

1 JAG NO.: 2015-0655A

2
3 DEPOSITION OF: NATALIE PRAMENKO - November 6, 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 NATALIE PRAMENKO was taken on behalf of the Claimants
14 at 950 17th Street, Suite 2400, Denver, Colorado
15 80202, on November 6, 2015 at 9:06 a.m., before Ellie
16 K. Liebenow, Registered Professional Reporter and
17 Notary Public within Colorado.

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<p>JAG NO.: 2015-0655A</p> <hr/> <p>DEPOSITION OF: NATALIE PRAMENKO - November 6, 2015</p> <hr/> <p>IN RE THE ARBITRATION OF: MICHAEL and DESIREE DAVIS, Claimants, and LITTLETON PUBLIC SCHOOL DISTRICT, Respondent.</p> <hr/> <p style="text-align: center;">PURSUANT TO NOTICE, the deposition of NATALIE PRAMENKO was taken on behalf of the Claimants at 950 17th Street, Suite 2400, Denver, Colorado 80202, on November 6, 2015 at 9:06 a.m., before Ellie K. Liebenow, Registered Professional Reporter and Notary Public within Colorado.</p>	<p style="text-align: center;">I N D E X</p> <p>EXAMINATION OF NATALIE PRAMENKO: PAGE November 6, 2015</p> <p>By Mr. Roche 5</p> <p>DEPOSITION EXHIBITS: INITIAL REFERENCE</p> <p>Exhibit 49 Arapahoe High School Student 68 Planner/Handbook, 2013-2014, Littleton Public Schools</p> <p>Exhibit 50 Arapahoe High School Student 68 Planner/Handbook, 2014-2015, Littleton Public Schools</p> <p>Exhibit 51 Federal Bureau of Investigation, 126 12/16/2013</p> <p>Exhibit 52 Excerpt of the Deposition of 142 Victoria D. Lombardi, 7/2/15</p> <p>Exhibit 53 Colorado Bureau of Investigation, 158 ACISS Investigative Supplement Report 2013-269/24, Report Date: 12/26/2013</p> <p>Exhibit 54 Notes from AHS Hotwash Activity - 163 Crisis Response Debrief, June 10, 2014</p> <p>Exhibit 55 Districtwide Principal Feedback on 163 Crisis Response Process</p> <p>DEPOSITION EXHIBITS: (Previously marked)</p> <p>Exhibit 1 Littleton Public Schools Student 19 Code of Conduct</p> <p>Exhibit 9 LPS Threat Assessment/Danger 16 Assessment Training Overview</p> <p>Exhibit 11 Littleton Public School District's 131 Answers and Responses to Claimants' First Set of Interrogatories and Requests for Production of Documents</p>
<p style="text-align: center;">2</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>For the Claimants: MICHAEL J. ROCHE, ESQ. Lathrop & Gage, LLP 950 17th Street Suite 2400 Denver, Colorado 80202</p> <p>For the Respondent: STEVE EVERALL, ESQ. Semple, Farrington & Everall, P.C. 1120 Lincoln Street Suite 1308 Denver, Colorado 80203</p> <p>Also Present: Michael Davis Desiree Davis William Woodward Carol Lembke Sarah Goodrum Lois McClure Linda Kanan Connie Bouwman Michael Jones Brian Ewert</p>	<p style="text-align: center;">4</p> <p>Exhibit 12 2013-2014 Arapahoe High School 97 Administrative Team Meeting, August 30, 2013</p> <p>Exhibit 14 Letter to our Arapahoe County 105 Citizens from Walcher, with attachment</p> <p>Exhibit 16 Progress Report 28</p> <p>Exhibit 17 Littleton Public Schools, 188 Administrative Review of LPS Threat Assessment Protocols, June 24, 2014</p> <p>Exhibit 20 Progress Report 104</p> <p>Exhibit 24 Behavior Detail Report, Name: Karl 109 Halverson Pierson Grade: 12</p> <p>Exhibit 28 Progress Report 67</p> <p>Exhibit 29 E-mail to Kolk, 12/12/13, FW: 67 Final Letter</p> <p>Exhibit 35 Threat Assessment & Action Plan 113</p>

5

1 WHEREUPON, the following proceedings
 2 were taken pursuant to the Colorado Rules of Civil
 3 Procedure.
 4 * * * * *

5 NATALIE PRAMENKO,
 6 having been first duly sworn to state the whole truth,
 7 testified as follows:
 8 EXAMINATION
 9 BY MR. ROCHE:
 10 Q. Good morning. Thanks for coming in.
 11 Obviously, you and I know each other; so I'm not going
 12 to stand on formality, but we really do appreciate
 13 your coming in to give testimony in connection with
 14 the arbitration that the Davis family and Littleton
 15 Public Schools are engaged in right now. I wanted to
 16 walk you through some of the general rules of the road
 17 for a deposition. I'm assuming you haven't had the
 18 experience of a deposition before this?
 19 A. No, I haven't.
 20 Q. Okay. Ellie, who you just met, is going
 21 to be taking down everything that is said in the room
 22 today, all of my questions, all of your answers, any
 23 objections that Mr. Everall may voice as part of the
 24 deposition. So I wanted you to know that.
 25 A. Okay.

6

1 Q. I wanted you also to know that you will
 2 have the opportunity after the deposition is over to
 3 review the transcript --
 4 A. Okay.
 5 Q. -- that Ellie prepares, and you'll be
 6 allowed to make any changes to that transcript that
 7 you think are appropriate. If, you know, I misstate a
 8 question, if you misstate an answer, if, you know, on
 9 the drive home you think, okay, there's something I
 10 should have added to that answer, you'll have the
 11 opportunity to do that; so I wanted you to know that.
 12 A. Okay. Thank you.
 13 Q. Couple of things. Ellie can type really
 14 fast, but she can only take down one person talking at
 15 a time. I'm sure as a principal of a high school,
 16 you're familiar with the idea of people talking over
 17 each other. So we're going to try not to do that,
 18 okay?
 19 A. Okay.
 20 Q. Another important rule of the road for
 21 depositions is this is not an endurance test. We're
 22 going to be here for a while today, and generally I'll
 23 try to take a break every hour to an hour and a half
 24 or so. But if you want to take a break for any reason
 25 during the deposition, even if it's five minutes from

7

1 now, just tell me and we will; okay?
 2 A. Okay.
 3 Q. Another just kind of logistical rule of
 4 the road is it's important to give verbal answers
 5 rather than head shakes or uh-huhs because those can
 6 be misinterpreted later, okay?
 7 A. Okay.
 8 Q. And then, finally, most importantly,
 9 there will come a time during the deposition today
 10 where I ask a question that doesn't make any sense to
 11 you. It happens in every deposition, and it's just
 12 part of the deal. So when that happens, will you let
 13 me know you don't understand the question and I'll try
 14 to fix it because that's my responsibility; all right?
 15 A. Okay.
 16 Q. Perfect. Let's talk a little bit about
 17 what the purpose of this arbitration is.
 18 MR. ROCHE: Is that one already empty?
 19 I just have a cold. I apologize.
 20 Q. (BY MR. ROCHE) I'm sure you've heard
 21 some about the arbitration, but I am telling everyone
 22 this. The purpose of this arbitration is not to prove
 23 that someone or some organization was negligent. Do
 24 you understand?
 25 A. Yes.

8

1 Q. And the purpose of this arbitration is
 2 not to lead to a lawsuit or to recover any money from
 3 Littleton Public Schools or anybody else, okay?
 4 A. Yes.
 5 Q. What this arbitration is intended to do
 6 is -- well, there's two components. There's what I'm
 7 calling the backward looking component to it, which is
 8 trying to understand what led to the shooting that
 9 occurred on December 13th of 2013 that took Claire's
 10 and Karl's life; all right?
 11 A. Okay.
 12 Q. The other component of this arbitration
 13 is what I'm referring to as the forward looking piece,
 14 which is how do we stop that from happening again.
 15 And as I'm sure you've been told, the results of this
 16 arbitration, including this deposition and including
 17 the reports that are going to be prepared by Ms. Kanan
 18 on behalf of LPS and Bill Woodward and Sarah Goodrum
 19 down at the end of the table, those reports are going
 20 to go, among other places, to the legislature. There
 21 was a school safety and youth in crisis committee
 22 created earlier this year, frankly, with a lot of help
 23 from the Davises to study ways to prevent tragedies
 24 like the one that took Claire. And these reports are
 25 going to go to that committee with recommendations on

9

1 **how to improve school safety, okay?**
 2 A. Okay.
 3 **Q. So that's the purpose of what we're**
 4 **doing here today. It's not to embarrass. It's not to**
 5 **cast aspersions. There will be some hard questions,**
 6 **obviously; but everything we are doing in this is done**
 7 **with an eye either to the backward looking piece or**
 8 **the forward looking piece, all right?**
 9 A. Okay.
 10 **Q. With all of that said, why don't we**
 11 **start with just a little bit of background on you. As**
 12 **I understand it, you've been the principal at Arapahoe**
 13 **for, what, three or four years now?**
 14 A. I'm in my fourth year.
 15 **Q. Right. And prior to that -- well, how**
 16 **long had you been at Arapahoe prior to becoming**
 17 **principal?**
 18 A. So this is my 12th year total at
 19 Arapahoe. Prior to being principal, I was an
 20 assistant principal in the office of curriculum and
 21 instruction; and I was also our head cheerleading
 22 coach during that time.
 23 **Q. So you would have started in --**
 24 A. 2004 was my first year at Arapahoe.
 25 **Q. And you started as an assistant**

10

1 **principal, right?**
 2 A. At Arapahoe, yes.
 3 **Q. Okay. And prior to Arapahoe, you had**
 4 **been in Englewood somewhere; right?**
 5 A. Englewood Schools for 11 years. I was a
 6 teacher, a science teacher there. I don't know if
 7 it's relevant, but all areas of science but my degree
 8 was in biology so I ended up landing in the biological
 9 sciences, teaching that, and biology, general biology,
 10 and human anatomy and physiology. I was also the --
 11 had a strong interest in student leadership and
 12 student activities. At Englewood High School, it was
 13 a class, our student leadership. Student council is
 14 what it is at Arapahoe. It was a class, and so I also
 15 taught that. I did Link Crew. I coached our
 16 cheerleaders there. Just highly involved in student
 17 life outside of the classroom. And then became an
 18 administrator, went from the classroom to -- into
 19 administration as an assistant principal at Englewood,
 20 and I would have stayed there for another four years
 21 as an assistant principal.
 22 **Q. Okay.**
 23 A. So that's my ...
 24 **Q. Got it. And then in '04 is when you**
 25 **moved --**

11

1 A. Over to Arapahoe.
 2 **Q. -- to Arapahoe as an assistant principal**
 3 **and as the cheerleading coach?**
 4 A. I didn't become the head cheerleading
 5 coach until the second year there, 2005.
 6 **Q. Oh, okay.**
 7 A. The coach was still in the classroom and
 8 coaching at the time. And so when she retired,
 9 Mr. Booth asked if I wanted to apply; and I was very
 10 honored to be able to do both because I loved being
 11 with the kids at that level in addition to my
 12 responsibilities as an assistant principal because at
 13 Englewood, once I became an assistant principal, I was
 14 not able to coach any longer.
 15 MR. EVERALL: People are asking you to
 16 speak louder.
 17 THE DEPONENT: Oh, I'm sorry. I have a
 18 cold and that's part of it; but I will absolutely
 19 speak up. I keep thinking I'm talking just to Mike.
 20 I apologize.
 21 MS. KANAN: Where is that principal
 22 voice?
 23 THE DEPONENT: I do have my -- I can put
 24 my coaching voice on a little early.
 25 **Q. (BY MR. ROCHE) Right. And the only**

12

1 **other thing I would say is I understand this can be an**
 2 **intimidating environment; and when people get nervous,**
 3 **they talk really fast.**
 4 A. I talk fast.
 5 **Q. And you talk fast anyway.**
 6 A. I will pay attention to that. I
 7 apologize. I'll speak more slowly and louder.
 8 **Q. Okay. I just don't want to kill Ellie.**
 9 A. Right. I get it.
 10 **Q. I've seen far, far worse. All right.**
 11 **Let's talk a little bit more about your position at**
 12 **Arapahoe. Were you teaching any classes as an**
 13 **assistant principal? That's not really your role, is**
 14 **it?**
 15 A. No.
 16 **Q. And so your student contact was**
 17 **primarily as a cheerleading coach and then also as a**
 18 **grade level assistant principal?**
 19 A. Right. The cheerleading was an extra
 20 thing outside -- above and beyond the school day.
 21 That wasn't something I did during the school day at
 22 all. My responsibilities as an assistant principal,
 23 in addition to the curriculum and instruction, so the
 24 master schedule and the course offerings and all of
 25 that, I was assigned to a grade level of students.

13

1 We -- at the time -- and it's changed since; but at
 2 the time, we had an assistant principal paired with a
 3 counselor and we worked with a grade level all the way
 4 through except for the freshman year. We used to pair
 5 up. When we had an additional assistant principal, we
 6 had two assistant principals that worked with the
 7 freshmen; and then once they became sophomores, we
 8 took them -- I like, for example, picked up the Class
 9 of 2006 as sophomores and took them through -- or,
 10 actually, that was my first class. 2010, I picked
 11 them up as sophomores, took them all the way through.
 12 The Class of 2013, picked them up as sophomores,
 13 carried them all the way through.

14 **Q. Okay.**
 15 A. Those responsibilities are, you know,
 16 just really overseeing the students academically,
 17 behaviorally, and attendance-wise; so we work with
 18 teachers, counselors as an administrative team just
 19 really trying to -- the goal is to make sure that
 20 every student, you know, graduates on time with their
 21 class.

22 **Q. Sure.**
 23 A. And so you try to intervene with
 24 anything that might interfere with that. That's part
 25 of that role as an assistant principal that I had.

14

1 **Q. Right. And did you ever serve as --**
 2 **during your tenure as an assistant principal, were you**
 3 **the grade level assistant principal for the Class of**
 4 **2014 for any years?**
 5 A. No, no. 2013 was my last class. So I
 6 only had three. I had 2006, 2010, and 2013, which
 7 when I became principal, I had to turn my
 8 responsibilities over to one of my assistant
 9 principals, Steve Sisler. He picked them up to finish
 10 the year with them because I became principal.

11 **Q. All right. And the reason I ask is when**
 12 **I deposited Darrell Meredith, he seems to think you may**
 13 **have been the grade level assistant principal for the**
 14 **Class of 2014, Claire's and Karl's class, their**
 15 **sophomore year?**
 16 A. No.
 17 **Q. He got that wrong?**
 18 A. Yeah, he definitely got that wrong.
 19 That was Kevin.
 20 **Q. Okay. So he stayed with them all four**
 21 **years, Kevin Kolasa did?**
 22 A. Well, Darrell would have had them -- I
 23 believe we were still under that model. Darrell would
 24 have had them as freshmen, and then Kevin would have
 25 picked them up sophomore year.

15

1 **Q. Okay. And you became the principal when**
 2 **Ron Booth retired?**
 3 A. Correct.
 4 **Q. And that was in two thousand --**
 5 A. Beginning of 2012, '13 school year.
 6 **Q. And what were your job responsibilities**
 7 **as principal?**
 8 A. That's a big question.
 9 **Q. Yes.**
 10 A. Overseeing everything about the
 11 operations of Arapahoe High School. I mean, that's a
 12 pretty general answer. I mean, if you could maybe ask
 13 more specifically.
 14 **Q. Sure.**
 15 A. What you're --
 16 **Q. Sure. No, I'm happy to do that. Was**
 17 **part of the responsibility of the principal at**
 18 **Arapahoe High School to make sure that the faculty**
 19 **members were familiar with school policy?**
 20 A. Um-hum. Yes.
 21 **Q. And was part of your responsibility as a**
 22 **principal at Arapahoe High School to ensure that**
 23 **faculty and staff received the training that they were**
 24 **supposed to receive?**
 25 A. Yes.

16

1 **Q. And was part of your responsibility as**
 2 **principal at Arapahoe High School to make sure that**
 3 **those policies were followed not just by students but**
 4 **also by the faculty?**
 5 A. Yes.
 6 **Q. All right.**
 7 (Cell phone ringing.)
 8 **Q. Well, as you know, one of the issues**
 9 **that has come up during the course of this arbitration**
 10 **is who was and who was not trained on how to perform a**
 11 **threat assessment; right?**
 12 A. Um-hum.
 13 **Q. Prior to the shooting that occurred in**
 14 **December of 2013, right?**
 15 A. I've heard that, yes.
 16 **Q. And have you seen any of the paperwork**
 17 **related to that?**
 18 A. Specifically to what? To --
 19 **Q. Who was trained and who was not?**
 20 A. No, no.
 21 **Q. Okay. Well, in the stack of books in**
 22 **front of you, there's one -- I think it's this one.**
 23 **There's a tab that you can look at. And I'm going to**
 24 **ask you to look at Tab 9, which is Exhibit 9 to one of**
 25 **the depositions that we've already taken in this case.**

17

1 A. And these are the people who have been
 2 trained in what year?
 3 **Q. Yeah. And I will tell you what this**
 4 **document is a document that was prepared by the**
 5 **attorneys for Littleton Public Schools in response to**
 6 **a question that I asked in writing, which was: Who**
 7 **received what training when on how to perform a threat**
 8 **assessment?**
 9 MR. EVERALL: Actually, for the record,
 10 the document wasn't prepared by the attorneys.
 11 MR. ROCHE: Oh, it was prepared by LPS
 12 and produced by the attorneys. Fair enough.
 13 **Q. (BY MR. ROCHE) And as you look at this,**
 14 **you'll see that prior to the shooting in December of**
 15 **2013, there's a total of seven or eight people at the**
 16 **school who had gone through the threat assessment**
 17 **training that Littleton Public Schools provided. Do**
 18 **you see that?**
 19 A. Yes.
 20 **Q. You're not on that list, right?**
 21 A. No.
 22 **Q. And Kevin Kolasa is not on that list?**
 23 A. Correct. This page is prior to. Am
 24 reading that correctly?
 25 **Q. Yes, yes. And then if you look --**

18

1 A. The second page is after.
 2 **Q. Immediately after the shooting, just a**
 3 **couple of months after, you attended, Kevin Kolasa**
 4 **attended, a whole bunch of people from Arapahoe**
 5 **High School went through that threat assessment**
 6 **training; right?**
 7 A. Correct.
 8 **Q. And I can tell you I've also looked at**
 9 **the sign-in sheets for the training that is described**
 10 **here, and Kevin Kolasa also isn't on that list; okay?**
 11 A. Yeah.
 12 **Q. Did you know prior to the shooting at**
 13 **Arapahoe High School that Kevin Kolasa had not gone**
 14 **through LPS's training program on how to perform a**
 15 **threat assessment?**
 16 A. I did not know that.
 17 **Q. Did it concern you -- Well, strike that.**
 18 **How did you learn that Kevin Kolasa had**
 19 **not been through the threat assessment training and**
 20 **when did you learn it?**
 21 A. I don't believe I learned that until
 22 recently, way after.
 23 **Q. Okay. And did that concern you?**
 24 A. At the time, no, because I knew Esther
 25 Song had been through the training; and when they did

19

1 the threat assessment paperwork, I had specifically
 2 asked to make sure she was involved in that because I
 3 knew she was -- I considered her the expert in our
 4 building. She was the only psychologist we had, and
 5 she had had the training.
 6 **Q. Okay. And did you know at the time that**
 7 **Karl Pierson's threat assessment was being done that**
 8 **Esther had been through this training?**
 9 A. Yes.
 10 **Q. Okay.**
 11 A. I don't know that I had seen any
 12 documentation of it, but I knew that she had been
 13 trained.
 14 **Q. Okay. Take a look at Exhibit 1, if you**
 15 **would. It's at the very front of that book. Do you**
 16 **recognize Exhibit 1 as the LPS student code of**
 17 **conduct?**
 18 A. Yes.
 19 **Q. For the 2013-2014 school year?**
 20 A. Yes.
 21 **Q. And did you expect your -- not just your**
 22 **students but also your faculty to be familiar with**
 23 **this code of conduct?**
 24 A. Familiar with it, yes.
 25 **Q. Okay. Not memorized. And I understand**

20

1 **that. Did Arapahoe or the district provide any**
 2 **training or summaries to faculty about what was in the**
 3 **student code of conduct?**
 4 A. Not faculty, just to administrative
 5 staff.
 6 **Q. Okay. Tell me about that. What did the**
 7 **administrative staff at the school receive by way of**
 8 **training on the student code of conduct?**
 9 A. Each -- specifically this year, I think
 10 it was Karen Goodwin was still in the position to give
 11 the training for the -- it was discipline -- a
 12 discipline training; and she came to Arapahoe and met
 13 with our whole team and kind of -- it's kind of an
 14 overview of the discipline process. It's certainly
 15 not walking through the entire document but kind of
 16 highlighting some -- any of the changes that may have
 17 been made to codes, just more of an overview of the
 18 process.
 19 **Q. Okay. And that was specific to**
 20 **discipline, right?**
 21 A. Yeah, discipline. And I feel like 504
 22 training might have been a part of that, but that
 23 might have been a separate training that I remember
 24 coming out of her office as well. But definitely the
 25 discipline piece, which is where the code of conduct

21

1 comes into play.

2 **Q. And the discipline training that you're**

3 **describing that Karen Goodwin did this year, was that**

4 **a new thing or was that something that had been done**

5 **prior to the shooting as well?**

6 A. It had been done every year, offered

7 every year for assistant principals to go to the

8 district for a couple of different opportunities; so

9 they didn't offer just one training but a couple of

10 different kinds to fit different schedules to go to

11 that training. The year I became principal, I asked

12 for Karen to come to the school so we all could

13 share -- we'd hear the same message and share the same

14 questions that we might have around it as a team. So

15 that part was new.

16 **Q. That was new this year?**

17 A. That was new the year I became

18 principal.

19 **Q. Okay. I got it.**

20 A. Bringing her to our school versus

21 sending assistant principals at various times to the

22 training.

23 **Q. All right. And was it your expectation**

24 **as principal that all of your assistant principals**

25 **would go through that training?**

22

1 A. Yes.

2 **Q. And I want to direct your attention to a**

3 **page in the student code of conduct. You'll see in**

4 **the lower right-hand side there's bold print that says**

5 **LPS. If you'll take a look at page 01113. It's also**

6 **page 54 of the exhibit itself.**

7 A. Okay.

8 **Q. If that helps. Have you got that there?**

9 A. Yes.

10 **Q. In the middle of the page, roughly,**

11 **there is a section of the student code of conduct**

12 **titled "Disclosure of Disciplinary Information to**

13 **School Personnel." Do you see that?**

14 A. I do.

15 **Q. And are you familiar with that provision**

16 **of the student code of conduct?**

17 A. I am more familiar with it now.

18 **Q. Okay. In this section of the student**

19 **code of conduct, it reads, "In accordance with state**

20 **law, the principal or designee is required to**

21 **communicate disciplinary information concerning any**

22 **student enrolled in the school to any teacher who has**

23 **direct contact with the student in the classroom and**

24 **to any counselor who has direct contact with the**

25 **student. The purpose of this requirement is to keep**

23

1 **school personnel apprised of situations that could**

2 **pose a risk to the safety and welfare of others."**

3 **Right?**

4 A. Yes.

5 **Q. And you had mentioned that you are more**

6 **familiar with this requirement of the student code of**

7 **conduct now than you were before the shooting, right?**

8 A. Absolutely.

9 **Q. And have you had any -- well, were you**

10 **at all familiar with this requirement prior to the**

11 **shooting?**

12 A. I was not.

13 **Q. Okay. And were --**

14 A. Not specifically this paragraph as you

15 read it.

16 **Q. Okay.**

17 A. I think we interpreted differently in

18 practice.

19 **Q. And that's certainly what seems to have**

20 **come out of the depositions that I've taken in this**

21 **case is prior to Claire being killed, the practice at**

22 **Arapahoe High School was that the administration did**

23 **not communicate disciplinary information to the**

24 **teachers of the student who was the subject of the**

25 **discipline; is that right?**

24

1 A. Yes and no. Some information is

2 communicated. If there is a suspension, for example,

3 it will show on the teacher's -- all teachers have

4 access to the students in Infinite Campus as far as

5 attendance goes, so it would show up as an S. So they

6 would know that a student was suspended, though they

7 may not know the reason why.

8 **Q. Right.**

9 A. And it was not practice to go and share

10 why with a student -- I mean, with a teacher.

11 **Q. Okay. And that practice of telling**

12 **teachers that a kid was suspended but not why, has**

13 **that changed since Claire's death?**

14 A. Yes, and especially around anything that

15 we would consider a dangerous or harmful, potentially,

16 type situation of discipline. But our teachers still

17 do not have access to the behavior tab in Infinite

18 Campus; but we have explicitly said multiple times in

19 staff meetings, trainings that we've had with the

20 staff around discipline, if they ever have a question

21 to come see an administrator -- a counselor or an

22 administrator and that we're much more open and

23 willing to share things about students.

24 **Q. Okay. And why is that?**

25 A. I think the whole goal is to try and

25

1 truly create like a vortex of information around a
 2 student. We also added a tab onto Infinite Campus for
 3 teachers where teachers can see on every student --
 4 it's called an AHS teacher tab, I believe is the title
 5 of it, where they can put in any communication with a
 6 parent, a student, whatever the issue was they have
 7 with a student in class, they called a parent, they
 8 referred it to an administrator, they referred it to a
 9 counselor so that all teachers could see more
 10 information about a student. That didn't exist at all
 11 prior to this. Just really try -- the more people
 12 that know, the better off I think we are in trying to
 13 help a kid.
 14 **Q. I agree.**
 15 A. Yeah.
 16 **Q. And was one of the purposes for**
 17 **increasing the communication with teachers about**
 18 **behavioral or disciplinary problems or issues with**
 19 **kids to make sure that those teachers knew what to**
 20 **look for and how to report it back to the**
 21 **administration?**
 22 A. Yeah, definitely.
 23 **Q. Okay.**
 24 A. Yeah, definitely. Or the counselor. I
 25 mean, it could be one or the other or both.

