 18 **"To better understand Pierson's motivations and how**
 19 **similar school shootings might be prevented," right?**
 20 A. Yes.
 21 **Q. And this was a research proposal that the**
 22 **Arapahoe County Sheriff's Office approached CU and**
 23 **asked them if they would be interested in doing. You**
 24 **understood that?**
 25 A. Yes. Actually, I didn't understand that

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1 he approached -- that the sheriff's office approached
 2 him, but I knew there was that conversation.
 3 **Q. All right. You knew that conversation**
 4 **was going on?**
 5 A. Yeah.
 6 **Q. And you knew that the purpose of the**
 7 **proposed study was to understand Pierson's background**
 8 **and behavior, the school's threat/risk assessment**
 9 **procedures and responses, and the lessons that may be**
 10 **returned from this incident that could improve youth**
 11 **violence prevention in school settings, right?**
 12 A. Yes.
 13 **Q. And did you also understand that Sheriff**
 14 **Walter was going to fund this research project through**
 15 **his office?**
 16 A. Wasn't entirely sure but I -- well, no.
 17 The funds were either going to come from him or
 18 someone in -- it would be disbursed by the sheriff's
 19 office, yes. In the amount, that I recall, \$40-some
 20 thousand. I think that's what it was.
 21 **Q. But LPS was not being asked to contribute**
 22 **to the funding of this research proposal, was it?**
 23 A. No, not at that time.
 24 **Q. And one of things that this proposal was**
 25 **going to look at was what went well and what didn't go**

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1 **well at Arapahoe High School in its handling of the**
 2 **threat assessment of Karl Pierson, right?**
 3 A. Okay.
 4 **Q. Do you agree? Was that your**
 5 **understanding?**
 6 A. No.
 7 **Q. All right.**
 8 A. I didn't understand the second part or
 9 what happened at Arapahoe. What I did understand the
 10 sheriff asked me about is how do we look at the
 11 profile of someone like Karl Pierson to see if we can
 12 identify someone like that. Look at those
 13 characteristics such that we can avoid something like
 14 this in the future. It makes perfect sense that we
 15 would go the next step.
 16 **Q. As we look at Exhibit 64, there's a list**
 17 **of the research questions or study tasks that this**
 18 **research was intended to answer, right, if you look on**
 19 **pages 3 and 4?**
 20 A. Yes.
 21 **Q. Right?**
 22 A. Uh-huh.
 23 **Q. And those questions included questions**
 24 **about Karl Pierson's background, right? Yes?**
 25 A. I'm looking for it.

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1 **Q. At the bottom.**
 2 A. No. 1?
 3 **Q. Yes.**
 4 A. Okay. Got it. Got it.
 5 **Q. So one of the study tasks was to evaluate**
 6 **Karl Pierson's background?**
 7 A. Yes.
 8 **Q. Another was to evaluate the school safety**
 9 **programs and procedures that were used at Arapahoe**
 10 **High School in connection with Karl Pierson?**
 11 A. Okay.
 12 **Q. Is that right?**
 13 A. That's what it says, yes.
 14 **Q. And one of those questions, and this is**
 15 **on the top of page 4, are there any gaps in policy and**
 16 **practice or in needs and services related to the**
 17 **handling of students like Karl Pierson?**
 18 A. Yes.
 19 **Q. It goes on to even more importantly ask**
 20 **how might we address any such gaps?**
 21 A. Yes.
 22 **Q. Finally, the third study task was to**
 23 **conduct a policy analysis and error review. Do you**
 24 **see that?**
 25 A. Yes.

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1 **Q. And that focused on how the existing**
 2 **procedures were used and were those existing policies**
 3 **followed in Karl Pierson's case, right?**
 4 A. Yes.
 5 **Q. What can this case study that is being**
 6 **proposed tell us about school shootings that provide**
 7 **lessons learned for other schools, right?**
 8 A. Yes.
 9 **Q. Now, it's my understanding that**
 10 **ultimately the sheriff did not move forward with this**
 11 **research proposal. Is that your understanding as**
 12 **well?**
 13 A. No. I don't know where he -- I did not
 14 know, and I assume that he has not, but I did not know
 15 that.
 16 **Q. Okay. Well, let me ask very directly.**
 17 A. Okay.
 18 **Q. It's my understanding that the Arapahoe**
 19 **County Sheriff's Office did not move forward with this**
 20 **research proposal, and the reason he didn't move**
 21 **forward with it was because Arapahoe High School and**
 22 **Littleton Public Schools declined to cooperate with**
 23 **this research.**
 24 A. That's wrong. That is not accurate.
 25 **Q. Tell me how it's wrong.**

