

1 JAG NO: 2015-0665A

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3 DEPOSITION OF: VICTORIA D. LOMBARDI - July 2, 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 VICTORIA D. LOMBARDI was taken on behalf of the
14 Claimants at 950 17th Street, Suite 2400, Denver,
Colorado 80202, on July 2, 2015, at 2:04 p.m., before
Ashley D. Mahe, Registered Professional Reporter and
Notary Public within Colorado.

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2

A P P E A R A N C E S

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

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

For Victoria D. Lombardi:
 KRIS GOMEZ, ESQ.
 Colorado Education Association
 1500 Grant Street
 Denver, Colorado 80203

Also Present:
 Michael Davis
 Desiree Davis
 Carol Lembke
 Sarah Goodrum
 Michael Jones

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I N D E X

EXAMINATION OF VICTORIA D. LOMBARDI: PAGE
 July 2, 2015

By Mr. Roche 4
 By Mr. Everall 86
 By Ms. Gomez 100

DEPOSITION EXHIBITS: INITIAL REFERENCE

Exhibit 21 E-mail to McCauley from Lombardi, 20
 12/18/13, with e-mail attached
 Exhibit 22 Progress Report 42
 Exhibit 23 E-mail to severall@smpmc.com from 45
 Lombardi, 1/27/14, Subject: KP
 Exhibit 24 Behavior Detail Report, Name: Karl 56
 Halverson Pierson Grade: 12
 Exhibit 25 Document entitled "Student Statement" 62
 Exhibit 26 Colorado Bureau of Investigation 65
 ACISS Investigative Supplement
 Report 2013-269/18, Report Date:
 12/23/2013

DEPOSITION EXHIBITS: (Previously marked)

Exhibit 16 Progress Report 20

4

1 WHEREUPON, the following proceedings were
 2 taken pursuant to the Colorado Rules of Civil
 3 Procedure.
 4 * * * * *
 5 VICTORIA D. LOMBARDI,
 6 having been first duly sworn to state the whole truth,
 7 testified as follows:
 8 EXAMINATION
 9 BY MR. ROCHE:
 10 Q. Good afternoon, Ms. Lombardi. We just
 11 met. My name is Mike Roche, and as you know, I
 12 represent the Davis family in connection with this
 13 arbitration that we are doing with Littleton Public
 14 Schools. First, I want to tell you, thank you so much
 15 for coming in. I really appreciate it. I know this
 16 isn't easy for you, and I know everything that's gone
 17 on over the last 19 months hasn't been easy for you,
 18 but we really do appreciate you coming in to tell us
 19 information that you know about everything that
 20 happened and -- that means a lot to us.
 21 A. I'm happy to help.
 22 Q. Also, I, as I'm sure you know, had a
 23 chance to take a look at some of your e-mails related
 24 to the last 19 months, and one thing that's abundantly
 25 clear in those e-mails is you are clearly one of those

5

1 teachers who cares intensely about her students.
 2 A. That is true.
 3 Q. That comes through in spades. So,
 4 frankly, thank you for that. I had a daughter come
 5 through Arapahoe. I don't think she had you.
 6 A. I didn't have Katy, no.
 7 Q. But you know it's --
 8 A. Thank you.
 9 Q. You're the kind of teacher I want her to
 10 have.
 11 A. I do love those kids.
 12 Q. That's very, very clear. I'm not going
 13 to ask you about what you and Ms. Gomez talked about,
 14 because that's not my place, but I did want to tell
 15 you that as part of -- what this arbitration is about
 16 and what it's not about.
 17 A. Okay.
 18 Q. So let me start with what it's not about.
 19 It's not about blaming anyone.
 20 A. I understand.
 21 Q. It's not about saying, This is whose
 22 fault it is that the shooting happened. Okay. What
 23 we are here to do is to try to find out why it
 24 happened, and even more importantly, what can be done,
 25 what improvements can be made, and what lessons can be

6

1 learned so it doesn't happen again. So everything
 2 that I'm going to be talking to you about and
 3 everything that I'm going to be asking you about is
 4 done with that as its objective. Okay?
 5 A. Okay.
 6 Q. Okay. A couple of housekeeping items is
 7 what I generally call them. There is -- the judge who
 8 is overseeing this arbitration has entered what is
 9 called a sequestration order. And what that means,
 10 because nobody who's not a lawyer would know this --
 11 A. Right.
 12 Q. -- it means the witnesses in the
 13 arbitration are not permitted to talk to one another
 14 about their testimony in the case.
 15 A. Okay.
 16 Q. And the reason for that is if witnesses
 17 talk back and forth they can either corroborate or
 18 they can unconsciously and unintentionally affect
 19 another person's memory.
 20 A. I understand.
 21 Q. Okay. And then some general rules of the
 22 road that I tell every witness when I'm taking a
 23 deposition, Ashley is really good. She types really
 24 fast, but she can only type one person's words at a
 25 time. She will take down everything I say, everything

7

1 that you say, anything Ms. Gomez says, anything
 2 Mr. Everall says, anything anybody that's in the room
 3 says.
 4 A. Okay.
 5 Q. But we can only talk one person at a
 6 time, which is not normally how conversations go. I'm
 7 going to try and let you finish your answer before I
 8 start talking. It will be cleaner as well if you let
 9 me finish my question before you start talking, even
 10 though you'll probably know how the question ends
 11 before I stop.
 12 A. Okay. I understand.
 13 Q. And the next thing, and you've been
 14 perfect on this so far, head shakes and uh-huh and
 15 huh-uh don't come through very clearly in the record.
 16 A. Right. I understand.
 17 MS. GOMEZ: I did explain that to her.
 18 Q. (BY MR. ROCHE) Usually when I give that
 19 instruction, somebody goes, Uh-huh.
 20 A. I've never done a deposition before, so
 21 I'm going to have to really think about this.
 22 Q. And I appreciate that. Another important
 23 rule, I'm going to ask questions that don't make
 24 sense. I'll either stumble over my words or it's
 25 confusing to you. If you don't understand my question

8

1 or if you don't think it makes sense, just tell me,
 2 and I'll rephrase it. Okay?
 3 A. Uh-huh.
 4 Q. Finally, I don't think this is going to
 5 run real long today, but it's also not meant to be an
 6 endurance test. So if you want to take a break at any
 7 time, just tell me.
 8 A. Okay. Thank you.
 9 Q. And especially given the nature of some
 10 of the things we're going to be talking about, if you
 11 need a break to compose yourself, use the ladies'
 12 room, just catch your breath, that's totally okay.
 13 All right?
 14 A. Okay.
 15 Q. Great. Why don't we get started if you
 16 don't have any questions about the process for me.
 17 A. I'm ready.
 18 Q. Would you state your full name for the
 19 record.
 20 A. Victoria D. Lombardi.
 21 Q. Okay. And where do you work,
 22 Ms. Lombardi?
 23 A. I work at Arapahoe High School for
 24 Littleton Public Schools.
 25 Q. And you're a teacher there?

9

1 A. I am. I teach Spanish.
 2 **Q. And how long have you worked at Arapahoe**
 3 **High School?**
 4 A. Seven years.
 5 **Q. Did you work at a different LPS school**
 6 **prior to that?**
 7 A. No.
 8 **Q. Was that your first teaching job?**
 9 A. Yes.
 10 **Q. Okay. As part of -- do you teach**
 11 **anything besides Spanish?**
 12 A. No, just Spanish.
 13 **Q. As part of your job as a teacher at**
 14 **Arapahoe and in the time period before the shooting,**
 15 **did you have any familiarity with or involvement in**
 16 **the disciplinary process for students at the school**
 17 **who got in trouble?**
 18 A. Let me clarify, you mean my own students,
 19 was I involved in the disciplinary process with one of
 20 my own students?
 21 **Q. I was speaking more generally, but we can**
 22 **certainly come at it from that angle. If a kid in**
 23 **your class got in trouble, how would you report that?**
 24 A. I write a referral.
 25 **Q. Okay. And what does a referral look**

10

1 **like?**
 2 A. Well, it's a three-part form, and we fill
 3 out the name and the student's grade and whether it's
 4 a first, second, or third referral, the teacher's
 5 name, who the referral is going to, whether it goes to
 6 a counselor or administrator, and then we write in
 7 what happened with the student, the student's
 8 response, and the parent's response.
 9 **Q. Okay.**
 10 A. So we don't turn one in until we've
 11 spoken to a parent or try to speak to a parent. And
 12 then that referral goes to the specific counselor for
 13 that student alphabetically or the specific
 14 administrator by class.
 15 **Q. Right. And it's my understanding that**
 16 **the administrators are broken out -- every assistant**
 17 **principal has a specific grade?**
 18 A. That's right.
 19 **Q. Got it. So the referrals that you would**
 20 **prepare go either to the counselor or to the assistant**
 21 **principal responsible --**
 22 A. Right.
 23 **Q. -- for the class?**
 24 A. Right.
 25 **Q. They don't go to both?**

11

1 A. No. It's one referral. But usually the
 2 behavior issues go to the administrator and grades and
 3 absences and maybe emotional issues go to the
 4 counselor.
 5 **Q. Okay. No, that's a very helpful**
 6 **clarification, actually. And are these referrals that**
 7 **you're describing, is that a preprinted form --**
 8 A. Yes.
 9 **Q. -- that you can fill out?**
 10 A. Yes.
 11 **Q. And do you do that online, or do you do**
 12 **that in a handwritten form?**
 13 A. It's a handwritten carbon copy form. So
 14 when we turn it in --
 15 **Q. So it's like red, pink, yellow; or white,**
 16 **pink, yellow?**
 17 A. Yeah, it's white, pink, yellow. White,
 18 pink, yellow, yes.
 19 **Q. Okay. Great.**
 20 A. And then it used to be that you didn't --
 21 like I never even made a copy of the referral when I
 22 turned it in because I would send it off, and then I
 23 would wait for it to come back with the response
 24 between either the counselor or the administrator or
 25 both. And now I take pictures before I send it on

12

1 because -- just for my records.
 2 **Q. So you would have copies of those**
 3 **referrals?**
 4 A. Yes.
 5 **Q. I'm going to ask one more thing about the**
 6 **deposition, because I know Ashley wants me to. The**
 7 **slower we talk, the easier it is for her. That's why**
 8 **she is smiling. And I know this is kind of a**
 9 **nerve-racking environment.**
 10 A. And I talk fast just in general, so . . .
 11 **Q. Okay. So I know she is getting**
 12 **everything down that you're saying. She can do it**
 13 **really fast, but I'm just trying to look out for her.**
 14 A. Okay.
 15 **Q. So the three-part referral, the white,**
 16 **pink, yellow, who gets those three copies, if you**
 17 **remember?**
 18 A. I think it's a -- I have one in my purse.
 19 Do you want me to show it to you or just the bottom
 20 copy?
 21 MR. ROCHE: Why don't we go off for one
 22 second.
 23 (Recess taken, 2:13 p.m. to 2:14 p.m.)
 24 MR. ROCHE: Back on the record.
 25 A. So the white copy is the student file,

13

1 the yellow is the teacher, the pink is the counselor,
 2 and the gold is special services.
 3 **Q. (BY MR. ROCHE) Okay. Those are the --**
 4 **so there's four copies of this preprinted form?**
 5 A. I guess so. I'm sorry, I thought there
 6 were only three.
 7 **Q. Oh, that's okay. And what is the top of**
 8 **the form? What is its title?**
 9 A. It says Arapahoe High School Student
 10 Referral.
 11 **Q. Okay. And that form is used for both**
 12 **behavioral and attendance and emotional well-being**
 13 **issues?**
 14 A. Right.
 15 THE DEPONENT: So can I just show him
 16 this part without the name?
 17 MS. GOMEZ: Just explain it.
 18 A. So it says reason for referral to
 19 assigned counselor, and then that's academic concern,
 20 attendance, inappropriate behavior, welfare concern,
 21 and student review candidate.
 22 THE DEPONENT: Sorry.
 23 **Q. (BY MR. ROCHE) You're fine.**
 24 A. And then under that, it says reason for
 25 referral to assigned administrator, and then you check

14

1 serious discipline.
 2 **Q. Okay. So this is a form --**
 3 MR. EVERALL: You check what?
 4 THE DEPONENT: Serious discipline.
 5 **Q. (BY MR. ROCHE) All right. And so this**
 6 **form that we're talking about, the referral form, is**
 7 **something that is used in serious discipline cases**
 8 **among other things?**
 9 A. Not necessarily.
 10 **Q. Okay. In broad strokes, what can you**
 11 **tell me about when a teacher -- I'm using obviously**
 12 **you as an example. When would you fill out a referral**
 13 **form and when would you not?**
 14 A. I would fill out a referral form if I had
 15 an issue with a student and spoke to their parents and
 16 it wasn't resolved. Like if a student has unexcused
 17 absences, I call the parent, and the parent says,
 18 Well, I can't stop him from missing class, and then I
 19 write a referral.
 20 **Q. Okay.**
 21 A. When I don't write a referral is when I
 22 call 6,000, which is the emergency number at the
 23 school, and get an administrator involved right away.
 24 **Q. Okay. So if you have a sort of direct**
 25 **handoff to administration, then there is no purpose in**

15

1 **filling out the referral form, right?**
 2 A. Right.
 3 **Q. Because they've already got it, they're**
 4 **aware of the facts?**
 5 A. Right. That's correct.
 6 **Q. Okay. Got it. And regardless of how a**
 7 **disciplinary issue comes to the attention of the**
 8 **administration, once it is brought to the**
 9 **administration's attention, do you, as a teacher, have**
 10 **any further involvement in deciding whether or how or**
 11 **for how long a student should be suspended?**
 12 A. Absolutely not.
 13 **Q. Okay. And what about the threat**
 14 **assessment process? In the time period before the**
 15 **shooting, as a teacher, would you have any involvement**
 16 **in that?**
 17 A. I personally have never been involved in
 18 a threat assessment. I don't even know of any time
 19 one has been conducted since I've been there before
 20 the shooting.
 21 **Q. And from time to time, students get**
 22 **suspended or expelled --**
 23 A. Yes.
 24 **Q. -- at Arapahoe?**
 25 A. Yes.

16

1 **Q. Just like every other high school in**
 2 **America?**
 3 A. Yes.
 4 **Q. When a student who is one of your**
 5 **students gets suspended, how are you told about that?**
 6 A. We receive an e-mail that says, Your
 7 student has been suspended, please bring down any
 8 homework to the front office for Paula Lewis to give
 9 to someone to pick up.
 10 MS. GOMEZ: If I can interrupt? I'm
 11 sorry, but my understanding is that the procedures
 12 have changed from before the shooting and after.
 13 MR. ROCHE: Right. And that was going to
 14 be my next question.
 15 MS. GOMEZ: Okay.
 16 MR. ROCHE: No, I appreciate it. Feel
 17 free to jump in, because there is significant change
 18 in I think how things are done since December of 2013.
 19 MS. GOMEZ: And I just don't -- yeah, I
 20 -- just because what I know -- I don't know if she was
 21 clear on it.
 22 A. I was talking before the shooting.
 23 **Q. (BY MR. ROCHE) Right. And that's -- I**
 24 **should have covered that when I did my little**
 25 **instruction. There will be times when I'm asking**

17

1 **questions about how things worked before the shooting,**
 2 **and there will be times when I'm asking about how**
 3 **things worked after the shooting. And if I'm not**
 4 **clear, feel free to clarify, and if I'm not clear on**
 5 **that, feel free to ask me which time period I'm asking**
 6 **about.**
 7 A. Okay.
 8 **Q. So what you just described about how**
 9 **you're informed of suspensions described how it worked**
 10 **before the shooting?**
 11 A. Yes. And we did get -- sometimes we did
 12 get the referral or the sheet saying our student is
 13 suspended in our mailbox as well.
 14 **Q. Okay. And would you be told -- and,**
 15 **again, I'm talking about the time period prior to the**
 16 **shooting. Would you routinely be told the reasons for**
 17 **a student's suspension?**
 18 A. No.
 19 **Q. So you would know that the student was**
 20 **suspended, you would know how long the student was**
 21 **suspended, but not why the student was suspended?**
 22 A. That's correct.
 23 **Q. Now, let's talk about the time period**
 24 **since the shooting. The process about informing**
 25 **teachers about suspensions has changed, right?**

18

1 A. Somewhat.
 2 **Q. Okay. Tell me what is different about**
 3 **the process now, if you would.**
 4 A. Now we can go to that administrator and
 5 ask why the student was suspended. We have to go face
 6 to face and ask them. It's not -- they don't just
 7 tell us.
 8 **Q. Oh, okay. But you have the opportunity**
 9 **to go walk down to their office or --**
 10 A. Uh-huh. Yes.
 11 **Q. -- his or her office and say what**
 12 **happened?**
 13 A. Right.
 14 **Q. But as a matter of routine, you're not**
 15 **sent an e-mail or --**
 16 A. No.
 17 **Q. -- letter in your mailbox saying --**
 18 A. No.
 19 **Q. Okay. What do you think of that new**
 20 **process; better, worse, the same?**
 21 A. The problem for me is this -- I have 206
 22 students. When a student is suspended, and I've got
 23 to go down to the office to try and find the
 24 administrator to find out why my student was
 25 suspended, sometimes the administrator is there,

19

1 sometimes he's not; it can sometimes be kind of
 2 tedious, and I don't always find out.
 3 **Q. Okay. And I take it when you have the**
 4 **time to go down there, and I understand as busy as you**
 5 **guys are with as many students as you have, it can be**
 6 **a challenge. Are you given any paperwork when you**
 7 **actually make the effort to go talk to the**
 8 **administrator, or do you just get a verbal report?**
 9 A. You just get a verbal report.
 10 **Q. So you don't see the suspension form,**
 11 **right?**
 12 A. Well, we just have the suspension form
 13 with the homework, but it doesn't have a reason. It
 14 just has the dates of suspension and then you put the
 15 homework with it.
 16 **Q. Okay. I got it. It sounds like you**
 17 **would prefer the administration take a more proactive**
 18 **role in letting the teachers know why each student was**
 19 **suspended?**
 20 A. Yes.
 21 **Q. And why do you think that's important?**
 22 A. Well, I think it takes all of us to keep
 23 the school safe and we just -- information is
 24 important and communication is important.
 25 **Q. And that was actually the very next topic**

20

1 **I wanted to get to because I think it is.**
 2 MR. ROCHE: So let's go ahead and mark
 3 this as Exhibit 21.
 4 (Deposition Exhibit 21 was marked.)
 5 **Q. (BY MR. ROCHE) You know what, that's the**
 6 **wrong exhibit. You can actually hold onto it, because**
 7 **I'm going to be using that one next. I want to show**
 8 **you something that we've already marked as an exhibit.**
 9 **I'm looking at Exhibit 16. So let me show you this,**
 10 **and I'm going to direct your attention to the very**
 11 **bottom of the page.**
 12 A. Yes.
 13 **Q. And Exhibit 16, for the record, is a**
 14 **document prepared by the Arapahoe County Sheriff's**
 15 **office describing a statement that Michelle Crookham**
 16 **gave after the shooting. Do you see that?**
 17 A. Yes.
 18 **Q. And you know Ms. Crookham?**
 19 A. Yes.
 20 **Q. She's another teacher at Arapahoe?**
 21 A. Yes.
 22 **Q. And at the bottom of her statement,**
 23 **Ms. Crookham, what I would characterize, complains**
 24 **that "The AHS administration will not tell the**
 25 **teachers anything about student discipline as it is a**

21	<p>1 violation of the student's privacy rights." Do you</p> <p>2 see that?</p> <p>3 A. Yes, I do.</p> <p>4 Q. And I'll ask you, do you share</p> <p>5 Ms. Crookham's concerns on that?</p> <p>6 A. Yes, I do.</p> <p>7 Q. And did you have those concerns before</p> <p>8 the shooting?</p> <p>9 A. Yes.</p> <p>10 Q. And do you have them even after?</p> <p>11 A. Somewhat.</p> <p>12 Q. It's improved somewhat I take it?</p> <p>13 A. It has improved somewhat.</p> <p>14 Q. And still not where you would like it to</p> <p>15 be, I take it?</p> <p>16 A. Yes.</p> <p>17 Q. To your knowledge, is that a widespread</p> <p>18 concern among the faculty at Arapahoe?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And to your knowledge, had faculty</p> <p>21 members at Arapahoe voiced that complaint to the</p> <p>22 administration at either Arapahoe or to the</p> <p>23 administration at LPS prior to the shooting?</p> <p>24 A. I don't know.</p> <p>25 Q. Okay. With respect to the -- I'm sorry,</p>	23	<p>1 it's a very brief -- it's not like what we can write</p> <p>2 on a referral form.</p> <p>3 Q. So it's disciplinary Twitter?</p> <p>4 A. Right. And it has a code like parent</p> <p>5 contact is PC or I don't know. I can't remember.</p> <p>6 Q. And do you think it's important to be</p> <p>7 able to access that information so that all of the</p> <p>8 faculty and administrators can see that?</p> <p>9 A. Absolutely, yes.</p> <p>10 Q. And help us understand why?</p> <p>11 A. Well, before the shooting, if I had an</p> <p>12 issue with a student, I couldn't go to another teacher</p> <p>13 and say, Hey, do you see the same behavior, because</p> <p>14 this is concerning me or whatever. But after the</p> <p>15 shooting, we can put it in the contact log, and we can</p> <p>16 also go to that teacher, as I have done, e-mail, and</p> <p>17 say, Hey, this is what happened in class, I see he's</p> <p>18 failing your class too. Can we -- you know, do you</p> <p>19 see some of the same behaviors? Do you want to talk?</p> <p>20 You know, that kind of thing, and for me that's been</p> <p>21 very helpful.</p> <p>22 Q. Okay. Makes sense. Now, it's my</p> <p>23 understanding, and I'm not sure if it was on Infinite</p> <p>24 Campus or somewhere else, that prior to the shooting,</p> <p>25 there was some kind of online contact log and also</p>
22	<p>1 I'm bouncing around a little bit.</p> <p>2 A. That's okay.</p> <p>3 Q. With respect to the referral forms that</p> <p>4 we were talking about a little while ago --</p> <p>5 A. Yes.</p> <p>6 Q. -- do you know if that information on</p> <p>7 those referral forms are uploaded into the Infinite</p> <p>8 Campus database?</p> <p>9 A. They are not.</p> <p>10 Q. Do you know why not?</p> <p>11 A. No. I do know that before the shooting,</p> <p>12 we didn't have any way to put notes in Infinite Campus</p> <p>13 about a student's -- the contact with the parent or</p> <p>14 anything in Infinite Campus.</p> <p>15 Q. And I understand that's changed since the</p> <p>16 shooting?</p> <p>17 A. Right. Right. So in March, I think it's</p> <p>18 around March, we now have what is called a contact</p> <p>19 log. So, for instance, I had a student in the spring</p> <p>20 of 2014 that was not coming to class, unexcused. So I</p> <p>21 looked on the contact log, and I could see that there</p> <p>22 had been some contacts made with the girl's aunt who</p> <p>23 she lived with. And so I could add on there that I</p> <p>24 also spoke to the aunt so that we have a log of those</p> <p>25 contacts. But it only takes like 200 characters, so</p>	24	<p>1 something called a behavior detail report maintained</p> <p>2 on each student at Arapahoe. Are you familiar with</p> <p>3 those?</p> <p>4 A. I am not familiar. It wasn't anything I</p> <p>5 ever used or ever had access to.</p> <p>6 Q. And that was going to be my question,</p> <p>7 does the faculty -- I should say prior to the</p> <p>8 shooting, did the faculty at Arapahoe have access to a</p> <p>9 student's behavioral detail reports, if you know?</p> <p>10 A. I don't think so.</p> <p>11 Q. Okay. And what about the contact logs?</p> <p>12 Prior to the shooting, did the faculty have access to</p> <p>13 the --</p> <p>14 A. No.</p> <p>15 Q. Thank you. I want to talk obviously</p> <p>16 about your dealings with Karl Pierson and, again, I</p> <p>17 know some of this is going to be hard, so if you want</p> <p>18 to take a break at any time, just let me know.</p> <p>19 A. Okay.</p> <p>20 Q. I know Karl was in your Spanish II class</p> <p>21 the fall semester of 2013?</p> <p>22 A. Yes, he was.</p> <p>23 Q. Had you had him in class prior to that?</p> <p>24 A. No.</p> <p>25 Q. Prior to the beginning of the fall</p>

