

1 JAG NO: 2015-0665A

2 DEPOSITION OF: ESTHER SONG - October 9, 2015

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

10

11

12 PURSUANT TO NOTICE, the deposition of
13 ESTHER SONG was taken on behalf of the Claimants at
14 950 17th Street, Suite 2400, Denver, Colorado 80202,
15 on October 9, 2015, at 9:01 a.m., before
16 Ashley D. Mahe, Registered Professional Reporter and
17 Notary Public within Colorado.

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<p>JAG NO: 2015-0665A</p> <hr/> <p>DEPOSITION OF: ESTHER SONG - October 9, 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 ESTHER SONG was taken on behalf of the Claimants at 950 17th Street, Suite 2400, Denver, Colorado 80202, on October 9, 2015, at 9:01 a.m., before Ashley D. Mahe, Registered Professional Reporter and Notary Public within Colorado.</p>	<p style="text-align: center;">I N D E X</p> <p>EXAMINATION OF ESTHER SONG: PAGE October 9, 2015</p> <p>By Mr. Roche 5</p> <p>DEPOSITION EXHIBITS: INITIAL REFERENCE</p> <p>Exhibit 36 The School Shooter: A Threat Assessment Perspective 30</p> <p>Exhibit 37 The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States 30</p> <p>Exhibit 38 Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates 39</p> <p>Exhibit 39 Threat Assessment & Action Plan 72</p> <p>Exhibit 40 Progress Report 200</p> <p>Exhibit 41 Arapahoe High School, Faculty Meeting, Wednesday, February 12, 2014, 2:30 p.m. - 3:15 p.m. 209</p> <p>Exhibit 42 E-mail to B. Pierson from Song, 9/10/13, Subject: Re: Karl Pierson, with e-mail attached 223</p> <p>DEPOSITION EXHIBITS: (Previously marked)</p> <p>Exhibit 3 Arapahoe High School Staff Handbook 2013-2014 35</p> <p>Exhibit 4 Threat Assessment Best Practices and Procedures, Littleton Public Schools, Spring, 2011 52</p> <p>Exhibit 5 Essentials of School Threat Assessment: Preventing Targeted School Violence 92</p>
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<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>For Esther Song: J. ANDREW NATHAN, ESQ. Nathan Dumm & Mayer P.C. 7900 East Union Avenue Suite 600 Denver, Colorado 80237</p> <p>Also Present:</p> <p>Michael Davis Desiree Davis Carol Lembke Lois McClure William Woodward Michael Jones Linda Kanan (Appearing Telephonically)</p>	<p>Exhibit 9 LPS Threat Assessment/Danger Assessment Training Overview 93</p> <p>Exhibit 10 Surveys, Culture/Climate Surveys, PBIS Surveys, Youth Risk Behavior Survey 37</p> <p>Exhibit 11 Littleton Public School District's Answers and Responses to Claimants' First Set of Interrogatories and Requests for Production of Documents 101</p> <p>Exhibit 14 Letter to our Arapahoe County Citizens from Walcher, with attachment 204</p> <p>Exhibit 17 Littleton Public Schools, Administrative Review of LPS Threat Assessment Protocols, June 24, 2014 215</p> <p>Exhibit 19 Contact Log 115</p> <p>Exhibit 24 Behavior Detail Report, Name: Karl Halverson Pierson Grade: 12 113</p> <p>Exhibit 33 Progress Report 143</p> <p>Exhibit 35 Threat Assessment & Action Plan 97</p>

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1 WHEREUPON, the following proceedings were
 2 taken pursuant to the Colorado Rules of Civil
 3 Procedure.
 4 * * * * *
 5 ESTHER SONG,
 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, Dr. Song.**
 11 A. Good morning.
 12 **Q. I don't think that you and I have met**
 13 **before.**
 14 A. I don't think so.
 15 **Q. But I am Mike Roche, and, as you know,**
 16 **I'm representing the Davis family in connection with**
 17 **the arbitration that we are conducting in conjunction**
 18 **with the Littleton Public School District. First,**
 19 **thank you for coming in. I appreciate it. I know**
 20 **you've got a lot going on.**
 21 A. I know, and I appreciate you working with
 22 my schedule also.
 23 **Q. Absolutely. I'm going to guess, and I**
 24 **may be wrong, but I'm going to guess that you have not**
 25 **been through a deposition previously?**

6

1 A. Right.
 2 **Q. So I know you've met with Mr. Nathan**
 3 **about how the process works, and I certainly don't**
 4 **want to intrude into what the two of you have**
 5 **discussed, but there are some rules of the road that I**
 6 **go over with every witness. First, this is not a**
 7 **marathon. So we're going to try to take a break every**
 8 **hour or so anyway, but if there comes a time during**
 9 **the deposition that you want to take a break for any**
 10 **reason, just tell me, and we'll take a break.**
 11 A. Okay.
 12 **Q. Even if it's ten minutes after our last**
 13 **one, that's okay.**
 14 A. Okay.
 15 **Q. The second rule of the road is Ashley is**
 16 **really good at her job, but she's only got one**
 17 **machine, so it makes it -- she can only take down one**
 18 **person talking at a time. So I'm going to do my best**
 19 **to not talk over you, and it would help if you do the**
 20 **same with me. Although it might seem conversational,**
 21 **it's very important to get a clear record on this.**
 22 **The third thing, and, again, I tell every**
 23 **witness this, there will come a time when I ask a bad**
 24 **question that doesn't make any sense. When that**
 25 **happens, it's not an if, but a when, when that**

7

1 **happens, I ask a question that doesn't make sense that**
 2 **you don't understand, will you tell me so I can try to**
 3 **fix it?**
 4 A. Yes. I'll do my best.
 5 **Q. Perfect. The other thing that I think**
 6 **it's important to know as part of this process is this**
 7 **arbitration is not about recovering any money, the**
 8 **Davises aren't seeking any damages in this case. This**
 9 **is not about trying to prove whether somebody or some**
 10 **institution was negligent. Do you understand that?**
 11 A. Yes.
 12 **Q. It is important, though, because there**
 13 **are -- what this arbitration is about is looking back**
 14 **and looking forward. The backward looking component**
 15 **is trying to figure out how the tragedy on December 13**
 16 **happened, and the forward looking part is trying to**
 17 **figure out how do we stop it from happening again.**
 18 **Okay. So all of my questions, and I know**
 19 **some of them are going to be difficult, are done with**
 20 **that in mind. It's not about casting blame. It's**
 21 **about stopping this from happening down the road.**
 22 **Okay?**
 23 A. Yep.
 24 **Q. Do you want to take a minute now?**
 25 A. No, I'm fine. I'm sorry for being

8

1 emotional already.
 2 **Q. Look, this is an emotional topic, I**
 3 **understand that. It's emotional, frankly, for all of**
 4 **us. But I meant it when I said, if you need a break,**
 5 **just tell me.**
 6 A. Yes, I will. Thanks.
 7 **Q. Okay. Well, let's start with some of the**
 8 **simple stuff.**
 9 A. Okay.
 10 **Q. Tell me about your education and your**
 11 **background.**
 12 A. So I had my -- I got my clinical psych
 13 degree from Tufts and went to DU for grad school and
 14 got my PsyD in clinical psych in '99. And then -- so
 15 my specialty was in forensic at that point, and I
 16 worked for Dr. Wilson with Colorado Assessment and
 17 Treatment Center and with John Nicoletti. And then
 18 left the country, went to Antarctica and worked for
 19 Nicoletti as a subcontractor, and then came back and
 20 started working in the Cherry Creek School District in
 21 2001.
 22 And first did a -- sorry, I'm trying to
 23 think. I might have worked in the school district in
 24 2000 for covering for somebody who went on maternity
 25 leave. And then when I returned from Antarctica in

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1 2001, went to Overland High School and worked at
 2 Overland High School for four years, full time. Then
 3 halftime at Overland High School and the Manor, their
 4 alternative high school. And then left in 2008, went
 5 to Arapahoe, from 2008 to 2014 -- '13, sorry, 2013.
 6 And then left and went to Prairie Middle School in
 7 2000 -- sorry, 2013. Is that right? Sorry, 2014.
 8 I'm sorry.
 9 **Q. Let's do this. Let's get a list of the**
 10 **schools, and then we'll work back into the dates.**
 11 A. Okay. So right now, I'm at Grandview
 12 High School.
 13 **Q. And it's out in Aurora?**
 14 A. Correct. And then last year I was at
 15 Prairie Middle School.
 16 **Q. Okay.**
 17 A. And before that, I was at Arapahoe from
 18 2008 until the time I went to Prairie Middle School.
 19 **Q. Okay. So let's start with your time with**
 20 **Nicoletti. You said you worked for Dr. Nicoletti in**
 21 **Antarctica as a subcontractor?**
 22 A. Correct.
 23 **Q. Was that the only work that you did with**
 24 **Dr. Nicoletti?**
 25 A. No. Prior to leaving for Antarctica, I

10

1 would do stress management workshops and communication
 2 -- verbal communication workshops for some of the
 3 sheriff's departments and fire departments in the area
 4 and did some therapy with some of the children of fire
 5 and sheriff's departments, officers.
 6 **Q. Okay. And during what time period you**
 7 **were doing that work for Dr. Nicoletti?**
 8 A. Probably '99 to 2001. I think I may have
 9 started in '98 with him, during my last year of grad
 10 school.
 11 **Q. Okay. And when did you graduate from DU**
 12 **with your PsyD?**
 13 A. '99.
 14 **Q. Oh, that was in '99?**
 15 A. Correct.
 16 **Q. Okay. And then from '99 to '01, you**
 17 **worked for Dr. Nicoletti, or maybe '98 to '01?**
 18 A. Right. '99 to -- October 2000, I left
 19 for Antarctica, so I was still working for him, and
 20 when I came back to the States in June of 2001, is
 21 when I stopped working for him.
 22 **Q. All right. And during your time with**
 23 **Dr. Nicoletti, it sounds like you were working most --**
 24 **setting aside your Antarctica piece, which we'll get**
 25 **to, you were working mostly with firefighters and**

11

1 **police officers on stress management --**
 2 A. Correct.
 3 **Q. -- concerns?**
 4 A. Well, I was doing workshops for them
 5 primarily and then -- so it would be an eight-hour
 6 workshop during the day. It was just part of their
 7 training. And the therapy that I would do would be
 8 with -- it was usually with their children. I
 9 specialized in young adults, teenagers and young
 10 adults. So it was usually with their kids.
 11 **Q. All right. But, again, on stress**
 12 **management?**
 13 A. Just, I think, everyday issues that they
 14 were -- that they had going on in their lives. Not
 15 necessarily stress management, but it could have been
 16 stress, it could have been school-related or related
 17 to family issues.
 18 **Q. All right. And was your work with**
 19 **Dr. Nicoletti full-time work?**
 20 A. No, it was part time. That's when I was
 21 also working for Dr. Wolfsohn.
 22 **Q. And who is Dr. Wolfsohn?**
 23 A. He is -- well, I don't know if he has
 24 since retired, but he was a psychologist in the
 25 district who did work with Department of Youth

12

1 Corrections. And so I would do groups and individual
 2 counseling with kids that were in the youth
 3 correctional system, and I would go to halfway houses
 4 and run group there or do individual at the office.
 5 **Q. Okay.**
 6 A. So I was subcontracting for both of them.
 7 **Q. Got it. And what were you doing in**
 8 **Antarctica?**
 9 A. I was trying to set up an employee
 10 assistance program essentially for the staff and
 11 employees of the United States Antarctica program.
 12 **Q. Okay.**
 13 A. So at that time, Raytheon had taken over
 14 that year for Antarctica Support Associates. So they
 15 had contracted with Nicoletti that -- they had been
 16 contracting with Nicoletti prior to that point to do
 17 assessments to see if people would be fit to winter
 18 over or if they were -- if they were appropriate
 19 candidates to, you know, extend their stays down
 20 there. And the year that Raytheon took over, they
 21 decided that they wanted to try to actually set up a
 22 program down there. So I had volunteered to go. I
 23 wanted to go.
 24 **Q. Got it.**
 25 A. I went down there for him.

13

1 **Q. How long were you there?**
 2 A. From October through February of 2001.
 3 **Q. So you didn't have to winter over?**
 4 A. I did not have to winter over. I would
 5 have liked to though.
 6 **Q. I actually have a friend who did.**
 7 A. Yeah, it's quite an amazing experience.
 8 **Q. That's what I hear. After your time with**
 9 **Nicoletti and Wolfsohn, you said you switched to**
 10 **working for Cherry Creek School District sometime**
 11 **around '01?**
 12 A. Uh-huh.
 13 **Q. And what caused that shift on your career**
 14 **path?**
 15 MR. EVERALL: Just one second. Just
 16 remember to answer out loud, because the court
 17 reporter has trouble with uh-huhs and nods.
 18 **Q. (BY MR. ROCHE) Oh, sorry. I meant to do**
 19 **that.**
 20 A. Okay. I'm sorry. Can you repeat the
 21 question?
 22 **Q. Sure. After your time working for**
 23 **Dr. Nicoletti and Dr. Wolfsohn, you moved into the**
 24 **Cherry Creek School District sometime around 2001,**
 25 **correct?**

14

1 A. Correct.
 2 **Q. And what prompted that change?**
 3 A. Prior to leaving for Antarctica, I had
 4 worked covering someone on maternity leave in Cherry
 5 Creek Schools and had enjoyed that environment, I
 6 guess. I was working in an alternative middle school
 7 program for grades 6 through 9, and it was only about
 8 two months, two-and-a-half months. But when I came
 9 back from Antarctica, to be quite honest, I was trying
 10 to figure out which direction I wanted my career to go
 11 in and really wanted to be able to blend -- be able to
 12 blend traveling and continuing to work. So when I had
 13 gone to Antarctica, we had an around-the-world ticket,
 14 so I was able to travel on the way home. So that was
 15 an important piece to me. So I came back and
 16 contacted Cathy Lines, who was the director of mental
 17 health, I think that was her role at the time, to see
 18 if there were any openings in the school district.
 19 **Q. Got it. And when you started with the**
 20 **Cherry Creek School District, your first assignment**
 21 **was at Overland High School?**
 22 A. Correct.
 23 **Q. And how long were you at Overland High**
 24 **School?**
 25 A. Full time from 2001 to 2005, and then

15

1 halftime 2005 to 2008 at Overland High School. And
 2 then halftime at the Manor, their alternative program.
 3 **Q. And you were halftime at Manor from '05**
 4 **to '08?**
 5 A. Correct.
 6 **Q. And what prompted the move to Arapahoe**
 7 **High School in 2008?**
 8 A. I really -- I was looking for a full-time
 9 position. A couple of years after I decided to do the
 10 halftime/half-time split, I decided that I really
 11 wanted to be one place full time. There weren't any
 12 openings in the district, there wasn't any movement at
 13 that time. And also Ron Lee, who was my mentor when I
 14 first came in the district, he actually went to
 15 Littleton Public Schools earlier that year. So I just
 16 -- the position came up, and it ended up being --
 17 seeming like a good fit.
 18 **Q. Okay. And you were at Arapahoe from '08**
 19 **until when?**
 20 A. 2014.
 21 **Q. And, I guess, I don't know, did you**
 22 **finish out the '13-'14 year at Arapahoe High School?**
 23 A. I did.
 24 **Q. And then left --**
 25 A. I left the following school year.

16

1 **Q. So when did you start at --**
 2 A. So August 2014 was when I started at
 3 Prairie Middle School.
 4 **Q. Were you still employed by Littleton**
 5 **Public Schools through the summer of 2014 up until you**
 6 **started at Prairie Middle School?**
 7 A. I think -- yeah, I think our contract was
 8 through the end of July.
 9 **Q. Okay.**
 10 A. I'm not quite certain what the contract
 11 dates were, but I had accepted the position in Cherry
 12 Creek Schools at the end of May.
 13 **Q. Okay. And you were at Prairie Middle**
 14 **School for one school year?**
 15 A. Correct.
 16 **Q. And then you started at Grandview at the**
 17 **beginning of the current school year; is that right?**
 18 A. Correct.
 19 **Q. And were you the -- either the school**
 20 **psychologist at those different schools or one of the**
 21 **school psychologists at those schools throughout that**
 22 **15-year history that we're talking about?**
 23 A. At Overland, I was the only school
 24 psychologist, but we also had a social worker. At the
 25 Manor, I was the only school psychologist, but it was

17

1 also a school of 30. At Arapahoe, I was the only
 2 school psychologist. And Prairie Middle School, there
 3 was myself, and then one-and-a-half social workers.
 4 And then I'm one of two school psychologists at
 5 Grandview.
 6 **Q. Okay. And tell me, if you would, what is**
 7 **-- what are your job responsibilities as a high school**
 8 **psychologist?**
 9 A. Meeting with students, when they're
 10 having difficulties, going into the classroom, and
 11 observing kids doing testing for special education
 12 evaluations, consulting with special education
 13 teachers, consulting with gen ed teachers as well if
 14 there's concerns, working closely with counselors,
 15 suicide assessments, threat assessments. We do
 16 presentations in health classrooms or in student
 17 seminars based on needs, groups at times.
 18 **Q. Okay.**
 19 A. Working with parents and families,
 20 consulting with outside agencies.
 21 **Q. Now, was it a part of your job at**
 22 **Arapahoe to make outside referrals? You mentioned**
 23 **consulting with outside agencies. Was that a regular**
 24 **part of your job to refer students who needed mental**
 25 **health care to outside agencies?**

18

1 A. We would talk with parents about if we
 2 felt like they might -- if students might benefit from
 3 more mental health services. So we would make
 4 recommendations to parents if we felt like that would
 5 be helpful. But, you know, if we had a suicide
 6 assessment and we felt the student needed to go to the
 7 emergency room or get further evaluated, we would make
 8 those recommendations to parents. But I would -- you
 9 know, we would make recommendations to Second Wind
 10 Foundation if there were students who needed
 11 counseling and they couldn't afford it. So, yes, you
 12 know, we would make -- we would have contact with
 13 outside agencies quite a bit.
 14 **Q. Okay. And how often in a typical school**
 15 **year when you were at Arapahoe would you make**
 16 **recommendations or referrals to a parent that their**
 17 **student should maybe consider going and getting**
 18 **professional mental health treatment?**
 19 A. I really can't say with certainty, but I
 20 would -- I would -- I mean, it really was as-needed.
 21 I don't know if I could give a number, because I feel
 22 like on any given week, it could have been one child,
 23 or it could have been the next month I could have had
 24 a student that I would have a conversation with the
 25 parent. But, again, I mean, it was kids who were

19

1 coming to our attention because either parents were
 2 calling and asking for help or they were coming up --
 3 there was maybe continued issues that might be coming
 4 up, so . . .
 5 **Q. Okay. Let me try to get at it this way.**
 6 **It wasn't an uncommon occurrence for you to recommend**
 7 **to parents that they get some form of mental health**
 8 **treatment for a student in your charge, was it?**
 9 A. It wasn't uncommon, no.
 10 **Q. Okay. As I'm sure you've heard, we've**
 11 **had a number of these depositions, and we've looked at**
 12 **a lot of documents already. I promise we're not going**
 13 **to go through everything you see in front of you, but**
 14 **there are a few things I wanted to ask you about. So**
 15 **I'm going to ask you to take a look at this. And if**
 16 **you want to turn your attention to tab 3. As you can**
 17 **see, tab 3 is the Arapahoe High School Staff Handbook**
 18 **for the 2013-2014 year. Is that a document you're**
 19 **familiar with?**
 20 A. Yes.
 21 **Q. And if you jump ahead to -- you'll see in**
 22 **the lower right-hand corner there are page numbers,**
 23 **LPS 013 something, something. If you'll jump ahead to**
 24 **LPS 01397, and you can look at the previous page as**
 25 **well, which talks about the counselor assignments.**

20

1 **You see you're listed there as the school**
 2 **psychologist --**
 3 A. Yes.
 4 **Q. -- in the counselor assignment section?**
 5 A. Yes.
 6 **Q. And then on the next page, that 1397**
 7 **page, it talks about the counseling responsibilities.**
 8 **Do you see that?**
 9 A. Yes.
 10 **Q. And does that outline the**
 11 **responsibilities that you as the school psychologist**
 12 **and the other counselors listed were expected to**
 13 **perform at Arapahoe High School?**
 14 A. Not my responsibilities, no.
 15 **Q. Okay. Are your responsibilities listed**
 16 **somewhere in this document?**
 17 A. Not that I'm aware of, no.
 18 **Q. Okay. And that was one of the questions**
 19 **that I had, because this list of counseling**
 20 **responsibilities doesn't really even remotely match up**
 21 **with what I envisioned your job would be. So, for**
 22 **instance, on this page there's no mention of any**
 23 **safety issues or suicide assessments or threat**
 24 **assessments, but those were clearly part of your job,**
 25 **right?**

21

1 A. Correct.

2 **Q. Okay. During your time as a school**

3 **psychologist prior to December 13, 2013, do you know**

4 **how many threat assessments you had performed?**

5 A. No, not off the top of my head, but I

6 would guess anywhere from five to ten.

7 **Q. Okay. And I can tell you, because I've**

8 **got the documents, that you're probably pretty close**

9 **to right because I know you performed two at Arapahoe**

10 **between 2008 and the threat assessment that you did on**

11 **Karl Pierson. So you're thinking you did somewhere**

12 **between three and seven in the previous -- at your**

13 **previous positions?**

14 A. At Overland, right. I mean, I can

15 remember two off the top of my head, so I'm guessing

16 there might have been one or two -- I don't know.

17 There might have been one or two -- more. So that's why

18 I'm saying maybe five to ten total, but I don't know

19 with certainty.

20 **Q. But less than one a year?**

21 A. Correct.

22 **Q. Were the two you remember off the top of**

23 **your head at Arapahoe, or were they at other schools?**

24 A. At other schools, at my other school.

25 **Q. Okay. And can you tell me what reading**

22

1 **or training you had received on how to do a threat**

2 **assessment as a school psychologist?**

3 A. In either district?

4 **Q. Yes.**

5 A. We had trainings through the mental

6 health team in Cherry Creek about how to implement or

7 how to do a threat assessment and how they would do

8 it. And then you were expected to do a refresher

9 every year, but every three years to do, you know,

10 another training. And at Littleton we also had -- I

11 remember going to at least one training on threat

12 assessment, but I don't recall.

13 **Q. Was the training at the Cherry Creek**

14 **School District mandatory?**

15 A. For mental health?

16 **Q. For the mental health professionals.**

17 A. Correct.

18 **Q. What about for the other people who would**

19 **be involved in the threat assessment process?**

20 A. I'm not sure if it was mandatory. It was

21 always best practices that administration and

22 counselors had the training, but I don't know if it

23 was -- I don't even know now if it is actually

24 mandatory. I think that it's expected for people or

25 at least for people who are on the safety team, but I

23

1 don't know --

2 **Q. Okay.**

3 A. -- if it's mandatory. It wasn't

4 mandatory in Littleton. It was for mental health.

5 **Q. Okay. But not for administration?**

6 A. Not that I'm aware of. I think it was

7 best practices.

8 **Q. Okay. And who performed the training at**

9 **the Cherry Creek School District on how to perform a**

10 **threat assessment, whether it's the full training or**

11 **the annual refresher?**

12 A. I mean, there's been various people, but

13 it was Dr. Ron Lee, Dr. Linda Kanan, Marla Bonds,

14 Dr. Bonds' husband was involved.

15 **Q. Was it always taught by somebody with a**

16 **doctorate?**

17 A. I think so.

18 **Q. And how long would the training at Cherry**

19 **Creek last? Was it a full-day thing or a couple of**

20 **hours or do you remember?**

21 A. I can't recall. I feel like the main --

22 the big training is maybe a full day, and then the

23 refresher is a half day, but I don't know off the top

24 of my head.

25 **Q. All right.**

24

1 A. And I'm not -- sorry.

2 **Q. That's okay. Go ahead.**

3 A. I'm not sure if that also includes the

4 suicide assessment training piece.

5 **Q. Okay. And my understanding is that the**

6 **threat assessment training that was done at Littleton**

7 **Public Schools was a two-hour program?**

8 A. I don't remember.

9 **Q. And it was taught by Nate Thompson?**

10 A. Most likely.

11 **Q. Do you remember --**

12 A. I mean, I'm guessing that it was because

13 he was the head of the mental health team.

14 **Q. Do you know, does Nate have a**

15 **professional degree?**

16 A. He has an LCSW.

17 **Q. He does not have a doctorate, though,**

18 **correct?**

19 A. Correct.

20 **Q. Correct. Do you recall during the**

21 **training that you received on threat assessments at**

22 **Cherry Creek School District, was there more than one**

23 **person who performed the training, or was it just one**

24 **person at a time?**

25 A. There's -- I feel like -- and I don't

25

1 know if I'm confusing times that I have been trained,
 2 but I feel like there's always been multiple people
 3 involved in the training. So kind of tag teaming, if
 4 you will --
 5 **Q. Sure.**
 6 A. -- on the subject. I feel like there's
 7 collaboration between several professionals that will
 8 present the information. So I don't think it's one
 9 person that's been there the whole day or for the
 10 three hours or four hours that you're there.
 11 **Q. Okay. And when you performed threat**
 12 **assessments in the Cherry Creek School District, who**
 13 **would typically attend those or who would participate**
 14 **in those?**
 15 A. The mental health team and the
 16 administrators and some counselors. And not all of
 17 the administrators, but there would often be one or
 18 two from the building and a counselor or counselors.
 19 All of the counselors actually in Cherry Creek are
 20 also trained on the process.
 21 **Q. And I guess one of the things I'm trying**
 22 **to get at is when you performed threat assessments at**
 23 **the Cherry Creek School District, how many people**
 24 **would be involved in a given threat assessment?**
 25 A. Usually -- usually at least three. So

26

1 typically in Cherry -- are we talking about Cherry
 2 Creek Schools before or now or --
 3 **Q. Before.**
 4 A. Before. What I recall, because that was
 5 still a while ago, was that we would have at least
 6 two. Usually we'd have the SRO or -- and I don't -- I
 7 say usually, but I don't think there was a usually
 8 because we didn't do them with regularity. But when I
 9 did do them, what I recall is that we would have a
 10 counselor, myself, and the administrator and sometimes
 11 an SRO.
 12 **Q. So three to four people would participate**
 13 **in the threat assessments at Cherry Creek?**
 14 A. Yes.
 15 **Q. During the training that you received at**
 16 **Cherry Creek School District on performing threat**
 17 **assessments, did that training include any**
 18 **role-playing as part of the process?**
 19 A. I don't remember exactly, but I feel like
 20 we would often do tabletop exercises and, you know,
 21 have exercises at -- within the group at the table.
 22 **Q. And did your training at Cherry Creek**
 23 **also include actually filling out the form threat**
 24 **assessment document that Cherry Creek used?**
 25 A. I don't remember. I know we've gone over

27

1 the form together, but I don't know if it actually
 2 entailed filling it out together.
 3 **Q. And when you actually performed a threat**
 4 **assessment at Cherry Creek, was it reviewed as a**
 5 **matter of course by some other professional?**
 6 A. Can you clarify?
 7 **Q. Sure.**
 8 A. I'm not sure what you're asking.
 9 **Q. No, that's totally okay. Was it a**
 10 **standard practice at Cherry Creek School District to**
 11 **get some kind of second opinion on the conclusions**
 12 **that the threat assessment team had reached in filling**
 13 **out a threat assessment at Cherry Creek?**
 14 A. I think if we felt like they were -- if
 15 they were on medium or high level concern, we would
 16 often consult with people at the district level, but
 17 not typically with a low-level threat.
 18 **Q. Okay. And did you do any continuing**
 19 **education or training on threat assessments as part of**
 20 **your professional development after you started**
 21 **working at school districts?**
 22 A. I've been to safety conferences that have
 23 been statewide, safety conferences I've been to. The
 24 Colorado Society of School Psychologists would have
 25 presentations on different safety concerns. I don't

28

1 know if it was necessarily on a threat assessment.
 2 I'm sure there were some that were. But, yes, I have
 3 and continued training on that.
 4 **Q. Okay. And do any of those programs or**
 5 **continuing education efforts that you took -- are they**
 6 **something that stand out in your mind as being**
 7 **particularly relevant to how to perform a threat**
 8 **assessment?**
 9 A. I think they were all relevant in helping
 10 us continue to look at what factors to be aware of and
 11 what things to look for in identifying potential
 12 threats.
 13 **Q. Okay. Did you -- when you performed the**
 14 **threat assessment on Karl Pierson, did you go back and**
 15 **review any of the training materials that you received**
 16 **from any of those continuing education programs?**
 17 A. I don't believe so.
 18 **Q. Okay. And you mentioned you attended**
 19 **some safe school programs. Were those put on by the**
 20 **Colorado School Safety Resource Center?**
 21 A. Yes.
 22 **Q. And is that something you attend**
 23 **annually?**
 24 A. No. I -- no, I didn't. Sorry. We
 25 didn't get to do -- I didn't have the opportunity to

29

1 do a lot of trainings outside of the building.
 2 **Q. Okay. Just a money issue?**
 3 A. That and time. I think the resources
 4 within the building, it was hard to have more than one
 5 person out at a time logistically.
 6 **Q. Okay. I'm happy to mark these or just**
 7 **show them to you. My question is going to be, have**
 8 **you seen this or read this as part of your continuing**
 9 **education? The first one is a department of justice**
 10 **FBI document titled, "The School Shooter: Threat**
 11 **Assessment Respective."**
 12 A. I've seen it.
 13 **Q. Is this something that you had read prior**
 14 **to December 13, 2013?**
 15 A. No.
 16 **Q. Okay. So you had seen this since that**
 17 **time, since the shooting at Arapahoe High School?**
 18 A. I don't know. I feel like I've seen it
 19 at a training or, you know, this may have been
 20 mentioned of, but I don't think I've had it in my
 21 possession --
 22 **Q. Okay.**
 23 A. -- to look at.
 24 **Q. Fair enough. I'll grab that back.**
 25 MR. EVERALL: Shouldn't we make that an