26

1 **Q. Sure. Do you have an understanding of**
 2 **why this requirement from the student code of conduct**
 3 **wasn't followed the way it was written back in 2013?**
 4 A. I think it just had been the practice.
 5 We didn't -- we wanted to make sure that kids weren't
 6 inappropriately judged by teachers, that they were
 7 given a fair shot whether they moved from, you know,
 8 one teacher to another teacher from year to year, that
 9 if something happened in one classroom, it didn't
 10 necessarily mean that it was going to happen again,
 11 give them a fresh start with a new teacher, that kind
 12 of thing, really just erring more on the side of
 13 protecting the kid, giving them a second chance.
 14 **Q. Okay.**
 15 A. I hate that it's had to change, but I
 16 think it's had to change. You know, we have to be
 17 able to communicate more with one another about kids.
 18 We just do.
 19 **Q. Okay. Well, and one of the issues that**
 20 **has come up as part of this arbitration is FERPA. You**
 21 **know what FERPA is, right?**
 22 A. Yes.
 23 **Q. And it certainly looks to me like**
 24 **Littleton Public Schools and Arapahoe High School may**
 25 **have had some misunderstandings about what FERPA**

27

1 **permitted and didn't permit back in 2013.**
 2 A. Yeah.
 3 **Q. So I'm going to ask you pointblank. Do**
 4 **you agree with me?**
 5 A. I do think I would say I erred more on
 6 the side, as a principal, of protecting the kids and
 7 they had rights and not sharing all of that. I was
 8 under the impression we shouldn't be sharing all of
 9 that detail with every teacher that had contact or
 10 coach or sponsor that had contact with that kid.
 11 **Q. Well, and that's my question. Do you**
 12 **think you were laboring under a mistaken understanding**
 13 **of what FERPA permitted and prohibited back in 2013?**
 14 A. Misinterpreted, I think, yes.
 15 **Q. Okay.**
 16 A. And maybe too tight of an understanding
 17 around our ability to share information about kids,
 18 yes.
 19 **Q. Okay.**
 20 A. And I -- can I add?
 21 **Q. Sure. Go ahead.**
 22 A. I have a new -- newer -- this is her
 23 second year on my team -- assistant principal that
 24 came to me with over 15 years of experience in
 25 Cherry Creek Schools; and I don't think it's abnormal

28

1 that we operated that way. She's a little sometimes
 2 surprised of the things we do now share with our
 3 teachers. I don't think it's abnormal for us to feel
 4 in schools in general, public schools, that we might
 5 have been interpreting FERPA on the -- erring on the
 6 side of a kid. So learning more about FERPA for me
 7 has been that whole need to know.
 8 **Q. Sure.**
 9 A. And being able to empathize. I feel
 10 like I could back up now who needs to know.
 11 **Q. Okay. No, and I --**
 12 A. I have a little bit of a different lens
 13 on that, of course.
 14 **Q. Sure. Well, and if you want to take a**
 15 **look -- I'm going to direct you to Exhibit 16, which**
 16 **is related to this same subject. You'll see this is a**
 17 **report from the Arapahoe County Sheriff's Office**
 18 **describing a conversation with Michelle Crookham**
 19 **shortly after the shooting. And you know**
 20 **Ms. Crookham, right?**
 21 A. Yes.
 22 **Q. She's one of your teachers?**
 23 A. She is.
 24 **Q. At the very end of this statement, she**
 25 **makes the observation that "AHS administration will**

29

1 **not tell the teachers anything about student**
 2 **discipline as it is a violation of the student's**
 3 **privacy rights." Do you see that?**
 4 A. I do.
 5 **Q. And was that, in fact, a common**
 6 **complaint that the administration heard after the**
 7 **shooting?**
 8 A. No. I didn't ever hear it as a common
 9 complaint. As I said before, I think it's just how we
 10 operated. It's definitely what I felt was the correct
 11 thing to be doing. I don't feel that way any longer.
 12 **Q. Okay.**
 13 A. But I didn't hear that as a constant
 14 complaint or concern from teachers.
 15 **Q. But was it a discussion point after the**
 16 **shooting?**
 17 A. Yeah.
 18 **Q. The teachers would have liked to know**
 19 **about the fact that Karl had been the subject of a**
 20 **threat assessment and, in fact, had threatened to kill**
 21 **a faculty member?**
 22 A. Yes. We all talked about it though. I
 23 think even administratively we all talked about how
 24 could we make this better, like I said, create that
 25 vortex of information, improve the way we communicate

30

1 with one another, all of us, about students.
 2 **Q. All right. So you mentioned that the**
 3 **practice at Arapahoe High School has changed with**
 4 **respect to the sharing of disciplinary information**
 5 **since the shooting, right?**
 6 A. Yeah.
 7 **Q. And you mentioned the AHS teacher tab,**
 8 **right?**
 9 A. Yes.
 10 **Q. What kind of information goes into that**
 11 **teacher tab on Infinite Campus?**
 12 A. Any communication that the teachers want
 13 others to see that they've had about a student. It's
 14 a limited amount of characters. We were only given a
 15 hundred and something, I think, characters to put
 16 details in there; but if they wanted to say come see
 17 me or see an administrator. And then there are
 18 drop-down menus that say referred to a counselor,
 19 referred to an administrator, talked to a parent,
 20 talked to the student. So there's different levels
 21 of -- that would alert a teacher to a different level
 22 of concern about a student, if you will. So they
 23 really could put almost anything they want. They just
 24 can't put as much -- as many words as they want.
 25 **Q. All right. And from what you're**

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1 **describing to me, teachers can add information to that**
 2 **tab on a given student; right?**
 3 A. Yes.
 4 **Q. And it would then be incumbent on that**
 5 **student's other teachers to go in and look at that?**
 6 A. And find it, yes.
 7 **Q. And find it?**
 8 A. Yes.
 9 **Q. So information isn't being pushed out to**
 10 **a student's teachers about disciplinary information**
 11 **even today?**
 12 A. Every discipline issue that results in a
 13 threat assessment document being completed is
 14 explicitly pushed out to all of those teachers, both
 15 on the front end of asking them to participate in
 16 those conversations and gather -- data gathering, if
 17 you will, on a student. Every teacher that currently
 18 has a student or has immediately had -- we had a
 19 threat assessment -- for example, if we had one come
 20 into play now -- we're about halfway through a
 21 semester -- a teacher may not have as much as they'd
 22 like to know. We may go back to last year's teachers
 23 and gather information from them. And any of them,
 24 all of them are invited to attend the actual -- when
 25 we sit down and complete the documents for the threat

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1 assessments, they are now all invited to participate
 2 in that. Not all of them have chosen to do that in
 3 practice since we've implemented this, but the ones
 4 that know the student best both on the kind of good
 5 experience and bad experience or feedback for a kid
 6 are sitting at the table helping complete that
 7 document. So definitely with threat assessments.
 8 **Q. What about suspensions? Is information**
 9 **about why a suspension occurs pushed out to a**
 10 **student's teachers now?**
 11 A. It isn't. And we -- I don't know that
 12 we have -- I don't want to say permission. We have
 13 not had conversations with the district folks yet
 14 about doing that because I don't believe that's
 15 practiced in any of our buildings right now, to
 16 explicitly push discipline out to the teachers. So,
 17 no, not all suspensions are pushed out, although, as I
 18 said earlier, we highly -- at Arapahoe highly
 19 encourage our teachers if they have any questions,
 20 concerns, or anything about it, we wouldn't be cryptic
 21 in sharing information. We will tell them why that
 22 student was suspended. And I think that's a big
 23 change in our -- I don't think. That is a big change
 24 in our practice.
 25 **Q. Well, why -- I'm going back to -- and I**

33

1 **apologize for bouncing around. I'm back on page 54 of**
 2 **the student code of conduct.**
 3 A. Is that No. 1?
 4 **Q. It's No. 1. Why is LPS or Arapahoe**
 5 **High School still not communicating disciplinary**
 6 **information concerning a student to any teacher who**
 7 **has direct contact with that student?**
 8 A. Well, as I said, they do know about
 9 suspensions. The suspension doesn't say -- in the
 10 attendance tab doesn't say the reason. I don't -- I
 11 don't know. We just -- I don't feel comfortable as
 12 the building principal implementing that without some
 13 discussion with other principals.
 14 **Q. All right.**
 15 A. I can't answer that question directly
 16 for the whole district.
 17 **Q. Okay. And as I understand it, there**
 18 **were some changes that you wanted to make with respect**
 19 **to information sharing at Arapahoe High School after**
 20 **the shooting that Littleton prohibited you from**
 21 **making?**
 22 A. They kind of had to back me off a little
 23 bit because I took that FERPA interpretation of need
 24 to know as everybody needs to know everything about
 25 every kid. And I don't fully understand FERPA law. I

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1 do know that students have some rights still. So I
 2 really -- they didn't prohibit me. I can't remember
 3 any specific examples where they said you can't tell
 4 people that or you can't tell teachers that. I think
 5 it was just more around think about who needs to know
 6 and go with that, and that's where -- that's the space
 7 where I'm operating from right now.
 8 **Q. Okay. Well, and clearly one of the**
 9 **things that I'm very interested in is what changes**
 10 **were made at Arapahoe or throughout Littleton Public**
 11 **Schools after Claire was killed. And as I say, I had**
 12 **heard from other witnesses about your wanting to open**
 13 **the communication window more broadly than LPS did.**
 14 **So what I'm trying to get at now is, you mentioned**
 15 **that they tried to back you off a little bit on some**
 16 **things. Tell me what they backed you off on.**
 17 A. Okay. I think the two things are
 18 information in Infinite Campus. The one is the
 19 discipline tab, weren't ready to be sharing that out
 20 with the whole staff. And that's, I believe, as
 21 simple as turning the tab on for a certain level of
 22 employees who have access to Infinite Campus. So
 23 right now, I believe it's only administrators and
 24 counselors. I'm not even positive counselors can see
 25 it, but I think they can -- can click on the behavior

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1 tab and review that. And it goes back to as long as
 2 they've been in Littleton Public Schools.
 3 **Q. Okay.**
 4 A. So the behavior tab would be one that I
 5 think is worth a discussion about opening up.
 6 **Q. Okay.**
 7 A. The second --
 8 **Q. Let me stop you there. I do want to**
 9 **hear about both. But with respect to the behavior or**
 10 **discipline tab, as I understand it, you wanted to open**
 11 **that discipline tab up to a greater universe of LPS**
 12 **employees or school employees than the district wanted**
 13 **you to?**
 14 A. I don't remember specifically it being
 15 just about that discipline tab. It was just about how
 16 can we get more information out to the kids -- I mean,
 17 out to the teachers.
 18 **Q. Okay.**
 19 A. I don't remember if they said you can't
 20 open the discipline tab. I don't know if I -- I don't
 21 remember if I specifically said let's open it right
 22 now to everyone. We had discussion about it; and I
 23 still think it's worth having discussion about the
 24 discipline tab, especially since that's our policy.
 25 **Q. Well, that's why I'm asking the**

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1 **question.**
 2 A. Yes, yes. I know. I hear you. It's
 3 not in place yet.
 4 **Q. Who has access to the discipline or**
 5 **behavioral tab now?**
 6 A. Definitely the administrators.
 7 **Q. Who else?**
 8 A. I'm pretty sure the counselors. And
 9 that might be all at this point.
 10 **Q. All right. The teachers do not. You're**
 11 **sure of that?**
 12 A. I'm 99 percent sure they do not have
 13 access to the discipline tab right now.
 14 **Q. All right.**
 15 A. I'd have to log in as a teacher to make
 16 sure.
 17 **Q. What about the school resource officer?**
 18 A. No, I don't think he does. I'm not
 19 100 percent sure about that either. I think he has
 20 the summary page. There are some laws around what we
 21 can and can't share around kids with law enforcement,
 22 specifically in our student database system; but
 23 I'm -- so I'm not sure what he has access to -- they
 24 have access to.
 25 **Q. All right. Has there been any**

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1 **discussions with LPS about whether or not -- well,**
 2 **about whether or not the school resource officers**
 3 **should be provided access to the disciplinary**
 4 **information that's maintained on Infinite Campus?**
 5 A. I remember a conversation in our
 6 trainings as an assistant principal around that, and
 7 it has -- it has to do with the way we respond to
 8 discipline issues, whether we can handle them as a
 9 school or whether we have to get law enforcement
 10 involved; and that's why I don't believe they have
 11 access to everything in Infinite Campus. And FERPA
 12 might have something to do with their right to see all
 13 of that on students too. And I don't know the law
 14 well enough to tell you where we are with that.
 15 **Q. Okay.**
 16 A. Can I go -- can I respond to that No. 2
 17 piece?
 18 **Q. Yes. That was my next question.**
 19 A. Okay. So the other tab that caused a
 20 lot of angst in my mental health staff with -- that I
 21 thought would be a good one for us to just open up and
 22 share out in my immediate days of share everything
 23 with everyone was what's called the counselor contact
 24 log. And it goes, again, all the way back to the
 25 student's first days in LPS. Many students have

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1 absolutely nothing in there short of met with
 2 counselor for a schedule change. But there is a --
 3 there are also many students who have some pretty
 4 significant private conversations with counselors; and
 5 they were very anxious about, well, then now that's
 6 going to be opened up to the whole entire teaching
 7 staff and that's where that whole -- some stuff when a
 8 kid goes in to meet with a counselor is -- they think
 9 is in confidence and they share things that they don't
 10 want other teachers to know and whatnot. So we have
 11 not opened the counseling contact log up. Currently
 12 administrators and counselors and school psychologists
 13 are the only ones that still have access to that. But
 14 that's something that may be also worth discussing in
 15 getting information. And while it does not explicitly
 16 contain consequences for discipline, oftentimes those
 17 conversations or things that happened in the
 18 counseling log are related to discipline issues. So
 19 those are the two areas we discussed; and I was ready
 20 to open up, if you will, for everyone. And people had
 21 to kind of back me off a little bit on that.
 22 **Q. And that was going to be my next**
 23 **question. Who were the people who were backing you**
 24 **off from opening up the behavioral detail portion of**
 25 **Infinite Campus and the counseling content?**

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1 A. A lot of people. I mean, everyone from,
 2 you know, like I said, the mental health staff for
 3 sure, not wanting that counseling information out
 4 there, looking out for kids first and foremost and
 5 feeling like that was too much. Melissa Cooper, Nate
 6 Thompson really were my primary go-to people on what
 7 can I share. I feel like I need to share everything.
 8 What's appropriate? What's not appropriate? They
 9 came in and helped -- helped us all. I don't want to
 10 say just my teachers, helped us all understand what's
 11 appropriate and what's not. And I felt okay at the
 12 end of the day knowing I was going to be all right or
 13 any of my assistant principals that if somebody had a
 14 question or wanted to ask why was this kid suspended,
 15 what was this all about that we could share it, and
 16 that was going to be okay. We weren't going to be in
 17 trouble for that. It was a need to know. It was --
 18 it was in the best interest of kids. It wasn't just
 19 gossip. Does that make sense?
 20 **Q. Okay. And it's been now almost**
 21 **23 months since the shooting. I don't know exactly**
 22 **when those changes were implemented, where in that**
 23 **23-month window. But have those changes proven, in**
 24 **your opinion, to be helpful to the school and to**
 25 **getting kids the help they need?**

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1 A. Well, so I would say yes, they've
 2 definitely been helpful to the school in feeling more
 3 open communication around students. We've had -- I
 4 think teachers feel more comfortable bringing forward
 5 a piece of writing, perhaps, that a student did in a
 6 language arts class or, you know, any kind of
 7 information that they might be concerned about. I
 8 think that the lines of communication have opened up
 9 more and, because of that then, more opportunities to
 10 hear about maybe a struggle that a student is having.
 11 It's still not perfect. We sometimes
 12 will find out after the fact that a student has been
 13 hospitalized for suicidal ideation or attempted
 14 suicide, and sometimes we still find that out by
 15 accident because the parents don't want that
 16 information shared.
 17 So it's still not a perfect system, but
 18 I do think it's been better. It's helped. I think
 19 we've gotten some kids some help and probably pushed a
 20 little harder on some threat assessment documentation
 21 on certainly a lot more kids than we had ever had
 22 before.
 23 **Q. And the flip side -- or one of the flip**
 24 **side concerns about having that level of open**
 25 **information sharing is that it would essentially deter**

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1 **kids from bringing concerns or issues to teachers or**
 2 **counselors. Have you seen any evidence that that has**
 3 **been a consequence of this new open or more open**
 4 **information sharing model?**
 5 A. No. I give our kids a lot of credit
 6 around -- and our teachers, but our kids in particular
 7 I think is what you're asking about. I don't think
 8 it's a deterrent at all. I think our kids really do
 9 care about keeping each other safe. I really believe
 10 that. And whether it's from self-harm or keeping a
 11 friend safe from another friend because of bullying or
 12 anything like that, we've had an increase in the
 13 number of reporting through not only our counselors
 14 and our teachers but also Safe2Tell. I didn't get
 15 Safe2Tell as an assistant principal. But as a
 16 principal in my first year, I don't -- I'd have to
 17 look at the documentation from the Safe2Tell company;
 18 but I don't remember hardly any. I believe we've had
 19 a lot more since, and we continue -- I've had three or
 20 four even in the past week. So I do think our kids
 21 are very open to doing whatever they can to keep our
 22 community safe.
 23 **Q. All right. And that leads to one of the**
 24 **subjects I definitely wanted to touch on, which is**
 25 **Safe2Tell. During the, I guess, year and a half that**

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1 **you had been principal prior to the shooting, you were**
 2 **getting Safe2Tell reports?**
 3 A. Yes. And most of them, in my mind,
 4 revolve around either somebody using drugs,
 5 potential -- they think they might be selling drugs,
 6 and a little bit around suicide. We had had a pretty
 7 open community conversation in 2009-2010 school year
 8 where we had a couple of kids that committed suicide.
 9 We did a lot of community outreach and training around
 10 suicide, so we talked about and learned about how
 11 important it is to talk about it and tell somebody if
 12 your friend is down and upset, that kind of thing. So
 13 suicide and drugs were what I primarily remember.
 14 **Q. And how many Safe2Tell calls were you**
 15 **getting in that year and a half prior to Claire's**
 16 **murder?**
 17 A. Honestly, I don't remember. Maybe a
 18 guess would be three times a semester maybe. I don't
 19 know. I've never called Safe2Tell to look at or
 20 pulled a report on that to look at that. The spring
 21 of 2014, we were getting them probably weekly, if not
 22 multiple times a week, in the -- just angst and
 23 nervousness that people had.
 24 **Q. All right. And has that increased**
 25 **prevalence of Safe2Tell calls at Arapahoe continued**

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1 **this school year?**
 2 A. Not as many as we had in the spring of
 3 2014. And I think last year they kind of leveled out
 4 a little bit, but we still get them. And I'm glad we
 5 get them, and I feel like we have a pretty good group
 6 of people that are on the response to the Safe2Tell
 7 with -- especially with having Guy Grace at the
 8 district level because they come in through e-mail,
 9 which is good but it's also bad if it's on a weekend
 10 and people aren't checking their work e-mail, you
 11 know, we might not see it in a super timely fashion.
 12 We also tell kids to call 911 because Safe2Tell --
 13 Safe2Tell is great. It's a wonderful resource for us.
 14 But it's not, in my opinion, the very best, fastest
 15 way to keep kids safe. I think if it's imminent and
 16 really -- they're really worried about someone harming
 17 someone else or themselves, 911 is a better way to go
 18 just because it does come in through the e-mail.
 19 **Q. All right.**
 20 A. But I do appreciate we have our
 21 department chair for guidance on there. I'm on there.
 22 My assistant principal, Brian Ceriani, who oversees
 23 safety and security now for our building is on there.
 24 Guy Grace is on there. Our SROs are on there. And so
 25 between the five of us that get the Safe2Tells, almost

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1 always one of us will catch it pretty darn quickly and
 2 can get on top of doing the research and the
 3 investigation around whatever it is.
 4 **Q. All right. Do I understand from what**
 5 **you said -- it's something I haven't heard before --**
 6 **is there a designated group who is responsible at**
 7 **Arapahoe High School for responding to Safe2Tell**
 8 **e-mails?**
 9 A. It's that group that I just named.
 10 **Q. Okay. And I just -- I hadn't heard of**
 11 **that group prior to today.**
 12 A. Yeah. Well, it has evolved a little
 13 bit. I'm just -- the piece that I feel really good
 14 about is having both district level overseeing it as
 15 well as the building level folks -- and I've spread it
 16 out as far as I think is possible -- to initially take
 17 those Safe2Tell reports. And then a counselor or
 18 myself may forward it to another counselor or another
 19 assistant principal because they know the student. We
 20 don't always get the students' names either, and
 21 that's very challenging. That's another problem with
 22 Safe2Tell because while we tell kids it is a safe way
 23 to report, it's -- you know, you are kept very
 24 anonymous, they're still afraid, I think, to put a
 25 friend's name on there or put the name of a student

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1 who might be doing drugs. They're afraid somehow it's
 2 going to come back to them.
 3 **Q. Okay. Does -- Well, strike that.**
 4 **What kind of training do the students at**
 5 **Arapahoe receive on Safe2Tell?**
 6 A. I wouldn't say it's explicit training on
 7 Safe2Tell, but we talk about it. So we talk about it.
 8 At the very beginning of the school year, we have
 9 all-class meetings with each grade level separately on
 10 the very first day of school and we talk very much
 11 about how we appreciate that they're eyes and ears on
 12 our campus. They're some of the most important
 13 resources that we have, to let someone know that if
 14 you see something that's -- you know, someone that
 15 doesn't belong, something that just doesn't feel
 16 right, some situation that doesn't quite just -- you
 17 might have a hunch, whatever it is, to let an adult
 18 know. And then that's where we talk about if you want
 19 to report anonymously, you all have the number. And
 20 we've added the number of Safe2Tell on the back of
 21 their student I.D. It's also linked to all of the
 22 district Web sites, including Arapahoe High School's.
 23 We also -- I'm kind of excited about
 24 this part. Last year, we were given some posters by
 25 the district to put up around our school on Safe2Tell;

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1 and we did. But they were kind of dark. They were
 2 black and white and a little bit -- they were not very
 3 student friendly. So we -- Brian Ceriani, who is in
 4 charge of safety and security his year, found -- his
 5 secretary, Jill DeBow, found some posters on the
 6 Safe2Tell Web site that are kind of, I don't know,
 7 more teenager friendly; and we have over 15 of those
 8 posted up around our school. They're in every
 9 guidance office. They are in every study room in the
 10 library. They are on all of the bulletin boards
 11 that are student community bulletin boards. There's
 12 one outside the main office. I mean, they're up in
 13 prominent places around the building.
 14 **Q. And are those changes that were made**
 15 **subsequent to the shooting?**
 16 A. Um-hum. Yeah.
 17 **Q. And that's -- obviously, one of the**
 18 **things we're looking at is what was in place prior to**
 19 **the shooting and what was changed subsequent to the**
 20 **shooting, and so let's break that down. One is --**
 21 A. So the Safe2Tell change --
 22 **Q. Well, yeah, let's break that down**
 23 **because I do want to talk about what changed with**
 24 **respect to the promotion of the Safe2Tell program**
 25 **after the shooting. But let's start with what was in**

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1 **place prior to the shooting because --**
 2 A. As far as kids telling on kids or
 3 telling of a concern or --
 4 **Q. Well, as far as the school or the**
 5 **district promoting Safe2Tell. As I understand it, the**
 6 **Safe2Tell information was not on student I.D.s in**
 7 **2013?**
 8 A. Un-un.
 9 **Q. It was not?**
 10 A. I don't think so. I think the first
 11 year we put it on the actual back of the I.D.s was
 12 '14.
 13 **Q. Okay. And --**
 14 A. But I think it was on our Web site still
 15 in '13.
 16 **Q. So it might have been on the Web site in**
 17 **2013?**
 18 A. I was just learning about Safe2Tell that
 19 year.
 20 **Q. Okay. And the reason I ask is,**
 21 **candidly, as you know, I had a daughter that went to**
 22 **high school with Claire. And Claire went there. I**
 23 **knew her as well. None of the kids I talked to in the**
 24 **aftermath of the shooting knew anything about**
 25 **Safe2Tell. Is that consistent with what you -- your**

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1 **impression in that time frame?**
 2 A. Yes. Safe2Tell was pretty -- that's why
 3 I said, even as an assistant principal, I'd get them
 4 once in a great while. I wouldn't get them, but I'd
 5 hear that we'd get a tip. Crime Stoppers, I think,
 6 was the place we went before; and there was a box
 7 outside the attendance office that was -- Crime
 8 Stoppers is all it said.
 9 **Q. That's the cartoon dog in a trench coat?**
 10 A. Yeah, yeah. Kind of the same thing,
 11 being able to report a tip, being able to find out --
 12 turn something in anonymously. It wasn't used very
 13 widely. It really wasn't. And so Safe2Tell became
 14 the way really. And we learned more about it, I
 15 believe -- again, I do believe it was on our Web site;
 16 but I'd have to ask -- Guy Grace would probably know
 17 that.
 18 **Q. Okay.**
 19 A. Certainly the IT folks would know that,
 20 if it was on the Web site. And then the following
 21 year, we put it -- easier again, an easier place. We
 22 had started all the suicide hotline, the LPS security,
 23 all of that kind of thing, but then we added the
 24 Safe2Tell as an easy way for kids to have access to
 25 that number.

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1 **Q. All right. And it sounds -- well,**
 2 **strike that.**
 3 **One of the other things, it sounds like,**
 4 **that changed after the shooting was the discussion of**
 5 **Safe2Tell at the grade level meetings at the beginning**
 6 **of every school year?**
 7 A. Specifically Safe2Tell, but we've
 8 always -- and this goes back to even my first days
 9 there as an assistant principal -- we've always talked
 10 to our kids and our staff about being -- they're the
 11 best eyes and ears on our campus. Let us know if
 12 something just doesn't feel right. You know, that
 13 kind of message has always been there. We've always
 14 welcomed and encouraged kids.
 15 In fact, most of the time when there'd
 16 be -- when we used to have a very -- I would say just
 17 not a great system for logging adult visitors into the
 18 building, kids would come up and find us in the
 19 cafeteria and say, hey, that guy over there, I don't
 20 know why he's here but he doesn't look like he
 21 belongs. And then we'd go find them. Kids have
 22 always been great about coming up and letting us know
 23 things, but it's definitely gotten better. We've
 24 encouraged much more use of Safe2Tell as one way, but
 25 we -- again, Safe2Tell comes through an e-mail. It

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1 takes time. So we still -- I still want kids to be
 2 coming to us immediately.
 3 **Q. All right. Any other changes that the**
 4 **school has made with respect to the promotion or the**
 5 **training or increased visibility on Safe2Tell since**
 6 **the shooting, or have you told me all the improvements**
 7 **that have been made in that regard?**
 8 A. We put it in the newsletter. I think
 9 I've covered the majority of ways.
 10 **Q. Okay.**
 11 A. And I want to add too, Safe2Tell changed
 12 their format recently, at least since this school year
 13 has started; and I appreciate what they've done with
 14 it because there's an ongoing dialogue that you can
 15 see now. All it used to say was tipster said X, Y, Z.
 16 And then we could go in and put in our response or
 17 our -- what we're doing, we're investigating or we've
 18 investigated; but we never got to have a dialogue.
 19 So now we can ask for more -- we can see
 20 what the dialogue is between anyone that's responded,
 21 and we can ask for -- for example, I'll give you one
 22 that we just had. Someone wrote in saying that there
 23 was -- there are students that are smoking marijuana
 24 across the street in the King Soopers parking lot
 25 before school. And we were able to go back in, both

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1 myself separately from the SRO, and say if there's any
 2 way you can give us names, we can look into that from
 3 the school side. And then patrol would say we'll put
 4 an extra car out in that parking lot and whatnot, but
 5 we can see the dialogue now. So I think they're
 6 trying to improve that process a bit from their side
 7 as well.
 8 **Q. Got it. Okay. And you said it's your**
 9 **understanding that there's about 15 posters in**
 10 **Arapahoe promoting Safe2Tell?**
 11 A. Um-hum.
 12 **Q. Okay. And the reason I ask that is, as**
 13 **you know, we all went out to the school in October and**
 14 **we only saw a couple.**
 15 A. Well, and some of them are in, as I
 16 mentioned -- like in all of the quiet study rooms in
 17 the library, there's one in each of those rooms.
 18 There's one in each guidance counselor -- I don't know
 19 where you --
 20 **Q. So it's entirely possible we just didn't**
 21 **see them all?**
 22 A. Correct. We don't have a lot of
 23 bulletin boards at Arapahoe, and we try to keep our
 24 things on the bulletin boards as far as displaying
 25 things for students; so they're on the student

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1 bulletin boards, and so I'm not sure -- yeah, I don't
 2 know which ones you saw or didn't see.
 3 **Q. Understood. You mentioned that Brian**
 4 **Ceriani is now in charge of security and safety at the**
 5 **school. When did that change occur?**
 6 A. When Kevin Kolasa moved to Euclid Middle
 7 School and got the job as an assistant principal
 8 there, we needed to hire another assistant principal.
 9 Initially, I had kind of kept my mind open to let's
 10 hire the best assistant principal out of the pile and
 11 then -- pile meaning -- that's really a pile of
 12 applications.
 13 **Q. A stack of resumes, yeah.**
 14 A. Yes, you understand. The pool of
 15 applicants, if you will. Hire the best person, the
 16 best fit for our team and then let's fit the needs
 17 around that as we form our new team. And we hired
 18 Brian, and he has actually some experience as a police
 19 officer and as a former guidance counselor at the
 20 high school and middle school level. And when we met
 21 him and got to know him even better, thought he is a
 22 much better fit for that role than Darrell Meredith,
 23 who really is a better fit for the job that Kevin was
 24 vacating. So it really worked out perfectly for both
 25 of them and for Arapahoe, in general, to move Darrell

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1 into an area where he wanted to be. He has been a
 2 teacher at Arapahoe; and when I first became
 3 principal, I had put Kevin in that position. He used
 4 to be in the student activities role. And I moved
 5 Kevin over to curriculum and instruction, not wanting
 6 to move Darrell away from building and safety and
 7 security because he had been doing that for a while;
 8 and that's a tough position to -- just having both the
 9 building and the custodians and the safety and
 10 security is -- it takes a while to get that learned
 11 and those responsibilities, and he had a good
 12 relationship and good rapport with both of those
 13 groups of people. So I left Darrell where he was,
 14 moved Kevin over in curriculum and instruction. So
 15 when Kevin left and then we met Brian, it was perfect.

16 **Q. Okay.**
 17 A. And I still think Brian is in a perfect
 18 position.

19 **Q. Well, and one of the questions I have on**
 20 **that is, was the decision to move Brian Ceriani into**
 21 **security and Darrell Meredith out of his safety and**
 22 **security responsibilities in any way motivated by any**
 23 **dissatisfaction that you or the district had with how**
 24 **Darrell performed that function?**
 25 A. No, no, no. Like I said, I actually

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1 chose to keep him there my first year because I had to
 2 hire one assistant principal because I vacated an
 3 assistant principal's office; and so I chose to keep
 4 Darrell there because of his experience and had done a
 5 good job in that role.

6 **Q. All right. Let's take a look -- we're**
 7 **still on Exhibit 1.**
 8 A. Okay.

9 **Q. Take a look at page 61, which talks**
 10 **about use of the Internet on school property. Are you**
 11 **familiar with this policy? It's actually 61 and 62.**
 12 A. Okay.