25

1 **semester of 2013, did you have any idea who he was?**
 2 A. Yes.
 3 **Q. How did you know?**
 4 A. I was a cross-country coach for three
 5 years, and he was on the cross-country team. I
 6 actually coached the girls, but -- and it's a huge
 7 team. There's like 125 girls and 100 boys, so I
 8 didn't spend a lot of time with the boys, but I knew
 9 who he was. And I had had one incident in particular
 10 going into his freshman year that made me know who he
 11 was.
 12 **Q. Tell me about that incident.**
 13 A. Well, during the summers, we do summer
 14 running club for all kids beginning 9th grade all the
 15 way through. And on Wednesdays, we would go off site
 16 to run. We would go to Bear Lake or Waterton or
 17 Falcon Hills and we would go to Red Rocks.
 18 **Q. Okay.**
 19 A. So this one day we were at Red Rocks, and
 20 we made it very clear to the parents that the kids
 21 need to be picked up by 8:45. We start at 7:30 and
 22 that we teachers had lives and come get your kid.
 23 **Q. Sure.**
 24 A. And so I'm the only one that doesn't have
 25 little kids at home of the coaches, so when 8:45 came,

26

1 all of the kids got picked up except for Karl. And I
 2 didn't know him at this time. This is the first time
 3 I met him. And so we waited and the mom didn't show
 4 up, and I asked Karl, and he said he called her. And
 5 then 9:15 rolled around, and I said, Karl, can you
 6 call your mom again? And he said -- he picked up the
 7 phone, and I heard him say, Well, Mom, my coach is
 8 waiting, he said, Okay. And then he hung up. And I
 9 said, What did she say? And he said, She said she is
 10 at Target, and she'll get here when she gets here.
 11 And she came at 10 o'clock.
 12 **Q. At 10 o'clock?**
 13 A. And she pulled up in her car, and we were
 14 on the little dirt path there right at the bottom of
 15 the stairs at Red Rocks, and I was right here, and
 16 Karl was on the other side. And she pulled up, she
 17 looked straight ahead, she didn't wave or say sorry or
 18 thank you. She looked straight ahead, had her hands
 19 on the steering wheel, Karl got in, she didn't say one
 20 word to him, and she drove off. And that's the only
 21 interaction I ever had with her.
 22 **Q. With Mrs. Pierson?**
 23 A. Right.
 24 **Q. Okay. During -- that sounds like about**
 25 **an hour and 15 minutes that you were waiting for**

27

1 **Mrs. Pierson to finish her shopping and come get her**
 2 **son. Did you and Karl talk at all?**
 3 A. We didn't because he was carpooling with
 4 another little girl, and the two of them stood on that
 5 side and chatted. And she got in the back seat, they
 6 were talking to each other, and then they left.
 7 **Q. Okay.**
 8 A. I think I might have chitchatted maybe,
 9 but nothing memorable.
 10 **Q. Okay. And that was your only encounter**
 11 **or dealings with Karl Pierson prior to the fall of**
 12 **2015?**
 13 A. That I can remember.
 14 **Q. Sure.**
 15 A. You know, I probably cheered him on at a
 16 cross-country meet or something, but I don't remember
 17 anything else.
 18 **Q. Of course. When he -- well, strike that.**
 19 **Prior to the fall of 2013, did you know**
 20 **anything about whether or not he had a reputation at**
 21 **the school --**
 22 A. No.
 23 **Q. -- or whether or not he was a kid on the**
 24 **radar --**
 25 A. No.

28

1 **Q. -- or behavioral issues or anything like**
 2 **that?**
 3 A. No.
 4 **Q. And the fall semester starts in mid**
 5 **August, generally, right?**
 6 A. Yes.
 7 **Q. Okay. And I know there were some**
 8 **incidents in your classroom, and I want to obviously**
 9 **talk to you about those. But I want to first make**
 10 **sure I know about them all. So I want to sort of just**
 11 **sketch out what they all were. I know there was an**
 12 **incident at the very beginning of November where he**
 13 **said something about drinking tequila in class?**
 14 A. Yes.
 15 **Q. And then there was the bigger incident on**
 16 **December 11?**
 17 A. Yes.
 18 **Q. And I understand from some of the**
 19 **documents that have been produced in this case that**
 20 **there were perhaps some other incidents that never got**
 21 **written down?**
 22 A. Well, they weren't anything serious. He
 23 was disrespectful, but a lot of teenagers are
 24 disrespectful, they're teenagers.
 25 **Q. Right.**

29

1 A. It wasn't to the point where I needed to
 2 get an administrator involved, but they were things
 3 like I would say, Karl, are you listening, Karl?
 4 Because he was always talking. He was always on his
 5 iPad or tablet. And I had to redirect on a pretty
 6 regular basis to get back in focus with the class. At
 7 least once every class period.

8 **Q. At least once every class period?**
 9 A. Uh-huh.

10 MS. GOMEZ: Yes?
 11 A. Yes. Which is not that unusual with
 12 teenagers. But when I would ask him to stop talking
 13 or I would say, Karl, are you with me? And he would
 14 say, Yes, ma'am, in this really kind of arrogant voice
 15 and he did that every day.

16 **Q. (BY MR. ROCHE) Okay. We've heard as
 17 part of the sheriff's investigation and as part of
 18 this arbitration about a number of incidents that
 19 happened in other teachers' classrooms where he was
 20 either rude, sort of verbally bullying, or disruptive
 21 to either the teachers or the other students?**
 22 A. Yes.

23 **Q. Were those frequent occurrences in your
 24 classroom as well?**
 25 A. Well, the disruptions were pretty

30

1 frequent as far as him --
 2 MR. EVERALL: What was the word she used?
 3 MR. ROCHE: Disruptions.

4 A. As far as him being disrespectful with
 5 the other kids, I saw it the day he said, Can we drink
 6 tequila in the class, and on the 11th is when I saw
 7 him be rude to other kids.

8 **Q. (BY MR. ROCHE) Okay. And I'm going to
 9 try to do this as close to chronologically as I can.
 10 Parent-teacher conferences are usually in the middle
 11 of October, right?**
 12 A. Yes. Around the 15th and 16th.

13 **Q. Right. And you obviously -- everybody
 14 lines up in the gym, the auxiliary gym --**
 15 A. Right.

16 **Q. -- and everybody makes their rounds?**
 17 A. Right. Five minutes.

18 **Q. Right. The fall of 2013, I understand
 19 that Karl's father attended the parent-teacher
 20 conferences?**
 21 A. Yes, he did.

22 **Q. And that stands out in your mind?**
 23 A. Yes.

24 **Q. Tell us about what you and Mr. Pierson
 25 discussed at the parent-teacher conference in the fall**

31

1 **of 2013.**
 2 A. Well, he sat down, and he told me who he
 3 was, because I had never met him before. And he said
 4 something like, What horrible things do you have to
 5 say about my son like every teacher in this place?
 6 **Q. Okay.**
 7 A. And --
 8 **Q. Kind of an odd way to start a
 9 parent-teacher conference, right?**
 10 A. Absolutely. And I said, Well, actually,
 11 Mr. Pierson, I'm not having that many issues with
 12 Karl. I said, He does talk in class, and I asked him
 13 to stop. And I said, His grade is not where it should
 14 be because he has some -- I think I said some missing
 15 assignments or he has to retake a test or something.
 16 I'm not sure about that. And I said, but other than
 17 that, I'm not having a lot of issues with him, because
 18 that was true at that point.

19 **Q. Sure. Did he tell you anything about
 20 what terrible things all the other teachers were
 21 telling him about his son?**
 22 A. No. And I didn't ask.

23 **Q. Okay. Did he say anything after you told
 24 him that you weren't having that many behavioral
 25 issues with Karl?**

32

1 A. No. I just remember him getting up and
 2 leaving. I don't remember exactly, but it wasn't
 3 anything that I can remember.

4 **Q. Okay. And I take it that was fairly
 5 memorable to you at the time?**
 6 A. Yeah.

7 **Q. Because --**
 8 A. Yes.

9 **Q. -- most parent-teacher conferences don't
 10 start like that, right?**
 11 A. Well, and I -- most of my parents really
 12 like me, so I love parent-teacher conferences. I love
 13 to meet the parents. I never have parents upset. So
 14 it was odd.

15 **Q. Okay. And after this odd parent-teacher
 16 conference with Mr. Pierson, did you go and talk to
 17 any of Karl's other teachers and say, What is he doing
 18 in your class or anything like that?**
 19 A. No, because we couldn't do that. That's
 20 against -- that wasn't -- that was against FERPA. We
 21 weren't supposed to talk to other teachers about
 22 students.

23 **Q. Okay. And help me understand that policy
 24 that you understood was in place.**
 25 A. Well, it's a little bit vague for me, and

33	<p>1 I will say that I struggle with it because I don't 2 want to make a teacher feel uncomfortable asking them 3 about a student. 4 Q. Okay. 5 A. I don't know that everybody follows FERPA 6 guidelines to the tee. I hope that I haven't violated 7 them, but I -- before the shooting, I would not be 8 comfortable going up to a teacher and saying, What is 9 your issue with Karl Pierson? 10 Q. Okay. And that's what I'm trying to get 11 at is -- again, in this time period prior to the 12 shooting, had you as a teacher been told by somebody 13 that it was inappropriate for you to talk to your 14 fellow teachers about a student that you had in 15 common? 16 A. I can't remember, but it came from 17 somewhere. 18 Q. Okay. 19 A. I have always -- I just felt that way 20 since I started teaching. 21 Q. Okay. But you can't recall a specific 22 training program or a specific memo that you got that 23 said, Don't talk to the other teachers about the 24 students you all have in common? 25 A. I don't remember.</p>	35
34	<p>1 Q. Okay. 2 A. I'm sorry. 3 Q. That's okay. No, I mean, obviously this 4 is going back to things, some of which happened a long 5 time ago, some of which is more recent. 6 A. Right. 7 Q. It's not meant to be a memory test. 8 A. Okay. 9 Q. But this is obviously one of the areas 10 that is, I think, of interest for everybody involved 11 in this arbitration, is how to make sure everybody has 12 got the best information they can have to make the 13 best decisions they can make. 14 A. I understand. 15 Q. So let me ask more broadly. Was it, in 16 your experience, the common practice or culture at 17 Arapahoe High School for teachers not to discuss among 18 themselves the students they had in common and their 19 behavioral issues they might be facing with those 20 students? 21 A. I think so. 22 Q. Okay. 23 A. Part of the problem -- 24 Q. Yes. 25 A. -- is that we're very compartmentalized.</p>	36
33	<p>1 So I might tell one of my coworkers in the Spanish 2 department about somebody, but it wouldn't leave the 3 Spanish department. I wouldn't walk over to math -- 4 you know, for instance, I didn't know about Michelle 5 Crookham's situation at all. We just don't do that. 6 Q. Okay. 7 A. Or didn't do that. 8 Q. And is that different now since the 9 shooting? 10 A. It is for me, yes. 11 Q. Has there been a policy change at 12 Arapahoe in that regard since the shooting? 13 A. Yes. 14 Q. Tell me about that if you would. 15 A. We had a staff meeting, and I don't know 16 when it was. It was maybe February or March, and we 17 were trained by Melissa Cooper, from the district, and 18 she came and told us that we were able to talk to 19 other teachers if it was -- if it was a need to know/ 20 need to ask -- or need to ask/need to know. I'm 21 sorry, need to ask -- I don't know. And so if you -- 22 so the way we were to think of it is that if I had a 23 problem with a student, and I wanted to ask another 24 teacher if they were having the same issue, that would 25 be a need to know/need to ask or need to ask/need to</p>	36
36	<p>1 know right. If I said, Is your student blurting out 2 obscenities in class, that teacher would need to know 3 that that student is doing it in another class. 4 That's how we think of it. 5 Q. So in broad strokes, and correct me if 6 I'm wrong, I would characterize that as don't gossip 7 about the kids, but if it's a legitimate thing -- 8 A. Exactly. 9 Q. -- feel free to talk? 10 A. That's how we took it. And they said, 11 This is not saying we made mistakes before December, 12 this is how we're doing it from now on. 13 Q. And that has been helpful? 14 A. Very. I've used it several times. 15 Q. Okay. Did you get a handout or anything 16 from Ms. or Mrs. Cooper as part of that presentation 17 or training session in February or March of 2014? 18 A. We had so many meetings during that time, 19 I can't remember. I think we -- I think we might 20 have, yeah. I'm sorry. 21 Q. That's okay. 22 A. I think we got the PowerPoint, like the, 23 you know, slides on a piece of paper, I think. 24 Q. Okay. Let's go back to the fall of 2013, 25 and I think it's the exhibit that we had marked, but I</p>	36

37

1 haven't asked you about yet. It's 21?

2 A. Yes.

3 Q. Okay. Thanks. Exhibit 21 is an e-mail

4 that you had sent to Karl Pierson's mother in November

5 of 2013, right?

6 A. Yes.

7 Q. And it documents and describes the

8 incident that happened in your class, right?

9 A. Yes.

10 Q. Can you tell us why you sent this e-mail

11 to Mrs. Pierson?

12 A. Well, on that day, we were -- I was

13 teaching dia de los Muertos, which is day of the dead.

14 You know, it's a cultural thing.

15 Q. Sure.

16 A. And we watched a little video about the

17 celebrations of day of the dead in Mexico. And Karl

18 raised his hand, and I thought he had a question. And

19 then he said, So when can we start drinking tequila in

20 here? And several students said, That is really

21 disrespectful in Mrs. Lombardi's class. And he said

22 something disrespectful to them.

23 Q. Do you recall what?

24 A. He said F-you. So I walked over to his

25 desk, and I said, Karl, you may not talk like that in

38

1 class, I need that behavior to stop. And I think he

2 -- I'm not sure what he said. He gave me some sort of

3 response, and then I e-mailed his mom that afternoon.

4 Q. Okay. You didn't kick him out of the

5 class that day, did you?

6 A. I didn't.

7 Q. I take it he settled down after that

8 exchange?

9 A. Yes. And it was pretty soon -- I mean,

10 it was at the end of the class period.

11 Q. Oh, okay.

12 A. Because we studied the whole thing, and

13 it was just like just a few minutes left of class.

14 Q. And in your e-mail to Mrs. Pierson,

15 obviously you described the incident to her. You

16 never heard back from her as I understand it?

17 A. I did not.

18 Q. Did that strike you as odd?

19 A. Yes, because I always hear back from

20 parents.

21 MR. EVERALL: I'm sorry?

22 THE DEPONENT: I always hear back from

23 parents.

24 A. I write a lot of e-mails and parents

25 write me back.

39

1 Q. (BY MR. ROCHE) You didn't get a

2 bounceback or anything like that that said wrong

3 address?

4 A. No. No.

5 Q. You did not copy -- I guess, the e-mail

6 that I have is redacted, but do you recall, did you

7 copy anybody from the administration on this e-mail?

8 A. I did not.

9 Q. Okay. And did you report this incident

10 to the administration in any way?

11 A. I did not.

12 Q. One of the things that you tell

13 Mrs. Pierson about is that Karl's grade has been

14 sliding and it's now dropped to a very low C. Do you

15 see that?

16 A. Yes.

17 Q. Had he started off with a better grade

18 than that?

19 A. Yes.

20 Q. And did it drop slowly, gradually,

21 sharply?

22 A. It was fairly slowly. After I mailed

23 this -- or after I sent this e-mail on November 1, I

24 gave a huge preterit test like the next week, and he

25 bombed it, and then it dropped to an F. It was a big

40

1 preterit test.

2 Q. I'm sorry, what kind of test?

3 A. A preterit test. It's the past tense in

4 Spanish.

5 Q. Oh, okay.

6 A. It's like I ate tacos and things like

7 that.

8 Q. Okay. Katy would know that better than I

9 would.

10 A. Yes, she would. It's called the

11 preterit.

12 Q. Okay. So it had slipped slowly to a C

13 and then it dropped to an F --

14 A. Yes.

15 Q. -- after that test?

16 A. Yes.

17 Q. And did that concern you?

18 A. Yes. I called his mom, and I did not

19 write down the date. I called a bunch of parents over

20 a two- or three-day period. I always call parents

21 when their kid's grades drop to a D or F. And I

22 called his mom and left a message.

23 Q. Did she call you back?

24 A. She did not, but the very next day he

25 came in wanting to retake that test.

41

1 **Q. Okay. Did you have any conversations**
 2 **with him about why his grade had dropped so sharply?**
 3 A. Oh, yeah. He knew. I talked to him
 4 about it, and he had -- and I don't have access to his
 5 records anymore, but I think he had one missing
 6 assignment too. But when he came in to retake the
 7 test, it was a 49 percent. And I said, Karl, why
 8 don't you study a little bit before you retake this?
 9 And he said, No, I want to take it right now. And I
 10 said, Okay. So I gave it to him.
 11 **Q. Okay.**
 12 A. And he got a 49 again.
 13 **Q. Okay.**
 14 A. So his grade was still an F.
 15 **Q. Now, I've heard of incidents of Karl**
 16 **blowing up when he failed a test. Did that happen in**
 17 **your class with any of the tests that he failed?**
 18 A. When I went up to him and I said -- I had
 19 both of his tests, and I said very quietly, not in
 20 front of anyone -- and I said, Karl, this is your test
 21 that is a 49. Here is your other test. And I said,
 22 This is why I wanted you to study. And he said,
 23 C'est la vie. And that was it, which is French, not
 24 Spanish.
 25 **Q. Right. That one I got. So he did not,**

42

1 **in your view, seem concerned about the fact that he**
 2 **had just failed this test?**
 3 A. No, he was very lackadaisical.
 4 **Q. Okay. Did you ever talk to anybody in**
 5 **the administration about this tequila incident or the**
 6 **failed test prior to the shooting?**
 7 A. No, I didn't.
 8 **Q. Okay. Did you have any other behavioral**
 9 **or disciplinary incidents concerning Karl Pierson at**
 10 **any time between November 1 and the December 11**
 11 **incident --**
 12 A. No.
 13 **Q. -- other than the daily pay attention?**
 14 A. Right. Refocus, no.
 15 (Deposition Exhibit 22 was marked.)
 16 **Q. And Exhibit 22 is a progress report that**
 17 **was prepared as part of the sheriff's investigation.**
 18 **You probably haven't seen this before?**
 19 A. I have not.
 20 **Q. You will see in the bottom right-hand**
 21 **corner there's numbers and letters. It says ACSO and**
 22 **then a number?**
 23 A. Yes.
 24 **Q. I wanted to direct your attention to the**
 25 **page ACSO 1399. And you will see your name there.**

43

1 A. It's not spelled correctly, but that is
 2 it. It's not Victorie.
 3 **Q. And it's not Vicki with an E, is it?**
 4 A. Right. Exactly.
 5 **Q. Do you recall being interviewed by the**
 6 **sheriff's investigators following the shooting?**
 7 A. Yes.
 8 **Q. And this appears to me to be a**
 9 **typewritten summary of an interview that you gave to**
 10 **the sheriff's investigators. Is that what it looks**
 11 **like to you?**
 12 A. Yes. I give several, though. I gave one
 13 on 12/13 about two hours after the shooting.
 14 **Q. Okay.**
 15 A. And then I gave one on 12/18.
 16 **Q. And I think that this is the one on**
 17 **12/13. If you look at that front page, it says,**
 18 **"Action Date."**
 19 A. Yeah, this -- I saw mistakes in this.
 20 **Q. Okay. And I definitely want to hear if**
 21 **there are mistakes in it. So why don't we do this, I**
 22 **wanted to ask you -- like I told you, I was going to**
 23 **try to do this chronologically, just for ease of**
 24 **reference. But as we go through this, if you see**
 25 **mistakes, tell me, please. I wanted to direct your**

44

1 **attention to the next page, 1400, if you would. About**
 2 **three-quarters of the way down the page, there's a**
 3 **notation that says, "She has had discussions with**
 4 **Tracy Murphy because Karl's grades have slipped." Do**
 5 **you see that?**
 6 A. I do.
 7 **Q. Do you remember talking with Tracy Murphy**
 8 **about Karl's grades?**
 9 A. I don't. And when I read this for the
 10 first time yesterday, I really don't. I did go to
 11 Tracy Murphy, because he was the debate coach.
 12 **Q. Right.**
 13 A. And I had another one of his students
 14 that was dressing very provocatively, and I discussed
 15 it with him, and he told me he had the same issue and
 16 had to ask her to change her clothes at debate. But
 17 for the life of me, I can't remember talking about
 18 Karl's grades with him.
 19 **Q. Okay.**
 20 A. I'm sorry.
 21 **Q. It's totally okay.**
 22 A. I just don't remember. I do know that
 23 sometimes, when a coach's player is failing, I will go
 24 to them to say, Hey, can you talk to your -- he's not
 25 going to be eligible, talk to your kid and get them

45

1 back on board. But I just -- I don't remember doing
 2 that with Tracy. I just don't.
 3 **Q. That's okay. Let's talk about the**
 4 **incident on December 11. And obviously that is**
 5 **described in Exhibit 22. And if you'd like, I could**
 6 **also give you Exhibit 23, is what it would be marked,**
 7 **and this is, as I understand it, a statement you typed**
 8 **up shortly after --**
 9 A. Yes.
 10 **Q. -- the shooting?**
 11 A. On the 18th.
 12 (Deposition Exhibit 23 was marked.)
 13 **Q. To clarify for the record, can you tell**
 14 **us what Exhibit 23 is?**
 15 A. It is the statement that I gave the
 16 police, that I wrote for them on December 18, 2013.
 17 **Q. And the first page of it is an e-mail**
 18 **that you sent to Mr. Everall in late January of 2014?**
 19 A. Yes.
 20 **Q. Okay. And is that something that he had**
 21 **asked you for?**
 22 A. Yes.
 23 **Q. Thank you. Okay. Tell me what happened**
 24 **on December 11 in your Spanish class.**
 25 A. Well, Karl came to class before the bell

46

1 rang, and he said, Hey, Lombardi, can I fill up my
 2 water bottle? And where I am in C 20, the drinking
 3 fountain is just right around the corner. So I said,
 4 Okay, but hurry because we're starting the final
 5 review for the semester to get ready for the final.
 6 So we keep our doors locked now. Since Sandy Hook,
 7 our doors are always locked. But we have this
 8 metallic strip that we slide down over the keyhole so
 9 that kids can come and go to the bathroom or if they
 10 need a pass brought in or something.
 11 So that class is right after lunch. So I
 12 thought that I just forgot to move the strip down over
 13 the hole when I came in, and that happens. It's a
 14 standard thing to say, Hey, can you move the strip
 15 down? It's just a standard thing. Kids knock, and
 16 you let them in. So I thought that I forgot to unlock
 17 the door when this thing happened, but all of a sudden
 18 I was up in front of the room, the bell had rang,
 19 maybe a couple minutes before that, and all of a
 20 sudden there was this loud banging on the door that
 21 was so loud on the glass it really scared me. It
 22 scared my whole class. It was inappropriate banging.
 23 **Q. Okay.**
 24 A. Now, this says I let Karl in. I did not
 25 let Karl in, someone else did. So someone let him in.

