

1 JAG NO: 2015-0665A

2 DEPOSITION OF: NATHAN THOMPSON - October 12, 2015

4 IN RE THE ARBITRATION OF:

5 MICHAEL and DESIREE DAVIS,

6 Claimants,

7 and

8 LITTLETON PUBLIC SCHOOL DISTRICT,

9 Respondent.

10

11

12 PURSUANT TO NOTICE, the deposition of
13 NATHAN THOMPSON was taken on behalf of the Claimants
14 at 950 17th Street, Suite 2400, Denver, Colorado
15 80202, on October 12, 2015, at 9:02 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: NATHAN THOMPSON - October 12, 2015</p> <hr/> <p>IN RE THE ARBITRATION OF: MICHAEL and DESIREE DAVIS, Claimants, and LITTLETON PUBLIC SCHOOL DISTRICT, Respondent.</p> <hr/> <p>PURSUANT TO NOTICE, the deposition of NATHAN THOMPSON was taken on behalf of the Claimants at 950 17th Street, Suite 2400, Denver, Colorado 80202, on October 12, 2015, at 9:02 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 NATHAN THOMPSON: PAGE October 12, 2015</p> <p>By Mr. Roche 5</p> <p>DEPOSITION EXHIBITS: INITIAL REFERENCE</p> <p>Exhibit 43 Early and Imminent Warning Signs for School Violence, Reminders for Teachers and Other School Staff 107</p> <p>Exhibit 44 Threat Assessment in Schools: Latest Updates, April 12, 2013, Embassy Suites Conference Center 182</p> <p>Exhibit 45 Emergency Preparedness Incident Command Structure 182</p> <p>Exhibit 46 Document entitled "Danger Assessment, Addressing Threats, Suicide, & Bullying in Your Schools" 198</p> <p>Exhibit 47 Threat Assessment & Action Plan 260</p> <p>Exhibit 48 Threat Assessment & Action Plan 260</p> <p>DEPOSITION EXHIBITS: (Previously marked)</p> <p>Exhibit 4 Threat Assessment Best Practices and Procedures, Littleton Public Schools, Spring, 2011 94</p> <p>Exhibit 6 Threat Assessment Inquiry: A Summary of the Secret Service Eleven Key Questions 179</p> <p>Exhibit 7 Threat Assessment Guidance Document, LPS Danger Assessment, Suicide - Threats - Bullying 217</p>
<p style="text-align: center;">2</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>For the Claimants: MICHAEL J. ROCHE, ESQ. Lathrop & Gage, LLP 950 17th Street Suite 2400 Denver, Colorado 80202</p> <p>For the Respondent: STEVE EVERALL, ESQ. Semple, Farrington & Everall, P.C. 1120 Lincoln Street Suite 1308 Denver, Colorado 80203</p> <p>Also Present: Michael Davis Desiree Davis Carol Lembke Sarah Goodrum William Woodward Brian Ewert Michael Jones Linda Kanan (Appearing Telephonically)</p>	<p style="text-align: center;">4</p> <p>Exhibit 17 Littleton Public Schools, Administrative Review of LPS Threat Assessment Protocols, June 24, 2014 226</p> <p>Exhibit 35 Threat Assessment & Action Plan 52</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 77</p> <p>Exhibit 38 Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates 76</p>

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1 WHEREUPON, the following proceedings were
 2 taken pursuant to the Colorado Rules of Civil
 3 Procedure.
 4 * * * * *
 5 NATHAN THOMPSON,
 6 having been first duly sworn to state the whole truth,
 7 testified as follows:
 8 EXAMINATION
 9 BY MR. ROCHE:
 10 Q. Good morning, Mr. Thompson. You and I
 11 have met before, but just for the record, I'm Mike
 12 Roche. I appreciate you coming in today for your
 13 deposition in connection with the arbitration between
 14 Littleton Public School District and the Davis family.
 15 I wanted to start the day by just walking through some
 16 of the general rules of the road that apply to all
 17 depositions, and they're all directed at making sure
 18 we get as clean and as accurate of a record as we can
 19 get.
 20 A. Sure.
 21 Q. So the first rule of the road is it's
 22 important to give verbal answers, not head shakes or
 23 uh-huhs or huh-uhs. Ashley is really good, but it's
 24 very hard to distinguish down the road when this all
 25 gets typed up what those mean. So yeses, noes,

6

1 explanations, obviously are appropriate and very
 2 helpful.
 3 Second rule of the road that I tell
 4 everybody in every deposition is this is not meant to
 5 be an endurance test. So we're going to take a break
 6 every hour or so, regardless, but if there comes a
 7 time when you want a break, will you just tell me, and
 8 we'll take that break?
 9 A. Sure.
 10 Q. Okay. Third, you can see we've got a lot
 11 of folks in the room. We've also got somebody on the
 12 phone. It will be helpful to all of us if you speak
 13 up. Sometimes when people have a soft-speaking voice,
 14 it's hard for everyone to understand what's going on
 15 at our end of the table. Okay?
 16 A. Okay.
 17 Q. Then another important rule of the road
 18 is there will come a time when I ask you a question
 19 that you don't understand or just doesn't make sense,
 20 because it's a bad question on my part, that's my
 21 problem, not yours. So when that happens, and it
 22 will, will you just let me know, and I'll try to fix
 23 the question as best as I can?
 24 A. Yes.
 25 Q. As you have probably heard, this

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1 arbitration has -- in my view, it's got two components
 2 to it. And I want to tell you what they are and what
 3 the arbitration is about and what it's not about. The
 4 two components are a backward looking component, which
 5 is to investigate and examine what led up to and how
 6 the shooting on December 13 that took Claire Davis'
 7 life, and for that matter, Karl Pierson's life, how
 8 that happened, how that -- what led up to it and what
 9 was done in the days, weeks, months, and, frankly, in
 10 some respect, years leading up to that tragedy. The
 11 second component of it is trying to figure out what
 12 can be learned from that and what can be done to help
 13 prevent similar tragedies from happening in the
 14 future. Do you understand that?
 15 A. Yes.
 16 Q. Okay. As I mentioned, I wanted to tell
 17 you that's what the arbitration is about. What it's
 18 not about is determining blame or assigning negligence
 19 to any person or any party or figuring out whose fault
 20 that shooting was. That's not the objective. Nobody
 21 here is asking for money damages. That's not what the
 22 Davises want. That's not going to be the outcome of
 23 this arbitration. It's simply to learn what we can so
 24 nobody else has to go through what Mike and Desiree
 25 have had to go through. Okay?

8

1 A. Okay.
 2 Q. All right. Why don't we start with --
 3 oh, yeah, one other thing, as I suspect Mr. Everall
 4 has explained to you, there is what is called a
 5 sequestration order in effect for this arbitration.
 6 As you know, the end result of this arbitration is
 7 going to be a study or studies that are published at
 8 the end of this process, and they will be given to the
 9 school safety committee over at the Colorado
 10 legislature. But in the meantime, what's happening in
 11 this arbitration is private. We don't want --
 12 frankly, LPS doesn't want information leaking out into
 13 the media piecemeal. And one of the ways that the
 14 court has -- or the arbitrator has dealt with that is
 15 by entering what is called a sequestration order,
 16 which means that the witnesses are to not talk with
 17 each other or talk about their testimony after they
 18 come in and talk to me about what they know. Okay?
 19 A. Okay.
 20 Q. Why don't we start with just a summary of
 21 your education, background, training, things like
 22 that.
 23 A. Okay. Well, I have an undergraduate
 24 degree in social work and religion. I went to
 25 Phillips University. I grew up the son of a teacher

9	<p>1 and a social worker, so I kind of followed in both of 2 their footsteps. I went to Phillips University, which 3 is in Enid, Oklahoma, and got my degree, then my 4 undergraduate degree there.</p> <p>5 And then my first official job in mental 6 health was -- I worked at a psychiatric hospital in 7 Enid, Oklahoma. It was called Middle Lake Hospital, 8 and it was children, adolescents, and adults, 9 actually, at the time. I started working there when I 10 was 18, my freshman year in college, and basically 11 I've been interested in social work and education in 12 some form since then. I did my -- my undergraduate 13 kind of thesis paper was on elementary students' 14 exposure to violence on TV. So that's kind of where I 15 first started getting interested, and I did a lot of 16 summer camps through my church bringing kids from 17 inner city Denver to the mountains for summer camps.</p> <p>18 And then after undergraduate, I went to 19 graduate school at Washington University in St. Louis, 20 MSW program, social work and, you know, I grew up with 21 the stories of my dad who was a social worker in 22 Chicago in the '60s. So I wanted to get an urban 23 experience, so I went to St. Louis and was in the 24 social work school there and did my internship in east 25 St. Louis and north St. Louis, working with kids in</p>	11	<p>1 eventually became the chief program officer. So I 2 oversaw all of the clinical programming, including the 3 residential, the day treatment, the in-home services, 4 and the school.</p> <p>5 And then after that is when I got hired 6 by Littleton Public Schools, and initially I was hired 7 as a mental health specialist to come in and kind of 8 help look at mental health programming. We had done a 9 lot of consulting with Littleton Public Schools 10 through the Tennyson Center, so I had some 11 relationships there and made that decision to come 12 work for LPS and then --</p> <p>13 Q. And that was in '05? 14 A. No, that was in '08.</p> <p>15 Q. Oh, '08 is when you -- 16 A. Started working with LPS.</p> <p>17 Q. Started working at LPS? 18 A. Correct. And the first year I was a 19 mental health specialist kind of on special projects 20 and working only supporting pretty intensive needs 21 kids. And then the following year, I moved into an 22 administrative role here as a coordinator of student 23 support services, and that -- primarily overseeing 24 mental health programming and intensive needs 25 programming for kids with emotional and behavioral</p>
10	<p>1 the projects doing educational advocacy. I also 2 worked as a crisis outreach worker as a part-time job. 3 So I worked after hours in police stations and helping 4 solve situations where kids were in crisis.</p> <p>5 And then I got my graduate degree there 6 in St. Louis, worked another year for an organization 7 there called Vision for Children at Risk working some 8 directly with kids, and then also doing some kind of 9 community collaborative policy work around children's 10 policy. And then I moved back to Denver in '98 and 11 started working at a nonprofit facility called Savio 12 House. And that's a treatment facility for adolescent 13 juvenile offenders and spent a few years there working 14 with pretty high-needs youth, who were in the 15 delinquency system, as a family therapist and group 16 therapist and basically working on a multisystemic 17 therapy treatment model and some other models for 18 helping kids.</p> <p>19 And then after that, I got hired at the 20 Tennyson Center for Children, which is another 21 nonprofit treatment center. And I started out there 22 as a program manager managing programs in schools, day 23 treatment programs, school-based programs, and 24 in-home, intensive in-home programs. And then 25 eventually I was there for about seven years and</p>	12	<p>1 issues, as well as the threat and suicide piece, 2 crisis response team. And then a year ago this past 3 fall is when I was moved into the position of director 4 of social, emotional, and behavior services. So I've 5 been in that position since last fall, 2014 -- or, I 6 guess, July of 2014.</p> <p>7 Q. So July of '14, you were the director 8 of -- 9 A. Social, emotional, and behavioral 10 services.</p> <p>11 Q. Sorry, I know it's a long title. What 12 was your title immediately before that title at LPS? 13 A. The coordinator of student support 14 services.</p> <p>15 Q. Okay. Now, in -- thank you for that. 16 One question, obviously there's lots of them, but one 17 question I had is, when you were working at Savio 18 House -- 19 A. Uh-huh.</p> <p>20 Q. -- as a therapist, that was in Missouri? 21 A. No, that was here in Colorado.</p> <p>22 Q. Oh, in Denver? 23 A. Here in Denver, yeah.</p> <p>24 Q. And that was not a school-based program? 25 A. No, it's a nonprofit treatment center.</p>