30

1 exhibit?
 2 MR. ROCHE: Yeah, I'm happy to make that
 3 an exhibit.
 4 (Deposition Exhibits 36 and 37 were
 5 marked.)
 6 **Q. (BY MR. ROCHE) And what's been marked as**
 7 **Exhibit 37 is a document titled "The Final report and**
 8 **Findings of the Safe School Initiative: Implications**
 9 **for the Prevention of School Attacks in the United**
 10 **States." And, again, this is a Secret Service FBI**
 11 **report dated July 2004. Is this a document that you**
 12 **would have read or studied prior to the shooting at**
 13 **Arapahoe High School in December of 2013?**
 14 A. I've seen it, and I know I've read it,
 15 but I don't know how far -- I mean, it wasn't anytime
 16 in close proximity to the shooting. It was at some
 17 point, I'm pretty sure, when I was in Cherry Creek
 18 Schools.
 19 **Q. Okay. Then this one I will ask you a**
 20 **couple questions about, and I'm going to direct your**
 21 **attention -- the print is tiny -- to chapter 1 of this**
 22 **document, page 5. And I'm in the sort of bottom**
 23 **right --**
 24 A. Okay.
 25 **Q. -- portion of it. In the middle of the**

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1 **page on the right side it says, "The Secret Service**
 2 **considers threat assessment to be as important to**
 3 **preventing targeted violence as the physical measures**
 4 **it employs." Do you see that?**
 5 A. I don't, sorry.
 6 **Q. Oh, I'll help you. Now that hopefully**
 7 **you've had a chance to look at that, my question to**
 8 **you is, do you agree with that, that performing threat**
 9 **assessments is as important to preventing targeted**
 10 **violence as physical security measures?**
 11 MR. NATHAN: Esther, if you need to read
 12 the surrounding documents to put it in context, feel
 13 free to do so.
 14 A. Can I take a minute?
 15 **Q. (BY MR. ROCHE) Yes. Absolutely.**
 16 A. I can't speak to the physical measures
 17 without taking -- I don't know -- I feel like I can't
 18 -- I know that threat assessments are important to
 19 helping prevent violence, but I don't know -- I can't
 20 say with certainty if it's the same or as important as
 21 physical measures. And I don't know if you're -- I
 22 don't know if that would be the case in the schools.
 23 **Q. And I'm just asking for your view.**
 24 A. Right. Because this is -- I mean, yeah,
 25 I don't know. I don't -- I can't speak to the

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1 physical measure piece.
 2 **Q. Okay.**
 3 A. But I do think that threat assessments
 4 are an important tool in helping to prevent school
 5 violence.
 6 **Q. And I guess one of the questions that**
 7 **that prompts is if threat assessments are such an**
 8 **important tool in preventing school violence, why,**
 9 **prior to December 13 of 2013, were so few being**
 10 **performed at Arapahoe High School, for instance?**
 11 A. I don't know. I can say if concerns were
 12 brought to our attention that warranted a threat
 13 assessment, they would have been conducted. I don't
 14 know if those concerns were being shared with us.
 15 **Q. And that's what I'm trying to get at. As**
 16 **I mentioned at the beginning of this deposition, one**
 17 **of the things that is front and center of this**
 18 **arbitration is how do we help schools do a better job**
 19 **of preventing the kind of violence that occurred at**
 20 **Arapahoe High School in 2013. And one way may be to**
 21 **do more threat assessments and certainly more**
 22 **comprehensive ones. So given that in the four years**
 23 **prior to -- three years prior to Claire's death, there**
 24 **were only two threat assessments. That just, frankly,**
 25 **surprises me. So my question is, can you give me any**

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1 **information on why there were so few threat**
 2 **assessments at Arapahoe High School between 2008 and**
 3 **December of 2013?**
 4 A. I mean, I honestly think that they -- it
 5 wasn't really part of the culture that Booth had set
 6 up, the prior principal, that a lot of the concerns
 7 that would come up, we would take care of in
 8 problem-solving meetings and have -- I don't feel like
 9 it ever got to a point where there were threats like
 10 that made, or at least I wasn't made aware of them.
 11 But if there were -- I feel like if there were
 12 concerns about a student, we would have
 13 problem-solving meetings. So I honestly can't answer
 14 why there weren't more conducted. I don't have an
 15 answer to that.
 16 **Q. Well, let's talk about the culture at**
 17 **Arapahoe High School, because that certainly is one of**
 18 **the things that we want to explore as part of this**
 19 **arbitration. You mentioned that the culture that Ron**
 20 **Booth had set up was one that didn't lend itself or**
 21 **encourage extensive use of threat assessments; is that**
 22 **a fair statement?**
 23 A. I don't know if it discouraged the use of
 24 them. I think that it just -- a lot of the problems
 25 seemed to be taken care of internally.

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1 **Q. Okay.**
 2 A. Like with having meetings with families
 3 and with teachers, we'd have -- and I can't remember
 4 what they called them there, but we would have like
 5 problem-solving meetings with everyone to discuss a
 6 student, the student's behavior, and with the parents
 7 to see how we could -- if there were solutions we
 8 could come up with.
 9 **Q. And would Mr. Booth generally participate**
 10 **in those meetings?**
 11 A. No. It depended on the family or what
 12 the issue was, but typically there would be an
 13 administrator, counselor, myself, the gen ed teachers,
 14 and the student and parents or a parent.
 15 **Q. And these problem-solving meetings would**
 16 **involve sitting down, talking with the parents,**
 17 **talking with the teachers, and trying to address**
 18 **whatever --**
 19 A. If they were failing --
 20 **Q. -- concerning behaviors there were?**
 21 A. Right. And a lot of times it was failing
 22 grades or if there was -- if there were -- typically
 23 it was if they were poor grades, and then that would
 24 spark the conversation about what was going on with
 25 that student. So we would gather everyone together to

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1 try to figure out if there were other factors or how
 2 we could help support that student. And sometimes it
 3 was a good meeting because the -- not sometimes, it
 4 was always a good meeting because often the teachers
 5 could learn from each other what was helpful in their
 6 classroom, and it might benefit another teacher.
 7 **Q. And one of the reasons that failing**
 8 **grades could be a trigger for that kind of meeting is**
 9 **because a decline in grades could be a sign of some**
 10 **other underlying, more serious problem?**
 11 A. It could be. I think -- I don't know if
 12 the teachers were digging that deep at that point. I
 13 think that when they noticed the student has failing
 14 grades, they would often bring that up to the
 15 counselor. If the counselor had gotten similar
 16 reports from other teachers or if they would come up
 17 -- if there were other issues that might have come up
 18 with discipline, sometimes those same kids -- their
 19 names would come up. So they would have a meeting at
 20 that point.
 21 **Q. Okay. And when we're talking about**
 22 **failing grades, I'm going to bounce around a little**
 23 **bit and ask you to look at Exhibit 3 in this book**
 24 **again and at page 1404. And you'll see in the bold**
 25 **language of numbered paragraph 10 -- again, we're in**

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1 **the staff handbook -- it says that "Teachers are**
 2 **expected to telephone parents of students receiving an**
 3 **'F' grade. Counselors are to telephone parents of**
 4 **students receiving two or more failure grades." Do**
 5 **you see that?**
 6 A. Uh-huh.
 7 **Q. And the reason for that is just what we**
 8 **discussed, correct?**
 9 A. Correct. So that we could try to problem
 10 solve before it would escalate into a bigger concern.
 11 **Q. Okay. Now, when it refers to counselors**
 12 **there, do you understand that to mean you or somebody**
 13 **else?**
 14 A. The guidance counselors.
 15 **Q. So are we talking about Ms. Lou Ellen or**
 16 **are we talking about the grade level folks?**
 17 A. So Mrs. Lou Ellen is the -- was
 18 considered a post grad counselor, but she was not a
 19 counselor.
 20 **Q. Okay.**
 21 A. I don't know if that -- but I -- it means
 22 the counselors. To my understanding, it means the
 23 counselors, the guidance counselors, the four that we
 24 had.
 25 **Q. So, for instance, in Karl Pierson's case,**

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1 **who was responsible for calling his parents and**
 2 **saying, Karl has got a number of F's on his transcript**
 3 **right now, during the fall semester of 2013?**
 4 A. According to this, it would be the
 5 counselor.
 6 **Q. Okay. But I'm asking for who that person**
 7 **would have been.**
 8 A. I'm not sure if it would have been Kelly
 9 Talen at that point or Astrid Thurnau, because Kelly
 10 was on maternity leave, so I don't know when she came
 11 back.
 12 **Q. Okay.**
 13 A. So I don't know when one -- I don't know
 14 when Astrid left and when Kelly came back.
 15 **Q. Okay. Now, going back to the mention you**
 16 **made of the culture at Arapahoe. There is a document,**
 17 **and I'm going to try to find it for you. If you'll**
 18 **look at Exhibit 10 in the binder, you'll see it's just**
 19 **one slide from a very long PowerPoint that was**
 20 **produced to me by the Littleton Public School District**
 21 **as part of this arbitration. And my first question**
 22 **is, do you recall seeing a PowerPoint presentation as**
 23 **part of your time at Arapahoe High School related to**
 24 **culture and climate surveys?**
 25 A. I don't, but I'm sure that there was one,

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1 but I don't remember seeing this.
 2 **Q. Did you ever participate in or review a**
 3 **culture or climate survey at Arapahoe High School?**
 4 A. Yes, but I can't remember when that was
 5 or -- it's very vague to me right now, but I do
 6 remember going over the surveys. But I can't remember
 7 the timeline.
 8 **Q. Okay. Do you recall anything about what**
 9 **the findings or conclusions of that culture and**
 10 **climate survey were?**
 11 A. I don't.
 12 **Q. Do you recall any concerns that were**
 13 **raised as a result of the findings and conclusions of**
 14 **that culture and climate survey?**
 15 A. I don't. But if I had a context of the
 16 year or -- I don't know when this was -- when this
 17 presentation was.
 18 **Q. Okay. Well, what -- and, again, I can't**
 19 **vouch for this, but I heard that this survey was done**
 20 **sometime in 2010 and that Mary Gottlieb, assistant**
 21 **principal at the time, had some role in it. Is that**
 22 **triggering any memories?**
 23 A. I mean, no, not -- it's not triggering
 24 any more memories.
 25 (Deposition Exhibit 38 was marked.)

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1 **Q. And first off, do you recognize**
 2 **Exhibit 38?**
 3 A. I do.
 4 **Q. And Exhibit 38, for the record, is a July**
 5 **2004 document, again, a Secret Service Department of**
 6 **Education report titled "Threat Assessment in Schools**
 7 **a Guide to Managing Threatening Situations and to**
 8 **Creating Safe School Climates," correct?**
 9 A. Correct.
 10 **Q. And have you read Exhibit 38?**
 11 A. I'm assuming I did, because I remember
 12 having it, but it may have been ten years ago that I
 13 read it.
 14 **Q. Okay. As best you can recall, this is**
 15 **something that you read prior to December of 2013?**
 16 A. Yeah, I don't know how thoroughly I read
 17 it, but I know I had it.
 18 **Q. Okay. And you will see partway through**
 19 **there's a Chapter 5 that discusses how to conduct a**
 20 **school threat assessment. Do you see that? I'll give**
 21 **you a minute to get there. It's about in the middle.**
 22 A. Yep.
 23 **Q. Okay. Are you there?**
 24 A. Yep.
 25 **Q. And you'll see on the very next page it**

40

1 **talks about, "The Threat Assessment Process as a**
 2 **Continuum." Do you see that?**
 3 A. Yes.
 4 **Q. What do you understand that to mean?**
 5 A. Can I --
 6 **Q. Yes, of course. Actually, we've been**
 7 **going an hour. Do you want to take a few minutes?**
 8 A. Sure. That would be great.
 9 (Recess taken, 9:58 a.m. to 10:12 a.m.)
 10 **Q. (BY MR. ROCHE) Let me go off on one**
 11 **short tangent. Earlier today you mentioned something**
 12 **called the Second Wind Foundation?**
 13 A. Yes.
 14 **Q. What is that? What do they do?**
 15 A. It's an organization that provides
 16 services for children who are suicidal or at risk of
 17 committing suicide. So they have therapists that
 18 contact them, and they'll provide free sessions for
 19 people who can't otherwise afford counseling.
 20 **Q. And that's a resource -- is that a**
 21 **statewide resource?**
 22 A. Yes.
 23 **Q. And it's available without regard to**
 24 **cost?**
 25 A. Correct. Even -- there are some people

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1 who have been referred who have insurance, but
 2 typically they try to limit it to people who are in
 3 need.
 4 **Q. Okay. And that was a resource that you**
 5 **used as a school psychologist to refer parents to send**
 6 **their students to get the care they need?**
 7 A. Correct. Not all the time, but in
 8 certain cases, it was one of the referrals.
 9 **Q. Okay. Back to the Secret Service**
 10 **Department of Education document, if we could. I was**
 11 **asking you about the threat assessment process being a**
 12 **continuum, and I wanted to get your take on what you**
 13 **understood that to mean.**
 14 A. I mean, I feel like I would have to read
 15 this to really get to understand what they're
 16 considering a continuum.
 17 **Q. Okay. Let me try it from a different**
 18 **angle then. Did you consider it important for the**
 19 **threat assessments that you performed to be more than**
 20 **just a snapshot in time of a student's mental state?**
 21 A. Yes.
 22 **Q. And how would you -- strike that.**
 23 **I take it that meant it was important to**
 24 **you to, as we are doing here today, look backward into**
 25 **that student's history and then look forward and**

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1 **follow up on how the student was doing after the**
 2 **threat assessment?**
 3 A. Yes.
 4 **Q. Some kind of longitudinal perspective on**
 5 **what trend the student was experiencing in his life or**
 6 **her life?**
 7 A. Correct. We usually had a follow-up date
 8 that we would have a meeting.
 9 **Q. Okay. Besides having a follow-up meeting**
 10 **with the student after the threat assessment meeting,**
 11 **what else did you typically do to make sure that the**
 12 **threat assessments that you performed were not just a**
 13 **snapshot in time?**
 14 A. I don't know if I did anything in
 15 particular afterwards, besides having a follow-up
 16 meeting. Usually if it was a general education
 17 student, the counselors or the administrators would
 18 have more contact with that student where they would
 19 be the contact person. If it was a special ed
 20 student, oftentimes myself or the case manager would
 21 be the contact person.
 22 **Q. Okay. I'm going to ask you to turn a**
 23 **couple of pages down in Exhibit 38, and if you can see**
 24 **it, it's on page 47. Down.**
 25 A. I'm sorry, I thought you said 38.

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1 **Q. And you'll see on the right side of the**
 2 **page that the Department of Education and the Secret**
 3 **Service recommend creating a central point of contact.**
 4 A. Correct.
 5 **Q. Do you see that?**
 6 A. I do.
 7 **Q. And the report goes on to explain why**
 8 **that's important. My first question is, do you agree**
 9 **that it's important to have a central point of contact**
 10 **at a school for these threat assessments?**
 11 A. I do.
 12 **Q. And you'll see in the discussion of that**
 13 **point it says, "The threat assessment team should know**
 14 **how to designate a member of the team to serve as the**
 15 **initial point of contact for information of possible**
 16 **concern. The availability of this point of contact**
 17 **should be made known community-wide." Do you see**
 18 **that?**
 19 A. I do.
 20 **Q. Okay. I've got a number of questions**
 21 **about that. First, do you agree with that statement?**
 22 A. I do.
 23 **Q. Okay. So let's break that down at least**
 24 **as it relates to Arapahoe High School. Was there a**
 25 **specified threat assessment team at Arapahoe High**

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1 **School in 2013?**
 2 A. Each case was a different team, depending
 3 on who the student was working with or who was
 4 involved with that student.
 5 **Q. So it was -- there was no --**
 6 A. Are you talking --
 7 **Q. -- established team at the school that**
 8 **said, This is the group of people who are the threat**
 9 **assessment team, correct?**
 10 A. Correct.
 11 **Q. And when -- well, was there a designated**
 12 **member of the threat assessment team who served as the**
 13 **initial point of contact for information of possible**
 14 **concern at Arapahoe High School in 2013?**
 15 A. One person for every threat assessment.
 16 Is that what you're asking?
 17 **Q. No. What I'm asking is the Secret**
 18 **Service and the Department of Education emphasize the**
 19 **importance of designating a member of a threat**
 20 **assessment team to serve as the initial point of**
 21 **contact for information of possible concern, right?**
 22 **And my question is, did Arapahoe High School designate**
 23 **such a member?**
 24 A. I guess I'm a little bit confused. I'm
 25 sorry.

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1 **Q. That's okay.**
 2 A. So are you -- I guess what I'm having
 3 confusion about is whether you're asking about this
 4 threat assessment, the one with Karl and --
 5 **Q. Oh, okay. The answer to that is no. I'm**
 6 **not asking specifically about the threat assessment**
 7 **with Karl right now. Obviously we're going to get**
 8 **into that.**
 9 A. Okay.
 10 **Q. What I'm asking now is more structurally,**
 11 **did Arapahoe High School designate a member of a**
 12 **threat assessment team to serve as the initial point**
 13 **of contact for information of possible concern --**
 14 A. I don't --
 15 **Q. -- as recommended by the Secret Service**
 16 **and the Department of Education?**
 17 A. I don't think there was one designated,
 18 no.
 19 **Q. Okay. And then the same question about,**
 20 **"The availability of this point of contact should be**
 21 **made known community-wide." What did Arapahoe High**
 22 **School do in 2013 to make it known community-wide that**
 23 **there was a designated person to whom they should**
 24 **report information of possible concern?**
 25 A. At the beginning of the year during

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1 faculty meetings, the guidance staff would be
 2 introduced and the administrators and myself. And the
 3 staff would be made aware that if there were concerns,
 4 that they should be able to go and bring their
 5 concerns to those people.
 6 **Q. Okay.**
 7 A. Didn't specify -- I think that there was
 8 -- that year there was counselors by grade, so I think
 9 they just pointed out who was working with specific
 10 grades.
 11 **Q. Okay. And that was a fairly generic**
 12 **introduction, it wasn't specific to threat**
 13 **assessments?**
 14 A. Right. It was just about concerns.
 15 **Q. Okay. And what about -- when I hear the**
 16 **term "community-wide," at least to me that would**
 17 **include not just the faculty and staff but also the**
 18 **students?**
 19 A. Uh-huh.
 20 **Q. Do you agree with that?**
 21 A. Yes.
 22 **Q. And the parents --**
 23 A. Yes.
 24 **Q. -- of those students?**
 25 A. So there would be school letters. There

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1 would also be -- at the start of the year for each
 2 class there would be a meeting for each grade level
 3 that would introduce the counselor and the -- and I
 4 would go to those as well and be introduced. I don't
 5 know what the -- I can't remember what the
 6 introduction would entail, what they were told,
 7 but . . .
 8 **Q. Okay. Well, was anything done to let the**
 9 **students at Arapahoe High School know who the**
 10 **designated contact person was if they heard of a**
 11 **threat?**
 12 A. Sorry, can you repeat that?
 13 **Q. Sure. Were the students ever told, Here**
 14 **is who our designated point of contact is if you hear**
 15 **something threatening?**
 16 A. I don't think it was ever one specific
 17 person. It was, Go to your counselor or go to the
 18 administrators. But I don't think they ever said
 19 there was one person you need to go to.
 20 **Q. Okay. And what about the parents? Was**
 21 **anything communicated to the parents about who the**
 22 **designated member of the threat assessment team was**
 23 **that they should go to with information of possible**
 24 **concern?**
 25 A. I don't know. I know that the Care Line

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1 -- there were different -- that the Care Line was used
 2 by parents. I don't know if they were specifically
 3 told about it through or by the principal or by
 4 Arapahoe. So I don't know.
 5 **Q. Okay. Do you recall whether or not the**
 6 **training that you received at Arapahoe High School on**
 7 **threat assessments included any review of this**
 8 **document?**
 9 A. I don't recall.
 10 **Q. Okay. And you'll see in Exhibit 38, the**
 11 **document that we're looking at, that there's a number**
 12 **of steps that are recommended as part of performing a**
 13 **threat assessment inquiry, correct?**
 14 A. I would have to look at the document.
 15 Sorry.
 16 **Q. Feel free. And you can see they're**
 17 **numbered No. 1, "The Facts that drew attention to the**
 18 **student." No. 2, "Information about the student,"**
 19 **those kinds of things.**
 20 A. Oh, okay.
 21 **Q. Okay. And I don't want to walk you**
 22 **through every single one of these because then we'll**
 23 **be here for days, but let me direct your attention to**
 24 **page 52. Hopefully your eyes are better than mine.**
 25 A. Okay.

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1 **Q. Okay. One of the recommendations is**
 2 **titled "Collateral school interviews." Do you see**
 3 **that?**
 4 A. Yes.
 5 **Q. And it says, "Students and adults who**
 6 **know the student who is the subject of the threat**
 7 **assessment inquiry should be asked about**
 8 **communications or other behaviors that may indicate**
 9 **the student of concern's ideas or intent." And then**
 10 **it goes through a list of questions, right?**
 11 A. Right.
 12 **Q. Was that -- strike that.**
 13 **Was speaking to students and adults who**
 14 **know the student who was the subject of a threat**
 15 **assessment -- was that part of your regular practice**
 16 **in performing threat assessments at Arapahoe High**
 17 **School?**
 18 A. Yes. It depended on the level of
 19 concern.
 20 **Q. Okay. Well, let me -- I'll ask about the**
 21 **threat assessment that was done on Karl Pierson. Did**
 22 **you speak to any students about Karl Pierson as part**
 23 **of your threat assessment inquiry?**
 24 A. No.
 25 **Q. And as I understand it, the adults that**

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1 **you spoke to about Karl Pierson were Tracy Murphy,**
 2 **right?**
 3 A. Correct.
 4 **Q. Kevin Kolasa?**
 5 A. Correct.
 6 **Q. Did you talk to Mark Loptien?**
 7 A. I can't remember. Maybe just about, I
 8 mean, what happened, that incident.
 9 **Q. Did you talk to anybody else about Karl**
 10 **Pierson to get background information on him?**
 11 A. Astrid.
 12 **Q. Astrid?**
 13 A. Yeah.
 14 **Q. Anyone else?**
 15 A. Not that I recall, no.
 16 **Q. None of his teachers?**
 17 A. I can't remember if I talked to them
 18 before or after, so . . .
 19 **Q. Okay.**
 20 A. I don't think so.
 21 **Q. And I will tell you one of the things**
 22 **that I've heard over the course of this process is**
 23 **that there were concerns by teachers about the lack of**
 24 **information sharing by the administration. In other**
 25 **words, teachers weren't even told that a threat**

51

1 **assessment would be done on one of their students. Is**
 2 **that a concern that you've heard in the past as well?**
 3 A. I heard those concerns after the
 4 shooting.
 5 **Q. Was there a culture in 2013 at Arapahoe**
 6 **High School of not sharing with or among faculty**
 7 **members threat assessments and disciplinary concerns**
 8 **about the students at school?**
 9 A. Can you repeat the question? Sorry.
 10 **Q. Sure. Well, one of the issues that has**
 11 **come up repeatedly is FERPA -- do you know what FERPA**
 12 **is?**
 13 A. (Deponent nodded head up and down.)
 14 **Q. And I have seen, as part of the sheriff's**
 15 **investigation, and I have heard as part of this**
 16 **arbitration, that confidentiality concerns created an**
 17 **impediment to effective information sharing among the**
 18 **faculty -- or between the faculty and the**
 19 **administration about students of concern. And my**
 20 **question is, is that your experience at Arapahoe High**
 21 **School that that was a problem or a concern?**
 22 A. I feel like it was definitely a concern
 23 that was brought up post December 2013. But like
 24 prior to, I think there was a feeling that there was
 25 lack of communication about -- I can speak for some of

52

1 my special education students, if they were
 2 disciplined, oftentimes the case manager wouldn't know
 3 until they were already suspended or sometimes it felt
 4 like there was some fact-finding after an incident.
 5 **Q. Okay.**
 6 A. Or after, you know, things would already
 7 happen. So I think there was definitely problems
 8 keeping the line of communication at times.
 9 **Q. Okay. From what you observed after the**
 10 **shooting, did that culture begin to change after the**
 11 **shooting at Arapahoe High School?**
 12 A. I think so.
 13 **Q. Okay. Now, did you actually go back and**
 14 **work in the building after the shooting?**
 15 A. I did.
 16 **Q. Okay. So you were there the entire**
 17 **second semester?**
 18 A. Yes.
 19 **Q. Okay. I want to talk about the threat**
 20 **assessment training that Nate Thompson did, and it's**
 21 **Exhibit 4. You'll probably want to turn your book**
 22 **sideways like I did. Do you recognize this as the**
 23 **PowerPoint presentation that Nate Thompson used as**
 24 **part of the threat assessment training?**
 25 A. I honestly don't remember.

53

1 **Q. Do you remember anything about that**
 2 **training?**
 3 A. I don't. I feel like some of the slides
 4 look familiar but I --
 5 **Q. Okay.**
 6 A. I don't -- I feel like some of them are
 7 familiar because I've seen them at other trainings.
 8 **Q. Okay. Well, why don't you move ahead to**
 9 **the slide that starts with, "Goals for Today," if you**
 10 **would. Okay. Now, this slide indicates that one of**
 11 **the things that Nate Thompson talked about was the**
 12 **purpose and process of conducting an effective threat**
 13 **assessment. Do you see that?**
 14 A. Yes.
 15 **Q. What did you understand to be the purpose**
 16 **of conducting an effective threat assessment?**
 17 A. To help identify students who had
 18 potential risk factors and who were a potential for
 19 committing an act of violence.
 20 **Q. And was a part of that so that you could**
 21 **then get those students the help that they needed to**
 22 **prevent that act of violence from actually occurring?**
 23 A. Yes. I feel like the threat assessment
 24 process is a tool that the school uses as a screener
 25 to try to help in the next steps for a student.

54

1 **Q. Okay. We'll get into the process here in**
 2 **a minute, but the next item on the list of goals for**
 3 **the training that is described here is, "Confirm the**
 4 **roles and tasks of a building Threat Assessment Team."**
 5 **Do you see that?**
 6 A. Yes.
 7 **Q. And, again, I know I've asked you, and**
 8 **I've asked a lot of people, do you have any idea why**
 9 **there was no defined threat assessment team for the**
 10 **Arapahoe High School building?**
 11 A. I don't know if that was the top concern
 12 for Mr. Booth.
 13 **Q. Okay. Well, what about for Ms. Pramenko?**
 14 **She had been principal for about 18 months before**
 15 **Claire was murdered, right?**
 16 A. Uh-huh.
 17 **Q. Did she ever establish a threat**
 18 **assessment team for the building?**
 19 A. Not that I'm aware of.
 20 **Q. And am I right, you're personal friends**
 21 **with Ms. Pramenko, aren't you?**
 22 A. No.
 23 **Q. Did you ever have any discussions with**
 24 **Ms. Pramenko about the need to establish a building**
 25 **threat assessment team?**

55

1 A. I don't know if I did.
 2 **Q. Okay. Now, I take it from the list of**
 3 **goals for today that one of the things that was done**
 4 **as part of this process was discuss and debrief real**
 5 **situations. Do you recall anything about that part of**
 6 **the training?**
 7 A. I really don't remember this training.
 8 I'm sorry.
 9 **Q. No, that's fine.**
 10 A. I don't even know who would have gone
 11 with me.
 12 **Q. Let's jump, I don't know, another**
 13 **half-dozen slides in if you would. There at the top**
 14 **it says, "What does effective Threat Assessment look**
 15 **like?" There.**
 16 A. Sorry.
 17 **Q. That's okay. It's the next one after**
 18 **that slide.**
 19 A. Oh, this way.
 20 **Q. Yes. That one. Got it. And you can see**
 21 **the very first bullet point on this slide says that an**
 22 **important part of an effective threat assessment is to**
 23 **be sure that the school community is aware of early**
 24 **warning signs and reporting procedures. Do you see**
 25 **that?**

56

1 A. Yes.
 2 **Q. Can you tell me anything about what**
 3 **Arapahoe High School was doing in 2013 to make sure**
 4 **that the school community was aware of the early**
 5 **warning signs and reporting procedures?**
 6 A. I can't. I know that we did slide shows
 7 and a video for early warning signs of suicide, but I
 8 can't -- I don't think that included threat
 9 assessments when we were playing those at lunchtime
 10 for students to make sure they were aware of who to go
 11 to, but I don't know.
 12 **Q. Okay. You can see the next point is,**
 13 **"Establish Threat Assessment Teams in each school,"**
 14 **and I think we've covered that. The next bullet point**
 15 **emphasizes the importance of a timely response to**
 16 **imminent and emerging threats. Do you see that?**
 17 A. Yes.
 18 **Q. Can you tell me what Arapahoe was doing**
 19 **in 2013 to ensure that it had a timely response to**
 20 **imminent and emerging threats?**
 21 A. I don't know if I understand the question
 22 correctly. What procedures they had or --
 23 **Q. Yes. I mean, what were they doing to**
 24 **make sure that if there was an imminent and emerging**
 25 **threat that Arapahoe had a timely response to that?**

57	<p>1 A. I mean, I think that we always let</p> <p>2 teachers know that they were our eyes and ears, and</p> <p>3 students know that they were our eyes and ears. And</p> <p>4 if they heard of anything or saw anything that they</p> <p>5 should come and report it. But as far as -- I mean, I</p> <p>6 feel like once a referral was made or something was</p> <p>7 given to an administrator or a counselor, I don't know</p> <p>8 what the response time was or what the expected time</p> <p>9 was.</p> <p>10 Q. Okay.</p> <p>11 A. I don't know if there was an expected</p> <p>12 timeline.</p> <p>13 Q. Okay. And what can you tell me about the</p> <p>14 systematic process to assess the level of concern that</p> <p>15 existed at Arapahoe High School in 2013?</p> <p>16 A. I think it was conducting a threat</p> <p>17 assessment using that tool.</p> <p>18 Q. The form template that was used in this</p> <p>19 case?</p> <p>20 A. Uh-huh. Uh-huh.</p> <p>21 Q. And as best as you can explain, what does</p> <p>22 balance intervention measures refer to?</p> <p>23 A. I have no idea.</p> <p>24 Q. Okay.</p> <p>25 A. I don't know what he was -- what Nate</p>	59
58	<p>1 would have been talking about or thinking of at that</p> <p>2 -- without -- I don't know without talking to him</p> <p>3 about it.</p> <p>4 Q. Okay. And were there any particular</p> <p>5 programs in place at Arapahoe in 2013 that were</p> <p>6 focused on developing a safe and caring culture as</p> <p>7 mentioned toward the bottom of this slide?</p> <p>8 A. I mean, just besides the messages that</p> <p>9 were relayed to students and staff, I don't know if</p> <p>10 there was -- there wasn't any specific programs that I</p> <p>11 knew of.</p> <p>12 Q. Okay. And then the final bullet point on</p> <p>13 this slide refers to ongoing district and community</p> <p>14 support. What kind of ongoing district and community</p> <p>15 support did Arapahoe provide in that regard?</p> <p>16 A. I don't know if there was anything</p> <p>17 community-wide. I think that -- I think there was</p> <p>18 more when I first started in the district, and then I</p> <p>19 don't know if there were -- I don't know what there</p> <p>20 was several years ago, but I think that it was on a</p> <p>21 case-by-case basis that we would offer that support to</p> <p>22 specific families or people as issues arose. But I</p> <p>23 don't know if that was district-wide -- or</p> <p>24 community-wide.</p> <p>25 Q. Okay. Well, what existed several years</p>	60
57	<p>1 ago that falls into this category?</p> <p>2 A. When I first started in Littleton, they</p> <p>3 had parent partnership like forums. So they'd have</p> <p>4 those offered, and I can't remember if it was once a</p> <p>5 month or once every two months, but they would have</p> <p>6 those on different topics that -- around substance</p> <p>7 abuse or different issues that were impacting</p> <p>8 students.</p> <p>9 Q. Okay.</p> <p>10 A. So I remember those, and they had -- I</p> <p>11 don't know -- I don't know what else specifically.</p> <p>12 But those stand out in my head. I remember thinking</p> <p>13 those were really valuable.</p> <p>14 Q. And those stopped at some point --</p> <p>15 A. They did.</p> <p>16 Q. -- during your time there?</p> <p>17 A. Maybe 2010. 2009 or '10.</p> <p>18 Q. And do you have any understanding as to</p> <p>19 why those stopped?</p> <p>20 A. I don't. I don't know if it was budget</p> <p>21 or funding issues. I'm not sure.</p> <p>22 Q. Okay. Again, several slides in there's a</p> <p>23 reference to Safe2Tell. My question is, do you know</p> <p>24 in 2013 did Arapahoe High School do any student</p> <p>25 training on the Safe2Tell program?</p>	60

61

1 appropriate people.