47

1 I was still in the front, and he came in and he
 2 screamed, You locked me out. And I said, Karl, I
 3 said, No one locked you out, but your response is
 4 inappropriate or something like that. And he said it
 5 again, screaming at me. And I said, Are you serious,
 6 Karl? Because I just couldn't believe he was that mad
 7 over the door being locked. And he stared at me and
 8 said, As a heart attack. And my impulse was to say,
 9 Get your things and get out of my class.
 10 **Q. Were you scared?**
 11 A. It really scared me. I wasn't scared of
 12 him before then. I was scared of him that day. He
 13 really scared me, and it was just unsettling. It
 14 started with the banging on the door that scared me,
 15 and then him yelling. I've never had a student yell
 16 at me like that ever. I very, very seldom call 6,000.
 17 I have done it three times. The other two were for
 18 drugs, suspected drugs in my classroom, kids on drugs.
 19 So I got the kids started, I went outside in the
 20 hallway thinking he would be there so I could say,
 21 Inappropriate, Karl. You know, have a chat with him,
 22 and he wasn't there.
 23 **Q. And did that scare you?**
 24 A. Yes, because I'm responsible for my
 25 students when they're not in class. So right across

48

1 the hallway is my office, and I walked in and grabbed
 2 the phone and I called 6,000. And I said, I need an
 3 administrator at C 20. This is not right. It says
 4 that I was advised then that Cameron Rust had found
 5 Karl in the cafeteria, absolutely not. I didn't have
 6 time to say that. I said, I need an administrator to
 7 C 20.
 8 **Q. And --**
 9 A. And within -- and went back to class. I
 10 went back to class. Within a couple minutes, Kevin
 11 came in my door, Mr. Kolasa.
 12 **Q. Okay. Right. Now, let's break that**
 13 **down. When Karl was banging on your door, did it**
 14 **start as an ordinary polite knock and get louder as --**
 15 A. I didn't hear it as a polite knock. I
 16 know he wrote that. I do not remember him lightly
 17 tapping at all, and I normally do hear that. It was
 18 rapid banging on the door.
 19 **Q. Okay. So it was pretty loud?**
 20 A. It was very loud. The teacher next door
 21 came out to ask me what it was. When I went into the
 22 office, the teacher that was in there fifth hour said,
 23 What was that? You could hear it everywhere --
 24 **Q. Okay.**
 25 A. -- in the C hallway.

49

1 **Q. And when he started yelling, You locked**
 2 **me out --**
 3 A. Uh-huh.
 4 **Q. -- was that a -- to the best you can**
 5 **recall or characterize, are we talking about a raised**
 6 **voice, or are you talking about top-of-the-lungs**
 7 **screaming or somewhere in between?**
 8 A. Probably somewhere in between.
 9 **Q. Okay.**
 10 A. It was, You locked me out, like that.
 11 **Q. Okay. And were the students in your**
 12 **classroom scared as well that you could see?**
 13 A. Yes. Yes.
 14 **Q. Were you physically afraid?**
 15 A. No.
 16 **Q. Okay.**
 17 A. I was just unsettled. I was like, this
 18 kid is yelling at me, and my kids are looking at me
 19 like this with these big eyes, and I just felt like I
 20 needed to get him out of my class.
 21 **Q. And what about Karl's actions or demeanor**
 22 **led you to decide that you needed to do something**
 23 **you'd only done twice before in your career, which is**
 24 **dial the emergency number for the building?**
 25 A. Well, he wasn't -- because he wasn't --

50

1 he was gone. He wasn't outside the door. When we ask
 2 a student to step outside, right, they wait for you to
 3 come out and we say, Let's talk about this. What is
 4 your problem? He wasn't there. And he was so angry,
 5 and in my mind I thought is he going to get in his car
 6 and drive, because I'm responsible for him. That's
 7 why I called 6,000.
 8 **Q. Okay. Now, you said that you were**
 9 **advised -- well, I'm sorry, you said that the**
 10 **statement in the sheriff's report about Cameron Rust**
 11 **found Karl in the cafeteria --**
 12 A. That part is true.
 13 **Q. Okay. What part of it is wrong?**
 14 A. I wasn't advised when I called 6,000.
 15 When I called 6,000, all I said was -- to Paula Lewis
 16 was, I need an administrator to C 20. And then
 17 Mr. Kolasa came down, talked to me for, I think,
 18 around three or four minutes, maybe. And then he
 19 said, I'm going to go find Karl. And he left, and
 20 that's when Cameron had found him and took him to
 21 Mr. Kolasa's office.
 22 **Q. Okay. Got it. I appreciate that. Now,**
 23 **in the sheriff's progress report, it says that you**
 24 **told Mr. Kolasa that Karl scared you?**
 25 A. Yes. Not scares, scared.

51

1 **Q. Scared you, I'm sorry.**
 2 A. No, it says scares, but that's a mistake.
 3 It should be scared. I was talking about that
 4 incident.
 5 **Q. Okay. So it wasn't a more broad, I'm**
 6 **scared of this guy?**
 7 A. No. He was disrespectful, but I wasn't
 8 scared of him up until that day.
 9 **Q. Okay. And after that day, were you**
 10 **scared of him?**
 11 A. Well, I hadn't seen him -- except when he
 12 came to apologize to me, I had not seen him. This
 13 class was Monday, Wednesday, Friday.
 14 **Q. Okay. Got it. And what about the next**
 15 **statement that says, "She told Mr. Kolasa twice that**
 16 **day that Karl scares her"?**
 17 A. It should be scared.
 18 **Q. Okay. And what about the next statement?**
 19 **"She first told Mr. Kolasa when she came down after**
 20 **she called --**
 21 A. See, that's wrong. I didn't go down
 22 anywhere. It should be, She first told Mr. Kolasa
 23 when he came down that Karl scared me -- scared her.
 24 I didn't leave my classroom except to call 6,000, and
 25 then I went back.

52

1 **Q. Okay. The sheriff's report goes on to**
 2 **say that Mr. Kolasa -- and I understand they spelled**
 3 **his name wrong.**
 4 A. Yeah, several times.
 5 **Q. -- was on his phone, and told you that he**
 6 **wasn't ignoring you but was taking notes?**
 7 A. Yes.
 8 **Q. Tell me about your conversation with**
 9 **Mr. Kolasa when he came down. You said it was three**
 10 **or four minutes long?**
 11 A. Well, he came down twice.
 12 **Q. Well, let's --**
 13 A. So the first time is right after the
 14 shooting. I mean, right after the -- sorry.
 15 **Q. That's okay.**
 16 A. Right after the incident, and he walked
 17 in and got me. And we went out in the hallway, just
 18 the two of us and left my class with the door closed.
 19 And I told him what happened, and he said, I can tell
 20 you're scared, and I can tell your class is scared by
 21 the way they acted when I walked in. And the reason
 22 that stuck with me is because I thought how did my
 23 kids act, because he doesn't know my kids. I know my
 24 kids. I knew they were scared, but I just didn't know
 25 how he could tell when he walked in that they were

<p style="text-align: right;">53</p> <p>1 scared. It was just kind of a funny comment.</p> <p>2 Q. Okay.</p> <p>3 A. So then I told him what happened, and he</p> <p>4 was -- he had his phone in front of him, and he was</p> <p>5 typing. He said, I'm not ignoring you, keep talking,</p> <p>6 I'm taking notes. And he was taking notes on his</p> <p>7 phone. And then he said, I'm going to go and see if I</p> <p>8 can find Karl, and then I'll come back. And he left.</p> <p>9 Q. Okay.</p> <p>10 A. So maybe three -- I mean, I explained how</p> <p>11 -- what he said and how I acted, so maybe like three</p> <p>12 minutes.</p> <p>13 Q. All right. And then he came back --</p> <p>14 A. Sixth hour.</p> <p>15 Q. -- sixth hour?</p> <p>16 A. So he came back sixth hour. I was in the</p> <p>17 same classroom, C 20, and he opened the door, and we</p> <p>18 went back out into the hallway, and he said that</p> <p>19 Cameron Rust had found Karl in the cafeteria and he</p> <p>20 was screaming, Lombardi kicked me out or something</p> <p>21 like that. And then they went in his office and that</p> <p>22 Karl had calmed down, wrote that statement he did in</p> <p>23 front of Mr. Kolasa, and then he called his mom, he</p> <p>24 told me, and his mom wasn't concerned because he</p> <p>25 didn't cuss at me, so he told me that.</p>	<p style="text-align: right;">55</p> <p>1 11th, did Mr. Kolasa tell you that Karl had been the</p> <p>2 subject of a threat assessment earlier in the</p> <p>3 semester?</p> <p>4 A. No, absolutely not.</p> <p>5 Q. Before the shooting, did you have any</p> <p>6 idea that Karl had threatened to kill Tracy Murphy?</p> <p>7 A. No.</p> <p>8 Q. Do you know if that was widely known</p> <p>9 among the faculty at Arapahoe before the shooting?</p> <p>10 A. I know that no one in my department knew.</p> <p>11 Q. Okay.</p> <p>12 A. I don't know otherwise.</p> <p>13 Q. Okay. Tell me, if you would, about your</p> <p>14 conversation with Karl Pierson on the 12th when he</p> <p>15 came to apologize to you.</p> <p>16 A. Well, it was the very end of second hour,</p> <p>17 and I was sitting at my desk getting ready for third</p> <p>18 hour. And he walked up behind me and he said, Hey,</p> <p>19 Lombardi, I'm sorry I yelled at you yesterday. And I</p> <p>20 turned around and I said, Karl, I appreciate you</p> <p>21 coming in, and I forgive you, but you scared me and</p> <p>22 you scared the kids in the class and you need to get</p> <p>23 your anger under control. And he said something like,</p> <p>24 I know or I will. It was two words, and right then</p> <p>25 the bell rang and I don't know -- it was a short</p>
<p style="text-align: right;">54</p> <p>1 And then he said, Karl wants to apologize</p> <p>2 to you, but I told him to go home, and we looked up</p> <p>3 your schedule and saw you have second hour off, and he</p> <p>4 has second hour off, so he is going to come and</p> <p>5 apologize to you tomorrow. And he said, I didn't</p> <p>6 suspend him. And I said, Well, it probably wasn't</p> <p>7 suspendable, but I do think he owes me an apology.</p> <p>8 And then he was still taking notes on the phone and</p> <p>9 then he left. And I told him again, I said, He really</p> <p>10 scared me today, Kevin. I did tell him again the</p> <p>11 second time he came back.</p> <p>12 Q. That's in the sixth hour discussion?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And did you get the -- well,</p> <p>15 strike that.</p> <p>16 Did Mr. Kolasa tell you why he didn't</p> <p>17 start -- strike that.</p> <p>18 Did Mr. Kolasa tell you why he wasn't</p> <p>19 going to suspend Karl for the incident?</p> <p>20 A. No. And I didn't ask.</p> <p>21 Q. Okay. Did you get the sense that</p> <p>22 Mr. Kolasa was taking this as seriously as you would</p> <p>23 have liked him to take it?</p> <p>24 A. I did think he was.</p> <p>25 Q. Okay. When this all happened on the</p>	<p style="text-align: right;">56</p> <p>1 little response.</p> <p>2 Q. Okay.</p> <p>3 A. And that's the last time I saw him.</p> <p>4 (Deposition Exhibit 24 was marked.)</p> <p>5 Q. I don't know if this is something you've</p> <p>6 seen before. Exhibit 24 is something called a</p> <p>7 behavior detail report concerning Karl. Have you seen</p> <p>8 this type of behavior detail report before?</p> <p>9 A. Never.</p> <p>10 Q. I take it you didn't see the behavior</p> <p>11 detail report on Karl Pierson at any time prior to the</p> <p>12 shooting?</p> <p>13 A. Never. No.</p> <p>14 Q. You will see in this behavior detail</p> <p>15 report Kevin Kolasa submitted an entry concerning what</p> <p>16 happened in your class on December 11. Do you see</p> <p>17 that right at the top?</p> <p>18 A. Yes.</p> <p>19 Q. I don't see any reference in it to your</p> <p>20 being scared or your students being scared.</p> <p>21 A. No, you don't.</p> <p>22 Q. And I have heard or read documents that</p> <p>23 indicate that perhaps Mr. Kolasa doesn't recall you</p> <p>24 telling him that you were scared?</p> <p>25 A. Yes.</p>

57

1 **Q. Do you know what I'm referring to?**
 2 A. Yes.
 3 **Q. Tell me what you know about this**
 4 **discrepancy about whether you told Mr. Kolasa that you**
 5 **and your students were scared that day.**
 6 A. Well, I know he heard me because he said,
 7 I can tell you're scared, and I can tell your students
 8 are scared by the way they acted when I walked in. I
 9 absolutely said it. I said it more than once, and I
 10 am 100 percent sure about it.
 11 **Q. Okay. And how did you learn that**
 12 **Mr. Kolasa isn't sure that you told him that you were**
 13 **scared?**
 14 A. Because the detectives re-interviewed me
 15 and said am I certain I said it, and I said,
 16 Absolutely 100 percent, more than once.
 17 **Q. Okay. And does it bother you that**
 18 **Mr. Kolasa either denies that or doesn't remember you**
 19 **telling him --**
 20 A. Very much so.
 21 **Q. -- that you were scared?**
 22 A. Yes.
 23 **Q. And does that make you question whether**
 24 **Mr. Kolasa was taking this incident as seriously as**
 25 **you had initially thought he was?**

58

1 A. Yes, it does.
 2 **Q. Have you had any discussions with**
 3 **Mr. Kolasa about that?**
 4 A. No. Mr. Kolasa and I really never spoke
 5 second semester.
 6 **Q. And was that in part because of the**
 7 **disagreement you had about whether or not he took this**
 8 **incident seriously enough?**
 9 A. I have no idea. I just know that we
 10 didn't speak. The one time I spoke to Mr. Kolasa was
 11 February -- either the 27th or 28th when we were both
 12 called down to meet with the detectives to talk about
 13 the fact that Karl had written in his diary about us.
 14 And I got a phone call from Mr. Kolasa's secretary
 15 asking me to come down to the office, so I went down
 16 there. He was very upset, crying, and he said that he
 17 was sorry this happened and that he also had been
 18 written about or something. And he just wanted to
 19 tell me that he understood what I was going through or
 20 something like that and that was it.
 21 **Q. How long of a conversation was that?**
 22 A. Very short.
 23 **Q. Okay. Was there any discussion about who**
 24 **was going to say what to the detectives or anything**
 25 **like that?**

59

1 A. Absolutely not. I never discussed
 2 anything I told the detectives with Mr. Kolasa.
 3 **Q. Have you ever had any discussion with**
 4 **Ms. Pramenko about these incidents?**
 5 A. Yes.
 6 **Q. Tell me about those conversations.**
 7 A. I told her the same thing that I told
 8 Kevin Kolasa. I told her that Karl had scared me.
 9 This was after the shooting though. I didn't talk to
 10 her before the shooting.
 11 **Q. And I appreciate that clarification. Had**
 12 **you ever talked to Ms. Pramenko about Karl Pierson**
 13 **prior to the shooting?**
 14 A. Never.
 15 **Q. Now, tell me if you would, just so we're**
 16 **clear, this is after the shooting you had --**
 17 A. Yes. Sorry.
 18 **Q. -- a conversation with her?**
 19 A. Yes.
 20 **Q. Tell me about that conversation, if you**
 21 **would.**
 22 A. Well, she called me several times. She
 23 called me on Saturday night after the shooting to
 24 check on me, and then she said, When I was at the
 25 church, the kids were saying that Karl came to your

60

1 door. And I said, Absolutely not. I said, That was a
 2 police detective. And she said, Well, the rumor is
 3 going around that he came to your door. And I don't
 4 know where that started. The police officer did shake
 5 my door, but it was long after the last gunshot. And
 6 then I've talked to her several times about what
 7 happened that day. I -- she knew I -- I told her that
 8 I was scared of him that day. We've had several
 9 conversations about it.
 10 **Q. Okay. Did you have any conversations**
 11 **with Ms. Pramenko about your perception that**
 12 **Mr. Kolasa had not taken the incident on December 11**
 13 **as seriously as he should have?**
 14 A. I think I did. I can't remember exactly,
 15 but I remember -- because I was upset about that
 16 because I made that very clear to him. And obviously
 17 by him saying, I can tell you're scared, I can tell
 18 your class is scared by the way I walked in, he heard
 19 me. And so I did tell Natalie that I was disappointed
 20 about that.
 21 **Q. And do you recall what, if anything, she**
 22 **said about that or anything that she was going to do**
 23 **about that?**
 24 A. No. I remember thinking that she's
 25 protecting -- or she's an administrator with Kevin. I

61	<p>1 felt like she didn't bad-mouth Kevin in front of me, 2 is what I'm trying to say. 3 Q. So she was trying to protect Kevin and -- 4 A. Yeah, she didn't -- 5 Q. So she was trying to protect Kevin and 6 his role? 7 A. She didn't -- I don't know what the word 8 is. She didn't -- yeah, she didn't -- all I can say 9 is I didn't -- she didn't bad-mouth Mr. Kolasa in 10 front of me. 11 Q. Did she tell you she was going to discuss 12 that issue and your concerns with Mr. Kolasa? 13 A. No. 14 Q. And Mr. Kolasa no longer works at 15 Arapahoe High School, right? 16 A. That's right. 17 Q. Do you have any understanding of why he 18 left? 19 A. Just what I was told. 20 Q. What were you told? 21 A. That he was -- he would rather work in 22 middle school. 23 Q. As long as it wasn't by counsel, 24 Ms. Gomez -- 25 MR. EVERALL: No, I mean, let's just lay</p>	63
62	<p>1 a foundation as to who told Vicki here and what. 2 Q. (BY MR. ROCHE) What were you told and by 3 whom about Mr. Kolasa's departure from Arapahoe? 4 A. Well, I think it was at our 5 end-of-the-year luncheon. I think that's what we were 6 told that he really prefers middle school. 7 Q. Okay. Do you recall who told you that? 8 A. I think it was Natalie. I think it was 9 Natalie addressing the staff. 10 Q. All right. 11 A. We always say goodbye to people that are 12 leaving, you know, retirees. And she just said, Kevin 13 has taken a job at Euclid, and he prefers to work with 14 middle schoolers. 15 MR. ROCHE: Let's go ahead and mark this. 16 (Deposition Exhibit 25 was marked.) 17 Q. (BY MR. ROCHE) Exhibit 25 is a student 18 statement that appears to be written by Karl Pierson 19 about the incident that happened in your classroom on 20 December 11. Do you see that? 21 A. Yes. 22 Q. Is this something that you were provided 23 at or about that time? 24 A. By the detectives. 25 Q. So after the shooting?</p>	64
	<p>1 A. Yes. 2 Q. You hadn't seen this before then? 3 A. No. 4 Q. Are these types of students -- student 5 statements something that you would, as a teacher, 6 typically see after an incident in your classroom? 7 A. This is the first one I've seen. 8 Q. Okay. Are these types of statements that 9 describe a student's perspective on something that 10 happens in your classroom, something that you think 11 would be helpful and useful for the teachers to see? 12 A. Yes. 13 Q. And why is that? 14 A. Well, I'm not sure, but anytime you read 15 a student's perception of what happened in your class, 16 it's going to be helpful. You know, this one is 17 pretty good, except I would have never let him bang on 18 the door for a half a minute to a minute. It was like 19 five seconds. I would never have disrupted the school 20 that way, and he left off a few things I said to him. 21 But it's pretty accurate. 22 Q. Okay. And do you know, has the policy at 23 Arapahoe changed with respect to giving teachers 24 access to these types of student statements since the 25 shooting?</p>	
	<p>1 A. I don't know. I still have not seen one. 2 This is the only one I've ever seen. 3 Q. Okay. When Kevin Kolasa was talking to 4 you on the 11th, he was taking his notes on his phone, 5 right? 6 A. He told me he was taking his notes on his 7 phone. I didn't actually see them. 8 Q. Okay. 9 A. He had it in front of his face and he was 10 typing. 11 Q. Okay. He wasn't writing anything down in 12 a spiral notebook? 13 A. There was nothing handwritten. 14 Q. Okay. And if I understand your 15 testimony, you said you were scared of Karl on the 16 11th? 17 A. Yes. 18 Q. But not physically afraid of him -- 19 A. No. 20 Q. -- is that right? 21 A. Yes. 22 Q. Okay. Were you -- after the shooting, 23 students were allowed back in the school to gather up 24 their belongings? 25 A. Yes.</p>	

65

1 **Q. And that happened over the course of two**
 2 **days, right?**
 3 A. Yes.
 4 **Q. Juniors and Seniors were there one day?**
 5 A. Thursday and Friday, right.
 6 **Q. And then the freshman and sophomores came**
 7 **back that Friday?**
 8 A. Yes.
 9 **Q. And were you there both of those days?**
 10 A. Yes.
 11 MR. ROCHE: Let's mark this, if you
 12 would.
 13 (Deposition Exhibit 26 was marked.)
 14 **Q. (BY MR. ROCHE) Now, Exhibit 26 is,**
 15 **again, probably not a document that you've seen**
 16 **before?**
 17 A. No, never.
 18 **Q. It's a document prepared by somebody from**
 19 **the Colorado Bureau of Investigation?**
 20 A. Yes.
 21 **Q. And it's an investigative supplemental**
 22 **report?**
 23 A. Yes.
 24 **Q. You will see on page 2 of Exhibit 26 that**
 25 **there's a description of what the agent did at**

66

1 **Arapahoe High School on December 18, correct?**
 2 A. Yes.
 3 **Q. And you were there for that day?**
 4 A. Yes.
 5 **Q. On page 2, the agent has written that "It**
 6 **was also made evident through the school board members**
 7 **present at the high school that they were very upset**
 8 **law enforcement was present to speak with staff as**
 9 **they had not been notified we were going to be there."**
 10 **Do you see that?**
 11 A. Yes.
 12 **Q. Do you recall anything about that issue?**
 13 A. Yes.
 14 **Q. Tell me what you know about that issue.**
 15 A. Ms. Pramenko told me that she was upset
 16 that they were there.
 17 **Q. And did she tell you why she was upset**
 18 **that they were there?**
 19 A. No. No.
 20 **Q. Did you discuss the fact that law**
 21 **enforcement was at the school that day with anybody**
 22 **other than Mrs. Pramenko?**
 23 A. Not that I remember, but I was with the
 24 detectives for over two hours that morning in a room
 25 by myself.