13

1 So it's residential day programming and in-home
 2 services.
 3 **Q. Okay. And then the Tennyson Center, you**
 4 **mentioned that there were some school-based programs,**
 5 **help me understand what those were.**
 6 A. So the Tennyson Center is similar to
 7 Savio in that they're private nonprofits that have
 8 their own program and have their own school. So kids
 9 do go to school there, the kids who live there, as
 10 well as kids from the community who are in day
 11 treatment programs.
 12 But then at Tennyson Center, a big part
 13 of my job was outreach to school districts. So part
 14 of my job was -- we had some programs that we helped
 15 schools start. So at the time I got there, there was
 16 four programs in different school districts around the
 17 state. One was in Limon, Colorado. One was in Brush,
 18 Colorado. A couple were here in the metro area. One
 19 was Littleton that were day-treatment programs where
 20 we helped the school district figure out how to
 21 develop a program for kids with significant emotional
 22 and behavioral needs and mental health issues.
 23 **Q. Okay. And what kind of programs were you**
 24 **offering to Limon and Brush and Littleton for the kids**
 25 **with the significant emotional and behavioral issues?**

14

1 A. Well, the programs were licensed day
 2 treatment programs, those four programs. We had a
 3 number of different programs that we offered. One of
 4 them was helping to start these day treatment
 5 programs. They're basically designed for 10 to 12
 6 students in one classroom with a teacher, a mental
 7 health therapist, and two paraprofessionals. And we
 8 help support and hire and train -- in some of those
 9 programs, the Tennyson center, those were all Tennyson
 10 Center employees, and other programs they were part
 11 school district employees, part Tennyson employees,
 12 but it was kind of a collaborative model.
 13 **Q. Okay. And these day treatment programs**
 14 **that you're describing, what did they -- what kind of**
 15 **services did they provide to the students who were**
 16 **participating in them?**
 17 A. Well, they included an educational
 18 component. They also included individual, group, and
 19 family therapy. As a part of that, to have a day
 20 treatment license through the Department of Human
 21 Services at the state, you have to have some pieces of
 22 those -- each of those components. So you offer a
 23 range of individual, group, and family therapy
 24 services, as well as the educational piece in case
 25 management.

15

1 **Q. Okay. And what were the types of**
 2 **emotional or behavioral problems that -- let me strike**
 3 **that.**
 4 **What I'm trying to get at is what kind of**
 5 **kids were these programs targeted at?**
 6 A. In general, there are students who have
 7 had significant behavioral issues who struggle to be
 8 managed in the normal school environment. We're
 9 talking kids who most -- I think all of which
 10 qualified for those programs were on an IEP, typically
 11 for an emotional disability and had had significant
 12 behavior problems. Some of them had been in
 13 residential centers and were coming back out and
 14 trying to integrate back into the schools. Some of
 15 them were ones that schools had dealt with for a long
 16 time and were really struggling to manage them safely,
 17 and so they needed a higher level program.
 18 **Q. But are we talking about, for instance,**
 19 **kids who are on the autism spectrum? Are we talking**
 20 **about kids who have drug and alcohol issues, physical**
 21 **or sexual abuse backgrounds, or all of the above?**
 22 A. Could be all of those. We had kids with
 23 all of those criteria. I think the main criteria was
 24 that they had enough struggles with their emotional
 25 regulation, behavioral control, family mental health

16

1 issues, that they needed intensive therapeutic
 2 services to go with their education.
 3 **Q. Okay. And how was, for instance,**
 4 **Littleton Public Schools evaluating whether or not a**
 5 **student fit the criteria for these day treatment**
 6 **programs that you're describing, if you know?**
 7 A. Well, at the time, and, again, I'm
 8 speaking back to when I was working at the Tennyson
 9 Center, working with these school districts, each of
 10 the school districts had their own process for how
 11 they would determine when to make a referral. That
 12 usually related to the student's IEP team decision.
 13 So if an IEP team decides, Hey, this kid needs a much
 14 higher level of services, then the administrator from
 15 the school district would make a referral to one --
 16 because these were privately run day treatment
 17 programs. So they're technically operated under the
 18 license of the nonprofit, in this case, the Tennyson
 19 Center.
 20 **Q. And were the day treatment programs --**
 21 **were they physically -- were these kids who were part**
 22 **of these programs, were they attending -- were they**
 23 **physically present at a Littleton school, or were they**
 24 **going somewhere else?**
 25 A. Correct. So the Tennyson Center had

17

1 programming on its campus, but these programs were
 2 designed -- they were created because they were
 3 designed with schools to be located in the school. So
 4 the whole goal was to keep kids from having to leave
 5 their home school district and go to downtown Denver
 6 to a school, so Limon, Brush, Littleton, and Cherry
 7 Creek at the time.
 8 **Q. Okay. And does LPS still have those day**
 9 **treatment programs available to its students?**
 10 A. Well, LPS still uses -- the elementary
 11 day treatment program that was at Hopkins Elementary
 12 at the time I worked with it, has moved -- it's still
 13 a part of our referral base, but it's now located at
 14 Englewood, Clayton Elementary in Englewood School
 15 District. Littleton, Sheridan, and Englewood always
 16 have referred kids to that program. So due to some
 17 space constraints, it's now in Englewood. But then
 18 Littleton also, at the time I was working at the
 19 Tennyson Center, developed two other programs at the
 20 middle and high school level that we can also refer
 21 kids to.
 22 **Q. And are those part of -- are the kids who**
 23 **are referred in that fashion, are they referred to a**
 24 **school in the Littleton system or in some other school**
 25 **district?**

18

1 A. Which kids?
 2 **Q. The middle and high school kids that**
 3 **you're describing.**
 4 A. They can be either one. So we still have
 5 the option of referring kids to outside private
 6 facility schools, so Tennyson Center, Savio House.
 7 There's many of those that are still around. So we
 8 can send them out of the district, but we also do have
 9 two programs now in the district that are designed for
 10 students with disabilities with high behavioral needs,
 11 and that's the ones at Goddard Middle School and
 12 Heritage High School.
 13 **Q. Okay. Oh, one housekeeping -- do you**
 14 **hold any professional licenses?**
 15 A. Uh-huh. Clinical social worker.
 16 **Q. Okay. So you're an LCSW?**
 17 A. And I also have a principal's license,
 18 Colorado school principal's license, and then I have a
 19 Colorado school social worker license as well.
 20 **Q. Can you tell me what is a principal's**
 21 **license and why do you have one?**
 22 A. Well, in Colorado, to be a school
 23 administrator and serve some of those duties,
 24 including evaluating staff and those things, you have
 25 to have some type of administrator's license. There's

19

1 school principal and school administrator. And so in
 2 Littleton, our expectation is if you're going to be an
 3 administrator, you need to have one of those licenses
 4 if you're working in the instructional side of things.
 5 So I have one as -- I had one as -- I had a school
 6 social worker's license first, and then added the
 7 school principal --
 8 **Q. Okay.**
 9 A. -- when I came to work in Littleton.
 10 **Q. Got it. Now, let's talk about your**
 11 **tenure with Littleton Public Schools. When you**
 12 **started, you said your title was a mental health**
 13 **specialist?**
 14 A. Mental health professional or mental
 15 health specialist, yeah.
 16 **Q. And what were your job responsibilities**
 17 **as a mental health professional or specialist with**
 18 **LPS?**
 19 A. That first year I was brought in mainly
 20 to focus on helping support students with significant
 21 needs. I worked a lot with our positive behavior
 22 support initiative, which is trying to help schools
 23 develop their system for intervention, supports, and
 24 systems for students around social skills and
 25 behavior. So we did a lot of work with principals and

20

1 their building teams to develop what they're doing in
 2 their buildings. I acted as a consultant on a lot of
 3 specific intensive cases with students and families.
 4 A lot of working with families to connect to mental
 5 health resources, and then also assisted in kind of
 6 working on our procedures for mental health crisis
 7 situations.
 8 **Q. And when you said that you were working**
 9 **with the schools on -- I think your phrase was,**
 10 **intensive need cases?**
 11 A. Uh-huh.
 12 **Q. First off, did I get that right?**
 13 A. Yeah. I mean, just a general term. Kids
 14 that have intensive needs or having significant
 15 struggles.
 16 **Q. Okay. And how would those intensive need**
 17 **cases or the kids with those significant struggles**
 18 **come to your attention?**
 19 A. Typically, one of a couple ways. One
 20 would be that an administrator, either a principal or
 21 a special ed administrator would refer that to me, and
 22 then occasionally we also had, as a part of our
 23 behavior, positive behavior initiative, those teams at
 24 each school would sometimes identify students that
 25 they were struggling with and bring those to me as a

21

1 part of their -- I was their coach for that process.
 2 So I would coach them on building their behavior
 3 system. And so as a part of that process, sometimes
 4 we would meet and talk over cases.
 5 **Q. Did that generally involve students who**
 6 **had a disability of some sort?**
 7 A. It was a mixture. I would say the
 8 majority of them were kids with disabilities at that
 9 time --
 10 **Q. Okay.**
 11 A. -- but not all.
 12 **Q. Would you get brought in as a mental**
 13 **health specialist or a mental health professional at**
 14 **that time on threat assessments?**
 15 A. Yeah, I did participate in a couple
 16 threat assessments, I believe, that first year.
 17 **Q. And going back to your days as a mental**
 18 **health specialist or professional within LPS, do you**
 19 **know what would prompt you to become involved in a**
 20 **threat assessment?**
 21 A. Well, if you're speaking back to that
 22 first year, so that was '08-'09 school year, that was
 23 the year that LPS really started to formalize this
 24 stuff. So it was that year, my first year, that it
 25 really became a more formal procedure and formal

22

1 training started happening. So in that first year, it
 2 would be more something like, you know, We're
 3 concerned about this kid, who do we have that can help
 4 support this team, figure out what to do. I would
 5 frequently be called in, you know, Hey, Nate, I want
 6 you to go over and help this team out, this kid is
 7 having significant struggles. And in some of those
 8 cases, they were worried about a threat issue, and
 9 other cases it was maybe suicide or behavioral -- you
 10 know, a younger child with behavioral concerns, out of
 11 control.
 12 **Q. Okay. And then when you became the**
 13 **director of student service -- or coordinator of**
 14 **student services?**
 15 A. Student support services.
 16 **Q. I'm sorry. Let me start that over. What**
 17 **were your job responsibilities when you became the**
 18 **coordinator of student support services?**
 19 A. Well, then I became the supervisor for a
 20 couple of different programs. One was oversight of
 21 the district behavior support team and consultation
 22 team. I also then became the direct administrator
 23 overseeing those two programs I mentioned earlier, the
 24 program at Goddard Middle School and the program at
 25 Heritage, those intensive needs programs.