13 **Q. And you'll see down towards the, I don't**
 14 **know, last third of the page on page 61, there's a**
 15 **discussion of the fact that student use of the**
 16 **district Internet system is a privilege, not a right.**
 17 **Do you see that?**
 18 A. Um-hum.

19 **Q. It goes on to say that students can be**
 20 **disciplined, including being suspended or expelled,**
 21 **for misuse of the Internet on school property; right?**
 22 A. Um-hum.

23 **Q. You were familiar with that policy back**
 24 **in 2013?**
 25 A. Um-hum.

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1 **Q. Has the -- under your tenure, do you**
 2 **know, has the school ever suspended or expelled a**
 3 **student for inappropriate use of the district**
 4 **Internet?**
 5 A. Yes.

6 **Q. Okay.**
 7 A. I don't remember exactly the situation
 8 around it, but that's been -- yes.

9 **Q. Okay. But it was certainly -- it was a**
 10 **resource or a tool that you knew the school had**
 11 **available back in 2013?**
 12 A. Yes.

13 **Q. Okay. And you'll see on page 62 there's**
 14 **a discussion of what -- some examples of what might be**
 15 **inappropriate -- considered inappropriate uses of the**
 16 **district's Internet system, right?**
 17 A. Um-hum.

18 **Q. And in the middle of the page, one of**
 19 **them is to transmit or receive threatening**
 20 **information; right?**
 21 A. Um-hum.

22 **Q. Another is to -- another inappropriate**
 23 **use would be to access, review, upload, download,**
 24 **store, print, post, or distribute materials that are**
 25 **inappropriate in the educational setting or disruptive**

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1 **to the educational process?**
 2 A. Where is that one?
 3 **Q. It's right --**
 4 A. It's very redundant because that's the
 5 same thing here.

6 **Q. I know. It's right here.**
 7 A. Okay.

8 **Q. It talks about information that would be**
 9 **disruptive to the educational process. And there's**
 10 **another one right below that that talks about that**
 11 **it's inappropriate to access, review materials that**
 12 **use language or images that advocate violence. Do you**
 13 **see that?**
 14 A. Um-hum.

15 **Q. Again, those would all be violations of**
 16 **the student code of conduct?**
 17 A. Right.

18 **Q. That could lead to --**
 19 A. They could be, yes.

20 **Q. Right. And they could lead to**
 21 **discipline?**
 22 A. Yes, could.

23 **Q. And you now know that in the fall of**
 24 **2013 Karl Pierson was observed looking at guns on his**
 25 **laptop in the cafeteria?**

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1 A. I don't know the specifics around it.
 2 I've heard that. He was either looking at them and
 3 someone saw him or he was looking at them and they
 4 think they saw it through a video camera. That's what
 5 I've heard. I did not know that in the fall of 2013.
 6 **Q. And I understand that.**
 7 A. I know -- I only heard about that.
 8 **Q. Well, have you heard that one of the**
 9 **things that Karl was looking at was scenes of other**
 10 **school shootings like Sandy Hook?**
 11 A. This is the first time I've heard that.
 12 **Q. Okay.**
 13 A. The only thing I had heard was that he
 14 was looking at guns.
 15 **Q. Okay. Well, and I ask that because the**
 16 **campus security officers, in particular, Christine**
 17 **Kolk, told the Arapahoe County sheriff's investigators**
 18 **that she saw Karl looking not just at guns in the**
 19 **cafeteria but at scenes of other school shootings in**
 20 **the fall of 2013.**
 21 A. This is the very first I've heard that.
 22 **Q. Okay. Would you agree with me that**
 23 **looking at scenes of school shootings in the school**
 24 **cafeteria would be a violation of this policy?**
 25 A. Absolutely.

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1 **Q. And should have gotten some attention**
 2 **from somebody --**
 3 A. Yes.
 4 **Q. -- when it happened?**
 5 A. Yes.
 6 **Q. And same with Karl Pierson, who had just**
 7 **been the subject of a threat assessment, looking at**
 8 **guns in the cafeteria, that would be, in that context,**
 9 **a violation of this policy as well; wouldn't it?**
 10 A. Yes.
 11 **Q. And should have gotten some attention**
 12 **from school administration; wouldn't you agree?**
 13 A. Yes.
 14 **Q. When and how did you first hear that**
 15 **Karl Pierson had been observed looking at guns on his**
 16 **tablet or laptop in the cafeteria?**
 17 A. I remember it was late at night. I was
 18 at home and looking at e-mails, and I got an e-mail
 19 from Cameron Rust; and I don't know if Cameron sent it
 20 to me directly or if he -- I don't remember if Cameron
 21 sent it to me directly or he sent it to Scott Murphy
 22 who then sent it to me. And in there, it said that he
 23 was looking at guns somewhere in there. It was very
 24 lengthy. I can't remember. He liked to write long
 25 things.

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1 **Q. Okay.**
 2 A. That was the very first time I heard
 3 about it.
 4 **Q. Okay. And when you first -- and this,**
 5 **obviously, was in the days or weeks immediately**
 6 **following Claire's death?**
 7 A. Oh, it was either the -- no, not her
 8 death. She was still alive. It was that day or the
 9 day after.
 10 **Q. Okay.**
 11 A. It was right at the beginning of it all.
 12 **Q. Okay. And when you --**
 13 A. You probably have all my e-mails. You
 14 could check when it happened, but that's when I found
 15 out.
 16 **Q. Okay. And when you found out via this**
 17 **e-mail that Cameron had written about Karl looking at**
 18 **guns, what was your reaction?**
 19 A. I was concerned. That concerned me.
 20 **Q. All right. And what did you do?**
 21 A. I asked my assistant principals who
 22 knew. I asked Kevin if he knew, specifically Kevin
 23 because Kevin had worked with Karl the most, and he
 24 did not.
 25 **Q. All right.**

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1 A. And Darrell said it was him that knew,
 2 not that night. He didn't -- we didn't -- I remember
 3 talking with them at school and Darrell being the one
 4 that said he was told about it by campus supervisors.
 5 And I don't remember if it was Christina or Cameron.
 6 **Q. And when Darrell told you that he knew**
 7 **about this incident of Karl looking at guns in the**
 8 **cafeteria, what did the two of you say?**
 9 A. I just asked him why he never told
 10 anyone. Why didn't you let us know? Why didn't Kevin
 11 know? And he said he didn't think it was that bad.
 12 **Q. This was Darrell telling you this?**
 13 A. Yes. It goes back to that vortex of
 14 information on a kid. I think Darrell knew some
 15 things about Karl and Kevin knew some things about
 16 Karl and never did it all come together.
 17 **Q. Well, Darrell knew that Karl had just**
 18 **been the subject of a threat assessment; right?**
 19 A. Well, it would have been in September;
 20 right?
 21 **Q. Right. Was the threat assessment.**
 22 A. When did he look at the guns? When was
 23 that allegedly --
 24 **Q. My understanding was that was in**
 25 **October.**

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1 A. So I don't know.

2 **Q. But my question is focused on your**

3 **discussions with Darrell Meredith when it became clear**

4 **that he had, in fact, been told about Karl looking at**

5 **guns.**

6 A. I had just asked him why he didn't

7 share, and he -- he didn't feel -- at the time, he

8 didn't think it was that important. He didn't feel it

9 was a violation of this rule. I remember him talking

10 about that.

11 **Q. Did you discuss this policy during that**

12 **conversation?**

13 A. We didn't get it out and look at it, but

14 we did -- he did, you know, say teenage boys look at

15 guns. I mean, that's something that happens. It

16 could have been for a research project for a class.

17 He didn't know the reason. And I think that's why

18 he -- how he dismissed it at the security meeting.

19 But I wasn't at the security meeting, so I'm just

20 going off of what I remember Darrell telling our admin

21 team about it.

22 **Q. Okay. What else can you tell me about**

23 **what Darrell told the admin team in this discussion**

24 **about Karl looking at that?**

25 A. That was about it. It wasn't -- I don't

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1 remember it being a lengthy part of the conversation.

2 That's all I remember.

3 **Q. Did it cause you concern that the**

4 **assistant principal in charge of security didn't**

5 **report that incident to you or to the grade level**

6 **assistant principal for the student who was observed**

7 **looking at the guns?**

8 A. It certainly does now. I think at --

9 this is what's so difficult, I think, about this whole

10 thing is just remembering how -- how -- what was life

11 like at Arapahoe in October of 2013, you know, Karl's

12 threat assessment coming out low level, feeling -- and

13 I'm sure that's something we'll get to -- but feeling

14 pretty confident that it was being handled, and it

15 wasn't -- it wasn't what it is now. So taking --

16 trying to put myself -- think about what Darrell's

17 mindset was, what was his frame of thinking at that

18 time, trying to accept his answer for he did what he

19 thought was right. And he may have --

20 **Q. Well, what he did was nothing.**

21 A. Nothing. And he may have intended to

22 tell Kevin and the days happen. I don't know. I wish

23 he would have.

24 **Q. And I understand that, and I'm not**

25 **asking you to speculate about what was in Darrell's**

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1 **mind. I'm asking about what was in your mind when you**

2 **heard --**

3 A. I wish he would have.

4 **Q. -- with a student laying in the hospital**

5 **and another one laying in the morgue --**

6 A. Yeah, I wish we would have known.

7 **Q. Why didn't you say anything? What was**

8 **in your mindset? Were you concerned?**

9 A. Yeah. And I asked him. That's all --

10 and all I could take was his answer. Yeah.

11 **Q. Okay. Now, in the student handbook,**

12 **there's also a discussion -- actually, I think this is**

13 **in the daily planner.**

14 A. Yeah, that's the student handbook. Is

15 that No. 2 or is that part of 1?

16 **Q. Actually, just an excerpt of it is**

17 **No. 2.**

18 A. No. 2, okay.

19 **Q. And there's a discussion about the fact**

20 **that the school has the right to search essentially**

21 **anything a student brings onto campus, right?**

22 A. Right.

23 **Q. Search their backpack, the locker, the**

24 **car, pockets, computers, phones, tablets?**

25 A. Um-hum.

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1 **Q. Right? The school can search all of**

2 **those with reasonable suspicion?**

3 A. Yes.

4 **Q. Have I got that right?**

5 A. Yes, that's my understanding.

6 **Q. Okay.**

7 A. Always has been.

8 **Q. And mine as well. So my question is:**

9 **Does the school -- or did the school in the fall of**

10 **2013 have any policy or criteria on when it would**

11 **perform those types of searches as part of threat**

12 **assessments or disciplinary proceedings?**

13 A. I'm trying to put myself back there.

14 Yes, because I can think of times where I performed

15 searches even as an assistant principal. Specifically

16 around electronics?

17 **Q. Yeah.**

18 A. So I can remember incidents of selling

19 drugs, asking students -- you know, showing them,

20 look, we do have the right. Because they initially,

21 you can't look at my phone. You can't look at my

22 phone. Yes, I can. I have reasonable suspicion.

23 It's been reported that you might be selling drugs,

24 getting them to -- they sit there with me and we look

25 at their phone. Sometimes -- most often, it would

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1 show something. So that's an example.
 2 Bullying other kids, we had one just
 3 last spring that had some threatening text messages
 4 sent on a student that was actually taken to a
 5 district level threat assessment for comments made on
 6 there. So those are some situations where we
 7 absolutely would and have. Those are some specific
 8 examples of where we have searched students' personal
 9 electronic devices.
 10 Now, lately, it's been a little bit of a
 11 caution for us because of the sexting and the
 12 pornographic things that kids are sending. So that's
 13 been -- we've been a little bit hesitant around taking
 14 a phone and searching it just for those reasons, but
 15 we'll still do it if we need to and certainly around a
 16 threat.
 17 **Q. Okay. And the reason I ask is we know**
 18 **that there were no searches performed in connection**
 19 **with any disciplinary or threat assessment proceedings**
 20 **that related to Karl Pierson back in the fall of 2013,**
 21 **right?**
 22 A. Right. That's my understanding.
 23 **Q. And my question is, should there have**
 24 **been given the reasonable suspicion criteria that**
 25 **applied to the school's right to search essentially**

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1 **anything he brought onto school property?**
 2 A. I can answer that by saying I wish we
 3 would have.
 4 **Q. And I understand that. But my question**
 5 **is, should there have been one done, some kind of**
 6 **search at some point in time?**
 7 A. I don't know. I don't know that I could
 8 say Karl really violated the policy. We don't say
 9 kids can't look at guns. We don't know -- I don't
 10 know why he was looking at guns. I don't know that
 11 anybody ever knew. I certainly never heard anything
 12 about Sandy Hook or school shootings. That piece,
 13 absolutely we should have been searching.
 14 **Q. Okay. Well, and given the context that**
 15 **Karl had just been the subject of a threat assessment**
 16 **for threatening to kill a teacher a few weeks earlier,**
 17 **wouldn't that have, in your mind -- or shouldn't that**
 18 **have, in your mind, triggered some search or some**
 19 **further investigation of what he was doing in October**
 20 **of 2013?**
 21 A. Yes. Yeah, I think you asked me that
 22 already; and yes, I mean, I don't disagree with that.
 23 That was definitely something that when I heard about
 24 it, I was concerned.
 25 MR. ROCHE: We've been going about an

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1 hour and a half. Why don't we go ahead and take a few
 2 minutes.
 3 THE DEPONENT: Okay.
 4 (Recess taken, 10:24 a.m. to 10:42 a.m.)
 5 **Q. (BY MR. ROCHE) Okay. Before the break,**
 6 **we were talking about Christina Kolk's statement that**
 7 **she had seen Karl Pierson looking at guns and scenes**
 8 **of mass shootings; and I wanted to -- you mentioned**
 9 **that that was not something you had heard before?**
 10 A. Un-un.
 11 **Q. So I just want to show you where that**
 12 **comes from, and I think it's in this book,**
 13 **specifically at Exhibit 28. That's how I've got it**
 14 **marked, but that doesn't look like it. Oh, yeah, that**
 15 **is it. Go to the page that's marked 980.**
 16 A. One of these?
 17 **Q. Yeah. I must have it marked wrong. I**
 18 **apologize. I'm sorry. Look at Exhibit 29, if you**
 19 **would, the next one. Well, I've got it marked wrong.**
 20 **I apologize.**
 21 A. What's the number you're looking for, 9
 22 what?
 23 **Q. Page 980.**
 24 MR. EVERALL: Which exhibit are we on?
 25 MR. ROCHE: That's what we're trying to

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1 figure out. We're going off my handwritten notes.
 2 **Q. (BY MR. ROCHE) That's all right. We'll**
 3 **sub this in as an exhibit.**
 4 A. I found 980. 1980?
 5 **Q. No. That's all right. We'll come back**
 6 **to that. Let's look at a new exhibit.**
 7 MR. ROCHE: I forget what number we're
 8 up to, 49 or 50.
 9 THE REPORTER: 49.
 10 MR. ROCHE: Let's also mark this as
 11 Exhibit 50.
 12 (Deposition Exhibits 49 and 50 were
 13 marked.)
 14 **Q. (BY MR. ROCHE) Do you recognize**
 15 **Exhibits 49 and 50 as the Arapahoe High School Student**
 16 **Planner/Handbook for the 2013-2014 and then 2014-2015**
 17 **school years?**
 18 A. Yes.
 19 **Q. I wanted to ask you about one section of**
 20 **these handbooks. Well, first, who writes these?**
 21 A. The administrative team.
 22 **Q. All right. And are you, obviously, a**
 23 **part of that?**
 24 A. Yes.
 25 **Q. Who gives the final okay to the**

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1 **revisions that are made to the student handbook every**
 2 **year?**
 3 A. I do.
 4 **Q. And is it something that you do in**
 5 **consultation with district level administration as**
 6 **well?**
 7 A. On some things, yes.
 8 **Q. All right. Well, then let me direct**
 9 **your attention to page -- on Exhibit 49, page 1654.**
 10 **And there's a poem that was written by, what looks**
 11 **like, an Arapahoe alum; right?**
 12 A. Yes.
 13 **Q. And then below that, there's a paragraph**
 14 **that talks about the welfare and safety of every**
 15 **warrior. Do you see that?**
 16 A. Um-hum.
 17 **Q. At the end of that paragraph, it reads,**
 18 **"We know that we need to do more regarding team**
 19 **suicide prevention than we had previously done";**
 20 **right?**
 21 A. Um-hum.
 22 **Q. And if you compare that --**
 23 MR. EVERALL: You have to answer yes or
 24 no.
 25 A. Sorry. Yes.

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1 **Q. (BY MR. ROCHE) Okay. Now, compare**
 2 **that, if you would, to Exhibit 50, which is the next**
 3 **school year and then specifically to page 1692. Do**
 4 **you see that?**
 5 A. Yes.
 6 **Q. And it appears to be essentially the**
 7 **same section of the student handbook, doesn't it?**
 8 A. Yes.
 9 **Q. And you'll see at the top of page 1692**
 10 **there's the same paragraph about the faculty and staff**
 11 **caring about the welfare and safety of every warrior,**
 12 **right?**
 13 A. Yes.
 14 **Q. But the sentence, "We know that we need**
 15 **to do more regarding teen suicide prevention than we**
 16 **had previously done" has been deleted; right?**
 17 A. Yes.
 18 **Q. My question is, why was that deleted and**
 19 **who suggested that that sentence be removed?**
 20 A. I don't remember, honestly.
 21 **Q. Were you aware before just now that that**
 22 **sentence had been removed from the student handbook?**
 23 A. I'm sure I was. I don't recall why. I
 24 feel the information on giving kids resources for
 25 suicide prevention is still there, and that may have

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1 been my thinking on taking that last part out. We do
 2 a lot with it.
 3 **Q. Well, I guess my question is, who took**
 4 **it out? Was it you or was it somebody else?**
 5 A. Probably was me. Honestly, I don't
 6 remember if someone recommended I take it out.
 7 **Q. Okay. Do you recall any discussions**
 8 **about removing that sentence?**
 9 A. No.
 10 **Q. Do you recall, setting aside the**
 11 **language, was there any change adopted or implemented**
 12 **at Arapahoe in terms of what the school was doing**
 13 **regarding teen suicide prevention?**
 14 A. What do you mean?
 15 **Q. Well, did anything substantive change**
 16 **when this sentence was removed?**
 17 A. No.
 18 **Q. Did you stop doing something that you**
 19 **had been doing?**
 20 A. No.
 21 **Q. Or start doing something differently**
 22 **from the way you had been doing it?**
 23 A. No.
 24 **Q. So it was just a removal of the sentence**
 25 **from the handbook but not a substantive change on how**

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1 **the school was addressing that issue?**
 2 A. No.
 3 **Q. Okay. This is going to be a very broad**
 4 **question, and I want you to answer it as best you can**
 5 **and we'll, obviously, drill down into it. But I want**
 6 **to get a sense of, as the principal of Arapahoe, what**
 7 **is your overall philosophy with respect to student**
 8 **discipline?**
 9 A. Overall, every student discipline
 10 situation is treated -- should be treated with regard
 11 to each individual situation. I would add
 12 additionally students -- I expect that students are
 13 treated fairly and with respect to their dignity and
 14 realize that not every single situation may have the
 15 exact same outcome. I also believe that we have
 16 always and I continue to have high expectation for
 17 student behavior at Arapahoe High School.
 18 **Q. All right. And do you agree that some**
 19 **level of consistency in disciplinary -- in discipline**
 20 **of students is important?**
 21 A. Some level, yes, yes.
 22 **Q. Okay. And one of the reasons that I'm**
 23 **asking about this is I've obviously seen some**
 24 **disciplinary records, not by any means all of the**
 25 **school's disciplinary records. But in Karl Pierson's**

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1 case, he was suspended for yelling "fuck" in a
 2 classroom but not for threatening to kill a teacher;
 3 and that seems incongruous to me. So help me
 4 understand how those two outcomes can exist in one
 5 case.
 6 A. Karl was kept out of school for three
 7 days. Kevin did not enter it as a suspension, but the
 8 keeping him out of school for three days served the
 9 same purpose as a suspension would have. Kevin asked
 10 me -- which is giving him time to investigate, getting
 11 Karl away from the alleged victim, and additionally
 12 asking his mom to get him seen by a mental health
 13 provider outside of the school.
 14 Q. Those were the purposes of holding Karl
 15 out?
 16 A. The main purpose of having a suspension
 17 or holding a student out of school in a situation like
 18 this. Kevin asked me if I would support him not
 19 calling it a suspension to give Karl a break. He had
 20 just -- to give the kid a break.
 21 Q. Okay. And that's what I wanted to get
 22 at is the purpose of not suspending Karl was to keep
 23 it off his disciplinary record but to still get him
 24 out of school for a period of time?
 25 A. Yeah. And I don't care that it would

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1 have been on his discipline record, but I think Karl
 2 for preparation for school and feeling demoted as
 3 captain and just for him, to give him a break.
 4 Q. Okay. And tell me about your
 5 conversation with Kevin Kolasa about the decision not
 6 to suspend Karl Pierson in September of 2013.
 7 A. That was about it. He asked if I would
 8 support it being an excused absence per mom and Kevin.
 9 She was going to get him psychological help, make sure
 10 that some other expert in mental health felt that he
 11 was safe to return to school, and Kevin would initiate
 12 the threat assessment paperwork with Dr. Song.
 13 Q. All right. Do you recall as part of
 14 that conversation with Kevin Kolasa whether he had
 15 gotten Mrs. Pierson's agreement to share with the
 16 school whatever the outcome was of the assessment that
 17 she said she was taking Karl to get?
 18 A. The day that he asked me about
 19 suspending?
 20 Q. At any time.
 21 A. No, I don't. I know that -- no, I
 22 don't. I don't recall that, no.
 23 Q. And what I'm trying to get at there is,
 24 hearing from another mental health professional that
 25 Karl Pierson was safe to return to school is one

75

1 thing, but hearing from his mother that some mental
 2 health professional said he was okay to return to
 3 school is something entirely different; wouldn't you
 4 agree?
 5 A. Yes, but I don't know how -- because I
 6 wasn't in that meeting when they completed that
 7 paperwork, I'm not sure how that information got to
 8 Kevin.
 9 Q. And that's what I'm asking you is do you
 10 know how that information got to Kevin?
 11 A. I don't.
 12 Q. Did you ask Kevin whether or not he was
 13 going to get that information directly from the
 14 outside mental health professional or just from the
 15 mother?
 16 A. I did not.
 17 Q. Prior to the fall of 2013, did you know
 18 Karl Pierson?
 19 A. I did not.
 20 Q. Had you ever talked to him?
 21 A. Never. I had never spoke with Karl
 22 Pierson.
 23 Q. What about his parents?
 24 A. No.
 25 Q. What about Claire?

76

1 A. No.
 2 Q. And you hadn't talked to, as I
 3 understand, Mike or Desiree prior to Claire's
 4 shooting?
 5 A. No.
 6 Q. Okay. So how did Karl first come to
 7 your attention?
 8 A. Sorry. I just remember hearing he was
 9 good at speech and debate and qualified for nationals.
 10 That's what I knew about Karl Pierson the spring
 11 prior, spring of 2013 -- I guess it would be his
 12 junior year -- and asking if it was okay if he went to
 13 nationals because they tried to make me aware of those
 14 trips with our CTE organizations, our speech and
 15 debate.
 16 Q. All right. Was he -- did you know
 17 anything else about him prior to the start of the fall
 18 semester in 2013?
 19 A. I did not.
 20 Q. Would you have even recognized him
 21 walking through the --
 22 A. I would not.
 23 Q. So the first -- is it fair to say that
 24 the first time Karl got on your radar was when he
 25 threatened to kill Tracy Murphy?

77

1 A. Yeah. Yes.

2 **Q. Okay. Did you know when that incident**

3 **occurred that he had previously been suspended for an**

4 **outburst in a classroom?**

5 A. I may have known that. I don't remember

6 specifically. I don't remember everybody that's

7 suspended.

8 **Q. And I understand. There's plenty of**

9 **suspensions at a school of 2000 kids in a given year,**

10 **and a one-day suspension for cursing in a classroom is**

11 **probably not something that in isolation is a big red**

12 **flag. So in fairness, I do get that.**

13 A. So, no, I didn't remember that at the

14 time.

15 **Q. So let's jump ahead to the fall of 2013.**

16 **What is the first conversation you remember with**

17 **anybody about Karl Pierson in the fall of 2013?**

18 A. Honestly, I don't remember if it was

19 Bryan Jesse, the assistant principal for activities,

20 who would have overseen speech and debate, or Kevin

21 Kolasa as Karl's administrator. One of them talked to

22 me, and maybe both of them together, about whether or

23 not I would support Tracy Murphy's decision not to let

24 Karl be a captain was the first conversation I

25 remember.

78

1 **Q. And with respect to the timing of that**

2 **conversation, was that before Tracy Murphy made the**

3 **decision or communicated to Karl Pierson and his**

4 **mother that he was being removed as captain?**

5 A. Yes.

6 **Q. All right. And what did either**

7 **Mr. Jesse or Mr. Kolasa tell you about the reasoning**

8 **behind Tracy Murphy's desire to remove Karl as a**

9 **captain?**

10 A. I only remember generally that he

11 didn't -- Tracy Murphy did not believe Karl was a good

12 representation of his speech and debate team based on

13 actions and behaviors. Specifically, I do not know.

14 **Q. Okay. And what was your response to**

15 **Bryan or Kevin?**

16 A. I would have completely supported

17 Tracy's decision for whomever he would like to name as

18 captain of his team. Just like we do with all of our

19 athletic teams, coaches have final decision and say

20 over their captains.

21 **Q. Did you have a conversation with Tracy**

22 **Murphy about his decision to remove Karl as captain**

23 **before that decision was communicated to Karl Pierson**

24 **and his mother?**

25 A. Not with Tracy directly.

79

1 **Q. Okay. When did you first discuss Karl**

2 **Pierson with Tracy Murphy?**

3 A. The day Tracy demoted Karl, he -- Tracy

4 came into my office to ask me -- I think that was the

5 first time directly -- to ask me, Are you sure you

6 support my decision because I just did it and Karl was

7 pretty upset when he left and made some sort of

8 comment about Pramenko won't let you do this or

9 something like that. And I said, Of course I will

10 support you, Tracy. It wasn't a very long

11 conversation, but definitely one of reassurance

12 towards Tracy in supporting his decision no matter how

13 unhappy Karl may be about it.

14 **Q. Sure. And that was -- as I understand**

15 **it, that was Tuesday afternoon that you had that**

16 **conversation with Tracy?**

17 A. Yes, that sounds right.

18 **Q. And Tracy told you that Karl thought you**

19 **were going to be unhappy with that decision?**

20 A. That's what Tracy told me, yes.

21 **Q. Yes. And, obviously, you weren't**

22 **unhappy with that decision?**

23 A. No.

24 **Q. And what Tracy Murphy told me was that,**

25 **among other things, you said about Karl, what an ass**

80

1 **for even thinking that I would support him over one of**

2 **your faculty members?**

3 A. Right. I might have said that. I don't

4 recall cussing at him, but that's pretty arrogant of a

5 student to say to a teacher.

6 **Q. Exactly.**

7 A. That would have been my feeling.

8 **Q. Sure. Totally understandable. And my**

9 **question is, did it raise any flags in your mind that**

10 **Karl was so arrogant or narcissistic to even think**

11 **that you would support him over one of your faculty**

12 **members on a decision like that?**

13 A. Not really. Teenagers sometimes say

14 things and do things that are -- I don't know. I

15 would call it -- I don't know if narcissistic is the

16 right word, but it did not. It did not raise any red

17 flags for me.