67

1 **Q. And was that at the sheriff's office or**
 2 **at school?**
 3 A. That's was at C 20 in my classroom.
 4 **Q. Okay. And that was the day that you gave**
 5 **them the written statement --**
 6 A. Yes.
 7 **Q. -- that we just looked at --**
 8 A. Yes.
 9 **Q. -- and they were asking you about it?**
 10 A. Yes. No. I gave the written statement
 11 that evening. I wrote it that evening.
 12 **Q. Oh, okay.**
 13 A. They just interviewed me that day.
 14 **Q. Okay. Got it. And that was before the**
 15 **kids came in?**
 16 A. Yes. They came Thursday and Friday.
 17 This was Wednesday, the 18th.
 18 **Q. Oh, I'm sorry. So there was a staff**
 19 **only --**
 20 A. That was Monday.
 21 **Q. That was -- all right. Tell me about**
 22 **that. Tell me what happened on Monday, the 16th.**
 23 A. We met at Ames Elementary School --
 24 **Q. Okay.**
 25 A. -- for an all-staff meeting. They had

68

1 breakfast and the sheriff was there and Scott Murphy
 2 and the administrators. And I'm going to be honest
 3 with you, I was so traumatized, that I do not remember
 4 that meeting. I remember very little to none of that
 5 meeting.
 6 **Q. Okay. Understandably, actually. What**
 7 **about on the 18th, which is the day we're talking**
 8 **about?**
 9 A. Yes.
 10 **Q. Who was at the school on that Wednesday?**
 11 A. The FBI, the CBI, Arapahoe County, those
 12 are the ones I know for sure.
 13 **Q. Okay.**
 14 A. And I know that because the CBI and the
 15 FBI agents interviewed every one of my students for
 16 two days.
 17 **Q. And who from either Littleton Public**
 18 **Schools or Arapahoe High School was at the school on**
 19 **December 18?**
 20 A. There were so many people, I don't know.
 21 They had health workers there. Every teacher had a
 22 counselor with her --
 23 **Q. Okay.**
 24 A. -- to talk to. There were board members.
 25 Mr. Booth was there. There were so many people there.

69

1 I don't know.

2 **Q. But it was all of the faculty?**

3 A. Yes.

4 **Q. All of the administrators?**

5 A. Yes.

6 **Q. A bunch of law enforcement folks?**

7 A. Yes.

8 **Q. A bunch of school board folks?**

9 A. Yes.

10 **Q. And a bunch of counselors and mental**

11 **health professionals?**

12 A. Yes.

13 **Q. But not the students?**

14 A. No.

15 **Q. They came the next two days?**

16 A. Right.

17 **Q. Okay. And Ms. Pramenko told you that she**

18 **was upset that law enforcement was at the school on**

19 **December 18, right?**

20 A. Yes.

21 **Q. And she didn't tell you why or you don't**

22 **remember why?**

23 A. I don't remember.

24 **Q. Okay.**

25 A. I don't remember.

70

1 **Q. In this investigative supplement, the**

2 **agent has written, "It was later determined by the**

3 **school board that law enforcement should not be in the**

4 **hallways or cafeteria of the school, but rather in the**

5 **theatre/auditorium of the school." Do you see that?**

6 A. I do.

7 **Q. Do you recall all of the law enforcement**

8 **gathering in the theater rather in the hall or the**

9 **cafeteria?**

10 A. I never saw that.

11 **Q. What did you see to the extent you**

12 **remember?**

13 A. On the Wednesday, the 18th?

14 **Q. Yes.**

15 A. Well, I was in my classroom for over two

16 hours, and then the detectives wanted to -- they had

17 the map of what Karl -- can I back up for a second?

18 **Q. Of course.**

19 A. The first thing they did was tell me I

20 was a target, and then -- that was pretty

21 traumatizing. So we spent some time talking about

22 that, and then they interviewed me. It was a good --

23 it was a long time. I don't know for sure. And then

24 they had a map of the school, and they had me walk

25 through the school to show me where all the classrooms

71

1 were of the rooms on his arm. And so as we walked

2 through there, there were lots of people milling

3 around, but I don't -- I just didn't pay attention to

4 where they were. Sorry.

5 **Q. That's okay. What I'm interested in is**

6 **this last note on the 18th where it says, "It should**

7 **be noted that no members of the teaching staff or**

8 **administrators came to the theatre/auditorium that day**

9 **to be interviewed." Do you see that note there?**

10 A. I do.

11 **Q. Do you recall on the -- obviously you**

12 **talked to law enforcement on the 18th?**

13 A. Yes.

14 **Q. Do you recall any discussions with the**

15 **LPS personnel or the Arapahoe administration about**

16 **whether staff and faculty should reach out to law**

17 **enforcement to tell them what they knew about what had**

18 **happened?**

19 A. No. I knew nothing about this. I didn't

20 know about the theater/auditorium, I don't know

21 anything about that.

22 **Q. Okay. Did the faculty at Arapahoe have**

23 **any kind of debriefing meeting after the shooting to**

24 **discuss what lessons could be learned about school**

25 **safety from this tragedy?**

72

1 A. We had lots of meetings.

2 **Q. Okay. And during those meetings, were**

3 **there discussions about what lessons there were to be**

4 **learned from this tragedy?**

5 A. I don't know that they were worded that

6 way, "lessons to be learned." We made the change with

7 the contact log to keep track of contact we made with

8 the parents on Infinite Campus so we could all see it.

9 And then we were able to -- they changed -- you know,

10 redefined a little bit of FERPA, so we were still

11 working within the confines of FERPA. But we were

12 able to discuss students with other teachers, and I

13 think that's it.

14 **Q. Okay.**

15 A. That I can remember.

16 **Q. Do you have a perception since the**

17 **shooting that the administrators at Arapahoe are**

18 **reluctant to acknowledge any mistakes that may have**

19 **occurred in connection with this shooting?**

20 MR. EVERALL: Object to form.

21 **Q. (BY MR. ROCHE) You can go ahead and**

22 **answer.**

23 A. I'm sorry. Can you state it again?

24 **Q. Sure. Do you have a sense or a**

25 **perception that the administrators at Arapahoe or LPS**

73

1 are reluctant to acknowledge any mistakes that may
 2 have occurred with respect to this tragedy?
 3 MR. EVERALL: Same objection.
 4 A. The information I have is based on what
 5 you've seen in the media.
 6 Q. (BY MR. ROCHE) Okay.
 7 A. So based on that, yes.
 8 Q. And have you had any discussions with
 9 anybody from Arapahoe or LPS about that reluctance and
 10 what we've seen in the media?
 11 A. No.
 12 Q. Okay. Sorry, I'm going to go off on just
 13 a bit of a tangent here.
 14 A. Okay.
 15 Q. We all know that Karl entered the school
 16 through the north doors into the trophy hallway,
 17 right?
 18 A. Yes.
 19 Q. And we also know that those doors were
 20 unlocked on the day of the shooting. Do you know, was
 21 that a common occurrence?
 22 A. I do not know.
 23 Q. Had you ever expressed a concern about
 24 those doors being left open to anyone?
 25 A. No, because I wasn't aware that they

74

1 were.
 2 Q. Okay.
 3 MR. EVERALL: Mike, you've kind of wore
 4 me out. It's been about an hour.
 5 MR. ROCHE: It is, and I'm happy to take
 6 a break.
 7 Q. (BY MR. ROCHE) But I will tell you --
 8 and frankly I'll tell you, I am ending all of my
 9 depositions in this case the same way. And it's by
 10 asking you -- and I'm happy to take the break, but I'm
 11 going to give you a preview. What do you think can be
 12 done and what changes would you like to see to improve
 13 school safety? So I will leave it to the group if you
 14 want to take five minutes and take a break, that's
 15 fine, but I will tell you that's going to be the next
 16 question I ask you.
 17 MR. ROCHE: Let's take a break.
 18 (Recess taken, 3:37 p.m. to 3:48 p.m.)
 19 MR. ROCHE: Back on the record.
 20 Q. (BY MR. ROCHE) Ready to keep going?
 21 A. Yes.
 22 Q. Great. Well, as I said, I wanted to
 23 finish up my questions of you to find out -- because
 24 you're one of the people who is in there with the kids
 25 every day.

75

1 A. Yes.
 2 Q. And, again, your devotion to the kids is
 3 very evident.
 4 A. Thank you.
 5 Q. I want to know from you what changes you
 6 would like to see to improve school safety and the
 7 school's ability to help kids in crisis because that's
 8 what going to come out of this arbitration is
 9 recommendations about those very issues.
 10 A. I think that we need to work on
 11 communication. For instance, I had an incident in May
 12 of 2014. I had a student that was in the same class
 13 with Karl who had been increasingly disrespectful the
 14 last part of the semester. And I had him for two
 15 years. He retook me -- he took me his sophomore year
 16 and took me again his junior year.
 17 On May 2, we had a particularly bad day.
 18 He was coloring. He was just being very rude to me in
 19 the class. I would call on him, and he would say
 20 something very rude. And so I e-mailed his mom that
 21 afternoon, and I told her the situation. And I said
 22 it had been getting increasingly worse to the point
 23 where I needed to contact her. And she wrote me back
 24 and she said, Can we talk on the phone? And I got it
 25 as soon as I got home and so I called her.

76

1 And she said, you know, that she was
 2 sorry and that that wasn't normally how he acted. But
 3 she said, I don't want to scare you or worry you, but
 4 he blames the school shooting on you and said that
 5 everyone does. And he's been exhibiting questionable
 6 behaviors at home like sitting in his room, listening
 7 to strange music. She gave me a whole bunch of
 8 things. And she said, I know he's doing illegal drugs
 9 and I'm in, I think she said, Washington, D.C., some
 10 place back east, and tomorrow is prom, and I won't be
 11 able to talk to him about this until Sunday.
 12 So she also said that this young man was
 13 angry with Ms. Pramenko for firing Cameron Rust,
 14 because that's what he thought, is he was fired. So I
 15 got off the phone. I talked to my husband and he
 16 said, I think you need to call Natalie. So I called
 17 Ms. Pramenko, and I told her the story, and I said,
 18 I'm very concerned about this young man and she was
 19 too. And she said, I want you to call Darrell
 20 Meredith right now. By this time it's 7:30 or
 21 8 o'clock on a Friday night. Wait, it was later than
 22 that because Natalie didn't call me right back because
 23 they were setting up prom. They were at the school
 24 doing after prom stuff.
 25 So by the time I finally got ahold of

77

1 Darrell, it was like 9:00. And I apologized, and I
 2 said I'm so sorry to call you, but I'm really
 3 concerned about this student. I told him the story,
 4 and he goes, Well, what do you want me to do about it?
 5 And I said, Well, I'm just concerned about it. I
 6 wanted to make you aware of it. His mom is not
 7 around, and I'm scared. And I said based on what
 8 happened in December, I am hopefully overreacting, but
 9 I am very sensitive to this. And he said, I can't do
 10 anything. I'll look for him at prom, and I didn't
 11 hear anything else.

12 So on that Sunday night, the 4th -- or I
 13 think it was Sunday morning, I wrote an e-mail to -- I
 14 looked up on his grades, and I saw he was failing two
 15 other classes. And you have those e-mails. And I
 16 wrote an e-mail to the teachers, and I explained what
 17 happened. And I said, I'm reaching out to you because
 18 I see he's failing your classes as well, and I want to
 19 know if you're seeing the same behaviors. And one of
 20 them wrote me back, and wrote in my e-mail that I had
 21 asked for a threat -- I want him removed from my
 22 class, and I wanted a threat assessment done.

23 So Monday morning I was in Mr. Meredith's
 24 office at 6:15 in the morning, and so was
 25 Ms. Pramenko. I was balling. I was so upset because

78

1 I wanted something done with this kid, and I didn't
 2 want him coming to fifth hour. So Natalie wanted him
 3 suspended. She said, I want him suspended right now
 4 for insubordination. And Mr. Meredith said, I can't
 5 suspend him, he didn't threaten you. And I said,
 6 Neither did Karl. And he said -- and I -- he made it
 7 very clear to me that the school policy was that he
 8 was unable to suspend him.

9 So he said, I will tell you that he won't
 10 be in your class fifth hour, and we'll take care of
 11 this and put him in another class. So I left, taught
 12 my first hour, and I had second hour off. And so
 13 Christina Kolk came to see me second hour, and she
 14 said, I don't want to scare you, but I saw this young
 15 man before school, and he didn't show up for first or
 16 second hour. So I was told by administration to come
 17 down and tell you that we're looking for him and that
 18 you need to lock the office doors. And so I did. And
 19 I'm the only one in the office second hour. I thought
 20 about going home, but I stayed there.

21 And then I went to the bathroom right
 22 before third hour. Christina Kolk came and said, I'm
 23 going to walk you to class. I said, Okay. She walked
 24 me to class. And I did ask that morning -- I asked to
 25 have Deputy Englert around my classroom which was S 5

79

1 because we switched after the shooting from C 20 to
 2 S 5.

3 **Q. Right.**

4 A. And he was -- he came around, he checked
 5 on me fourth hour, and then they came and told me that
 6 they had found (THE STUDENT), and they were having a
 7 meeting with his parents at 12:15, which is the time
 8 during my fifth hour. So I was okay. I said, Okay.

9 And I went to start my class before the
 10 bell rang, and I was putting my agenda on the board.
 11 And I turned around, and that young man is sitting in
 12 his seat. I immediately got my stuff, and I walked
 13 out of the classroom down the hallway where I ran into
 14 Mr. Sisler and Mr. Rod Mauler, the security guard, and
 15 I said, He's in my class, please get him out. They
 16 went down and took him out, took him down to the
 17 office, and I had my class and taught sixth hour.

18 Well, I was told that they -- during the
 19 meeting, they did a threat assessment on him, and then
 20 that afternoon, Mrs. Pramenko called me and said, I
 21 want you to know that this person has been suspended
 22 for tomorrow because we told him to go to sixth hour,
 23 he slammed the conference room door, and so he has
 24 been suspended for tomorrow. So he won't be at
 25 school. I didn't have him at class on that Tuesday

80

1 anyway, but she said he's not going to be at school.

2 So I came to school the next day, and
 3 this is what I don't -- I don't remember exactly what
 4 day this was, but the guidance counselor came up to me
 5 when I was standing in front of my door to start
 6 teaching and said, Hey, just so you know, we did a
 7 threat assessment on (THE STUDENT), and he does have
 8 some triggers. He's very angry with you and his dad,
 9 and he can't tell us why, but I think you're okay and
 10 he walked off.

11 **Q. And did that --**

12 A. So -- sorry, go ahead.

13 **Q. And did that incident give rise to**
 14 **concerns in your mind that Mr. Meredith or other**
 15 **members of the administration were still not taking**
 16 **student threats or student safety as seriously as you**
 17 **would have liked?**

18 A. Yes. I was upset. And the next day,
 19 Tuesday, when (THE STUDENT) -- sorry, when this young
 20 man --

21 MS. GOMEZ: She said his name twice now.
 22 THE DEPONENT: I'm sorry.
 23 MS. GOMEZ: Can you say "student" instead
 24 of the name, because we don't have a protective order.
 25 MR. ROCHE: Yes, of course.

81

1 A. I'm so sorry. I'm trying not to.

2 **Q. (BY MR. ROCHE) That's okay. And we'll**

3 **fix that after the fact.**

4 MS. GOMEZ: We'll fix it when we get an

5 opportunity.

6 **Q. (BY MR. ROCHE) No, it's okay. And just**

7 **as a part of housekeeping, you'll have the**

8 **opportunity, and so will Ms. Gomez, to review this**

9 **transcript before it's finalized and make changes and**

10 **edits and that kind of thing.**

11 A. Thank you. I don't want his name in

12 there.

13 **Q. No, you're totally fine.**

14 A. So fifth hour --

15 **Q. The next day?**

16 A. No, on Tuesday when he was supposed to be

17 suspended --

18 **Q. Okay.**

19 A. -- he came up to me, behind me, and

20 handed me some missing work. And I typed Ms. Pramenko

21 and I said, I thought he was suspended? And she said,

22 Oh, we didn't suspend him, he apologized, and I forgot

23 to tell you and you're okay. I'm sorry if that scared

24 you, but we'll discuss it later. And she did

25 apologize profusely and said she was sorry.

82

1 Well, then the next day, he was being

2 transferred out of my class, and he was going into my

3 coworker's class. And I did tell my coworker the

4 situation, and I did say that there had been a threat

5 assessment done on him. So this teacher goes to

6 class, and this boy just shows up in his class. No

7 one ever told him that he was going to his class. And

8 so he called 6,000 and said, I've got a young man

9 sitting here, because he shouldn't -- he felt like he

10 shouldn't hear it from me. And somebody came down,

11 and I don't know who, and said, I'm sorry, so-and-so

12 was supposed to tell you that he's in your class for

13 the rest of the semester.

14 **Q. Okay. And all of that points to, it**

15 **sounds like, two things in your mind, so correct me if**

16 **I'm wrong. One, is it's your belief that the**

17 **communication at the school about school safety has to**

18 **be much, much better?**

19 A. Yes. And when I got -- because I wrote a

20 referral for him because I didn't -- I wrote a

21 referral right away and explained what happened. And

22 some of my students came to me and said that he was

23 calling me names in the back of the classroom, like

24 really awful names. So they interviewed those girls.

25 I never saw the interviews. They didn't tell me about

83

1 the interview, the students told me.

2 But I wrote a referral, and when the

3 referral came back, it said that they had had a

4 meeting. It did not say a threat assessment was done.

5 I was just told it was done. But it said there was a

6 meeting with the parents, the student, the counselor,

7 and the psychologist, but I know Mrs. Pramenko was

8 also in the meeting, because she's the one who told me

9 some of the things that (THE STUDENT) said -- sorry,

10 the student, and then my understanding after the

11 shooting is that if we did a threat assessment, there

12 was supposed to be teachers there, because it doesn't

13 make sense to me, in my mind, to do a threat

14 assessment with people who don't know the student. So

15 after --

16 **Q. Why not?**

17 A. Because the administration doesn't know

18 the student, the counselors have 500 kids. We know

19 our students. I know all of my students very well.

20 That's what I take pride in is knowing my kids. And

21 so if we give a threat assessment, and we don't have a

22 teacher involved, I don't think it's a good

23 assessment.

24 **Q. Okay.**

25 A. And if they did a threat assessment and

84

1 they told me they did, there were no other teachers

2 involved.

3 **Q. Okay. And that's another -- I take it**

4 **that would be another recommendation that you would**

5 **like to see adopted at the school?**

6 A. Well, I was told it was. We were told

7 when we had our training on threat assessments that

8 there would be teachers involved in the threat

9 assessment. I personally in my seven years have never

10 had a threat assessment, never asked for one except

11 for this one in the spring. I didn't know anything

12 about the other ones. But I have never sat in one. I

13 have never been a party to one. I have seen the form

14 at a training and that's it.

15 **Q. Okay. Have you discussed with other**

16 **teachers whether or not they've participated in threat**

17 **assessments on students?**

18 A. I know one teacher in my world language

19 department that did one this past spring, yes.

20 **Q. Okay. What other improvements or changes**

21 **would you like to see the school make to enhance**

22 **student and faculty safety and the attention given to**

23 **kids in crisis? Better communication is obviously**

24 **one?**

25 A. Better communication is huge because --

85

1 **Q. Right.**
 2 A. -- it would encompass a lot of things.
 3 **Q. Absolutely. And my question is what else**
 4 **would you like to see done?**
 5 A. One of the things that I would like to
 6 see done -- within the confines of FERPA, I understand
 7 we have to work under FERPA.
 8 **Q. Sure.**
 9 A. But in my mind, it doesn't make sense if
 10 another teacher has a student that they feel is
 11 threatening and going to hurt themselves or hurt
 12 someone else, and they ask for a threat assessment or
 13 a threat assessment is done, I'm not going to know
 14 about that, even though that student might be -- have
 15 his locker outside of my classroom or might be best
 16 friends with one of the students in my class or any
 17 number of things. I think there should be a way that
 18 we know of every student in trouble in that school.
 19 **Q. Okay.**
 20 A. And I don't know if that's possible. But
 21 it's a big school and there's a lot of kids. And I
 22 think the more of us that are watching after these
 23 sweet creatures, that we could do a lot better.
 24 **Q. Anything else?**
 25 A. No, I don't think so.

86

1 **Q. Okay. I think that's all the questions**
 2 **that I've got for you. I know that Mr. Everall**
 3 **probably has some. And this isn't a question, but it**
 4 **is something I want to tell you. I heard you say that**
 5 **there was this young man who blames you for the**
 6 **shooting. I can tell you, Mike and Desiree do not,**
 7 **and you need to know that.**
 8 A. Thank you.
 9 MR. ROCHE: Do you want to trade seats?
 10 MR. EVERALL: Sure.
 11 EXAMINATION
 12 BY MR. EVERALL:
 13 **Q. So how are you doing?**
 14 A. It's a little stressful. In 54 almost
 15 years in a couple of weeks, I have never done one of
 16 these.
 17 **Q. But you're a cross-country runner, aren't**
 18 **you?**
 19 A. I am.
 20 **Q. Do you still do that?**
 21 A. I don't coach anymore, because the
 22 running four days a week, I'm just too old. But I run
 23 on my own. I ran a half marathon last summer, my
 24 third one and, yeah, I still like to run.
 25 MR. ROCHE: That was always my favorite

87

1 distance. Marathons are too long.
 2 THE DEPONENT: Well, the half marathon I
 3 did was up in Georgetown.
 4 MR. ROCHE: Oh, that's a great one.
 5 THE DEPONENT: I did it with my
 6 24-year-old daughter.
 7 MR. ROCHE: You have a 24-year-old?
 8 THE DEPONENT: Yes, well, she's 25 now.
 9 MR. ROCHE: I would have never guessed
 10 that.
 11 THE DEPONENT: Oh, yeah, right. I'm
 12 going to be 54 in a couple of weeks, but running is so
 13 therapeutic, it truly is. It's just kind of hard on
 14 my body.
 15 **Q. (BY MR. EVERALL) Well, I'm glad you're**
 16 **here too.**
 17 A. Thank you.
 18 **Q. And glad to meet you.**
 19 A. Thank you. Nice to meet you too.
 20 **Q. And I enjoyed talking to you that one**
 21 **time we did.**
 22 A. Several times.
 23 **Q. That's right. It was two times, wasn't**
 24 **it?**
 25 A. Yep.