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1 A. I explained to the sheriff that it would
 2 be -- it wouldn't -- it would be of no problem for us
 3 to provide whatever cooperation or help, but I think
 4 he had talked about in general some multidisciplinary
 5 group and that we would provide any information they
 6 needed.
 7 I also went on to say a couple of things,
 8 one, we had worked with, and I'm assuming this is Del
 9 Elliott, the general office, we had worked with him on
 10 a number of Blue Ribbon programs. We're very familiar
 11 with, comfortable with him and Blue Ribbon programs on
 12 how we can avoid young kids getting into these
 13 situations.
 14 But I also looked at it and said, Who did
 15 you solicit? I mean, what's the -- who is out there
 16 to do this? I don't have all of the people. When I
 17 talked about it with Nate Thompson, he said, Well,
 18 this is one group, but there's some people out there,
 19 and he gave me a name or two. And I can't remember
 20 who they were out there, but the biggest thing in here
 21 for me was the -- I couldn't say that we would have
 22 interviews or commit to interviews with people who
 23 knew Karl and required them to come in or compel
 24 teachers to. Now, that's a group of people I can't
 25 do. But if this were to move forward, we would

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1 cooperate.
 2 **Q. Okay.**
 3 A. As I would today.
 4 **Q. So if I understand what you're saying,**
 5 **the hang up with respect to this proposal from LPS's**
 6 **perspective was asking either teachers or students who**
 7 **knew Karl to subject themselves to interviews for this**
 8 **research; is that right?**
 9 A. That's a big part of it.
 10 **Q. That was the main objection that LPS had**
 11 **to moving forward with this research proposal?**
 12 A. Yes.
 13 **Q. Okay. Any others?**
 14 A. Well, the other thing is some of this
 15 research is out there. It's written up. But I don't
 16 want to say -- I don't want to assume that something
 17 new wouldn't have come out. I don't mean that, and it
 18 may have been a summary of research as well that's out
 19 there. So it just needed a broader conversation. I
 20 wasn't sure how the methodology worked. The last
 21 piece of the methodology I wasn't sure.
 22 How do you speak to an entire group in a
 23 high school to get their perceptions when you're
 24 taking a small portion? Now, I know when they said it
 25 wasn't intended to, but you can make assumptions

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1 regarding causation that may not be true with just a
 2 small group of people. So I wanted to have that
 3 conversation, which we didn't. And I understand.
 4 That's okay.
 5 **Q. All right.**
 6 A. We did follow the same approach when we
 7 put together, at our board's request and my
 8 recommendation, to start a committee within the
 9 district of safety and mental health. We didn't know
 10 where it was going. We didn't want to dictate where
 11 it is going. We did want to know as much as they know
 12 how we can improve processes. And I know they brought
 13 in a national consultant at one point to talk about,
 14 or at least to begin that conversation of what needs
 15 to be done in schools and what they're observing, both
 16 nationally and internationally. And although I'm not
 17 with the district at this time and don't totally know
 18 where they're going, I assume that conversation is
 19 still going on with the community in some way.
 20 **Q. All right. As part of the broader**
 21 **discussion of the proposal described in Exhibit 64 and**
 22 **your objections to the prospect of having teachers or**
 23 **students interviewed, did you ever or did you have**
 24 **anybody ever talk to the teachers at Arapahoe High**
 25 **School to find out whether or not they would be**

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1 **willing to be interviewed as part of this research?**
 2 A. No, I did not talk to them specifically.
 3 **Q. Did you ask anybody on your staff to talk**
 4 **to the teachers to find out whether they would be**
 5 **willing to sit for interviews as part of this**
 6 **research?**
 7 A. No, and didn't know if this was going
 8 forward and didn't talk to them.
 9 **Q. Did you ever talk to any students or have**
 10 **somebody from -- at your behest speak to any students**
 11 **about whether or not they would be willing to**
 12 **participate in interviews to help study this tragedy?**
 13 A. No, I did not, and my assumption that to
 14 even do so without the format -- first of all, this
 15 being approved, and then the methodology to go about
 16 asking those questions would not come from us, and I
 17 wouldn't want to do that. I've been down that road
 18 before, and they say we're biasing the study and I
 19 wouldn't want that to occur.
 20 **Q. All right. Going back to, I think it's**
 21 **Exhibit 60, where you talk about the importance of**
 22 **learning from the past. I want to close with a couple**
 23 **of things. First -- you can just set that there.**
 24 **Even after the sheriff's report was issued, LPS never**
 25 **publicly acknowledged any mistakes it made in its**