18 **Q. And at that point, you had not heard**

19 **about the threat that Karl had made?**

20 A. No.

21 **Q. At that point during that Tuesday**

22 **afternoon conversation with Tracy Murphy, did he**

23 **express to you any concerns he had about Karl or fear**

24 **that he had of Karl?**

25 A. No. No, he -- it seemed to me -- what I

81

1 remember from the conversation was he was just seeking
 2 my support of his decision.
 3 **Q. All right. And he, in some respects,**
 4 **described it as sort of a CYA, hey, you might get a**
 5 **call from this mom?**
 6 A. That's how it felt, yeah. Not fearful,
 7 not -- kind of FYI. And I'm not sure, but Kevin may
 8 have probably already left for the day. That might be
 9 why he came to me, although he also said my name. So
 10 I don't know.
 11 **Q. What was your next conversation or**
 12 **interaction with anybody concerning Karl Pierson?**
 13 A. The next day we had a faculty meeting;
 14 and I don't think anything came up throughout the day
 15 about him until after school, after the faculty
 16 meeting. I remember being in the cafeteria. We meet
 17 in the forum; and I had been kind of trying to hurry
 18 because I was going to be late for the calendar
 19 committee meeting, my first district committee meeting
 20 as a principal, and kind of rushing back to grab my
 21 stuff. And Mark Loptien and Tracy Murphy asked to see
 22 me in the cafeteria, so I stopped. And that's when
 23 Mark shared with me what he heard Karl say and that he
 24 was not sure if he meant anything by it; but the
 25 longer he thought about it, the more he thought he'd

82

1 better just let somebody know.
 2 And at that point, I -- I don't know if
 3 we walked over to Kevin or I called Kevin over. But I
 4 said, You need to tell Kevin everything; and then I
 5 left. That was the next conversation that I had about
 6 Karl.
 7 **Q. All right. During your conversation**
 8 **with Mark Loptien and Tracy Murphy about the threat**
 9 **that Karl Pierson had made against Tracy Murphy, did**
 10 **either of them describe to you how Karl was behaving?**
 11 **Was he screaming, yelling, talking, waving his arms,**
 12 **anything like that?**
 13 A. No. Mark just said it was -- like I
 14 said, he initially wasn't going to do anything with it
 15 because he didn't name a name. He said, I'm going to
 16 kill that guy; but he was -- he yelled it really loud.
 17 And the more Mark had thought about it -- and I'm not
 18 sure how he ever connected it to Tracy. I don't know
 19 what their interaction was. But he just said he
 20 yelled it. And the more Mark thought about it, the
 21 more he thought he needed to tell somebody. That's
 22 what I remember about the conversation with Mark and
 23 Tracy.
 24 **Q. All right. And to the best of your**
 25 **recollection, you brought Kevin Kolasa over to that**

83

1 **conversation?**
 2 A. Or we went over to him. I just remember
 3 it all kind of happening in the cafeteria pretty
 4 quickly.
 5 **Q. All right. And what did you tell Kevin**
 6 **to do other than get, essentially, repeated what was**
 7 **previously told to you?**
 8 A. Well, get it repeated and then
 9 definitely to get Esther Song involved because it was
 10 a threatening statement, but also to contact parents.
 11 And that's probably about it. At that point, that's
 12 what I remember.
 13 **Q. So --**
 14 A. And getting Esther involved because we
 15 knew we would have to do a -- threat assessments were
 16 fairly new to us still. It's not something that we
 17 did on a regular basis, but I knew -- I knew enough
 18 about them that this was something we needed to do.
 19 **Q. And that's what I'm getting at. Did you**
 20 **tell Kevin, You need to do a threat assessment on this**
 21 **kid?**
 22 A. Yeah, I probably told Kevin to make sure
 23 Esther does it because in my -- my experience at that
 24 point was she was the expert trained. She was the one
 25 that would lead that process, a mental health expert.

84

1 **Q. All right.**
 2 A. And not -- I did not know that Kevin had
 3 not had training at that point, but I still would
 4 have -- I would still not do a threat assessment
 5 process without a mental health psychologist there.
 6 **Q. Sure. Have you heard that Tracy Murphy**
 7 **was disappointed that you didn't handle this threat**
 8 **personally rather than handing it off to Kevin Kolasa?**
 9 A. Tracy told me that.
 10 **Q. Okay. Well, why didn't you handle it**
 11 **yourself?**
 12 A. Because my assistant principals -- and I
 13 as an assistant principal even -- handled the
 14 discipline on our students. Kevin had known Karl,
 15 worked with Karl. It was pretty normal practice.
 16 And, also, had it gone to a different level or had it
 17 been challenged or anything like that, you know, Ron
 18 Booth had always said you do it because I'm the next
 19 level of intervention. So that was partly my
 20 thinking.
 21 **Q. All right. By that point in the fall of**
 22 **2013, you had been involved in teaching or being an**
 23 **administrator at a school for more than 20 years,**
 24 **right, or close to it?**
 25 A. Yeah. Yes, I think. I would have to do

85

1 the math. This is year 26, so yes.

2 **Q. Had you ever heard of a student**

3 **threatening to kill a teacher prior to that?**

4 A. Sure. Sure.

5 **Q. How often?**

6 A. Oh, I don't know. Maybe one to two

7 times in a couple of years you'd hear students making

8 comments like that.

9 **Q. So that was something that happened**

10 **every -- couple times a year?**

11 A. No, no. One or two times maybe every

12 couple of years, you'd have a kid make a comment like

13 that. Maybe. I don't know. It's hard put a number

14 on it.

15 **Q. And have you ever been involved in a**

16 **threat assessment where a student had threatened to**

17 **kill a teacher prior to that?**

18 A. No. The only other threat assessment I

19 recall being involved in was a student-to-student

20 situation.

21 **Q. And that was before the shooting?**

22 A. Yeah.

23 **Q. How was Tracy Murphy's demeanor when he**

24 **told you that Karl Pierson had threatened to kill him?**

25 A. He didn't really talk. Mark did all the

86

1 talking. And, again, I'm not sure how Tracy got

2 connected to Mark between the day before in the

3 afternoon to that afternoon. So he was -- Tracy was

4 quiet, so I don't recall outside of that.

5 **Q. So Tracy told you he was not happy with**

6 **the fact that you had delegated handling Karl and this**

7 **threat to Kevin Kolasa, right?**

8 A. Not then. He told me --

9 **Q. No, no. I understand that.**

10 A. -- like a year later.

11 **Q. That was afterwards?**

12 A. Much after.

13 **Q. All right. And what was your response**

14 **to him?**

15 A. I -- outside of not knowing Claire,

16 that's probably one of my biggest regrets.

17 **Q. Okay. Go ahead and take a minute.**

18 A. Sorry.

19 **Q. It's okay.**

20 MR. ROCHE: Why don't we take five.

21 A. Lessons learned, so to speak.

22 MR. ROCHE: We can take five.

23 (Brief pause.)

24 MR. ROCHE: Let's go back on.

25 **Q. (BY MR. ROCHE) Go ahead.**

87

1 A. It was a very hard conversation, but I

2 do regret that. He and I both said, I don't know if

3 it would have changed anything, but I'll never know

4 now.

5 **Q. When you went to -- you said it was the**

6 **calendar committee meeting that was over on Crocker**

7 **Street?**

8 A. Yeah.

9 **Q. Who all was at that meeting?**

10 A. Oh, I don't remember. Clay Abla, the

11 director of second ed gave me a leadership opportunity

12 to be on there.

13 **Q. Okay.**

14 A. I have kids in the district. First

15 role, I think, as a principal, not wanting to turn

16 that down.

17 **Q. Sure.**

18 A. It's an important --

19 **Q. That's not where I'm going with this.**

20 A. -- meeting.

21 **Q. I understand. What I was --**

22 A. I don't remember who else was there. I

23 don't. There were teachers, parents, district

24 personnel.

25 **Q. My question on that was actually headed**

88

1 **in a different direction.**

2 A. Okay.

3 **Q. And it was this. Do you recall when you**

4 **went to that meeting, did you discuss with anybody**

5 **there, oh, crap, what do I do with this kid who just**

6 **threatened to kill one of my faculty members?**

7 A. No, I don't remember talking about it.

8 **Q. Do you remember -- regardless of whether**

9 **it was at that meeting or subsequently but before the**

10 **shooting, do you remember talking to anybody on a**

11 **district level saying, Hey, I've got a kid who's got**

12 **some serious behavioral concerns. I just want to get,**

13 **you know, a second opinion on what to do with him?**

14 A. No.

15 **Q. Okay. My understanding is that the next**

16 **thing that you did related to Karl Pierson in**

17 **September of 2013 was go visit Tracy in the library**

18 **the next day?**

19 A. Yeah, I remember going down and just

20 checking on him and seeing if he was okay.

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

22 A. That's what I remember.

23 **Q. Okay.**

24 A. I remember standing at the circulation

25 desk and, How are you doing? And I don't remember

89

1 him, again, being -- I don't remember what was said
 2 specifically. I know he was upset by it. I got that
 3 out of it for sure.
 4 **Q. Okay. And you got that he was scared of**
 5 **Karl at that point, didn't you?**
 6 A. How scared, I don't know. I knew that
 7 he was definitely concerned.
 8 **Q. All right. Did Tracy Murphy, as best**
 9 **you can recall, tell you during that conversation that**
 10 **he was afraid of Karl's potential to actually do**
 11 **something violent?**
 12 A. I don't remember him telling me that
 13 specifically. And if he did, I don't know that it was
 14 violent to the point of killing somebody, even him.
 15 **Q. All right. Do you recall Tracy Murphy**
 16 **asking you during that discussion on September 5th if**
 17 **somebody could pull the video from the parking lot to**
 18 **show how Karl was behaving as he made this threat?**
 19 A. I do remember him asking me for that and
 20 directing him to Jill DeBow who pulls those videos for
 21 us. That's Darrell Meredith's secretary.
 22 **Q. And we now know that never happened,**
 23 **right?**
 24 A. Right.
 25 **Q. Do you have an understanding as to why**

90

1 **those videos were never pulled?**
 2 A. I don't.
 3 **Q. You do --**
 4 A. I didn't know they weren't pulled until
 5 pretty recently. I didn't know he never saw them
 6 until -- I mean, well after the fact.
 7 **Q. Did you ever see the videos?**
 8 A. I've never seen any videos related to
 9 this.
 10 **Q. Oh, I understand. Did you ever have a**
 11 **conversation with Jill DeBow or Darrell Meredith about**
 12 **why they didn't pull the video of the parking lot as**
 13 **Tracy Murphy had requested?**
 14 A. What I don't know is whether I had this
 15 conversation before or after. I remember someone,
 16 either her, Darrell, or Kevin, telling me it wouldn't
 17 have mattered because there's no sound. That's the
 18 only thing I remember about the videos and any kind of
 19 follow-up. And we knew what he had said. There was
 20 no reason to have to prove that. There was an ear
 21 witness, first ear witness, if you will.
 22 **Q. I take it you had an understanding that**
 23 **Kevin and Esther were going to be performing a threat**
 24 **assessment on Karl Pierson?**
 25 A. Completing the threat assessment

91

1 paperwork, yes. I'm pretty sure I asked for that to
 2 happen or directed for that to happen. That had to be
 3 part of a conversation before he came back into class.
 4 **Q. Did you see a copy of that threat**
 5 **assessment paperwork in September of 2013?**
 6 A. I did not.
 7 **Q. Were you supposed to get a copy of it?**
 8 A. Not that I was aware of. I mean,
 9 oftentimes it's the principal or designee, which is
 10 very often an assistant principal; so I don't know
 11 that it was a requirement that I get a copy. I do
 12 now.
 13 **Q. And I understand that. That's something**
 14 **that has changed since the shooting, right?**
 15 A. Yes.
 16 **Q. Did you ever ask for a copy of the**
 17 **threat assessment in the fall of 2013?**
 18 A. I don't think I did.
 19 **Q. And you're aware now that a copy of the**
 20 **threat assessment was never sent to district security**
 21 **as well, right?**
 22 A. Right.
 23 **Q. That's something you didn't know at the**
 24 **time that the threat assessment was completed or at**
 25 **any time prior to the shooting, right?**

92

1 A. I did not.
 2 **Q. And that was, we know, a mistake by**
 3 **Dr. Song; right?**
 4 A. Right.
 5 **Q. Did you learn in September of 2013 what**
 6 **the outcome of that threat assessment was?**
 7 A. I did.
 8 **Q. All right. Tell me what you learned and**
 9 **how you learned it about the outcome of that threat**
 10 **assessment.**
 11 A. Kevin told me that it came out a
 12 low-level threat. That's what I remember the most out
 13 of -- specifically out of that. Kevin told me in a
 14 conversation.
 15 **Q. All right. Did you have a meeting**
 16 **specifically to discuss Karl Pierson and the threat**
 17 **assessment that was performed on him, or was this just**
 18 **a passing comment?**
 19 A. That was a passing comment. We always
 20 discuss discipline issues in our administrative team
 21 meetings, and I know Kevin gave us the outcome as a
 22 team there; but it wasn't a very lengthy -- I don't
 23 recall it being a very lengthy conversation.
 24 **Q. Do you recall having any discussion with**
 25 **him about the reasoning behind the conclusion that**

93

1 **this was a low-level threat?**
 2 A. Yes. I definitely recall having that
 3 conversation. I recall some of the reasoning and
 4 feeling okay with it based on the reasoning.
 5 **Q. All right. Tell me about the**
 6 **conversation where Kevin Kolasa explained the**
 7 **reasoning behind the assessment that Karl was a**
 8 **low-level threat.**
 9 A. You mean specifically what was the
 10 reasoning he gave?
 11 **Q. Yes.**
 12 A. He -- it was an indirect threat. He
 13 didn't specifically identify Tracy. And I'm also
 14 thinking back to the conversation remembering we had
 15 informed our SRO, who, in my mind, confirmed that it
 16 was not a direct threat because they couldn't do
 17 anything further with it either as a law enforcement
 18 agency; but he took a report. I felt comforted, if
 19 you will, by that, reassured in the decision. He had
 20 gone to therapy outside and was -- they cleared him to
 21 be safe to be back at school and that he would
 22 continue therapy. Tracy was willing to -- at a later
 23 time but willing to work with Karl around speech and
 24 debate, so I felt like their relationship was probably
 25 going to be okay. He had no known access so weapons.

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1 He hadn't -- there was no -- I'm trying to think of
 2 the reasons that we elevate now compared to back then.
 3 I just felt reassured by Esther and Kevin's comments
 4 that it was going to be okay.
 5 **Q. Now, were your -- you mentioned both**
 6 **Esther and Kevin because, obviously, both participated**
 7 **in the threat assessment re-entry meeting that took**
 8 **place. Did you have a separate conversation with**
 9 **Esther?**
 10 A. Again, it would have -- I remember kind
 11 of talking with her in the cafeteria.
 12 **Q. Okay. Tell me about that conversation.**
 13 A. Nothing formal. Asking her, You feel
 14 good about it being low level? Are you confident in
 15 that? And her agreeing and supporting it and thinking
 16 he wouldn't really do anything violent. I just felt
 17 reassured by that.
 18 **Q. And a significant part of why Karl was**
 19 **designated as a low-level threat was because**
 20 **Mrs. Pierson had reported to them that some outside**
 21 **therapist had seen Karl and wasn't concerned, right?**
 22 A. And I didn't know -- as I said earlier,
 23 I didn't know if Esther had gotten the paperwork for
 24 mom to speak to the outside therapist or if that had
 25 come from the parents. I just was told that he was

95

1 getting outside therapy ongoing. It wasn't just yes,
 2 he was cleared to come back and he's not a danger. It
 3 was, and he's going to continue to get therapy. I'm
 4 not sure how that came to Esther or Kevin, but they
 5 both assured me that he was going to continue getting
 6 that.
 7 **Q. And that's -- and that's one of the**
 8 **things I'm getting at is taking mom's word for it is**
 9 **one thing, but speaking directly to the outside**
 10 **therapist would be far more useful; wouldn't it?**
 11 A. It can be. It can be. I mean, it's
 12 hard to answer that with hindsight knowing a little
 13 bit more about the family than I ever knew before.
 14 And Kevin had worked with Karl, and I felt comforted
 15 by that too. He knew the kid. I didn't know the kid.
 16 I didn't.
 17 **Q. No. And trust me, I'm not asking you to**
 18 **substitute your judgment for theirs.**
 19 A. I know. I hear you.
 20 **Q. As I mentioned at the beginning of the**
 21 **deposition, this has both a forward and a backward**
 22 **looking component, this entire process. And one of**
 23 **the forward looking components that relates directly**
 24 **to this is does Arapahoe now ever condition a**
 25 **student's re-entry to the school on the ability to**

96

1 **speak to that student's outside therapist rather than**
 2 **taking the mother's or the father's word for what that**
 3 **therapist is saying?**
 4 A. We try. I don't know that we have the
 5 right without the parent's permission to do that.
 6 I've found in almost every case, very cooperative,
 7 parents, getting us that paperwork and the clearance
 8 for the psychologist and the counselors to talk to one
 9 another.
 10 **Q. And do you believe that's helpful?**
 11 A. Yes, I do.
 12 **Q. And has that process or policy or**
 13 **practice changed at Arapahoe since the shooting?**
 14 A. Well, like I said, we definitely push
 15 more for that. I don't know that we can keep a kid
 16 out of school if a parent absolutely says no, but I've
 17 had pretty good cooperation; so I would say yes, it's
 18 improved and changed and I think it's helped. Anytime
 19 you can communicate more, the adults can communicate
 20 more openly and honestly to support a kid, I believe
 21 it's better.
 22 **Q. All right. Now, you mentioned the**
 23 **administrative team meetings. And as I understand it,**
 24 **those happen once a week?**
 25 A. Mondays.

97

1 **Q. Okay. And if you'll look at Exhibit 12,**
 2 **there's reference -- those are some of the meeting**
 3 **minutes from those administrative meetings?**
 4 A. Um-hum.
 5 **Q. The first one where I see a reference to**
 6 **Karl Pierson is on September 16th, and it's page 2054.**
 7 A. Um-hum.
 8 **Q. Are you there?**
 9 A. Um-hum.
 10 **Q. All right. The reference on that page**
 11 **is in a discipline section?**
 12 A. Right.
 13 **Q. And it simply says, KP, no empathy or**
 14 **remorse. Do you see that?**
 15 A. I do.
 16 **Q. Who prepares this standing agenda?**
 17 A. My assistant, Amanda Clark.
 18 **Q. Okay. And do you know where the**
 19 **information about Karl Pierson having no empathy or**
 20 **remorse came from?**
 21 A. I don't know whose notes these are, so
 22 someone would have added -- actually, looking at just
 23 this document, I can't entirely answer that.
 24 **Q. All right.**
 25 A. The agenda comes out with a very basic

98

1 skeleton.
 2 **Q. So with just the numbered items, these**
 3 **are the eight things we're going to talk about?**
 4 A. Right. I don't know whether someone put
 5 that on there and then we talked about it or if in
 6 talking about discipline, someone took that as a note.
 7 So I don't know whose these are.
 8 **Q. Okay. Do you recall what the substance**
 9 **of the discussion was on September 16th about Karl**
 10 **Pierson?**
 11 A. I don't.
 12 **Q. Do you recall either at this**
 13 **administrative team meeting or in your conversations**
 14 **with Esther or Kevin ever hearing what monitoring or**
 15 **follow-up was going to be done with respect to Karl**
 16 **Pierson following this threat assessment that was done**
 17 **on him?**
 18 A. I do know they were going to meet again
 19 in a couple of weeks to discuss, see where he was and
 20 discuss whether or not he would be returning to speech
 21 and debate and at what level. That's what I remember.
 22 **Q. Did it raise any red flags with you at**
 23 **this administrative team meeting or elsewhere that the**
 24 **report back -- or one of the reports back from this**
 25 **threat assessment was that Karl showed no empathy or**

99

1 **remorse during the threat assessment meeting?**
 2 A. It didn't. Karl -- no, it didn't.
 3 **Q. Do you recall whether or not Kevin or**
 4 **Esther expressed to you that it raised red flags with**
 5 **them that he showed no empathy or remorse?**
 6 A. I don't recall them ever being overly
 7 concerned about him.
 8 **Q. Did you have any additional discussions**
 9 **with Tracy Murphy between the day you went to check on**
 10 **him on September 5th and that later meeting with Karl**
 11 **about what his ongoing role at the speech and debate**
 12 **team was going to be?**
 13 A. No. I remember only from Kevin that
 14 they were going to meet again to discuss it. I don't
 15 recall talking to Tracy.
 16 **Q. And at some point during September of**
 17 **2013, did Tracy Murphy tell you that he was afraid of**
 18 **Karl Pierson?**
 19 A. I don't remember him saying that
 20 specifically, no.
 21 **Q. Did you ever hear from any source that**
 22 **Tracy Murphy was scared of Karl Pierson?**
 23 A. I'm trying to remember if Kevin or
 24 Esther ever said that explicitly. I can't answer that
 25 definitely.

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1 **Q. Were you aware at any time prior to the**
 2 **shooting that Tracy Murphy was so afraid of Karl**
 3 **Pierson doing something violent at school that he was**
 4 **seriously considering resigning and just leaving the**
 5 **school?**
 6 A. No. Tracy told me that in that
 7 conversation I had with him after. That's the first
 8 time I had ever heard that. I had had a conversation
 9 in the -- my first year as principal with Tracy in the
 10 spring of 2013 about -- it was nothing about Karl
 11 Pierson, but that he was talking about resigning at
 12 that point because he didn't feel valued in his
 13 position as the library media specialist and he
 14 doesn't think teachers value him and it was really
 15 just kind of a cheerleading pep talk for Tracy. He
 16 told me, Maybe I should just resign and you could save
 17 staffing that way and you could hire para-pros to do
 18 my job. Heritage has a para-pro to do the whole
 19 library. And it was a late afternoon conversation
 20 where Tracy talked about resigning at that point. So
 21 it was well before any of this happened.
 22 **Q. Okay. And for totally different**
 23 **reasons?**
 24 A. Yeah. He didn't mention -- now way
 25 after the fact, as I said, he did share that with me;

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1 and, in fact, he said he wished he would have told me
 2 that.
 3 **Q. All right. And you know that he told**
 4 **other administrators prior to the shooting that he was**
 5 **considering resigning, right?**
 6 A. I didn't know that then.
 7 **Q. But you do now?**
 8 A. Yes.
 9 **Q. Okay. And as far as the timing, you're**
 10 **exactly right. And none of those administrators,**
 11 **Kevin Kolasa, Esther Song, Bryan Jesse, none of them**
 12 **shared that with you in the fall of 2013?**
 13 A. Not that I recall. It's not on my radar
 14 at all.
 15 **Q. Did you have any other conversations or**
 16 **discussions about Karl Pierson in September of 2013**
 17 **prior to the review meeting that we've talked about?**
 18 A. I don't remember having any. That's not
 19 to say if someone said they did -- if you told me who,
 20 I might remember; but nothing stands out to me that I
 21 remember.
 22 **Q. And I will tell you I'm not here to try**
 23 **to trap you or trick you. I'm not aware of any**
 24 **others.**
 25 A. Okay.

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1 **Q. I'm just asking you if you remember any.**
 2 A. I do not.
 3 **Q. All right. The next thing that I know**
 4 **about was the review meeting that happened towards the**
 5 **end of September. And that was the meeting with Tracy**
 6 **Murphy, Kevin Kolasa, Esther Song, Karl; right?**
 7 A. Yeah. I wasn't there, but yeah.
 8 **Q. Right. And I understand that. Do you**
 9 **recall any discussions with Tracy or Esther or Kevin**
 10 **to prepare for that meeting?**
 11 A. I think Kevin or Bryan Jesse -- again, I
 12 don't remember which one -- asked me if I would be
 13 supportive of -- I think they were going to land on
 14 offering Karl the opportunity to still compete in
 15 speech and debate because it was his passion and what
 16 he loved the most; and Tracy didn't want to take that
 17 away from him, but he also didn't want to have to deal
 18 with his antics and behavior that Tracy disliked at
 19 practice.
 20 So the idea would be that Karl could
 21 potentially compete in speech and debate for Arapahoe
 22 but not go to practices and that he was fully capable
 23 of preparing even without going to practices at
 24 Arapahoe, and would I be supportive of that. That's
 25 what we were considering offering him. And I thought

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1 that seems like a great compromise for a kid, and so
 2 that's all I remember prior to.
 3 **Q. Do you remember anybody telling you as**
 4 **part of that discussion in the lead-up to the**
 5 **September 26th review meeting that part of Tracy**
 6 **Murphy's motivation for letting Karl stay on the**
 7 **debate team was that if that participation was removed**
 8 **from him that that would be the point at which Karl**
 9 **would snap and attack the school?**
 10 A. No, absolutely not.
 11 **Q. Has Tracy told you that since the**
 12 **shooting, that that was his reasoning behind letting**
 13 **Karl stay on?**
 14 A. He may have in that conversation. I
 15 mean, I can -- after talking to Tracy and having that
 16 conversation, I could see that being his motivation.
 17 I can't say with 100 percent certainty that Tracy said
 18 that to me in that meeting; but in hindsight, I can
 19 see it.
 20 **Q. In the fall of 2013, did you ever have a**
 21 **conversation with Deputy Englert about Karl Pierson?**
 22 A. The only thing I remember asking him
 23 about Karl was what he could do with that threat, and
 24 he said all he could do was take a report. There was
 25 no direct threat made. I had a sense of, again, I

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1 guess, reassurance from Deputy Englert that he didn't
 2 think Karl was going to do anything, that he was just
 3 mad.
 4 **Q. And did you get a copy of Deputy**
 5 **Englert's report?**
 6 A. I did not.
 7 **Q. Have you now? Have you seen it since**
 8 **the shooting?**
 9 A. I don't remember. Maybe. I've seen a
 10 lot of things.
 11 **Q. Take a look at Exhibit 20. I think it's**
 12 **actually in the second book. Actually, this is a**
 13 **statement that Deputy Englert gave after the shooting.**
 14 **Do you see that?**
 15 A. Progress report.
 16 **Q. You'll see up at the top it says date**
 17 **typed January 31, 2014, and it describes an interview**
 18 **of James Englert on December 17th. Do you see that?**
 19 A. Yep.
 20 **Q. If you'll look at the third page of it,**
 21 **which is page 1939, in the middle of the page, bottom**
 22 **half of the page, there's a discussion of Deputy**
 23 **Englert and what he knew about Karl Pierson; right?**
 24 A. This last second-to-last?
 25 **Q. Yeah. That big paragraph with the one**

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1 **redacted thing. Do you see that?**
 2 A. Um-hum.
 3 **Q. And in there, Deputy Englert stated he**
 4 **did a report concerning Karl Pierson and that back in**
 5 **September he met with Kevin Kolasa and Mr. Kolasa said**
 6 **he wanted to tell him something, it's not that big of**
 7 **a deal, but just so you know. Do you see that? A**
 8 **little farther down.**
 9 A. Okay.
 10 **Q. Have you seen that statement before?**
 11 A. Un-un. No. No.
 12 **Q. Let me direct your attention as well to**
 13 **Exhibit 14, if I could, which is the sheriff's report**
 14 **on the shooting. I'm sure you've seen this?**
 15 A. Yes.
 16 **Q. And let me direct your attention to**
 17 **page 15 of the sheriff's report.**
 18 A. Yes.
 19 **Q. And in the middle of the page there,**
 20 **there's a discussion of Deputy Englert and Kevin**
 21 **Kolasa advising him about the threat that was made**
 22 **against Tracy Murphy and characterizing it as no big**
 23 **deal in quotes. Do you see that?**
 24 A. Yes, I see it.
 25 **Q. Have you -- are you familiar with the**

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1 **report that Kevin Kolasa told Deputy Englert that Karl**
 2 **Pierson's threat was no big deal?**
 3 A. That the threat was no big deal or that
 4 he got kicked off the speech and debate team? Because
 5 this one specifically says that, doesn't it? I have
 6 to tell you something. It's not that big of a deal,
 7 but just so you know. Mr. Kolasa told him that Karl
 8 Pierson had been kicked off the speech and debate
 9 team, the threat piece, I'm assuming, because that's
 10 consistent.
 11 **Q. Right.**
 12 A. This is the first time that I'm
 13 absorbing that he's saying that's no big deal. I read
 14 this, but it's been a while.
 15 **Q. All right. Well, would you agree with**
 16 **me that if one of your assistant principals is**
 17 **characterizing a threat to kill a teacher as no big**
 18 **deal, that's a problem; isn't it?**
 19 A. Kevin knew Karl much better than
 20 probably anyone, and so I have to believe Kevin had a
 21 reason he didn't feel it was credible.
 22 **Q. Well, what leads you to believe that**
 23 **Kevin knew Karl better than, say, Tracy Murphy?**
 24 A. Well, I don't know that -- maybe not
 25 better than Tracy. He worked with him in different

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1 ways. Tracy worked with him as a coach. Kevin worked
 2 with him as an administrator. And whenever Kevin
 3 worked with Karl, Kevin would describe to me as Karl
 4 being cooperative and apologizing for whatever it was
 5 that he did. I felt Kevin had a -- I thought Kevin
 6 had a pretty good relationship with Karl. I trusted
 7 Kevin's relationship with Karl.
 8 **Q. Does it concern you that Kevin**
 9 **characterized this threat to Deputy Englert as no big**
 10 **deal?**
 11 A. It's hard to answer that looking back at
 12 the time. In hindsight, yes.
 13 **Q. If you had been told about Kevin**
 14 **expressing a view that Karl's behavior on**
 15 **September 3rd was no big deal, would it have concerned**
 16 **you at the time? So strike the hindsight piece.**
 17 A. I probably trusted Kevin that it was no
 18 big deal. I think that's why I never got involved.
 19 **Q. All right.**
 20 A. And Karl was angry. He lost his
 21 position as captain of his favorite activity at
 22 Arapahoe.
 23 **Q. Well, since the shooting occurred, have**
 24 **you had a discussion with Kevin Kolasa about why he**
 25 **felt that the threat against Tracy Murphy was no big**