88

1 **Q. You know, just some clarifying detail**
 2 **questions. As I understand it, that written report**
 3 **that's exhibit whatever that you prepared, typed**
 4 **written --**
 5 A. Yes.
 6 **Q. -- December 18?**
 7 A. Yes.
 8 **Q. You had that available and gave that to**
 9 **the police?**
 10 A. No.
 11 **Q. How did that all come out?**
 12 A. They interviewed me Wednesday morning for
 13 a couple hours and then --
 14 **Q. Could I interrupt?**
 15 A. Yes.
 16 **Q. Who interviewed you? Do you recall? Was**
 17 **it --**
 18 MS. GOMEZ: Can I interrupt? You're
 19 referring to this Exhibit 23? This one?
 20 MR. EVERALL: Well, whatever it is.
 21 MS. GOMEZ: Just for the record, that's
 22 what you're referencing, that's the right document.
 23 A. It was Officer McCauley and officer --
 24 **Q. (BY MR. EVERALL) Himes or something like**
 25 **that?**

89

1 A. Yes. Yes. Those two.
 2 **Q. So did you ever speak to the CBI or FBI**
 3 **people?**
 4 A. Yes.
 5 **Q. Okay. When did you speak to them?**
 6 A. I mean, it wasn't like an interview, but
 7 they interviewed my students, and I never left the
 8 classroom when my students were being interviewed. So
 9 they had like four of them there, and they kind of
 10 chatted with me.
 11 **Q. When was that?**
 12 A. The Thursday and Friday when the kids
 13 came to get their backpacks.
 14 **Q. And then you had the second interview**
 15 **with the Arapahoe County Sheriff people?**
 16 A. Well, the first interview was the day of
 17 the shooting, that was with someone I don't know. I
 18 don't know who it was. I barely remember talking to
 19 her. I was sitting on a step in the back of the
 20 church, that's about all I remember.
 21 **Q. Is that -- now that wasn't --**
 22 A. That's the one that's incorrect.
 23 **Q. Oh, you went through that?**
 24 A. Yeah, that's the one that is not done
 25 correctly. And I literally found out it was Karl, and

90

1 they came and got me and told me they needed to talk
 2 to me. And I just wanted to stay with my students. I
 3 was so frazzled, and they dragged me away, and I don't
 4 really remember it.
 5 **Q. So did you ever actually give Exhibit 23,**
 6 **the written report, to anybody?**
 7 A. Yes. She asked me to e-mail it to her
 8 that night, so that's what I did. I went home and
 9 wrote it, she said, E-mail it to me, so I did.
 10 **Q. And that was the interview -- that**
 11 **followed the interview on December 18?**
 12 A. Yes.
 13 **Q. Okay.**
 14 A. I had not done a statement before that
 15 that I wrote.
 16 **Q. Okay. Just a couple of questions on this**
 17 **threat assessment of this other student.**
 18 A. Uh-huh.
 19 **Q. You didn't participate in that?**
 20 A. No.
 21 **Q. Did you ask to participate in it?**
 22 A. No. I was teaching. Actually, I don't
 23 -- I think that they did it based -- they were
 24 planning on having a meeting with the parents at
 25 12:15, and whatever happened at that meeting, they

91

1 decided to do the threat assessment after that. And I
 2 teach fifth and sixth hour. I didn't know if they did
 3 a threat assessment until afterwards.
 4 **Q. Okay. So you simply weren't available**
 5 **then?**
 6 A. Right. I asked to have one done. I told
 7 them I wanted one.
 8 **Q. Before?**
 9 A. Before that morning, but I wasn't . . .
 10 **Q. And who did you ask?**
 11 A. Mr. Meredith.
 12 **Q. And did he say, Yes, we're going to do**
 13 **one, or what did he say?**
 14 A. I don't think he committed. He hadn't
 15 even met with (THE STUDENT) yet. It was just based on
 16 my -- oh, sorry.
 17 **Q. That's all right. We'll take it out.**
 18 A. I'm so sorry.
 19 **Q. No, don't worry. We'll take it out.**
 20 A. He hadn't met with the student yet, so he
 21 was waiting to meet with that student on Monday
 22 morning.
 23 **Q. Okay. And then something happened that**
 24 **you don't know about that triggered the threat**
 25 **assessment?**

92

1 A. Right.
 2 **Q. Do you know who actually conducted the**
 3 **threat assessment?**
 4 A. I don't.
 5 **Q. And did you ever see the threat**
 6 **assessment?**
 7 A. No.
 8 **Q. Did you ask to see the threat assessment?**
 9 A. No, I didn't. Mr. Bast is the one who
 10 told me the results.
 11 **Q. You know when -- back when Mrs. Pierson**
 12 **picked up Karl, and as I understand didn't acknowledge**
 13 **you --**
 14 A. Yes.
 15 **Q. -- I assume you were somewhat affronted**
 16 **by that?**
 17 A. I called my husband on the way home, and
 18 I said, I just can't believe that a parent would do
 19 that.
 20 **Q. Did you discuss that with anyone other**
 21 **than your husband?**
 22 A. Oh, yeah, I told the cross-country
 23 coaches.
 24 **Q. Okay. And what did they say about that?**
 25 A. Well, we had kind of a little deal where

93

1 we would say if the kids weren't picked up, we would
 2 say, You owe a Starbucks, because to get the kids
 3 picked up they said, Well, I'm going to have to buy a
 4 Starbucks for all of my coaches, they would get picked
 5 up. And so it was just always a joke, We never got
 6 that Starbucks.
 7 **Q. Did anyone -- well, did you think about**
 8 **calling Mrs. Pierson because of that?**
 9 A. No. It was a summer running club. It's
 10 not part of the school. I mean, it's a club. It was
 11 just rude.
 12 **Q. And after that, you had no contact with**
 13 **her at all?**
 14 A. No.
 15 **Q. Okay. All right. When Karl's grades**
 16 **were -- you talked about that he bombed the test?**
 17 A. Right.
 18 **Q. And then bombed it again the next day**
 19 **with two 49's or something?**
 20 A. Right.
 21 **Q. Was that the last test --**
 22 A. Yes.
 23 **Q. -- before the final?**
 24 A. That was December -- well, we took the
 25 first one around, I think, the 1st of December, and

94

1 then I gave it back on like the -- I always get them
 2 done within a couple of days. But he retook it on
 3 Thursday the -- counting back, because I gave it to
 4 him the 9th. I gave it back to him on the 9th. When
 5 he said C'est la vie, it was the 9th. So he took it
 6 on that Thursday on his off hours before that, which
 7 would have been December 5.
 8 **Q. So he took the original test on the 5th**
 9 **of December?**
 10 A. No, he took -- I have a Monday,
 11 Wednesday, Friday. He took it on Wednesday. Now, my
 12 dates are -- I think they're right, but I don't have
 13 access to his records. But I think it was December 4
 14 he took the test, bombed it, this is the second one he
 15 bombed. Came in the next day and wanted to retake it.
 16 I said, Why don't you wait to retake it? And then he
 17 said, No. And he took it, and that's when he bombed
 18 those. A test in November that he failed, when I
 19 called his mom, he came in and retook it and rocked
 20 it. And I pounded his fist and said, Great job, Karl,
 21 you did really well on it.
 22 **Q. What did he say? How did he act?**
 23 A. Yeah, I guess -- I mean, I think he was
 24 -- he pounded me back.
 25 **Q. Okay. So percentage-wise after this test**

95

1 **that was bombed in December, how much of the grade was**
 2 **left to go?**
 3 A. Just the -- I gave 25 points for the
 4 review, and so that's an -- that's like a bonus thing
 5 because it's kind of a thick review packet that they
 6 have to recount the whole semester of grammar and then
 7 the final.
 8 **Q. How much is the final worth?**
 9 A. 10 percent.
 10 **Q. So he had 35 percent of his grade to go**
 11 **at that point?**
 12 A. No, no, no. It was 25 points, not 25
 13 percent. The final review is 25 points.
 14 **Q. Well, what's that percentage work out to?**
 15 A. Well, my grades are weighted, so I do 45
 16 percent for tests and quizzes, 30 percent for academic
 17 knowledge like writing and speaking and projects, and
 18 then 15 percent for homework, computer work, and
 19 respect and behavior, and 10 percent for the final. I
 20 think that's 100. I've done this a million times, you
 21 think I would be --
 22 **Q. It's okay.**
 23 A. So, sorry. The 25 points was going into
 24 the academic knowledge part, and then the final is 10
 25 percent. So that 25 points out of that 30 percent

96

1 thing is not that much.
 2 **Q. All right. You said earlier that when**
 3 **Kolasa came back the second time on December 11 --**
 4 A. Yes.
 5 **Q. -- that he had told you that he had**
 6 **decided not to suspend Karl?**
 7 A. Yes.
 8 **Q. But he didn't express his reasoning?**
 9 A. No.
 10 **Q. And you didn't ask?**
 11 A. And I didn't ask.
 12 **Q. But -- well, why didn't you ask?**
 13 A. Well, as a teacher, I don't -- that's an
 14 administrator's job. It's not my -- it's not a
 15 teacher's job to give a suspension.
 16 **Q. Well, do you accept that approach then?**
 17 A. Pardon me?
 18 **Q. Do you accept that approach, or do you**
 19 **disagree with it?**
 20 A. No, I think it's an administrator's job.
 21 **Q. So I'll put it another way. You didn't**
 22 **expect to be asked or did you want to be asked to have**
 23 **some input into what would be appropriate?**
 24 A. I didn't expect to be asked.
 25 **Q. Did you want to be able to do that?**

97

1 A. No.

2 **Q. Why is that?**

3 A. I think that's their job and because we

4 don't -- I didn't have any prior knowledge to anything

5 about Karl's behavior.

6 **Q. Well, except for the tequila thing?**

7 A. No, but I mean like his other incidences

8 with Mr. Murphy. I found out on -- when I asked him

9 to leave my class on the 11th, on that sixth hour,

10 kids were hearing that he had been asked to leave

11 class, you know, it's kind of the kids all talk. Oh,

12 the administrator -- she's out with the administrator.

13 You know, the kids talk. And a bunch of kids said,

14 Oh, he gets kicked out of a lot of classes. That was

15 the first time I even knew that. So it wouldn't be my

16 job to say, Suspend him, not knowing any of his other

17 behavior issues. I feel like that is something that

18 an administrator would have the knowledge about and

19 make that decision based on prior knowledge.

20 **Q. Okay. I understand that, I guess. But**

21 **let's come at it a little bit differently. But you do**

22 **recall making a statement that you thought that what**

23 **happened on December 11 in your classroom didn't**

24 **justify a formal suspension; is that correct?**

25 A. What I said was he said, I didn't suspend

99

1 smell it, but I can't do anything about it. And I

2 said to him, My issue is he's in a class with

3 sophomores, and what kind of example does that set to

4 sophomores that they see a kid come in stoned out of

5 his mind and come right back to class the next class

6 period? I actually said that. And he said, My hands

7 are tied, I have to follow policy, and I cannot

8 suspend a kid that does not have the illegal substance

9 on his person.

10 **Q. Okay. But back to the original point**

11 **about whether a particular action or offense or**

12 **whatever justifies a suspension or doesn't justify a**

13 **suspension, I take it that -- well, let me ask it this**

14 **way. Do you have personal feelings about what type of**

15 **incidents would rise to the level of a suspension,**

16 **formal suspension?**

17 MS. GOMEZ: Object to form.

18 A. My personal opinion is that if a student

19 is threatening another student or teacher, he should

20 be suspended, yes.

21 **Q. (BY MR. EVERALL) But on this particular**

22 **day -- so does that mean that what Karl was doing**

23 **didn't warrant a suspension in your mind?**

24 MR. ROCHE: Are you talking about on the

25 11th?

98

1 him. I said, Well, I don't know if it's suspendable,

2 but I think I want an apology. That's what I said.

3 **Q. So why didn't you think it was**

4 **suspendable?**

5 A. Because I guess I don't know what is

6 suspendable. I really don't.

7 **Q. Okay.**

8 A. Let me give you an example, Mr. Everall.

9 That same spring -- let me back up. This is actually

10 -- this was before the shooting. Oh, I can't

11 remember. The same class, fifth hour, I had a kid in

12 there, another senior. I only had three seniors in

13 that class. He came to class reeking of weed, just

14 the whole room smelled and my kids were like,

15 Mrs. Lombardi, we can't breathe. It was a big deal.

16 I went and called 6,000, and the administrators came

17 and got him out of my class. Well, I followed up with

18 Mr. Kolasa. I went down and I said, Kevin is (THE

19 STUDENT) going to be suspended? Sorry.

20 **Q. It's okay. Another name to redact.**

21 A. This is hard. Is he going to be

22 suspended? And he said, No, I can't suspend him

23 because we checked his locker and his car and his

24 backpack and there's no weed on him. And you're

25 right, he is high, he is as high as a kite. I can

100

1 MR. EVERALL: Yes.

2 A. I don't know. I really don't know.

3 **Q. (BY MR. EVERALL) All right.**

4 A. If I looked back, based on what I know

5 now, it probably was suspendable. With what I knew

6 then on that day with my situation, I don't know.

7 **Q. Well, it sounds like you were willing to**

8 **forgive him?**

9 A. I was. I give my kids -- teenagers are

10 teenagers. You know, they make mistakes. I forgive

11 them. I hug my kids. I tell them I love them all the

12 time. I never in a million years thought that it

13 would turn out the way it did.

14 **Q. Thanks. I appreciate your input.**

15 A. Thank you.

16 MR. ROCHE: Is that it?

17 MR. EVERALL: That's it.

18 MS. GOMEZ: I just have a few.

19 EXAMINATION

20 BY MS. GOMEZ:

21 **Q. Just to clarify, I'm going to go off some**

22 **of your questions. And I just want to clarify this**

23 **last part with the -- what you feel is suspendable or**

24 **not, and just to make sure I'm hearing your answer,**

25 **the isolated incident on the 11th that you knew of at**

101

1 **that time, is it your opinion that at that time just**
 2 **based off of your limited knowledge, that that was not**
 3 **suspendable or probably wasn't suspendable?**
 4 A. Probably not.
 5 **Q. But had you known everything else, your**
 6 **opinion might have changed?**
 7 A. Yes.
 8 **Q. But we're talking hypothetically, right?**
 9 A. Right. I can't speculate, but I would
 10 think the combination of things would warrant that,
 11 yes.
 12 **Q. But at that time when he yelled at you --**
 13 A. I don't think so, no.
 14 **Q. -- no one -- at that time you weren't**
 15 **told about the previous threat to Mr. Murphy?**
 16 A. No, I knew nothing about that.
 17 **Q. You weren't told about the threat**
 18 **assessment?**
 19 A. No, I didn't know any of that until after
 20 the shooting.
 21 **Q. Okay. And that includes his other**
 22 **behavioral issues in the other classes?**
 23 A. Right. I knew nothing before the
 24 shooting.
 25 **Q. You were talking about earlier the need**

102

1 **to know/need to ask policy?**
 2 A. Yes.
 3 **Q. Do you know what the standard is for the**
 4 **need to know/need to ask policy?**
 5 A. No, I don't.
 6 **Q. Was it explained to the best of your**
 7 **memory?**
 8 A. Well, it was a long training. It was --
 9 I think it was basically that if -- we were kind of
 10 redefining FERPA a little bit, and that if you felt it
 11 was important for someone to know something about
 12 another student in order to keep them safe from
 13 themselves or others, we could discuss it with each
 14 other.
 15 **Q. So that would be a subjective assessment**
 16 **on an individual teacher's perspective?**
 17 A. I think so.
 18 **Q. And you weren't given any kind of**
 19 **parameters to your memory?**
 20 A. I can't remember.
 21 **Q. That's fine.**
 22 A. I have the -- I think I have the handouts
 23 at school.
 24 **Q. That's fine. It's not a quiz. Okay.**
 25 **And the last few ones, the threat assessment of the**

103

1 **student, the second student, were you asked to**
 2 **participate?**
 3 A. No.
 4 **Q. Okay. Were you told of the result of the**
 5 **threat assessment, like whether it's low, high,**
 6 **medium?**
 7 A. No.
 8 **Q. And you said you were told that there**
 9 **were triggers, correct?**
 10 A. Yes.
 11 **Q. Were you told what those triggers were?**
 12 A. That he was angry at me and his dad.
 13 **Q. What would trigger his temper though?**
 14 **Were you told anything like that?**
 15 A. No.
 16 **Q. Would that have been something helpful to**
 17 **you?**
 18 A. Yes.
 19 **Q. Why?**
 20 A. Well, actually he was getting taken out
 21 of my class anyways, so I guess maybe it wasn't
 22 helpful. But it would have been helpful for maybe his
 23 other teachers.
 24 **Q. Now, you said you talked to the other**
 25 **teacher who was receiving him as a student?**

104

1 A. Yes.
 2 **Q. Was he told of the threat assessment?**
 3 A. No.
 4 **Q. How do you know that?**
 5 A. Because I asked him.
 6 **Q. Did you tell him anything about what you**
 7 **knew of the threat assessment?**
 8 A. I told him what Mr. Bast told me.
 9 **Q. You weren't able to tell him what the**
 10 **triggers were?**
 11 A. No, because I didn't know what they were.
 12 Well, just that he was angry. I don't know anything
 13 else, just that he was angry at me and his dad.
 14 **Q. Okay. Because you didn't know the level**
 15 **of the threat assessment, you couldn't tell him that**
 16 **either?**
 17 A. Right.
 18 **Q. You also talked about better**
 19 **communication. You're a department head?**
 20 A. I am now. I wasn't at the time.
 21 **Q. Would it be helpful for you to know or at**
 22 **least convey to your department if you had knowledge**
 23 **of what students were suspended?**
 24 A. Absolutely.
 25 **Q. Or having behavior?**

105

1 A. Absolutely.

2 **Q. Would you be able to get that information**

3 **to your colleagues quicker than having them go track**

4 **down an administrator?**

5 A. Yes.

6 **Q. And that's only if -- currently are you**

7 **told as a department head any behavior issues --**

8 A. No.

9 **Q. -- for any students?**

10 A. No. Well, I've only been department

11 chair since April 1.

12 **Q. Since April 1?**

13 A. So, no, I have not.

14 **Q. And being part of the Spanish language --**

15 **or the language -- world language department, were you**

16 **ever told by your department chair previously about**

17 **any behavior issues that they were aware of in the**

18 **administration?**

19 A. I don't think so.

20 MS. GOMEZ: That's all I have.

21 MR. ROCHE: I don't have any other

22 questions. Thank you so much for coming in.

23 (Discussion off the record.)

24 MR. ROCHE: We are back on the record in

25 the deposition of Ms. Vicki Lombardi. There were a

106

1 couple of instances where inadvertently students'

2 first names were mentioned. We are mindful of the

3 requirements of FERPA in this arbitration, and I

4 believe we've got a stipulation among the parties that

5 in any instances where a student's name is

6 inadvertently mentioned during the course of the

7 deposition, it will be stricken from the record and

8 replaced with (THE STUDENT). That obviously does not

9 apply to mentions of Karl Pierson in these depositions

10 or Claire Davis.

11 MR. EVERALL: That's accurate.

12 WHEREUPON, the within proceedings were

13 concluded at the approximate hour of 4:25 p.m. on the

14 2nd day of July, 2015.

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107

I, VICTORIA D. LOMBARDI, 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

VICTORIA D. LOMBARDI

The signature above of

VICTORIA D. LOMBARDI was subscribed and sworn to

before me in the county of _____, state of

_____, this _____ day of

_____, 2015.

Notary public

My Commission expires:

Michael Davis, et al. 7/2/15 (am)

108

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

VICTORIA D. LOMBARDI 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 15th day of July, 2015.

My commission expires September 24, 2016.

Reading and signing was requested.

Reading and signing was waived.

Reading and signing was not required.

REPORTER'S CERTIFICATE

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

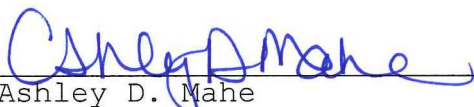
I, ASHLEY D. MAHE, Registered Professional Reporter and Notary Public, ID 20084033353, State of Colorado, do hereby certify that previous to the commencement of the examination, the said VICTORIA D. LOMBARDI was duly sworn by me to testify to the truth in relation to the matters in controversy between 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 15th day of July, 2015.

My commission expires September 24, 2016.

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



Ashley D. Mahe
Registered Professional Reporter

<p style="text-align: center;">A</p> <p>ability 75:7</p> <p>able 23:7 35:18 72:9,12 76:11 96:25 104:9 105:2</p> <p>absences 11:3 14:17</p> <p>absolutely 15:12 23:9 31:10 48:5 55:4 57:9,16 59:1 60:1 85:3 104:24 105:1</p> <p>abundantly 4:24</p> <p>academic 13:19 95:16,24</p> <p>accept 96:16,18</p> <p>access 23:7 24:5,8 24:12 41:4 63:24 94:13</p> <p>accurate 63:21 106:11 107:3</p> <p>ACISS 3:15</p> <p>acknowledge 72:18 73:1 92:12</p> <p>ACSO 42:21,25</p> <p>act 52:23 94:22</p> <p>acted 52:21 53:11 57:8 76:2</p> <p>action 43:18 99:11</p> <p>actions 49:21</p> <p>add 22:23</p> <p>address 39:3</p> <p>addressing 62:9</p> <p>administration 14:25 15:8 19:17 20:24 21:22,23 39:7,10 42:5 71:15 78:16 80:15 83:17 105:18</p> <p>administration's 15:9</p> <p>administrator 10:6 10:14 11:2,24 13:25 14:23 18:4 18:24,25 19:8 29:2 48:3,6 50:16 60:25 97:12,12,18</p>	<p>105:4</p> <p>administrator's 96:14,20</p> <p>administrators 10:16 23:8 68:2 69:4 71:8 72:17 72:25 98:16</p> <p>adopted 84:5</p> <p>advised 48:4 50:9 50:14</p> <p>affect 6:18</p> <p>affixed 108:15</p> <p>affronted 92:15</p> <p>aforsaid 108:8</p> <p>afraid 49:14 64:18</p> <p>afternoon 4:10 38:3 75:21 79:20</p> <p>agenda 79:10</p> <p>agent 65:25 66:5 70:2</p> <p>agents 68:15</p> <p>ago 22:4 34:5</p> <p>ahead 20:2 26:17 26:18 62:15 72:21 80:12</p> <p>ahold 76:25</p> <p>AHS 20:24</p> <p>al 107:25</p> <p>all-staff 67:25</p> <p>allowed 64:23</p> <p>alphabetically 10:13</p> <p>amendments 107:5 107:6</p> <p>America 16:2</p> <p>Ames 67:23</p> <p>anger 55:23</p> <p>angle 9:22</p> <p>angry 50:4 76:13 80:8 103:12 104:12,13</p> <p>answer 7:7 72:22 100:24</p> <p>anybody 7:2 39:7 42:4 66:21 73:9 90:6</p> <p>anymore 41:5 86:21</p>	<p>anytime 63:14</p> <p>anyway 80:1</p> <p>anyways 103:21</p> <p>apologize 51:12 54:1,5 55:15 81:25</p> <p>apologized 77:1 81:22</p> <p>apology 54:7 98:2</p> <p>appears 43:8 62:18</p> <p>apply 106:9</p> <p>appreciate 4:15,18 7:22 16:16 50:22 55:20 59:11 100:14</p> <p>approach 96:16,18</p> <p>appropriate 96:23</p> <p>approximate 106:13</p> <p>April 105:11,12</p> <p>Arapahoe 5:5 8:23 9:2,14 13:9 15:24 20:14,20 21:18,21 21:22 24:2,8 34:17 35:12 55:9 61:15 62:3 63:23 66:1 68:11,18 71:15,22 72:17,25 73:9 89:15</p> <p>arbitration 1:4 4:13 5:15 6:8,13 29:18 34:11 75:8 106:3</p> <p>areas 34:9</p> <p>arm 71:1</p> <p>arrogant 29:14</p> <p>Ashley 1:13 6:23 12:6 108:4</p> <p>ask/need 35:20,25</p> <p>asked 26:4 31:12 37:1 45:21 77:21 78:24 84:10 90:7 91:6 96:22,22,24 97:8,10 103:1 104:5 108:9</p> <p>asking 6:3 16:25 17:2,5 33:2 58:15 67:9 74:10</p>	<p>assessment 15:14 15:18 55:2 77:22 79:19 80:7 82:5 83:4,11,14,21,23 83:25 84:9,10 85:12,13 90:17 91:1,3,25 92:3,6,8 101:18 102:15,25 103:5 104:2,7,15</p> <p>assessments 84:7 84:17</p> <p>assigned 13:19,25</p> <p>assignment 41:6</p> <p>assignments 31:15</p> <p>assistant 10:16,20</p> <p>Association 2:12</p> <p>assume 92:15</p> <p>ate 40:6</p> <p>attached 3:9 107:4 107:6</p> <p>attack 47:8</p> <p>attendance 13:12 13:20</p> <p>attended 30:19</p> <p>attention 15:7,9 20:10 42:13,24 44:1 71:3 84:22</p> <p>August 28:5</p> <p>aunt 22:22,24</p> <p>auxiliary 30:14</p> <p>available 88:8 91:4</p> <p>aware 15:4 73:25 77:6 105:17</p> <p>awful 82:24</p>	<p>98:9 99:5,10 100:4 105:24</p> <p>backpack 98:24</p> <p>backpacks 89:13</p> <p>bad 75:17</p> <p>bad-mouth 61:1,9</p> <p>balling 77:25</p> <p>bang 63:17</p> <p>banging 46:20,22 47:14 48:13,18</p> <p>barely 89:18</p> <p>based 73:4,7 77:7 90:23 91:15 97:19 100:4 101:2</p> <p>basically 102:9</p> <p>basis 29:6</p> <p>Bast 92:9 104:8</p> <p>bathroom 46:9 78:21</p> <p>Bear 25:16</p> <p>beginning 24:25 25:14 28:12</p> <p>behalf 1:12</p> <p>behavior 3:12 11:2 13:20 23:13 24:1 38:1 56:7,8,10,14 95:19 97:5,17 104:25 105:7,17</p> <p>behavioral 13:12 24:9 28:1 31:24 34:19 42:8 101:22</p> <p>behaviors 23:19 76:6 77:19</p> <p>belief 82:16</p> <p>believe 47:6 92:18 106:4</p> <p>bell 45:25 46:18 55:25 79:10</p> <p>belongings 64:24</p> <p>best 34:12,13 49:4 85:15 102:6</p> <p>better 18:20 39:17 40:8 82:18 84:23 84:25 85:23 104:18</p> <p>big 39:25 49:19 85:21 98:15</p> <p>bigger 28:15</p>
<p style="text-align: center;">B</p>				
<p>back 6:17 11:23 12:24 27:5 29:6 34:4 36:24 38:16 38:19,22,25 40:23 45:1 48:9,10 51:25 53:8,13,16 53:18 54:11 64:23 65:7 70:17 74:19 75:23 76:10,22 77:20 82:23 83:3 89:19 92:11 94:1 94:3,4,24 96:3</p>				