2 **Q. Okay. And I ask because my understanding**

3 **is that Cherry Creek has its own anonymous tip system;**

4 **is that right?**

5 A. They have a Care Line.

6 **Q. LPS didn't have anything like that?**

7 A. Not that I'm aware of.

8 **Q. Okay. The next slide that is part of**

9 **this training program that you attended talks about**

10 **"Warning Signs Training." Do you see that?**

11 A. Yes.

12 **Q. And first bullet point says that there**

13 **should be annual training for all staff on how to**

14 **recognize warning signs, threat, suicide, et cetera,**

15 **and what to do, right?**

16 A. Correct.

17 **Q. And it goes on to say that it should be**

18 **led by the building mental health providers and**

19 **administrators, right?**

20 A. Yes.

21 **Q. And it goes on to say that administrators**

22 **need to be present and supportive, correct?**

23 A. Correct.

24 **Q. And then it discusses that one of the**

25 **purposes is to help differentiate -- help staff**

62

1 **differentiate between imminent versus early warning**

2 **signs, correct?**

3 A. Correct.

4 **Q. Did LPS ever provide annual training for**

5 **all staff on how to recognize the warning signs for**

6 **threats and suicides?**

7 A. I don't think so.

8 **Q. And I take it, then, as the building**

9 **mental health provider, you didn't perform that**

10 **training, did you?**

11 A. Correct.

12 **Q. And I take it that the administrators**

13 **weren't present or supported for any such training,**

14 **correct?**

15 A. Correct.

16 **Q. And as a consequence, the staff at**

17 **Arapahoe High School, unless they did it on their own,**

18 **weren't able to differentiate between imminent and**

19 **early warning signs, were they?**

20 A. Not all staff. After we had some

21 suicides at our school, we actually all -- the entire

22 staff participated in a training, an all-day training

23 on looking at warning signs of suicide.

24 **Q. Okay.**

25 A. So, you know, I know that was just one

63

1 training, but there was training then.

2 **Q. Okay.**

3 A. So I don't know what carryover there was

4 for what staff member.

5 **Q. Okay. Do you know why there was not**

6 **annual training for all staff on how to recognize the**

7 **warning signs for threats, suicides, et cetera, other**

8 **than the training you just mentioned?**

9 A. No.

10 **Q. Was it something that you ever proposed**

11 **to Mr. Booth or Ms. Pramenko to do?**

12 A. No.

13 **Q. And it sounds like even the suicide**

14 **training that you mentioned only happened after there**

15 **had been a number of suicides in a fairly short window**

16 **of time at Arapahoe, right?**

17 A. Right. I think it was in response to

18 that.

19 **Q. How many were there?**

20 A. There were two in 2011, and then there --

21 that I recall. There was several after that date.

22 **Q. Okay. How many suicides were there at**

23 **Arapahoe before -- in the two years before this**

24 **training -- suicide training was finally implemented**

25 **for the staff?**

64

1 A. I don't remember. I don't know if it was

2 -- I don't know if -- those two stood out to me

3 because I -- they were in close succession to each

4 other.

5 **Q. Okay. If you would turn to the next**

6 **slide, it's titled "Turn and Talk." And look through**

7 **these items on the team implementation plan. Do you**

8 **see that?**

9 A. Yes.

10 **Q. Do you recall any discussion of whether**

11 **or not the staff at Arapahoe was trained to recognize**

12 **and respond to warning signs?**

13 A. Sorry. No.

14 **Q. Okay. Let's jump ahead. There's a slide**

15 **titled "Sources of Information." Do you see that?**

16 **Take a minute. It's after this white slide, after**

17 **those too.**

18 A. Yep.

19 **Q. Okay. And is this a list of potential**

20 **sources of information to look at as part of a threat**

21 **assessment inquiry?**

22 A. Yes.

23 **Q. And I understand that these are done on a**

24 **case-by-case basis, but are these all sources that you**

25 **have used in the course of performing threat**

65

1 assessments over your career?

2 A. Yes.

3 Q. And certainly the reports that we looked

4 at earlier today talk about how important it is to

5 make sure that your threat assessment inquiries are

6 comprehensive, right?

7 A. Correct.

8 Q. Because the more information you have,

9 the better decisions you can make, right?

10 A. Right. Can I go back to this?

11 Q. Sure.

12 A. Sorry, the search of the room or home, I

13 don't know if that's been part of anything I've had in

14 a threat assessment. So we might have talked to

15 parents about if there were weapons, but I don't know

16 if I've ever had to actually send somebody over to

17 search.

18 Q. Okay. But that's --

19 A. I just wanted to clarify.

20 Q. And I understand that. But that is

21 certainly one of the potential sources of information

22 that's available to you, correct?

23 A. Correct.

24 Q. If you go a couple slides in, there's a

25 slide titled "Making versus Posing a Threat." That's

66

1 the one. And you'll see down at the bottom it says,

2 "Before ruling out a threat as no big deal, get more

3 information and get a second opinion." Do you see

4 that?

5 A. Yes.

6 Q. And do you agree that that's important?

7 A. I do.

8 Q. In the case of Karl Pierson's threat

9 assessment, did anyone provide a second opinion?

10 A. No. And I don't know if a second opinion

11 -- to me that means also consulting. So I don't know

12 if that's -- I don't know if he was referring to

13 getting consultation or to getting a second opinion

14 with another mental health provider. To me that means

15 consulting.

16 Q. Okay. And the person that you were

17 consulting with was Kevin Kolasa, right?

18 A. Correct.

19 Q. Okay. During the sheriff's investigation

20 into this shooting, Deputy Englert was interviewed.

21 And one of the things that he reported, Englert did,

22 is that Kevin Kolasa told him about the threat that

23 Karl Pierson had made against Tracy Murphy. And

24 Deputy Englert went on to explain that Kevin Kolasa

25 described that threat to James as no big deal. Okay?

67

1 A. Okay.

2 Q. Have you heard that incident?

3 A. I didn't.

4 Q. Okay. Let me ask, did Kevin Kolasa ever

5 express to you that he felt that Karl's threat against

6 Tracy Murphy was no big deal?

7 A. I don't know if he used those words.

8 Q. Did he express that concept to you that

9 it was not a big deal and some other words?

10 A. I don't know if he necessarily put out

11 that concept. I think -- you know, when it happened,

12 when he asked me to be at the reentry meeting, I asked

13 if we should do -- conduct a threat assessment based

14 on a statement. So I don't know if he had thought

15 about -- I don't think he was thinking that it was a

16 violent threat.

17 Q. Did you get the impression from Kevin

18 Kolasa for any reason that he wasn't taking the threat

19 that Karl Pierson had made against Tracy Murphy

20 terribly seriously?

21 A. It's hard for me to say. I don't know if

22 it's -- I feel like we had our hands in so many things

23 at that time that I don't know if -- I don't know if

24 he was flippant about it. I don't know if he was

25 thinking it wasn't a big deal. I don't know if he --

68

1 I don't mean to be vague. I don't know if he thought

2 it wasn't a big deal, but I also don't know if he

3 thought it was that significant of a threat.

4 Q. Can you tell me anything about what he

5 told you about how seriously he, Kevin Kolasa, was

6 taking the threat that Karl Pierson had made against

7 Tracy Murphy?

8 A. I don't know how serious he was taking it

9 because it didn't -- I don't think it crossed his mind

10 to do a threat assessment until it was brought up to

11 his -- brought up to him.

12 Q. And you're the person who brought that up

13 to him?

14 A. Yes.

15 Q. And is it possible that the reason it

16 wasn't occurring to Kevin Kolasa to do a threat

17 assessment was because he had never been trained on

18 how to do one?

19 A. It's possible.

20 Q. Let me ask this, when you were performing

21 the threat assessment on Karl Pierson, did you know

22 that Kevin Kolasa had not been trained on how to do a

23 threat assessment?

24 A. No. I think I --

25 Q. Go ahead.

69

1 A. I think I assumed that all of the
 2 administrators had been.
 3 **Q. Do you now know that that isn't the case?**
 4 A. Yes.
 5 **Q. Were you surprised to learn that Natalie**
 6 **Pramenko, Kevin Kolasa, and several other**
 7 **administrators at Arapahoe High School had not taken**
 8 **the threat assessment training that you had taken**
 9 **prior to December of 2013?**
 10 A. I don't know if I knew who didn't take
 11 it, to be honest.
 12 **Q. Okay.**
 13 A. I didn't know that Natalie hadn't taken
 14 it. But I -- yeah, so I don't know who had not
 15 received the training. I found out that Kevin
 16 hadn't --
 17 **Q. Afterwards?**
 18 A. -- afterwards.
 19 **Q. Okay. How did you learn that?**
 20 A. So I was told that Kevin had said that I
 21 was the expert and that he was not trained in threat
 22 assessments.
 23 **Q. And who told you that?**
 24 A. Steve Everall.
 25 **Q. Okay. Let's jump another six or eight**

70

1 **slides in, and I'll show you the slide that I'm**
 2 **looking at. It's titled "Threat Intervention**
 3 **Continuum." I'm trying to -- sorry, these are**
 4 **numbered, but it's impossible to read. I'll tell you**
 5 **it's slide No. 513. So it's five pages after that.**
 6 MR. NATHAN: There it is.
 7 **Q. (BY MR. ROCHE) There you go. And this**
 8 **slide describes the three different categories of**
 9 **threat assessment levels, right?**
 10 A. Right.
 11 **Q. Low, medium, high, and the gist of this**
 12 **slide is that the higher the threat, the more**
 13 **comprehensive the response, correct?**
 14 A. Correct.
 15 **Q. And this slide makes clear also that even**
 16 **for low level threats, ongoing monitoring is**
 17 **necessary. Do you agree with that?**
 18 A. So it says to monitor, but it's -- I
 19 don't know if there's ever been -- I don't know what
 20 ongoing means. I don't know if that's ever been
 21 clarified if there's -- does that mean for the school
 22 year? Does that mean for the next -- until the
 23 follow-up meeting? I don't think there's that
 24 clarification.
 25 **Q. Okay. Well, did you ever ask anybody**

71

1 **what kind of monitoring was appropriate for low level**
 2 **threats?**
 3 A. I don't -- I don't know if I did or not,
 4 to be honest.
 5 **Q. Okay. Well, what kind of monitoring**
 6 **would you typically perform or ask someone else to**
 7 **perform for students whom you deemed a low level**
 8 **threat?**
 9 A. Typically, we would set up a follow-up
 10 meeting to see how the student had been doing or meet
 11 with the student or the parents, depending on who we
 12 felt should be involved in that meeting. And that was
 13 -- I mean, depending on what happened at that meeting,
 14 I think then we would determine whether there needed
 15 to be more follow-up or if we felt comfortable with
 16 the process as is.
 17 **Q. Okay. And for medium level threats, the**
 18 **intervention continuum describes intervention and**
 19 **mobilize support and resources. Do you see that?**
 20 A. Yes.
 21 **Q. What do those terms mean in the context**
 22 **of the threat assessments that you performed?**
 23 A. I would probably have to look at some of
 24 the threat assessments to see. I don't know how
 25 clearly I'm thinking, I mean, without looking -- I

72

1 think I'd have to look at -- reference some things.
 2 **Q. Sure. Here we've got -- and this is a**
 3 **large stack of threat assessments.**
 4 **(Deposition Exhibit 39 was marked.)**
 5 **Q. And I will tell you Exhibit 39 is a group**
 6 **of approximately -- I think it's exactly 17 threat**
 7 **assessments that were performed at Arapahoe High**
 8 **School over the last several years. Only two of them**
 9 **were performed by you. So take a minute and look at**
 10 **the first two. One is a 2011 assessment, and one is a**
 11 **2012, which I think there was a third one that you**
 12 **performed. But it was after December of 2013. Okay.**
 13 **So as we look at -- well, tell me, after you've had a**
 14 **chance to review them. Okay?**
 15 A. Yes.
 16 **Q. All right. The first threat assessment**
 17 **that's listed relates to an incident that occurred on**
 18 **February 28, 2011. Do you see that?**
 19 A. Yes.
 20 **Q. And this involved a student who made the**
 21 **comment, I wish I had a gun. If I had a bomb, that**
 22 **would be even better. I have visions of bombing the**
 23 **school, correct?**
 24 A. Correct.
 25 **Q. Do you recall that incident?**

73

1 A. I don't recall that specific incident but
 2 I'm -- because the student had a parapro, and I'm
 3 guessing that this is a student that I had in special
 4 education. And, also, based on the monitoring, it
 5 says continued weekly meetings with school psych, I
 6 was already meeting with the student, so I probably
 7 had a different context or relationship with the
 8 student.

9 **Q. Okay. And this was a threat assessment**
 10 **that you performed?**

11 A. Correct.

12 **Q. And you characterize this as a low level**
 13 **of concern, right?**

14 A. Correct.

15 **Q. And as part of this threat assessment,**
 16 **you learned from the father that this student at home**
 17 **had made statements about wanting to blow up the**
 18 **school when he was angry, correct?**

19 A. Correct.

20 **Q. And even though this was a low level of**
 21 **concern and involved a student who was on an IEP, the**
 22 **student was nonetheless suspended, correct?**

23 A. Correct.

24 **Q. Okay. And even though this was a**
 25 **low-level concern, the student was directed to have**

74

1 **follow-up intervention contact with you, his or her**
 2 **case manager, and Darrell Meredith on a weekly basis,**
 3 **correct?**

4 A. Well, meet with me on a weekly basis.

5 **Q. Okay.**

6 A. Not all three of those.

7 **Q. Okay. But there were three people**
 8 **assigned to follow up, correct?**

9 A. Correct.

10 **Q. And then down below that it says**
 11 **community resources and interventions have been**
 12 **reviewed with parents or caretakers, and then there's**
 13 **a handwritten note that says Arapahoe Douglas Mental**
 14 **Health --**

15 A. Network.

16 **Q. -- Network. What can you tell me about**
 17 **what that discussion entailed?**

18 A. I'm assuming from the notes that I
 19 probably gave the parents -- talked to them about
 20 seeking counseling or resources through Arapahoe
 21 Douglas.

22 **Q. And would you follow up with the parents**
 23 **to confirm that they had done so?**

24 A. Not necessarily.

25 **Q. Okay. And let's look at the next threat**

75

1 **assessment that was done in December of 2012. Do you**
 2 **see that?**

3 A. Yes.

4 **Q. And this is a student who got into a**
 5 **fight and had written a rap song that had some violent**
 6 **content, correct?**

7 A. Correct.

8 **Q. And then there was a picture of this**
 9 **person flashing a gang sign and holding a gun, right?**

10 A. Correct.

11 **Q. And this was something that you**
 12 **characterized as a high level of concern, correct?**

13 A. Correct.

14 **Q. Do you recall that incident?**

15 A. I do.

16 **Q. What caused you to conclude that this was**
 17 **a high-level concern?**

18 A. So from looking -- according to this
 19 paperwork and from what I recall, it's because there
 20 were prior hospitalizations for suicidal ideation for
 21 a suicide attempt. There were other mental health
 22 issues, so the student had been involved with mental
 23 health, that he had brought a weapon to school prior.
 24 There was a picture of him with a weapon, so there
 25 were weapons in the home. I think those were the --

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1 there was a history of fighting. I think those were
 2 the big ones. He did have practicing behaviors. He
 3 was shooting things in the backyard, it was reported
 4 too.

5 **Q. Okay. As part of the threat assessment**
 6 **on this student, do you know -- did you or somebody on**
 7 **behalf of the school search this student's backpack?**

8 A. I didn't. I never searched students'
 9 belongings.

10 **Q. Did you ask someone to search any**
 11 **students' belongings?**

12 A. I'm sure that -- that was -- that usually
 13 did happen. I don't recall if I did in this specific
 14 instance, but I'm almost certain that I would have,
 15 that that would have happened.

16 **Q. And I guess that's what I'm trying to get**
 17 **at is, what was your practice in terms of requesting**
 18 **that somebody search a student's belongings as part of**
 19 **a threat assessment?**

20 A. I think that would come up in different
 21 situations. We would have a conversation about it
 22 if -- you know, did anybody check at home, did anybody
 23 check in the school their backpack or their locker.
 24 But I feel like that was common practice. I don't
 25 know if I would specifically say it, but we would all

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1 brainstorm it as a team. But I feel like that would
 2 come up in your team process.
 3 **Q. So that was something that was standard,**
 4 **somebody would bring up, Should we search this**
 5 **student's backpack, car, locker, home, phone --**
 6 A. No.
 7 **Q. -- computer, Facebook page, all of those**
 8 **things?**
 9 A. So I should clarify, because that was not
 10 standard if there was no history or any reason to
 11 believe that the student -- we would ask -- it was a
 12 standard question to ask parents if there were weapons
 13 in the home, but we didn't always search students'
 14 belongings or --
 15 **Q. Right, and that's what I'm trying to get**
 16 **at is when would you request that somebody search a**
 17 **student's belongings? What were the threshold factors**
 18 **that drove that decision?**
 19 A. I think if they had -- if they had
 20 already brought weapons to school in the past, if
 21 there were threats made with a weapon or, you know,
 22 that they would use a weapon. But it wasn't during
 23 every threat assessment.
 24 **Q. Okay. And that's something that candidly**
 25 **I did not see in part of Exhibit 4, the slides that**

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1 **we've been looking at. I don't see anything in there**
 2 **that says, Here is when you should request a search of**
 3 **a student's property or home or car or locker. So**
 4 **I'm --**
 5 A. I don't know if that was ever relayed to
 6 us either.
 7 **Q. And did you, yourself, have -- based on**
 8 **your other training, experience, continuing ed, have a**
 9 **criteria for when you would ask for a search to occur?**
 10 A. No. I mean, I feel like during the
 11 course of a threat assessment, if it would -- you
 12 know, if -- I don't think I had a criteria for each
 13 time that I had conducted a threat assessment, no.
 14 **Q. Okay. Do you recall how you became aware**
 15 **of the pictures on the Web site flashing a gang sign**
 16 **and holding a gun that are described here?**
 17 A. If I remember correctly, I think a
 18 student brought it to a teacher, and a teacher brought
 19 it to us. But honestly I can't say like a hundred
 20 percent.
 21 **Q. Okay.**
 22 A. It wasn't brought to me directly, so I
 23 know I got the information from somebody, but I can't
 24 remember who that was.
 25 **Q. Do you recall as part of this threat**

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1 **assessment did you go to whatever Web site is referred**
 2 **to go see what all was there?**
 3 A. I think that we did to see -- I think
 4 there were different songs, but I can't say with
 5 certainty. I feel like we went on the Web site. What
 6 I recall is that we went on the Web site, but I don't
 7 remember what was exactly on there.
 8 **Q. And you'll see that attached to this**
 9 **threat assessment is a printout from the Web site with**
 10 **the song, Reverbnation. So I assume somebody went and**
 11 **looked at that?**
 12 A. Right.
 13 **Q. But you don't recall if it was you or**
 14 **not?**
 15 A. I feel like we did it as a team. What I
 16 remember is that we were in a room with this team
 17 looking at the Web site.
 18 **Q. And then there's also some photographs**
 19 **that are attached to this threat assessment, and you**
 20 **can see obviously they're blacked out so we can't see**
 21 **who the student is or what was there.**
 22 A. Yeah, I don't know what was there.
 23 **Q. Do you recall how you got these**
 24 **photographs?**
 25 A. I don't.

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1 **Q. And you can see also attached to this**
 2 **threat assessment is one page of the student's**
 3 **behavioral detail report. Do you see that? It's**
 4 **right after the photographs.**
 5 A. Yeah.
 6 **Q. And is that a document that you would**
 7 **review as a matter of course as part of every threat**
 8 **assessment?**
 9 A. Yes, we would look at their log entries
 10 or their discipline report.
 11 **Q. The contact log?**
 12 A. And contact log and the discipline
 13 reports.
 14 **Q. Okay. And why would you do that?**
 15 A. To gather more information going into the
 16 meeting.
 17 **Q. As we were discussing, the level of**
 18 **threat is one of the major factors that drives what**
 19 **level of monitoring or follow-up occurs with respect**
 20 **to that student, correct?**
 21 A. Correct.
 22 **Q. And when I look at this threat**
 23 **assessment, I don't see anything marked for ongoing**
 24 **monitoring, other than that this kid was suspended for**
 25 **three days. Do you see that?**

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1 A. Yes.

2 **Q. So can you tell me why there was no**

3 **ongoing monitoring indicated in this action plan for a**

4 **student who was designated as a high level of concern**

5 **and who had been previously hospitalized for suicidal**

6 **ideation?**

7 A. I can't.

8 **Q. Wouldn't it seem like this is a student**

9 **who ought to have fairly extensive ongoing monitoring?**

10 A. Yes. So I am -- I feel like -- yeah, I'm

11 surprised as well. I feel like I would have -- I feel

12 like there's maybe more context to this, maybe there

13 was further follow-up, but . . .

14 **Q. Okay. Well, you mentioned that you**

15 **recalled this student and this circumstance, correct?**

16 A. I remember -- I don't know if I -- I

17 remember this incident, yes.

18 **Q. Okay. Do you recall what, if any,**

19 **follow-up you did with the student who was the subject**

20 **of this incident?**

21 A. I don't.

22 **Q. Did you have any ongoing meetings with**

23 **him after this threat assessment was performed?**

24 A. I don't remember.

25 **Q. Do you recall if you ever had any**

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1 **conversations with any outside mental health**

2 **professionals who were helping this student?**

3 A. I don't, but I see the note that I asked

4 for Mom to fax release forms to speak with the

5 therapist and psychiatrist.

6 **Q. And do you recall if you ever spoke with**

7 **the therapist and the psychiatrist who are referenced**

8 **here?**

9 A. I don't.

10 **Q. Now, if you'll take a look at the next**

11 **threat assessment, it's from February 2014, and this**

12 **was done a couple of months after Claire was killed,**

13 **right? That one.**

14 A. Okay.

15 **Q. And --**

16 A. Yes.

17 **Q. And this appears to be another threat**

18 **assessment that you performed?**

19 A. I think this was done by Nate or written

20 up by Nate Thompson and I was there.

21 **Q. Okay.**

22 MR. EVERALL: For the record, which one

23 are we looking at?

24 MR. ROCHE: The one that starts on LPSTA

25 00017, February 5, 2014.

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1 **Q. (BY MR. ROCHE) So you did not write up**

2 **this threat assessment?**

3 A. Correct.

4 **Q. Okay.**

5 A. There's no -- I did not.

6 **Q. Well, that may answer one of the**

7 **questions that I had, which is you'll see in this that**

8 **this was a low-level threat assessment, correct?**

9 A. Correct.

10 **Q. And even though it was a low-level**

11 **threat, a number of steps were included in the action**

12 **plan, right?**

13 A. Correct.

14 **Q. One was to move him out of his English**

15 **class?**

16 A. Correct.

17 **Q. Another was to ask the student's current**

18 **teachers to report any concerns?**

19 A. Correct.

20 **Q. Another was to refer the student to some**

21 **place for mental health care?**

22 A. Correct.

23 **Q. And another was to keep the student on a**

24 **security team monitor list. Do you see that?**

25 A. Yes.

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1 **Q. What can you tell me about the security**

2 **team monitor list?**

3 A. I don't know what that is.

4 **Q. Okay. I take it, then, that you weren't**

5 **referring students to the security team monitor list**

6 **as part of your threat assessment protocol at Arapahoe**

7 **High School?**

8 A. Correct.

9 **Q. Okay. And then in addition to all of**

10 **those steps, another element of the action plan for**

11 **this student was a weekly check-in with his counselor?**

12 A. Correct.

13 **Q. Correct. And then there was also**

14 **supposed to be follow-up intervention contact by**

15 **support staff, and then the box "Counselor" is**

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

17 A. Yes.

18 **Q. And then another step was to arrange a**

19 **facilitated meeting with somebody to talk about their**

20 **recent interaction and resolve any lingering issues?**

21 A. Yes, I see that.

22 **Q. Were you part of that?**

23 A. I don't think so.

24 **Q. Okay. And then --**

25 A. I guess it was the counselor.

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1 **Q. Okay. And then down at the very bottom,**
 2 **there's a notation that staff and teachers alerted on**
 3 **a need-to-know basis, and it says that Kevin Kolasa**
 4 **e-mailed this student's current teachers and informed**
 5 **them to alert him of any concerns, correct?**
 6 A. Correct.
 7 **Q. So even though this student was a**
 8 **low-level threat, all of those steps were taken,**
 9 **correct?**
 10 A. Correct.
 11 **Q. And if you move to the back, there's a**
 12 **two-page, single-spaced document that lays out the**
 13 **reasons for the threat assessment and the summary of**
 14 **decision factors and the threat level. Do you see**
 15 **that?**
 16 A. Yes.
 17 **Q. Is that something that Nate Thompson**
 18 **prepared?**
 19 A. Yes.
 20 **Q. Did you ever prepare a similar document**
 21 **for any of the threat assessments that you performed**
 22 **at Arapahoe High School?**
 23 A. I -- no, not based on the ones that we
 24 saw, but I don't know what else you have. I can't
 25 remember if I did, but I don't think I did.