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1 **deal?**
 2 A. No, because I didn't know that he -- I
 3 don't know that Kevin ever described it that way to
 4 me; and I hadn't seen this report. I haven't talked
 5 much to Kevin. I don't work with him anymore.
 6 **Q. You're aware, though, that this "no big**
 7 **deal" comment is precisely how Tracy Murphy believed**
 8 **Kevin Kolasa treated the threat?**
 9 A. I'm aware of that now.
 10 **Q. Yes. I'm not suggesting you were aware**
 11 **of it then.**
 12 A. Yes.
 13 **Q. And you're aware that in addition to**
 14 **being unhappy that you didn't personally handle this,**
 15 **Tracy is very unhappy with how Kevin Kolasa handled**
 16 **this threat; aren't you?**
 17 A. Yes, Tracy told me.
 18 **Q. I have read in some of the sheriff's**
 19 **investigative reports that Karl was sent home from**
 20 **school on multiple occasions that weren't documented**
 21 **or formalized as suspensions. Can you speak to that**
 22 **at all?**
 23 A. I cannot. I'm not aware of that.
 24 **Q. Are you aware of any instances where**
 25 **Karl was sent home from school other than the three**

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1 **days in September of 2013 and after the Vicki Lombardi**
 2 **outburst in December of 2013?**
 3 A. No. Where he was sent home and not
 4 suspended?
 5 **Q. Yes.**
 6 A. No.
 7 **Q. Would that ordinarily be documented**
 8 **somewhere or should it be?**
 9 A. It would be documented in Infinite
 10 Campus. If it were sent home for a discipline reason,
 11 it would be under discipline. If it were sent home
 12 for a mental health reason, it might be in the
 13 counseling contact log, sent home by --
 14 **Q. Somebody. Let's look at a couple of**
 15 **those documents. Take a look at Exhibit 24. Do you**
 16 **got that in front of you?**
 17 A. I think so.
 18 **Q. It's a behavior detail report.**
 19 A. 200?
 20 **Q. Yeah, 200. This is a behavior detail**
 21 **report on Karl Pierson, right?**
 22 A. Yes.
 23 **Q. And as I review this, there are a couple**
 24 **of incidents that just aren't documented anywhere on**
 25 **here. So let me ask you about those. The first is a**

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1 **incident in November of 2011 that involved Jackie**
 2 **Price. Do you know Jackie Price?**
 3 A. I do.
 4 **Q. Are you familiar with the incident I'm**
 5 **referring to?**
 6 A. No.
 7 **Q. All right. Well, let me -- let me help**
 8 **you out.**
 9 A. Can I ask, is that -- Karl graduated --
 10 would have graduated in '14. It would have been his
 11 freshman year; is that right?
 12 **Q. Yes. And that incident involved Karl**
 13 **having an outburst in class and telling some other**
 14 **kids to go cut themselves or to go gut themselves.**
 15 **Are you familiar with that incident from any source?**
 16 A. I remember reading it after somewhere.
 17 **Q. All right.**
 18 A. I don't know where.
 19 **Q. Do you know whether or not Karl was sent**
 20 **home as a result of that incident?**
 21 A. I don't. I don't know.
 22 **Q. Should he have been suspended or --**
 23 A. I don't know enough about the incident
 24 to say that.
 25 **Q. All right. There was another incident**

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1 **in March of 2013 where Karl was suspended, right?**
 2 A. Yes, that one is on here.
 3 **Q. Pardon me?**
 4 A. That one is on here, right? No.
 5 **Q. You tell me. It should be, shouldn't**
 6 **it?**
 7 A. I can't say. What is the top one?
 8 **Q. The top one is Vicki Lombardi.**
 9 A. So, no, it's not.
 10 **Q. The top two are Vicki Lombardi. The**
 11 **bottom two on page 1 are the threat to kill Tracy**
 12 **Murphy.**
 13 A. Okay.
 14 **Q. And the next thing on this behavior**
 15 **detail report goes all the way back to elementary**
 16 **school, right, on page 2? Do you see that?**
 17 A. Yes.
 18 **Q. Should the March 2013 suspension be on**
 19 **here?**
 20 A. He was suspended from school?
 21 **Q. Yes.**
 22 A. Yes, it should be in Infinite Campus
 23 discipline.
 24 **Q. Have you ever asked anybody why it's not**
 25 **in Karl's behavior detail log?**

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1 A. No. I wouldn't have looked at it, no.
 2 I wasn't -- he wasn't in my grade level, so I wouldn't
 3 have been paying attention to that at all. I had 500
 4 of my own grade level kids that I was trying to keep
 5 track of, so no.
 6 **Q. And I understand that. But I'm talking**
 7 **about now either the 2011 --**
 8 A. I'm not sure I realized it until seeing
 9 this that it wasn't.
 10 **Q. Well, and that's my question is, did you**
 11 **prior to just a minute ago realize that neither the**
 12 **2011 incident in Jackie Price's class nor the 2013**
 13 **incident that led to his suspension in Dan Swomley's**
 14 **class were documented in Karl Pierson's behavior**
 15 **detail report?**
 16 A. I'm not sure the 2011 one should have
 17 been; but the one that was -- where there was a
 18 suspension, no, I was not aware that it was not
 19 documented in the behavior.
 20 **Q. Have you had any conversations with**
 21 **Kevin Kolasa or Esther Song or anybody about why those**
 22 **incidents don't appear in the behavior detail report?**
 23 A. I have not.
 24 **Q. Would it have been important to know**
 25 **about those as part of performing the threat**

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1 **assessment on Karl Pierson?**
 2 A. Kevin knew. I mean, he did it. I think
 3 the information about him was there. Kevin knew about
 4 that suspension.
 5 **Q. Take a look at Exhibit 35, if you would.**
 6 **That's the threat assessment that was done on Karl**
 7 **Pierson, right?**
 8 A. Yes.
 9 **Q. And Kevin Kolasa participated in this**
 10 **threat assessment, right?**
 11 A. Yes.
 12 **Q. And Kevin was the one who had authorized**
 13 **the suspension for the March 2013 incident, wasn't he?**
 14 A. I believe so. He was his administrator,
 15 yes.
 16 **Q. And six months later he's sitting in a**
 17 **room filling out this threat assessment paperwork with**
 18 **Esther Song, right?**
 19 A. Right.
 20 **Q. And one of the questions that's asked on**
 21 **page 2 of this threat assessment is history of school**
 22 **discipline, right?**
 23 A. Where is that?
 24 **Q. In the early warning signs factors.**
 25 A. Yes, I see it. At-risk.

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1 **Q. Or at-risk factors. Do you see that?**
 2 A. Yes.
 3 **Q. And one of the questions that's asked is**
 4 **has this kid ever been suspended, right?**
 5 A. Yes.
 6 **Q. And it's not even checked. That's a**
 7 **problem, isn't it?**
 8 A. I don't know why it's not checked. He
 9 had been suspended.
 10 **Q. Right. And it's important for the**
 11 **people who are filling these kinds of things out and**
 12 **performing these kinds of assessments to get the**
 13 **information right, isn't it?**
 14 A. Yes.
 15 **Q. And whether it's because it's not**
 16 **documented somewhere else or because he just didn't**
 17 **think it was a big deal, that's something Kevin Kolasa**
 18 **got wrong on Karl Pierson's threat assessment; isn't**
 19 **it?**
 20 A. Yeah. He didn't check the suspension
 21 box or Esther didn't. I believe Esther completed the
 22 form, but that information should have been shared.
 23 **Q. Let's talk about that September 26th**
 24 **action plan review meeting that happened. I know you**
 25 **weren't there. Were you told anything about how that**

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1 **meeting went after it occurred?**
 2 A. I was told only he would -- that was the
 3 result. He would compete with the team and not
 4 practice. That's what I remember about that meeting,
 5 the outcome of that meeting. I was told the outcome.
 6 **Q. Were you told anything about how Karl**
 7 **behaved at that meeting or any other detail about that**
 8 **meeting?**
 9 A. What I don't know is whether I was told
 10 this before or after.
 11 **Q. Okay.**
 12 A. That's the problem with saying. I
 13 believe Tracy shared with me -- and I do think it was
 14 after because I don't remember talking to Tracy about
 15 Karl except for in that heart-to-heart hard meeting
 16 that we had -- he didn't feel Karl was sorry. He
 17 didn't -- he still didn't feel like they had a good
 18 honest relationship.
 19 **Q. Do you recall -- and I appreciate that.**
 20 **Do you recall when you were told about the outcome of**
 21 **that meeting, who was talking?**
 22 A. Probably Kevin. Kevin is who I recall
 23 talking mostly to about Karl Pierson.
 24 **Q. Do you recall any discussions with**
 25 **Esther Song after that September 26th meeting about**

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1 **Karl Pierson at any time?**
 2 A. I don't specifically recall.
 3 **Q. And going back to Exhibit 12, those are**
 4 **the administrative team meeting minutes, you'll see on**
 5 **page 2049 -- other direction, I think. Oh, all right.**
 6 A. 47, 48, 78. There's just some pages out
 7 of order.
 8 **Q. And, frankly, I'm not sure why.**
 9 A. I've got 50. What's the date on the
 10 top?
 11 **Q. September 30.**
 12 A. All right.
 13 **Q. Are you there?**
 14 A. Yeah, it's 2049. It's just way out of
 15 order.
 16 **Q. At the September 30, 2013 administrative**
 17 **team meeting, there is, again, a reference to KP in**
 18 **the discipline section of the agenda. Is it your**
 19 **understanding that that's a reference to Karl Pierson?**
 20 A. Probably because it's September 30th,
 21 and that meeting would have taken place the 26th.
 22 **Q. Right. So do you believe this is the**
 23 **meeting where you were told what the outcome of**
 24 **that --**
 25 A. Yeah, I do believe that. I may have

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1 been told by Kevin, though, also one-on-one prior to
 2 telling the whole team, administrative team.
 3 **Q. All right. Do you recall having any**
 4 **other discussions -- I think I asked the question**
 5 **about Esther Song. Do you recall having any other**
 6 **questions or any other conversations with Kevin Kolasa**
 7 **about Karl Pierson between this September 30**
 8 **administrative team meeting and the shooting?**
 9 A. I meet one-on-one with all of my APs; so
 10 I'm sure, as I said, one-on-one with Kevin, he
 11 probably shared this with me prior to going into the
 12 team, but nothing -- no different information.
 13 **Q. All right. What about after this**
 14 **administrative team meeting? Do you recall any**
 15 **other --**
 16 A. I don't. Nothing that gives me any more
 17 information or nothing where I recall any further
 18 information or anything different than we've already
 19 talked about about Karl Pierson.
 20 **Q. All right.**
 21 A. Oh.
 22 **Q. Go ahead.**
 23 A. Specific to speech and debate, that
 24 he -- he needed to get his grades up. So he was -- I
 25 think Kevin shared with me maybe once in our weekly

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1 meeting that, yes, he's supposed to be competing; but
 2 he can't compete right now because he has two Fs.
 3 They follow the same eligibility -- it's governed by
 4 CHSAA, so same eligibility virtually as athletics.
 5 But that's it. I mean, there was nothing more I
 6 remember after September 26th until the shooting.
 7 **Q. As best you can recall, when did you**
 8 **have this conversation with Kevin Kolasa about Karl's**
 9 **grades?**
 10 A. Boy, I don't know. I don't know. It
 11 could have been anywhere from the 30th to the
 12 following week. I met with Kevin on Friday. I would
 13 have to go back and look at my notes to specifically
 14 recall when he would have told me about his grades.
 15 **Q. But it was sometime in the fall of 2013?**
 16 A. Yeah. And that Kevin didn't seem
 17 worried about it. Karl was smart. He would get his
 18 grades up if he wanted to compete.
 19 **Q. Well, the reason I wanted to ask about**
 20 **that is Tracy Murphy testified that he saw the**
 21 **eligibility reports with respect to his team members**
 22 **on a weekly basis.**
 23 A. Yes, he would.
 24 **Q. And that by the third week of October or**
 25 **first week of November, he realized that Karl had**

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1 **several Ds and Fs in his grades and was not eligible**
 2 **to compete for speech and debate.**
 3 A. All right.
 4 **Q. And he brought that to Kevin Kolasa's**
 5 **attention and that he considered -- he, Tracy Murphy,**
 6 **considered that to be a red flag. Would you agree**
 7 **that is the kind of thing that can be a red flag,**
 8 **right, if a kid's grades nosedive?**
 9 A. It can be. Yes, it can be.
 10 **Q. And Karl's grades had nosedived that**
 11 **semester, hadn't they?**
 12 A. I have been told they had. I do get
 13 grade reports on all the students weekly. I don't
 14 remember what Karl's grades were prior to that, so I
 15 don't know the reference to say that they nosedived.
 16 I know he had competed in speech and debate the spring
 17 before so he had been eligible, I'm assuming, most of
 18 that season.
 19 **Q. Well, were you paying any additional**
 20 **attention to Karl's grades or Karl's behavior in the**
 21 **fall of 2013 given the fact that he had just**
 22 **threatened to kill a teacher earlier in the semester?**
 23 A. No.
 24 **Q. And going back to the conversation with**
 25 **Tracy Murphy and Kevin Kolasa -- and I know you**

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1 **weren't a part of this conversation -- but Tracy**
 2 **Murphy testified that when he told Kevin Kolasa about**
 3 **Karl's grades nosediving -- and that's Tracy's words,**
 4 **not mine --**
 5 A. Sure.
 6 **Q. -- Kolasa's response was to kind of**
 7 **shrug his shoulders and kind of brush it off saying,**
 8 **Let him hang himself kind of thing. Have you heard**
 9 **that before?**
 10 A. No, I have not.
 11 **Q. That's a terrible attitude for a teacher**
 12 **or an administrator to have, isn't it?**
 13 A. It's not a very -- did he say that
 14 explicitly or something like that?
 15 **Q. Well, I just read you what Tracy Murphy**
 16 **said.**
 17 A. I thought you said or something like --
 18 can you read that one more time?
 19 **Q. Sure.**
 20 A. These are Tracy's words?
 21 **Q. These are Tracy's words talking about**
 22 **Karl's grades and the fact that he had several Fs and**
 23 **Ds. So I brought it to his -- Kevin Kolasa's --**
 24 **attention. He told me he was aware of it, the**
 25 **counselors were aware of it. I think I may have -- I,**

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1 Tracy -- may have said something to the effect that,
 2 you know, This is a big red flag and he -- Kevin --
 3 kind of shrugged his shoulders and kind of brushed it
 4 off saying, Let him hang himself kind of thing.
 5 A. That's not -- that's not good.
 6 Q. I asked Tracy, Did Kevin Kolasa tell you
 7 he was going to do anything to investigate that? And
 8 his response was, He let me know he was aware of it.
 9 Were you aware of those statements being attributed to
 10 Kevin Kolasa prior to just now?
 11 A. No.
 12 Q. When I asked Tracy about it, he said he
 13 was not just disappointed but astonished that an
 14 administrator would have that kind of attitude. Do
 15 you share his view?
 16 A. I can't speak exactly as Tracy would,
 17 but I'm sure that's why Tracy told me he wished he
 18 would have come to me. I'm disappointed to hear that,
 19 those quotes from Kevin or alleged quotes from Tracy
 20 about Kevin. I'm disappointed to hear that.
 21 Q. Given the fact that Karl had just been
 22 the subject of a threat assessment a month or so --
 23 two months maybe prior, what should have been done
 24 once an administrator became aware that his grades had
 25 declined sharply?

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1 A. Well, given any situation like that now,
 2 I would expect a phone call to the parents, probably
 3 reconvening the team of folks that sat down to
 4 complete that threat assessment document, and maybe
 5 follow up on the expectations that were put in place
 6 and revise them, if need be, at minimum a conversation
 7 with Karl and his parents about his grades.
 8 Q. Do you know if any of that happened?
 9 A. I don't. I don't know.
 10 Q. Well, actually, we know it didn't; don't
 11 we?
 12 A. I don't know that. I didn't. I mean,
 13 like I said, there's been a lot of things that I've
 14 heard, like you said, in the past 23 months that --
 15 some of it I heard -- a lot of it -- most of it I
 16 heard after.
 17 Q. Okay.
 18 A. It's a pretty widely known
 19 expectation -- and not just by me as a principal, but
 20 by Ron Booth -- that we would be in communication with
 21 a counselor, with parents with the kid.
 22 MR. ROCHE: Again, we've been going for
 23 almost two hours. Why don't we take a quick break for
 24 lunch and come back. So 45 minutes or so. Come back
 25 at 1.

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1 THE DEPONENT: Sure.
 2 (Recess taken, 12:12 p.m. to 1:17 p.m.)
 3 MR. ROCHE: All right. Let's go back on
 4 the record.
 5 Q. (BY MR. ROCHE) Before the break, we
 6 were talking about what should have been done once the
 7 school administration, particularly Kevin Kolasa,
 8 became aware that Karl's grades were dropping. And my
 9 question is, does Arapahoe have something called a
 10 student intervention team to deal with kids whose
 11 grades are dropping off?
 12 A. So a SIT team is something -- student
 13 intervention team is something that came to be when we
 14 began the PLC or professional learning communities
 15 model back in 2007. And the SIT team was -- the idea
 16 of that was a group of people to intervene, if you
 17 will, for students. So is there a specific team at
 18 Arapahoe, no; but we do implement a SIT team process
 19 for students.
 20 Q. Okay. And what is the criteria for when
 21 the SIT team process is activated?
 22 A. It can come through a recommendation of
 23 either a counselor, a teacher, an administrator.
 24 Sometimes a parent will ask -- they don't call it by
 25 name, but they'll ask for a meeting around their

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1 child. And so we'll gather all of the teachers --
 2 they're usually at 6:45 in the morning -- the
 3 administrator for that student. So that's who's
 4 making up the SIT team. And we wanted consistency
 5 around the kid, not necessarily around the players on
 6 the SIT team.
 7 Q. Sure.
 8 A. Who knows them best. So the
 9 administrator, the counselor, sometimes a school
 10 psychologist -- if they were an IEP student, it might
 11 include a school psychologist -- and then the
 12 student's current teachers, sometimes teachers from
 13 the previous semester as well to gather information on
 14 a student about why they are not succeeding in the
 15 academic classroom.
 16 Q. And is it --
 17 A. What is working in your class, what's
 18 not working in your class, to get the information and
 19 share insight around helping a student improve
 20 academically.
 21 Q. Is it purely triggered by academic as
 22 opposed to behavioral concerns?
 23 A. I would say they're more often triggered
 24 by academic concerns. They are not exclusively
 25 triggered by academic concerns.

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1 **Q. Do you know, was there ever any**
 2 **consideration given to implementing the SIT process**
 3 **with Karl Pierson either as a result of his behavioral**
 4 **issues or his academic issues in the fall of 2013?**
 5 A. I don't know if there was or was not.
 6 That would have been more of an initial conversation
 7 between Kevin, as an administrator, and -- well, at
 8 the time it was Astrid Thurnau because she was subbing
 9 for Kelly Talen who was on maternity leave. So a
 10 counselor -- typically a counselor, administrator
 11 would initiate that.
 12 **Q. And has -- and you don't know whether or**
 13 **not that was done in Karl's case?**
 14 A. I don't know. I don't believe it was,
 15 but I don't know that there wasn't conversation about
 16 it. I don't know. That was your original question,
 17 was there a conversation. I don't know.
 18 **Q. And as part of that SIT process, is**
 19 **there ongoing monitoring or follow-up done by the team**
 20 **after the initial meeting with the student?**
 21 A. After the initial meeting, it's
 22 typically follow-up by the counselor and the
 23 administrator, at the very least, conversations back
 24 and forth with the teachers involved with the
 25 student's low grades, if that makes sense, the classes

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1 where the student might be underperforming. They
 2 might be involved, but not very often does the whole
 3 team get back together again in most cases.
 4 **Q. All right. Should there have been a SIT**
 5 **team process implemented in Karl's case based on what**
 6 **you know now?**
 7 A. I don't know that he would have been a
 8 SIT team kind of kid. There were -- from what I know,
 9 at the time, he had some grades that were As and Bs
 10 and some grades that were Ds and Fs; and he may not
 11 have been quite red flagged to that level to implement
 12 a SIT team.
 13 **Q. Okay.**
 14 A. Or to gather a SIT team.
 15 **Q. We had talked earlier -- and I'm going**
 16 **to go ahead and mark this as Exhibit 51, I guess.**
 17 **(Deposition Exhibit 51 was marked.)**
 18 **Q. And you'll see Exhibit 51 is an FBI**
 19 **record of a statement given by Christina Kolk on**
 20 **December 16th, 2013. Do you see that?**
 21 A. Um-hum.
 22 **Q. And --**
 23 A. Yes.
 24 **Q. And you haven't seen this before today,**
 25 **as I understand it?**

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1 A. No.
 2 **Q. All right. And this relates back to**
 3 **what I was asking you about earlier with respect to**
 4 **Karl Pierson being observed looking at guns and scenes**
 5 **of mass shootings. If you look at the bottom**
 6 **paragraph of page 1, you'll see that there.**
 7 A. I see it.
 8 **Q. And you had heard prior to today about**
 9 **Karl Pierson looking at guns, right?**
 10 A. Yes.
 11 **Q. After the shooting but before today?**
 12 A. Correct.
 13 **Q. But prior to today, you had never heard**
 14 **even from Darrell Meredith that Karl was seen looking**
 15 **not just at guns but at scenes of mass shootings?**
 16 A. Never, not from anyone.
 17 **Q. But you would agree with me if anybody**
 18 **at the school was aware of Karl looking at scenes of**
 19 **mass shootings in the fall of 2013, that's information**
 20 **that would have escalated the level of concern posed**
 21 **by Karl?**
 22 A. Anybody meaning specifically?
 23 **Q. Anybody who was aware of it.**
 24 A. I would hope that that would be
 25 escalated by anybody who saw it, particularly if there

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1 were mass shootings being watched in the cafeteria.
 2 **Q. Okay. We've talked quite a bit about**
 3 **Kevin Kolasa and what he did and didn't do in**
 4 **connection with his handling of Karl Pierson's**
 5 **behavioral issues in the fall of 2013. One statement**
 6 **that has been reported concerns an allegation that**
 7 **Kevin said, We're going to read about Karl in the**
 8 **paper someday, it's just not going to be while he's at**
 9 **Arapahoe. Have you heard that allegation?**
 10 A. I have not heard that. I have not heard
 11 -- I heard that after the fact.
 12 **Q. And I understand that.**
 13 A. There's been conversation about that
 14 after the fact, but I don't -- I didn't know who it
 15 was that said that. I had heard that statement made
 16 and people talking about it. I don't know who it was
 17 attributed to. I don't know that it was Kevin. I
 18 don't know that it was Darrell. I don't know that it
 19 was Mr. Swomley. I don't know who said that. I had
 20 heard about it.
 21 **Q. Okay. Well, tell me, what have you**
 22 **heard about that statement?**
 23 A. That it was an alleged statement. I
 24 don't know who started it or where it came from and
 25 that no one seems to own it. I've heard it wasn't

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1 said.

2 **Q. All right. You would agree with me if**

3 **anybody on your administrative team or faculty said**

4 **that about a student, it's inappropriate?**

5 A. It would depend, I think, on the context

6 where it was said and when. I don't know.

7 **Q. Tell me the context where it is**

8 **appropriate.**

9 A. Well, if it was something positive; so I

10 don't know where it was said and could it have been

11 misinterpreted and then become a rumor.

12 **Q. All right. Have you ever asked Kevin**

13 **Kolasa whether he made a statement like that?**

14 A. No. I don't think so. I don't remember

15 asking Kevin that.

16 **Q. Did you ever asked anybody whether Kevin**

17 **Kolasa made that statement?**

18 A. I don't think so.

19 **Q. Let's go back to our timeline. We've**

20 **talked about the discussion on September 30th where**

21 **you were told about the outcome of the review meeting**

22 **that occurred on the 26th, right?**

23 A. Yeah.

24 **Q. Did you have any other discussions,**

25 **conversations, interactions relating to Karl Pierson**

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1 **after that meeting other than the discussion about**

2 **grades that we've talked about, again, up to the point**

3 **of the shooting?**

4 A. The only person I would have talked with

5 would have been Kevin in my meetings with him on

6 Fridays, whether or not he was going to compete. The

7 timeline is a little fuzzy on this. I remember in one

8 of my Friday meetings in my office Kevin saying

9 something about Karl initially went to practice after

10 he got readmitted to school. When I say readmitted,

11 because, in my mind, I still think of that as a

12 suspension.

13 **Q. Okay.**

14 A. When he came back from his leave. And

15 Kevin had to get involved and reiterate to him that

16 he -- no, we specifically told you you're not to go

17 back to practice until we have that follow-up meeting.

18 I do remember that.

19 **Q. Okay.**

20 A. And he was going to touch base with

21 Tracy and touch base with Karl after that meeting.

22 And then I didn't really hear much else after that. I

23 think he responded -- he made some comment about not

24 knowing he wasn't supposed to go or something. Maybe

25 he really didn't know he wasn't supposed to go. But

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1 at any rate, Kevin made it very clear he wasn't to go

2 to practice until they had that meeting and decided

3 whether he was going to go back or not. I remember

4 that.

5 **Q. And that was earlier in September, right**

6 **after --**

7 A. Probably closer to --

8 **Q. -- the threat assessment meeting?**

9 A. -- to him coming back, yeah. And I

10 think he tried to go back right away to practice like

11 nothing had ever happened, and I really don't recall

12 anything else.

13 **Q. Take a look at Exhibit 11, if you would.**

14 **And I want to ask you about a series of incidents that**

15 **I don't know whether you were aware of or not. I just**

16 **want to find out.**

17 A. Sure.

18 **Q. Some of them we've covered, but if**

19 **you'll direct your attention to page 9. At the very**

20 **bottom of the page is a reference to an incident**

21 **involving Karl Pierson in Vicki Lombardi's Spanish**

22 **class where he says, "When do we get to drink**

23 **tequila?" Were you aware of that incident prior to**

24 **the shooting?**

25 A. No. Afterwards Vicki shared it with me.

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1 **Q. Is that the kind of incident you would**

2 **expect to be shared with you or with one of the grade**

3 **level assistant principals?**

4 A. Specifically from Mrs. Lombardi, no.

5 She is very good with kids; and I think she has a

6 good, strong relationship with her students and

7 handles things in her classroom and is great about

8 contacting parents and things like that. So if she

9 felt like it was resolved through conversations with

10 the parent and they were notified and -- it would

11 depend on how many times he may have acted out; but

12 no, not necessarily.

13 **Q. All right. What about the next**

14 **incident, which was a heckling remark that Karl made**

15 **to students in Mr. Hansen's class? Do you see that?**

16 A. Um-hum.

17 **Q. Was that an incident that you were made**

18 **aware of at the time it occurred?**

19 A. No. Again, I don't know what he said.

20 First time he ever -- if it was the first time he ever

21 did or said anything out loud or blurted anything in

22 Mr. Hansen's class, it makes sense he would not have

23 taken that to an administrator.