bit 22:1 32:25 41:8 72:10 73:13 97:21 102:10	50:16 53:17 67:3 79:1	challenge 19:6	79:25 82:2,3,6,6,7	coming 4:15,18 22:20 55:21 78:2 105:22
blames 76:4 86:5	C'est 41:23 94:5	chance 4:23	82:12 85:16 97:9	commencement 108:5
blaming 5:19	cafeteria 48:5	change 16:17 35:11 44:16 72:6	97:11 98:11,13,13	comment 53:1
blowing 41:16	50:11 53:19 70:4	changed 16:12 17:25 22:15 63:23	98:17 99:2,5,5	commission 107:21 108:18
blurting 36:1	70:9	72:9 101:6	103:21	committed 91:14
board 45:1 66:6	call 6:7 14:17,22	changes 74:12 75:5 81:9 84:20	classes 77:15,18 97:14 101:22	common 33:15,24 34:16,18 73:21
68:24 69:8 70:3	26:6 40:20,23	characterize 20:23 36:6 49:5	classroom 28:8 29:24 47:18 49:12	communication 19:24 75:11 82:17 84:23,25 104:19
79:10	47:16 51:24 58:14	characters 22:25	51:24 53:17 62:19	compartmentaliz... 34:25
body 87:14	75:19 76:16,19,22 77:2	chatted 27:5 89:10	63:6,10 67:3	complains 20:23
bombed 39:25	called 6:9 22:18	check 13:25 14:3 59:24	70:15 78:25 79:13	complaint 21:21
93:16,18 94:14,15	24:1 26:4 40:10	checked 79:4 98:23	82:23 85:15 89:8	compose 8:11
94:17 95:1	40:18,19,22 48:2	cheered 27:15	97:23	computer 95:18
bonus 95:4	50:7,14,15 51:20	chitchatted 27:8	classrooms 29:19 70:25	concern 13:19,20 21:18 40:17 73:23
Booth 68:25	53:23 56:6 58:12	Christina 78:13,22	cleaner 7:8	concerned 42:1 53:24 76:18 77:3 77:5
bother 57:17	59:22,23 75:25	chronologically 30:9 43:23	clear 4:25 5:12 16:21 17:4,4 25:20 59:16 60:16 78:7	concerning 23:14 42:9 56:7,15
bottle 46:2	76:16 79:20 82:8	church 59:25 89:20	clearly 4:25 7:15	concerns 21:5,7 61:12 80:14
bottom 12:19 20:11 20:22 26:14 42:20	92:17 94:19 98:16	CITY 108:3	close 30:9	concluded 106:13
bounceback 39:2	calling 82:23 93:8	Civil 4:2	closed 52:18	conducted 15:19 92:2
bouncing 22:1	calmed 53:22	Claimants 1:6,12 2:2	clothes 44:16	conference 30:25 31:9 32:16 79:23
boy 82:6	Cameron 48:4	Claire 106:10	club 25:14 93:9,10	conferences 30:10 30:20 32:9,12
boys 25:7,8	50:10,20 53:19	clarification 11:6 59:11	coach 25:4 26:7 44:11 86:21	confines 72:11 85:6
break 8:6,11 24:18 48:12 74:6,10,14 74:17	76:13	clarify 9:18 17:4 45:13 100:21,22	coach's 44:23	confusing 7:25
breakfast 68:1	Campus 22:8,12,14 23:24 72:8	clarifying 88:1	coached 25:6	connection 4:12 72:19
breath 8:12	23:24 72:8	class 9:23 10:14,23 14:18 22:20 23:17 23:18 24:20,23 28:13 29:6,7,8 30:6 31:12 32:18 36:2,3 37:8,21 38:1,5,10,13 41:17 45:24,25 46:11,22 47:9,25 48:9,10 49:20 51:13 52:18,20 55:22 56:16 60:18 63:15 75:12,19 77:22 78:10,11,23 78:24 79:9,15,17	coaches 25:25 92:23 93:4	contact 22:13,18,21 23:5,15,25 24:11 72:7,7 75:23 93:12
breathe 98:15	candidate 13:21		code 23:4	contacts 22:22,25
brief 23:1	car 26:13 50:5 98:23		colleagues 105:3	control 55:23
bring 16:7	carbon 11:13		Colorado 1:13,14 2:5,9,12,13 3:15 4:2 65:19 108:2,5	controversy 108:6
broad 14:10 36:5 51:5	care 78:10		coloring 75:18	conversation 52:8
broadly 34:15	career 49:23		combination 101:10	
broken 10:16	cares 5:1		come 5:4 7:15 9:22 11:23 25:22 27:1 46:9 50:3 53:8 54:4 58:15 75:8 78:16 88:11 97:21 99:4,5	
brought 15:8 46:10	Carol 2:17		comes 5:3 15:7	
building 49:24	carpooling 27:3		comfortable 33:8	
bullying 29:20	case 6:14 28:19 74:9			
bunch 40:19 69:6,8 69:10 76:7 97:13	cases 14:7			
Bureau 3:15 65:19	catch 8:12			
busy 19:4	CBI 68:11,14 89:2			
buy 93:3	celebrations 37:17			
	certain 57:15			
	certainly 9:22			
	CERTIFICATE 108:1			
	certify 107:2 108:5 108:10			
	chair 105:11,16			
C				
C 2:1 39:14 40:12 46:2 48:3,7,25				

<p>55:14 58:21 59:18 59:20 conversations 7:6 41:1 59:6 60:9,10 convey 104:22 Cooper 35:17 36:16 copies 12:2,16 13:4 copy 11:13,21 12:20,25 39:5,7 corner 42:21 46:3 correct 15:5 17:22 36:5 66:1 82:15 97:24 103:9 correctly 43:1 89:25 corroborate 6:17 counsel 61:23 108:11 counselor 10:6,12 10:20 11:4,24 13:1,19 68:22 80:4 83:6 counselors 69:10 83:18 counting 94:3 county 20:14 68:11 89:15 107:15 108:3 couple 6:6 46:19 48:10 86:15 87:12 88:13 90:16 94:2 106:1 course 27:18 65:1 70:18 80:25 106:6 covered 16:24 coworker 82:3 coworker's 82:3 coworkers 35:1 creatures 85:23 crisis 75:7 84:23 Crookham 20:15 20:18,23 Crookham's 21:5 35:5 cross-country 25:4 25:5 27:16 86:17 92:22</p>	<p>crying 58:16 cultural 37:14 culture 34:16 currently 105:6 cuss 53:25</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>D 1:2,12,13 2:11 3:1,2 4:5 8:20 40:21 107:1,9,14 108:4,6 D.C 76:9 dad 80:8 103:12 104:13 daily 42:13 Darrell 76:19 77:1 database 22:8 date 3:16 40:19 43:18 dates 19:14 94:12 daughter 5:4 87:6 Davis 1:5 2:16,16 4:12 106:10 107:25 day 25:19 29:15 30:5 37:12,13,17 38:5 40:24 47:12 51:8,9,16 57:5 60:7,8 65:4 66:3 66:21 67:4,13 68:7 71:8 73:20 74:25 75:17 80:2 80:4,18 81:15 82:1 89:16 93:18 94:15 99:22 100:6 106:14 107:16 108:16 days 65:2,9 68:16 69:15 86:22 94:2 de 37:13 dead 37:13,17 deal 92:25 98:15 dealings 24:16 27:11 debate 44:11,16 debriefing 71:23 December 16:18 28:16 36:11 42:10</p>	<p>45:4,16,24 56:16 60:12 62:20 66:1 68:19 69:19 77:8 88:6 90:11 93:24 93:25 94:7,9,13 95:1 96:3 97:23 decide 49:22 decided 91:1 96:6 deciding 15:10 decision 97:19 decisions 34:13 definitely 43:20 demeanor 49:21 denies 57:18 Denver 1:12 2:5,9 2:13 108:3 department 35:2,3 55:10 84:19 104:19,22 105:7 105:10,15,16 departure 62:3 DEPONENT 13:15 13:22 14:4 38:22 80:22 87:2,5,8,11 deposition 1:2,11 3:7,17 6:23 7:20 12:6 20:4 42:15 45:12 56:4 62:16 65:13 105:25 106:7 107:3 108:7 depositions 74:9 106:9 Deputy 78:25 describe 63:9 described 17:8,9 38:15 45:5 describes 37:7 describing 11:7 20:15 description 65:25 Desiree 1:5 2:16 86:6 desk 37:25 55:17 detail 3:12 24:1,9 56:7,8,11,14 88:1 detective 60:2 detectives 57:14 58:12,24 59:2</p>	<p>62:24 66:24 70:16 determined 70:2 devotion 75:2 dia 37:13 dial 49:24 diary 58:13 different 9:5 18:2 35:8 differently 97:21 direct 14:24 20:10 42:24 43:25 dirt 26:14 disagree 96:19 disagreement 58:7 disappointed 60:19 disciplinary 9:16 9:19 15:7 23:3 42:9 discipline 14:1,4,7 20:25 discrepancy 57:4 discuss 34:17 61:11 66:20 71:24 72:12 81:24 92:20 102:13 discussed 30:25 44:14 59:1 84:15 discussion 54:12 58:23 59:3 105:23 discussions 44:3 58:2 71:14 72:3 73:8 disrespectful 28:23 28:24 30:4 37:21 37:22 51:7 75:13 disrupted 63:19 disruptions 29:25 30:3 disruptive 29:20 distance 87:1 district 1:8 35:17 document 3:14 20:14 65:15,18 88:22 documents 28:19 37:7 56:22 doing 4:13 32:17 36:3,12 45:1 76:8</p>	<p>76:24 86:13 99:22 door 46:17,20 47:7 47:14 48:11,13,18 48:20 50:1 52:18 53:17 60:1,3,5 63:18 79:23 80:5 doors 46:6,7 73:16 73:19,24 78:18 dragged 90:3 dress 44:14 drink 30:5 drinking 28:13 37:19 46:2 drive 50:6 drop 39:20 40:21 dropped 39:14,25 40:13 41:2 drove 26:20 drugs 47:18,18,18 76:8 duly 4:6 108:6</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>E 2:1,1 3:1 43:3 e-mail 3:8,9,11 16:6 18:15 23:16 37:3,10 38:14 39:5,7,23 45:17 77:13,16,20 90:7 90:9 e-mailed 38:3 75:20 e-mails 4:23,25 38:24 77:15 earlier 55:2 96:2 101:25 ease 43:23 easier 12:7 east 76:10 easy 4:16,17 edits 81:10 Education 2:12 effort 19:7 either 6:17 7:24 10:20 11:24 21:22 29:20,21 57:18 58:11 68:17 104:16</p>
---	--	--	---	--

<p>Elementary 67:23 eligible 44:25 emergency 14:22 49:24 emotional 11:3 13:12 employed 108:10 encompass 85:2 encounter 27:10 end-of-the-year 62:5 ends 7:10 endurance 8:6 enforcement 66:8 66:21 69:6,18 70:3,7 71:12,17 Englert 78:25 enhance 84:21 enjoyed 87:20 entered 6:8 73:15 entitled 3:14 entry 56:15 environment 12:9 especially 8:9 ESQ 2:3,7,12 et 107:25 Euclid 62:13 evening 67:11,11 Everall 2:7,8 3:4 7:2 14:3 30:2 38:21 45:18 61:25 72:20 73:3 74:3 86:2,10,12 87:15 88:20,24 98:8 99:21 100:1,3,17 106:11 everybody 30:13 30:16 33:5 34:10 34:11 evident 66:6 75:3 exactly 32:2 36:8 43:4 60:14 80:3 examination 3:2 4:8 86:11 100:19 108:5 example 14:12 98:8 99:3 exchange 38:8</p>	<p>exhibit 3:8,10,11 3:12,14,15,18 20:3,4,6,8,9,13 36:25 37:3 42:15 42:16 45:5,6,12 45:14 56:4,6 62:16,17 65:13,14 65:24 88:3,19 90:5 exhibiting 76:5 EXHIBITS 3:7,17 expect 96:22,24 expelled 15:22 experience 34:16 expires 107:21 108:18 explain 7:17 13:17 explained 53:10 77:16 82:21 102:6 express 96:8 expressed 73:23 extent 70:11 eyes 49:19</p> <hr/> <p style="text-align: center;">F</p> <p>F 39:25 40:13,21 41:14 F-you 37:24 face 18:5,6 64:9 facing 34:19 fact 42:1 58:13 66:20 81:3 facts 15:4 faculty 21:18,20 23:8 24:7,8,12 55:9 69:2 71:16 71:22 84:22 failed 41:16,17 42:2,6 94:18 failing 23:18 44:23 77:14,18 fairly 32:4 39:22 Falcon 25:17 fall 24:21,25 27:11 27:19 28:4 30:18 30:25 36:24 familiar 24:2,4 familiarity 9:15</p>	<p>family 4:12 far 7:14 30:1,4 Farrington 2:8 fast 6:24 12:10,13 father 30:19 fault 5:22 favorite 86:25 FBI 68:11,15 89:2 February 35:16 36:17 58:11 feel 16:16 17:4,5 33:2 36:9 85:10 97:17 100:23 feelings 99:14 fellow 33:14 felt 33:19 49:19 61:1 82:9 102:10 FERPA 32:20 33:5 72:10,11 85:6,7 102:10 106:3 fifth 48:22 78:2,10 79:8 81:14 91:2 98:11 file 12:25 fill 10:2 11:9 14:12 14:14 46:1 filling 15:1 final 46:4,5 93:23 95:7,8,13,19,24 finalized 81:9 finally 8:4 76:25 find 5:23 18:23,24 19:2 50:19 53:8 74:23 fine 13:23 74:15 81:13 102:21,24 finish 7:7,9 27:1 74:23 fired 76:14 firing 76:13 first 4:6,14 9:8 10:4 26:2 28:9 44:10 45:17 51:19,22 52:13 63:7 70:19 78:12,15 89:16 93:25 97:15 106:2 fist 94:20 five 30:17 63:19</p>	<p>74:14 fix 81:3,4 focus 29:6 folks 69:6,8 follow 99:7 followed 90:11 98:17 following 4:1 43:6 follows 4:7 33:5 foregoing 107:2 108:8 forgive 55:21 100:8 100:10 forgot 46:12,16 81:22 form 10:2 11:7,12 11:13 13:4,8,11 14:2,6,6,13,14 15:1 19:10,12 23:2 72:20 84:13 99:17 108:8 formal 97:24 99:16 forms 22:3,7 forth 6:17 found 48:4 50:11 50:20 53:19 79:6 89:25 97:8 foundation 62:1 fountain 46:3 four 13:4 50:18 52:10 86:22 89:9 fourth 79:5 frankly 5:4 74:8 frazzled 90:3 free 16:17 17:4,5 36:9 French 41:23 frequent 29:23 30:1 freshman 25:10 65:6 Friday 51:13 65:5 65:7 67:16 76:21 89:12 94:11 friends 85:16 front 16:8 41:20 43:17 46:18 47:1 53:4,23 61:1,10</p>	<p>64:9 80:5 full 8:18 funny 53:1 further 15:10 108:10</p> <hr/> <p style="text-align: center;">G</p> <p>Gage 2:3 gather 64:23 gathering 70:8 general 6:21 12:10 generally 6:7 9:21 28:5 Georgetown 87:3 getting 12:11 32:1 55:17 75:22 103:20 girl 27:4 girl's 22:22 girls 25:6,7 82:24 give 7:18 16:8 43:12 45:6 74:11 80:13 83:21 90:5 96:15 98:8 100:9 given 8:9 19:6 84:22 102:18 108:9 giving 63:23 glad 87:15,18 glass 46:21 go 7:6 10:20,25 11:2,3 12:21 18:4 18:5,9,23 19:4,7 20:2 23:12,16 25:15,16,17 32:16 36:24 43:24 44:10 44:23 46:9 50:19 51:21 53:7 54:2 62:15 72:21 73:12 79:22 80:12 95:2 95:10 100:21 105:3 goes 7:19 10:5,12 52:1 77:4 82:5 going 5:12 6:2,3 7:7,21,23 8:4,10 10:5 12:5 16:13 20:7,10 24:6,17</p>
---	---	---	---	--

25:10 30:8 33:8 34:4 43:22 44:25 50:5,19 53:7 54:4 54:19 58:19,24 60:3,22 61:11 63:16 66:9 68:2 73:12 74:11,15,20 75:8 78:20,23 80:1 82:2,7 85:11 85:13 87:12 91:12 93:3 95:23 98:19 98:21 100:21 gold 13:2 Gomez 2:12 3:5 5:13 7:1,17 13:17 16:10,15,19 29:10 61:24 80:21,23 81:4,8 88:18,21 99:17 100:18,20 105:20 good 4:10 6:23 63:17 70:22 83:22 goodbye 62:11 Goodrum 2:17 gossip 36:6 grabbed 48:1 grade 3:13 10:3,17 25:14 31:13 39:13 39:17 41:2,14 95:1,10 grades 11:2 40:21 44:4,8,18 77:14 93:15 95:15 gradually 39:20 grammar 95:6 Grant 2:13 great 8:15 11:19 74:22 87:4 94:20 group 74:13 guard 79:14 guess 13:5 39:5 94:23 97:20 98:5 103:21 guessed 87:9 guidance 80:4 guidelines 33:6 gunshot 60:5 guy 51:6	guys 19:5 gym 30:14,14 <hr/> H <hr/> half 63:18 86:23 87:2 hall 70:8 hallway 47:20 48:1 48:25 52:17 53:18 73:16 79:13 hallways 70:4 Halverson 3:13 hand 37:18 handed 81:20 handoff 14:25 handout 36:15 handouts 102:22 hands 26:18 99:6 handwritten 11:12 11:13 64:13 happen 6:1 41:16 happened 4:20 5:22,24 10:7 18:12 23:17 29:19 34:4 37:8 45:23 46:17 52:19 53:3 54:25 56:16 58:17 60:7 62:19 63:15 65:1 67:22 71:18 77:8,17 82:21 90:25 91:23 97:23 happens 46:13 63:10 happy 4:21 74:5,10 hard 24:17 87:13 98:21 head 7:14 104:19 105:7 health 68:21 69:11 hear 38:19,22 43:20 48:15,17,23 77:11 82:10 heard 26:7 29:16 38:16 41:15 56:22 57:6 60:18 86:4 hearing 97:10 100:24 heart 47:8	help 4:21 23:10 32:23 75:7 helpful 11:5 23:21 36:13 63:11,16 103:16,22,22 104:21 hereto 108:7 Hey 23:13,17 44:24 46:1,14 55:18 80:6 high 8:23 9:3 13:9 16:1 34:17 61:15 66:1,7 68:18 98:25,25 103:5 Hills 25:17 Himes 88:24 hold 20:6 hole 46:13 home 25:25 54:2 75:25 76:6 78:20 90:8 92:17 homework 16:8 19:13,15 95:18 honest 68:2 Hook 46:6 hope 33:6 hopefully 77:8 horrible 31:4 hour 26:25 48:22 53:14,15,16 54:3 54:4,12 55:16,18 74:4 78:2,10,12 78:12,13,16,19,22 79:5,8,17,22 81:14 91:2 97:9 98:11 106:13 hours 43:13 66:24 70:16 88:13 94:6 housekeeping 6:6 81:7 hug 100:11 huge 25:6 39:24 84:25 huh-uh 7:15 hung 26:8 hurry 46:4 hurt 85:11,11 husband 76:15	92:17,21 hypothetically 101:8 <hr/> I <hr/> ID 108:4 idea 25:1 55:6 58:9 ignoring 52:6 53:5 II 24:20 illegal 76:8 99:8 immediately 79:12 important 7:22 19:21,24,24 23:6 102:11 importantly 5:24 improve 74:12 75:6 improved 21:12,13 improvements 5:25 84:20 impulse 47:8 inadvertently 106:1,6 inappropriate 13:20 33:13 46:22 47:4,21 incidences 97:7 incident 25:9,12 28:12,15 37:8 38:15 39:9 42:5 42:11 45:4 51:4 52:16 54:19 57:24 58:8 60:12 62:19 63:6 75:11 80:13 100:25 incidents 28:8,20 29:18 41:15 42:9 59:4 99:15 includes 101:21 incorrect 89:22 increasingly 75:13 75:22 indicate 56:23 individual 102:16 Infinite 22:7,12,14 23:23 72:8 information 4:19 19:23 22:6 23:7 34:12 73:4 105:2	informed 17:9 informing 17:24 INITIAL 3:7 initially 57:25 input 96:23 100:14 instance 22:19 35:4 75:11 instances 106:1,5 instruction 7:19 16:25 insubordination 78:4 intensely 5:1 interaction 26:21 interest 34:10 interested 71:5 108:12 interrupt 16:10 88:14,18 interview 43:9 83:1 89:6,14,16 90:10 90:11 interviewed 43:5 67:13 68:15 70:22 71:9 82:24 88:12 88:16 89:7,8 interviews 82:25 investigation 3:15 29:17 42:17 65:19 investigative 3:15 65:21 70:1 investigators 43:6 43:10 involved 9:19 14:23 15:17 29:2 34:10 83:22 84:2 84:8 involvement 9:15 15:10,15 iPad 29:5 isolated 100:25 issue 14:15 15:7 23:12 33:9 35:24 44:15 61:12 66:12 66:14 99:2 issues 11:2,3 13:13 28:1 31:11,17,25 34:19 75:9 97:17
---	--	---	--	---