23

1 So I supervised those two programs, which
 2 I had had familiarity with because I worked to help
 3 start those when I was outside of the district. I
 4 also oversaw some other miscellaneous programs with
 5 kids with disabilities like our visually impaired
 6 program. I also became the leader for the crisis
 7 response and a health crisis response team, and then
 8 began oversight of the threat assessment and suicide
 9 intervention procedures as well, probably some other
 10 duties in there, but I'm not recalling at this point.
 11 But those were the big ones.
 12 **Q. Okay.**
 13 A. Oh, section 504 --
 14 **Q. The IEP's?**
 15 A. -- the accomodation plans. Yeah, we had
 16 special ed coordinators for each level that were the
 17 primary administrators for that, but the section 504
 18 impairments and disabilities, I was in charge of that
 19 process.
 20 **Q. Okay. All right. And as the coordinator**
 21 **of student support services, were you still involved**
 22 **in connecting families to mental health resources as**
 23 **you felt they needed?**
 24 A. Yes. But I think probably became more of
 25 a role of also supporting all of the mental health

24

1 staff, the counselors, psychs, and social workers in
 2 terms of how do we do that well and how can we support
 3 them. But, yes, still involved in a lot of difficult
 4 cases and working closely with our mental health
 5 agency and the community.
 6 **Q. Right. And I'm not -- I don't mean to**
 7 **suggest that you were the primary person responsible**
 8 **for making the connections between families and the**
 9 **mental health resources that were available to help**
 10 **their students. I assume that was also something that**
 11 **you expected your in-school mental health**
 12 **professionals to do, correct?**
 13 A. I would say it was -- yeah, it was a
 14 general expectation that people knew how to do that,
 15 how to access -- help families access mental health
 16 resources, yeah.
 17 **Q. Can you tell me generally what Littleton**
 18 **Public Schools did to make sure that it's in-building**
 19 **mental health professionals knew what resources were**
 20 **available so that when they had to make that**
 21 **connection between a family and a mental health**
 22 **resource, they knew what to do?**
 23 A. Sure. Are you just speaking about just
 24 at all or at that time and place or --
 25 **Q. Generally. I mean --**

25

1 A. Just in general?

2 **Q. -- so we can talk about the time period**

3 **prior to the shooting, and then we'll talk as well**

4 **about the time period subsequent to it.**

5 A. Well, one of the things we've always done

6 is we -- at minimum, annually we bring in our folks

7 from the Arapahoe/Douglas Mental Health Center, which

8 is our local mental health center, human services,

9 sometimes some other nonprofit agencies. And they

10 have spoken to our mental health staff in terms of,

11 Here's the services we offer, here is how you connect

12 them. So that's been pretty much an annual

13 occurrence.

14 And then the other thing that we did that

15 has been a pretty intentional focus is we built an

16 online resource library. So basically what that was

17 is a place where our mental health staff can go that

18 has -- by topic, you click on there, and it has

19 resources and Web sites and referral forms, those kind

20 of things. So we've had that as a resource guide for

21 our staff, and then we've also worked collaboratively

22 with our local mental health center to come up with

23 some specific opportunities for staff to get families

24 in more quickly. So, for example, we worked with

25 Arapahoe/Douglas Mental Health to figure out a way to

26

1 have an open walk-in and intake process in the morning

2 so that families wouldn't have to wait three or four

3 weeks. So they would come talk to our staff, and we

4 kind of developed a way for us to help families get in

5 more quickly.

6 **Q. Okay.**

7 A. So those are kind of the type of

8 activities.

9 **Q. And did LPS provide its counselors and**

10 **school psychologists with training on when a referral**

11 **to Arapahoe/Douglas Mental Health or some other**

12 **outside resource ought to be made?**

13 A. I mean, I don't think we had a training

14 module or something like that that said, you know,

15 Here is when you make a referral. I think we

16 certainly have a lot of conversations with people. We

17 have monthly meetings where we sit down and go over

18 cases and, you know, provide professional case

19 consultation and feedback, but we didn't have a formal

20 training. It was a part of what everybody knew was an

21 expectation of their job.

22 And then each school has their own -- did

23 have an expectation to have their own student review

24 process, or as we call it, a student intervention

25 process, which is a team in the school that looks at,

27

1 you know, kids who are struggling, either academically

2 or socially and, you know, it comes up with

3 intervention ideas for that student.

4 **Q. Okay. And that was called the student --**

5 A. Student intervention team.

6 **Q. -- intervention team?**

7 A. Right.

8 **Q. Who was on the student intervention team**

9 **at Arapahoe High School in 2013?**

10 A. You know, I couldn't answer that question

11 back to 2013.

12 **Q. Do you know -- can you tell me who was on**

13 **the student intervention team at Arapahoe High School**

14 **for this school year?**

15 A. You know, I don't have the -- I couldn't

16 tell you their full roster. Typically in a school, it

17 would involve at least one of their mental health

18 staff, typically a psychologist. There would be a

19 teacher or two on that team, an administrator or two.

20 A lot of times that student intervention team can be

21 fluid, depending on who the student is. So sometimes

22 schools will design a process where they bring

23 together the right people for that student, and then

24 other schools have a set team that meets every month.

25 **Q. Okay. Do you know whether or not**

28

1 **Arapahoe High School has a set team for its student**

2 **intervention team or a more fluid team?**

3 A. Right now?

4 **Q. Yes.**

5 A. I don't know.

6 **Q. Do you know whether there was a student**

7 **intervention team in place at Arapahoe High School in**

8 **2013?**

9 A. Not off the top of my head. I can't --

10 without probably looking at some documents, I couldn't

11 tell you.

12 **Q. Sure. And the reason I'm asking is**

13 **that's the -- you are the first person I've heard**

14 **mention the existence of a student intervention team.**

15 **So what I'm trying to get at is, was there one at**

16 **Arapahoe, and what does that team do?**

17 A. Yeah, I -- to the best of my

18 recollection, I do remember Arapahoe had a pretty

19 vigorous process for identifying students who were

20 struggling, and I do remember when we had some

21 district trainings around student intervention team

22 process. They did present some information on their

23 process related to kids who were struggling

24 academically. I don't know specifically at that time

25 what they were doing related to the behavioral. The

29

1 student intervention team process was initiated and
 2 started related to learning needs. So it was designed
 3 to really -- how to get early intervention with kids
 4 who were struggling academically, and then through
 5 time we've expanded it to really also focus on kids
 6 who were struggling with solely behavioral and
 7 emotional needs.

8 **Q. Do you know -- setting aside who was on**
 9 **the team, you mentioned that Arapahoe had a pretty**
 10 **rigorous system to identify students who were**
 11 **struggling back in the 2013 time frame. What can you**
 12 **tell me about what that process or system was to**
 13 **identify kids who were struggling?**

14 A. Well, I don't think I said it was
 15 rigorous. I don't know enough about it to say it was
 16 rigorous. But I guess what I would say is what I
 17 recall about their student intervention team prior to
 18 2013 was that we had a couple district trainings where
 19 each building sent people to talk about this process
 20 and how they were developing that in their building.
 21 And Arapahoe did some presentations on how they were
 22 doing that. Giving some examples, what I recall is
 23 that the examples I heard were related specifically to
 24 academics, and that's why I can't recall them speaking
 25 about behavioral at that time. So I can't tell you if

30

1 they were doing it for behavioral needs at that time
 2 or not.

3 **Q. All right. But do the schools in the LPS**
 4 **district now include behavioral struggles in the**
 5 **student intervention team process?**

6 A. Yes.

7 **Q. And tell me as best as you can how**
 8 **students who were struggling, either academically or**
 9 **behaviorally, are identified and brought into student**
 10 **intervention team process.**

11 A. Well, typically it would be either by
 12 referral of a teacher or counselor or somebody else
 13 who has had significant challenges or is significantly
 14 concerned about a student would make a referral. So
 15 each school has the ability to figure out what that
 16 referral process looks like. There are some state and
 17 federal guidelines around trying interventions with
 18 students before you can qualify them for an IEP,
 19 specifically academically there. And so part of that
 20 process is if a teacher says, Hey, I'm really worried
 21 about this kid, they're not progressing academically
 22 or -- then they can make a referral, and the team can
 23 look at that and try some interventions. And then if
 24 that doesn't work, then they might proceed to a
 25 special education evaluation.

31

1 **Q. All right. And once a student is brought**
 2 **to the attention of one of these student intervention**
 3 **teams, what happens? Explain how that process works.**

4 A. Well, the school has some ability to
 5 choose how that process looks, but, essentially, it
 6 can be one of two ways. Either the team reviews kind
 7 of the student's information and you suggest some
 8 interventions back to that teacher or whoever the case
 9 manager might be. In other cases, some schools do
 10 occasionally bring the family in to look at that and
 11 ask for their ideas about, you know, how can we help
 12 your student improve. And then basically those
 13 recommendations are given back and kind of assigned
 14 out for someone to follow up on.

15 **Q. Okay. Do you know whether Karl Pierson**
 16 **was ever the subject of any discussion or**
 17 **participation in this student intervention team**
 18 **process?**

19 A. No, I don't know. I don't know if he was
 20 part of those discussions or not.

21 **Q. Okay. And one of the reasons I ask is**
 22 **obviously we all know now that Karl had had**
 23 **significant behavioral issues prior to December of**
 24 **2013, correct?**

25 A. Well, I don't know -- I don't know if I

32

1 would characterize them as significant. I think
 2 that's part of the challenge is a lot of times the
 3 students who would come to a student intervention team
 4 process for behavioral concerns would be at a higher
 5 level than what I think we saw from him up to that
 6 point. And so it's hard to predict -- you know,
 7 certainly a teacher, if they were concerned enough
 8 about him, could have made a referral, but typically
 9 we're talking about kids who are at a point where
 10 they're close to failing out of school or they're
 11 behaviorally unmanageable a good amount of the time.

12 **Q. Okay. Well --**

13 A. So I think that's -- yeah.

14 **Q. And the reason I say that is I'm looking**
 15 **at the threat assessment that was performed by Kevin**
 16 **Kolasa and Esther Song on Karl Pierson, and among**
 17 **other things, they noted that Karl had a significant**
 18 **history of violent behavior towards others. So that's**
 19 **one of the reasons that I used the term he had a**
 20 **significant history of behavioral problems. Do you**
 21 **disagree with the conclusion that Dr. Song and**
 22 **Mr. Kolasa laid out with respect to his history of**
 23 **violence?**

24 A. I don't know enough about why that box
 25 was checked. I would say from my look at his

33

1 behavioral history, there's a lot of students in our
 2 school that had that amount of behavior and similar
 3 types of behavior to him. And so I don't know if I
 4 would characterize it as significant compared to -- I
 5 mean, certainly maybe compared to the general
 6 population. But when you look at the scale of kids
 7 who have behavioral outbursts and the amount that he
 8 had compared to other students, there certainly were
 9 many more students who had more frequent, more
 10 significant behaviors than he did.

11 **Q. Okay. And we also now know that at the**
 12 **time of the shooting, Karl's grades had, to put it**
 13 **bluntly, gone off a cliff. He had several F's,**
 14 **several D's. Do you know whether or not the decline**
 15 **in his grades in the fall semester of 2013 would have**
 16 **qualified him for the attention of the student**
 17 **intervention team?**

18 A. I can't speak, because I don't know what
 19 their referral criteria was at Arapahoe at that time
 20 or enough about their process. I would say, in
 21 general, in the district, yes, that would be enough to
 22 have a referral to that process.