24 **Q. Have you ever talked to Mr. Hansen about**

25 **that incident?**

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1 A. I have not. I shouldn't say not ever.
 2 It probably was discussed in the days shortly after.
 3 I talked to so many people that remembered something
 4 about Karl, you know, here or there and everywhere.
 5 He may have been one that shared something about Karl,
 6 but -- so I don't want to say never talked to him.
 7 I'm not aware of having a conversation specifically
 8 about this with Mr. Hansen.
 9 **Q. Do you know whether or not any of**
 10 **Mr. Hansen's students expressed a concern about how he**
 11 **was handling Karl's behavior in that class?**
 12 A. I don't know that. To Mr. Hansen?
 13 **Q. To anybody.**
 14 A. I don't.
 15 **Q. Were you aware that, actually, Claire**
 16 **had expressed a concern because that was the class**
 17 **that Claire had with Karl, that she had expressed a**
 18 **concern that Mr. Hansen wasn't handling that problem?**
 19 A. I had heard that after, I think,
 20 somewhere from Desiree. Maybe I read it. I'm not
 21 sure.
 22 **Q. Okay.**
 23 A. I had heard that after the fact. It
 24 might have even been on a news report or something.
 25 You know, that's in my head for sure, but definitely

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1 not prior to; and I don't know to whom she expressed
 2 that concern.
 3 **Q. All right. Have you had -- and you**
 4 **haven't had any discussions that stand out in your**
 5 **mind with him about that issue?**
 6 A. No, no.
 7 **Q. All right. The next item in this list**
 8 **of events is No. 14, and it's a November 20 discussion**
 9 **that you had with Tracy Murphy. Do you see that?**
 10 A. Um-hum.
 11 **Q. And it looks to me like the two of you**
 12 **were talking about surveillance and security measures?**
 13 A. Yes.
 14 **Q. And in particular, Mr. Murphy was asking**
 15 **for security cameras to be placed in the library;**
 16 **right?**
 17 A. Yes.
 18 **Q. Tell me what you recall about those**
 19 **discussions.**
 20 A. Tracy and I -- and Darrell was working
 21 with us on this because at the time he was overseeing
 22 the building -- were looking forward to making kind of
 23 some upgrades in the library. It desperately needed
 24 that. And part of it was around tables and seating
 25 the space differently and bringing in more electricity

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1 so that we could infuse more technology in the
 2 library; and at the same time we were going to be
 3 dropping wires, that would be a great time to get some
 4 surveillance in the library because, no, there was
 5 none. So that's -- and we had found money within our
 6 school budget and a little bit of help from the
 7 district as far as -- what do you call it where you
 8 actually do the work? What do you call it? I forget.
 9 Labor.
 10 **Q. Okay.**
 11 A. The labor cost, the district would pick
 12 that up; and so we were going to move on that pretty
 13 quickly. Tracy and I had met about furniture and
 14 tables, and he and Carla Brachtenbach had picked some
 15 stuff out. We had the budgeting kind of figured out,
 16 so we were planning to do that and move forward with
 17 it.
 18 **Q. All right. And during that**
 19 **conversation, Tracy Murphy observed that, "If anything**
 20 **is going to happen, it's going to happen here"?**
 21 A. Yeah. I remember him saying that. He
 22 said it's the library. It's very, very populated.
 23 There's always kids in here.
 24 **Q. And was that in the context of -- what**
 25 **did you understand him to mean when he said "if**

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1 **anything happens"?**
 2 A. Something bad, something bad happening,
 3 something violent, anything. He didn't specifically
 4 say what, but something bad.
 5 **Q. All right. And did you understand that**
 6 **he was referring to Karl Pierson in whole or in part?**
 7 A. No. It did not raise that flag for me
 8 at all.
 9 **Q. All right. And the day before the**
 10 **shooting, you and some other people, including Darrell**
 11 **Meredith and Tracy Murphy, visited the library to look**
 12 **for locations for the security cameras?**
 13 A. Yeah. We were making measurements and
 14 looking at some of the poles and looking at where to
 15 drop data and looking at where to drop electricity,
 16 where would the cameras go, yes.
 17 **Q. All right. And that was the day after**
 18 **another outburst by Karl Pierson, wasn't it?**
 19 A. Yeah, but I didn't know that.
 20 **Q. Were you aware -- and we're going to get**
 21 **to that. But were you aware of the December 11**
 22 **outburst that Karl Pierson had?**
 23 A. I was aware there was an incident in
 24 Vicki's class that day. It was at the end of the day,
 25 and I had -- was coming back to the building from

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1 somewhere. I didn't know the extent of him -- to call
 2 it violent, I didn't know that until after the fact.
 3 **Q. All right.**
 4 A. And we already had scheduled for the
 5 district folks to come down, so there was no
 6 connection there for me at all.
 7 **Q. And I understand that. I'm not**
 8 **suggesting that the meeting on the 12th was prompted**
 9 **by the incident with Karl on the 11th.**
 10 A. It also didn't trigger anything for me.
 11 I didn't put two and two together.
 12 **Q. And that's where I was going. Was there**
 13 **any discussion of Karl Pierson during the walk-through**
 14 **of the library on December 12th?**
 15 A. Not that I recall at all.
 16 **Q. Okay. Now let's talk about that Vicki**
 17 **Lombardi incident or that incident in Vicki Lombardi's**
 18 **class. How did you learn about it?**
 19 A. Well, I learned about it a couple ways.
 20 Before the shooting, I learned about it just because
 21 Kevin had just sent Karl out when I came back to my
 22 office. And he said he dealt with it. Like there
 23 was -- Karl got mad because a kid locked him out. He
 24 just gave me kind of a short summary of it. After the
 25 fact, I got more specific information from --

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1 specifically from Vicki. I mean, she told me what had
 2 happened in her classroom.
 3 **Q. All right. What do you recall Kevin**
 4 **telling you about that incident exactly? You said he**
 5 **told me he handled it?**
 6 A. Karl got locked out. He went -- he left
 7 the classroom either right before the bell rang or
 8 right at the beginning of the class. When he came
 9 back, the door was locked. He pounded on the door to
 10 get in. And then Vicki was upset with him and told
 11 him to wait in the hall. And I don't know how -- how
 12 Vicki contacted -- how they contacted Kevin. Kevin
 13 was contacted and -- oh, no, I don't know. Maybe he
 14 wasn't even contacted yet. I don't know. At any
 15 rate, Karl had ended up in Kevin's office; and I think
 16 he went -- I think Karl might have gone on his own
 17 down to Kevin. I don't remember the specific details
 18 around it, but Kevin said he talked with Karl. He
 19 told him what happened. He apparently was honest
 20 about the situation, and Karl -- or Kevin said he
 21 needed to apologize to Ms. Lombardi, and he did not
 22 let him go back to class that day. I think it was the
 23 very end of the day.
 24 **Q. Do you remember hearing anything**
 25 **about -- well, strike that.**

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1 **Does Arapahoe have essentially an**
 2 **emergency number for teachers to call?**
 3 A. Yes.
 4 **Q. And what's that number?**
 5 A. 6000.
 6 **Q. Yeah. Vicki Lombardi testified that she**
 7 **was so concerned about Karl's outburst on the 11th**
 8 **that she used that number. Had you heard that from**
 9 **Kevin Kolasa on December 11?**
 10 A. He may have told me that. It's very
 11 common, and it can be for a plethora of reasons that a
 12 teacher would call 6000. It's the way they contact
 13 administration for anything they need.
 14 **Q. All right. Well, Ms. Lombardi testified**
 15 **that that was only the second time in her entire**
 16 **career of teaching that she had called that number.**
 17 A. I'm not surprised. Like I said, she
 18 handles her classroom. She has great rapport with
 19 kids. She never -- she doesn't have issues.
 20 **Q. So did it raise any red flags for you on**
 21 **December 11th that Karl had had yet another outburst**
 22 **and that it apparently so troubled Vicki Lombardi that**
 23 **she called the emergency number?**
 24 A. No, because at that time, I didn't know
 25 how escalated the incident was in Vicki's -- like I

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1 said, I had -- I had come back into the building after
 2 he had just -- Karl was gone. It was over. So I
 3 wasn't even in the building when that took place. So
 4 I did know about it. The extent to which Karl was
 5 amped up, I did not know that until after.
 6 **Q. All right. Did you tell Mr. Kolasa to**
 7 **do anything after he informed you of this incident in**
 8 **Vicki Lombardi's class?**
 9 A. I don't remember. What I -- no, I don't
 10 think so. I don't remember.
 11 **Q. Did he tell you that he was going to do**
 12 **anything after this outburst?**
 13 A. I honestly don't remember if he -- I
 14 would think he would have told me he was going to
 15 follow up with Vicki and that kind of thing. I know
 16 Vicki told me that he did -- Karl came and apologized
 17 to her.
 18 **Q. The next day?**
 19 A. Yeah.
 20 **Q. But do you recall hearing from Kevin**
 21 **that he was going to call Karl's parents, tell Esther**
 22 **Song, reconvene the threat assessment team?**
 23 A. No.
 24 **Q. Ask mom whether or not Karl was actually**
 25 **continuing with therapy, any of those things?**

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1 A. I don't recall that.

2 **Q. You mentioned that you discussed this**

3 **incident with Vicki Lombardi after the fact, right?**

4 A. Um-hum.

5 **Q. And she wasn't very happy with Kevin**

6 **Kolasa and his handling of this incident either, was**

7 **she?**

8 A. She didn't say that to me. She said she

9 felt like Karl apologized and that she believed his

10 apology. She even -- I remember her telling me that

11 she even touched his shoulders and said, I forgive

12 you. But it was right after it happened that she

13 shared all of this with me. So, you know, I don't ...

14 **Q. Did she tell you that she was -- that**

15 **Karl scared her and the students in her class?**

16 A. She told me that yes, and that's why she

17 called.

18 **Q. All right. Did she tell you that she**

19 **had also told Kevin Kolasa more than once that Karl**

20 **scared her?**

21 A. No. Well, after she did.

22 **Q. Yeah.**

23 A. But Kevin had never -- I had never heard

24 that until after the fact with Vicki. So Kevin hadn't

25 brought that to my attention. Vicki had never brought

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1 that to my attention before.

2 **Q. Did you have any discussions after the**

3 **shooting with Kevin Kolasa about that Vicki Lombardi**

4 **incident?**

5 A. I'm sure we did because the

6 administrative team met a ton trying to process and

7 gather as much information as we could and learn about

8 it. I don't know that it was specifically with Kevin

9 alone.

10 MR. ROCHE: Let's go ahead and mark this

11 as Exhibit 52.

12 (Deposition Exhibit 52 was marked.)

13 **Q. (BY MR. ROCHE) And you'll see**

14 **Exhibit 52 is an excerpt of the deposition I took of**

15 **Vicki Lombardi. The second page of the exhibit -- you**

16 **can see there's four pages of testimony to each page**

17 **of the exhibit. At the top of page 59, she confirmed**

18 **that she didn't talk to you about this incident prior**

19 **to the shooting. And that's consistent with what you**

20 **just told me, right?**

21 A. Correct.

22 **Q. On the next page, I ask Ms. Lombardi**

23 **whether she had any conversations with you about her**

24 **perception that Mr. Kolasa did not take that incident**

25 **on the 11th as seriously as he should have. Do you**

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1 see that?

2 A. I do.

3 **Q. And her answer was "I think I did." And**

4 **then she goes on to explain it, and she says she told**

5 **you that she was disappointed about Kevin's handling**

6 **of that incident. Do you see that?**

7 A. I do.

8 **Q. Does that refresh your recollection of**

9 **any conversations you may have had with Vicki Lombardi**

10 **that she was disappointed that Kevin Kolasa didn't**

11 **treat that incident as seriously as she felt he should**

12 **have?**

13 A. I don't recall it happening in December.

14 I really don't. But, again, I don't know. Clearly,

15 it's not clear to me everything I knew before and

16 everything I knew after.

17 **Q. And I'm asking -- I believe this was**

18 **after the fact. So I'm asking the question, assume it**

19 **occurred after the shooting.**

20 A. But it says -- oh, the incident on

21 December 11th.

22 **Q. Yes.**

23 A. Yes.

24 **Q. Do you recall having conversations with**

25 **Vicki Lombardi after the shooting in which she told**

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1 **you she was disappointed in how Kevin Kolasa handled**

2 **the incident that occurred on December 11th?**

3 A. I don't recall her specifically saying

4 she was disappointed about it, but she could have very

5 easily. I don't want to say that I remember exactly

6 what she told me. I'm -- I can see -- I can see why

7 she would have been in hindsight disappointed in the

8 way it was handled. I can. So she could have said

9 that to me very easily, and I'm just not remembering.

10 **Q. Okay. Well, setting aside what Vicki**

11 **Lombardi felt about Kevin's handling of that incident,**

12 **are you disappointed in his handling of that incident?**

13 A. I don't know if I -- I mean, of course

14 because of everything that's happened, yes. At the

15 time, after hearing Vicki say Karl apologized, she

16 believed him, maybe he handled it the best way -- I

17 believe Kevin handled it the best way he could and

18 thought he should. I don't know. I don't know. It's

19 a hard question to answer in hindsight. It is.

20 **Q. Sure. Well, let's try and look at from**

21 **a perspective other than hindsight. I'm going to ask**

22 **you --**

23 A. Forward look.

24 **Q. -- to go ahead and look at 35 again.**

25 **And, again, Exhibit 35 is the threat assessment that**

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1 **Kevin Kolasa participated in for Karl Pierson in the**
 2 **fall of 2013; right?**
 3 A. Yes.
 4 **Q. And one of the things that is noted on**
 5 **that threat assessment is that mom reports deep-seated**
 6 **anger and Karl agrees that he's had anger management**
 7 **issues for a while. Do you see that in the**
 8 **handwriting?**
 9 A. Yes.
 10 **Q. And given the context that Karl had**
 11 **self-reported and so had his mom that he had serious**
 12 **anger issues and that he had threatened to kill a**
 13 **teacher a couple of months earlier and that here he is**
 14 **yet again having another angry outburst, wouldn't you**
 15 **have expected a member of your administration to do**
 16 **something upon learning that Karl was banging on the**
 17 **door so loud it scared the teacher of the classroom**
 18 **and the students in that classroom?**
 19 A. I can say that I wish he would have. I
 20 also notice here in looking back at this document
 21 right below it, this is where it talks about what
 22 happened in Mr. Swomley's class, I believe, where it's
 23 written in "other relevant details."
 24 **Q. Right.**
 25 A. A piece where he was suspended. But it

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1 didn't get translated on this side or wherever the box
 2 is for suspension right here. I don't know. That's
 3 from earlier conversation. I just realized that as
 4 I'm re-reading this.
 5 **Q. Okay.**
 6 A. It's not in Infinite Campus, but I hope
 7 it played into their conversation in the room.
 8 **Q. All right. Now, you said you talked to**
 9 **Kevin Kolasa on the 11th; right?**
 10 A. Yes, briefly.
 11 **Q. And my understanding is you were out of**
 12 **town on the 13th? So you must have left -- did you**
 13 **leave that morning or did you leave the 12th?**
 14 A. I left the night of the 12th.
 15 **Q. The night of the 12th, okay. And you**
 16 **were in Vegas for a family thing, right?**
 17 A. My daughter's competition, right.
 18 **Q. So how did you hear about the shooting?**
 19 A. Steve Sisler called me on my phone and
 20 said we were in lockdown and that there were shots
 21 fired in the library.
 22 **Q. When you got that call from Mr. Sisler,**
 23 **did he give you any indication of who it might be?**
 24 A. Not at that point.
 25 **Q. Did you have any thoughts about who it**

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1 **might be?**
 2 A. I didn't.
 3 **Q. How did you learn it was Karl?**
 4 A. It might have been my second or third
 5 phone call with Steve.
 6 **Q. All right. And was he the assistant**
 7 **principal who was essentially in charge of the school**
 8 **when you were out?**
 9 A. Yes.
 10 **Q. Okay. When did you come back to Denver?**
 11 A. Immediately. I just remember my bags
 12 were packed, someone did it, and I was on a plane.
 13 **Q. Yeah.**
 14 A. A big whirlwind. I was back in town by
 15 6.
 16 **Q. Go ahead. Take a minute.**
 17 A. It's okay.
 18 **Q. I really don't want to get into the**
 19 **details of that day.**
 20 A. It's okay. It's okay.
 21 **Q. No. But here's why, because I don't see**
 22 **it as being productive for the purposes of the**
 23 **arbitration. So I'm not going to just take you**
 24 **through that day, which was a horrible day, for no**
 25 **purpose. I do want to talk about something afterwards**

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1 **though.**
 2 A. Okay.
 3 **Q. As part of the sheriff's investigation,**
 4 **we've learned that there were a number of students at**
 5 **Arapahoe who either had seen Karl's gun or been told**
 6 **Karl had bought a gun or been shown pictures of Karl's**
 7 **gun. You've heard that, right?**
 8 A. Yeah, I've heard that. I had a student
 9 even ask me after the fact what do I do, I saw a
 10 picture. I said you need to talk to an investigator
 11 right away. One student came to me that I know pretty
 12 well. I think he was a freshman that year.
 13 **Q. And my question is this: The sheriff**
 14 **concluded that none of those kids were either involved**
 15 **in the shooting or told any of the faculty members at**
 16 **Arapahoe about what they had seen before the shooting**
 17 **happened, right?**
 18 A. Yeah, that's what I've heard.
 19 **Q. And my question is a much broader one,**
 20 **which is a cultural one. Does it concern you that**
 21 **there were that many kids who knew Karl had a gun and**
 22 **none of them talked to the adults in the building?**
 23 A. How many kids were there?
 24 **Q. At least a dozen.**
 25 A. Yes, that concerns me. And I don't know

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1 what Karl said to them. I don't know how he showed
 2 it. I don't know the context. I don't know. I don't
 3 know what he said. I'm surprised. I'm very surprised
 4 that none of them shared. So I wonder if he was very
 5 selective with whom he showed those pictures to, but I
 6 don't know.

7 **Q. And really that drives to the heart of,**
 8 **I think, one of the things we're trying to accomplish**
 9 **with this arbitration, which is how can a school like**
 10 **Arapahoe, or any school for that matter --**

11 A. Any school.

12 **Q. -- create a culture where there's enough**
 13 **openness that when something like that happens, a**
 14 **volatile kid like Karl is known to have a gun that the**
 15 **kids who learn that then tell the appropriate people?**
 16 **So I want to get your thoughts on that.**

17 A. I think I am doing all I can to try and
 18 keep the culture moving in that direction, more open
 19 dialogue and communication. I wish I knew -- I only
 20 know one student who, like I said, came to me. I wish
 21 I knew who those kids were. And hearing from them
 22 might give us some really good insight. Why didn't
 23 you? What would have helped you come forward?
 24 Without knowing what he said to them, it's really hard
 25 to give a definitive answer on that. But like I said,

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1 I'm consistently trying to get that culture, to keep
 2 that culture. We've always told kids let us know, let
 3 us know, let us know, let someone know, let an adult
 4 know, let a parent know, let a teacher know, let a
 5 counselor know, an administrator know, anything.

6 **Q. And I understand that. And the reason**
 7 **I'm asking about this is given that that's what the**
 8 **school had been doing and it, in this case, didn't**
 9 **lead those students to tell an adult, does that raise**
 10 **any concerns in your mind about the type of training**
 11 **that those kids are receiving?**

12 A. Well, or just an awareness around our
 13 responsibilities to tell and we're working on that. I
 14 think that's something that's definitely in our work
 15 all the time. You know, we just -- I don't know if
 16 you're aware. We just implemented an advisement
 17 program.

18 **Q. Yes. And that was something I wanted to**
 19 **talk to you about.**

20 A. It's brand new. The school newspaper
 21 didn't do us any favors because there's some negative
 22 comments from kids about it. But they'll get -- I
 23 believe that they will come around and give it a
 24 chance, but that's one of the avenues that we hope to
 25 be able to teach things in a little bit smaller

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1 setting where everybody has to be there with an adult
 2 in the classroom talking about things like how do you
 3 report something that you see, how do you use social
 4 media more responsibly, what do you do if you see
 5 something on social media, do you just ignore it, do
 6 you share. I don't want to get off topic. But an
 7 advisement program is one thing. And I think it's
 8 continually at the forefront of what we're doing
 9 culture-wise at Arapahoe in trying to get kids
 10 comfortable with coming to adults and sharing. I am
 11 quite shocked that there were 12 or more kids that saw
 12 that and didn't tell anyone. It's very strange to me,
 13 very strange for our kids. They're very good about
 14 coming forward in general, so I'm -- I'm surprised.

15 **Q. And that's exactly why I'm asking the**
 16 **question. I did want to ask you about advisement. So**
 17 **since we're on it, why don't you tell us what the**
 18 **advisement program is and why it was implemented.**

19 A. It is a -- we call it a homeroom, to use
 20 an old-fashioned term, where every kid at Arapahoe is
 21 assigned an advisement teacher. Some teachers are
 22 paired up with another teacher because either they
 23 weren't comfortable -- they expressed some angst about
 24 leading a group all by themselves. All of the
 25 administrators are in one of them and so are the

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1 counselors. So we thought it would be best to pair us
 2 up as well in case somebody was absent or whatnot. We
 3 could be pulled off and go help the group or work with
 4 the group that's missing their teacher for the day
 5 rather than a substitute teacher doing it. It's built
 6 around the ideas -- I'm not going to remember the four
 7 pillars off the top of my head -- but community,
 8 building community within the school, building
 9 community within the Arapahoe community, serving the
 10 community at a greater level other than just, you
 11 know, some community service ideas and things like
 12 that, school purposes, if you will. So maybe there's
 13 tasks that need to happen within an advisement period
 14 or a homeroom setting. There's two other pillars I'm
 15 not remembering off the top of my head. But basically
 16 another connection for kids in a smaller setting with
 17 kids of their grade level, and the topics will vary.
 18 We've got a core group of teachers that are very
 19 passionate about it. They came to us over the course
 20 of the -- beginning of school, end of summer asking
 21 administration, asking if they could -- if we could
 22 try this. And, of course, we tried a year ago to get
 23 this in place administratively and with our
 24 counselors; and our staff just wasn't ready. They
 25 didn't want to pile on one more thing, and department

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1 chairs pushed back a little bit. And this year when
 2 this core group of teachers came and it was teacher
 3 driven and teacher led, I felt a lot -- and, plus, I'm
 4 just sort of there now in my -- I've grown my
 5 administrative principal wings a little bit more.
 6 We're going to do it. We're going to try this and
 7 we're going to give it a go. We're going to take a
 8 freshman class all the way through it before we
 9 abandon it, and we're going to help our kids in ways
 10 other than just reading, writing, math, science,
 11 social studies. It's meant to be working with kids
 12 outside the core curriculum.

13 **Q. So is one of the purposes of it to try**
 14 **to foster a relationship with between the teacher who**
 15 **is running the advisement and the kids in the**
 16 **advisement?**

17 A. Yes. And so the teacher will stay with
 18 that advisement group all the way until they graduate.
 19 So the ones that have seniors right now will come back
 20 and pick up freshmen next year and stay with them for
 21 four years. So it's a little family within the
 22 Arapahoe family. And so not only a relationship with
 23 the teacher with those kids but also the kids
 24 themselves. So, again, just trying to create a
 25 greater sense of community within Arapahoe.

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1 **Q. All right.**

2 A. And the topics aren't specific. We
 3 didn't purchase a curriculum for it. We really want
 4 it to be timely. For example, if we would have had an
 5 advisement session scheduled prior to our homecoming
 6 dance, I would have done our -- you probably saw on
 7 the news.

8 **Q. I heard.**

9 A. -- no grinding policy that we put in
 10 place. An advisement would have been a perfect place
 11 for that to be taught to our kids. So that's one
 12 example.

13 **Q. All right. How big are the advisement**
 14 **groups?**

15 A. They're 23 to 25 students to a teacher,
 16 so they're smaller than the average class size.

17 **Q. All right. And I understand it's only**
 18 **been in place for a couple of months, but --**

19 A. We only have had one.

20 **Q. -- what are the early reports? What are**
 21 **you hearing? What's the feedback so far?**

22 A. It's mixed. It's definitely mixed. The
 23 first one was really just a chance to get to know our
 24 little groups; and we did some tiny team building
 25 things, talked about what it's like to work in

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1 isolation versus when you actually can work with
 2 someone, so the idea of collaboration. The next one
 3 is going to be in November, couple weeks, the 18th --
 4 the 19th, November 19th. And we're going to
 5 differentiate a little bit with freshman, sophomores,
 6 junior, and seniors but talking about, you know, the
 7 anniversary of the shooting and what's that going to
 8 be like at Arapahoe because we have these two groups
 9 of kids that were not there when it happened and yet
 10 we have two more groups that were there when it
 11 happened and a greater majority of our staff that was
 12 there when it happened and just really talking about
 13 what that kind of has been -- what to expect with us,
 14 what that's like, and how we are moving towards and
 15 through it again this year with the deliberate acts of
 16 love and kindness and kind of brainstorming within the
 17 groups what -- what they could do as an advisement
 18 group. And I haven't seen the exact curriculum
 19 planned for that day or the lesson plan for that day,
 20 but that's the idea of it. Also, with freshmen, a
 21 little bit of prep for final exams coming up and
 22 things like that, so trying to differentiate a little
 23 bit. We got that feedback from seniors, in
 24 particular. They want to do what's good for seniors,
 25 and they feel -- some of them feel like why are we

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1 doing this our last year. I already know teachers. I
 2 already feel comfortable. That's some of the negative
 3 side of it.

4 **Q. Sure.**

5 A. But we're still going to hold them to
 6 it. They're still going to be required to go. I
 7 don't know if that gives you enough about it. And
 8 it's still new.

9 **Q. Understood.**

10 A. We'll evaluate as we go.

11 **Q. A couple other things I wanted to touch**
 12 **on in terms of what happened after the shooting. I've**
 13 **heard from a number of witnesses that faculty was**
 14 **discouraged from talking about the events that led up**
 15 **to the shooting and about the shooting itself. Do you**
 16 **know anything about that?**

17 A. Not really. Short of cooperating with
 18 investigators, it's an ongoing investigation, those
 19 were the kinds of things we heard from, you know, the
 20 sheriff's office. And we -- I feel like we talked a
 21 lot. We met a lot as a faculty. We met a lot as an
 22 administrative team. The district was extremely
 23 helpful in helping us move through. I'm not sure what
 24 that's in reference to specifically.

25 **Q. Well, and I've got Tracy Murphy's**

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1 **deposition in front of me; but I heard it in more than**
 2 **one, that there was an overt or covert message from**
 3 **central administration to not talk about this, the**
 4 **shooting or the events leading up to it, among**
 5 **ourselves.**
 6 A. I didn't hear that message. I did not
 7 get that from central administration at all.
 8 **Q. All right.**
 9 A. The only thing I even remember talking
 10 about with staff was whatever you say, just be
 11 prepared to have it go in the media. That's all --
 12 that was always -- and whatever you send via e-mail,
 13 it's going to be -- just know the media has access.
 14 It's public information. But not to not talk about
 15 it, unless there were people that were told that by
 16 investigators. That's not -- I did not get that
 17 message from central administration, nor did I feel
 18 like that was the message.
 19 **Q. Well, here is -- in Mr. Murphy's**
 20 **deposition, I asked the following question and here's**
 21 **the answer I got: "What about within the Arapahoe**
 22 **building, the teachers, the staff, and the**
 23 **administrators there? Was there also an overt or**
 24 **covert message not to talk about what had happened on**
 25 **December 13?" That's the question I asked him,**

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1 **specific to your building. And his answer was, "Yeah,**
 2 **there was."**
 3 A. I don't know.
 4 **Q. Where would that be coming from?**
 5 A. I'd have to ask him. I don't know. I
 6 don't know why he felt that way. I don't know why.
 7 I -- honestly, I don't know. I can't answer that.
 8 MR. ROCHE: Let's go ahead and mark this
 9 as Exhibit 53.
 10 (Deposition Exhibit 53 was marked.)
 11 **Q. (BY MR. ROCHE) Now, I'm going to guess**
 12 **you have not seen Exhibit 53 but I'll ask the**
 13 **question. Do you recognize Exhibit 53?**
 14 A. I do not. I recognize a name, Steve
 15 Johnson. I know who that is.
 16 **Q. Okay. And he was one of the**
 17 **investigators who was active in looking into the**
 18 **circumstances surrounding the shooting at Arapahoe,**
 19 **right?**
 20 A. Yes.
 21 **Q. Oh, one housekeeping. Did you ever give**
 22 **a statement to the investigators?**
 23 A. I did not.
 24 **Q. That's what I thought. I just wanted**
 25 **to --**

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1 A. I always thought that was odd.
 2 **Q. -- double-check that.**
 3 A. No. They never asked me for one.
 4 **Q. Okay. On page 2 of this supplemental**
 5 **report from the CBI, there's a description of some**
 6 **actions that the investigators took. Do you see that?**
 7 A. Up, top, down?
 8 **Q. This page.**
 9 A. Sorry.
 10 **Q. That's all right. And at the bottom of**
 11 **the page, there's a description of a visit to the**
 12 **school on December 18th, very bottom paragraph.**
 13 A. Yes.
 14 **Q. Do you see that?**
 15 A. Yes.
 16 **Q. At the bottom of that paragraph, the**
 17 **investigator reports that he learned that school**
 18 **officials and teaching staff were upset that law**
 19 **enforcement personnel were on scene at the school. Do**
 20 **you remember that day?**
 21 A. It's fuzzy, but I do. I mean, I can
 22 take myself back there and I do remember that.
 23 **Q. All right. And that was the first day**
 24 **that teachers were back at school; is that right?**
 25 A. I feel like I'd have to look back at my

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1 calendar. I think we brought them back on the 18th
 2 and 19th with kids. I think that's right.
 3 **Q. And what can you tell me about school**
 4 **officials and teachers being upset that law**
 5 **enforcement was on scene?**
 6 A. I remember several teachers feeling why
 7 do they have to do this right now. We're just barely
 8 getting back in here. Let these kids come back in.
 9 Let them get their stuff. You know, if they need to
 10 talk to us, why can't they do it another time, that
 11 kind of thing. They were emotional right then, you
 12 know, wanting to get back in there and not -- not be
 13 pulled away and questioned. And it was scary, I
 14 think, for a lot of them and very uncharted territory.
 15 **Q. Understood. Did you have any**
 16 **conversations with the investigators to let them know**
 17 **that you were upset about their being there?**
 18 A. No, I don't think I did specifically. I
 19 didn't feel like I could.
 20 **Q. All right.**
 21 A. It was a very gray area for me.
 22 **Q. All right. Well, let's look at the next**
 23 **page; and it mentions an initial briefing. And then**
 24 **it goes on to explain, "It was determined that law**
 25 **enforcement would not actively contact school staff."**