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1 **Q. I don't think you did either. I'm not**
 2 **trying to trick you or trap you. I could tell you**
 3 **that.**
 4 A. I don't think I did. I typically would
 5 write them in the moment or write them as I was going,
 6 but I didn't type them out like that.
 7 **Q. Okay. And you didn't typically write out**
 8 **a summary of the decision factors for how you reached**
 9 **a conclusion what level of threat to assign to a**
 10 **particular student?**
 11 A. I'm sorry, can you repeat that?
 12 **Q. You'll see on page 2 of this document**
 13 **that Nate Thompson listed a summary of factors that**
 14 **led him to conclude that this was a low-level threat,**
 15 **correct?**
 16 MR. NATHAN: He's talking about the
 17 two-page summary.
 18 **Q. (BY MR. ROCHE) Yes, I'm sorry. The**
 19 **two-page summary. So you'll see there that Nate**
 20 **Thompson has written out a summary of the factors that**
 21 **led to his decision to characterize the student as a**
 22 **low-level threat, right?**
 23 A. Yes.
 24 **Q. And having looked at the threat**
 25 **assessments that you performed at Arapahoe, I have not**

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1 **seen a similar explanation, whether typewritten or**
 2 **handwritten or otherwise, that summarized the**
 3 **considerations that led you to characterize a student**
 4 **as a low-level risk or a medium-level risk or a**
 5 **high-level risk, correct?**
 6 A. Right.
 7 **Q. And I'm asking, and, again, I'm not**
 8 **trying to trap you because if I had, I would just show**
 9 **it to you. Was it your standard of practice to write**
 10 **down the factors that led you to conclude that a**
 11 **student was a given level of risk?**
 12 A. No.
 13 **Q. Do you recall why Nate Thompson was**
 14 **involved in the threat assessment that was done on**
 15 **February 5?**
 16 A. He was involved in -- I don't know why
 17 he's -- he -- I don't know why the district or the
 18 school had him come in to do threat assessments then
 19 or after.
 20 **Q. Okay. Typically he wasn't involved with**
 21 **threat assessments before the shooting?**
 22 A. Correct.
 23 **Q. And typically he was involved afterwards?**
 24 A. Correct.
 25 **Q. And nobody explained to you why that**

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1 **changed?**
 2 A. Correct.
 3 **Q. How did you learn that that was --**
 4 A. I didn't know if that was going to be
 5 standard practice. Sorry I cut you off.
 6 **Q. That's okay.**
 7 A. I was assuming there were some concerns
 8 about -- possibly some concerns about my performance.
 9 I mean, that's -- or that they just wanted more
 10 support, district support. But I was never really
 11 told why or when it was happening.
 12 **Q. How were you told that Nate Thompson was**
 13 **going to be participating in threat assessments that**
 14 **you were involved in after the shooting?**
 15 A. I think I was told that day or when we
 16 would be getting people together to do the threat
 17 assessments that he would be part of it.
 18 **Q. And who told you that?**
 19 A. I don't know honestly if he like would
 20 show up at the -- would show up at the school and say
 21 he was involved. I feel like when it would come up,
 22 he was contacted. I don't know if that was Natalie or
 23 what administrator, but then he would be there for the
 24 threat assessments.
 25 **Q. Okay. Did you ever ask anyone at**

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1 **Arapahoe or LPS why he was now going to be part of the**
 2 **threat assessment process?**
 3 A. Yes.
 4 **Q. Who did you ask?**
 5 A. I'm pretty sure I asked Natalie Pramenko.
 6 **Q. And what did she say?**
 7 A. I think that she -- to the best of my
 8 recollection, that it was around just getting more
 9 support in doing them, getting more eyes on the
 10 student. It was never about my -- me not being able
 11 to perform my job. It was -- it seemed to be more
 12 about making sure that we were looking at all angles
 13 or getting more mental health support.
 14 **Q. Okay. And that obviously goes back to**
 15 **what you mentioned a minute ago, which was whether**
 16 **there were any concerns about your performance. Did**
 17 **you ever hear anybody at LPS or Arapahoe express any**
 18 **concern about your performance with respect to threat**
 19 **assessments?**
 20 A. No.
 21 **Q. And did you have this conversation with**
 22 **Natalie Pramenko about the fact that Nate Thompson**
 23 **would be participating in future threat assessments?**
 24 A. I don't know if we had a specific
 25 conversation about him participating in all of the

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1 future threat assessments. I mean, he was there all
 2 throughout the second semester, so I feel like he was
 3 pretty actively involved with Arapahoe. So I don't --
 4 I don't know. I feel like his presence -- he was
 5 there all the time.
 6 **Q. Okay. And I guess that's, you know, just**
 7 **a logistical question. Was he at Arapahoe essentially**
 8 **every day for the second semester of the 2013-2014**
 9 **school year?**
 10 A. I mean, I feel like in the first month or
 11 two, he was there with regularity. I don't know if it
 12 was daily. And then I think as time went on, I think
 13 they felt like they wanted to be less of a presence,
 14 and they wanted, you know, the administrators and
 15 staff to be able to take a little bit more control or
 16 be -- I think they wanted us to be more of the
 17 presence or kind of hand the reins back to us.
 18 **Q. Okay. Where was Mr. Thompson officing at**
 19 **Arapahoe during that second semester?**
 20 A. I don't know if he had a -- I don't know.
 21 I think he was in the main office and using the
 22 guidance counseling office. I don't think he had a
 23 designated spot.
 24 **Q. And do you have an understanding of what**
 25 **he was doing?**

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1 A. Consulting with administration, helping
 2 facilitate some of the groups with kids that were in
 3 different locations in the building. He was trying to
 4 support our staff, but I don't know on a daily basis
 5 what he was doing.
 6 **Q. Okay. Was anybody else from the district**
 7 **in the building on a regular basis that second**
 8 **semester of the 2013-2014 school year?**
 9 A. I mean, Melissa Cooper was there. I
 10 don't know if it was a regular basis. But, I mean,
 11 there was a lot of people from the district in our
 12 building that first several -- you know, the first
 13 couple of months to lend their support. So, I mean, I
 14 say -- but I don't know. A lot of it's very blurry to
 15 me.
 16 **Q. Okay. From what you observed, what was**
 17 **Nate Thompson or Melissa Cooper doing to support the**
 18 **staff or the students at Arapahoe in those first**
 19 **couple of months after the shooting?**
 20 A. You know, there was a lot of, I feel
 21 like, crisis responding, kids who were struggling. So
 22 I felt it was all hands on deck. And so we had a lot
 23 of support from outside resources and other
 24 psychologists in the district. And Nate and Melissa
 25 were also helping out with meeting with students and

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1 groups of kids and helping where they could. I feel
 2 like filling in the holes. I feel like initially the
 3 first couple of weeks too there was -- and I don't
 4 know if they were -- I feel like some teachers needed
 5 -- you know, would have difficulty being in
 6 classrooms. So there would be different people
 7 helping out covering classrooms and stuff. So I don't
 8 know if they did that, but they may have.
 9 **Q. Okay. Let's take a look at Exhibit 5, if**
 10 **we could.**
 11 A. Where is Exhibit 5?
 12 **Q. It's in here.**
 13 A. Oh, sorry.
 14 **Q. No, you're fine. And you'll see that**
 15 **Exhibit 5 is a document from the Colorado School**
 16 **Safety Resource Center titled "Essentials of School**
 17 **Threat Assessment: Preventing Targeted School**
 18 **Violence," right?**
 19 A. Yeah.
 20 **Q. And it's dated July of 2013. Is this a**
 21 **document that you were familiar with prior to the**
 22 **shooting that occurred at Arapahoe High School?**
 23 A. Can I look through it?
 24 **Q. Sure.**
 25 A. I don't remember seeing it.

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1 **Q. Okay. Have you seen it since the**
 2 **shooting?**
 3 A. Not that I'm aware of.
 4 **Q. Okay. Let's take a look at Exhibit 9,**
 5 **and I will tell you that Exhibit 9 is a document that**
 6 **was provided to me by Littleton Public Schools, and**
 7 **you'll see it's a description of the threat**
 8 **assessment/danger assessment training that was done at**
 9 **Littleton Public Schools.**
 10 A. Yes.
 11 **Q. And then on the second page of this**
 12 **document is a list of the Arapahoe High School staff**
 13 **who attended the training. Okay. And you'll see that**
 14 **your name appears as having participated in the**
 15 **training that we've been talking about in February of**
 16 **2011, right?**
 17 A. Right.
 18 **Q. And it says Darrell Meredith, Kirk Bast,**
 19 **Scott Wadsworth, and Steve Sisler, and that it was a**
 20 **two-hour program. Do you recall -- I know we've**
 21 **covered this in some respect, but do you recall those**
 22 **other people being at that training?**
 23 A. I don't. Although, I mean, Darrell and I
 24 would do -- Darrell, since he was the head of safety
 25 and security, we did a lot of trainings together that

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1 -- so I don't know if it was this particular one. I'm
 2 assuming it was, but we had done several together.
 3 **Q. Okay. You do recall, though, after the**
 4 **shooting Kevin Kolasa telling you that he had not**
 5 **received any threat assessment training?**
 6 A. Kevin Kolasa did not say that to me
 7 directly.
 8 **Q. Oh, okay. How did you learn that Kevin**
 9 **Kolasa had not received any threat assessment**
 10 **training?**
 11 MR. EVERALL: Could we stop for a minute
 12 on this? I would like to talk to Andy outside for a
 13 bit.
 14 MR. ROCHE: Is there an objection to the
 15 question? I actually do want --
 16 MR. NATHAN: I think there is a concern
 17 about privilege, and if so, it's appropriate for us
 18 to --
 19 MR. ROCHE: Well, if you've got a
 20 privilege concern, that's a different issue, and I'm
 21 happy to take a break on that.
 22 MR. EVERALL: That's part of it.
 23 MR. ROCHE: Okay. If that's the issue,
 24 then sure.
 25 (Recess taken, 11:40 a.m. to 12:42 p.m.)

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1 MR. NATHAN: Okay. When we took the
 2 break, it was to discuss a matter of privilege. The
 3 reason that I was concerned is I don't know this case
 4 well enough to know where my client has gotten all of
 5 her information. If it came from Mr. Everall before I
 6 represented her, I believe from discussions with her
 7 and Steve, that there was an attorney-client
 8 relationship established until I came into the case.
 9 And, therefore, I should object on the basis of the
 10 attorney-client privilege.
 11 Having said that, I've instructed Esther
 12 that if the source of information was Steve Everall
 13 before I came into the picture, then she should
 14 indicate that she has a question of privilege. At the
 15 same time, she's indicated that one of the pieces of
 16 information that she attributed to Steve was actually
 17 not from Steve, according to her recollection that she
 18 wants to correct that portion of the testimony.
 19 MR. ROCHE: Okay. I will bear all of
 20 that in mind.
 21 **Q. (BY MR. ROCHE) And why don't you tell us**
 22 **what it is that you would like to correct.**
 23 A. It was about when I said that Kevin had
 24 referred to me as the expert and had not been trained,
 25 I'm not clear as to where exactly I got that

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1 information in the line of -- like in that --
 2 **Q. Okay.**
 3 A. -- time frame, so . . .
 4 **Q. So it might have been from Mr. Everall,**
 5 **it might have been some other source?**
 6 A. Correct.
 7 **Q. But it is clear that you were informed**
 8 **that Kevin Kolasa had not been trained on how to**
 9 **perform a threat assessment, correct?**
 10 A. Correct.
 11 **Q. And I want to clear that up, because this**
 12 **is now the second time in a deposition that a witness**
 13 **has, after an interruption by Mr. Everall, changed**
 14 **their testimony about whether or not -- or modified**
 15 **their testimony about whether or not Kevin Kolasa**
 16 **received that training, because that is a significant**
 17 **concern that everybody on this side of the table has.**
 18 **Absolutely no reflection on you whatsoever, but it's**
 19 **important to us to get to the bottom of whether or not**
 20 **Kevin Kolasa received that training. And it's clear**
 21 **in your mind that based on what you were told, that he**
 22 **had not received that training, correct?**
 23 A. Correct.
 24 **Q. I appreciate that. Let's talk now about**
 25 **the threat assessment that was done in connection with**

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1 the incident involving Karl Pierson's threat against
 2 Tracy Murphy, and I do have copies of those.
 3 A. Do I still need this?
 4 Q. You actually need this book, because it's
 5 Exhibit 35, but keep that one handy because we're
 6 going to be referring back to it as well. Do you
 7 recognize Exhibit 35?
 8 A. I do.
 9 Q. And is that your handwriting on
 10 Exhibit 35?
 11 A. Yes.
 12 Q. How did you first become aware of the
 13 threat that Karl Pierson voiced against Tracy Murphy?
 14 A. I believe I was told by Kevin.
 15 Q. Okay. And do you recall when that
 16 happened?
 17 A. I think that it was the day after. I
 18 don't think it was that day, because I think it was
 19 after school. So I think it was the following day.
 20 Q. Okay. And what did Kevin Kolasa tell
 21 you?
 22 A. What I recall is that he said Tracy had
 23 met with Karl and his mother to let him know that he
 24 would not be involved in leadership on the speech and
 25 debate team that year and that he was pretty upset and

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1 he was overheard in the parking lot by Mr. Loptien
 2 saying, I'm going to kill that guy.
 3 Q. Where was this conversation with
 4 Mr. Kolasa?
 5 A. I don't remember. I don't remember if it
 6 was in his office or in my office or -- yeah, I don't
 7 know.
 8 Q. Do you recall how long of a conversation
 9 it was?
 10 A. I don't think the initial conversation
 11 was that long.
 12 Q. Okay.
 13 A. I don't know length of time.
 14 Q. Prior to being told that Karl Pierson had
 15 threatened to kill Tracy Murphy, had you ever heard of
 16 Karl Pierson?
 17 A. So I didn't recall at the time, but then
 18 looking back, I think we had received an e-mail a year
 19 prior, or I had, that was to myself and his counselor
 20 about getting upset in the classroom. But besides
 21 that e-mail, I didn't have any working knowledge of
 22 Karl.
 23 Q. Okay. Didn't know him by reputation,
 24 even?
 25 A. No.

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1 Q. You had never spoken to him, as far as
 2 you know?
 3 A. As far as I know, I was told he was a
 4 student assistant in the counseling office, but I
 5 don't know when exactly that was. I didn't have a lot
 6 of interaction with the student assistants, unless I
 7 needed a pass run, but there was a slot to do that, so
 8 I didn't have a lot of interaction with the student
 9 assistants.
 10 Q. So at the time that Kevin Kolasa told you
 11 that Tracy Murphy -- or that Karl Pierson had
 12 threatened to kill Tracy Murphy, your mind was,
 13 relatively speaking, a blank slate about this kid,
 14 right?
 15 A. Correct.
 16 Q. Because you didn't know anything about
 17 him?
 18 A. Correct.
 19 Q. And when you heard about this threat that
 20 Karl had made, what was your response?
 21 A. Should we do a threat assessment?
 22 Q. Okay. And is that something you were
 23 asking Kevin Kolasa because that was --
 24 A. No. Well -- sorry.
 25 MR. NATHAN: Let him finish his question.

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1 Q. (BY MR. ROCHE) And the reason I'm
 2 asking, and we'll break it down. Earlier today, you
 3 mentioned that you had asked Kevin whether a threat
 4 assessment was appropriate, and I want to follow up on
 5 that. Was that a question that you asked him?
 6 A. I believe so. I don't know if I asked
 7 him or I said, I think we need to do one.
 8 Q. Okay.
 9 A. So I don't know if it was asked or it was
 10 presented to him.
 11 Q. Well, that was going to be my next
 12 question is, whose idea was it to do the threat
 13 assessment?
 14 A. What I recall is that it was mine.
 15 Q. Okay. And had you encountered a
 16 situation where a student had threatened to kill a
 17 teacher previously in your career, or was this the
 18 first time?
 19 A. I think that was -- that was the first
 20 time. I think there were -- right, first time.
 21 Q. Okay. And from what I've seen, you had
 22 not done a threat assessment in almost a year prior to
 23 this, correct?
 24 A. Correct.
 25 Q. And that you had only done two in the

101

1 previous four years, right?

2 A. Correct.

3 Q. So after the decision was made whether it

4 was yours or Kevin's or some combination of that, did

5 you do anything to refresh your memory about how to do

6 a threat assessment before actually conducting this

7 one?

8 A. No.

9 Q. Did you have any discussions with Kevin

10 about what an effective threat assessment involved?

11 A. No.

12 Q. Did you speak with anybody other than

13 Kevin Kolasa about who should be involved in the

14 threat assessment process?

15 A. In this threat assessment?

16 Q. Yes.

17 A. No, not -- no, not that I recall.

18 Q. And, again, I'm going to point you to a

19 document, you are free to refer to it. Exhibit 11 is

20 a list of questions and answers in writing that

21 Littleton Public Schools answered as part of this

22 case. And I would jump to page 14 of those, and

23 you'll see at the bottom it says, "Describe in detail

24 the entire investigation, inquiry, analysis, or

25 interviews performed as part of the threat assessment

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1 performed with respect to Karl Pierson in September

2 2013. In responding to this Interrogatory, identify

3 every document that Esther Song reviewed, every person

4 with whom she spoke, any other information that she

5 considered." And you can see there's an answer there,

6 but it's for Littleton Public Schools, it's not your

7 answer. So I point that out simply as a reference

8 point, because I really am not trying to trap you in

9 something that was said here and is different now. I

10 just want to make that available to you. Okay?

11 A. Okay.

12 Q. When you mentioned or discussed with

13 Kevin Kolasa the idea that it was appropriate to

14 perform a threat assessment, what was his reaction?

15 A. I'm sorry, can you repeat the question?

16 Q. Sure. When you and Kevin Kolasa were

17 talking about doing a threat assessment, did he agree

18 that was an appropriate step, or did he think that was

19 overkill?

20 A. No, I think he thought it was proper.

21 Q. Okay. And during your conversations with

22 him, Kevin Kolasa, about the threat assessment

23 process, did he ever indicate to you whether he had

24 done a threat assessment in the past?

25 A. No.

103

1 Q. And I take it from your earlier testimony

2 that when you were doing the threat assessment on Karl

3 Pierson, you did not know that Kevin Kolasa had never

4 been trained on how to do one?

5 A. Correct.

6 Q. Now, in the threat assessment document,

7 Exhibit 35, there's a template, if you will, right?

8 A. Right.

9 Q. And it identifies who the threat

10 assessment team usually consists of, right?

11 A. Correct.

12 Q. And that would be the administrator, that

13 would be Kevin Kolasa, correct?

14 A. Correct.

15 Q. The school psychologist or social worker,

16 that would be you?

17 A. Correct.

18 Q. A counselor assigned to the threat

19 assessment team?

20 A. Correct.

21 Q. And no counselor was assigned to a threat

22 assessment team for this threat assessment, right?

23 A. Correct.

24 Q. And so no counselor participated in this

25 threat assessment, right?

104

1 A. Right.

2 Q. And it says the school resource officer

3 as needed or available?

4 A. Right.

5 Q. And the school resource officer did not

6 participate in this threat assessment, did he?

7 A. Correct.

8 Q. And then another person who is usually on

9 the threat assessment team is a teacher, counselor, or

10 other person who knows the student. Do you see that?

11 A. Yes.

12 Q. And in the threat assessment that was

13 done on Karl Pierson, it did not include a teacher,

14 counselor, or other person who knew Karl, correct?

15 A. His parents.

16 Q. His parents. Okay. But no teacher and

17 no counselor?

18 A. Correct.

19 Q. Can you tell me why not?

20 A. I'm -- I know that Kevin spoke with

21 Loptien beforehand and with Tracy Murphy, so I thought

22 that -- I mean, I think the information was gathered

23 from them by Kevin, so that's why we didn't have

24 anybody there.

25 Q. Okay. Why wasn't the school resource

105

1 **officer included in the threat assessment team for**
 2 **this threat assessment?**
 3 A. I know that Kevin had talked to James
 4 Englert prior to, so I think because there wasn't any
 5 criminal action or any ticketing or anything that was
 6 going to be happening, but I don't know. I don't have
 7 an answer to that besides the one I just gave you.
 8 **Q. Okay. And why wasn't a school counselor**
 9 **assigned to the threat assessment team for this threat**
 10 **assessment?**
 11 A. I don't have an answer for that either.
 12 I know Kelly Talen was on maternity leave, so I don't
 13 know -- again, I spoke to that before, that there was
 14 an interim counselor. So I don't know if that's part
 15 of the reason why that happened.
 16 **Q. Okay. And you would agree with me,**
 17 **wouldn't you, that being a part of the threat**
 18 **assessment team is different from being one of the**
 19 **sources of information that that team evaluates,**
 20 **right?**
 21 A. Correct.
 22 **Q. So being on the team means you gathered**
 23 **the information and then you evaluate it and then you**
 24 **decide what actions are necessary, correct?**
 25 A. Correct.

106

1 **Q. And asking Mark Loptien or somebody else**
 2 **what happened isn't the same as having them on the**
 3 **team participating in the evaluation?**
 4 A. Yeah, I mean, it's not the same thing.
 5 **Q. Right. So I guess my question is, we've**
 6 **got a list of six different types of professionals or**
 7 **paraprofessionals who are meant to be on the threat**
 8 **assessment team, and of those six, four were not. Can**
 9 **you tell me why they weren't part of the team?**
 10 MR. NATHAN: I'm going to object to the
 11 form of the question. You may answer.
 12 A. I can't, but even reading on this thing,
 13 I'm not absolving myself of any responsibility in
 14 doing that. But it also says the administrator should
 15 assemble a building threat assessment team and staff.
 16 **Q. (BY MR. ROCHE) Agreed. And I'm not**
 17 **saying that it was your job to do it. I'm just asking**
 18 **if you have an answer as to why those -- all six of**
 19 **those people weren't included on the team?**
 20 A. I don't. And I don't know if all six are
 21 expected to be on the team. I mean, even according to
 22 this, it says as needed. But I don't have an answer
 23 for that.
 24 **Q. Okay. You mentioned that Kevin Kolasa**
 25 **spoke to both Mark Loptien and Tracy Murphy prior to**

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1 **this threat assessment being conducted, right?**
 2 A. Right.
 3 **Q. Did you speak to Tracy Murphy or Mark**
 4 **Loptien prior to this threat assessment?**
 5 A. I know I spoke to them afterwards, and I
 6 can't recall if I spoke to Tracy before or immediate
 7 -- you know, after, but I -- so I don't know the
 8 timeline. Honestly, I don't know if it was before or
 9 after.
 10 **Q. Okay. And you mentioned that you had a**
 11 **conversation with Kevin Kolasa where he related to you**
 12 **what Mark Loptien had told him. Did you also have a**
 13 **conversation prior to the threat assessment where**
 14 **Kevin shared with you what Tracy Murphy had told him,**
 15 **again, before the threat assessment?**
 16 A. What Tracy had told him about the
 17 incident?
 18 **Q. Yes.**
 19 A. Yes.
 20 **Q. Tell me about your conversation with**
 21 **Kevin Kolasa prior to the threat assessment.**
 22 A. He just told me the same thing that --
 23 not the same thing, but the beginning part of that,
 24 that he -- Tracy had had a conference or a meeting
 25 with Karl and his mother after practice and informed

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1 him that he would not be part of the speech and debate
 2 leadership or -- I don't know what they call it, but I
 3 think the leadership and that he left and he was very
 4 upset.
 5 **Q. Did Kevin tell you anything about what he**
 6 **had learned about Karl's tone of voice, mannerisms,**
 7 **physical behavior as this threat was being made?**
 8 A. Not that I recall.
 9 **Q. So he didn't tell you that Mark Loptien**
 10 **described it as the sound of an animal dying?**
 11 A. No.
 12 **Q. Didn't tell you he was waving his arms**
 13 **and screaming and yelling and gesticulating wildly,**
 14 **anything like that?**
 15 A. I never heard about him sounding like an
 16 animal dying. I knew that he was upset. I don't know
 17 if I heard those words about him waving his arms in
 18 the air. I don't know if I heard those descriptions.
 19 **Q. Okay. In this sort of instructional**
 20 **bubble on the threat assessment and action plan**
 21 **document, it mentions the fact that "It is important**
 22 **that information be shared among all the team**
 23 **members." Do you see that?**
 24 A. Uh-huh. Yes.
 25 **Q. Wouldn't that have been important**

109

1 information for Mr. Kolasa to share with you?

2 A. Yes.

3 Q. These instructions go on to say that "The

4 information for this assessment can be gathered from

5 sources that include eyewitness reports, academic and

6 discipline records, staff/parent observations, and

7 student interview." Do you see that?

8 A. Yes.

9 Q. As part of this threat assessment

10 process, did you pull Karl Pierson's academic records?

11 A. I'm sure I looked at them. I don't know

12 if -- I'm sure I looked at them.

13 Q. Do you recall what his academic records

14 showed in terms of a trend or a pattern?

15 A. I don't recall.

16 Q. Did you make any notes of what you did in

17 connection with this threat assessment other than what

18 exists on Exhibit 35?

19 A. Whatever you have is what exists.

20 Q. Okay. You don't have a notebook or

21 didn't keep anything separate from this?

22 A. No. I had a file, and it was all gone

23 when I returned to the school. I mean, it was all --

24 I didn't have anything. Like it was the threat

25 assessment and --

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1 Q. Did you keep a separate file?

2 A. I don't have a separate file. There was

3 log entries. If there was a log entry, it would be in

4 there, but I don't have separate notes. Whatever I

5 took was on here.

6 Q. Okay. Well, when you said you got back

7 to the school, the file was all gone. What are you

8 referring to?

9 A. Just my file, because I keep a copy of

10 the threat assessment or whatever I had. I looked to

11 see if there was anything in the file cabinet because

12 I keep a copy of my -- if there is any copy of things.

13 Q. So did you --

14 A. I don't -- I mean, I don't have anything.

15 I don't remember there being anything more than this.

16 Q. And I guess what I'm trying to get at is

17 was there a threat assessment file or was there a Karl

18 Pierson file?

19 A. Just a threat assessment file.

20 Q. And it was just for this threat

21 assessment?

22 A. Well, I guess it must have been a Karl

23 Pierson file with the threat assessment in it. I

24 didn't have any other contact with him.

25 Q. Okay. As part of your preparation to do

111

1 this threat assessment, did you also pull the

2 disciplinary records on Karl Pierson?

3 A. As part of my preparation for this?

4 Q. Yes, for the threat assessment that you

5 performed.

6 A. Oh, for -- I'm sure I looked at them, but

7 I don't think there was anything -- as far as I

8 remember, I don't think there -- I think there was

9 like -- I don't know if there was any suspensions or

10 -- I don't know. I'd have to look back and refer.

11 Q. Well, as you sit here today, do you

12 recall anything about Karl Pierson's previous

13 disciplinary history that affected your evaluation of

14 him in September of 2013?

15 A. No.

16 Q. And you don't recall whether he had been

17 suspended?

18 A. I don't think he had been suspended. I

19 think there was something about the incident in his

20 math classroom the year before, but that's all I

21 recall.

22 Q. Okay. And in addition to looking at his

23 academic record and his disciplinary record, did you

24 review any other documents as part of your threat

25 assessment?

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1 A. I don't believe so.

2 Q. And did you or, to your knowledge, Kevin

3 Kolasa take any written statements from anybody as

4 part of this threat assessment process?

5 A. I never did. That was never part -- I've

6 never done that. So I didn't -- I don't know if Kevin

7 did.

8 Q. I have heard over the course of this that

9 Kevin Kolasa referred to Karl Pierson as either the

10 strangest kid he ever encountered or one of the

11 strangest kids he ever encountered in education. My

12 question to you is, did Kevin share that with you at

13 any point?

14 A. I don't believe so. I don't know if I

15 heard those -- I don't know if I recall that.

16 Q. Is that something that would have been

17 useful for you to know?

18 A. Sure. I'd have to know, I mean, I guess

19 what context he was talking about, because I think

20 it's strange. I don't know. I'd want some more

21 explanation.

22 Q. And the only way to get that explanation

23 is if he would have shared that with you because then

24 you could have asked him, What do you mean, right?

25 A. Right.

113

1 **Q. Did you, as part of looking into or**
 2 **preparing for this threat assessment, have any contact**
 3 **or pull any law enforcement records that may have been**
 4 **there?**
 5 A. No.
 6 **Q. Wouldn't that have been important for you**
 7 **to know whether or not Karl had any criminal**
 8 **background?**
 9 A. Sure.
 10 **Q. So can you tell me why you didn't make**
 11 **any effort to find out whether or not Karl had a**
 12 **criminal background?**
 13 A. I believe that we did ask family.
 14 **Q. Okay. But you did not ask law**
 15 **enforcement to try to verify whatever you got on that?**
 16 A. I did not, and I guess that isn't -- I
 17 have -- that wasn't my practice to do that with every
 18 threat assessment.
 19 **Q. So you mentioned that you pulled Karl's**
 20 **contact log and behavioral detail report, correct?**
 21 A. Yes.
 22 **Q. Let's look at those. They are**
 23 **Exhibit 24. So the reason you were looking -- well,**
 24 **tell me why were you looking at the behavioral detail**
 25 **report.**

114

1 A. To see if there was a past history of
 2 aggression or discipline.
 3 **Q. And do you recall what you learned from**
 4 **looking at his behavioral detail report?**
 5 A. I didn't -- I mean, I don't think that --
 6 I think, looking at this, I don't know what I was
 7 thinking when I -- two years ago. I don't -- or
 8 two-and-a-half years ago when I looked at it.
 9 **Q. Okay. And the reason I ask is this**
 10 **behavior of detail report shows a history of violence**
 11 **and aggression, doesn't it?**
 12 A. Yes.
 13 **Q. It shows that back in 2003, he hit two**
 14 **students with a lunch box when he was eight years old**
 15 **because they weren't moving fast enough in the lunch**
 16 **line, right?**
 17 A. Right.
 18 **Q. Did you remember that prior to --**
 19 A. I didn't.
 20 **Q. And it also shows an incident in December**
 21 **of 2003 where he kicked a student in the stomach and**
 22 **hit another student in the head while they were**
 23 **sitting on a wall. Do you see that incident as well?**
 24 A. Yep, I do.
 25 **Q. And incidents of youthful aggression are**

115

1 **one of the important factors to look at in performing**
 2 **a threat assessment, aren't they?**
 3 A. Past history.
 4 **Q. Right. And did you have any discussion**
 5 **with Mr. Kolasa about these two incidents of violence**
 6 **and aggression as part of this threat assessment**
 7 **process?**
 8 A. I don't believe so.
 9 **Q. Did you discuss the fact that Karl had a**
 10 **history, going back a long ways, of violence and**
 11 **aggression with anybody as part of the threat**
 12 **assessment that you performed?**
 13 A. I don't believe so.
 14 **Q. And if you look at Exhibit 19, you said**
 15 **you also looked at this contact log?**
 16 A. Yes.
 17 **Q. Right. And, again, you were looking for**
 18 **other red flag behaviors or attitudes, right?**
 19 A. Correct.
 20 **Q. And that's because a history of violence,**
 21 **aggression, and any number of other behaviors or**
 22 **attitudes could and should influence how you performed**
 23 **your threat assessment, right?**
 24 A. Correct.
 25 **Q. And the contact log shows multiple**

116

1 **incidents, doesn't it, that could fairly be**
 2 **characterized as violent or aggressive attitudes,**
 3 **right?**
 4 A. One prior to the incident.
 5 **Q. Okay. And that one is the November 2011**
 6 **incident where he told a kid to go cut or gut himself,**
 7 **right?**
 8 A. Yes.
 9 **Q. And where he said he was going to make**
 10 **other kids his bitch because he had been bullied his**
 11 **whole life?**
 12 A. Yes.
 13 **Q. And is that something that stood out**
 14 **about Karl Pierson as you were performing his threat**
 15 **assessment?**
 16 A. It was something, yes, I'm sure that we
 17 took into consideration.
 18 **Q. And what did that incident tell you as**
 19 **you were -- or I guess how did you take that incident**
 20 **into consideration as you were performing this threat**
 21 **assessment?**
 22 A. That he had a history of feeling bullied.
 23 **Q. And that's one of the specific factors**
 24 **that you look at when you're performing a threat**
 25 **assessment, right?**

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1 A. One of them, yes.