101:22 105:7,17 items 6:6	61:1,3,5 62:12 64:3 98:18	36:1,2,23 37:14 40:8 44:22 47:21	la 41:23 94:5	25:25 26:14 27:4
J	keyhole 46:8	48:16 52:23,23,24	lackadaisical 42:3	32:25 37:16 41:8
J 2:3	kick 38:4	55:8,10,12,24,25	ladies' 8:11	56:1 68:4 72:10
JAG 1:1	kicked 53:20 97:14	56:5 57:1,3,6 58:9	Lake 25:16	86:14 92:25 97:21
January 45:18	kid 9:22 25:22	60:4 61:7 62:12	language 84:18	102:10
job 9:8,13 62:13	27:23 44:25 49:18	63:16,22 64:1	105:14,15,15	Littleton 1:8 4:13
94:20 96:14,15,20	78:1 98:11 99:4,8	66:14 68:12,14,20	late 45:18	8:24 68:17
97:3,16	kid's 40:21	69:1 70:23 71:20	Lathrop 2:3	lived 22:23
joke 93:5	kids 5:11 25:14,20	71:20 72:5,9	law 66:8,20 69:6,18	lives 25:22
Jones 2:18	25:25 26:1 30:5,7	73:15,19,20,22	70:3,7 71:12,16	LLP 2:3
judge 6:7	36:7 46:9,15	75:5 76:1,8 77:19	lawyer 6:10	lock 78:18
July 1:2,13 3:2	47:18,19 49:18	79:21 80:6 82:11	lay 61:25	locked 46:6,7 47:2
106:14 108:16	52:23,23,24 55:22	83:7,14,17,18,19	learn 57:11	47:3,7 49:1,10
jump 16:17	59:25 67:15 74:24	84:11,18 85:13,18	learned 6:1 71:24	locker 85:15 98:23
junior 75:16	75:2,7 83:18,20	85:20 86:2,7 88:1	72:4,6	log 22:19,21,24
Juniors 65:4	84:23 85:21 89:12	89:17,18 91:2,24	leave 35:2 51:24	23:15,25 72:7
justifies 99:12	93:1,2 97:10,11	92:2,11 97:11,13	74:13 97:9,10	logs 24:11
justify 97:24 99:12	97:13,13 98:14	98:1,5 100:2,2,4,6	leaving 32:2 62:12	Lombardi 1:2,12
K	100:9,11	100:10 101:19	led 49:22	2:11 3:2,8,11 4:5
Karl 3:12 24:16,20	kill 55:6	102:3,11 104:4,11	left 27:6 38:13	4:10 8:20,22 46:1
26:1,4,5,16,19	kind 5:9 12:8 19:1	104:12,14,21	40:22 50:19 52:18	53:20 55:19 98:15
27:2,11 29:3,3,13	23:20,25 29:14	know/ 35:19	53:8 54:9 61:18	105:25 107:1,9,14
31:12,25 33:9	31:8 40:2 53:1	know/need 35:25	63:20 73:24 78:11	108:6
37:4,17,25 41:7	71:23 74:3 81:10	102:1,4	89:7 95:2	Lombardi's 37:21
41:15,20 42:9	87:13 89:9 92:25	knowing 83:20	legitimate 36:7	long 8:5 9:2 15:11
45:25 46:24,25	95:5 97:11 99:3	97:16	Lembke 2:17	17:20 34:4 52:10
47:2,6,21 48:5,13	102:9,18	knowledge 21:17	lessons 5:25 71:24	58:21 60:5 61:23
50:11,19,24 51:16	kite 98:25	21:20 95:17,24	72:3,6	70:23 87:1 102:8
51:23 53:8,19,22	knew 25:8 41:3	97:4,18,19 101:2	let's 17:23 20:2	longer 61:14
54:1,19 55:1,6,14	52:24 55:10 60:7	104:22	36:24 45:3 48:12	look 4:23 9:25
55:20 56:7,11	71:17,19 97:15	known 55:8 101:5	50:3 52:12 61:25	12:13 43:17 77:10
58:13 59:8,12,25	100:5,25 101:16	Kolasa 48:11 50:17	62:15 65:11 74:17	looked 22:21 26:17
62:18 64:15 70:17	101:23 104:7	50:24 51:15,19,22	97:21	26:18 54:2 67:7
73:15 75:13 78:6	knock 46:15 48:14	52:2,9 53:23	letter 18:17	77:14 100:4
89:25 92:12 94:20	48:15	54:16,18,22 55:1	letters 42:21	looking 20:9 49:18
96:6 99:22 106:9	know 4:11,15,16,19	56:15,23 57:4,12	letting 19:18	78:17
Karl's 30:19 32:17	4:22 5:7 6:10	57:18,24 58:3,4	level 99:15 104:14	looks 43:10
39:13 44:4,8,18	7:10 12:6,8,11	58:10 59:2,8	Lewis 16:8 50:15	los 37:13
49:21 93:15 97:5	15:18 16:20,20	60:12 61:9,12,14	life 44:17	lot 4:20 25:8 28:23
Katy 5:6 40:8	17:19,20 19:18	64:3 96:3 98:18	lightly 48:16	31:17 38:24 85:2
keep 19:22 46:6	20:5,18 21:24	Kolasa's 50:21	liked 54:23 80:17	85:21,23 97:14
53:5 72:7 74:20	22:6,10,11 23:5	58:14 62:3	limited 101:2	lots 71:2 72:1
102:12	23:18,20 24:9,17	Kolk 78:13,22	Lincoln 2:8	loud 46:20,21
Kevin 48:10 54:10	24:18,20 25:3,10	KP 3:11	lines 30:14	48:19,20
56:15 59:8 60:25	26:2 27:15,19	KRIS 2:12	listening 29:3 76:6	louder 48:14
	28:7,10,11 33:5		literally 89:25	love 5:11 32:12,12
	35:4,4,15,20,21		litigation 108:13	100:11
			little 16:24 22:1,4	low 39:14 103:5
		L		

LPS 9:5 21:23 71:15 72:25 73:9 lunch 46:11 luncheon 62:5	67:25 68:4,5 71:23 79:7,19 83:4,6,8 90:24,25 meetings 36:18 72:1,2 Melissa 35:17 members 21:21 66:6 68:24 71:7 80:15 memo 33:22 memorable 27:9 32:5 memory 6:19 34:7 102:7,19 mental 69:10 mentioned 106:2,6 mentions 106:9 Meredith 76:20 78:4 80:14 91:11 Meredith's 77:23 message 40:22 met 4:11 26:3 31:3 67:23 91:15,20 metallic 46:8 Mexico 37:17 Michael 1:5 2:3,16 2:18 107:25 Michelle 20:15 35:4 mid 28:4 middle 30:10 61:22 62:6,14 Mike 4:11 74:3 86:6 milling 71:2 million 95:20 100:12 mind 30:22 50:5 80:14 82:15 83:13 85:9 99:5,23 mindful 106:2 minute 63:18,18 minutes 26:25 30:17 38:13 46:19 48:10 50:18 52:10 53:12 74:14 missing 14:18 31:14 41:5 81:20	mistake 51:2 mistakes 36:11 43:19,21,25 72:18 73:1 100:10 mom 26:3,6,7 38:3 40:18,22 53:23,24 75:20 77:6 94:19 Monday 51:13 67:20,22 77:23 91:21 94:10 months 4:17,24 morning 66:24 77:13,23,24 78:24 88:12 91:9,22 mother 37:4 move 46:12,14 Muertos 37:13 Murphy 44:4,7,11 55:6 68:1 97:8 101:15 music 76:7	15:17 28:20 31:3 32:13 38:16 47:15 56:9,13 58:4 59:1 59:14 63:17,19 65:17 70:10 82:25 84:9,10,12,13 86:15 87:9 89:7 93:5 100:12 new 18:19 Nice 87:19 night 59:23 76:21 77:12 90:8 normally 7:6 48:17 76:2 north 73:16 Notary 1:14 107:20 108:4 notation 44:3 note 71:6,9 notebook 64:12 noted 71:7 notes 22:12 52:6 53:6,6 54:8 64:4,6 NOTICE 1:11 notified 66:9 November 28:12 37:4 39:23 42:10 94:18 number 14:22 29:18 42:22 49:24 85:17 numbers 42:21	occurrences 29:23 October 30:11 odd 31:8 32:14,15 38:18 offense 99:11 office 16:8 18:9,11 18:23 20:15 48:1 48:22 50:21 53:21 58:15 67:1 77:24 78:18,19 79:17 officer 60:4 88:23 88:23 oh 13:7 18:8 38:11 40:5 41:3 67:12 67:18 81:22 87:4 87:11 89:23 91:16 92:22 97:11,14 98:10 okay 5:17,22 6:4,5 6:6,15,21 7:4,12 8:2,8,12,14,21 9:10,25 10:9 11:5 11:19 12:11,14 13:3,7,11 14:2,10 14:20,24 15:6,13 16:15 17:7,14 18:2,8,19 19:3,16 21:20,25 22:2 23:22 24:11,19 25:18 26:8,24 27:7,10 28:7 29:16 30:8 31:6 31:23 32:4,15,23 33:4,10,18,21 34:1,3,8,22 35:6 36:15,21,24 37:3 38:4,11 39:9 40:5 40:8,12 41:1,10 41:11,13 42:4,8 43:14,20 44:19,21 45:3,20,23 46:4 46:23 48:12,19,24 49:9,11,16 50:8 50:13,22 51:5,9 51:14,18 52:1,15 53:2,9 54:14,21 54:25 55:11,13 56:2 57:11,17
M	ma'am 29:14 machine 108:7 mad 47:6 Mahe 1:13 108:4 mailbox 17:13 18:17 mailed 39:22 maintained 24:1 making 97:22 man 76:12,18 78:15 79:11 80:20 82:8 86:5 map 70:17,24 marathon 86:23 87:2 Marathons 87:1 March 22:17,18 35:16 36:17 mark 20:2 62:15 65:11 marked 3:17 20:4,8 36:25 42:15 45:6 45:12 56:4 62:16 65:13 math 35:3 matter 18:14 matters 108:6 Mauler 79:14 McCauley 3:8 88:23 mean 9:18 34:3 38:9 52:14 53:10 61:25 89:6 93:10 94:23 97:7 99:22 means 4:20 6:9,12 meant 8:5 34:7 media 73:5,10 medium 103:6 meet 27:16 32:13 58:12 87:18,19 91:21 meeting 35:15	N N 2:1 3:1 name 3:12 4:11 8:18 10:3,5 13:16 42:25 52:3 80:21 80:24 81:11 98:20 106:5 names 82:23,24 106:2 Natalie 60:19 62:8 62:9 76:16,22 78:2 nature 8:9 necessarily 14:9 need 8:11 25:21 35:19,20,20,21,25 35:25 36:2 38:1 46:10 48:2,6 50:16 55:22 75:10 76:16 78:18 86:7 101:25 102:4 needed 29:1 49:20 49:22 75:23 90:1 Neither 78:6 nerve-racking 12:9 never 7:20 11:21	O o'clock 26:11,12 76:21 Object 72:20 99:17 objection 73:3 objective 6:4 obscenities 36:2 obviously 14:11 24:15 28:8 30:13 34:3,9 38:15 45:4 60:16 71:11 84:23 106:8 occurred 72:19 73:2 occurrence 73:21	

<p>58:23 60:10 62:7 63:8,22 64:3,8,11 64:14,22 67:4,12 67:14,24 68:6,13 68:23 69:17,24 71:5,22 72:2,14 73:6,12,14 74:2 78:23 79:8,8 80:9 81:2,6,18,23 82:14 83:24 84:3 84:15,20 85:19 86:1 89:5 90:13 90:16 91:4,23 92:24 93:15 94:25 95:22 97:20 98:7 98:20 99:10 101:21 102:24 103:4 104:14 old 86:22 once 15:8 29:7,8 57:9,16 ones 68:12 84:12 102:25 online 11:11 23:25 open 73:24 opened 53:17 opinion 99:18 101:1,6 opportunity 18:8 81:5,8 order 6:9 80:24 102:12 ordinary 48:14 original 94:8 99:10 outcome 108:12 outside 47:19 50:1 50:2 85:15 overreacting 77:8 overseeing 6:8 owe 93:2 owes 54:7</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>P 2:1,1 P.C 2:8 p.m 1:13 12:23,23 74:18,18 106:13 packet 95:5</p>	<p>page 3:2 20:11 42:25 43:17 44:1 44:2 45:17 65:24 66:5 paper 36:23 paperwork 19:6 parameters 102:19 Pardon 96:17 parent 10:11,11 14:17,17 22:13 23:4 92:18 parent's 10:8 parent-teacher 30:10,19,25 31:9 32:9,12,15 parents 14:15 25:20 32:11,13,13 38:20,23,24 40:19 40:20 72:8 79:7 83:6 90:24 part 5:15 9:10,13 13:16 29:17,17 34:23 36:16 42:17 50:12,13 58:6 75:14 81:7 93:10 95:24 100:23 105:14 participate 90:19 90:21 103:2 participated 84:16 particular 25:9 99:11,21 particularly 75:17 parties 106:4 108:7 108:11 party 84:13 pass 46:10 path 26:14 Paula 16:8 50:15 pay 42:13 71:3 PC 23:5 people 62:11 68:20 68:25 71:2 74:24 83:14 89:3,15 percent 41:7 57:10 57:16 95:9,10,13 95:16,16,18,19,25 95:25</p>	<p>percentage 95:14 percentage-wise 94:25 perception 60:11 63:15 72:16,25 perfect 7:14 period 9:14 15:14 17:5,15,23 29:7,8 33:11 38:10 40:20 99:6 permitted 6:13 person 7:5 79:21 99:9 person's 6:19,24 personal 99:14,18 personally 15:17 84:9 personnel 71:15 perspective 63:9 102:16 phone 26:7 48:2 52:5 53:4,7 54:8 58:14 64:4,7 75:24 76:15 physically 49:14 64:18 pick 16:9 picked 25:21 26:1,6 92:12 93:1,3,4 pictures 11:25 piece 36:23 Pierson 3:13 24:16 26:22 27:1,11 30:24 31:11 32:16 33:9 37:11 38:14 39:13 42:9 55:14 56:11 59:12 62:18 92:11 93:8 106:9 Pierson's 37:4 pink 11:15,16,17 11:18 12:16 13:1 place 5:14 31:5 32:24 76:10 108:8 planning 90:24 player 44:23 please 16:7 43:25 79:15 point 29:1 31:18</p>	<p>75:22 95:11 99:10 points 82:14 95:3 95:12,13,23,25 police 45:16 60:2,4 88:9 policy 32:23 35:11 63:22 78:7 99:7 102:1,4 polite 48:14,15 possible 85:20 pounded 94:20,24 PowerPoint 36:22 practice 34:16 Pramenko 59:4,12 60:11 66:15,22 69:17 76:13,17 77:25 79:20 81:20 83:7 prefer 19:17 prefers 62:6,13 prepare 10:20 prepared 20:14 42:17 65:18 88:3 preprinted 11:7 13:4 present 2:15 66:7,8 presentation 36:16 preterit 39:24 40:1 40:3,11 pretty 29:5,25 38:9 48:19 63:17,21 70:20 preview 74:11 previous 101:15 108:5 previously 3:17 105:16 pride 83:20 principal 10:17,21 prior 9:6 17:15 21:23 23:24 24:7 24:12,23,25 27:11 27:19 33:11 42:6 56:11 59:13 97:4 97:19 privacy 21:1 proactive 19:17 probably 7:10</p>	<p>27:15 42:18 49:8 54:6 65:15 86:3 100:5 101:3,4 problem 18:21 34:23 35:23 50:4 Procedure 4:3 procedures 16:11 proceedings 4:1 106:12 108:9 process 8:16 9:16 9:19 15:14 17:24 18:3,20 produced 28:19 Professional 1:13 108:4 professionals 69:11 profusely 81:25 program 33:22 progress 3:10,18 42:16 50:23 projects 95:17 prom 76:10,23,24 77:10 protect 61:3,5 protecting 60:25 protective 80:24 provided 62:22 provocatively 44:14 psychologist 83:7 public 1:8,14 4:13 8:24 68:17 107:20 108:4 pulled 26:13,16 purpose 14:25 purse 12:18 pursuant 1:11 4:2 put 19:14 22:12 23:15 78:11 96:21 putting 79:10</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>question 7:9,10,25 16:14 24:6 37:18 57:23 74:16 85:3 86:3 questionable 76:5 questions 7:23 8:16</p>
--	---	--	--	--

17:1 74:23 86:1 88:2 90:16 100:22 105:22 108:9 quicker 105:3 quietly 41:19 quiz 102:24 quizzes 95:16	84:4 recommendations 75:9 record 7:15 8:19 12:24 20:13 45:13 74:19 88:21 105:23,24 106:7 records 12:1 41:5 94:13 recount 95:6 red 11:15 25:17,19 26:15 redact 98:20 redacted 39:6 redefined 72:10 redefining 102:10 redirect 29:5 reduced 108:8 reeking 98:13 reference 3:7 43:24 56:19 referencing 88:22 referral 9:24,25 10:4,5,12 11:1,21 12:15 13:10,18,25 14:6,12,14,19,21 15:1 17:12 22:3,7 23:2 82:20,21 83:2,3 referrals 10:19 11:6 12:3 referring 57:1 88:19 Refocus 42:14 regard 35:12 regardless 15:6 Registered 1:13 108:4 regular 29:6 related 4:23 108:11 relation 108:6 reluctance 73:9 reluctant 72:18 73:1 remember 12:17 23:5 27:13,16 32:1,2,3 33:16,25 36:19 44:7,17,22	45:1 48:16 57:18 60:14,15,24 66:23 68:3,4 69:22,23 69:25 70:12 72:15 80:3 89:18,20 90:4 98:11 102:20 removed 77:21 rephrase 8:2 replaced 106:8 report 3:10,12,16 3:16,18 9:23 19:8 19:9 24:1 39:9 42:16 50:10,23 52:1 56:7,8,11,15 65:22 88:2 90:6 Reporter 1:13 108:4 REPORTER'S 108:1 reports 24:9 represent 4:12 reputation 27:20 requested 108:21 required 108:25 requirements 106:3 resolved 14:16 respect 21:25 22:3 63:23 73:2 95:19 Respondent 1:9 2:6 response 10:8,8 11:23 38:3 47:3 56:1 responsible 10:21 47:24 50:6 rest 82:13 result 103:4 results 92:10 retake 31:15 40:25 41:6,8 94:15,16 retirees 62:12 retook 75:15 94:2 94:19 review 13:21 46:5 81:8 95:4,5,13 right 6:11 7:16 8:13 10:15,18,22 10:24 13:14 14:5	14:23 15:1,2,5 16:13,23 17:25 18:13 19:11 22:17 22:17 23:4 26:14 26:15,23 28:5,25 30:11,13,15,17,18 31:9 32:10 34:6 36:1 37:5,8 41:9 41:25 42:14 43:4 44:12 46:3,11 47:25 48:3,12 50:2 52:13,14,16 53:13 55:24 56:17 61:15,16 62:10 64:5,20 65:2,5 67:21 69:16,19 73:17 76:20,22 78:3,21 79:3 82:21 85:1 87:11 87:23 88:22 91:6 91:17 92:1 93:15 93:17,20 94:12 96:2 98:25 99:5 100:3 101:8,9,23 104:17 right-hand 42:20 rights 21:1 rise 80:13 99:15 road 6:22 Roche 2:3 3:3 4:9 4:11 7:18 12:21 12:24 13:3,23 14:5 16:13,16,23 20:2,5 29:16 30:3 30:8 39:1 62:2,15 62:17 65:11,14 72:21 73:6 74:5,7 74:17,19,20 80:25 81:2,6 86:9,25 87:4,7,9 99:24 100:16 105:21,24 rocked 94:19 Rocks 25:17,19 26:15 Rod 79:14 role 19:18 61:6 rolled 26:5 room 7:2 8:12	46:18 66:24 76:6 79:23 98:14 rooms 71:1 rounds 30:16 routine 18:14 routinely 17:16 rude 29:20 30:7 75:18,20 93:11 rule 7:23 rules 4:2 6:21 rumor 60:2 run 8:5 25:16 86:22 86:24 runner 86:17 running 25:14 86:22 87:12 93:9 Rust 48:4 50:10 53:19 76:13
R				S
R 2:1 radar 27:24 raised 37:18 49:5 ran 79:13 86:23 rang 46:1,18 55:25 79:10 rapid 48:18 re-interviewed 57:14 reach 71:16 reaching 77:17 read 44:9 56:22 63:14 107:2 Reading 108:21,23 108:25 ready 8:17 46:5 55:17 74:20 real 8:5 really 4:15,18 6:23 6:23 7:21 12:13 29:14 32:11 37:20 44:10 46:21 47:11 47:13 54:9 58:4 62:6 77:2 82:24 90:4 94:21 98:6 100:2 reason 6:16 13:18 13:24 19:13 52:21 reasoning 96:8 reasons 17:16 recall 33:21 37:23 39:6 43:5 49:5 56:23 60:21 62:7 66:12 70:7 71:11 71:14 88:16 97:22 receive 16:6 receiving 103:25 Recess 12:23 74:18 recommendation				S 2:1 78:25 79:2 safe 19:23 102:12 safety 71:25 74:13 75:6 80:16 82:17 84:22 Sandy 46:6 Sarah 2:17 sat 31:2 84:12 Saturday 59:23 saw 30:5,6 43:19 54:3 56:3 70:10 77:14 78:14 82:25 saying 5:21 12:12 17:12 18:17 33:8 36:11 59:25 60:17 says 7:1,2,3 13:9,18 13:24 14:17 16:6 42:21 43:17 44:3 46:24 48:3 50:23 51:2,15 71:6 scare 47:23 76:3 78:14 scared 46:21,22 47:10,11,11,12,13 47:14 49:12 50:24 50:25 51:1,3,6,8 51:10,17,23,23 52:20,20,24 53:1