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1 **Was that a request that either you or the district**
 2 **personnel made of law enforcement?**
 3 A. They might. Not me specifically, but I
 4 might have asked for support from -- I don't know who
 5 made the communication directly with them. It could
 6 have been district support. I'm not sure.
 7 **Q. All right. Well, do you remember who**
 8 **made the decision to direct all the law enforcement**
 9 **personnel to stand by in the school auditorium?**
 10 **That's the next line of the report there.**
 11 A. I remember us deciding that -- what do
 12 you call it -- victim's assistance people were going
 13 to station in the auditorium, but I don't know -- I
 14 don't feel like I would have had any jurisdiction for
 15 the CBI, nor would anyone at the district, I don't
 16 think. I don't remember how that decision was
 17 reached. Maybe a compromise -- I don't know -- in
 18 response to the staff being nervous about it. Anxious
 19 is a better word about it.
 20 **Q. The report goes on to indicate that,**
 21 **"School staff were reportedly asked to check in with**
 22 **law enforcement prior to leaving for the day." Do you**
 23 **see that? The very next line of that top paragraph.**
 24 A. I don't see it. Sorry.
 25 **Q. That's okay. It's right after the line**

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1 **about the auditorium. It says, "The school staff were**
 2 **reportedly asked to check in with law enforcement**
 3 **prior to leaving for the day."**
 4 A. Right there, however they left without.
 5 **Q. "The school staff." Do you see where**
 6 **I'm talking about?**
 7 A. No one ever told me that all staff were
 8 supposed to check in with law enforcement personnel
 9 before they left the school. I didn't even check in
 10 with law enforcement. That message did not get
 11 conveyed to me. The staff are cooperative people.
 12 They would have done it if they were supposed to do
 13 it.
 14 **Q. Well, and the reason I'm asking is**
 15 **because the next two lines of this report indicate**
 16 **that the law enforcement was in the auditorium from 9**
 17 **in the morning until 1:30 in the afternoon and that**
 18 **during that time, not one Arapahoe High School staff**
 19 **member talked to law enforcement.**
 20 A. Yeah, I see that.
 21 **Q. Does that surprise you?**
 22 A. Well, this is news to me. Yes.
 23 **Q. Okay. Do you have any understanding or**
 24 **explanation for how it is that the first day back at**
 25 **the school not one high school -- not one school**

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1 **staffer talked to law enforcement while they were**
 2 **there?**
 3 A. I don't even know that I knew that was
 4 true. I thought people that needed to be talked to
 5 were being talked to, and that seemed to continue for
 6 weeks, months even. Did the sheriff know anything
 7 about it? I don't know, Mike. I don't know. It's
 8 strange.
 9 **Q. Did Arapahoe High School do any kind of**
 10 **a debrief after things calmed down about what went**
 11 **well and what didn't go well? My understanding is**
 12 **there was something done.**
 13 A. Man, I feel like we debriefed
 14 constantly. I guess, more specifically, like what?
 15 There were a lot of debrief conversations, so I don't
 16 know what specifically you're wanting to know about
 17 which things.
 18 **Q. Okay. Well, there's -- as I understand**
 19 **it, there were a couple of things done. I'm going to**
 20 **go ahead and mark two more exhibits because they are**
 21 **what I have on it.**
 22 **(Deposition Exhibits 54 and 55 were**
 23 **marked.)**
 24 **Q. So let's start with this. Do you**
 25 **recognize Exhibits 54 and 55?**

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1 A. I don't know that I've seen the exhibits
 2 themselves. I do know -- I do believe I know where
 3 they came from. Does that make sense?
 4 **Q. Sure. Well, let's start with that. Why**
 5 **don't you tell me -- let's start with 54 and tell me**
 6 **if you know what is it and where did it come from?**
 7 A. I believe this came from my
 8 administrative team retreat in June 2014, which is
 9 when Clay Abla and, I think, Melissa Cooper both came
 10 to our team and talked about these specific -- we were
 11 asked about what worked well, what could be improved.
 12 You can see the breakdown on here.
 13 **Q. Right.**
 14 A. And they called it a hotwash activity.
 15 I haven't seen this part -- or maybe it's a summary.
 16 So I think that's where this came from.
 17 **Q. Do you know who prepared it?**
 18 A. Maybe Clay. I don't know for sure.
 19 **Q. All right.**
 20 A. I don't know. I don't know.
 21 **Q. So tell me about this administrative**
 22 **team retreat.**
 23 A. So every year -- so really the end of
 24 the year, but it's the beginning of the next for us,
 25 we do some planning in preparation for the following

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1 year. And there hadn't been a time prior to that for
 2 Clay to come in and debrief with our team and get kind
 3 of, okay, we did it with the district level
 4 principals, what about -- not district level, but
 5 districtwide principals, what happened across the
 6 district, but we haven't really done this with
 7 Arapahoe. And we were probably in a little bit better
 8 place emotionally at that point to kind of -- so we
 9 asked if he could come into our retreat and do this
 10 activity.
 11 **Q. Okay. And where is that retreat held?**
 12 A. We held it at -- this year, it was at
 13 the -- off-site at the Marriott off of I-25 and
 14 Lincoln.
 15 **Q. All right. Was it a one-day retreat,**
 16 **two-day?**
 17 A. Two-day retreat, but this was a
 18 one-day -- part of our one day -- part of one of our
 19 day's activities.
 20 **Q. And who attends the administrative team**
 21 **retreat?**
 22 A. Principal and assistant principals.
 23 **Q. What about counselors, school**
 24 **psychologists, any of them?**
 25 A. No.

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1 **Q. All right. Now, this retreat happened**
 2 **after the end of the '13-'14 school year; right?**
 3 A. Yes.
 4 **Q. By that point, was it known that Kevin**
 5 **Kolasa would not be returning to Arapahoe?**
 6 A. Kevin was not at that retreat already.
 7 **Q. That's what I was getting at. So Kevin**
 8 **did not attend this retreat?**
 9 A. He did not.
 10 **Q. And this crisis response debrief, to me,**
 11 **seems focused on exactly what it says, which is how**
 12 **did the school respond to the crisis once it happened;**
 13 **right?**
 14 A. Yes.
 15 **Q. And it walks through things that went**
 16 **well and things that could be improved, right?**
 17 A. Right.
 18 **Q. And it does not focus on the events and**
 19 **activities that occurred prior to December 13th; am I**
 20 **right?**
 21 A. Correct.
 22 **Q. Was there a debrief done on the handling**
 23 **of the threat assessment and the handling of Karl**
 24 **Pierson more generally in the days, weeks, months**
 25 **leading up to December 13th?**

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1 A. Say that again.
 2 **Q. Sure. Remember when I told you I was**
 3 **going to ask a bad question and you were supposed to**
 4 **tell me?**
 5 A. Yeah. I think you said that backwards.
 6 But go ahead.
 7 **Q. What I want to know is was there a**
 8 **debrief at the school or district level to evaluate**
 9 **how the school handled Karl Pierson in the days and**
 10 **weeks leading up to the shooting?**
 11 A. Gotcha. That wasn't a bad question. I
 12 didn't hear it right. I would say there were many
 13 conversations about looking backward and what did we
 14 miss and how could this have not happened; and I would
 15 say most of that conversation, specifically though
 16 around the threat assessment, came in the threat
 17 assessment training that we did in February -- March,
 18 February of 2014, which I required all of our mental
 19 health staff at the time, all of our administrators
 20 do; and Nate Thompson came over and gave that to the
 21 whole team, making sure that everyone understood this
 22 process, this threat assessment process, danger,
 23 safety -- danger assessment. It's not just about
 24 threat assessments. It's also about any kind of
 25 bullying and suicide and all of that. So we all got

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1 that training, and I think there was a lot of
 2 conversation around moving forward. If this were to
 3 happen again, what would we do differently. So I
 4 think that was probably the most initial leading --
 5 like leading up to December 13 review, crisis review.
 6 It's not crisis review. Preventative review.
 7 **Q. And that's exactly what I want to --**
 8 **that's the distinction I want to draw is between**
 9 **crisis response and crisis prevention.**
 10 A. Yes.
 11 **Q. So as best you can recall, to the extent**
 12 **there was a debrief on the prevention aspect, it was**
 13 **done in February at the threat or danger assessment**
 14 **training conducted by Nate Thompson?**
 15 A. Yeah, because all of us were in the
 16 room. It was everybody that would be -- would be and
 17 had been involved in any kind of student incident that
 18 year.
 19 **Q. And you said February of 2014, you**
 20 **required all the administrators at the school to**
 21 **attend the threat assessment training?**
 22 A. And mental health staff.
 23 **Q. And mental health staff both.**
 24 A. It was a very crowded room.
 25 **Q. And is that something you require of**

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1 **your administrators and mental health staff annually**
 2 **now?**
 3 A. Yes. In fact, we -- I actually annually
 4 will require it of our whole staff, at least our
 5 teaching faculty, to have the whole overview. And we
 6 did this -- our very first faculty meeting this year,
 7 and that will always be in place for me. It just
 8 will. Additionally, I will be having my classified
 9 staff trained on -- not the whole overview of the
 10 danger assessment, but a bullet point overview of what
 11 that looks like but then also the warning signs, early
 12 and imminent warning signs for all of them.
 13 **Q. All right. As I look through**
 14 **Exhibit 54, there's, obviously, a lot of information**
 15 **on here.**
 16 A. Sure.
 17 **Q. One of the things that looks like was**
 18 **something that worked well was the "practice in the**
 19 **past really helped." Do you see that about midway**
 20 **through the list?**
 21 A. Um-hum.
 22 **Q. That's referring to the lockdown drills,**
 23 **I presume?**
 24 A. Yes. That was a big -- divine
 25 intervention is what I'm going to call it. We had a

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1 lockdown drill in October, I want to say around the
 2 8th or 9th of October that year. We did it like we've
 3 always done it. We, administrators, went around and
 4 checked all the doors and made sure the lights were
 5 off and kids were quiet and out of the way and ran our
 6 drill. And we invited Arapahoe County Sergeant
 7 Rod Pacheco to come observe it with a couple of other
 8 Arapahoe County deputies at the recommendation of
 9 our -- well, I don't know -- I don't know specifically
 10 who brainstormed the idea. But Darrell recommended to
 11 me that we do that. And I said I think that's a great
 12 idea. Let's do it. And James Englert, our SRO,
 13 rounded up a couple deputies and his boss. And
 14 immediately following that lockdown drill, we met in
 15 the conference room. Guy Grace was present, Clay Abl
 16 was present, my team, and the officers that came to
 17 observe the drill. And Rod Pacheco said, That's not
 18 how it's going to happen. You're not going to do that
 19 again. The next time you do a drill, here's how it's
 20 going to be because that's what it's really going to
 21 be like in a real situation. And what was so
 22 different was it was -- everybody, including
 23 administrators, would go into lockdown and Arapahoe
 24 County would come in and check the doors and make sure
 25 that people were out of sight and doing what they were

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1 supposed to be doing.
 2 **Q. All right.**
 3 A. I said, well, if we're going to do that,
 4 that is a big change for my staff and my students.
 5 We've got -- you've got to train them. We need to
 6 talk about it. And he said, I'd be happy to. So we
 7 scheduled him for our next faculty meeting that was
 8 coming, which was sometime in November 19, 20,
 9 somewhere around there. Rod came in, gave a great
 10 presentation, talked about, you know, active shooter
 11 training and any kind of evacuation training, but
 12 specifically on the lockdown drill because the next
 13 time we did a drill, it was going to look this way.
 14 And things like you get out of the way and you get
 15 quiet; and if the fire alarm goes off, what do you do?
 16 You stay put unless you're directed by law enforcement
 17 to do otherwise. And, I mean, sure enough, the fire
 18 alarm went off that day. They knew to stay put. I
 19 mean, that's why I say it's divine intervention.
 20 **Q. Well, and that goes to a point that I**
 21 **wanted to ask you about. Part of why that worked**
 22 **well, the lockdown component of that day, is because**
 23 **the faculty and the students had not just been trained**
 24 **on what to do, but they practiced it; right?**
 25 A. Yes. Well, we didn't -- we had

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1 practiced a lockdown drill in October; but we hadn't
 2 practiced it the way it -- like the one we practiced
 3 this year was more --
 4 **Q. Very different?**
 5 A. -- like, yeah, the real deal.
 6 **Q. All right.**
 7 A. But, yes, I do believe that. And we do
 8 practice lockdown drills every year.
 9 **Q. And I understand that. But what I'm --**
 10 **what I'm getting at is something different, which is**
 11 **do your administrators -- I know that they've now all**
 12 **been trained on how to do a threat assessment. Do**
 13 **they practice them? Do they go through a tabletop**
 14 **exercise?**
 15 A. That's a really good idea. We get
 16 tabletop exercises from the district, and that's a
 17 great idea for one. We are very, very open in our
 18 dialogue and conversation now when people are going
 19 through them, so that, in a sense, is a tabletop
 20 before they get too far into a threat assessment.
 21 It's very much a team effort, even amongst the
 22 administrative team. So do we do tabletops on them,
 23 no; but I love that idea.
 24 **Q. I won't need attribution.**
 25 A. Yeah. We are much more collaborative.

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1 **Q. All right. One of the areas of**
 2 **improvement in the crisis response related to the**
 3 **dispatcher. Do you see that? That's where the**
 4 **redaction is, when somebody called security --**
 5 A. Yes.
 6 **Q. -- to report a shooter and the**
 7 **dispatcher hung up. Do you see that there?**
 8 A. I do see it.
 9 **Q. Do you remember any discussion about**
 10 **that?**
 11 A. I don't. I don't.
 12 **Q. Do you remember anything about that**
 13 **event? I mean, I understand you're not the one who**
 14 **called.**
 15 A. No.
 16 **Q. Okay. And what can you tell me about**
 17 **the last bullet point on the areas for improvement**
 18 **where it says, "Campus security were not following**
 19 **their schedule"? Is that about the doors not being**
 20 **locked?**
 21 A. That might be about the doors not being
 22 locked.
 23 **Q. All right.**
 24 A. And it also might be about the lunch
 25 that day. Never were both of them supposed to be in

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1 an office having lunch together at the same time.
 2 **Q. You're referring to Cameron and**
 3 **Christina?**
 4 A. Yes. So it could be both of those.
 5 **Q. All right. On the next page, there's a**
 6 **discussion of challenges in the months to follow. Do**
 7 **you see that?**
 8 A. Yes.
 9 **Q. And one of those challenges is that the**
 10 **additional security hired was not effective?**
 11 A. No.
 12 **Q. Right?**
 13 A. Yes.
 14 **Q. And I've seen reports about the**
 15 **additional security that spring semester had fallen**
 16 **asleep, playing on their phones, all kinds of stupid**
 17 **things; right?**
 18 A. Yes.
 19 **Q. Is that something you observed or became**
 20 **aware of during that semester?**
 21 A. Yeah. It wasn't as bad as that just
 22 sounded, but it wasn't -- it wasn't as effective as
 23 what we have in place right now.
 24 **Q. Yeah.**
 25 A. It was a challenge, but I was grateful

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1 for the support and the help. There was definitely
 2 more bodies in the building, more eyes, more radios,
 3 walkie-talkie radios.
 4 **Q. And there's been significant changeover**
 5 **in the security personnel even from the spring?**
 6 A. Yes. From this past spring or that
 7 spring?
 8 **Q. From that spring.**
 9 A. Oh, yes.
 10 **Q. Tell me about the remote door lock**
 11 **schedules not being followed or set by the security.**
 12 A. It's a challenge. It continues to be a
 13 bit of a challenge and something we're very much aware
 14 of and they take care of it immediately when we report
 15 a problem. We have some doors in our building that
 16 are remotely locked by the district office, and --
 17 which is good and bad. So I'd say there's more good
 18 about that than not because they can lock something up
 19 for us at a moment's notice, and they have cameras on
 20 the outside of the building which can be very helpful.
 21 But we also have a six-period day, and students do
 22 need to access certain doors during the day. For
 23 example, the north cafeteria door that leads out to
 24 the patio, kids have to get to the portable
 25 classrooms. So sometimes those -- and I don't know

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1 why. It could be a power surge. I don't know what
 2 trips them, but sometimes they will be wrong and
 3 they'll be either unlocked or locked at the wrong
 4 time; and so that's what that's referring to.
 5 **Q. Are the doors alarmed now?**
 6 A. The only door that I'm aware that will
 7 go off -- we can hear it in the building -- is the one
 8 we put in in the back of the library.
 9 **Q. All right.**
 10 A. I do not know if Guy Grace or his folks
 11 hear any kind of an alarm if our doors are unlocked.
 12 **Q. All right. And then the next section of**
 13 **Exhibit 54 walks through some of the measures that the**
 14 **school took in the spring of 2014 to improve school**
 15 **safety, right?**
 16 A. Um-hum.
 17 **Q. Stricter door lock schedule, right?**
 18 A. Yes. And that's even stricter now. I
 19 mean, it's evolved since this document was written.
 20 **Q. All right. We talked about**
 21 **walkie-talkies to all staff with hall duty?**
 22 A. That's brand new.
 23 **Q. Does that include teachers?**
 24 A. That is teachers. So all of our campus
 25 supervisors, all of the administrators, now all of the

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1 counselors and school psychs. So that's -- six,
 2 seven -- eight more people with walkie-talkies. It's
 3 also now the hall duty, the roaming hall duty teacher
 4 every period every day.
 5 **Q. Right. And then the rest of these are**
 6 **pretty self-explanatory except for car traffic on**
 7 **north side. What does that refer to?**
 8 A. It might refer to the ramp, but we've --
 9 this fall we fixed that.
 10 **Q. Okay. What was the --**
 11 A. So there's a ramp in the back that cars
 12 could easily drive up, and we have put a chain across
 13 it. That was the best way, I guess, we could at that
 14 point to stop cars from driving up there. And if they
 15 drove up there, they drove right to the north
 16 cafeteria door or they could drive across the grass
 17 and get to the library even. So we put -- the
 18 district put a permanent stop sign, a bigger stop sign
 19 there and then a little railing to stop cars from
 20 going up there. And then we put a big -- an Eagle
 21 Scout project -- a boy was looking for an Eagle Scout
 22 project, and we were looking for a nice way to put
 23 some big rocks in front of the library, and he built a
 24 beautiful area out there. So there's trees and big,
 25 big rocks that a car wouldn't be able to drive

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1 through.
 2 **Q. All right.**
 3 A. So that might be what that's referring
 4 to.
 5 **Q. All right. And then the last thing in**
 6 **the measures taken to improve school safety is you're**
 7 **going to do threat assessments on more students and**
 8 **when in doubt do a threat assessment. Do you see**
 9 **that?**
 10 A. Yep.
 11 **Q. And certainly the numbers bear that out?**
 12 A. Yes.
 13 **Q. Were any written criteria developed to**
 14 **decide when it was appropriate to do a threat**
 15 **assessment?**
 16 A. Not -- not at Arapahoe; but Nate
 17 Thompson, I think, has done a good job revising the
 18 district threat assessment process and has taught us
 19 more through the training. This year, I think, has
 20 been the best it's ever been. So not specifically at
 21 Arapahoe, but we followed the district's written ...
 22 **Q. Right. And I understand that the**
 23 **guidance on how to perform a threat assessment --**
 24 A. It also includes when.
 25 **Q. Okay.**

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1 A. Yeah.
 2 **Q. And then as we walk through this**
 3 **document, it talks about resources/support needed. Do**
 4 **you see that?**
 5 A. Um-hum.
 6 **Q. And one of the bullet points there**
 7 **simply says "administrative support." What does that**
 8 **refer to?**
 9 A. Well, when I started at Arapahoe
 10 High School, I was one of five assistant principals.
 11 We now have four. We also had a dean of students and
 12 a principal. So there were, what -- four, five,
 13 six -- seven of us on the administrative team. We're
 14 down to five.
 15 **Q. All right.**
 16 A. I don't have a dean. If I need to add a
 17 dean or I need to add an administrator, I need to take
 18 that out of my teaching staffing; so I haven't done
 19 that. I will say it has been helpful to
 20 administration to add the mental health support.
 21 That's certainly been helpful, and I'm very grateful
 22 for that support we've gotten from the district. But
 23 we have 2180 students at Arapahoe High School this
 24 year. A bit of a long story and I can off the record
 25 tell you why we're a little high. We should be at

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1 2150. We -- it's the most we've had. So we certainly
 2 haven't lost students, and yet we have no more
 3 administrative support. And that's systemwide.
 4 **Q. So that's a reference to we need more**
 5 **administrative personnel?**
 6 A. Yes.
 7 **Q. All right. Take a look at the last page**
 8 **of Exhibit 54, if you would. And this page is titled**
 9 **"Continuous Improvement," right?**
 10 A. Yes.
 11 **Q. And it describes the steps that**
 12 **Littleton Public Schools has taken since December of**
 13 **2013 for continuous improvement in the area of danger**
 14 **assessment, correct?**
 15 A. Yes.
 16 **Q. Are you familiar with this page of**
 17 **Exhibit 54? Have you seen that before?**
 18 A. I might have. None of this looks new to
 19 me, but I don't know that I've seen it in a nice
 20 little document like this. I may have.
 21 **Q. And the reason I ask is, obviously,**
 22 **these are numbered sequentially. But the first two**
 23 **pages are dated June of 2014, and this page talks**
 24 **about things that happened in August and October of**
 25 **2014. Do you --**

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1 A. Am I looking at the same --

2 **Q. Yeah, you're looking at the right thing.**

3 A. Okay. I also see February of 2014.

4 **Q. Right. And then if you follow it down,**

5 **it talks about August of 2014, October of 2014.**

6 A. Yes, yes, yes. I see where you're

7 looking.

8 **Q. And I'm just -- for starters, I'm**

9 **wondering if these documents go together or if you**

10 **know if this goes with --**

11 A. I think that this is Arapahoe

12 High School specific. I think this is a combination

13 of, perhaps, this and this and this is district

14 generated. That would be my --

15 **Q. Okay.**

16 A. -- best guess looking at this because we

17 did do a -- I don't know where the term comes from,

18 but a hotwash debrief with the whole secondary

19 principal team that Clay Abila led us through as well.

20 **Q. And you're talking now about Exhibit 55?**

21 A. Yeah.

22 **Q. All right. Well, we'll get -- I do want**

23 **to hear about that. Let's talk about the last page of**

24 **Exhibit 54, if we could. The first bullet point talks**

25 **about reviewing the LPS danger assessment procedures**

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1 **with AHS administrators and mental health team.**

2 **That's the February training we talked about?**

3 A. Yes.

4 **Q. Okay. The next item on there is a**

5 **discussion of the threat assessment process and FERPA**

6 **with the faculty. Is that a different meeting?**

7 A. Yeah. That was at the faculty meeting

8 where I talked about how I needed to get straight on

9 my FERPA need-to-know information.

10 **Q. All right. And that was a meeting with**

11 **all of the teachers as well?**

12 A. That was everybody.

13 **Q. And that was where you announced or**

14 **implemented we're going to be much more open in how we**

15 **share information?**

16 A. Yes.

17 **Q. And then sometime thereafter, the**

18 **district backed you off of that a little bit?**

19 A. A little bit, but they were also very

20 supportive in giving us the teacher tab and that kind

21 of thing.

22 **Q. Right. Then there was a presentation**

23 **with Dr. Nicoletti and others, right?**

24 A. I see that. I didn't --

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

183

1 A. I don't think I attended that.

2 **Q. I don't think you did either. That was**

3 **an administrative review of threat assessment**

4 **protocols; and Clay Abila, Guy Grace, and some other**

5 **folks were there but you were not there?**

6 A. Yeah, I don't think so.

7 **Q. All right. Did anybody tell you what**

8 **the outcome of that administrative review was?**

9 A. I don't know specifically if I have been

10 told that.

11 **Q. And then one of the other things that**

12 **the school has done is it -- or the district has done**

13 **is it implemented weekly district danger review and**

14 **data monitoring meetings?**

15 A. Yes.

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

17 A. Yes.

18 **Q. Have you been a part of those?**

19 A. Not a part of them, but I'm very

20 grateful they're doing them.

21 **Q. All right. What about the next item on**

22 **there, the formal district level danger review**

23 **process?**

24 A. The next bullet point? Oh, yes.

25 **Q. Yes.**

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1 A. Yes, I've been a part of at least one --

2 two of them, actually.

3 **Q. All right. And what -- what are those**

4 **district level danger review processes?**

5 A. It's really the same process that we do

6 at the district, but when we are -- I mean, at the

7 school. But when we feel it's potentially going to

8 end up on the high end, we've asked Nate Thompson to

9 step in and lead it. And Guy Grace is usually present

10 at that along with the building -- the same building

11 level personnel that we have, including teachers; but

12 it's held at the district office, sort of raises the

13 whole environment for everyone.