23 **Q. Okay. Well, you were one of the people,**
 24 **if not the primary person, who was responsible for**
 25 **training these student intervention teams on when to**

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1 **intervene, correct?**

2 A. Not on student intervention teams, no.

3 **Q. Who trained the school-based teams on**
 4 **when to set in motion the student intervention team**
 5 **process?**

6 A. Well, the student intervention team
 7 process came largely out of the academic intervention.
 8 So it came out of our instructional department,
 9 because it initiated out of, what do you do with kids
 10 who are struggling academically, and kind of a federal
 11 and state push around a response to intervention,
 12 which is an approach to helping kids early on before
 13 they fail, and then have to be identified with a
 14 disability at a time when they're already failing. So
 15 that initiative came out of our instructional
 16 department. And then part of my role is to help
 17 assist and how do we apply that to behavior.

18 **Q. Okay. Well, can you tell me anything**
 19 **about how the LPS teachers were trained to know when**
 20 **to bring a student who was struggling, for any reason,**
 21 **to the attention of the student intervention team?**

22 A. Well, I would say there certainly was a
 23 lot of discussion with teachers at some of their
 24 instructional trainings, but that wasn't my -- it
 25 wasn't my area of oversight. So I could say that the

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1 expectation to my knowledge was that as each building
 2 administrative team set up whatever their process was,
 3 that then they also worked with their building
 4 leadership at the high school. It was probably their
 5 department chairs to come up with, okay, how are we
 6 going to make referrals, what does the process look
 7 like.

8 **Q. Okay. Can you give me a sense of what**
 9 **percentage of students who were referred to this**
 10 **student intervention team at LPS were either special**
 11 **ed students, academic performance problems, behavioral**
 12 **problems, suicide, violent behavior --**

13 A. Are you talking about --

14 **Q. -- drug and alcohol issues?**

15 A. -- ever or prior to 2013 or --

16 **Q. Well, let's start with, can you give me**
 17 **even a rough estimate of those numbers now?**

18 A. Now, no, I cannot off the top of my head.
 19 I probably have access to that somehow, but I don't --
 20 I guess what I would tell you is the vast majority of
 21 students who are referred are referred when we -- team
 22 suspect that they may qualify or be at risk of
 23 qualifying for an educational disability, whether it's
 24 academic or it's learning or it's autism or it's
 25 emotional.

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1 **Q. Okay. Is that -- does LPS track any**
 2 **statistics or information about who is referred to**
 3 **these student intervention teams and what is done with**
 4 **those students?**

5 A. I do recall a district committee kind of
 6 looking at the initial few years of that
 7 implementation and reviewing kind of what that looked
 8 like. I know that the heavy focus was on meeting some
 9 of the criteria related to special ed and that we had
 10 to try interventions before a student was qualified
 11 for special education and monitor that. But I know
 12 the focus was heavy on academics. I can't, off the
 13 top of my head, tell you, you know, numbers or
 14 percentages.

15 **Q. Okay. Now, you mentioned that in July of**
 16 **2014, you became the director of social, emotional,**
 17 **and behavioral services. Did I get that right?**

18 A. Correct.

19 **Q. Okay. Is that a newly created title or**
 20 **were you replacing someone?**

21 A. It's kind of both.

22 **Q. Okay.**

23 A. So the title is new. The position was
 24 previously -- the woman who was in it was the director
 25 of alternative education, and her role was to oversee

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1 discipline, as well as our alternative ed programs.
 2 And then when I moved into the role, it was changed.
 3 Basically the difference for me is I kept the mental
 4 health stuff I was doing. And then I also took over
 5 discipline, and then alternative went to some other
 6 folks.
 7 **Q. So in your current role as director of**
 8 **social, emotional, behavioral services, one of your**
 9 **new responsibilities is to oversee discipline**
 10 **districtwide?**
 11 A. Correct.
 12 **Q. So you would review suspension requests,**
 13 **expulsion requests --**
 14 A. Correct.
 15 **Q. -- those kind of things?**
 16 A. Correct.
 17 **Q. Am I correct that both before and after**
 18 **you took on that new title with its additional**
 19 **responsibilities, that you also kept your preexisting**
 20 **responsibilities for student support services and**
 21 **suicide assessments, threat assessments, those kinds**
 22 **of things?**
 23 A. Some of them. So I did retain oversight
 24 of the mental health, suicide, threat assessment,
 25 child abuse, juvenile sex offender management, the

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1 crisis team. But I did -- the person who assumed my
 2 old role, who now part of his job is reporting to me,
 3 oversees some other things like the special programs I
 4 had talked about, 504 plans --
 5 **Q. Sure.**
 6 A. -- those things. So I did keep most of
 7 -- about half of my job, I guess.
 8 **Q. Okay. Got it. And I get the sense from**
 9 **the documents that I've reviewed that a significant**
 10 **part of your job responsibility as the coordinator of**
 11 **student support services was to provide training on a**
 12 **variety of mental health issues to employees of LPS?**
 13 A. Yeah, that was part of my job for sure.
 14 **Q. Okay. And we're going to obviously get**
 15 **into some of that training, but, in addition to**
 16 **training LPS faculty and staff and other**
 17 **administrators on various mental health issues, did**
 18 **you also provide any training to the LPS students on**
 19 **mental health issues?**
 20 A. In certain situations, I did, yes.
 21 **Q. Let's -- I want to break down the**
 22 **training that you did to the different audiences that**
 23 **you addressed. What kind of training did you provide**
 24 **to the students on mental health issues?**
 25 MR. EVERALL: What time period are you

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1 talking about?
 2 **Q. (BY MR. ROCHE) Well, we can break it**
 3 **out. Again, in broad strokes, I'm talking about the**
 4 **time period before the shooting, and if things have**
 5 **changed since then, tell me what you're doing**
 6 **differently now.**
 7 A. Well, prior to 2013, there was not a set
 8 training that happened for every student in every
 9 school. So it wasn't like some of the other trainings
 10 that I do that are regular, structured, annual
 11 trainings. But I did a lot of work with schools and
 12 their positive behavior support programs. And so as a
 13 part of the programs, they have a building team that's
 14 really looking at how are we building that pyramid in
 15 our building of kind of support and instruction for
 16 all students, intervention for targeted groups, and
 17 the intensive interventions.
 18 And so part of that was helping them
 19 design and build what their systems would be. So
 20 there were times when I would support them and maybe
 21 be in a classroom talking with kids. There was times
 22 when it might be an all-school assembly. Those were
 23 school by school kind of formulas that that building
 24 team would come up with in terms of what they felt
 25 worked, and then also we did a few districtwide

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1 things.
 2 One of the big things we did -- and I
 3 can't remember now if it was fall of '11 or fall of
 4 '12. I think it was fall of '12. We did a huge cyber
 5 safety workshop where we brought teams of students and
 6 staff from each school, and talked about cyber climate
 7 issues and how to address those and how to support
 8 kids in your school who were struggling with those
 9 issues and -- so a lot of different kind of
 10 initiatives and events like that, as well as kind of
 11 working with schools to figure out, okay, what is your
 12 -- you know, what is your method for getting out to
 13 students information about reporting concerns.
 14 **Q. Okay.**
 15 A. Calling security, calling Safe2Tell. So
 16 kind of giving some consultation and support to those
 17 building teams.
 18 **Q. All right. That leads nicely into one of**
 19 **the topics I wanted to touch on, which is Safe2Tell.**
 20 **In the time period prior to December of 2013, what was**
 21 **LPS's policy on training students about the existence**
 22 **of Safe2Tell and how to use it?**
 23 A. Did you say what was our policy?
 24 **Q. Yes.**
 25 A. Well, we didn't have a policy at that

41

1 time. I don't believe we had a policy.
 2 **Q. What was the practice?**
 3 A. The practice, I think, at the time -- so
 4 certainly we did have an expectation that every school
 5 would have the Safe2Tell link on their Web site, on
 6 the front page of their Web site. And at the high
 7 school level the -- I would say the expected practice
 8 was that students were made aware. Typically it was
 9 at the beginning of the school year, you know, Here is
 10 the Safe2Tell reporting information. Some schools put
 11 that in student planners that they gave out, some put
 12 it on the back of student ID's. And a lot of schools,
 13 as part of their freshman orientation or link process
 14 where you're kind of doing that freshman mentoring
 15 process, would go over it at that time, not just
 16 Safe2Tell, but also how do you support someone who may
 17 be suicidal, what we call kind of a yellow ribbon of
 18 concern.
 19 And so there wasn't a standard policy at
 20 that time, but we certainly promoted that very
 21 heavily. And then obviously every October is Safe
 22 Schools Month. And so as part of that month, we also
 23 worked with schools and sent out each year some
 24 suggested activities in terms of promoting safe
 25 schools and kids knowing what to watch for and how to

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1 report.
 2 **Q. Okay. And I understand that there were**
 3 **links on the Web site and some schools put it on their**
 4 **student ID's and some schools put posters in the**
 5 **cafeteria. But did LPS during the pre-2013 time frame**
 6 **have a practice of engaging the students in any**
 7 **particular type of training on Safe2Tell as opposed to**
 8 **just telling the kids, Hey, this is out there?**
 9 A. I would say we didn't have a standard
 10 training. You know, we didn't have like a standard
 11 PowerPoint that we gave to kids, but we -- I feel very
 12 confident that our schools were getting that word out,
 13 and I think part of my confidence is we were getting
 14 calls. We got Safe2Tell calls. We still do on a
 15 regular basis. But there wasn't a standard, you know,
 16 kind of practice. And I would say each school did
 17 that a little bit differently in terms of whether it
 18 was part of a small orientation, freshman orientation
 19 group, or it was part of a, you know, welcome to high
 20 school assembly with students and parents or, you
 21 know, another format.
 22 **Q. Okay. Does LPS maintain or track any**
 23 **statistics on how many Safe2Tell calls its students**
 24 **make or are made about its students in a given year?**
 25 A. Yes, we have those numbers.

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1 **Q. Okay. Can you give me even a range of**
 2 **how many calls come in on Safe2Tell that involve LPS**
 3 **students in some form or fashion in a given year?**
 4 A. So currently or --
 5 **Q. Well, let's -- yes, tell me currently,**
 6 **and then we'll work back.**
 7 A. I mean, I can't pull out years and years
 8 worth of data, but I would say on average now we get
 9 two or three a week. And some weeks, less than that.
 10 And obviously a little bit less when school is not in
 11 session. So, you know, I can't quote the hard numbers
 12 off of the top of my head, but, you know, I think
 13 there's -- it would range in the last three or four
 14 years probably -- and, again, I'm just off the top of
 15 my head, range between 40 and a hundred a year, maybe
 16 more on some years. But I do know, because I get
 17 copied on all of them, that we do some weeks have as
 18 many as three or four in one week.
 19 **Q. All right. And obviously one of the**
 20 **reasons I'm asking the question is in this case we**
 21 **know that there were a number of students who knew**
 22 **that Karl Pierson had bought a gun and had either seen**
 23 **the gun, seen pictures of the gun, heard him talking**
 24 **about the gun, and there were no Safe2Tell calls**
 25 **received about Karl Pierson and the fact that he**

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1 **bought a gun. Does that raise any concerns in your**
 2 **mind that perhaps more robust training ought to be**
 3 **provided on Safe2Tell and other similar resources to**
 4 **the students at LPS?**
 5 A. I guess what I would say about that is I
 6 think in all of the documents I reviewed, the reason
 7 for that is kids weren't surprised that he had a gun,
 8 and I think that's because a lot of his friends knew
 9 he shot guns. I think -- you know, one of the things
 10 I read was his chess coach, who saw him the Wednesday
 11 before, talked to him about the shotgun and was not
 12 alarmed enough to say anything to anyone.
 13 And to me, that tells me that people
 14 weren't concerned that Karl had a gun. And in most
 15 cases, my experience is that if people are concerned
 16 about someone, and then they acquire a weapon, that is
 17 a report. But in this case, for whatever reason,
 18 those people knew about that, didn't feel concerned
 19 enough to make that call. And I don't necessarily
 20 think it's because they didn't know about Safe2Tell.
 21 I think it's because they didn't have enough concern
 22 that either they didn't have all of the pieces of the
 23 picture to go, Wow, this is scary. But, again, that's
 24 -- I mean, that's just based on my after review of
 25 stuff.