2 **Q. And in looking at this contact log, and**

3 **in looking at the behavioral detail log, there's no**

4 **reference to a suspension of Karl Pierson, is there?**

5 A. Where was the behavior log?

6 **Q. Oh, it's 24. Here, I've got an extra**

7 **copy. You can look at both at the same time.**

8 A. I don't see any.

9 **Q. Okay. And you had mentioned an incident**

10 **involving a math class, that was Dan Swomley's class,**

11 **right?**

12 A. Correct.

13 **Q. And that doesn't appear in either of**

14 **these two school records, does it?**

15 A. No.

16 **Q. Were you aware at the time that you**

17 **performed the threat assessment on Karl Pierson that,**

18 **in fact, he had been suspended for an outburst in**

19 **Mr. Swomley's class?**

20 A. I didn't know he was suspended for it.

21 Well, I wasn't aware of -- I don't think I was aware

22 of the incident until after.

23 **Q. Oh, so you didn't even know about the**

24 **March of 2013 incident?**

25 A. I don't think so, no.

118

1 **Q. Okay. Would that have been something**

2 **that would be important for you to know about as part**

3 **of performing a threat assessment?**

4 A. Yes.

5 **Q. Have you had any discussions with anybody**

6 **since the shooting about why that information wasn't**

7 **shared with you or included on those records?**

8 A. I don't believe so.

9 **Q. So other than the behavioral detail log**

10 **and the contact log and his academic -- I mean, his**

11 **grades, did you look at anything else as part of your**

12 **threat assessment of Karl Pierson?**

13 A. In the documentation?

14 **Q. Yes.**

15 A. I don't think so.

16 **Q. And I want to be as clear as I can on**

17 **that, that's all the documents you looked at?**

18 A. I believe so.

19 **Q. And the people you spoke to prior to the**

20 **threat assessment were Kevin Kolasa, right?**

21 A. Right.

22 **Q. And you don't know, but maybe Tracy**

23 **Murphy, but you can't remember if that was before or**

24 **after?**

25 A. Correct.

119

1 **Q. And anyone else?**

2 A. Maybe Astrid. I don't know.

3 **Q. What else did you do to prepare for the**

4 **threat assessment other than review those documents**

5 **and talk to those individuals?**

6 A. I don't know if I did anything else.

7 **Q. And the reason I ask is I'm looking at**

8 **Exhibit 4. It talks about all the sources of**

9 **information that the participants on a threat**

10 **assessment team should at least consider examining.**

11 **One is past and present school records, right? And**

12 **we've talked about the school records you've looked**

13 **at, right?**

14 A. Right.

15 **Q. The next one is Internet, written, and**

16 **artistic materials. I take it you didn't look at any**

17 **Internet, written, or artistic materials from Karl?**

18 A. There was no indication that there was

19 any to look at.

20 **Q. What does that mean?**

21 A. Usually we look at those if there's, you

22 know, something written in an English class or there

23 is something brought to our attention, you know, that

24 there's something that somebody drew or something -- a

25 poem or something that was written on a Web site,

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1 we'll look at that source of information. But we

2 don't necessarily go looking for it unless there's an

3 indication that there was that information to look

4 for. Does that make sense?

5 **Q. Well, let me ask this, did you ask Karl's**

6 **teachers, Has he written anything concerning or drawn**

7 **anything concerning?**

8 A. I did not.

9 **Q. Why not?**

10 A. I don't have an answer for that.

11 **Q. And did you or anybody from the school**

12 **look to see if there was anything concerning on his**

13 **Facebook page or his Twitter feed or Instagram or**

14 **whatever else the kids were using back then?**

15 A. I didn't.

16 **Q. Why not?**

17 A. I don't have -- I mean, I typically don't

18 go looking at kids' Facebook and Instagram and Twitter

19 or whatever else they're using unless there is an

20 indication that there is an issue or somebody is

21 saying that there was something written on one of

22 those -- a post or something written.

23 **Q. So it is fair to say that unless somebody**

24 **tells you there's something you should see on a kid's**

25 **Facebook page or in their homework assignments, you**

121

1 **don't inquire about whether or not there's anything**
 2 **you should be aware of?**
 3 A. I don't know if I did as a general rule.
 4 **Q. Do you now?**
 5 A. No.
 6 **Q. All right. Next item on the list here is**
 7 **law enforcement records, and I think we covered that.**
 8 **Instead of checking law enforcement records, you asked**
 9 **Karl's parents whether he had a criminal history; is**
 10 **that right?**
 11 A. Yeah.
 12 **Q. Okay.**
 13 A. Sorry, I was looking at the -- can I look
 14 at the threat assessment again?
 15 **Q. Yes. The next source of information on**
 16 **the list in the slide from the training that Nate**
 17 **Thompson presented refers to a search of a student, a**
 18 **locker, and a car. Did you or anybody involved with**
 19 **Karl Pierson's threat assessment search Karl, his**
 20 **locker, or his car?**
 21 A. I did not.
 22 **Q. Do you know of anybody who did?**
 23 A. No.
 24 **Q. Did you ask anyone to do that?**
 25 A. We didn't ask for a search. We asked

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1 parents if there was any weapons in the home.
 2 **Q. Okay. Did anybody search Karl's phone,**
 3 **tablet, laptop, daily planner, anything like that?**
 4 A. I did not. I don't know if anybody else
 5 did.
 6 **Q. If they did, they didn't tell you about**
 7 **it?**
 8 A. Right.
 9 **Q. And you didn't ask anyone to search any**
 10 **of those things, did you?**
 11 A. No.
 12 **Q. The next item on the list is a search of**
 13 **the room or home in which Karl resided; right?**
 14 A. Right.
 15 **Q. And, again, you know that there was no**
 16 **search of Karl's room or home done, right?**
 17 A. As far as I know, right.
 18 **Q. And didn't ask for one to be done?**
 19 A. I didn't ask for one, no.
 20 **Q. There was a student interview done,**
 21 **right?**
 22 A. Correct.
 23 **Q. And there was a parent interview done?**
 24 A. Correct.
 25 **Q. The next item on the list says interview**

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1 **with staff, witnesses, and peers, right?**
 2 A. Right.
 3 **Q. And I understand Kevin Kolasa talked to**
 4 **Mark Loptien and Tracy Murphy, but did you interview**
 5 **any staff, witnesses, or peers?**
 6 A. I did not.
 7 **Q. Do you know if Kevin Kolasa interviewed**
 8 **any of Karl's peers as part of this?**
 9 A. I don't know.
 10 **Q. If he did, wouldn't you expect that he**
 11 **would have told you about it?**
 12 A. Yeah.
 13 **Q. And you're not aware of any peer**
 14 **interviews that were done?**
 15 A. Not regarding that incident, no.
 16 **Q. Okay. The next is the interview with the**
 17 **targeted individual. Again, that is something that**
 18 **Kevin Kolasa did, not you?**
 19 A. Right.
 20 **Q. Were you at all concerned about Kevin**
 21 **doing that interview, given that he had no training on**
 22 **threat assessments?**
 23 A. Well, I didn't know he didn't have
 24 training but also --
 25 **Q. Fair point.**

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1 A. -- you know, we all -- people on the team
 2 do different aspects of information gathering. So I
 3 wasn't really concerned at that point, no.
 4 **Q. And that's a good point. What was the**
 5 **division of responsibility between you and Kevin**
 6 **Kolasa as it related to this threat assessment?**
 7 A. I mean, I don't think we sat down and
 8 divvied -- you know, divided things up, but, you know,
 9 in general not one person can do all of the pieces or
 10 we don't -- you know, people would bring all of their
 11 information together. So Kevin had the information
 12 about the threat from Loptien. He had talked with
 13 Kevin -- or, sorry, Tracy. I had looked on the
 14 discipline -- on the logs and --
 15 **Q. Sure.**
 16 A. -- I was assuming that Kevin would have
 17 already had that working knowledge, since he was
 18 involved with the student prior to that time. So that
 19 was my assumption. And he had spoken with James
 20 Englert, and I know that he had informed or had a
 21 discussion with Natalie. And that's what I remember.
 22 **Q. Okay. And going back to Exhibit 4, the**
 23 **last item on this list of sources of information**
 24 **refers to contact with community agencies. To your**
 25 **knowledge, did you or Kevin or anybody from Arapahoe**

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1 **have any contact with any community agencies about**
 2 **Karl Pierson in September of 2013?**
 3 A. I had asked Mom for these forms, and she
 4 had never returned them.
 5 **Q. Okay.**
 6 A. So I don't know if -- I can't -- I don't
 7 know if Kevin had contact. I don't know what other
 8 people -- if other people did.
 9 **Q. Now, when did this document, Exhibit 35,**
 10 **get filled out?**
 11 A. During our meeting.
 12 **Q. Okay.**
 13 A. I don't know if it was completed then and
 14 signed off on right then.
 15 **Q. And that's what I'm trying to get at, was**
 16 **part of it filled out before the meeting, and part of**
 17 **it during?**
 18 A. No, I don't think before.
 19 **Q. Okay.**
 20 A. I think it was all done during.
 21 **Q. When you found out as part of this**
 22 **process that Karl was removed from team leadership on**
 23 **the speech and debate team, did you dig any deeper to**
 24 **find out what had prompted Tracy Murphy to make that**
 25 **decision?**

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1 A. Tracy and I had a conversation about it,
 2 but I didn't -- I don't recall it being anything
 3 really alarming at that point.
 4 **Q. Well, let's break that into a couple of**
 5 **parts. Was that discussion before or after you did**
 6 **this threat assessment?**
 7 A. After.
 8 **Q. So you didn't ask him before the threat**
 9 **assessment why he had been removed from team**
 10 **leadership at the --**
 11 A. I think he had that conversation with --
 12 sorry I cut you off.
 13 **Q. Go ahead.**
 14 A. I think he had had that conversation with
 15 Kevin.
 16 **Q. Okay. Did Kevin share with you what**
 17 **Tracy had told him about the reason for that decision?**
 18 A. I'm sure he did, but I can't remember
 19 exactly -- I can't remember exactly what the reasons
 20 were.
 21 **Q. Let's see.**
 22 A. Sorry, can I take a break?
 23 **Q. Of course.**
 24 **(Recess taken, 1:32 p.m. to 1:49 p.m.)**
 25 **Q. (BY MR. ROCHE) So before we took the**

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1 **break, we were talking about how this threat**
 2 **assessment form was filled out, and it's your**
 3 **recollection that it was all filled out during the**
 4 **meeting, other than some that may have been filled out**
 5 **shortly after?**
 6 A. Correct.
 7 **Q. Okay. Do you recall what would have been**
 8 **filled out after the meeting was completed?**
 9 A. I don't. I may have just been looking it
 10 over and making sure before we wanted to sign it.
 11 **Q. Okay. Now, as you can imagine, I've got**
 12 **a number of questions about this form. One is in**
 13 **Step 1, make sure all students are safe. It's the**
 14 **first page. The box is checked for locate and detain**
 15 **the student under constant adult supervision. Do you**
 16 **see that?**
 17 A. Yes.
 18 **Q. Why is that box checked?**
 19 A. I couldn't answer you. I don't know. I
 20 honestly don't know because everything else that was
 21 checked was like by hand, so . . .
 22 **Q. Right. That was going to be one of the**
 23 **questions I had. Is that just automatically checked**
 24 **by the computer?**
 25 A. It might be. I don't -- I honestly don't

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1 remember.
 2 **Q. Okay.**
 3 A. But I feel like if I checked that, I
 4 would have checked it by hand.
 5 **Q. In the next step in this process it says**
 6 **make immediate notifications, right, on the form?**
 7 A. Yes. Sorry.
 8 **Q. And there are four of those boxes**
 9 **checked. The first one being --**
 10 A. There's three.
 11 **Q. Oh, you're right. I'm sorry. I misread**
 12 **it. The first is school building administrators,**
 13 **review the need for a threat assessment. That's a**
 14 **reference to your discussion with Mr. Kolasa?**
 15 A. Correct.
 16 **Q. Did you speak with any other**
 17 **administrators about Karl Pierson prior to this threat**
 18 **assessment reentry meeting?**
 19 A. Oh, not that I'm aware of, no.
 20 **Q. The box for contacting emergency**
 21 **responders school resource officers or the district**
 22 **security office as needed is also checked. Was that**
 23 **based on Mr. Kolasa's discussion with Deputy Englert?**
 24 A. Correct.
 25 **Q. Was anybody else in law enforcement or**

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1 **district security notified about this threat**
 2 **assessment happening?**
 3 A. Not that I'm aware of.
 4 **Q. Okay. And then the next box related to**
 5 **contacting district administration is not checked,**
 6 **right?**
 7 A. Right.
 8 **Q. And I assume that's because the level of**
 9 **threat was not school district or community-wide?**
 10 A. Correct.
 11 **Q. Okay. And then the last box that's**
 12 **checked is to indicate that Karl's parents were**
 13 **notified prior to conducting the threat assessment,**
 14 **right?**
 15 A. Right.
 16 **Q. Okay. At the bottom of the first page of**
 17 **the threat assessment and action plan is a note about**
 18 **how to review the threat assessment factors, right?**
 19 A. It says it -- right, it's a guide -- or a
 20 guideline or a guide to reviewing that threat
 21 assessment process.
 22 **Q. Right. And it explains that "The purpose**
 23 **of this process is to determine whether a student**
 24 **poses a threat to the safety of others," right?**
 25 A. Correct.

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1 **Q. That was what you understood you were**
 2 **doing?**
 3 A. Correct.
 4 **Q. And the instructions indicate that, among**
 5 **other things, the threat assessment team was to, and**
 6 **this is bolded and underlined, "Provide notes**
 7 **explaining the evidence next to each statement**
 8 **checked." Do you see that?**
 9 A. Yes.
 10 **Q. Okay. And obviously there are a number**
 11 **of things checked here that don't have any notes**
 12 **explaining the evidence associated with them, right?**
 13 A. Right.
 14 **Q. Why is that?**
 15 A. I don't have an explanation. We didn't
 16 write notes. I mean, that was not my practice to
 17 write notes next to every check mark.
 18 **Q. Okay. Well, we've walked through**
 19 **Exhibit 4, which talks about how important it is to**
 20 **document the threat assessment process, right?**
 21 A. Uh-huh.
 22 **Q. And it does say that, doesn't it?**
 23 A. On --
 24 **Q. The Nate Thompson training slides?**
 25 A. Yes.

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1 **Q. And it says in the form itself in bold**
 2 **and underlined that the threat assessment team members**
 3 **are to provide notes explaining the evidence next to**
 4 **each statement that's checked. Do you do that now?**
 5 A. I haven't, no.
 6 **Q. Don't you think that affects negatively**
 7 **the reliability and the accuracy of the threat**
 8 **assessment that you perform?**
 9 A. Not necessarily, no. I mean, I don't
 10 know how I'm supposed to -- you know, with this one
 11 react to discipline calmly. I don't know what notes I
 12 would write next to it as evidence, I mean . . .
 13 **Q. Well, I mean to use your example, one**
 14 **note that could go in that column is, I spoke to his**
 15 **teachers, they all say he reacts to discipline calmly.**
 16 A. Okay.
 17 **Q. Except for Mrs. Smith, who says he threw**
 18 **a fit and, you know, launched his history book at me.**
 19 **I mean, there's any number of things that could go in**
 20 **those notes, but not taking them or making them or**
 21 **explaining the process you went through, you can**
 22 **certainly understand, I would think, that calls into**
 23 **doubt how thorough this threat assessment was. Don't**
 24 **you think?**
 25 A. Okay.

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1 **Q. So let's walk through the threat**
 2 **assessment factors you filled out, and the first one**
 3 **asked was the threat direct or indirect/veiled, right?**
 4 A. Right.
 5 **Q. And, first, can you explain to me what**
 6 **you understand to be the difference between a direct**
 7 **and an indirect or veiled threat?**
 8 A. A direct threat would be a verbal threat,
 9 indirect would be a gesture or -- and I understand
 10 that that's contradictory, and I had explained that
 11 when I first talked about this that that was
 12 admittedly a mistake that I made in that check box.
 13 **Q. And to whom did you explain that?**
 14 A. When I was first interviewed.
 15 **Q. By whom?**
 16 MR. NATHAN: You can say who it was.
 17 A. So it was Darrell.
 18 **Q. (BY MR. ROCHE) Darrell Farrington?**
 19 A. Yeah.
 20 **Q. Okay. I just wanted to make sure it**
 21 **wasn't Darrell Meredith.**
 22 A. No.
 23 **Q. Okay. And did you explain that or have**
 24 **you had any discussions with anybody other than**
 25 **Mr. Farrington about the mistake there?**

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1 A. No.

2 **Q. That would include anybody working at**

3 **LPS, didn't talk to any of them about it?**

4 A. Correct. Nobody else ever asked me about

5 it.

6 **Q. That includes Natalie Pramenko never**

7 **asked you about it?**

8 A. No.

9 **Q. Scott Murphy never asked you about it?**

10 A. No.

11 **Q. Okay. Nobody from the sheriff's office?**

12 A. No.

13 **Q. In the threat factors it also asks was**

14 **the threat verbal, nonverbal, symbolic, hand or body**

15 **gesture, written or via technology. There's several**

16 **different boxes there, right?**

17 A. Correct.

18 **Q. And you marked down that it was a verbal**

19 **threat, which it was, right?**

20 A. Right.

21 **Q. My question is on the written and via**

22 **technology boxes there, and I think I know the answer,**

23 **you didn't look at any of Karl's writings or**

24 **electronics to see if there was any evidence of a**

25 **threat, did you?**

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1 A. No.

2 **Q. And you knew, did you not, in the fall of**

3 **2013 that the faculty and staff and counselors had the**

4 **right under the student handbook to search phones,**

5 **laptops, electronics at school, didn't you?**

6 A. I did not.

7 **Q. I guess, is that the first time you've**

8 **heard that the school has the right to search a**

9 **student's electronics?**

10 A. I knew the school does, but I didn't know

11 every employee of the school was allowed to.

12 **Q. Okay. Fair enough. That's a fair**

13 **distinction. Did you know in the fall of 2013 that**

14 **the school had the right with reasonable suspicion to**

15 **search a student's electronics?**

16 A. Yes.

17 **Q. Okay. And other than it wasn't your**

18 **practice to do so, was there a reason you didn't**

19 **request to search Karl's laptop, phone, iPad, tablet?**

20 A. There wasn't any indication that there

21 were any threats made besides the verbal one.

22 **Q. Okay. But wouldn't you want to look to**

23 **see if there is anything else out there?**

24 A. Yeah, in hindsight, I would do everything

25 in my power to look. If I could have looked back and

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1 looked at everything possible, yes, I would have.

2 **Q. Okay.**

3 A. And I -- yeah.

4 **Q. Now, in the next column -- actually, it's**

5 **a couple of columns down, this document asks has the**

6 **student communicated ideas or intent to attack. Do**

7 **you see that?**

8 A. Yes.

9 **Q. And you've got the box marked no. Help**

10 **me to understand why you marked no.**

11 A. He made the verbal threat, but when we

12 were talking about the threat, there was -- he was

13 saying that there was no intent behind it, that he

14 didn't -- he said it out of anger, that he had no

15 intention of doing that.

16 **Q. Okay. And the next item on the list is**

17 **access to weapons, and you checked none known, right?**

18 A. Right.

19 **Q. And what was the basis for checking that**

20 **box?**

21 A. Conversation with parents.

22 **Q. Okay. What do you ask the parents?**

23 A. If there are any weapons. If there is

24 any access to weapons in the home, if there's any --

25 you know, a lot of times people will say, yeah,

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1 there's knives in the kitchen or -- but we always ask

2 if they have access.

3 **Q. Okay.**

4 A. Most parents will say if they have access

5 to like a hunting gun or if there's things in the

6 home.

7 **Q. Okay. And do you recall -- who did you**

8 **ask? Was it Mr. Pierson or Mrs. Pierson or both?**

9 A. I'm sure I asked both because they were

10 both there.

11 **Q. Okay.**

12 A. I know that he was at both homes.

13 **Q. Do you recall where he spent the majority**

14 **of his time?**

15 A. His mother's house.

16 **Q. Okay. Now, when you were analyzing the**

17 **question about whether or not Karl had the ability to**

18 **carry out a plan to kill Tracy Murphy, you had three**

19 **choices: no ability, possible ability, and reported**

20 **ability and training. Do you see that?**

21 A. Right.

22 **Q. How did you select possible ability?**

23 A. I'm guessing based on his history that

24 there was a history of discipline, but that it's

25 plausible but not realistic in that case.

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1 **Q. Okay. Did you know -- I'll be more**
 2 **direct. Were you aware, as you were filling out the**
 3 **factors about access to weapons and ability to carry**
 4 **out the plan, that Karl had been a Boy Scout and had**
 5 **spent summers gaining marksmanship certificates as**
 6 **part of the Boy Scouts, shooting pistols, rifles,**
 7 **shotguns?**
 8 A. No.
 9 **Q. Would that have been important for you to**
 10 **know?**
 11 A. Yes.
 12 **Q. When you asked about access to weapons,**
 13 **did you ask anything of his parents about whether or**
 14 **not Karl knew how to shoot, liked to shoot, had any**
 15 **training in shooting, anything like that?**
 16 A. I don't recall if I did, but I'm -- I
 17 mean, I usually do.
 18 **Q. Usually you do?**
 19 A. Ask parents -- you know, ask the family
 20 if they've had any experience with weapons or if
 21 they've ever used them.
 22 **Q. Okay. Do you recall what his parents**
 23 **said?**
 24 A. I don't.
 25 **Q. The next item on the list is the motive**

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1 **to threat or harm targeted others. And, again, you've**
 2 **checked possible reasons. And your notes make clear**
 3 **that that's a reference to Karl being demoted from the**
 4 **captain's position on the debate team?**
 5 A. Correct.
 6 **Q. How do you differentiate between a**
 7 **possible motive and a definite motive?**
 8 A. You know, I'm -- possibly if there was a
 9 history of conflict between the two.
 10 **Q. Did you know whether there was a history**
 11 **of conflict between Karl and Tracy Murphy?**
 12 A. I don't think -- I don't believe I was
 13 ever told there was. I don't think there was. To the
 14 best of my knowledge, I don't remember Tracy saying
 15 that there was a history.
 16 **Q. Okay. So you hadn't heard that Karl was**
 17 **unhappy that Mr. Murphy hadn't accompanied him to**
 18 **nationals six months previously, five months**
 19 **previously?**
 20 A. That he was upset with Tracy for not
 21 going to nationals?
 22 **Q. Yes.**
 23 A. No.
 24 **Q. Didn't know that?**
 25 A. (Deponent shook head side to side.)

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1 **Q. Didn't know that Karl was unhappy with**
 2 **Tracy for not giving him the praise that he felt he**
 3 **was due for making nationals?**
 4 A. No.
 5 **Q. Okay. So the only thing you knew about**
 6 **the relationship between Karl Pierson and Tracy Murphy**
 7 **was that Tracy had kicked him off of the captain's**
 8 **seat on the debate team, but you weren't sure why,**
 9 **right?**
 10 A. Right. Well, I know that -- I mean,
 11 there were reasons, yeah. So I don't know -- I can't
 12 remember the specific reasons why.
 13 **Q. Okay. And then in the early warning**
 14 **signs and factors that's on Exhibit 35, there's a**
 15 **number of different factors listed, correct? One of**
 16 **them is violent behavior towards others, and you've**
 17 **checked that Karl had a significant history of such**
 18 **violent behavior, right?**
 19 A. Correct.
 20 **Q. Do you recall what led you to**
 21 **characterize his history of violent behavior as**
 22 **significant?**
 23 A. I think based on Mom's report and then
 24 looking at the discipline log.
 25 **Q. Okay. Now, what violent behavior towards**

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1 **others did Mom report to you?**
 2 A. I don't think she reported specific
 3 incidences, not from home.
 4 **Q. Okay. You'll see in -- I'm sure you have**
 5 **seen that in the margins you've written that "Mom**
 6 **reports 'deep seeded' anger and Karl agrees he's had**
 7 **anger issues for a while," correct?**
 8 A. Correct.
 9 **Q. And was that part of your reasoning in**
 10 **marking that Karl --**
 11 A. Yes.
 12 **Q. -- had a significant history of violent**
 13 **behavior?**
 14 A. Correct.
 15 **Q. What did you do to probe with Mom and**
 16 **with Karl those anger issues?**
 17 A. I don't -- I didn't really probe what was
 18 behind the anger issues. The parents just reported
 19 there was a history, that he had been in therapy.
 20 **Q. Don't you think it would have been**
 21 **important to know why Karl was so angry as part of**
 22 **performing an accurate threat assessment?**
 23 A. I think that would be helpful
 24 information.
 25 **Q. Okay. So why didn't you probe Karl and**

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1 **his parents about those issues?**
 2 A. I mean, I'm -- you know, looking back,
 3 I'm sure we had a conversation about him having anger
 4 issues. I don't know how in depth -- I really don't
 5 know how in depth they were.
 6 **Q. Well, when you heard about these deep**
 7 **seeded anger issues that both Karl and his mom**
 8 **acknowledged existing, did that lead you to conclude**
 9 **that Karl ought to be getting some professional help**
 10 **with those issues?**
 11 A. Well, I knew that he was. I mean,
 12 reportedly that's what Mom had said.
 13 **Q. Okay. And did you think that he needed**
 14 **professional help for those anger issues based on what**
 15 **you heard?**
 16 A. Yeah. I mean, I think it's always
 17 helpful.
 18 **Q. Okay. Can you tell me anything more**
 19 **about what you did to investigate these deep seeded**
 20 **anger issues that both Karl and his mother reported to**
 21 **you?**
 22 A. Nothing at that time. I asked Mom for a
 23 release form to talk to the therapist.
 24 **Q. Right.**
 25 A. So that I could have communication, but I

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1 didn't have -- I don't know what further conversation
 2 I had about specific issues.
 3 **Q. Okay. Did you ask either Karl or his mom**
 4 **how those anger issues manifested themselves in Karl's**
 5 **life?**
 6 A. I'm sure I had a conversation, but I
 7 don't remember.
 8 **Q. Well, did you know as you were filling**
 9 **this document out that just a couple of weeks before**
 10 **threatening to kill Tracy Murphy, Karl had totaled his**
 11 **car leaving work in a rage?**
 12 A. I think Mom had referenced having a car
 13 accident, but I don't think she said that -- I don't
 14 remember her saying that it was because he left in a
 15 rage.
 16 **Q. And did you do any further probing or**
 17 **questioning of Karl or his mom about the car accident?**
 18 A. I don't think so. I don't see it noted
 19 on here.
 20 **Q. Okay. And if you had dug a little**
 21 **deeper, the answers would have been noted somewhere on**
 22 **this form?**
 23 A. I'm assuming so, yes.
 24 **Q. Okay. And the reason I'm asking about**
 25 **that is because -- you're welcome to look along, but**

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1 **in Exhibit 33, which is a document from the sheriff's**
 2 **investigation, Mrs. Pierson reported that Karl totaled**
 3 **his car on August 11 after he left McDonald's, where**
 4 **he worked. She told the police that Karl was very**
 5 **angry over something that happened and totaled his car**
 6 **after running a stop sign and hitting somebody else.**
 7 **So that's the incident that you were referring to,**
 8 **correct?**
 9 A. The incident that you --
 10 **Q. The car accident.**
 11 A. That you were referring to?
 12 **Q. Yes.**
 13 A. Yeah.
 14 **Q. And you didn't know it happened because**
 15 **he was angry, you just knew he had been in a car**
 16 **accident?**
 17 A. Right. That it was stressful because he
 18 had been in a car accident.
 19 **Q. Okay. Would it have been important to**
 20 **you to know that Karl's anger could reach the point**
 21 **where he would run through a stop sign in a rage --**
 22 A. Absolutely.
 23 **Q. -- and wreck his car?**
 24 A. Absolutely.
 25 **Q. Okay. Now, the early warning sign factor**

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1 **that is there for violent/threatening themes conveyed**
 2 **in stories, diary entries, essays, letters, songs,**
 3 **drawings or videos, that's not checked, correct?**
 4 A. Correct.
 5 **Q. And part of why that's not checked is**
 6 **because you didn't look at any of those items, right?**
 7 A. Correct.
 8 **Q. And that's because nobody had told you**
 9 **that there was anything to see in his stories,**
 10 **diaries, essays, letters, et cetera, correct?**
 11 A. Correct.
 12 **Q. And because you didn't talk to any of his**
 13 **teachers about whether there was anything concerning**
 14 **in any of those categories, right?**
 15 A. Correct, they usually -- so I'm not
 16 pointing a finger at the teachers, but usually they
 17 would bring us -- they bring it to us if there was
 18 something concerning, a student's writing or artwork.
 19 **Q. Okay. Well, the teachers weren't told**
 20 **that Karl was going to be the subject of a threat**
 21 **assessment, were they?**
 22 A. Not that I'm aware of.
 23 **Q. And none of the other boxes in the early**
 24 **warning sign factors are checked, are they?**
 25 A. No.