54:10 55:21,22 56:20,20,24 57:5 57:7,8,13,21 59:8 60:8,17,18 64:15 77:7 81:23 scares 50:25 51:2 51:16 schedule 54:3 school 1:8 8:23 9:3 9:5,16 13:9 14:23 16:1 19:23 27:21 34:17 61:15,22 62:6 63:19 64:23 66:1,6,7,21 67:2 67:23 68:10,18,18 69:8,18 70:3,4,5 70:24,25 71:24 73:15 74:13 75:6 76:4,23 78:7,15 79:25 80:1,2 82:17,17 84:5,21 85:18,21 93:10 102:23 school's 75:7 schoolers 62:14 Schools 4:14 8:24 68:18 Scott 68:1 screamed 47:2 screaming 47:5 49:7 53:20 seat 27:5 79:12 seats 86:9 second 10:4 12:22 54:3,4,11 55:16 58:5 70:17 78:12 78:13,16,19 89:14 94:14 96:3 103:1 seconds 63:19 secretary 58:14 security 79:14 see 19:10 20:16 21:2 22:21 23:8 23:13,17,19 39:15 42:20,25 43:24 44:5 49:12 51:21 53:7 56:10,14,16 56:19 62:20 63:6	63:11 64:7 65:24 66:10 70:5,11 71:9 72:8 74:12 75:6 77:18 78:13 84:5,21 85:4,6 92:5,8 99:4 seeing 77:19 seen 42:18 51:11,12 56:6,7 63:2,7 64:1 64:2 65:15 73:5 73:10 84:13 seldom 47:16 semester 24:21 25:1 28:4 46:5 55:3 58:5 75:14 82:13 95:6 Semple 2:8 send 11:22,25 senior 98:12 seniors 65:4 98:12 sense 7:24 8:1 23:22 54:21 72:24 83:13 85:9 sensitive 77:9 sent 18:15 37:4,10 39:23 45:18 September 108:18 sequestration 6:9 serious 14:1,4,7 28:22 47:5 seriously 54:22 57:24 58:8 60:13 80:16 services 13:2 session 36:17 set 99:3 setting 76:23 settled 38:7 seven 9:4 84:9 severall@smpc... 3:11 shake 60:4 shakes 7:14 share 21:4 sharply 39:21 41:2 she'll 26:10 sheet 17:12 sheriff 68:1 89:15	sheriff's 20:14 29:17 42:17 43:6 43:10 50:10,23 52:1 67:1 shooting 5:22 9:14 15:15,20 16:12,22 17:1,3,10,16,24 20:16 21:8,23 22:11,16 23:11,15 23:24 24:8,12 33:7,12 35:9,12 42:6 43:6,13 45:10 52:14 55:5 55:9 56:12 59:9 59:10,13,16,23 62:25 63:25 64:22 71:23 72:17,19 73:20 76:4 79:1 83:11 86:6 89:17 98:10 101:20,24 shopping 27:1 short 55:25 58:22 shorthand 108:7 shortly 45:8 show 12:19 13:15 20:7,9 26:3 70:25 78:15 shows 82:6 side 26:16 27:5 signature 107:13 108:16 significant 16:17 signing 108:21,23 108:25 simply 91:4 Sisler 79:14 site 25:15 sitting 55:17 76:6 79:11 82:9 89:19 situation 35:5 75:21 82:4 100:6 sixth 53:14,15,16 54:12 79:17,22 91:2 97:9 sketch 28:11 slammed 79:23 slide 46:8 slides 36:23	sliding 39:14 slipped 40:12 44:4 slower 12:7 slowly 39:20,22 40:12 smell 99:1 smelled 98:14 smiling 12:8 so-and-so 82:11 somebody 7:19 33:12 35:2 65:18 82:10 somewhat 18:1 21:11,12,13 92:15 son 27:2 31:5,21 soon 38:9 75:25 sophomore 75:15 sophomores 65:6 99:3,4 sorry 13:5,22 16:11 21:25 26:17 34:2 35:21 36:20 38:21 40:2 44:20 50:9 51:1 52:14 55:19 58:17 59:17 67:18 71:4 72:23 73:12 76:2 77:2 80:12 80:19,22 81:1,2,3 81:25 82:11 83:9 91:16,18 95:23 98:19 sort 14:24 28:10 29:20 38:2 sounds 19:16 26:24 82:15 100:7 spades 5:3 Spanish 9:1,11,12 24:20 35:1,3 40:4 41:24 45:24 105:14 speak 10:11 58:10 66:8 89:2,5 speaking 9:21 95:17 special 13:2 specific 10:12,13 10:17 33:21,22 speculate 101:9	spelled 43:1 52:2 spend 25:8 spent 70:21 spiral 64:12 spoke 14:15 22:24 58:4,10 spoken 10:11 spring 22:19 84:11 84:19 98:9 ss 108:2 staff 35:15 62:9 66:8 67:18 71:7 71:16 stairs 26:15 standard 46:14,15 102:3 standing 80:5 stands 30:22 Starbucks 93:2,4,6 stared 47:7 start 5:18 7:8,9 25:21 31:8 32:10 37:19 48:14 54:17 79:9 80:5 started 8:15 33:20 39:17 47:14,19 49:1 60:4 starting 46:4 starts 28:4 state 4:6 8:18 72:23 107:15 108:2,4 statement 3:14 20:15,22 45:7,15 50:10 51:15,18 53:22 62:18 67:5 67:10 90:14 97:22 statements 63:5,8 63:24 stay 90:2 stayed 78:20 steering 26:19 step 50:2 89:19 STEVE 2:7 stipulation 106:4 stoned 99:4 stood 27:4 stop 7:11 14:18 29:12 31:13 38:1
--	---	--	--	---

<p>story 76:17 77:3 straight 26:17,18 strange 76:7 Street 1:12 2:4,8,13 stressful 86:14 stricken 106:7 strike 27:18 38:18 54:15,17 strip 46:8,12,14 strokes 14:10 36:5 struggle 33:1 stuck 52:22 student 3:14 10:7 10:13 12:25 13:9 13:21 14:15,16 15:11 16:4,7 17:12,19,20,21 18:5,22,24 19:18 20:25 22:19 23:12 24:2 33:3,14 35:23 36:1,3 47:15 50:2 62:17 63:4,24 75:12 77:3 79:6 80:7,16 80:16,19,23 83:6 83:9,10,14,18 84:22 85:10,14,18 90:17 91:15,20,21 98:19 99:18,19 102:12 103:1,1,25 106:8 student's 10:3,7 17:17 21:1 22:13 24:9 63:9,15 106:5 students 5:1 9:16 9:18,20 15:21 16:5 18:22 19:5 29:21 32:22 33:24 34:18,20 37:20 44:13 47:25 49:11 56:20 57:5,7 63:4 64:23 68:15 69:13 72:12 82:22 83:1 83:19,19 84:17 85:16 89:7,8 90:2 104:23 105:9 students' 106:1</p>	<p>studied 38:12 study 41:8,22 stuff 76:24 79:12 stumble 7:24 subject 3:11 55:2 subjective 102:15 submitted 56:15 subscribed 107:14 substance 99:8 sudden 46:17,20 Suite 1:12 2:4,9 summary 43:9 summer 25:13 86:23 93:9 summers 25:13 Sunday 76:11 77:12,13 supplement 3:15 70:1 supplemental 65:21 supposed 32:21 81:16 82:12 83:12 sure 4:22 23:23 25:23 27:14 28:10 31:16,19 34:11 37:15 38:2 57:10 57:12 63:14 68:12 70:23 72:24 85:8 86:10 100:24 suspected 47:18 suspend 54:6,19 78:5,8 81:22 96:6 97:16,25 98:22 99:8 suspendable 54:7 98:1,4,6 100:5,23 101:3,3 suspended 15:11 15:22 16:5,7 17:13,20,21,21 18:5,22,25 19:19 78:3,3 79:21,24 81:17,21 98:19,22 99:20 104:23 suspension 17:17 19:10,12,14 96:15 97:24 99:12,13,15</p>	<p>99:16,23 suspensions 17:9 17:25 sweet 85:23 switched 79:1 sworn 4:6 107:14 108:6</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>tablet 29:5 tacos 40:6 take 4:23 6:25 8:6 11:25 19:3,17 21:12,15 24:18 32:4 38:7 41:9 54:23 56:10 74:5 74:10,14,14,17 78:10 83:20 84:3 91:17,19 99:13 taken 1:12 4:2 12:23 60:12 62:13 74:18 103:20 108:7 takes 19:22 22:25 talk 6:13,17 7:5 12:7,10 17:23 19:7 23:19 24:15 27:2 28:9 31:12 32:16,21 33:13,23 35:18 36:9 37:25 42:4 44:24,25 45:3 50:3 58:12 59:9 68:24 75:24 76:11 90:1 97:11 97:13 talked 5:13 41:3 50:17 59:12 60:6 71:12 76:15 93:16 103:24 104:18 talking 6:2 7:8,9 8:10 14:6 16:22 17:15 22:4 27:6 29:4,12 44:7,17 49:5,6 51:3 53:5 64:3 68:7 70:21 87:20 89:18 99:24 101:8,25 tangent 73:13</p>	<p>tapping 48:17 target 26:10 70:20 taught 78:11 79:17 teach 9:1,10 91:2 teacher 5:9 8:25 9:13 13:1 14:11 15:9,15 20:20 23:12,16 31:5 33:2,8,12 35:24 36:2 48:20,22 63:5 68:21 82:5 83:22 84:18 85:10 96:13 99:19 103:25 teacher's 10:4 96:15 102:16 teachers 5:1 17:25 19:18 20:25 25:22 29:21 31:20 32:17 32:21 33:14,23 34:17 35:19 63:11 63:23 72:12 77:16 83:12 84:1,8,16 103:23 teachers' 29:19 teaching 9:8 33:20 37:13 71:7 80:6 90:22 team 25:5,7 tedious 19:2 tee 33:6 teenagers 28:23,24 29:12 100:9,10 tell 4:14,18 5:14 6:22 8:1,7 14:11 18:2,7 20:24 25:12 30:24 31:19 35:1,14 37:10 39:12 43:25 45:13 45:23 52:8,19,20 52:25 54:10,16,18 55:1,13 57:3,7,7 58:19 59:6,15,20 60:17,17,19 61:11 66:14,17 67:21,22 69:21 70:19 71:17 74:7,8,15 78:9,17 80:9 81:23 82:3</p>	<p>82:12,25 86:4,6 100:11 104:6,9,15 telling 31:21 56:24 57:19 temper 103:13 tense 40:3 tequila 28:13 30:6 37:19 42:5 97:6 terrible 31:20 test 8:6 31:15 34:7 39:24 40:1,2,3,15 40:25 41:7,16,20 41:21 42:2,6 93:16,21 94:8,14 94:18,25 testified 4:7 testify 108:6 testimony 6:14 64:15 107:4 108:9 tests 41:17,19 95:16 thank 4:14 5:4,8 8:8 24:15 26:18 45:23 75:4 81:11 86:8 87:17,19 100:15 105:22 Thanks 37:3 100:14 theater 70:8 theater/auditoriu... 71:20 theatre/auditoriu... 70:5 71:8 therapeutic 87:13 thick 95:5 thing 4:24 7:13 12:5 23:20 36:7 37:14 38:12 46:14 46:15,17 59:7 70:19 81:10 95:4 96:1 97:6 things 8:10 14:8 16:18 17:1,3 29:2 31:4,20 34:4 39:12 40:6 47:9 63:20 76:8 82:15 83:9 85:2,5,17 101:10</p>
---	--	--	--	--

think 5:5 7:21 8:1,4 12:18 16:18 18:19 19:21,22 20:1 22:17 23:6 24:10 27:8 31:14 34:10 34:21 35:22 36:4 36:19,19,22,23,25 38:1 41:5 43:16 50:17 54:7,24 60:14 62:4,5,8,8 63:10 72:13 74:11 75:10 76:9,16 77:13 80:9 83:22 85:17,22,25 86:1 90:23 91:14 93:7 93:25 94:12,13,23 95:20,21 96:20 97:3 98:2,3 101:10,13 102:9 102:17,22 105:19	three-part 10:2 12:15 three-quarters 44:2 Thursday 65:5 67:16 89:12 94:3 94:6 tied 99:7 time 6:25 7:6 8:7 9:14 15:14,18,21 15:21 17:5,15,23 19:4 24:18 25:8 26:2,2 32:5 33:11 34:5 36:18 42:10 44:10 48:6 52:13 54:11 56:3,11 58:10 62:23 70:21 70:23 76:20,25 79:7 87:21 96:3 97:15 100:12 101:1,1,12,14 104:20 108:7	top 13:7 56:17 top-of-the-lungs 49:6 topic 19:25 totally 8:12 44:21 81:13 track 72:7 105:3 Tracy 44:4,7,11 45:2 55:6 trade 86:9 tragedy 71:25 72:4 73:2 trained 35:17 training 33:22 36:17 84:7,14 102:8 transcript 81:9 108:9 transcription 107:4 transferred 82:2 traumatized 68:3 traumatizing 70:21 trigger 103:13 triggered 91:24 triggers 80:8 103:9 103:11 104:10 trophy 73:16 trouble 9:17,23 85:18 true 5:2 31:18 50:12 107:3 108:8 truly 87:13 truth 4:6 108:6 try 5:23 7:7 10:11 18:23 30:9 43:23 trying 12:13 33:10 61:2,3,5 81:1 Tuesday 79:25 80:19 81:16 turn 10:10 11:14 100:13 turned 11:22 55:20 79:11 twice 49:23 51:15 52:11 80:21 Twitter 23:3 two 27:4 43:13 47:17 52:18 55:24	65:1 66:24 68:16 69:15 70:15 75:14 77:14 82:15 87:23 89:1 93:19 two- 40:20 type 6:24 56:8 99:14 typed 45:7 81:20 88:3 types 6:23 63:4,8 63:24 typewritten 43:9 108:8 typically 63:6 typing 53:5 64:10	upset 32:13 58:16 60:15 66:7,15,17 69:18 77:25 80:18 use 8:11 useful 63:11 usually 7:18 11:1 30:10
thinking 47:20 60:24 third 10:4 55:17 78:22 86:24 thought 13:5 37:18 46:12,16 50:5 52:22 57:25 76:14 78:19 81:21 97:22 100:12 threat 15:13,18 55:2 77:21,22 79:19 80:7 82:4 83:4,11,13,21,25 84:7,8,10,16 85:12,13 90:17 91:1,3,24 92:3,5,8 101:15,17 102:25 103:5 104:2,7,15 threaten 78:5 threatened 55:6 threatening 85:11 99:19 threats 80:16 three 12:16 13:6 25:4 47:17 50:18 52:9 53:10,11 98:12 three-day 40:20	times 16:25 17:2 36:14 47:17 52:4 59:22 60:6 87:22 87:23 95:20 title 13:8 today 8:5 54:10 told 16:5 17:14,16 31:2,23 33:12 35:18 43:22 44:15 50:24 51:15,19,22 52:5,19 53:3,24 53:25 54:2,9 57:4 57:12 59:2,7,7,8 60:7 61:19,20 62:1,2,6,7 64:6 66:15 69:17 75:21 76:17 77:3 78:16 79:5,18,22 82:7 83:1,5,8 84:1,6,6 90:1 91:6 92:10 92:22 96:5 101:15 101:17 103:4,8,11 103:14 104:2,8,8 105:7,16 tomorrow 54:5 76:10 79:22,24	transcript 81:9 108:9 transcription 107:4 transferred 82:2 traumatized 68:3 traumatizing 70:21 trigger 103:13 triggered 91:24 triggers 80:8 103:9 103:11 104:10 trophy 73:16 trouble 9:17,23 85:18 true 5:2 31:18 50:12 107:3 108:8 truly 87:13 truth 4:6 108:6 try 5:23 7:7 10:11 18:23 30:9 43:23 trying 12:13 33:10 61:2,3,5 81:1 Tuesday 79:25 80:19 81:16 turn 10:10 11:14 100:13 turned 11:22 55:20 79:11 twice 49:23 51:15 52:11 80:21 Twitter 23:3 two 27:4 43:13 47:17 52:18 55:24	U uh-huh 7:14,19 8:3 18:10 29:9 49:3 90:18 unable 78:8 uncomfortable 33:2 unconsciously 6:18 understand 5:20 6:20 7:12,16,25 19:4 22:15 23:10 28:18 30:18 32:23 34:14 38:16 45:7 52:2 64:14 85:6 88:2 92:12 97:20 Understandably 68:6 understanding 10:15 16:11 23:23 61:17 83:10 understood 32:24 58:19 unexcused 14:16 22:20 unintentionally 6:18 unlock 46:16 unlocked 73:20 unsettled 49:17 unsettling 47:13 unusual 29:11 uploaded 22:7	vague 32:25 verbal 19:8,9 verbally 29:20 Vicki 43:3 62:1 105:25 Victoria 1:2,12 2:11 3:2 4:5 8:20 107:1,9,14 108:6 Victorie 43:2 video 37:16 vie 41:23 94:5 view 42:1 violated 33:6 violation 21:1 voice 29:14 49:6 voiced 21:21
			U	W
			wait 11:23 50:2 76:21 94:16 waited 26:3 waiting 26:8,25 91:21 waived 108:23 walk 18:9 35:3 70:24 78:23 walked 37:24 48:1 52:16,21,25 55:18 57:8 60:18 71:1 78:23 79:12 80:10 want 4:14 5:9,14 8:6 12:19 20:7 23:19 24:15,17 28:8,9,10 33:2 41:9 43:20 74:14 75:5 76:3,19 77:4 77:18,21 78:2,3 78:14 79:21 81:11 86:4,9 96:22,25	

<p>98:2 100:22 wanted 20:1 35:23 41:22 42:24 43:22 43:25 58:18 70:16 74:22 77:6,22 78:1,2 90:2 91:7 94:15 wanting 40:25 wants 12:6 54:1 warrant 99:23 101:10 Washington 76:9 wasn't 14:16 24:4 29:1 32:2,20 47:11,22 49:25,25 50:1,4,14 51:5,7 52:6 53:24 54:6 54:18 61:23 64:11 73:25 76:2 87:23 89:6,21 91:9 101:3 103:21 104:20 watched 37:16 watching 85:22 water 46:2 Waterton 25:16 wave 26:17 way 22:12 25:15 31:8 33:19 35:22 39:10 44:2 52:21 57:8 60:18 63:20 72:6 74:9 85:17 92:17 96:21 99:14 100:13 we'll 78:10 81:2,4 81:24 91:17,19 we're 8:10 14:6 34:25 36:12 46:4 59:15 68:7 78:17 91:12 101:8 we've 10:10 20:8 29:16 60:8 73:10 106:4 Wednesday 51:13 67:17 68:10 70:13 88:12 94:11,11 Wednesdays 25:15 weed 98:13,24</p>	<p>week 39:24 86:22 weeks 86:15 87:12 weighted 95:15 welfare 13:20 well-being 13:12 went 41:18 47:19 48:9,10,21 51:25 52:17 53:18,21 58:15 78:21 79:9 79:16 89:23 90:8 98:16,18 weren't 28:22 31:24 32:21 91:4 93:1 101:14,17 102:18 104:9 wheel 26:19 WHEREOF 108:15 white 11:15,17,17 12:15,25 widely 55:8 widespread 21:17 willing 100:7 witness 6:22 108:15 witnesses 6:12,16 word 26:20 30:2 61:7 worded 72:5 words 6:24 7:24 55:24 wore 74:3 work 8:21,23 9:5 61:21 62:13 75:10 81:20 85:7 95:14 95:18 worked 9:2 17:1,3 17:9 workers 68:21 working 72:11 works 61:14 world 84:18 105:15 worry 76:3 91:19 worse 18:20 75:22 worth 95:8 wouldn't 35:2,3 97:15 write 9:24 10:6</p>	<p>14:19,21 23:1 38:24,25 40:19 writing 64:11 95:17 written 28:21 58:13,18 62:18 66:5 67:5,10 70:2 88:2,4 90:6 wrong 20:6 36:6 39:2 50:13 51:21 52:3 82:16 wrote 45:16 48:16 53:22 67:11 75:23 77:13,16,20,20 82:19,20 83:2 90:9,15</p> <hr/> <p style="text-align: center;">X</p> <hr/> <p>X 3:1 108:21</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p>yeah 11:17 16:19 32:6 36:20 41:3 43:19 52:4 61:4,8 86:24 87:11 89:24 92:22 94:23 year 25:10 75:15 75:16 years 9:4 25:5 75:15 84:9 86:15 100:12 yell 47:15 yelled 55:19 101:12 yelling 47:15 49:1 49:18 yellow 11:15,16,17 11:18 12:16 13:1 Yep 87:25 yesterday 44:10 55:19 young 76:12,18 78:14 79:11 80:19 82:8 86:5</p> <hr/> <p style="text-align: center;">Z</p> <hr/> <p style="text-align: center;">0</p> <hr/> <p style="text-align: center;">1</p>	<p>1 39:23 42:10 105:11,12 1/27/14 3:11 10 26:11,12 95:9,19 95:24 100 3:5 25:7 57:10 57:16 95:20 11 28:16 42:10 45:4 45:24 56:16 60:12 62:20 96:3 97:23 1120 2:8 11th 30:6 55:1 64:4 64:16 97:9 99:25 100:25 12 3:13 12/13 43:13,17 12/18 43:15 12/18/13 3:9 12/23/2013 3:16 12:15 79:7 90:25 125 25:7 12th 55:14 1308 2:9 1399 42:25 1400 44:1 15 26:25 95:18 1500 2:13 15th 30:12 108:16 16 3:18 20:9,13 16th 30:12 67:22 17th 1:12 2:4 18 45:16 66:1 68:19 69:19 88:6 90:11 18th 45:11 67:17 68:7 70:13 71:6 71:12 19 4:17,24 1st 93:25</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2 1:2,13 3:2 65:24 66:5 75:17 2:04 1:13 2:13 12:23 2:14 12:23 20 3:8,18 46:2 48:3 48:7 50:16 53:17 67:3 79:1</p>	<p>200 22:25 20084033353 108:4 2013 16:18 24:21 25:1 27:19 30:18 31:1 36:24 37:5 45:16 2013-269/18 3:16 2014 22:20 36:17 45:18 75:12 2015 1:2,13 3:2 27:12 106:14 107:17 108:16 2015-0665A 1:1 2016 108:18 206 18:21 21 3:8 20:3,4 37:1,3 22 3:10 42:15,16 45:5 23 3:11 45:6,12,14 88:19 90:5 24 3:12 56:4,6 108:18 24-year-old 87:6,7 2400 1:12 2:4 25 3:14 62:16,17 87:8 95:3,12,12 95:13,23,25 26 3:15 65:13,14,24 27th 58:11 28th 58:11 2nd 106:14</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>3:37 74:18 3:48 74:18 30 95:16,25 35 95:10</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 3:3 94:13 4:25 106:13 42 3:10 45 3:11 95:15 49 41:7,12,21 49's 93:19 4th 77:12</p> <hr/> <p style="text-align: center;">5</p>
---	---	---	---	--

5 78:25 79:2 94:7
500 83:18
54 86:14 87:12
56 3:12
5th 94:8

6

6,000 14:22 47:16
48:2 50:7,14,15
51:24 82:8 98:16
6:15 77:24
62 3:14
65 3:15

7

7/2/15 107:25
7:30 25:21 76:20

8

8 76:21
8:45 25:21,25
80202 1:13 2:5
80203 2:9,13
86 3:4

9

9:00 77:1
9:15 26:5
950 1:12 2:4
9th 25:14 94:4,4,5