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1 **Q. Got it. Does LPS do anything -- strike**
 2 **that.**
 3 **Has LPS changed anything about whether or**
 4 **how it trains or promotes Safe2Tell to students since**
 5 **the shooting?**
 6 A. I don't know if I would say specific to
 7 Safe2Tell. I mean, we encourage kids -- you know, one
 8 of the hallmarks of this is you want more than one way
 9 for kids to report. There's some kids who Safe2Tell
 10 is great. There are other kids who never call that
 11 hotline because they're too worried that their name
 12 will be used, even if it says it's anonymous, or
 13 they're just afraid to do that.
 14 So we promote Safe2Tell, but we also
 15 promote our 24-hour security department. We also
 16 promote talking to an adult you trust in the school.
 17 And certainly this year, one of the things we said to
 18 every school is it's an expectation that during the
 19 Safe Schools Month that you, again, review with all
 20 your students, all of your staff, all your community,
 21 including coaches and those folks, review what those
 22 warning signs are and how to report those.
 23 I think through the years there's been
 24 different programs, and Arapahoe is an example -- you
 25 know, there was a significant suicide issue with two

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1 close suicides in 2010 at Arapahoe, and we did some
 2 major work with them around, you know, how do you help
 3 kids being aware of warning signs. We had a whole You
 4 Matter campaign at that time, and, you know, brought
 5 in like 575 parents at a parent workshop that year to
 6 talk about, you know, how do we help kids.
 7 And so one of the challenges of this is
 8 that I think, as most people know for kids, these
 9 things go up and down. And there are times when kids
 10 will think about this right away. They'll remember
 11 it, Oh, yeah, I need to tell someone about this. And
 12 there are other times when they get caught up in the
 13 issues that their friend is having, and they don't
 14 think about it. And I don't necessarily think it's
 15 because they don't know that those options are out
 16 there, it's because, one, they may be worried to
 17 betray their friend. They may be worried that their
 18 friend may be put in the hospital or something else.
 19 So it's a constant thing to try to figure out what are
 20 ways to help kids remember that and so I -- you know,
 21 we don't have an expectation that you do just one
 22 standard PowerPoint and say Safe2Tell.
 23 **Q. Okay. And all of that would suggest to**
 24 **me that annual training on Safe2Tell might help**
 25 **sensitize those kids and put it towards the front of**

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1 **their mind that Safe2Tell and these other resources**
 2 **are available to them.**
 3 A. Uh-huh.
 4 **Q. Is LPS doing annual training on not just**
 5 **Safe2Tell, but the other resources that you just**
 6 **described now?**
 7 A. I guess that depends on how you define
 8 "training." I mean, I think -- to me, I kind of
 9 define training as when you have some kind of standard
 10 package. You know, here is the teaching points that
 11 you're going to go through specifically, like seven or
 12 ten teaching points. We don't have that. We do have
 13 the expectation that building leadership teams get
 14 that information out to students and integrate it as
 15 part of what they do.
 16 And I think one of the major ways that
 17 they do that, especially at our high schools and
 18 middle schools, is that they talk about that regularly
 19 in their faculty and staff meetings in terms of, you
 20 know, if you're concerned about a kid, if you see
 21 these things, here is what you do about it. In terms
 22 of the kid side of it, there are some schools who, as
 23 part of their positive behavior program -- so, for
 24 example, if they have a homeroom or an advisement
 25 period, which is usually like a once a month or every

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1 other week kind of thing where they have a homeroom, a
 2 lot of schools have integrated that as part of that
 3 curriculum. So they may have a curriculum where the
 4 teacher in their homeroom with their homeroom group
 5 says, Hey, you guys, let's remember -- they may talk
 6 about bullying, they may talk about suicide, talk
 7 about how to report concerns. So some of them have
 8 built that in as part of teaching.
 9 **Q. Do you know whether Arapahoe has done**
 10 **that?**
 11 A. I don't know. I think -- I know they
 12 haven't had an advisement or homeroom period, so I
 13 would guess that they haven't had that -- you know,
 14 that structured time to do it at. I know that they
 15 have done some things in other ways, and I know
 16 they're getting ready to start advisement very soon.
 17 That's a new thing that's coming.
 18 **Q. Okay. And you mentioned, or rather you**
 19 **started your answer off, it's an expectation that the**
 20 **schools will promote those programs?**
 21 A. Right.
 22 **Q. How does the district determine whether**
 23 **or not the schools are -- the building leadership are**
 24 **fulfilling that expectation that the district has?**
 25 A. Well, I'd say, you know, through the

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1 years it's gotten more specific, but I would say, you
 2 know, we don't have a -- we don't have a -- kind of an
 3 accountability, you know, something written that you
 4 turn in saying, Hey, here is how I did it. We are
 5 working on something right now that's a way for
 6 schools to kind of track, in general, who in your
 7 building is trained, and what are the ways that you're
 8 doing some of these things. So it's kind of a
 9 guidance worksheet for buildings.

10 The only way that would come close to
 11 that would be with our schools that are implementing
 12 that positive behavior support model, there is a
 13 process where we look at fidelity to that model. And
 14 so as a part of that process, our behavior coaches
 15 would go into schools and do kind of an interview with
 16 students and staff and find out, you know, What do you
 17 know, and, you know, what would -- you know, what do
 18 you do, and what are the expectations. And that's
 19 kind of the tool that allows them to look at your
 20 fidelity to that model, that positive behavior support
 21 model, and then it's feedback to the building
 22 administrator and team. So that's probably the
 23 closest we would have that comes to that.

24 **Q. And that goes right to one of the things**
 25 **I wanted to get at which is, does the district -- has**

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1 **the district done anything along the lines of what you**
 2 **just described with respect to the Safe2Tell program,**
 3 **that is, go and interview students at a particular**
 4 **building and say, What do you know about Safe2Tell, do**
 5 **you know anybody who has used it, do you know when**
 6 **it's appropriate to use it? Is anybody reaching out**
 7 **to the kids to find out if the training, whatever**
 8 **they're getting, is actually sinking in?**

9 A. No, we're not doing that at this point.
 10 Other than, I guess I would say, informally. So if
 11 I'm in a school -- I'm in schools frequently, I may be
 12 talking to kids, but not in a structured way.

13 **Q. Okay. Wouldn't it be helpful to validate**
 14 **how effective that training is by doing something**
 15 **along those lines?**

16 A. Well, again, I wouldn't consider it
 17 training, what's going on now. I would consider it
 18 awareness building, and, you know, maybe in some cases
 19 there's some -- there's some instructional side of it
 20 in those advisory times, but, again, I think I try to
 21 consider it in a big picture, which is -- you know,
 22 Safe2Tell is one aspect in one venue, and so how do we
 23 integrate that into kind of a bigger picture of
 24 concerns. And that's where some of our training --
 25 try to broaden it to say, you know, we need to be

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1 aware of kids who may be getting abused. We need to
 2 be aware of other safety and danger issues, and so how
 3 do we -- I think that's one of the challenges for
 4 schools is how do we take all of those issues, in
 5 terms of danger and protection and support for kids
 6 and help our staff and our students know how to react.
 7 So I think that's certainly one of the areas I'm
 8 always interested in trying to figure out how to do
 9 better.

10 **Q. Does Littleton train its faculty and**
 11 **staff and administrators using the online training**
 12 **materials that are available from Safe2Tell?**

13 A. Some of them do. Again, we don't do it
 14 in a structured way. A number of our -- I mean, we
 15 always refer to those materials, the posters as well
 16 as the online videos and curriculum. There's some
 17 classroom curriculum and things like that. So we
 18 always remind our schools that those are available,
 19 but we don't have a mandated or structured way of
 20 doing that for all staff.

21 **Q. Okay. Now, you mentioned that you are**
 22 **responsible for overseeing discipline in LPS, right?**

23 A. Correct. I mean, ultimately in a school
 24 district, the board of education.

25 **Q. Understood.**

52

1 A. But, yes.

2 **Q. But my -- what I'm trying to get at is do**
 3 **you review every suspension request and every**
 4 **expulsion request within the district?**

5 A. Correct.

6 **Q. Okay. And that includes things as minor**
 7 **as a one-day suspension for cursing in a classroom?**

8 A. Correct. I review those. Principals
 9 have the authority to make suspensions, but I do have
 10 an oversight and review process with those, yes.

11 **Q. And my question is, do you review all of**
 12 **them for the entire district?**

13 A. Yes.

14 **Q. Okay. Prior to 2013, you did not review**
 15 **all of the threat assessments that were done, correct?**

16 A. No, I did.

17 **Q. You did review every threat assessment**
 18 **that was performed at the school?**

19 A. Correct. Correct.

20 **Q. I guess I'm a little confused, because**
 21 **when I look at -- and you're welcome to look at**
 22 **Exhibit 35, which is the threat assessment that was**
 23 **done on Karl Pierson. And it's in this book if you**
 24 **want to look at it.**

25 A. Do you know what --

53

1 **Q. 35.**
 2 A. Oh.
 3 **Q. It's tab 35.**
 4 A. Okay.
 5 **Q. And one of the questions I have is for**
 6 **low-level concerns, and I'm on page 3, I think, of the**
 7 **document, where it says, "Low Level of Concern," it**
 8 **says, "Complete the action plan," but for medium- and**
 9 **high-level threats, it says contact district**
 10 **administration immediately.**
 11 A. Correct.
 12 **Q. I guess at the end of it, it says that a**
 13 **copy of the plan is given to you as the student**
 14 **support services coordinator?**
 15 A. Correct.
 16 **Q. So using this as an example, this is a**
 17 **threat assessment that you saw in the fall of 2013?**
 18 A. No.
 19 **Q. Okay. Because it says, as you can see,**
 20 **the box is checked copies of this plan have been given**
 21 **to the building administrator, Nate Thompson, and LPS**
 22 **security for medium- and high-level concerns, right?**
 23 A. Right.
 24 **Q. You were not given a copy of this threat**
 25 **assessment?**

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1 A. No.
 2 **Q. You were supposed to be given a copy of**
 3 **this threat assessment, correct?**
 4 A. Correct.
 5 **Q. I'm assuming you had a conversation with**
 6 **somebody about the fact that you're getting a copy of**
 7 **this was a mistake?**
 8 A. Correct.
 9 **Q. Who did you talk to and what did you**
 10 **learn?**
 11 A. Well, when the shooting occurred, my
 12 first question was, Have we done a threat assessment.
 13 And my secretary could not find that it had been sent
 14 into the district office with our records on a
 15 tracking spreadsheet. And so then the first that I
 16 heard that one had been done was -- I don't remember
 17 who told me, but someone notified me that it had been
 18 done, it had just not been sent over to the district.
 19 **Q. Okay. Did you have a conversation with**
 20 **Esther Song about that?**
 21 A. Yes.
 22 **Q. Tell me about that conversation.**
 23 A. I believe the first time I talked to her
 24 about it was the next morning on Saturday at the
 25 crisis counseling center, and she said it was in a