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1 **Q. And that includes the early warning sign**
 2 **factor for a history of perception of being bullied or**
 3 **victimized by others, right?**
 4 A. Right.
 5 **Q. I take it that was another mistake?**
 6 A. I'm assuming so.
 7 **Q. Can you shed any light on why that isn't**
 8 **checked given the fact that Karl said almost those**
 9 **exact words in the behavioral detail report we just**
 10 **looked at?**
 11 A. I mean, my -- honestly, and it's not -- I
 12 don't want it to sound like I'm making excuses for
 13 anyone or anything that we did, but I feel like, yeah,
 14 if I could have gone back, I would have taken all the
 15 time in the world to sit there and make sure I was
 16 doing everything as -- sorry.
 17 **Q. It's okay.**
 18 A. But I feel like we did the best that we
 19 could in the moment, and it's not an excuse, but I
 20 feel like -- yeah, if there were boxes that were
 21 mischecked or not checked, it was my fault for not
 22 doing that, but I guess I just -- I don't really have
 23 an excuse for not having that done. I don't think I
 24 answered your question.
 25 **Q. Okay.**

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1 A. Sorry.
 2 **Q. It's okay. Let's talk about the at-risk**
 3 **factors. You've marked that Karl had a history of**
 4 **school discipline that included the oppositional**
 5 **misconduct category, right?**
 6 A. Right.
 7 **Q. Did not include the -- didn't check the**
 8 **box for suspension, because you didn't know that he**
 9 **had been suspended; is that right?**
 10 A. Correct.
 11 **Q. Okay. A couple of other boxes here I**
 12 **wanted to ask you about. One is violence/abuse is**
 13 **modeled at home or in the community. That one is**
 14 **obviously not checked?**
 15 A. Right.
 16 **Q. My question is, how do you, as a school**
 17 **psychologist, find out whether or not violence is**
 18 **modeled at the home, because the parents certainly**
 19 **aren't going to tell you that. So how do you dig into**
 20 **that issue?**
 21 A. So that -- a lot of times, we look at if
 22 there is a history of domestic violence or abuse at
 23 home or if there is a record of that. Oftentimes we
 24 do know because it's information that's relayed to us
 25 from level to level or --

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1 **Q. So from elementary to middle, middle to**
 2 **high?**
 3 A. Yeah. Often -- yeah, if there's concerns
 4 about a student or usually there's concern about a
 5 student, they'll have that information transition with
 6 the student.
 7 **Q. Okay. Now, the next box is difficulty**
 8 **controlling impulses or emotions. That one is checked**
 9 **as well?**
 10 A. Right.
 11 **Q. What was the basis for checking that?**
 12 **Was it just the fact that there had been a threat?**
 13 A. The threat, the outburst that I noted
 14 above.
 15 **Q. Oh, in Mr. Swomley's class?**
 16 A. Yeah. I'm sure looking at the behavior
 17 reports.
 18 **Q. Okay. Now, you do not have checked the**
 19 **box for significant psychiatric/medical conditions or**
 20 **medication needs, right?**
 21 A. Right.
 22 **Q. I've read in a couple of different**
 23 **places, including in the sheriff's report and some**
 24 **other witness statements, that you've referred to Karl**
 25 **as a narcissist and in some even as the most**

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1 **narcissistic person you had ever met. Do you recall**
 2 **saying those things?**
 3 A. I don't think I've ever said he's the
 4 most narcissistic -- not that I recall ever saying
 5 that he was the most narcissistic person I've ever
 6 met. I don't recall ever saying that. I remember
 7 saying that he was narcissistic.
 8 **Q. Okay. And would that narcissism be**
 9 **something that would normally cause you to indicate**
 10 **that he had a significant psychiatric issue?**
 11 A. Not necessarily. I mean, I think that
 12 there's a lot of kids who are narcissistic at that age
 13 because I think that's the nature of being a teenager
 14 as well. But it could definitely be a factor.
 15 **Q. Okay.**
 16 A. Sorry.
 17 **Q. It's okay. Now, you also marked that**
 18 **Karl had angry reactions that were extreme or**
 19 **disproportionate to the situation, right?**
 20 A. Right.
 21 **Q. Is that a reference back to what happened**
 22 **in the math class and to the threat to kill Mr. Murphy**
 23 **because he was demoted on the debate team?**
 24 A. Yes.
 25 **Q. Did anything else factor into that?**

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1 A. I'm guessing the behavior logs, but I
2 didn't note that on here.

3 **Q. Now, you've also noted that staff is**
4 **fearful of the student. Obviously Mr. Murphy's name**
5 **is written next to it. Had you talked to any other**
6 **staff to find out what their perceptions were of Karl**
7 **Pierson?**

8 A. Not before this assessment, no.

9 **Q. Now, you did not note that Karl had a**
10 **sensitivity to feedback or criticism, right?**

11 A. Right.

12 **Q. And given the description of his reaction**
13 **to what happened in the math class, it seems like that**
14 **box probably should have been checked as well; don't**
15 **you think?**

16 A. Sure. Yeah.

17 **Q. Sorry, I missed one. There's also a box**
18 **for whether or not the student externalizes blame.**
19 **What did you know about that as it related to Karl**
20 **Pierson?**

21 A. I don't know. I don't know what you're
22 referring to, honestly.

23 **Q. Okay.**

24 A. Do you have an example or -- I don't
25 know.

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1 **Q. Well, with respect to being kicked off**
2 **the debate team, there were a couple of things that**
3 **led up to that, and I'll ask if these refresh your**
4 **recollection. One was he no-showed for back to school**
5 **night where he was supposed to distribute water to the**
6 **folks who showed up. Did you know about that?**

7 A. No.

8 **Q. And then there was a weird incident where**
9 **he stood up in a debate tournament and announced that**
10 **his penis had fallen off. Had you heard about that?**

11 A. No. No.

12 **Q. And he didn't feel like he should be**
13 **punished for either of those incidents.**

14 A. I didn't know that because I wasn't aware
15 of those situations either, and I think the water, as
16 far as I knew, that was all volunteer stuff. I don't
17 know.

18 **Q. Okay. Now, in the list of at-risk**
19 **factors, another item is the student tends to hold on**
20 **to resentments or harbors a grudge. Do you see that?**

21 A. Yeah.

22 **Q. Did you do anything to find out whether**
23 **or not Karl was the kind of kid who held on to**
24 **resentments or harbor ed grudges?**

25 A. Besides talking with the family, no.

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1 **Q. Okay. So help me understand how the**
2 **discussions occurred during this meeting. Karl was**
3 **there, right?**

4 A. Right.

5 **Q. His parents were both there?**

6 A. Right.

7 **Q. And you and Kevin were there?**

8 A. Right.

9 **Q. And this meeting happened in the**
10 **counseling office?**

11 A. Kevin's office.

12 **Q. Kevin's office. How long did it last?**

13 A. Maybe an hour.

14 **Q. Okay. And was there somebody who sort of**
15 **ran the meeting?**

16 A. I mean, I suppose I was because I was
17 asking him questions off of this form.

18 **Q. Okay. And that's kind of what I figured.**
19 **That's what I wanted to get at. Did you walk them**
20 **through, that is Karl and his parents -- did they have**
21 **a copy of this form in front of them?**

22 A. No.

23 **Q. So you had a copy in front of you, right?**

24 A. Right.

25 **Q. And you were walking through all of these**

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1 **factors saying, for instance, Does Karl have access to**
2 **weapons? And then the next item --**

3 A. So I --

4 **Q. -- does Karl have an ability to carry out**
5 **his plan or was he serious about this?**

6 A. So, no, I didn't go through each check
7 box, and in hindsight, I would have.

8 **Q. So tell me how that happened. How is**
9 **this -- how did this conversation occur? What did you**
10 **say? What did they say?**

11 A. I mean, some of it's in natural
12 conversation you have, so you get information based on
13 -- I mean, it's, you know, kind of a flowing
14 conversation. So you get a lot of information that
15 way.

16 **Q. Right.**

17 A. And some of them are more direct
18 questions like, Does he having access to weapons? So
19 I feel like it's -- you know, if there's parts missing
20 or from -- when you have conversation, then we go back
21 and look and see what else -- what other questions we
22 could ask.

23 **Q. Okay. And did you ask anything about**
24 **whether or not Karl was the kind of kid who held on to**
25 **resentments or harbored a grudge?**

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1 A. I don't remember.
 2 **Q. Okay.**
 3 A. I wish I did. I wish I went back through
 4 every check box on here, but, to be honest, I don't --
 5 I mean, I don't know -- I think everyone differs in
 6 how they do it, the process, and so I don't know -- I
 7 have -- when I've conducted threat assessments with
 8 other people, I haven't had them go through every
 9 check box either. Although, the last school I was at,
 10 the counselors were really good about going through
 11 each check box or each section.
 12 **Q. Okay.**
 13 A. And I don't know -- I feel like some of
 14 that is also -- in the last couple of years, I think
 15 people have become a little bit more thorough.
 16 **Q. Okay. The next item on the list of**
 17 **at-risk factors is had the student recently**
 18 **experienced emotional trauma, rejection, humiliation,**
 19 **loss of a family member or peer, victimization by**
 20 **peers, or severe disciplinary action, and none of**
 21 **those are checked.**
 22 A. We always ask about -- or I always ask
 23 about if there's any incidences or if there's been any
 24 kind of events outside of school or anything that's
 25 significant that has happened in their lives. That

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1 may explain their -- you know, their outburst or what
 2 -- you know, that might help give some explanation or
 3 insight into their behaviors.
 4 **Q. Okay. And you didn't get an answer from**
 5 **Karl or his parents about -- that provided any insight**
 6 **into why he was so angry or why he was having this**
 7 **history of outbursts that he had been having, right?**
 8 A. When I did ask Mom, she just said that he
 9 had been angry since childhood.
 10 **Q. How did that affect your evaluation of**
 11 **Karl in this threat assessment, that he had been angry**
 12 **since childhood?**
 13 A. I mean, it's always a factor, but when we
 14 look at -- we're looking in the moment. I mean, we're
 15 taking into account the history, but we're also
 16 looking at, is this person a threat right now, and is
 17 he in imminent danger now. And so it's always a
 18 factor.
 19 **Q. Okay. And having a long-standing history**
 20 **of anger would increase generally the concern level**
 21 **that you would have about a student, wouldn't it?**
 22 A. It would, but I think also because there
 23 was some protective factors because he was in therapy,
 24 because he had -- reportedly the parents were
 25 supportive of him, Mom was. There's some of those

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1 factors also.
 2 **Q. Sure.**
 3 A. I mean, he was pretty engaged in the
 4 school.
 5 **Q. Right. And we're going to get to those**
 6 **as well. I'm just trying to figure out which factors**
 7 **were increasing your level of concern and which ones**
 8 **were decreasing. And the fact that he had a long**
 9 **history of anger was one that increased your level of**
 10 **concern, right?**
 11 A. Right.
 12 **Q. And what about in the margins here?**
 13 **You've written that Karl understands his reaction was**
 14 **inappropriate, but does not seem to be remorseful or**
 15 **understanding of Tracy Murphy's feelings of being**
 16 **threatened. Did his lack of remorse and lack of**
 17 **empathy increase your concerns?**
 18 A. It did.
 19 **Q. Why?**
 20 A. Because I was concerned about the fact
 21 that he -- I mean, it was concerning that he didn't
 22 have that -- he didn't feel bad about Tracy feeling
 23 threatened. I don't know how else to explain it.
 24 **Q. Well, I'm certainly not a psychologist,**
 25 **and don't pretend to be. But I have read that lack of**

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1 **remorse and lack of empathy are two of the hallmarks**
 2 **of a sociopath. Am I right about that?**
 3 A. I'm sure they're characteristics of that.
 4 I don't know if it's hallmarks.
 5 **Q. Okay. Characteristics.**
 6 A. Okay.
 7 **Q. Did you ever have the thought that, Okay,**
 8 **this kid shows poor impulse control, no remorse, and**
 9 **no empathy, those are characteristics of a sociopath?**
 10 **Did you think about that as you went through this**
 11 **process?**
 12 A. I'm sure I did.
 13 **Q. Okay. I take it that increased your**
 14 **concern level as well?**
 15 A. Yep.
 16 **Q. And --**
 17 A. And I think I was missing pieces of
 18 information as well.
 19 **Q. Agreed.**
 20 A. So, yeah, if I could look back and see
 21 all of those pieces, absolutely, my level of concern
 22 would be different, and we would probably be having a
 23 different conversation.
 24 **Q. And one of the things that change is,**
 25 **based on the level of concern that you reach at the**

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1 **end of this process, how much monitoring or**
 2 **supervision is provided to the student who is the**
 3 **subject of the threat assessment, correct?**
 4 A. Right.
 5 **Q. Okay. Now, you had mentioned the**
 6 **protective factors, and that's at the bottom of the**
 7 **page we're looking at on the threat assessment, right?**
 8 A. Right.
 9 **Q. And -- well, first off, will you explain**
 10 **what protective factors are?**
 11 A. They're things that help children with
 12 their resiliency and with their ability to cope with
 13 stressful situations and things that help protect
 14 them.
 15 **Q. Protect them and protect other people**
 16 **from them, right?**
 17 A. Right.
 18 **Q. And the first item listed in protective**
 19 **factors asks what does a student do when he is in**
 20 **distress, right?**
 21 A. Right.
 22 **Q. There are four different potential**
 23 **responses, three of them are bad, and one of them is**
 24 **good, right?**
 25 A. Right.

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1 **Q. And all three of the negative factors are**
 2 **checked, but not the single positive factor, right?**
 3 A. Right.
 4 **Q. So that too, I assume, increased your**
 5 **level of concern?**
 6 A. Right.
 7 **Q. And then you talk about adult**
 8 **supervision, and you've marked that his parents are**
 9 **sometimes monitoring him?**
 10 A. Right, because they're working. They're
 11 not home all the time.
 12 **Q. What kind of questions do you ask about**
 13 **what parents are doing to monitor a student like Karl?**
 14 A. Just when they're interacting with him,
 15 what kind of time they spend with him. But I knew
 16 that Mom had him in therapy.
 17 **Q. Well, do you ask, for instance, Do you**
 18 **look at their Facebook page? Do you have access to**
 19 **their e-mail? Can you see their text messages?**
 20 **Anything like that?**
 21 A. Sometimes -- well, not in this case I
 22 didn't, but I do in other cases.
 23 **Q. Is there a reason that you didn't ask**
 24 **about his electronics, his phone, his media, his**
 25 **laptop, whether the parents could see the text**

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1 **messages?**
 2 A. No. I wasn't -- I don't have a reason.
 3 I should have.
 4 **Q. Okay. Is it something you do now?**
 5 A. It's conversations I have with parents
 6 all the time. I don't know if I have with every
 7 threat assessment.
 8 **Q. Okay. Another question you ask or that**
 9 **is listed on the threat assessment form is does the**
 10 **student have supportive relationships, right? And**
 11 **that's empty. There's nothing marked. Can you tell**
 12 **me why that is?**
 13 A. No. It might just have been because I
 14 didn't ask that question. I mean, I don't have a
 15 reason.
 16 **Q. Is that a standard question that you**
 17 **normally ask?**
 18 A. I mean, it usually comes out in the
 19 conversation. So typically, yes -- I mean, if it
 20 hasn't come up.
 21 **Q. And oftentimes that's a coach or someone**
 22 **like that, right, that's who --**
 23 A. A coach, a parent.
 24 **Q. -- would go in that category? Right.**
 25 A. Administrator or counselor.

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1 **Q. And, in fact, the one coach Karl had was**
 2 **Tracy Murphy, who had just frankly rejected him by**
 3 **demoting him from the captain seat, right?**
 4 A. Yeah, but -- yeah.
 5 **Q. How did you select -- in the next item in**
 6 **the protective factors, you list level of self-control**
 7 **is okay with supports. How did you come to that**
 8 **conclusion?**
 9 A. I'm assuming it was based on conversation
 10 with parents and when -- with Kevin when discipline
 11 had been put in place or conversations I would have
 12 had with the student.
 13 **Q. Okay.**
 14 A. But I don't know.
 15 **Q. Do you recall anything that Karl's**
 16 **parents said about his self-control?**
 17 A. Not besides what was listed and what
 18 we've talked about in here.
 19 **Q. Okay. And you mentioned a few times now**
 20 **that you knew Karl was in therapy, right?**
 21 A. Right.
 22 **Q. And I think I'm reading these notes**
 23 **correctly, but down in the lower right it says**
 24 **psychiatrist first appointment 9/6. Am I reading that**
 25 **right?**

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1 MR. EVERALL: Psychologist.
 2 A. Psychologist.
 3 **Q. (BY MR. ROCHE) Oh, psychologist. Do you**
 4 **see the note I'm referring to?**
 5 A. Yeah. I think that was after her -- she
 6 had brought him to -- she had brought him to get
 7 evaluated after he -- sorry.
 8 **Q. It's okay.**
 9 A. When he -- when Mom had decided to keep
 10 him home for those three days after he threatened
 11 Tracy, and then they made the appointment to see that
 12 psychologist.
 13 **Q. Right. Am I reading that correctly that**
 14 **the first appointment that you were aware of came**
 15 **after the threat?**
 16 A. With that psychologist. Mom had reported
 17 that he had seen therapists in the past, so I don't
 18 know -- I don't have a chronology or history of
 19 exactly when and who. So underneath it says previous
 20 measure that have been effective, and was reported by
 21 Mom that therapy had been.
 22 **Q. Okay. But you didn't -- I guess what**
 23 **follow-up did you ask of --**
 24 A. I asked --
 25 **Q. -- Mrs. Pierson about that?**

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1 A. I asked Mom for the release forms to talk
 2 with the psychologist and family practitioners, and
 3 she never completed them and returned them.
 4 **Q. Okay. Did she tell you when that therapy**
 5 **had occurred? Are we talking back in second grade or**
 6 **two years ago?**
 7 A. I honestly can't remember. It sounded
 8 like -- I mean, as far as I can remember, it was
 9 throughout, you know, his childhood and adolescence.
 10 But I honestly can't remember.
 11 **Q. And then the last line of handwritten**
 12 **notes there talks about -- it says talked to something**
 13 **at AHS?**
 14 A. Talk with assistant principal.
 15 **Q. Okay. And what does that refer to?**
 16 A. That Kevin had had conversations or
 17 intervention -- I don't know if it was interventions,
 18 but conversations with Karl in the past, so . . .
 19 **Q. Okay. And you've mentioned a couple of**
 20 **times the e-mail exchange you had with Barbara Pierson**
 21 **after this threat assessment was done. And you had**
 22 **asked her to sign some releases?**
 23 A. That I asked her to do at this meeting.
 24 I gave her the release forms to complete and the --
 25 yeah, there was one e-mail exchange, I think, after.

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1 **Q. Right. It looked like there was one**
 2 **e-mail exchange between you and Barbara Pierson where**
 3 **essentially she asked, Can we get Karl on an IEP?**
 4 A. Right.
 5 **Q. Independent education plan.**
 6 A. Can I start an IEP process.
 7 **Q. Then you wrote her back and said, Yes,**
 8 **but he needs a diagnosis basically, right?**
 9 A. No, not that I recall, but if I can see
 10 the document.
 11 **Q. Yeah, I'll have to dig those out. I**
 12 **think I have them here.**
 13 A. I don't -- I mean, I don't think I've
 14 ever told a parent that you need a diagnosis, because
 15 that's not the case.
 16 **Q. But that e-mail exchange was the only**
 17 **follow-up communication that you had with Barbara**
 18 **Pierson after this threat assessment, correct?**
 19 A. Right.
 20 **Q. So she sent you --**
 21 A. I think so.
 22 **Q. -- one e-mail, and you sent her one?**
 23 A. I think so.
 24 **Q. And you didn't talk to Barbara Pierson at**
 25 **any time after this meeting on September 9?**

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1 A. No. There was a follow-up meeting, and
 2 that I was not involved in.
 3 **Q. Right.**
 4 A. Right.
 5 **Q. And the same with Mr. Pierson, Karl's**
 6 **dad, you didn't have any communications with**
 7 **Mr. Pierson after September 9, did you?**
 8 A. No.
 9 **Q. Now, going to the next page of the threat**
 10 **assessment document, it starts with step 4. It says**
 11 **you reviewed the findings with the building team to**
 12 **determine the level of concern, right?**
 13 A. Right.
 14 **Q. And the point of that review is to**
 15 **determine or ask the question to what extent does a**
 16 **student pose a threat to school or student safety,**
 17 **right?**
 18 A. Right.
 19 **Q. Tell me about the process that you went**
 20 **through to convene the threat assessment team to**
 21 **answer that question.**
 22 A. I don't know if there was a specific
 23 process. I mean, we had a conversation about the
 24 factors, how we felt, you know, based on the
 25 information that we got. You know, and it's based on

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1 the definitions that are underneath.
 2 **Q. Right.**
 3 A. And that's what guides us.
 4 **Q. So here is my -- one of my questions.**
 5 **Did you and Kevin Kolasa or you and Kevin and others**
 6 **get together after Karl and his parents left the room**
 7 **to talk about what level of concern applied to Karl**
 8 **Pierson in this situation?**
 9 A. I think Kevin and I did, and I don't know
 10 -- I can't remember if we consulted with James. I
 11 know that Kevin had a conversation with Natalie, but I
 12 don't know the chronology of -- I don't know. I can't
 13 speak for him.
 14 **Q. So when the Piersons left Kevin's office**
 15 **after this meeting, that box wasn't checked, right?**
 16 A. Yeah, I don't -- not that I'm aware of.
 17 **Q. So how long after the Piersons -- after**
 18 **your meeting with the Piersons concluded did you and**
 19 **Kevin --**
 20 A. I'm sure --
 21 **Q. -- discuss which of these three boxes to**
 22 **check?**
 23 A. Oh, I'm sure that -- I mean, I'm not a
 24 hundred percent sure, but I'm pretty sure that we
 25 probably talked about it after they left. So

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1 undetermined, but, again, I don't know.
 2 **Q. Do you recall anything about your**
 3 **conversations with Kevin Kolasa after the meeting with**
 4 **the Piersons on September 9?**
 5 A. Not specifics, no.
 6 **Q. What about even generally?**
 7 A. I mean, I think we had -- I'm sure we had
 8 a conversation about where we thought his level of
 9 concern was, but, I mean, besides having this
 10 information to guide us, I don't know if we had other
 11 conversations.
 12 **Q. And do you recall, was there any question**
 13 **in your mind or in Kevin Kolasa's mind about how to**
 14 **characterize the threat level for Karl Pierson?**
 15 A. I don't know what -- I mean, I -- so
 16 based on the information I had, no, I felt like he was
 17 -- I would -- I felt like he was a low level. Again,
 18 we've talked about if I had other pieces of
 19 information, my determination probably would have been
 20 different. But I don't know -- I mean, you know, we
 21 both signed it, so I'm guessing that we didn't have a
 22 disagreement about the level.
 23 **Q. Okay. And part of why I'm asking that is**
 24 **in the instructions for completing step 4 it says, "If**
 25 **you have difficulty determining the level of concern,**

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1 **please consult with Nate Thompson," and then it gives**
 2 **his phone number, right?**
 3 A. Right.
 4 **Q. Did you do that?**
 5 A. No, because I'm assuming that we didn't
 6 -- again, were on -- had a consensus about it or felt
 7 the same way.
 8 **Q. Okay. But you can't remember or can't**
 9 **share with me anything about the substance of the**
 10 **conversations that you and Kevin Kolasa had about how**
 11 **to characterize the threat level that Karl Pierson**
 12 **posed?**
 13 A. I'm not withholding anything. I mean --
 14 **Q. I'm not meaning to imply that you are.**
 15 A. I honestly can't remember that specific
 16 -- I can't remember specifics about our conversation.
 17 I can't even really remember -- I'm assuming we had it
 18 in his office, but I honestly can't remember.
 19 **Q. And you've mentioned that you -- if you**
 20 **had had certain additional information your**
 21 **characterization of what level risk Karl posed would**
 22 **have been different, right?**
 23 MR. NATHAN: Object to form. You may
 24 answer.
 25 A. Yeah, I think that -- I think if we -- I

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1 mean, honestly, if we had -- I think that if we had
 2 more staff at the time -- you know, I feel like if we
 3 had -- I think we were spread thin, and it's not an
 4 excuse, but I think we, again, did the best with the
 5 information that we had or the time we had to gather
 6 it in.
 7 **Q. (BY MR. ROCHE) Well, what information**
 8 **that you now know would have changed your**
 9 **characterization of Karl Pierson in this threat**
 10 **assessment?**
 11 MR. NATHAN: Object to form. You may
 12 answer.
 13 A. I would probably have to go back and look
 14 at the examples that you gave me, to be honest. I
 15 mean, all that's going through my head right now is --
 16 is nothing. I'm having trouble recalling. I know
 17 you've talked about him being a Boy Scout and having
 18 marksmanship experience, the car accident, leaving in
 19 a rage. I don't -- I don't know what else right off
 20 the top of my head.
 21 **Q. Okay. And according to the form, a**
 22 **threat should be characterized as a medium level of**
 23 **concern if you believe it could be carried out,**
 24 **although it may not appear entirely realistic and**
 25 **present, right?**

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1 A. Right.

2 **Q. And that's not how you felt about what**

3 **Karl Pierson had done?**

4 A. Correct.

5 **Q. And a threat should also be characterized**

6 **as a medium level of concern if it is somewhat**

7 **plausible and concrete, correct?**

8 A. Correct.

9 **Q. What would make a threat somewhat**

10 **plausible and concrete?**

11 MR. NATHAN: Object to the form. Go

12 ahead and answer.

13 A. If there is a plan or an intent to --

14 intent. Depending on the plan, if they have access to

15 that weapon or those weapons.

16 **Q. (BY MR. ROCHE) Okay. Would the**

17 **existence of a motive on the part of the student**

18 **affect whether or not you considered a threat to be**

19 **somewhat plausible and concrete?**

20 MR. NATHAN: Object to form. You may

21 answer.

22 A. Yeah, that would factor in.

23 **Q. (BY MR. ROCHE) And also refers to a**

24 **medium-level threat as one where the person performing**

25 **the threat assessment has moderate or lingering**

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1 **concerns about the student's potential to act**

2 **violently. Do you see that at the very end of the**

3 **medium description?**

4 A. Just moderate or lingering concerns is

5 that what you're --

6 **Q. Yes. It says for a medium-level concern,**

7 **that would include situations where the person**

8 **performing the threat assessment has moderate or**

9 **lingering concerns about the student's potential to**

10 **act violently, right?**

11 A. Right.

12 **Q. Did you not have any moderate or**

13 **lingering concerns about Karl Pierson's potential to**

14 **act violently given the significant history that you**

15 **noted?**

16 A. I know that there was a history of --

17 from 2003 of acting out towards other kids, and I know

18 that there was verbal. But I didn't have information

19 available to me, other information that I felt like

20 post 2003 that would indicate that he would act

21 violently towards another person.

22 **Q. Okay. And did you go back to -- as part**

23 **of figuring out what level of threat Karl posed and**

24 **try to answer for yourself the early warning signs**

25 **questions or the imminent warning signs questions laid**

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1 **out in the threat assessment training that Nate**

2 **Thompson had provided?**

3 A. Did I reference that?

4 **Q. Yes.**

5 A. No.

6 **Q. Did you go back even in your own head and**

7 **try to answer the question, Did Karl or his behavior**

8 **raise any of the red flags listed in the early warning**

9 **signs that you were aware of?**

10 A. I think I always do.

11 **Q. Okay. And one of the consequences of**

12 **characterizing a student as either a low, medium, or**

13 **high level of concern is how much follow-up or**

14 **monitoring occurs, right?**

15 A. Right.

16 **Q. And in this case -- strike that.**

17 **So for a medium-level threat, the**

18 **follow-up and monitoring is closer and more thorough,**

19 **right, than a low level?**

20 A. Yes.

21 **Q. Okay.**

22 A. I think when I've done mine, most of mine

23 have been low level. So I'm not -- I don't know if I

24 can -- I mean, I'm sure that answer is yes, but I

25 don't know which ones I've done with a medium or a

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1 moderate, sorry.

2 **Q. Okay. And is there a reason that you**

3 **characterize most of your threat assessments as low**

4 **level?**

5 A. Just based on the information that I

6 received or gathered during the process.

7 **Q. Okay.**

8 MR. NATHAN: Need a break?

9 THE DEPONENT: Yes.

10 MR. ROCHE: That's fine. Sure.

11 (Recess taken, 2:58 p.m. to 3:08 p.m.)

12 **Q. (BY MR. ROCHE) As we were walking**

13 **through all of the different early warning signs and**

14 **at-risk factors, a number of times you mentioned the**

15 **fact that there was information that you didn't know**

16 **that might have changed your ultimate conclusions in**

17 **this threat assessment, correct?**

18 A. Right.

19 **Q. And from what you said to prepare for**

20 **this threat assessment, you talked to Kevin Kolasa,**

21 **you looked at Karl's grades, you looked at his**

22 **behavioral detail report, and you looked at his**

23 **contact log and that was it, right?**

24 A. Sorry, can you just repeat --

25 **Q. That's okay. Sure. You also said that**

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1 in preparing for this threat assessment, you spoke
 2 with Kevin Kolasa, you looked at Karl's grades, you
 3 looked at his behavior detail log, and you looked at
 4 the contact log, and that was everything, right?
 5 A. Right.
 6 Q. Okay. Well, here's what I want to know,
 7 and I've got it open. This is Exhibit 38. And this
 8 is the threat assessment in school's document that we
 9 looked at earlier, and I think you said that this is
 10 one of the documents that you actually read?
 11 A. I don't know if I read it in its entirety
 12 or if I -- you know, but I'm sure I looked at it.
 13 Q. Okay. And this document lays out a
 14 number of principles that it says are essential to
 15 performing a successful threat assessment, and one of
 16 them is the one that I've highlighted there for you or
 17 opened the page to. And that is the people
 18 performing --
 19 A. I don't know where that is.
 20 Q. Oh, sure. Over on the right side it says
 21 principle No. 3, right? Do you see that?
 22 A. Yes.
 23 Q. And it says, "An investigative,
 24 skeptical, inquisitive mindset is critical to
 25 successful threat assessment." Do you see that?

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1 A. Yes.
 2 Q. Do you agree with that?
 3 A. Yes.
 4 Q. Do you believe that you and Mr. Kolasa
 5 applied an investigative, skeptical, and inquisitive
 6 mindset to the threat assessment that you performed on
 7 Karl Pierson?
 8 A. To the best of our abilities, yes, and at
 9 that time, yeah.
 10 Q. Okay. Let's talk -- we'll go back to the
 11 threat assessment document itself. And we were
 12 talking about the fact that differing levels of
 13 threats result in differing levels of supervision or
 14 follow-up; right?
 15 A. Right.
 16 Q. And in Karl Pierson's case, the action
 17 plan is laid out on this document, correct?
 18 A. Correct.
 19 Q. And there was no medical care called for,
 20 right?
 21 A. Right.
 22 Q. The box for police responds is checked,
 23 but it also says no action taken, right?
 24 A. Right.
 25 Q. The box saying intended victim was warned

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1 and/or parents or guardians is also checked, right?
 2 A. Right.
 3 Q. That relates to the fact that Kevin
 4 Kolasa spoke to Tracy Murphy, right?
 5 A. Right.
 6 Q. No suicide risk screening performed?
 7 A. Right.
 8 Q. No mental health evaluation performed,
 9 right?
 10 A. Right.
 11 Q. And then there's additional measures to
 12 ensure safety. That box is checked?
 13 A. Right.
 14 Q. And it says one type per week psych
 15 office or psych appointment?
 16 A. Right.
 17 Q. Is that a reference to --
 18 A. Not to me.
 19 Q. -- you?
 20 A. To outside therapy.
 21 Q. Okay. And what did you or anyone at
 22 Arapahoe do to verify that Karl was actually going to
 23 a weekly psych appointment?
 24 A. I didn't do anything to verify that.
 25 Q. Okay.