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1 **dealings with Karl Pierson. Do you agree with that as**
 2 **a premise?**
 3 A. Okay. Yes.
 4 **Q. Okay.**
 5 A. Any specific -- yes.
 6 **Q. Well, I want to ask you, given how**
 7 **important it is to learn from past mistakes, are you**
 8 **willing to acknowledge now any of the mistakes that**
 9 **were made in handling Karl Pierson at Arapahoe High**
 10 **School, and if so, what were they, because it is**
 11 **important to learn from them.**
 12 A. I don't know how -- I know what we can
 13 say. I don't know exactly how we learn exactly from
 14 it because we don't control -- I don't even know how
 15 it passes legislation. I do know how to, perhaps, get
 16 guidance from people on this. But dots have to be
 17 connected with people. There has to be a center point
 18 that says, If I'm having someone on a threat
 19 assessment, have you had any interaction, have you had
 20 any interaction, have you had any interaction, have
 21 you had any interaction? What's going into that
 22 assessment?
 23 So the lesson learned from me is you
 24 can't act as a silo and not bring all pieces of
 25 information. The other lesson I -- it's a strategy,

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1 and I don't know whether it would apply to everyone,
 2 but I was given the idea and began to explore it
 3 actually with a friend from all of you, and we talked
 4 about it, and I think you know who I'm talking about,
 5 Bob Lembke, and it was an idea and when I left, we
 6 were in the process of doing that.
 7 Now, I don't -- I say this carefully,
 8 because I don't know if other districts can do this.
 9 We need to have a system that throws a flag up. You
 10 mentioned several things today, Mike. Did you watch
 11 the grades going down? Were there other pieces of
 12 information that should -- I mean, if I looked at
 13 behavior incidents, grades going down, suspensions,
 14 the length of suspensions, and variation in their
 15 grades. Do we have up and down, up and down?
 16 And it's not just that. This next piece
 17 I don't know how to do so well. But if the child --
 18 you can put attendance in there. You can put absences
 19 in there, and you begin to see all kind of indicators.
 20 And I'll bet we can get some of the top kids in there
 21 that are in trouble. And I'll bet if we had one or
 22 two other pieces of information, like are they being
 23 seen by someone, I don't know if we could get that. I
 24 would love to put this one in there, but I don't know
 25 if we can do that. I would like to know if they went

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1 through a divorce or a family situation and/or, which
 2 we unfortunately have had, domestic abuse or child
 3 abuse.
 4 If I saw those things, I think you would
 5 have people at the same table, and somebody needs to
 6 be responsible to see that that's not the sole, but we
 7 are in the process of developing that system right
 8 now. It's to be beta tested this fall after I left in
 9 peace and they have been working with their staff and
 10 it would be in Infinite Campus. How far they can push
 11 that, I don't know. I think that's a good thing.
 12 **Q. So those are the lessons to be learned,**
 13 **right?**
 14 A. Yeah, I think that's the lessons to be
 15 learned. I think there needs to be a strong protocol
 16 in process. When do you close doors? How much do you
 17 just insist on that? You know, it has to be fairly
 18 clear. I think lessons to be learned -- and this goes
 19 from us, but it goes to the entire community. We used
 20 to say this with kids, the code of silence has to
 21 stop, and I give Ron Booth credit for that one. He
 22 made that loud and clear to many, many people,
 23 starting with speeches he would give to the elementary
 24 school s. But I think that means parents, that means
 25 other kids. I think the notion of Safe2Tell is a good

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1 one. I don't think we do as good of a job --
 2 **Q. I'm going to move just because I'm**
 3 **getting a huge reflection.**
 4 A. I thought it was something I said.
 5 **Q. No. I'm getting a reflection from the**
 6 **building behind you. So go ahead and keep talking,**
 7 **because I am interested in this.**
 8 A. I think Safe2Tell is a valuable resource.
 9 I think it needs to be emphasized, reemphasized,
 10 emphasized again. A lot of kids know about it, some
 11 don't, some don't want to put their friends down. The
 12 code of silence has to stop.
 13 **Q. All right.**
 14 A. We get some good referrals. I was asked
 15 how many come through that, and I can't recall if it
 16 was one year or two years, but they said about the
 17 mid-40's they got them. And they said about half of
 18 those you wouldn't chase, but the other half you
 19 would. And we've had homes visits. So those are
 20 things. Communication and training.
 21 **Q. Okay.**
 22 A. And I think when there's threat
 23 assessments I -- lessons learned. We didn't have all
 24 the people at the table, and there needs to be people
 25 at the table.