55

1 file in her office, that she had done one but had not
 2 sent it over.
 3 **Q. Did she say why?**
 4 A. No.
 5 **Q. Did you ask her why?**
 6 A. Yeah, and --
 7 **Q. What was her answer?**
 8 A. I don't recall her answer. I think it
 9 was something like, I don't know why.
 10 **Q. Did you have a discussion with Kevin**
 11 **Kolasa about this threat assessment?**
 12 A. Yes.
 13 **Q. And did you ask him why he didn't send it**
 14 **over?**
 15 A. Yes.
 16 **Q. And what did he say?**
 17 A. He said, I thought Esther was sending it.
 18 **Q. And did you have a conversation with**
 19 **Natalie Pramenko about this threat assessment?**
 20 A. Probably. Not in those first couple days
 21 after, but probably sometime. I don't remember when.
 22 **Q. Do you recall anything about your**
 23 **conversation with Natalie about this threat assessment**
 24 **and why you didn't get a copy of it?**
 25 A. I can't recall a lot of specifics. I

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1 mean, I believe I recall that she didn't have a copy
 2 of it either.
 3 **Q. That was going to be my next question.**
 4 A. And she didn't know who had sent it or
 5 not sent it.
 6 **Q. But you do recall that Natalie Pramenko**
 7 **said she hadn't seen this document prior to the**
 8 **shooting either?**
 9 A. Correct.
 10 **Q. Even though, again, the box is checked,**
 11 **copies had been given to the building administrator,**
 12 **that would be Natalie, right?**
 13 A. Well, that would also count for Kevin.
 14 Kevin would also be a building administrator.
 15 **Q. So at least he had a copy, right?**
 16 A. Correct.
 17 **Q. Did you have a conversation with Scott**
 18 **Murphy about the fact that you were supposed to get a**
 19 **copy of this and didn't?**
 20 A. Yes.
 21 **Q. Tell me about that conversation.**
 22 A. Oh, I mean, I can't remember the
 23 specifics of when and where that was either, but we
 24 certainly had a conversation. But it was not -- I
 25 mean, it was pretty quickly known on the district

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1 level that it didn't come to the district office and I
 2 hadn't reviewed it. So there was numerous
 3 conversations about that.

4 **Q. Why don't you tell me as best as you can**
 5 **what those conversations involved. Who said what?**

6 A. I mean, that was basically it. Just that
 7 it was never sent over, and, I mean, some of those
 8 conversations, follow-up conversations, happened later
 9 in the spring when Melissa Cooper, myself, and Steve
 10 talked with both Esther --

11 **Q. Hold on. I don't want to hear what you**
 12 **and other folks at the district talked about with**
 13 **Steve. I mean, I do, but I'm not allowed.**

14 A. Okay.

15 **Q. So, again, when it comes to your**
 16 **discussions with your counsel, with Mr. Everall, or**
 17 **Mr. Farrington, Steve will jump in when you're bumping**
 18 **up against that line, and that's appropriate for him**
 19 **to do. But setting aside conversations you had with**
 20 **the district's attorney, what can you tell me about**
 21 **the conversations you had with anybody about the fact**
 22 **that it was -- this threat assessment wasn't provided**
 23 **to you as the coordinator of student services?**

24 A. Well, I mean, the content of those
 25 conversations was pretty much the same, and it was,

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1 Was it supposed to be sent over? Yes. Why wasn't it
 2 sent over? I don't know. Where was it? It was in
 3 Esther's filing cabinet in the file. And that's
 4 essentially the content of the conversations.

5 **Q. Okay. You mentioned earlier today that**
 6 **one of your jobs was to evaluate staff, right?**

7 A. Yes, some staff, yes.

8 **Q. And would Esther Song be among the staff**
 9 **that you evaluated?**

10 A. No, I was not her direct evaluator.

11 **Q. Who was?**

12 A. At that time, it would have been one of
 13 the assistant principals who oversaw probably special
 14 education, which I'm guessing -- I think at the time,
 15 it was Kevin Kolasa.

16 **Q. Have you seen -- do you know whether or**
 17 **not Esther Song was reprimanded or disciplined in any**
 18 **way for any mistakes that she made in connection with**
 19 **the threat assessment she did on Karl Pierson?**

20 A. Not other than conversations I had with
 21 her. To my knowledge, there was no formal discipline,
 22 but there certainly were conversations.

23 **Q. Okay. Well, I'm assuming you reviewed**
 24 **this threat assessment in some detail since the**
 25 **shooting, correct?**

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1 A. Of course.

2 **Q. And there are a number of either mistakes**
 3 **or things that got missed in this threat assessment,**
 4 **aren't there?**

5 A. I don't know how I could answer that
 6 without the hindsight that I'm looking at right now.
 7 It's very difficult to go back to the time when they
 8 did this threat assessment with the knowledge they
 9 have with all of the hindsight we have now. So that's
 10 a pretty difficult question to answer.

11 **Q. Well, it's a pretty difficult situation.**
 12 **So I understand it's a difficult question to answer.**
 13 **But, you know, I took Esther's deposition Friday, and**
 14 **she admitted that there were a number of things that**
 15 **got missed or were mistakes in this, including things**
 16 **as simple as, was this a direct threat or an indirect**
 17 **threat. She admits that was a mistake. So I'm going**
 18 **to ask the question respectfully again. There were a**
 19 **number of things that were mistakes or that were**
 20 **missed in this threat assessment, weren't there?**

21 A. You know, I have to say I would be happy
 22 to talk one specific by specific if you want. I think
 23 it's really difficult to go back and say what was
 24 mistakes and what weren't based on the information
 25 that they have. I'll start with the direct threat.

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1 One of the challenges, direct and indirect -- and we
 2 did have this conversation quite a bit, one of the
 3 challenges with that is that law enforcement defines a
 4 direct threat very differently than we have in our
 5 school threat assessment training. And that's one of
 6 the issues that we've had to continue to address,
 7 which is law enforcement doesn't consider that a
 8 direct threat unless you say it to a person or in the
 9 presence of a person, and so there is confusion about
 10 that.

11 So if someone were to say to me, Is that
 12 a mistake? I would say, It really doesn't matter,
 13 because whether it was a direct or indirect, really
 14 doesn't matter in terms of the rest of this process.
 15 It's certainly a descriptor, and it certainly does
 16 give us an idea of the student's mode of threatening
 17 behavior, but -- so, you know, I guess that's why I'm
 18 trying to say we'd have to go specific by specific to
 19 whether I could say it was a mistake or not. And
 20 that's probably the most difficult one.

21 **Q. Well, certainly it was a mistake not to**
 22 **send this to you?**

23 A. Correct.

24 **Q. So we can at least agree that was a**
 25 **mistake that was made?**

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1 A. Correct.

2 **Q. And you said you had conversations about**

3 **this threat assessment with Esther?**

4 A. Correct.

5 **Q. Tell me about those conversations.**

6 A. Well, the primary one where we went

7 through this in depth was included with Steve so --

8 **Q. Oh, okay.**

9 A. -- I probably can't talk about that one.

10 **Q. No, you can't.**

11 A. The other conversations were basically,

12 Did you send it or why didn't you send it, which I

13 already told you about. She and I did talk about the

14 direct and indirect, and she said, I should have

15 checked direct, I don't know why I didn't. And we had

16 pretty much the same conversation I had with you which

17 is, Tell me why you think that. And we had that

18 conversation.

19 **Q. Okay. And I went off on that tangent**

20 **asking about whether Esther Song was reprimanded or**

21 **disciplined for any shortcomings in her work in**

22 **preparing and then circulating this threat assessment.**

23 **You said she got no formal discipline or reprimand,**

24 **correct?**

25 A. Not to my knowledge.

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1 **Q. Do you know why not?**

2 A. No.

3 **Q. Do you have an understanding of whether**

4 **or not her departure from the Littleton Public School**

5 **District had anything to do with her performance on**

6 **this threat assessment?**

7 A. I do not believe that her departure had

8 to do with the threat assessment. In my conversations

9 with her, it didn't circulate around that

10 specifically. I think part of the conversation is

11 that we did not -- and my input into the situation was

12 not as a direct evaluator, obviously, but to my

13 understanding, there was not violations of district

14 policy to the point of reprimand.

15 **Q. Okay. Well, let's talk about that for**

16 **just a minute. Did you have any involvement in**

17 **preparing this form, not filling it out --**

18 A. Yes.

19 **Q. -- in Karl's case, but you helped --**

20 A. Yes.

21 **Q. -- prepare this document, correct?**

22 A. Yes.

23 **Q. And one of the things that is on this**

24 **document at the bottom of the first page is a note**

25 **that is bolded and underlined. It says that the**

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1 **threat assessment team should check all of the threat**

2 **assessment factors, and in bold print underlined,**

3 **provide notes explaining the evidence next to each**

4 **statement checked, right? And for a number of the**

5 **threat assessment factors checked, Esther neglected to**

6 **do that; isn't that true?**

7 A. Correct.

8 **Q. Would you agree that that's a mistake?**

9 A. I would -- I would say yes.

10 **Q. Okay. Did you have any discussions with**

11 **Esther Song or Kevin Kolasa about the fact that they**

12 **didn't explain their reasoning for the various boxes**

13 **that were checked on the threat assessment or at-risk**

14 **factors?**

15 A. I believe so.

16 **Q. And to the extent that they did not**

17 **happen in the presence of counsel, can you tell me**

18 **about those discussions?**

19 A. There wasn't any that happened outside of

20 counsel.

21 **Q. Okay. We've been going for a little over**

22 **-- almost an hour and a half now. Why don't we take a**

23 **quick break.**

24 **(Recess taken, 10:23 a.m. to 10:43 a.m.)**

25 MR. ROCHE: Back on the record, if we

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1 could.

2 **Q. (BY MR. ROCHE) Before we broke, we were**

3 **talking about the threat assessment that was performed**

4 **by Esther Song and Kevin Kolasa in September of 2013.**

5 **You mentioned that the policy was for you to review**

6 **all of these threat assessments for the entire**

7 **district as they came in?**

8 A. Correct.

9 **Q. What was your purpose for your reviewing**

10 **those threat assessments?**

11 A. Essentially, it was to get a second set

12 of eyes and look for things that may be extra

13 concerns, review what the team had done. They were

14 following up with the student, seeing if there was

15 anything that needed to be clarified or confirmed, and

16 then also, for the purpose of kind of tracking, we

17 kept a spreadsheet with all of them so that we track

18 in terms of future incidents and correlate with

19 suicide interventions or other data that we had.

20 **Q. All right. And when you finally did get**

21 **your hands on the Pierson threat assessment after the**

22 **shooting, did it raise any flags in your mind?**

23 A. Well, I mean, it was the -- Sunday was

24 the first day we got allowed back into the building.