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1 A. And we recommend or make suggestions a
 2 lot of times to outside therapists, but we can't
 3 enforce at the school that parents take their children
 4 -- we can't -- you know, we can make recommendations
 5 but -- so, yeah, I mean, I didn't -- I guess to answer
 6 your question, I didn't do anything further with that.
 7 Q. Okay. Why not?
 8 A. I don't have an answer.
 9 Q. Wouldn't it be important to you to know
 10 whether a student who had threatened to kill a faculty
 11 member was getting any ongoing psychological help?
 12 A. It would be important and I -- but I also
 13 think that I didn't have the same -- you know, I had
 14 the low level of concern. So I think if it was a
 15 higher level of concern, I might have had more
 16 concerns about him following through with therapy.
 17 Q. Well, this was a measure that you thought
 18 was appropriate to ensure safety, correct, that's why
 19 you checked the box, right?
 20 A. Right.
 21 Q. And that was not just Karl's safety but
 22 -- it was to ensure Karl's safety, right?
 23 A. Right.
 24 Q. And it was also to ensure the safety of
 25 Tracy Murphy, right?

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1 A. Right.
 2 **Q. And everybody else in that school,**
 3 **including Claire Davis, right?**
 4 A. Right.
 5 **Q. So is there a reason that you didn't**
 6 **follow up with Mrs. Pierson and say, Once a week, send**
 7 **me an e-mail that says Karl went to therapy or**
 8 **anything like that to verify he was actually doing**
 9 **what you recommended?**
 10 A. No. I mean, the only thing that I --
 11 what I go back to is that I was the one person in a
 12 school of 2100, and it's not an excuse, but I feel
 13 like I didn't have -- I didn't have consistent
 14 follow-up then.
 15 **Q. Okay. Do you now?**
 16 A. I do. Yeah, at the school I'm at, we
 17 have a really strong team process and follow-up
 18 process.
 19 **Q. And those were all -- what we just**
 20 **discussed, those were all of the safety measures that**
 21 **were part of the action plan that Arapahoe High School**
 22 **put in place for Karl Pierson after he threatened to**
 23 **kill Tracy Murphy, right?**
 24 A. Right.
 25 **Q. And then when it comes to disciplining**

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1 **and monitoring, that's the next section of the threat**
 2 **assessment form, right?**
 3 A. Right.
 4 **Q. And Karl was not suspended for**
 5 **threatening to kill Mr. Murphy, right?**
 6 A. Right.
 7 **Q. And in the box marked disciplinary action**
 8 **taken, there's a reference to a reentry meeting.**
 9 **That's the meeting --**
 10 A. Right.
 11 **Q. -- where this document got filled out,**
 12 **right?**
 13 A. Right.
 14 **Q. Okay. There were no daily or weekly**
 15 **check-ins?**
 16 A. Correct.
 17 **Q. And that's something that was sometimes**
 18 **done with threat assessments, right?**
 19 A. I think, depending on the level, yes.
 20 **Q. Was there a reason why Karl wasn't**
 21 **subjected to a daily or weekly check-in with someone?**
 22 A. I'm assuming because it was a low level
 23 of concern.
 24 **Q. Okay. And Karl was also not required to**
 25 **check in and out his belongings, backpack, coat,**

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1 **et cetera, with anybody at the school?**
 2 A. Correct.
 3 **Q. And, again, that's because you and**
 4 **Mr. Kolasa concluded that he was a low-level threat?**
 5 A. Correct.
 6 **Q. There's no contact -- contract in place**
 7 **with Karl Pierson and anybody else, right?**
 8 A. Not that I was aware of.
 9 **Q. Okay. Well, you would have been the**
 10 **person -- you and Mr. Kolasa would have been the ones**
 11 **to put that in place, right?**
 12 A. You mean during this process?
 13 **Q. Yes.**
 14 A. Oh, I didn't realize you were looking --
 15 yeah.
 16 **Q. And a little further down it talks about**
 17 **a follow-up intervention contact by support staff and**
 18 **the box psychologist is checked?**
 19 A. Uh-huh.
 20 **Q. Is that a reference to you?**
 21 A. Right. I think that was in reference to
 22 that follow-up meeting.
 23 **Q. Okay. And that's the meeting that's**
 24 **described in --**
 25 A. It will meet in two weeks.

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1 **Q. -- your handwriting?**
 2 A. Right.
 3 **Q. And those are all of the discipline and**
 4 **monitoring steps that were put in place by you and**
 5 **Mr. Kolasa, right?**
 6 A. Right.
 7 **Q. And we're obviously going to come back to**
 8 **the meeting. Now, let's talk about the notifications,**
 9 **because you and Mr. Kolasa characterized Karl as a**
 10 **low-level threat, LPS security wasn't notified of this**
 11 **threat assessment?**
 12 A. Right.
 13 **Q. No staff and teachers were alerted?**
 14 A. Right.
 15 **Q. The box where building administration has**
 16 **discussed need to know issue of informing the**
 17 **community is checked, right?**
 18 A. Right.
 19 **Q. What can you tell me about that**
 20 **discussion?**
 21 A. Kevin had a discussion with Natalie on
 22 that date.
 23 **Q. Okay. And that was a discussion about**
 24 **informing the community of the threat, right?**
 25 A. I'm assuming so, yes.

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1 **Q. Did Kevin tell you about that**
 2 **conversation you had with Ms. Pramenko?**
 3 A. Just that he had a conversation with
 4 Natalie.
 5 **Q. Okay. And certainly the community wasn't**
 6 **informed of this threat assessment at the time it**
 7 **occurred, was it?**
 8 A. No.
 9 **Q. The community meaning -- well, you tell**
 10 **me. What does informing a community mean to you? Is**
 11 **that the kids, the parents?**
 12 A. I would think it means the school
 13 community or -- but I guess it would be on a -- I'm
 14 assuming a case-by-case basis, depending on who the
 15 threat was made towards.
 16 **Q. But the short answer is, nobody was**
 17 **notified of this threat assessment other than Natalie**
 18 **Pramenko, right?**
 19 A. And the counselor.
 20 **Q. And that was Kelly Talen or Astrid?**
 21 A. No, it was Astrid.
 22 **Q. Okay. Not even Karl's teachers were**
 23 **notified?**
 24 A. I don't believe so.
 25 **Q. Okay. And then there is a list for what**

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1 **the parents or guardians are expected to do in terms**
 2 **of follow-up steps, right?**
 3 A. Right.
 4 **Q. And that was go see the psychologist once**
 5 **a week, right?**
 6 A. Right. I'm actually looking at that note
 7 about the next one, so --
 8 **Q. Sure.**
 9 A. Go ahead and ask me.
 10 **Q. Tell me about the note on the next one**
 11 **that talks about parents giving permission to share**
 12 **information.**
 13 A. So based on that, I know I had the
 14 conversation with Mom about signing the release forms,
 15 and so I must have noted that Mom was going to think
 16 about it. And if she wanted us to have wraparound
 17 services, she would contact me if she wanted to sign
 18 those release forms or have that communication.
 19 **Q. And she did not --**
 20 A. Right.
 21 **Q. -- ultimately give those to you?**
 22 A. Right.
 23 **Q. And you never called her to follow up on**
 24 **those release forms, correct?**
 25 A. I don't have it noted anywhere that I

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1 did.
 2 **Q. Well, do you have an independent**
 3 **recollection of ever calling her?**
 4 A. No, I don't. I think that Kevin had met
 5 with her when -- I think they might have discussed it
 6 at that two-week follow-up meeting but I don't -- you
 7 know, I think that other people had asked about it.
 8 Because they were meeting with Mom, but I don't think
 9 for me -- but I don't think -- I mean, I didn't have a
 10 conversation.
 11 **Q. Okay. Did you ever consider requiring**
 12 **Karl to or his mother to sign those waiver forms and**
 13 **share the results of his therapy as a condition to**
 14 **reentry at the school?**
 15 A. It's my understanding that we can't have
 16 that as a condition to reenter school. I think if
 17 there was a safety concern -- as far as I knew, we
 18 can't make that a required condition that a student
 19 has to go to therapy or be seen by somebody in order
 20 to come back to return.
 21 **Q. Right. Except in cases where there is an**
 22 **articulable safety concern, right?**
 23 A. Right.
 24 **Q. Well, Karl had threatened to kill a**
 25 **teacher.**

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1 A. Right. And Mom --
 2 **Q. Isn't that an articulable safety concern?**
 3 A. And Mom had had him assessed per -- Kevin
 4 had had a conversation with Mom that he had taken him
 5 to get assessed that weekend in between and that they
 6 had deemed him to be safe to return.
 7 **Q. Okay. And you could have conditioned his**
 8 **reentry on seeing what that therapist actually said**
 9 **because, you know, parents sometimes lie?**
 10 A. I could have. And I -- I mean, when we
 11 do -- when we have kids that go to the hospital and
 12 when we do a mental health reentry, we usually ask
 13 them for -- to bring whatever paperwork or discharge
 14 summaries from the hospitals with them, and I didn't
 15 think of that with this.
 16 **Q. Okay. And I guess that's my question,**
 17 **why didn't you condition Karl's reentry on seeing what**
 18 **the other therapist actually said, rather than what**
 19 **Mom said that therapist said?**
 20 A. I don't know. I mean, I know that when
 21 this happened -- and then I feel like I was -- the
 22 incident happened, and then I felt like I was informed
 23 while he was out of the school that he would be -- I
 24 was asked to be part of a reentry meeting, then we
 25 talked about the threat assessment, so I feel like it

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1 happened and -- yeah, there was pieces that I
 2 obviously could have -- that I could have had more
 3 information about. And I don't have an answer to why
 4 -- I mean, other than what I'm giving you about it.
 5 **Q. Okay. There was a reentry -- well, I**
 6 **guess I think it has been characterized as an action**
 7 **plan review meeting on September 26. You're familiar**
 8 **with that meeting?**
 9 A. I was not in attendance at that meeting.
 10 **Q. Agreed. Understood. That was my first**
 11 **point. You know the meeting happened, right?**
 12 A. Right, because that was the follow-up
 13 meeting that was supposed to happen after this.
 14 **Q. Right. What was the purpose of that**
 15 **meeting as you understood it?**
 16 A. To see where Karl was at in terms of
 17 feelings towards Tracy to check and see how he was
 18 doing with being back at school, see how things have
 19 been going over the course of -- since his reentry.
 20 **Q. So to check on whether or not the threat**
 21 **had dissipated; is that right?**
 22 A. Yeah.
 23 **Q. Okay. And I understand that you did not**
 24 **participate in that September 26 meeting. My**
 25 **question, though, is between September 9 when this**

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1 **form was filled out and September 26, what, if**
 2 **anything, did you do to check on how Karl Pierson was**
 3 **doing with his reentry into the school and his mental**
 4 **state?**
 5 A. I think just having conversations with
 6 Kevin, with the counselor, to see if there were any --
 7 if anything had come up. I know Tracy and I had
 8 touched base. It was that e-mail with Mom.
 9 **Q. Okay. Anything else?**
 10 A. Not that I -- not -- no, not that I
 11 recall.
 12 **Q. Okay. What can you tell me about the**
 13 **conversations you had with Kevin Kolasa between**
 14 **September 9 and September 26 about Karl Pierson?**
 15 A. I don't recall anything happening. I
 16 mean, I think it might have just been -- I honestly
 17 don't recall. I feel like there were conversations,
 18 but I don't know if they were formal conversations.
 19 **Q. Okay.**
 20 A. More of like a check-in.
 21 **Q. Okay. Did you check in with any of**
 22 **Karl's teachers and see what their impression was of**
 23 **how Karl was doing?**
 24 A. Not that I remember, no. Because I don't
 25 remember -- I don't -- I don't think I did because

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1 usually teachers would come to us with any concerns
 2 that they had, or it would go to the counselor first,
 3 and then the counselor would let us know their
 4 concerns. So I feel like -- I'm sure that there
 5 wasn't.
 6 **Q. Do you recall any of your conversations**
 7 **with Kelly Talen during this time frame about Karl**
 8 **Pierson?**
 9 A. She wasn't in the building.
 10 **Q. What about any conversations you may have**
 11 **had with Astrid during this time period between the**
 12 **threat assessment and the action plan review meeting?**
 13 A. I mean, I remember telling her that the
 14 threat assessment was done. I know that Kevin asked
 15 her to be part of that follow-up meeting, or I think
 16 she was part of that follow-up meeting. I know she
 17 had -- I'm pretty sure that she was -- she had helped
 18 out with speech and debate the year before, so she
 19 knew Karl.
 20 **Q. Okay. Do you recall any conversations**
 21 **with Astrid about checking on how Karl had been doing**
 22 **in that two-week period?**
 23 A. I'm pretty sure I did, but I don't know
 24 -- you know, I feel like we -- I'm sure I had a
 25 conversation with her.

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1 **Q. Okay.**
 2 A. I mean, she had to -- we had to have had
 3 some conversations, because she knew that she was
 4 going to be part of that meeting.
 5 **Q. And that's one of the questions I had is,**
 6 **can you tell me why you weren't a part of that**
 7 **follow-up meeting?**
 8 A. Well -- and I wasn't indicated in that
 9 meeting with -- when I -- when we first set up the
 10 meeting, I asked Kevin if I should be part of that,
 11 and he didn't think that it would be necessary. So
 12 that wasn't part of it. And I also -- I know when it
 13 actually was scheduled, I did ask if I should be part
 14 of it, and I think there was a conflict. I actually
 15 wasn't in the building when it occurred. So I think
 16 that's another reason why Astrid was in the meeting.
 17 **Q. Okay. And what did you do to help**
 18 **prepare Astrid for that meeting?**
 19 A. I don't remember. I don't know if I -- I
 20 don't know if Kevin had more conversations with her.
 21 I don't know.
 22 **Q. Okay. But you didn't, as best as you can**
 23 **recall, sit down with Astrid and walk her through your**
 24 **notes on this document?**
 25 A. I don't think so. As best as I can

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1 recall, I don't think so.

2 **Q. Okay. Did you ever talk to Karl Pierson**

3 **after September 9?**

4 A. I mean, there was one time where he

5 dropped by after Mom had asked about testing.

6 **Q. Oh, right.**

7 A. He did drop by and ask if I -- if I ever

8 did cognitive testing or IQ testing, and I said that I

9 did for special education evaluations, but I typically

10 didn't just to test kids.

11 **Q. And that was after this threat**

12 **assessment?**

13 A. Right. It might have been a couple

14 months later.

15 **Q. Oh, it was a couple months?**

16 A. Or a month. Maybe like a month. After

17 the mom e-mailed, so maybe a month later, because I

18 think Mom e-mailed like two or three weeks later with

19 a question or a month later. I can't remember. It

20 was pretty close to that time, because I think he

21 asked, and I said, Oh, I think your mom e-mailed me

22 about that.

23 **Q. Okay. And I've read in the sheriff's**

24 **report that that was -- that struck you as sort of odd**

25 **and confirmed your belief that he was a narcissist?**

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1 A. I guess if I said that -- I think it's --

2 I mean, most kids don't come up -- I think most kids

3 don't come up and ask if they can get IQ testing.

4 **Q. Did it strike you as odd that Karl asked**

5 **you for an IQ test?**

6 A. I don't recall saying those words that it

7 was odd. I think that most -- I guess maybe it was

8 not as odd because Mom had just asked about special ed

9 testing, but I don't have a lot of kids come up and

10 ask me to do IQ testing.

11 **Q. Okay. Other than when Karl came to see**

12 **you to ask for an IQ test, did you speak to Karl at**

13 **any other time after December -- or after September 9?**

14 A. I think I might have said hi in the

15 hallway, but I didn't have contact with him.

16 **Q. Okay. Is there a reason you didn't call**

17 **him into your office and just ask him, How are things**

18 **going, how are things with Murphy, anything like that**

19 **just to connect with him?**

20 A. No. And I think, again -- it's not an

21 excuse, but I think that I had a lot of -- I had a lot

22 of special ed kids that I needed to take care of that

23 -- other responsibilities, and I know I didn't follow

24 up. So I don't have any reason besides the fact

25 that --

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1 **Q. Okay. Did you come away from this**

2 **September 9 threat assessment meeting thinking that**

3 **Karl was a kid who needed help?**

4 A. I'm sure that I did.

5 **Q. Okay. I mean --**

6 A. And I know he was getting help through,

7 you know, outside counseling, and it seemed like there

8 was -- that there had been contact with Kevin and that

9 people had him on their -- that people had worked with

10 him.

11 **Q. My question, though, was going to be**

12 **this, what did you do to make sure that he was**

13 **actually getting that help?**

14 MR. NATHAN: Objection. Asked and

15 answered. You may answer.

16 A. I mean, I feel like you've asked me that.

17 I've -- you know, I had the -- I don't know how else

18 to respond. Do I wish I had done more, absolutely.

19 **Q. (BY MR. ROCHE) Now, we talked about the**

20 **fact that you weren't at the September 26 meeting?**

21 A. Right.

22 **Q. Did someone report back to you after that**

23 **meeting what had happened?**

24 A. I think I asked Kevin.

25 **Q. And what did he tell you?**

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1 A. That they talked, and it seemed like it

2 was okay for him to go back to participate in speech

3 and debate. That's pretty much what I recall.

4 **Q. Okay. And you now -- well, strike that.**

5 **We've talked about the fact that**

6 **teachers, security, and other people weren't notified**

7 **of the threat assessment that you had done on Karl,**

8 **right, because he was characterized as a low-level**

9 **threat?**

10 A. Right. I mean --

11 **Q. And you've mentioned that your**

12 **expectation was that if there were concerning**

13 **behaviors, they would be brought to your attention,**

14 **right?**

15 A. Right. They're typically brought to the

16 counselors first or the administrators, and then if

17 they wanted -- if they felt like there was further

18 consultation or they needed more help, they would ask.

19 **Q. Do you think that those teachers and**

20 **other people at the school would be more likely to**

21 **report concerning behaviors if they knew that there**

22 **had already been concerning behaviors involving a**

23 **particular student?**

24 A. So I guess I'm unsure of your question.

25 **Q. If, for instance, Karl's teachers had**

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1 **been told he threatened to kill Tracy Murphy, and we**
 2 **had to do a threat assessment on this kid, keep an eye**
 3 **out on him and let us know if anything strange comes**
 4 **up, they would be more likely to report to you or**
 5 **Kevin Kolasa this happened or that happened?**
 6 A. I'm assuming so, yes.
 7 **Q. And the reason I'm asking about that is**
 8 **there were a number of incidents after --**
 9 A. Right.
 10 **Q. -- your threat assessment that I'm**
 11 **assuming weren't brought to your attention?**
 12 A. Correct.
 13 **Q. Okay. And I'm going to ask you to take a**
 14 **look at Exhibit 11, which are those written questions**
 15 **and answers --**
 16 A. Yep.
 17 **Q. -- that I mentioned. Do you have those?**
 18 A. Yes.
 19 **Q. Go to page 9, if you would, please. And**
 20 **there's a numbered item 11. Do you see that?**
 21 A. Yep.
 22 **Q. And that's an incident where Karl was**
 23 **seen looking at guns on his computer in the cafeteria,**
 24 **right?**
 25 A. Right.

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1 **Q. Were you aware of that incident prior to**
 2 **the shooting?**
 3 A. No.
 4 **Q. And is that the kind of thing that would**
 5 **have been important for you to know, having just**
 6 **performed a threat assessment on him the month**
 7 **previously?**
 8 A. Yes.
 9 **Q. And would you have done something with**
 10 **this information had it been provided to you?**
 11 A. Yes.
 12 MR. NATHAN: Objection to the form of the
 13 question. You may answer. Your answer was yes?
 14 A. Yes.
 15 **Q. (BY MR. ROCHE) What do you believe you**
 16 **would have done if you had been told that Karl**
 17 **Pierson, who had just threatened to kill a teacher,**
 18 **was found looking at guns in the cafeteria?**
 19 MR. NATHAN: Same objection. You may
 20 answer.
 21 A. I would have reported it to Englert, the
 22 SRO. I would have had conversations probably with
 23 Mr. Meredith and -- but I would have reported it to
 24 the authorities or to James, who was in the building.
 25 **Q. (BY MR. ROCHE) Sure. Would you have**

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1 **spoken to his parents?**
 2 MR. NATHAN: Same objection. You may
 3 answer.
 4 A. Probably, yeah. I mean, somebody would
 5 have.
 6 **Q. (BY MR. ROCHE) Sure. And is it possible**
 7 **you might have wanted someone to search his computer,**
 8 **his daily planner, or his phone, his tablet, any of**
 9 **those things that we all know now by that point had**
 10 **information about his plans to kill as many people as**
 11 **possible at Arapahoe High School?**
 12 MR. NATHAN: Same objection. You may
 13 answer.
 14 A. Yes.
 15 **Q. (BY MR. ROCHE) And what about the**
 16 **incident on November 1, 2013, in Mrs. Lombardi's**
 17 **Spanish class talking about drinking tequila in class?**
 18 A. What's your question?
 19 **Q. My question is, was that an incident you**
 20 **were aware of?**
 21 A. No.
 22 **Q. Would that qualify as a concerning**
 23 **behavior to you in this context?**
 24 A. In the context of doing this threat
 25 assessment, I mean, I'm sure it would be a factor to

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1 look at. I mean, I feel like a lot of kids talk about
 2 drinking, I mean . . .
 3 **Q. Okay. What about the next incident where**
 4 **Karl apparently made a heckling remark to some**
 5 **students during the presentations in Mr. Hansen's**
 6 **class? Is that something you were aware of?**
 7 A. No.
 8 **Q. Is that something you would have liked to**
 9 **have known about?**
 10 A. Sure.
 11 **Q. What about the incidents on December 11**
 12 **when Karl got locked out of Mrs. Lombardi's class? Is**
 13 **that something you were made aware of?**
 14 A. No.
 15 **Q. Were you in school on December 11? It**
 16 **was a Wednesday, two days before the shooting.**
 17 A. To the best of my recollection, I was.
 18 **Q. Okay. And the reason I ask is you've**
 19 **said your expectation is the teachers or**
 20 **administrators are going to bring concerning behaviors**
 21 **to you, right?**
 22 A. They bring -- teachers report stuff to
 23 their counselors or administrators first. That was
 24 usually the steps that they would take, and then those
 25 people would consult or -- not always, but . . .

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1 **Q. Okay. And is it concerning to you as a**
 2 **school psychologist that there are a number of,**
 3 **certainly what I would characterize as concerning,**
 4 **behaviors that occurred involving Karl Pierson in the**
 5 **two months after your threat assessment, and none of**
 6 **them made their way to you?**
 7 A. Yes.
 8 **Q. And does that change your view on how**
 9 **proactive and inquisitive you think you ought to be as**
 10 **you follow up on these types of threat assessments?**
 11 A. I think that I am proactive and
 12 inquisitive. I mean, I think that it would change
 13 maybe the need to know or how to -- you know,
 14 communicating with teachers so that they could --
 15 would be more aware of situations so that they could
 16 alert us if they had information to share.
 17 **Q. Okay. Sorry to jump around a little bit,**
 18 **but one of the things I wanted to ask you about was**
 19 **your discussion with Tracy Murphy shortly after the**
 20 **threat assessment. And you mentioned that you**
 21 **recalled talking with Tracy, right?**
 22 A. Yep.
 23 **Q. And one of the things that he told you in**
 24 **that conversation was that he was seriously**
 25 **considering quitting his job?**

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1 A. Right.
 2 **Q. Had you ever heard a teacher indicate**
 3 **that they were thinking of quitting their job to get**
 4 **away from a threat that had been made by a student?**
 5 A. That's the only threat that I recall
 6 being made towards -- you know, to kill them, so no.
 7 **Q. What was your reaction when Tracy told**
 8 **you he was seriously thinking about quitting his job**
 9 **to minimize the threat that Karl posed?**
 10 A. I was alarmed and worried about Tracy and
 11 what his concerns were and wanted to try to reassure
 12 him or talk to him about his feelings.
 13 **Q. And what did you say to Tracy after he**
 14 **told you that he was thinking about quitting his job**
 15 **because of the threat that Karl Pierson had made?**
 16 A. I encouraged him to talk to
 17 administration, to Kevin, about his concerns.
 18 **Q. Okay. Did you talk to anybody in the**
 19 **administration about Tracy Murphy's concerns?**
 20 A. I think I talked to Kevin about it, and I
 21 can't remember if I talked to Natalie.
 22 **Q. Okay. Did you do any follow-up with**
 23 **Tracy about his concerns?**
 24 A. I don't remember. I feel like we've -- I
 25 honestly can't remember. I feel like we had

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1 conversations, but I don't -- maybe one. I don't feel
 2 like we talked again about it.
 3 **Q. But you don't remember taking his**
 4 **concerns to anybody other than Kevin Kolasa?**
 5 A. I know I talked to Kevin about it, but I
 6 don't remember -- I feel like I talked to -- yeah, I
 7 can't say with certainty like who else I did.
 8 **Q. Okay. Did you -- tell me about the**
 9 **conversation you had with Kevin Kolasa about Tracy's**
 10 **concerns.**
 11 A. I think it was just that Tracy was
 12 continuing to have concerns.
 13 **Q. Did that cause you to rethink whether or**
 14 **not your assessment of Karl as a low-level threat was**
 15 **correct?**
 16 A. I still -- you know, the -- with the
 17 information I had, I still think the determination
 18 that we made at that point was accurate. But I think
 19 if I had all of these other pieces -- I mean, yeah, I
 20 was also concerned about Tracy, of course, but I think
 21 if we had other pieces of information that would have
 22 been helpful.
 23 **Q. Let's take a very short break. I need to**
 24 **get one more document.**
 25 **(Recess taken, 3:51 p.m. to 4:04 p.m.)**

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1 **(Deposition Exhibit 40 was marked.)**
 2 **Q. (BY MR. ROCHE) Exhibit 40 is a document**
 3 **that I suspect you haven't seen previously, but I'll**
 4 **ask, have you seen this document?**
 5 A. No.
 6 **Q. Okay. It is a progress report from**
 7 **Arapahoe Sheriff's Office relating to the school and**
 8 **describes or summarizes some student interviews that**
 9 **were done. Towards the bottom of page 1 of**
 10 **Exhibit 40, the author, who is an investigator with**
 11 **the sheriff's department, writes that he was informed**
 12 **by Lieutenant Kevin Heaton that a female, later**
 13 **identified as blank, had told the school psychologist,**
 14 **Dr. Song, that Karl Pierson told her that he had**
 15 **bought a shotgun named Kurt Cobain prior to**
 16 **December 13. Do you see that?**
 17 A. I do see that.
 18 **Q. Is that true?**
 19 A. I don't recall that ever -- that
 20 conversation ever happening.
 21 **Q. Let me ask it differently. Did you know**
 22 **prior to the shooting that Karl had a shotgun?**
 23 A. No.
 24 **Q. Would that be a conversation --**
 25 A. If I --

201

1 **Q. -- that would have stuck in your mind?**
 2 A. Yes. And if I had known, I would have
 3 done something about it.
 4 **Q. Okay. Obviously, I don't know who this**
 5 **student is that's referred to here. Do you have any**
 6 **idea who that is?**
 7 A. No.
 8 **Q. Okay. Had you seen that statement or**
 9 **heard about that statement prior to just now?**
 10 A. No.
 11 **Q. And I assume you've read the sheriff's**
 12 **report?**
 13 A. I haven't.
 14 **Q. You have not --**
 15 A. I have read excerpts, but I have not read
 16 it in its entirety, no.
 17 **Q. Well, in the sheriff's report, you may**
 18 **have seen that -- something like a dozen different**
 19 **students reported knowing that Karl had a shotgun. Do**
 20 **you recall seeing that in the report?**
 21 A. No.
 22 **Q. Were you aware prior to right now that**
 23 **there were multiple students who were aware and had**
 24 **been shown photographs of the shotgun that Karl**
 25 **bought?**

202

1 MR. NATHAN: You can answer all of these
 2 questions, but do not discuss discussions you and I
 3 had.
 4 MR. ROCHE: Agreed.
 5 A. Can you repeat the question? Sorry.
 6 **Q. (BY MR. ROCHE) Sure. Were you aware**
 7 **prior to today that multiple students at Arapahoe High**
 8 **School knew that Karl had bought a gun?**
 9 A. I think I had heard since -- I mean, I
 10 have a few students, yes.
 11 **Q. Okay. And is it your understanding that**
 12 **not one of those students reported the fact that Karl**
 13 **had bought a gun to anyone at the school?**
 14 A. Right. That's -- I mean, I -- right,
 15 that's my understanding.
 16 **Q. Does it raise any concerns in your mind**
 17 **about the culture at the school or the training**
 18 **provided to the students that so many kids knew Karl**
 19 **had bought a gun and yet none of them reported it to**
 20 **the school?**
 21 A. It's alarming, yes, that students hadn't
 22 reported it to the school or to their parents. I'm
 23 assuming that if they had reported it to some parents,
 24 they would have done something as well. So, yes, it's
 25 alarming.