14 **Q. All right. And would the student and**

15 **the parents also go over to the district, Crocker**

16 **building, and participate in that meeting?**

17 A. Yes.

18 **Q. Okay. The next bullet point talks about**

19 **gathering feedback from principals and staff. I'm**

20 **assuming that's Exhibit 55?**

21 A. I'm not sure. It says regarding --

22 **Q. Oh, no, I'm sorry. I don't think it is,**

23 **actually --**

24 A. -- the threat assessment process.

25 **Q. You're right. Do you recall the**

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1 **district gathering feedback from you and your**
 2 **administrative staff on the threat assessment process**
 3 **in September of 2014?**
 4 A. Ask that one more time.
 5 **Q. Sure. Do you recall LPS gathering**
 6 **feedback from you and your staff about the threat**
 7 **assessment process in the fall of 2014?**
 8 A. I recall Nate Thompson helping me create
 9 a survey for my staff that they completed in small
 10 cross-departmental groups on our October in-service
 11 day. I think that's when we gave it. And there may
 12 have been threat assessment process questions on that
 13 where they would have gotten feedback from the whole
 14 staff, but I think the majority of the threat
 15 assessment feedback would have come from the mental
 16 health staff and administrators who primarily are
 17 leading that work.
 18 **Q. Do you recall seeing what feedback you,**
 19 **your mental health and administrative staff provided**
 20 **as part of that process?**
 21 A. I don't remember seeing that
 22 specifically. That doesn't mean I didn't.
 23 **Q. Do you recall giving any feedback on the**
 24 **threat assessment process in the fall of 2014 to the**
 25 **district?**

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1 A. I gave a lot of feedback. Yes, I do.
 2 And they are very -- they listen all the time to me
 3 and my feedback.
 4 **Q. All right. Well, tell me what your**
 5 **feedback was on the threat assessment process in the**
 6 **fall of 2014?**
 7 A. I don't remember specifically what I
 8 said at that time. I -- like I said, way back, I
 9 wanted an immediate understanding of the threat
 10 assessment process as soon as February of 2014; so I
 11 feel like the more I'm trained on that process, the
 12 more my people are trained on the process, the better
 13 we're going to get at using it and using it
 14 consistently and fairly with kids. So I think we're
 15 getting better. I think that Nate has gotten better
 16 at communicating who needs to be trained. For me,
 17 though, I'm not going to be comfortable for a long
 18 time, if ever, not just annually getting everyone
 19 trained, mental health and administration. I don't
 20 remember specifically in September of 2014 what my
 21 feedback was, but that's generally the gist of it.
 22 That's probably the main things that I talk about.
 23 **Q. Well, do you remember discussing any**
 24 **problems or shortcomings that you observed in the**
 25 **threat assessment process as part of that whole**

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1 **feedback process?**
 2 A. Well, short of me not being involved
 3 more, more direct expectations for training, more
 4 thorough training would be -- that's a shortcoming.
 5 **Q. Did you have concerns -- Sorry. Go**
 6 **ahead and finish.**
 7 A. I guess I'm not quite sure what you're
 8 asking.
 9 **Q. Well, did you have concerns that the**
 10 **threat assessments that were being done in your school**
 11 **weren't being done as thoroughly or comprehensively as**
 12 **you would have liked to see?**
 13 A. Not any longer, not after we had that
 14 training in February.
 15 **Q. No. But prior to that.**
 16 A. We didn't have very many. So the only
 17 one I had been even a part of was my first year as
 18 principal, so I don't even know -- I never had one as
 19 an assistant principal, so I don't know. I don't know
 20 enough. Ron Booth maybe would know.
 21 **Q. All right. Do you recall how or whether**
 22 **that feedback was assembled by the district?**
 23 A. I don't know how they did it.
 24 **Q. Did you ever see any reports on that**
 25 **feedback process from all the principals and staff on**

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1 **the threat assessment process?**
 2 A. I don't know. I know Nate came to the
 3 high school principals recently and asked us -- shared
 4 with us the latest overview of the process and
 5 expectations; but I don't know. Maybe if I saw what
 6 you were talking about, I might remember seeing it.
 7 **Q. Well, candidly, I'm not sure because**
 8 **I've got Exhibit 17, which is an administrative review**
 9 **of the LPS threat assessment process, and it's in the**
 10 **first binder.**
 11 A. Do I have it?
 12 **Q. Yeah, it's Exhibit 17.**
 13 A. Yeah, it looks like second binder for
 14 me.
 15 **Q. Oh, is it? Then --**
 16 A. I end at 16.
 17 **Q. Yeah, there you go. It's the very first**
 18 **one in that book. So I have this.**
 19 A. This whole thing?
 20 **Q. Yeah. But I don't know whether or not**
 21 **that is the feedback that's described in this bullet**
 22 **point that we're talking about in Exhibit 54. So**
 23 **that's my question. Is Exhibit 17 what you believe is**
 24 **referred to in Exhibit 54, or do you know?**
 25 A. I don't know. But it looks like it

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1 might be because of the names, but I don't know. I
 2 bet it was shared with the mental health. It's called
 3 SMHAC, safety and mental health committee, advisory
 4 committee maybe.
 5 **Q. Have you seen Exhibit 17 before?**
 6 A. I don't think so.
 7 **Q. All right. Going back to Exhibit 54,**
 8 **there's a bullet point that talks about a threat**
 9 **assessment review and Q/A session with Arapahoe**
 10 **faculty in November of 2014 led by Nate Thompson and**
 11 **the AHS administrative and mental health teams. Do**
 12 **you see that? It's the second to the bottom.**
 13 A. Yeah.
 14 **Q. Do you remember this threat assessment**
 15 **review and Q/A session? It would have been about a**
 16 **year ago.**
 17 A. I know poor Nate has had to talk to my
 18 staff a lot. Kind of. Nate has been in front of my
 19 faculty a lot, and I know we did it again this fall;
 20 so I am probably blurring sessions together.
 21 **Q. All right. Well, my first question is,**
 22 **do you know, is this a reference to something other**
 23 **than annual training on threat assessments?**
 24 A. No. It probably was just another
 25 opportunity to make sure everybody understood the

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1 process, saw the paperwork, knew what to do, knew how
 2 to report. I'm sure he reviewed imminent and early
 3 warning signs again with them, just giving staff an
 4 opportunity with their heads a little more clear in
 5 the fall of 2014 to remember responsibility in
 6 reporting, that kind of thing.
 7 **Q. All right. Let's look at Exhibit 55.**
 8 **And Exhibit 55 is the districtwide, essentially,**
 9 **principal feedback on how the crisis response process**
 10 **worked; right?**
 11 A. That day. I think it's more like the
 12 top part of the other document.
 13 **Q. Right.**
 14 A. And I think, if I remember right, it's
 15 just middle and high.
 16 **Q. No. It's got Arapahoe as well. It's --**
 17 A. Yeah, middle and high.
 18 **Q. Oh, I'm sorry.**
 19 A. Secondary schools. Sorry. I don't
 20 think elementary principals were with us. Yeah, they
 21 weren't.
 22 **Q. And for Arapahoe High School, there was**
 23 **only two things that were listed as what needs to be**
 24 **changed. Do you see that? One is sub training and**
 25 **the other is the phone system and with a question**

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1 **mark.**
 2 A. Yeah, I wasn't given a ton of
 3 opportunity at that meeting to share because I think
 4 they were doing it separately with our team.
 5 **Q. All right.**
 6 A. It was all the secondary principals. I
 7 think it was more of the district seeking information
 8 for, okay, what if this happens somewhere else; and I
 9 probably went close to the end.
 10 **Q. All right.**
 11 A. Maybe other people said what I needed to
 12 say as well.
 13 **Q. Perfect.**
 14 A. I also wasn't there, so my feedback at
 15 that point maybe wasn't as good as it would have been
 16 with my whole -- in my whole administrative team.
 17 **Q. All right. I want to take a break here**
 18 **in just a minute. But when you say you weren't there,**
 19 **what --**
 20 A. At the -- on the 13th.
 21 **Q. Okay.**
 22 A. They were looking at -- they were
 23 talking about when Newton -- the SRO left to go over
 24 to Arapahoe that day.
 25 **Q. Okay.**

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1 A. So my feedback that day was not as --
 2 **Q. Sure. No, I understand.**
 3 MR. ROCHE: All right. Let's go ahead
 4 and take a quick break.
 5 (Recess taken, 3:00 p.m. to 3:21 p.m.)
 6 **Q. (BY MR. ROCHE) We've talked about**
 7 **Exhibits 54 and 55 which dealt with the response to**
 8 **the events of December 13th, right?**
 9 A. Yes.
 10 **Q. And you mentioned -- or drew a**
 11 **distinction between that debrief and whether there was**
 12 **a debrief on the crisis prevention efforts, right?**
 13 A. Yes.
 14 **Q. So I want to talk now about that**
 15 **component and whether there was a debrief either at**
 16 **Arapahoe or on a districtwide level on the efforts**
 17 **that occurred to try to prevent the shooting and the**
 18 **handling of Karl Pierson.**
 19 A. Well, I don't think that it was
 20 necessarily -- or that we've had specifically going
 21 backwards in time and trying to prevent it, but in
 22 moving forward talking about changes in either
 23 practice or process to prevent it again ever from
 24 happening, so learning from what we've gone through.
 25 And I would say that's ongoing and continuous

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1 conversation.

2 **Q. All right. Well, and, again, I'm**

3 **obviously, sort of basing some of these questions on**

4 **what we've been looking at in Exhibit 54 which talked**

5 **about what went well and what didn't go so well, what**

6 **needs to be improved; and that's what I want to find**

7 **out, about all of the things that went on before**

8 **December 13th. So what in the crisis prevention**

9 **efforts prior to December 13th do you think went well**

10 **and what didn't go so well?**

11 A. Well, I think I didn't get involved in

12 Karl enough. Like I said earlier, I don't know if

13 that would have changed anything; but I will never

14 know that now. So I, in moving forward, have been

15 involved to a much greater extent, sometimes all the

16 way through the process, with kids that have been --

17 some through the formal threat assessment process,

18 others just through discipline; much more open

19 dialogue with everyone from me to my assistant

20 principals to us as a team together, assistant

21 principals working with counselors, working with

22 teachers, just continuing that conversation of opening

23 up dialogue.

24 I don't -- I don't know that we did that

25 particularly well erring on the side of protecting the

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1 kid, their rights, their family's rights, whatever was

2 the thinking at the time. We do that better. Still

3 not perfect, but better now. Crisis-wise, I fully

4 believe in doing the drills and the training and

5 continuing that. I do think that that went well that

6 day for the most part. I feel like I've talked about

7 a lot of these things already.

8 **Q. Well, and we have talked about a lot of**

9 **the changes that have been made at Arapahoe since**

10 **this; and I understand that certainly some of those**

11 **changes were made in recognition of the fact that**

12 **things could be and needed to be improved in the**

13 **threat assessment and crisis prevention process. One**

14 **of the big questions that I've had throughout this**

15 **process is what about the follow-up or monitoring that**

16 **happens with a kid who is in crisis? Because, to me,**

17 **that's one of the shortcomings here is --**

18 A. Well, and that's -- Sorry.

19 **Q. That's all right.**

20 A. Go ahead.

21 **Q. Karl Pierson was a student in crisis,**

22 **and there was a threat assessment done. There was one**

23 **follow-up meeting and that was it. That's what I see.**

24 **Now, you can agree or disagree with that. But one of**

25 **the things that strikes me is there needs to be more**

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1 **follow-up. There needs to be more contact with the**

2 **student and the parent after there are signs that the**

3 **student is in crisis. Is that something that you**

4 **agree with?**

5 A. Well, I guess you're explaining more

6 thoroughly what I mean by I wish I would have been

7 more involved. I think following up from my level

8 with each of my APs, and quite possibly also myself,

9 to the psychologist or the counselor, whichever --

10 it's typically going to be a psychologist if it's a

11 threat assessment and maybe a counselor, but to follow

12 up with at least the administrator and push a little

13 harder and hold them more accountable for more

14 feedback for me, keep me in the loop, what's being

15 done, are you following up. We're doing that now.

16 **Q. Following up with the student and the**

17 **parents?**

18 A. Absolutely, the students, the parent,

19 the plan. What's the plan with that kid? In my

20 opinion, they never really get off of a threat

21 assessment plan once they're on one. You should

22 always continue monitoring the kid. So a shortcoming

23 I would hold myself accountable for is not following

24 up enough.

25 **Q. Okay.**

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1 A. And expecting Kevin to do the same and

2 Esther to do the same and all the way down the line.

3 I mean, it's something I've learned for sure.

4 **Q. Have you had any conversations with**

5 **either Kevin or Esther about any of the concerns that**

6 **you have with how they handled this situation since**

7 **the shooting?**

8 A. I think right after they both at

9 separate times had kind of racked their brains about

10 what they would have or could have or should have done

11 differently. And at the end of the day, I think they

12 both did the best that they knew how to do. You know,

13 it wasn't enough. The process itself didn't work. We

14 didn't identify him as a danger. Clearly, it wasn't

15 just us that didn't identify him as a danger. I mean,

16 his parents didn't see it. His psychologist didn't

17 see it. I mean, so I think there were a number of

18 people that missed it with this kid. So I don't know

19 that they -- I didn't criticize them, if that's what

20 you mean, after the fact.

21 **Q. Well, in part, that is what I mean.**

22 **We'll use Kevin Kolasa as an example. Since the**

23 **shooting, you've heard from multiple members of your**

24 **faculty that they were unhappy with how seriously**

25 **Kevin Kolasa took Karl Pierson's behavioral issues;**

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1 **right? You heard it from Tracy Murphy, right?**
 2 A. I heard it from Tracy after the fact.
 3 **Q. And I'm talking about after the fact.**
 4 **You heard it from Tracy Murphy, right?**
 5 A. Yes.
 6 **Q. Heard it from Mark Loptien?**
 7 A. No.
 8 **Q. Okay. Heard it from Vicki Lombardi?**
 9 A. Yes.
 10 **Q. And you heard at least that Kevin Kolasa**
 11 **had told James Englert that Karl's incident with Tracy**
 12 **Murphy was no big deal, right?**
 13 A. According to what you shared with me
 14 today from Tracy's deposition. It seems very out of
 15 character for Kevin Kolasa to have said that, so I can
 16 only go by what you're telling me. I don't -- Kevin
 17 never talked like that to me about Karl. So Kevin is
 18 a pretty nice guy. Like I can't imagine -- and likes
 19 kids. I can't imagine him -- he backed Tracy so much
 20 in supporting him with removing him from the team and
 21 all that. I don't know. I don't know what's true. I
 22 don't know what's rumor.
 23 **Q. Well, did you do anything to investigate**
 24 **it? I mean, what I'm getting at is why -- my**
 25 **understanding is nobody was disciplined at Arapahoe as**

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1 **a result of anything associated with this threat**
 2 **assessment process or Karl Pierson. Kevin Kolasa**
 3 **wasn't. Esther Song wasn't. Nobody was, right?**
 4 A. Right. Disciplined, no. There was no
 5 discipline given out to anyone.
 6 **Q. Well, and I guess my question is, given**
 7 **that you had multiple faculty members who were**
 8 **disappointed in Kevin Kolasa's handling of this, why**
 9 **wasn't he disciplined in any way?**
 10 A. I don't know specifically what he would
 11 be disciplined for. He -- I'm sure he learned, and
 12 I'm sure he handles things differently; but he also
 13 doesn't work at Arapahoe. So I don't have contact
 14 with Kevin.
 15 **Q. Was he asked to leave Arapahoe or**
 16 **encouraged to leave Arapahoe?**
 17 A. Oh, absolutely not. No, he wasn't. And
 18 had he been part of the debrief conversation here,
 19 maybe things would have come out that I now know that
 20 I didn't know then. Certainly training and continual
 21 improvement is always at the heart of what we do as an
 22 administrative team. But I didn't have much contact
 23 with Kevin after the fact. One semester and that was
 24 managing through crisis. It just didn't really come
 25 up to discipline him. And the same thing happened

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1 with Esther. She left right after school ended.
 2 **Q. Same question with Esther. Was there**
 3 **ever any consideration given to whether she should be**
 4 **reprimanded for the mistakes that she made in the**
 5 **threat assessment she did of Karl Pierson?**
 6 A. Well, and I don't know all of the
 7 mistakes -- or I didn't know all of the mistakes. The
 8 big one that was probably most evident is Nate,
 9 sharing that. It should have gone to her -- to him.
 10 She should have shared the threat assessment with him.
 11 She knows that that was wrong. There was also
 12 investigation happening and not knowing, you know,
 13 what was going to come out in the sheriff's report,
 14 what was the -- what were the answers. No one really
 15 knew what people said in their conversations with the
 16 investigators, except for what people shared to one
 17 another and then rumors take off and it's hearsay. So
 18 I don't -- I don't know that we knew everything that
 19 we know now about mistakes that anyone made.
 20 **Q. All right. Same question with respect**
 21 **to Esther. Was she asked or encouraged to move to a**
 22 **different school?**
 23 A. No, she wasn't. She wanted -- she came
 24 to me and said she wanted to get back to Cherry Creek
 25 and an opportunity had opened up.

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1 **Q. All right. And it's my understanding**
 2 **that Nate Thompson participated in all of the threat**
 3 **assessments that were done in the spring of 2014,**
 4 **right?**
 5 A. I would probably have mandated that at
 6 that point because it was not something we could
 7 manage on our own.
 8 **Q. Okay. And do you recall why you asked**
 9 **Nate to participate in all of the threat assessments**
 10 **that were done at Arapahoe in the spring of '14?**
 11 A. I think just our -- our own mental
 12 capacity at that point. We needed some support, and
 13 we had a lot of kids in crisis and staff in crisis;
 14 and I would have just wanted him there to help make
 15 sure that we were thinking straight and doing things,
 16 as I said, fairly and correctly. I still contact Nate
 17 every time we go to go into one to make sure we're
 18 doing the right thing; and, oftentimes, he'll
 19 volunteer to come be a part of it. And sometimes he
 20 does and sometimes he doesn't.
 21 **Q. All right. I know this is going to**
 22 **cover some ground that we've already covered, but I**
 23 **think this is candidly probably the most important**
 24 **part of the deposition. What are the lessons that you**
 25 **think are important to be learned from what happened**

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1 **at Arapahoe High School in December of 2013?**
 2 A. I think for me as the principal, as much
 3 as I have to delegate and rely on others, to be much
 4 more diligent and follow up and follow through with my
 5 assistant principals with regard to any discipline
 6 issues, particularly resulting in suspension and/or
 7 mental health concerns, kids that are suicidal, kids
 8 that have made threats, kids that are bullied or being
 9 bullied, continuing the conversation, continuing to
 10 ask them what have you done, when have you last met
 11 with them. That has definitely been a change. And
 12 holding them accountable as well for having those
 13 conversations with counselors or teachers as
 14 appropriate, communicating more with parents. I think
 15 overall communication across the board at our school,
 16 you know, from teachers to teachers, from teachers to
 17 counselors, teachers to administrators, and every
 18 direction in between as well as -- and, I mean, you've
 19 given me some good ideas, I think, around, you know,
 20 student communication. I think advisement is going to
 21 help with that. But students communicating with
 22 adults, feeling safe in doing so.
 23 **Q. And that goes to a core cultural issue**
 24 **that I want to explore. And what have you found --**
 25 **because it's clear to me that you have actually**

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1 **learned a lot of the lessons that there are to be**
 2 **learned from what happened at Arapahoe, and I want**
 3 **to -- and you've made significant changes as a result**
 4 **of that. I mean, that's clear; okay?**
 5 A. Thanks.
 6 **Q. My question is, when it comes to the**
 7 **culture, what has been effective in your experience in**
 8 **getting those open lines of communication to actually**
 9 **flow?**
 10 A. Showing the staff I mean it, being real
 11 with them. We've also started this thing -- we call
 12 it warrior talk -- where any staff can come in and
 13 visit with us in the form -- "us" being the entire
 14 administrative team -- once a month, talk about
 15 whatever they want, any ideas they have, any questions
 16 they have, any concerns they have. Anything they want
 17 they can bring to our attention.
 18 And that came out of messages I was
 19 getting that, well, there's just been a culture for so
 20 long that we don't talk to the administration. There
 21 was this wall. And I didn't -- I thought that wall
 22 just automatically came down when I became the
 23 principal, and it didn't. And I know I still have
 24 work to do.
 25 And so one of the things we did this

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1 year was this warrior talk. I think it's making a
 2 difference. I think we're starting to build some
 3 trust amongst the staff in that we are here to help
 4 and support them and listen and, you know, be there,
 5 which, in turn, then -- it helps the kids. When the
 6 staff are in a better place and more trustworthy, then
 7 the kids are as well. So I think continuing to open
 8 those avenues of communication and showing the staff
 9 that we really are there for them. And I hope to keep
 10 doing that and keeping that culture alive, alive and
 11 moving in that direction.
 12 **Q. And, obviously, you along with, frankly,**
 13 **a lot of people, principally the two people to my**
 14 **left, paid a really high price to learn those lessons.**
 15 A. Mine can't even compare.
 16 **Q. I understand. But it's important to**
 17 **everybody in this room, I think, to make sure that**
 18 **those lessons aren't forgotten.**
 19 A. Absolutely.
 20 **Q. So what are your thoughts and ideas on**
 21 **how to make sure that folks at Arapahoe and LPS and**
 22 **around the state not only learn but sustain those**
 23 **lessons?**
 24 A. You know, I think there are a couple of
 25 ways that just immediately come to mind for me at

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1 Arapahoe. I don't know bigger picture than that, and
 2 you can take it from there and make it bigger. I
 3 don't know. But for us at Arapahoe, I think, you
 4 know, the gift of Clarity Commons and the opportunity
 5 to talk with kids about that at the beginning of the
 6 year gives me an opportunity every year to talk to
 7 every kid about what that means. And, to me, it means
 8 putting others above yourself. It means being kind.
 9 It means loving. It means taking care of one another,
 10 and that means sometimes telling somebody something
 11 that might be hard about a friend or about yourself
 12 or, you know, that kind of thing. So I was able to do
 13 that at the start of the school year this year and
 14 talk about Clarity Commons, about how -- what a
 15 beautiful space it is, and it was so incredible. I
 16 even had to reach out and send you an e-mail. To see
 17 the kids out there every day. I mean, you need to
 18 come by at lunchtime. It's truly what you imagined.
 19 They sit all over. It's amazing. And I go out there
 20 every day and I visit with those kids. And I talked
 21 to two seniors just this week who said, you know,
 22 Ms. P., I've never been out to Clarity Commons. It's
 23 pretty cool out here. And so there's one way. And I
 24 will always talk about it as long as I'm the principal
 25 because that's what it is for us.

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1 And I think, too, as we approach the
 2 anniversary every year to remind people. We can't
 3 forget what happened. It was awful. And we need to
 4 work together. I wish I could say I have the perfect
 5 answer to say it will never happen again. I think
 6 about it every day. Every day my heart breaks for you
 7 two, every day. And I hope that our lines of
 8 communication open up. I've felt very isolated from
 9 you guys. But I do think good has to come from this.
 10 Claire was too good of a girl not to let it. So
 11 whatever I can do in my tiny role at Arapahoe
 12 High School, I will do and help kids to learn from
 13 this.

14 **Q. Let me ask this. Take a minute.**
 15 **Because I do think you have something to offer in that**
 16 **space. I really do. And one question I have is, have**
 17 **you gone to other schools, whether it's inside LPS or**
 18 **outside, to talk to the teachers and the**
 19 **administrators at those other schools about the**
 20 **lessons that you have learned from this tragedy, to**
 21 **talk to those other schools about the mistakes that**
 22 **happened at Arapahoe and how to avoid them in the**
 23 **future?**

24 A. I haven't had that -- to be really
 25 honest, I probably haven't had the strength to do that

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1 yet.

2 **Q. All right.**

3 A. This has been the first year I feel like
 4 I've had the strength to kind of be a principal from
 5 an instructional standpoint and kind of get back on
 6 the track of helping -- helping us be an educational
 7 institution and all that. I think I see that in my
 8 future. I've certainly talked about it, our district,
 9 within our district; and I talked, I know, with my
 10 daughter's principal a little bit about how to build
 11 some of those bridges with -- a lot of our kids come
 12 from Powell, what we can do at a younger age and sort
 13 of -- I don't know. I see that in my future. I think
 14 it's something I'd like to get involved in and, you
 15 know, help make it better. I also know I have a
 16 school of 2100 kids to run.

17 **Q. Understood.**

18 A. So, you know, I don't know where it's
 19 going to fit in.

20 **Q. Well, and the reason I ask that is,**
 21 **candidly, one of the reasons that the Davises agreed**
 22 **to this arbitration and agreed to not pursue any**
 23 **claims for damages or liability for the school or the**
 24 **district or any of the people at the school or the**
 25 **district was so that the lessons that could be learned**

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1 **from this tragedy could be exported to other schools,**
 2 **so that no other family has to go through what they go**
 3 **through every day of their lives. And that's a**
 4 **message that it would be an absolute travesty to**
 5 **waste, which is why I'm asking.**

6 A. Certainly.

7 **Q. Is that something that you think you**
 8 **could do and that you think would help?**

9 A. I hope it would help, you know. I do
 10 hope it would help. I worry about the mental health
 11 aspect of all of it. I don't know how we fix that
 12 problem. I don't know what the answer is to that. I
 13 hope that within at least our community we can help,
 14 our state. I don't think I can do it by myself.

15 **Q. No, no one person is going to fix this.**

16 A. I'll do what I can to help prevent this
 17 from ever happening.

18 MR. ROCHE: Let's take just a couple of
 19 minutes, if we could. I'm going to throw you guys out
 20 for a minute.

21 (Recess taken, 3:47 p.m. to 3:56 p.m.)

22 **Q. (BY MR. ROCHE) Just a few more**
 23 **questions.**

24 A. Okay.

25 **Q. Has Arapahoe done a climate survey since**

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1 **you've been principal?**

2 A. Not what in my definition would be a
 3 full climate survey. I think it would be -- how would
 4 you define that when you say a "climate survey"?

5 **Q. Well, we've talked a lot about the**
 6 **culture of openness and the efforts you've undertaken**
 7 **to change and improve that culture of openness; right?**

8 A. Um-hum.

9 **Q. What I'm trying to talk about is**
 10 **measuring the results of that effort through a climate**
 11 **survey.**

12 A. No, we haven't; and I think that would
 13 be fabulous, staff, students, parents, everyone.

14 **Q. Exactly. That's what I'm asking about.**
 15 **Are there plans to do anything like that?**

16 A. It's definitely been on my radar, and
 17 I've talked about it a little bit with a few of my
 18 administrators, something I would like to do. I know
 19 we do the TELL survey, but that's really a teacher
 20 only kind of survey.

21 **Q. Right.**

22 A. And I have never done one as a principal
 23 anyway, so I think it would be a good thing for me to
 24 do.

25 **Q. All right. Obviously, you talked about**

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1 **trying to take down the wall between teachers and**
 2 **administrations to open the lines of communication and**
 3 **same with teachers and students or, to just call it**
 4 **more broadly, students and adults; right?**
 5 A. Yes.
 6 **Q. Looking back, can you think what warning**
 7 **signs there might be that that wall is in place?**
 8 A. I don't think it's -- I don't think we
 9 have an adversarial relationship like
 10 administrative-faculty. I've been in schools where
 11 that's been present. So I don't know that there's
 12 really a wall. I think it was a fear of sharing
 13 things maybe with administration.
 14 **Q. And what I'm trying to get at is: What**
 15 **would you as a principal tell other teachers and**
 16 **administrators to look out for to recognize that there**
 17 **is that fear of open communication or that there is a**
 18 **sort of culture of silence when it comes to talking**
 19 **about these difficult issues like mental health and**
 20 **kids in crisis?**
 21 A. So there's two pieces to that for me.
 22 One is just discipline in general, that teachers need
 23 to feel safe and confident in referring a student. I
 24 think sometimes teachers feel that they're going to be
 25 looked down on, they can't control their classroom.

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1 They shouldn't be writing that many referrals. It's
 2 not -- they should be able to handle it. But just
 3 assuring them to continue to refer and to continue to
 4 get us involved and make sure that we're helping
 5 support them with the difficult kids as far as
 6 discipline goes.
 7 The mental health piece has become a
 8 huge challenge for all of us, teachers included. They
 9 are having to become more of a counselor than they've
 10 ever been, so we're all looking for help and support
 11 on that side of things. So I guess, again,
 12 encouraging them. And when they do come forward and
 13 bring things to us to be supportive and not judge them
 14 in a negative way in any way, shape, or form, expect
 15 them to share things about kids.
 16 **Q. And is there a -- looking back, are**
 17 **there things that you recognize as being signs that**
 18 **teachers or students were reluctant to come forward**
 19 **with difficult information?**
 20 A. Not really other than hearsay. You
 21 know, teachers may be saying, Well, I've always been
 22 afraid to tell administration. It makes us look bad.
 23 You know, hearsay, nothing concrete, nothing that I
 24 could say was in place, so to speak.
 25 **Q. Okay. As I've told you, these**

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1 **depositions are going to be part of a report that goes**
 2 **to the legislature; and I want to give you the**
 3 **opportunity as well to ask. Is there anything else**
 4 **you want to say or to share as part of this process**
 5 **because it is going to go to the legislature with**
 6 **ideas and recommendations?**
 7 A. I think it was way too easy for Karl
 8 Pierson to buy a gun. I'm not an advocate for no
 9 guns, no -- you know, that kind of thing. But I don't
 10 know where that lands in the legislative lap, but it
 11 was pretty easy for that kid to go out and buy a gun.
 12 I think, though, probably my biggest message would be,
 13 my biggest hope would be that they would properly fund
 14 public education in Colorado. It affects everything
 15 we do. We can't hire enough teachers in the classroom
 16 to bring class size down. We can't hire enough -- we
 17 are very fortunate that we have been given some
 18 staffing by our district to fund mental health, I
 19 think, pretty appropriately right now with six
 20 counselors. We used to have four. Two psychologists,
 21 we used to have one. But administrators, deans, you
 22 know, just help. We need help to take care of these
 23 kids at school because everyone, even district
 24 administration, we're stretched to the limit on what
 25 we can handle; and I don't think they care. All they

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1 care about is assessment and data and scores; and I'm
 2 telling you, if they would fund education properly and
 3 let us run our schools and let us have our teachers
 4 teach the kids in a reasonable environment, the data
 5 will take care of itself. It really will. And they
 6 don't seem to be listening to that piece in every
 7 session. We need to fund public education.
 8 **Q. Okay.**
 9 A. And that affects all of this, so
 10 funding, staffing. We need help. We need resources.
 11 I think that we really need to have resources at the
 12 very, very beginning of school-age children in mental
 13 health. They need to be learning lessons about how to
 14 play nicely in the sandbox, literally, and carrying
 15 that all the way through even into college, if they
 16 can continue programs at the college level. And I
 17 don't care if the kids don't like advisement. We're
 18 going to tell them stuff that's good for them and
 19 we're going to help them be better people. And
 20 education for parents somehow somehow, helping them
 21 parent. They're afraid to do that sometimes. And
 22 then we, as the school, become the parents. I mean,
 23 it's all on us. I went to school to be a science
 24 teacher. It's really different now. And I love what
 25 I do. Don't get me wrong. I love it. I love what I

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1 do. I want it to be better and I want to make a
2 difference, but we need help.

3 **Q. Okay. Well, again, thank you for coming**
4 **in. I know that this isn't easy and that some of the**
5 **topics are difficult and uncomfortable; but this is an**
6 **important process and you're an important part of it.**
7 **And I can tell you, I speak for the Davises, we really**
8 **do appreciate your coming in and answering these**
9 **questions.**

10 A. Of course.

11 MR. ROCHE: So that's all I've got. I
12 don't think Mr. Everall has any questions for you, but
13 I could be wrong.

14 MR. EVERALL: I don't.

15 MR. ROCHE: All right. We are off the
16 record.

17 WHEREUPON, the within proceedings were
18 concluded at the approximate hour of 4:04 p.m. on the
19 6th day of November, 2015.

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REPORTER'S CERTIFICATE
STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, ELLIE K. LIEBENOW, Registered
Professional Reporter and Notary Public ID
20034039357, State of Colorado, do hereby certify that
previous to the commencement of the examination, the
said NATALIE PRAMENKO 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 of 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 19th day of November, 2015.

My commission expires November 18, 2019.

Reading and Signing was requested.

Reading and Signing was waived.

Reading and Signing is not required.

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I, NATALIE PRAMENKO, 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

NATALIE PRAMENKO

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

Notary Public
My Commission expires:

REPORTER'S CERTIFICATE

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

I, ELLIE K. LIEBENOW, Registered Professional Reporter and Notary Public ID 20034039357, State of Colorado, do hereby certify that previous to the commencement of the examination, the said NATALIE PRAMENKO 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 of 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 19th day of November, 2015.

My commission expires November 18, 2019.

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- Reading and Signing was waived.
- Reading and Signing is not required.



 Ellie K. Liebenow
 Registered Professional Reporter

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