25 So obviously we were all still in a state of shock and

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1 trauma, and I think at the time, you know, you do an
 2 immediate review and you try to look at things that
 3 are there. And certainly I had questions about some
 4 things on there, just like anyone would. Some of it
 5 you already pointed out. So, yeah, there was kind of
 6 an initial review, and then obviously a more in-depth
 7 look later.

8 **Q. Okay. And what were the questions you**
 9 **had besides the things that we've already discussed in**
 10 **terms of how this was completed?**

11 A. Well, I wanted to know more information
 12 about how Tracy Murphy felt about the situation and,
 13 you know, how did he stand with the action plan that
 14 was put in place. I wanted to know more about the
 15 conversation with the family and what the expectations
 16 were in terms of follow-up mental health. Certainly,
 17 I wanted to know more about a couple of these pieces
 18 in terms of the behavioral pieces. So what was the
 19 actual behavioral history at school. Did we have any
 20 access to any outside mental health reports or
 21 evaluations. So all of those things start going
 22 through my head as you review something like this.

23 **Q. And you can see in the threat assessment**
 24 **that was performed on Karl Pierson that there's a box**
 25 **checked that says staff is fearful of the student, and**

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1 **then Mr. Murphy's name is written in, right?**

2 A. Correct.

3 **Q. That's one of the questions that you had**
 4 **as you reviewed this in the immediate aftermath of the**
 5 **shooting, right?**

6 A. Correct.

7 **Q. You wanted to know more about how**
 8 **Mr. Murphy felt about this threat assessment and**
 9 **action plan, right?**

10 A. Correct.

11 **Q. And there is really not much information**
 12 **in this document about how he felt about any of these**
 13 **things, right, other than that one box?**

14 A. Correct.

15 **Q. Nowhere in this is it disclosed that**
 16 **Mr. Murphy was so afraid of Karl Pierson and his**
 17 **potential for violence that he seriously considered**
 18 **quitting his job and leaving the school, is there?**

19 A. No.

20 **Q. That would have been something that would**
 21 **be important for you to know in reviewing this threat**
 22 **assessment, wouldn't it?**

23 A. Yes.

24 **Q. And that would have affected your thought**
 25 **on what is the appropriate threat level to mark on**

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1 **this, and more importantly what follow-up should be**
 2 **done with respect to Karl Pierson, right?**

3 A. Yeah, in some senses. At a minimum, I
 4 would want to know where he is at and what the action
 5 plan was, you know, in terms of following up with him
 6 and the relationship and the next steps.

7 **Q. And that's something you've mentioned now**
 8 **a couple of times, and I agree. An important part of**
 9 **this is what is the follow-up with the student, right?**

10 A. Correct.

11 **Q. And what was your view of the follow-up**
 12 **that was called for in the threat assessment that was**
 13 **done on Karl Pierson? Do you think it was adequate?**

14 A. In terms of what was documented here
 15 or --

16 **Q. I'm talking about the follow-up that was**
 17 **done with respect to Karl Pierson after this document**
 18 **was created.**

19 A. Well, for a low-level threat -- so let's
 20 take it that way. For a low-level threat the things
 21 that occurred here, I think, are appropriate and
 22 typical. And, you know, our guidance is that for a
 23 low level of concern, you're certainly doing some
 24 relationship pieces, you're doing some follow-up
 25 pieces, you're doing skill building pieces with

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1 students. You're doing some monitoring and those kind
 2 of pieces, and a follow-up meeting was appropriate,
 3 which was scheduled. And then obviously the mental
 4 health piece was the other piece. And that, I think,
 5 in this situation, was appropriate that there was a
 6 request to communicate with the therapist involved
 7 with him.

8 **Q. And you talked about ongoing monitoring.**
 9 **What ongoing monitoring happens as laid out in this**
 10 **document?**

11 A. Well, typically how we train for a
 12 low-level threat is that you're continuing to, you
 13 know, informally keep an eye on the kid. You're
 14 looking to see if there's additional incidents or
 15 incidents that happen in school.

16 **Q. Okay. But who was doing that? This**
 17 **document doesn't say anybody is going to do any**
 18 **ongoing monitoring of Karl Pierson, does it?**

19 A. Well, as additional measures, meet once a
 20 week with the psychologist.

21 **Q. That was an outside psychologist, right?**

22 A. I can't tell.

23 **Q. Well, did you ask Esther Song whether or**
 24 **not she met once a week with Karl Pierson after this**
 25 **threat assessment?**

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1 A. Probably. I can't recall specifically.
 2 **Q. Do you know whether she ever met with**
 3 **Karl Pierson again after participating in this threat**
 4 **assessment?**
 5 A. I don't believe she did.
 6 **Q. Okay. Well, I'm looking at the**
 7 **discipline and monitoring section of the threat**
 8 **assessment, and it refers to a reentry meeting, which**
 9 **was the day that this document was prepared, correct?**
 10 A. Correct.
 11 **Q. Okay. And that actually raises one**
 12 **question. I know I've seen in media reports that**
 13 **Karl's father thinks that this document was prepared**
 14 **after the shooting. Do you have any reason to believe**
 15 **that that's true or not true?**
 16 A. No. Well, you kind of asked me two
 17 things.
 18 **Q. You're right.**
 19 A. But, no, I don't have any reason to
 20 believe that that happened after the shooting.
 21 **Q. Okay. Going back to the discipline and**
 22 **monitoring piece of this threat assessment. Other**
 23 **than the meeting at which this document was prepared**
 24 **and the note that there was going to be an action plan**
 25 **review meeting two weeks later, was there ever any**

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1 **other monitoring done of Karl Pierson after he had**
 2 **threatened to kill Tracy Murphy?**
 3 A. I guess that goes to how do you define
 4 monitoring. I mean, I -- my understanding is that
 5 certainly there was people talking about him in
 6 conversation and that the administration had
 7 conversation about what happened here and keeping him
 8 on the radar. In terms of formal, regular meetings
 9 with him, I would say I don't believe there were. But
 10 other than the follow-up meeting in September, late
 11 September.
 12 **Q. You also mentioned when you were talking**
 13 **about one of the things that you had questions about**
 14 **with respect to this threat assessment was skill**
 15 **building steps that were recommended, correct?**
 16 A. I would say that's often a component of
 17 -- depending on the situation that when it's a
 18 lower-level threat identified, that we're not always
 19 using discipline. We are sometimes using skill
 20 building, and, again, the range of kids that we do
 21 this with goes all the way from a kindergartner to a
 22 high schooler. So depending on the situation, there
 23 might be -- you know, that might be a component for
 24 sure.
 25 **Q. And did LPS offer any skill building**

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1 **services to Karl Pierson as a consequence or as a part**
 2 **of this threat assessment?**
 3 A. To my knowledge, the only thing I know
 4 for sure was that there was the -- you know, the offer
 5 to have mediation or conversation with Tracy Murphy.
 6 I do believe that there was some kind of conversation
 7 about him following up with Esther Song. I notice it
 8 says follow-up intervention by psychologist, but I
 9 don't believe there was a plan to do that on a weekly
 10 basis or appointments. And then I believe the other
 11 piece of the plan was that the school was going to
 12 work with his outside providers to talk about what he
 13 needed and what was going on or at least that was the
 14 intent and request.
 15 **Q. All right. Does LPS ever condition a**
 16 **student's reentry into the building on receiving**
 17 **information from an outside therapist who was treating**
 18 **that student?**
 19 A. On occasion. It's very difficult to
 20 legally force a student to get mental health treatment
 21 as a condition. We certainly -- our first approach is
 22 to always work with the family and ask for an
 23 agreement. So in most cases, we work with a family to
 24 get agreement that some type of either evaluation or
 25 agreement to get ongoing counseling with the release

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1 of information would be the agreement we make upon a
 2 student's return. And often sometimes that helps us
 3 avoid expulsion if the family agrees to work with us
 4 around giving us access to talking to the private
 5 therapist.
 6 One of the legal challenges with that is
 7 when you start requiring it, then obviously it's a
 8 funding piece. Then schools become more liable for
 9 paying for that mental health, which could go beyond
 10 just an initial assessment. So it's a balancing act,
 11 and I would say our first approach is to try to get
 12 agreement with the family.
 13 **Q. And we know Esther Song asked**
 14 **Mrs. Pierson for releases and didn't get them, right?**
 15 **You're aware of that?**
 16 A. That's my understanding.
 17 **Q. Do you know whether or not she did a**
 18 **follow-up with Mrs. Pierson to pester her for those**
 19 **releases?**
 20 A. Not that I know of.
 21 **Q. If you had gotten Exhibit 35 in the fall**
 22 **of 2013, what would you have done?**
 23 A. Again, I mean, it's hard with hindsight,
 24 but I will do my best to kind of guess. I think I
 25 probably would have called the school and asked some

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1 questions. Mainly because there was a specific -- you
 2 know, a specific staff member who felt threatened and
 3 was threatened and that we always take more attention
 4 with that because that's more specific, as opposed to,
 5 you know, a kid who's had ongoing behavioral issues
 6 and maybe some out-of-control behaviors. But when
 7 there's a specific staff member, I probably would have
 8 called the school and touched base with them and asked
 9 them for some more information and probably asked
 10 about a few of the things on here that we've talked
 11 about already.

12 **Q. Do you know whether or not Esther Song**
 13 **spoke to Tracy Murphy before she filled out this**
 14 **document?**

15 A. I don't believe that she interviewed him.
 16 I know Kevin -- my understanding is that Kevin Kolasa
 17 interviewed him as a part of this process. I don't
 18 believe Esther interviewed him. I don't know if she
 19 had any conversation or -- you know, on the surface or
 20 not. I know they had a number of conversations, but I
 21 can't recall what the exact timeline is on those.

22 **Q. Okay. Understanding that you did not see**
 23 **this document until after the shooting, on a related**
 24 **note, had you ever met Karl Pierson?**

25 A. No.

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1 **Q. Had you ever met his parents?**

2 A. No.

3 **Q. Had you ever spoken to Karl or his**
 4 **parents?**

5 A. Prior to?

6 **Q. Yes.**

7 A. No.

8 **Q. And there are a couple of different**
 9 **places on this document that suggest or recommend that**
 10 **if there's any questions or confusion or concerns**
 11 **about how to complete the document, that the team**
 12 **members should call you, right?**

13 A. Correct.

14 **Q. Neither of them did?**

15 A. Correct.

16 **Q. Now, it's my understanding that Esther**
 17 **Song received some training from you in the spring of**
 18 **2011 on how to perform a threat assessment; is that**
 19 **right?**

20 A. Correct.

21 **Q. And Kevin Kolasa had not received that**
 22 **training prior to the shooting, had he?**

23 A. I can't answer that.

24 **Q. Because you don't know?**

25 A. I don't have documentation that he

75

1 attended the training.