203

1 **Q. Now, it's my understanding -- well,**
 2 **strike that.**
 3 **Were you at school on December 13?**
 4 A. Yes.
 5 **Q. And how did you become aware that there**
 6 **was a shooting?**
 7 A. I was in the main office, and all of a
 8 sudden there was commotion. And I heard the -- we
 9 were told that -- told to go -- I think somebody said
 10 there is a lockdown, and we were told to go into the
 11 conference room. And we were in the conference room,
 12 and there were several people with radios, so we heard
 13 a lot of the radio transmissions.
 14 **Q. Okay. Some witnesses, for instance,**
 15 **Tracy Murphy, said as soon as he heard the first shot,**
 16 **he knew it was Karl before he ever saw him. Did you**
 17 **have that same thought?**
 18 A. It was definitely a thought that ran
 19 through my head.
 20 **Q. And when you found out afterwards that it**
 21 **was Karl, you weren't surprised, were you?**
 22 A. I mean, it -- no, not really. I mean, I
 23 was -- I don't know how to answer that. I mean, it's
 24 always -- it's shocking, yeah.
 25 **Q. After the shooting occurred, the sheriff**

204

1 **wanted to talk to you, didn't he -- or the sheriff's**
 2 **office?**
 3 A. Not that day, I don't think.
 4 **Q. Okay. How soon after the shooting did**
 5 **the sheriff's office reach out to you as part of its**
 6 **investigation?**
 7 A. I think it was -- we went back to
 8 school -- I think we went back on Tuesday, the
 9 counselors and administrators and myself, and then I
 10 think staff went back Wednesday, Thursday. So it was
 11 one of those days, Wednesday or Thursday.
 12 **Q. The 17th, 18th, 19th window?**
 13 A. One of those days.
 14 **Q. And the sheriff's report is marked as**
 15 **Exhibit 14 in, I think, the first volume of books in**
 16 **front of you. And you said you've read parts of this,**
 17 **but not all of it, right?**
 18 A. Right.
 19 **Q. Is there a reason you haven't read the**
 20 **whole thing?**
 21 A. I haven't really been able to read or --
 22 I have difficulty reading even -- yeah, a lot of the
 23 -- I just had difficulty reading the report.
 24 **Q. Okay. You understood that one of the**
 25 **reasons the sheriff's office and its investigators**

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1 **wanted to speak to you was because you had performed**
 2 **the threat assessment that said Karl was a low-level**
 3 **threat, and in retrospect, he clearly was a very**
 4 **serious threat, right?**
 5 A. Correct. But, again, I think when we
 6 conducted the threat assessment, I still stand by that
 7 decision and I -- with the information that we have
 8 now, I mean, I feel like the question that you're
 9 asking is a little misleading.
 10 **Q. Okay. Well, actually, what I'm trying to**
 11 **get at is this, you knew that it was important to the**
 12 **sheriff's department to gather as much information as**
 13 **it could about how this happened, right?**
 14 A. Right.
 15 **Q. And it was important to Claire's parents**
 16 **to find out everything they could about what led up to**
 17 **the shooting of their daughter, right?**
 18 A. Right.
 19 **Q. And so part of that was for the sheriff's**
 20 **investigators to talk to you, right?**
 21 A. Right.
 22 **Q. And if you'll turn to page 13 of the**
 23 **sheriff's investigative report, you'll see that**
 24 **there's a reference to you, right?**
 25 A. Right.

206

1 **Q. And it says that you provided the**
 2 **following information, that you had performed the**
 3 **threat assessment for Karl after he made the threat**
 4 **toward Tracy Murphy, right?**
 5 A. Right.
 6 **Q. It says you did not provide any further**
 7 **information regarding Karl, correct?**
 8 A. That's what it says.
 9 **Q. Okay. And I've reviewed all of the**
 10 **materials from the sheriff's department, and I don't**
 11 **see a statement from you. Okay?**
 12 A. And I don't think I was ever asked for
 13 one. I -- they came to the school, they asked me for
 14 -- or they said that they needed to talk to me. I was
 15 taken into the main office conference room. There was
 16 two investigators there. One was videotaping, the
 17 other was asking me questions. And we sat there for,
 18 I don't know how long, half an hour, 45 minutes. I
 19 don't know how long. My sense of time was a little
 20 bit off.
 21 **Q. Okay. Well, my --**
 22 A. But I did sit there with them.
 23 **Q. Okay. And you answered all of their**
 24 **questions?**
 25 A. I answered all of their questions. So I

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1 don't know -- I don't know why it would say -- I don't
 2 know what other information they asked me, but I
 3 answered all of their questions.
 4 **Q. Because in fairness, I read this and got**
 5 **the impression that you declined to cooperate with the**
 6 **investigation.**
 7 A. I mean, I wouldn't have any reason not
 8 to. I remember feeling very on the defensive because
 9 I was scared. I mean, it's not typical that you get
 10 -- I mean, we were all sitting there, I think, on the
 11 first or second day back as staff and to have
 12 investigators come through and just kind of pull you
 13 is very, I mean, shocking. I don't know what -- I
 14 mean, I don't know what else to say.
 15 **Q. Okay. But there were no questions that**
 16 **the sheriff's department or its investigators asked**
 17 **you that you declined to answer?**
 18 A. I honestly don't recall ever saying I was
 19 declining to answer any questions. I feel like I sat
 20 there and answered questions that they presented to me
 21 and questions that they had.
 22 **Q. Okay. And I've heard from a number of**
 23 **witnesses in this case that they were discouraged from**
 24 **discussing the shooting after they got back to school.**
 25 **My question to you is, was that your experience as**

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1 **well?**
 2 A. I think it was -- I mean, I don't know if
 3 it was -- I felt like I wasn't supposed to be
 4 discussing anything with anyone.
 5 **Q. Okay. And what was the source of that**
 6 **feeling? How did you get that impression that you**
 7 **weren't supposed to be talking about what happened**
 8 **with anyone?**
 9 A. I think because I had met with the
 10 attorney.
 11 **Q. Okay. And that I don't want to get**
 12 **into -- I mean, I do but I'm not allowed.**
 13 MR. NATHAN: You can just say advice of
 14 counsel.
 15 THE DEPONENT: Right.
 16 A. But I wasn't advised at that point. I
 17 think I just was -- I don't know if anybody ever
 18 explicitly said, Don't talk to anyone but I think --
 19 **Q. (BY MR. ROCHE) Okay. And were you ever**
 20 **part of any sort of debrief within the school about**
 21 **mistakes that maybe got made or lessons that could be**
 22 **learned from this tragedy?**
 23 A. We had debriefs after. I mean, I think
 24 we had a lot of conversations about things that could
 25 have been done differently, but I also think that in

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1 that first semester after, I think emotions were so
 2 high and I think a lot of people -- I don't know if we
 3 could really see lessons learned at that point
 4 clearly, because we were in the midst of it, of
 5 learning what lessons needed to be learned.
 6 **Q. Okay. And I forgot to tell you this at**
 7 **the beginning of the deposition, which is on me, but I**
 8 **will tell you right now, my last question will be**
 9 **that, what lessons do you think can be learned and**
 10 **need to be learned from what happened at Arapahoe a**
 11 **year ago in December. So we'll get back to that.**
 12 **There were a couple of things I wanted to ask you**
 13 **about.**
 14 **(Deposition Exhibit 41 was marked.)**
 15 **Q. Exhibit 41 is a document that I received**
 16 **from LPS as part of this arbitration, and you'll see**
 17 **it's a PowerPoint presentation that was presented at a**
 18 **faculty meeting on February 12, 2014, about FERPA. Do**
 19 **you see that?**
 20 A. Yep.
 21 **Q. Were you at this faculty meeting?**
 22 A. I was.
 23 **Q. And was this a meeting that was called to**
 24 **discuss FERPA as a result of concerns about how**
 25 **information was shared about Karl Pierson?**

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1 A. Yeah. Yeah. I'm sure it was a result of
 2 that.
 3 **Q. Okay. What can you tell me about the**
 4 **concerns that had been expressed about how FERPA**
 5 **affected information sharing about Karl Pierson?**
 6 A. I don't know if I understand what you're
 7 asking. Sorry.
 8 **Q. Okay. I'll give you some broader**
 9 **context. One of the things that is happening here is**
 10 **the very smart gentleman at the end of the table works**
 11 **for the University of Colorado, and he and a colleague**
 12 **are going to be writing a report about what is learned**
 13 **through this arbitration. And among other things,**
 14 **it's going to be presented to a committee at the**
 15 **legislature that is studying school safety issues and**
 16 **making recommendations on how to make schools safer.**
 17 **One of the issues that has come up during the course**
 18 **of this arbitration is whether or not certain FERPA**
 19 **restrictions impeded the effective flow of information**
 20 **in the case of Karl Pierson.**
 21 **First, let me ask you very simply, do you**
 22 **believe that there were impediments or obstacles to**
 23 **the effective flow of information at Arapahoe High**
 24 **School about Karl Pierson?**
 25 A. Yeah.

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1 **Q. Okay. And what were those impediments as**
 2 **you understood them?**
 3 A. I mean, I just -- I felt like -- I don't
 4 know if it was necessarily due to FERPA. I feel like
 5 it was -- I don't even know if I have an answer to
 6 that. I don't know. I honestly don't know. I don't
 7 -- you know, I feel like information regarding
 8 students is kept private, unless there's, I think, the
 9 potential risk, and I think in that -- I don't know
 10 about the events afterwards and what kind of
 11 information should be relayed or the -- I don't know
 12 what information can be relayed about each student to
 13 general staff and teachers, because I think that there
 14 has to be some protection of confidentiality to
 15 protect that student's rights.
 16 **Q. Well, let me ask this, at the time that**
 17 **you performed the threat assessment on Karl Pierson,**
 18 **what was your understanding of when you were permitted**
 19 **to share what you knew about Karl Pierson with other**
 20 **members of the faculty and staff at Arapahoe High**
 21 **School?**
 22 A. When we conducted a threat assessment --
 23 **Q. Yes.**
 24 A. -- what was my knowledge about what
 25 information I could relay?

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1 **Q. At that point in time, what did you**
 2 **understand that you were allowed to share with Karl's**
 3 **teachers, for instance?**
 4 A. I didn't -- I don't know if I knew that I
 5 was able to share that the threat assessment was
 6 conducted. I felt like that was information that was
 7 still private for that child.
 8 **Q. Okay. So you believed you were not**
 9 **permitted to share the fact that a threat assessment**
 10 **had been conducted with Karl's teachers?**
 11 A. Yeah, just like a -- you know, typically
 12 with suicide assessments.
 13 **Q. And when you attended the presentation on**
 14 **FERPA that was done in February of 2014, was there a**
 15 **discussion of any misunderstandings or confusion about**
 16 **how FERPA applied --**
 17 A. I'm sure that there was.
 18 **Q. Tell me about those discussions, if you**
 19 **would.**
 20 A. If I can be -- honestly, all I -- I think
 21 that there were moments during that meeting and
 22 subsequent ones that I don't know if I was fully -- if
 23 I was fully present mentally, you know, the entire
 24 meeting, so . . .
 25 **Q. And I understand that, but my question is**

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1 to the extent you can remember, what can you tell me
 2 about the discussions about confusion within the
 3 school about what FERPA permitted and what it
 4 prohibited?
 5 A. I honestly can't remember from that
 6 meeting, I'm sorry. I can look over the PowerPoint
 7 and try to --
 8 Q. Well, if you look at page 4222, there's a
 9 list of exceptions to when information can be shared
 10 without parental consent, or I should say a list of
 11 exceptions to the requirement that parental consent is
 12 needed to share information. Do you see that?
 13 A. Yes.
 14 Q. And the very first exception is, "School
 15 officials with a legitimate educational interest,"
 16 right?
 17 A. Right.
 18 Q. Were you aware at the time you were doing
 19 Karl Pierson's threat assessment that that was an
 20 exception to the FERPA requirement for parental
 21 consent?
 22 A. I don't think so.
 23 Q. And what about the exception for
 24 disclosure to appropriate officials in cases of health
 25 and safety emergencies?

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1 A. I mean, I -- yeah, I think -- is that
 2 referring to authorities?
 3 Q. Well, I'm asking --
 4 A. Yeah, I think --
 5 Q. I'm asking what you understand it to
 6 mean.
 7 A. Well, yeah, if there's safety concerns
 8 that -- that, yes, you can notify.
 9 Q. And if you go to the next slide, it
 10 discusses what constitutes a legitimate educational
 11 interest. Do you see that?
 12 A. Yes.
 13 Q. And it talks about disclosing to persons
 14 with a need to know and a need to act. That wasn't
 15 something you knew at the time you did Karl Pierson's
 16 threat assessment; is that right?
 17 A. Let me just read -- can I read this?
 18 Q. Of course.
 19 A. So can you repeat your question?
 20 Q. Sure. Did you know at the time that you
 21 did Karl Pierson's threat assessment that there was an
 22 exception to FERPA that permitted you to disclose
 23 educational records to people who had a need to know
 24 and a need to act on the information contained in
 25 those records?

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1 A. I believe I did.
 2 Q. And what about the next bullet point? Do
 3 you have any understanding of what the process is for
 4 determining who has a legitimate educational interest?
 5 A. I don't know.
 6 Q. And the final bullet point indicates that
 7 one of the things to consider is whether or not a
 8 staff member has direct student contact when deciding
 9 whether or not that person has a right to know
 10 information about a student, right?
 11 A. Right.
 12 Q. Did you consider, as part of Karl
 13 Pierson's threat assessment, telling his teachers what
 14 you learned during that threat assessment?
 15 A. I did not.
 16 Q. Take a look, if you would, at Exhibit 17.
 17 MR. NATHAN: It's in the next book.
 18 MR. ROCHE: Is that where it cuts off?
 19 Q. (BY MR. ROCHE) And Exhibit 17 you'll see
 20 is a June 24 document titled "Administrative Review of
 21 LPS Threat Assessment Protocols." Do you see that?
 22 A. Yes.
 23 Q. And on the second page of it, there's a
 24 list of participants. And you are not listed among
 25 them.

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1 A. I was -- right.
 2 Q. Were you gone by then?
 3 A. Well, I had accepted the other position
 4 end of May, so I was still, I think, under the
 5 official contract, but, you know, being paid through
 6 July 1, I think, but I wasn't --
 7 Q. Did you have any input into this
 8 administrative review of the LPS threat assessment
 9 protocols?
 10 A. No.
 11 Q. Have you seen this document before?
 12 A. I have not.
 13 Q. Do you recall being asked by anybody
 14 after the shooting about the challenges that you as a
 15 school psychologist faced in performing threat
 16 assessments?
 17 A. Not for the purposes -- not for these
 18 purposes.
 19 Q. Well, were you asked that for any
 20 purposes?
 21 A. I was asked that by colleagues or -- you
 22 know, colleagues, but . . .
 23 Q. Tell me about those discussions. Who
 24 were they with?
 25 A. I think other counselors. I don't know

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1 specifics, but I know I've had -- I mean, I think it
 2 was the checking in about how people were doing, how
 3 -- I think it was a general conversation about
 4 frustrations with the process.
 5 **Q. Do you recall who any of those**
 6 **conversations were with?**
 7 A. I mean, I'm sure I had them with the
 8 other counselors, like Kirk Bast and Scott Wadsworth,
 9 the counselors that were in the building.
 10 **Q. Okay.**
 11 A. But I don't remember particular specific
 12 conversations. I feel like we all had conversations
 13 throughout that semester.
 14 **Q. And if you'll jump ahead, I know that**
 15 **this isn't a document that you've studied or helped**
 16 **prepare, but if you look at page 4049, and you'll see**
 17 **there's a list of seven key challenges noted by LPS**
 18 **staff in performing threat assessments. I'll give you**
 19 **a minute to look at them all, and are those all the**
 20 **frustrations that you -- are those all frustrations**
 21 **that you shared with the threat assessment process?**
 22 A. I don't know about the third one.
 23 **Q. That's the issues with how to explain to**
 24 **parents and what to share or not share?**
 25 A. Correct.

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1 **Q. That was not a frustration you had?**
 2 A. I think that it was just when we did a
 3 threat assessment, you had conversations with parents.
 4 You have to notify them and talk with them about it
 5 and I don't -- I don't think I really had an issue
 6 with it.
 7 **Q. Okay.**
 8 A. And I feel like we had to share
 9 information about their child with them.
 10 **Q. Did you have frustrations or concerns or**
 11 **challenges about the threat assessment process in**
 12 **addition to those listed here?**
 13 MR. NATHAN: Have you finished your
 14 review of which ones you were suffering from?
 15 THE DEPONENT: No. I don't know.
 16 **Q. (BY MR. ROCHE) Oh, sorry.**
 17 A. That's okay. I don't know if at the time
 18 there was confusion about notifying teachers and other
 19 staff. And then making a decision when staff have
 20 very different perceptions of the student. I mean,
 21 that -- these aren't -- those weren't all ones that I
 22 had ever shared, so . . .
 23 **Q. Why don't you walk through the list and**
 24 **tell me which ones were concerns or frustrations that**
 25 **you shared.**

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1 A. That I feel or that I've shared?
 2 **Q. No, that you feel.**
 3 A. The first one, choosing a level of risk,
 4 feeling like mental health bears a hard burden,
 5 definitely the lack of options when parents or
 6 students don't want mental health care or they're not
 7 accessing mental health care.
 8 **Q. Okay.**
 9 A. Definitely the follow-up plans. I think
 10 the last one.
 11 **Q. The logistical challenges of implementing**
 12 **a safety supervision plan?**
 13 A. I think it was more about the follow-up,
 14 the follow -- being able to -- yeah.
 15 **Q. Can you tell me what prompted the**
 16 **decision to leave Arapahoe at the end of the '14**
 17 **school year?**
 18 A. So I had been actually from the -- I went
 19 into Arapahoe or Littleton in 2008, and I actually had
 20 tried a couple of times to go back to Cherry Creek
 21 Schools. And so I think that thought had already been
 22 in my head, but I think after this it -- I had always
 23 felt like there was a really -- personally, I felt
 24 like there was a really strong mental health team in
 25 Cherry Creek Schools. I still had colleagues there

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1 that I would consult with, and I felt like I always
 2 had a lot of support there. And I appreciated the
 3 team process that I had. So, I mean, those were just
 4 more things to kind of push me in that direction. So
 5 I had -- knowing that I wanted to get back to Cherry
 6 Creek Schools, even prior to the shooting, but I think
 7 it kind of solidified my desire to go back.
 8 **Q. Okay. As with any answer, that prompted**
 9 **about three new questions.**
 10 A. Great.
 11 **Q. First, you mentioned that you consulted**
 12 **with folks at Cherry Creek from time to time. I**
 13 **assume, since I haven't heard about it, that you did**
 14 **not consult with any of them about Karl Pierson?**
 15 A. Right.
 16 **Q. And you mentioned that part of what drew**
 17 **you to return to Cherry Creek was that there was a**
 18 **very strong mental health team and a team approach and**
 19 **a strong support for the mental health staff in that**
 20 **district. My question is, how would you characterize**
 21 **Littleton's approach to mental health? Is it less**
 22 **team oriented, less strong, less supportive?**
 23 A. Well, there's -- the numbers are -- I
 24 mean, significantly -- the numbers are significantly
 25 lower. So, I mean, the number of schools that they

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1 have in Cherry Creek, they have a significant -- I
 2 mean, the team was exponentially bigger than the team
 3 at Littleton. So just based on schools, even. And
 4 they would have monthly meetings and, you know, do
 5 inservice trainings in Littleton, but I didn't
 6 personally feel -- I felt like there were a couple of
 7 people I could consult with, but I didn't -- I never
 8 felt that attached to like a team in Littleton.

9 **Q. Do you believe that the Cherry Creek**
 10 **School District places more of an emphasis on mental**
 11 **health and mental health care for its students than**
 12 **did Littleton?**

13 A. I do. But I also think it's because we
 14 didn't have the staffing. In Littleton, it was a
 15 smaller district, they didn't have the same
 16 allocations, I believe, so . . .

17 **Q. Okay. And you're now in the Aurora**
 18 **School District, right?**

19 A. No, Cherry Creek Schools.

20 **Q. Oh, Rangeview is not Aurora?**

21 A. Grandview.

22 **Q. Oh, Grandview is not Aurora?**

23 A. No. Cherry Creek Schools.

24 **Q. Oh, it's still Cherry Creek?**

25 A. Right.

222

1 MR. ROCHE: Let's just take a one-minute
 2 break, and I will be right back. If I'm not done, I'm
 3 really close.

4 (Recess taken, 4:44 p.m. to 4:49 p.m.)

5 **Q. (BY MR. ROCHE) Okay. Back on the**
 6 **record. As I mentioned a little bit ago, my last**
 7 **question in every deposition is the same and it's --**
 8 **right now you're talking to the committee at the**
 9 **legislature. What do you think can be done better to**
 10 **help prevent these -- what are your recommendations**
 11 **for how to make schools safer?**

12 A. I mean, one of the biggest things to me
 13 is ensuring that there's the appropriate staffing,
 14 that we have -- we have, you know, the recommended
 15 ratios, if possible, you know, staff. I'm talking
 16 about counselors and mental health. And I feel like
 17 we had half of what we probably should have had. So I
 18 feel like that's one of the biggest.

19 And I do -- actually, I do feel that same
 20 way with being back in Cherry Creek Schools, you know,
 21 we've got deans and administrators and I feel like we
 22 need -- there could be more people doing specifically
 23 discipline or behavior. I think that there are too
 24 many people trying to do too many jobs. So to me, I
 25 feel like that's one of the biggest ones that if --

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1 you know, you would be able to catch more things.

2 **Q. Okay. Any other recommendations?**

3 A. I mean, no, not right now. No.

4 **Q. Okay. Thank you for coming in and**
 5 **testifying. I know nothing about this is easy. I**
 6 **also know that Mr. Everall has a few questions for**
 7 **you, but thank you.**

8 A. Thanks.

9 MR. NATHAN: I'm going to stand here so I
 10 can hear.

11 EXAMINATION

12 BY MR. EVERALL:

13 **Q. Ms. Song, I'll be as brief as I can.**

14 MR. EVERALL: Could you mark this as an
 15 exhibit, please.
 16 (Deposition Exhibit 42 was marked.)

17 **Q. (BY MR. EVERALL) Do you recognize**
 18 **Exhibit 42 as what was referred to earlier in the**
 19 **deposition as the IEP e-mail exchange between you and**
 20 **Mrs. Pierson?**

21 A. Yes.

22 **Q. And the date of Mrs. Pierson's e-mail to**
 23 **you is Tuesday, September 10, down at the bottom**
 24 **here --**

25 A. Right.

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1 **Q. -- 2013 at 6:01 a.m., correct?**

2 A. Right.

3 **Q. So that would have been one day after the**
 4 **threat assessment meeting?**

5 A. Right.

6 **Q. And your response to her is that same**
 7 **day, Tuesday, September 10 at 7:40 a.m., correct?**

8 A. Correct.

9 **Q. And you copied Kolasa, Mr. Pierson, Karl**
 10 **Pierson, Kelly Talen, Astrid Thurnau, correct?**

11 A. Correct.

12 **Q. Did you ever hear back from Mrs. Pierson**
 13 **about your response there?**

14 A. No.

15 **Q. Did you hear back from Mr. Pierson?**

16 A. No.

17 **Q. And did you hear back from Karl?**

18 A. Just that one interaction where he asked
 19 about testing.

20 **Q. Did he specifically reference this e-mail**
 21 **exchange?**

22 A. No, I think I brought it up.

23 **Q. Okay. Then, as I recall on the threat**
 24 **assessment form itself, Exhibit 35, there's a**
 25 **reference to your offer to Mrs. Pierson of wraparound**

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1 **services. Do you need to look at that document?**
 2 A. No. I mean, I know what you're referring
 3 to.
 4 **Q. Do you remember that?**
 5 A. Yes.
 6 **Q. What are wraparound services?**
 7 A. Services so that communication can happen
 8 about the whole -- to look at the whole child
 9 involving outside agencies or the school, parents
 10 ensuring communication.
 11 **Q. So the concept is wrapping around the**
 12 **child; is that correct?**
 13 A. Correct.
 14 **Q. And, specifically, were you referring to**
 15 **communications with the --**
 16 A. Therapist.
 17 **Q. -- private therapist?**
 18 A. Correct.
 19 **Q. Okay. And just to be clear here,**
 20 **Mrs. Pierson never got back to you on that offer; is**
 21 **that right?**
 22 A. Correct.
 23 **Q. And the same for Mr. Pierson?**
 24 A. Correct.
 25 **Q. Did any of them -- at the meeting, did**

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1 **any of them indicate a desire to use those services?**
 2 A. At which meeting?
 3 **Q. Well, the threat assessment meeting.**
 4 A. No, I think I noted that Mom said she
 5 wanted to think about it. I don't know.
 6 **Q. Did she say why she wanted to think about**
 7 **it?**
 8 A. I think a lot of times parents are
 9 cautious about -- or they would like to -- sometimes
 10 parents are guarded about it. They want their
 11 personal information to be personal and not part of
 12 the school record. I think sometimes parents want it
 13 to be private.
 14 **Q. That's your experience, correct?**
 15 A. Correct.
 16 **Q. But did Mrs. Pierson say anything**
 17 **about --**
 18 A. About -- I don't recall.
 19 **Q. Okay.**
 20 A. I don't know if she -- I don't think she
 21 gave me a reason.
 22 MR. ROCHE: Steve, can you point me to
 23 where on Exhibit 35 you're referring to these
 24 wraparound services?
 25 MR. EVERALL: Sure. For the record, it's

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1 in the bottom right-hand corner of page 3 of the form.
 2 MR. ROCHE: Okay.
 3 THE DEPONENT: In my notes.
 4 **Q. (BY MR. EVERALL) Here, why don't you**
 5 **read your notes.**
 6 MR. ROCHE: Let me come around because,
 7 as I said, the handwriting, no offense, but it's a
 8 challenge.
 9 THE DEPONENT: I know, it's terrible.
 10 A. Possible mom will contact psych if
 11 services wanted for wraparound.
 12 MR. ROCHE: That says wraparound?
 13 THE DEPONENT: Yeah. Well, it says wrap
 14 and then ARD.
 15 MR. ROCHE: Okay. Thank you.
 16 MR. EVERALL: Sure.
 17 **Q. (BY MR. EVERALL) This commitment by --**
 18 **just to clarify the record, it seems like what your**
 19 **memory is is that Karl was already seeing a therapist**
 20 **at the time that you went in there on a regular basis?**
 21 A. That's what I recall, but that's -- I
 22 mean, it doesn't look that that from the notes,
 23 so . . .
 24 **Q. Well, it does talk about an evaluation**
 25 **that occurred on September 6, which would have been**

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1 **Friday before, correct?**
 2 A. I don't know. I'd have to reference
 3 that.
 4 **Q. I know it's late and you've been --**
 5 A. No, I just don't -- I don't know where it
 6 is.
 7 MR. ROCHE: It's 35 in the book.
 8 **Q. (BY MR. EVERALL) Here, I can show you**
 9 **mine.**
 10 MR. EVERALL: Can I share mine?
 11 MR. ROCHE: Sure.
 12 **Q. (BY MR. EVERALL) I'm reading from,**
 13 **again, page 3, Karl will discuss anger management with**
 14 **therapist and strategies to --**
 15 A. Deal.
 16 **Q. -- with future --**
 17 A. It says therapist, but I'm sure that was
 18 a mis -- I'm sure it was to discuss those -- the
 19 therapist, but to deal with future issues or future
 20 incidents.
 21 **Q. And then you -- here is the entry.**
 22 A. Right. Possible mom will contact psych
 23 if services wanted for wraparound.
 24 **Q. And then there's also entries in here**
 25 **about one time a week psych appointment and then**

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1 **family MD and psychologist one time a week?**
 2 A. Right. It's the same.
 3 **Q. So what is the interaction, if you will,**
 4 **between a psychologist and the therapist?**
 5 A. I'm --
 6 **Q. Same? Different?**
 7 A. I guess I'm using it the same,
 8 psychologist and therapist.
 9 **Q. And then on page 2, you've written under**
 10 **protective factors, community agencies, you've checked**
 11 **the box family practitioner --**
 12 A. Right. Psychologist to be determined
 13 appointment 9/6, tbd.
 14 **Q. Isn't that first?**
 15 A. I don't know.
 16 **Q. You don't know your own writing?**
 17 A. Yeah, is says first. Sorry.
 18 **Q. So it does say psychologist, first**
 19 **appointment 9/6?**
 20 A. Right.
 21 **Q. So that would have been the Friday**
 22 **before?**
 23 A. Right.
 24 **Q. And is that when Mrs. Pierson told you**
 25 **that the results from that appointment were that Karl**

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1 **was not a threat to himself or others?**
 2 A. Did she tell us at this meeting?
 3 **Q. Yes.**
 4 A. I'm assuming so, because I noted that
 5 they had that first appointment. I don't have it
 6 written down there, so . . .
 7 **Q. Well, that would have been a natural**
 8 **question to ask, correct --**
 9 A. Right.
 10 **Q. -- what were the results? And if there**
 11 **had been a problem detected by this psychologist at**
 12 **that 9/6 meeting or the once-a-week promise as it were**
 13 **going forward, would you have expected the**
 14 **psychologist to contact you?**
 15 A. If there were safety concerns, yes.
 16 **Q. And that never happened?**
 17 A. I did not ever receive a call from anyone
 18 else, from an outside provider.
 19 MR. EVERALL: That's all.
 20 MR. ROCHE: Thanks very much. You'll be
 21 given, through Mr. Nathan, a copy of your deposition.
 22 You'll have the opportunity to review it, make any
 23 corrections that you think are appropriate, and then
 24 sign it and Mr. Nathan will get it back to us. Thank
 25 you for coming in.

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1 WHEREUPON, the within proceedings were
 2 concluded at the approximate hour of 5:01 p.m. on the
 3 9th day of October, 2015.
 4 * * * * *
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I, ESTHER SONG, 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

 ESTHER SONG

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

 Notary public
 My Commission expires:

Michael Davis, et al. 10/9/15 (am)

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REPORTER'S CERTIFICATE

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

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

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

IN WITNESS WHEREOF, I have affixed my signature this 23rd day of October, 2015.

My commission expires September 24, 2016.

Reading and signing was requested.

Reading and signing was waived.

Reading and signing was not required.

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

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 Ashley D. Mahe
 Registered Professional Reporter

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