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1 **Q. And I appreciate that. I do want to go**
 2 **back to the question that I asked though. And you**
 3 **answered part of it, but my question is, as the**
 4 **superintendent of Littleton Public Schools at the time**
 5 **that this tragedy occurred, are you willing to**
 6 **acknowledge any particular mistakes that the school,**
 7 **the district, or its employees made in dealing with**
 8 **and taking care of Karl Pierson?**
 9 A. It's hard for me because what I want to
 10 learn from the past is what might we have done, and
 11 I've talked about things about connecting the dots.
 12 That to me was individually procedural mistakes, I
 13 believe. There was nothing written about that, that I
 14 ever saw. But training-wise -- and if you can put all
 15 the information together, maybe it would have helped
 16 them. Maybe.
 17 **Q. All right.**
 18 A. He came in a door and murdered a child.
 19 I'm sorry, we may all not be at the same place, but
 20 there is one person that killed Claire. There's
 21 things we could have -- he pulled the trigger, and I
 22 wish he hadn't come in that door. Had he come through
 23 another door, there would have been many student s.
 24 That to me is a red herring. What's not a red herring
 25 is what do we do in terms of communicating what's

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1 going on. I don't know if we could have helped him.
 2 We're not therapists. But we may have seen the flags.
 3 What would we have done? I wonder that. I hesitate
 4 to even saying this, but there's so many of us,
 5 including your daughter, people at this table, and
 6 Michael and Desiree the most, this will never leave
 7 us. It will never leave you. What could we have
 8 possibly done, because we didn't just carry a daughter
 9 with us, we carried a community and many of them have
 10 gone to hell and some of them hell and back. And it's
 11 -- but I still don't know what we do and it haunts me
 12 with a sociopath, a psychopath, a breakdown that we
 13 may not have seen. Law enforcement, we need help. We
 14 need help. We need funding to be able to say it's
 15 okay. This state has gone so far in terms of academic
 16 achievement, which I appreciate, that they put aside
 17 some of the other things.
 18 We cut counselors for years in Littleton
 19 Public Schools. Today's world, no. We have more
 20 incidents than ever before. When I talk to the
 21 sheriff I said, Are there more kids out there? He
 22 said in Arapahoe County we have at least -- and he
 23 used the word 200 of these kids out there. How do we
 24 possibly find these kids? Was Karl a victim? I wish
 25 I could go there. I don't know enough. I'm still

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1 angry.

2 **Q. (BY MR. ROCHE) Okay.**

3 A. He killed a beautiful daughter.

4 **Q. Yep. As you know, this deposition and**

5 **the reports that will flow from the process that we've**

6 **been embarked upon are going to go to the legislature**

7 **with a list of recommendations from the experts on**

8 **both the LPS perspective and this side of the table.**

9 **Is there anything else you want to say --**

10 A. Yes.

11 **Q. -- to the legislature or as part of this**

12 **process?**

13 A. There should always be a secondary

14 review.

15 **Q. Of --**

16 A. That's a critical mistake that that --

17 that that threat assessment did not come across. I

18 believe there should have been a signoff. Now,

19 whether -- I can't say what has to be done. It's not

20 my expertise. I believe every CEO, at least, or

21 somebody that's directly responsible ought to see

22 every single threat that is being provided in an

23 assessment. That's one of the changes I made. We

24 made a change to make sure there was a group that

25 reviewed every threat assessment. I know you're aware

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1 of that. But on my desk on a weekly basis I want

2 every student, I want their grade level, and I want

3 their infraction and what's being done, at least in

4 some format, so I can ask critical questions because I

5 think everyone at this table knows when a CEO asks a

6 question, people respond. Thank you.

7 **Q. No, absolutely. Thank you for coming in.**

8 **I don't -- well, let me take a one-minute break if we**

9 **could.**

10 A. Yes.

11 (Recess taken, 4:13 p.m. to 4:16 p.m.)

12 **MR. ROCHE:** Mr. Murphy, I really do

13 appreciate you coming in. I know this wasn't easy for

14 you or anybody else who has been a part of this

15 process, but I do appreciate you coming in and

16 appreciate your answers, and I don't have any more

17 questions for you. I don't think Steve does.

18 **MR. EVERALL:** I don't.

19 **WHEREUPON,** the within proceedings were

20 concluded at the approximate hour of 4:16 p.m. on the

21 11th day of November, 2015.

22 * * * * *

23

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I, SCOTT D. MURPHY, 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

SCOTT D. MURPHY

The signature above of SCOTT D. MURPHY

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. 11/11/15 (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

SCOTT D. MURPHY 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 25th day of November, 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 SCOTT D. MURPHY 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 25th day of November, 2015.

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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