2 **Q. Do you have an independent recollection**
 3 **of seeing him sitting in an audience while you taught**
 4 **administrators and counselors on how to perform threat**
 5 **assessments?**

6 A. I did a lot of trainings, and I know he
 7 attended some of those trainings. But I cannot
 8 specifically say he was at that training. I do know
 9 that he and I worked a threat assessment case the year
 10 prior, so we had worked a case together, both he and
 11 Esther and I had worked just one year prior to this.
 12 So I felt confident that they had been through that
 13 one and they knew the process. But I don't have
 14 documentation --

15 **Q. Sure.**

16 A. -- that he was at the training.

17 **Q. All right. And you're talking about a**
 18 **threat assessment that was done on December 13, 2012,**
 19 **about a kid who had previously brought a knife to**
 20 **school, had been hospitalized --**

21 A. Correct.

22 **Q. -- for mental health issues? Kevin was a**
 23 **part of that?**

24 A. Correct.

25 **Q. Did you have any concerns about how**

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1 **Esther or Kevin performed on that threat assessment?**

2 A. Not that I can recall. Nothing specific
 3 that I can recall that was a concern or question.

4 **Q. Okay. Do you recall why you were brought**
 5 **in or how you were brought in to participate in that**
 6 **threat assessment in 2012?**

7 A. I don't remember who exactly called me.
 8 I believe it was either Kevin Kolasa or Steve Sisler,
 9 one of the AP's. They're both involved in that one.
 10 I know there were -- a big concern was the concern
 11 about weapons, that we had pictures of the student
 12 with guns from the Internet, and we had a pretty
 13 specific threat that he made a rap song about another
 14 student and threatening and had a history of having
 15 sharp object -- it wasn't a knife, but it was
 16 something like a knife that he had at school previous,
 17 and we had some pretty significant concerns. So I
 18 don't remember exactly how I got -- who it was that
 19 called me, but I did participate in that one.

20 **Q. All right. Will you take a look at**
 21 **Exhibit 38, and I don't know if it's in the books yet.**
 22 **It's right in this stack.**

23 A. Okay.

24 **Q. Exhibit 38 is a Secret Service,**
 25 **Department of Education document titled "Threat**

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1 **Assessment in Schools: A Guide to Managing**
 2 **Threatening Situations and to Creating Safe School**
 3 **Climates." Do you see that?**
 4 A. Yes.
 5 **Q. Is this a document you're familiar with?**
 6 A. Yes.
 7 **Q. And I've referred to this as sort of a**
 8 **national standard on how you do a threat assessment in**
 9 **a school. Is that a characterization you would agree**
 10 **with?**
 11 A. It certainly is one of the seminal works
 12 on this event. We've used it a lot to help guide our
 13 process, sure.
 14 **Q. And that's one of my questions, is this**
 15 **is a document that was created in 2004, correct?**
 16 A. Yes. It was a result of some other
 17 earlier work, but they compiled it in this form, I
 18 think, in '04, yeah.
 19 **Q. Right. There was a related report that**
 20 **is actually Exhibit 37, The Final Report and Findings**
 21 **of the Safe School Initiative --**
 22 A. Yeah, these --
 23 **Q. -- released at the same time?**
 24 A. Yeah, correct. Correct.
 25 **Q. And they're related documents?**

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1 A. Yes.
 2 **Q. And Exhibit 38, the threat assessment in**
 3 **schools document was produced as part of an effort**
 4 **nationally to improve on the threat assessment process**
 5 **at America's schools, right?**
 6 A. Yeah, I think really to help schools
 7 create a process. Prior to that, there was not a lot
 8 going on formally in schools. I mean, some schools
 9 had, but certainly it was very brand-new at that time.
 10 **Q. All right.**
 11 A. My understanding. And, again, I wasn't
 12 in the schools, public schools, at that time.
 13 **Q. Right. But when you helped to develop**
 14 **the threat assessment template that LPS used in the**
 15 **fall of 2013, this was a document that you were**
 16 **familiar with?**
 17 A. Yes. There was a draft of this template
 18 and an initial draft that had been created by a
 19 predecessor of mine. And then in '09-'10, when I took
 20 over this process, yes, this was one of the works we
 21 used to help update that.
 22 **Q. Okay. One thing that I've struggled with**
 23 **throughout this arbitration is trying to get a handle**
 24 **on whether or not Arapahoe High School had an**
 25 **established threat assessment team in place in the**

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1 **fall of 2013. Do you know, was there an established**
 2 **threat assessment team?**
 3 A. To my knowledge, there wasn't an
 4 established -- you know, here is the four people.
 5 But, again, in our training, we talked with folks
 6 about, you know, having the same exact four people is
 7 not always the most important thing. What's most
 8 important is that you have people who are trained and
 9 that you have people who know that student. And so
 10 we, to this day, train that, you know, it's not always
 11 necessarily advisable to have these same, three, four
 12 people because, one, they may not be there on any
 13 given day. Two, we want people who know this kid and
 14 their history the best.
 15 Obviously, they need to be trained, the
 16 people who are leading the process. But that is one
 17 of the issues that there's a lot of documentation and
 18 guidance that says you need an established team, and
 19 in our training, we say certainly you need
 20 administrators and mental health staff who are trained
 21 in this process. But not necessarily the exact same
 22 three or four people on every single one.
 23 **Q. All right. Well, let's talk about --**
 24 **we'll get back to that. Let's talk about Exhibit 38,**
 25 **and how it was used. One of the key pieces of**

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1 **guidance that comes out of this study or this effort**
 2 **is found on page 11, and it talks about, "Fostering a**
 3 **Culture of Respect."**
 4 A. Uh-huh.
 5 **Q. Do you have that there?**
 6 A. Yes.
 7 **Q. And I guess my question very broadly is,**
 8 **how does Littleton Public Schools do this in its**
 9 **buildings?**
 10 A. Well, our positive behavior support
 11 initiative is a big piece of that, and certainly each
 12 school has their own flexibility as kind of being
 13 their site-based management model to choose which
 14 activities they feel are the best for their culture
 15 and climate. As a district, we support them by
 16 providing curriculum and resources. Some examples of
 17 that is, you know, at the early grades, we support
 18 them in developing their behavioral expectations and
 19 how they teach and train that.
 20 So for younger kids, it's how do we use
 21 the lunch room, how do we use the restroom and wash
 22 our hands, all the way up to, you know, curriculum
 23 that teaches social skills and empathy and providing
 24 that to schools and supporting the implementation of
 25 that. And then at the middle and high school levels,

81	<p>1 we have a couple of things.</p> <p>2 One is we obviously have, as I mentioned,</p> <p>3 some of the curriculum that schools develop in --</p> <p>4 during their core advisory or homeroom times, as well</p> <p>5 as a lot of those middle schools do those assemblies,</p> <p>6 school-based assemblies, as part of positive behavior</p> <p>7 support. There's a lot of what we call</p> <p>8 reinforcements, so really working with kids when</p> <p>9 they're doing correct things, tickets, rewards, those</p> <p>10 kind of things.</p> <p>11 Q. Sure.</p> <p>12 A. And at the high school level, what we had</p> <p>13 more often is really try to have -- there's more</p> <p>14 larger assemblies and then student-led initiatives.</p> <p>15 So each of our high schools has had different</p> <p>16 student-led initiatives where -- whether it's student</p> <p>17 council or other student leadership groups, promote</p> <p>18 those.</p> <p>19 Q. Okay.</p> <p>20 A. And then, of course, in our code of</p> <p>21 conduct we try to be very clear about what's expected.</p> <p>22 Q. Okay. And since you have been at</p> <p>23 Littleton Public Schools has -- have any of the</p> <p>24 schools, including Arapahoe, conducted a culture or</p> <p>25 climate survey?</p>	83	<p>1 behavioral support schools and some don't designate</p> <p>2 themselves as that?</p> <p>3 A. Correct.</p> <p>4 Q. Is Arapahoe High School a positive</p> <p>5 behavioral support school?</p> <p>6 A. No.</p> <p>7 Q. And who decides whether or not a given</p> <p>8 school is a positive behavioral support school?</p> <p>9 A. Well, it initially started in our</p> <p>10 district as a funded grant where we -- schools can</p> <p>11 agree to sign up and send a team and then they would</p> <p>12 be trained and then we would have coaches that coach</p> <p>13 them on implementing that model. We started at a</p> <p>14 number of schools and then added more the next year</p> <p>15 and more the next year.</p> <p>16 In our district and around the nation and</p> <p>17 state, high schools tend to be more -- struggle more</p> <p>18 with adhering to that model or wanting to do that</p> <p>19 model, I guess is a better way to say it, because it's</p> <p>20 much harder to implement it in a larger system. So</p> <p>21 nationally the numbers around who does positive</p> <p>22 behavior support as a model are much lower for high</p> <p>23 schools.</p> <p>24 And in our district, the only high school</p> <p>25 that has been working to, you know, be a -- to</p>
82	<p>1 A. Yes.</p> <p>2 Q. Which school and how often is that done?</p> <p>3 A. Well, I mean, I can't, off the top of my</p> <p>4 head, tell you exactly. So each school has some</p> <p>5 ability to choose how and when they do that.</p> <p>6 Certainly, there was more direct surveying of students</p> <p>7 going on before the state school improvement plan</p> <p>8 changed. Previously, I don't know if it was four of</p> <p>9 five years ago, the school improvement plans required</p> <p>10 a section of school climate and culture. So every</p> <p>11 school had to set a goal. And so there was certainly</p> <p>12 more focus and attention, because they had to report</p> <p>13 on that goal each year. When that template changed,</p> <p>14 there wasn't as much data required to support how are</p> <p>15 you doing in that area, so that certainly did take</p> <p>16 away some of the, you know, probably impetus to do</p> <p>17 that on an annual or every other year basis.</p> <p>18 In our district, it's been established</p> <p>19 that it's a site-based decision around when that</p> <p>20 happens. Our schools that are working to be a</p> <p>21 positive behavior support school to the fidelity to</p> <p>22 that model, as I mentioned earlier, is a requirement</p> <p>23 that you do some surveying of students.</p> <p>24 Q. So are some schools -- I'm intrigued by</p> <p>25 something. You said some schools are positive</p>	84	<p>1 fidelity, is what we call it, to that model, is the</p> <p>2 alternative high school. Our other high schools do a</p> <p>3 lot of the same principles, they follow a lot of the</p> <p>4 same principles and establish what we call a pyramid</p> <p>5 of social emotional supports, but they may not</p> <p>6 necessarily be meeting all of the fidelity measures</p> <p>7 that, what we call a positive behavior support</p> <p>8 fidelity, is the best way to say it.</p> <p>9 Q. Let's keep plowing through Exhibit 38, if</p> <p>10 we could. On the next page, again, one of the</p> <p>11 cornerstone ideas is that it's important to create</p> <p>12 connections between adults and students. Do you see</p> <p>13 that?</p> <p>14 A. Yes.</p> <p>15 Q. Do you agree that that is a cornerstone</p> <p>16 of fostering a safe school?</p> <p>17 A. Yes.</p> <p>18 Q. And in the discussion of that point, the</p> <p>19 report indicates that "In a climate of safety,</p> <p>20 students have a positive connection to at least one</p> <p>21 adult in authority. Each student feels that there is</p> <p>22 an adult to whom he or she can turn for support and</p> <p>23 advice if things get tough, and with whom that student</p> <p>24 can share his or her concerns openly and without fear</p> <p>25 of shame or reprisal." Do you see that?</p>

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1 A. Yes.

2 **Q. And it goes on to talk about teachers,**

3 **deans, secretaries, coaches, custodians, bus drivers,**

4 **all kinds of folks within the school. Right?**

5 A. Yes.

6 **Q. And do you agree that is an important**

7 **thing for the school to be mindful of in determining**

8 **how to help students who may be of concern?**

9 A. Yes.

10 **Q. Do you know -- did anyone at Arapahoe**

11 **ever ask Karl Pierson whether he had such a**

12 **relationship with somebody at the school?**

13 A. I don't have specific knowledge if anyone

14 asked him. I do know I had many conversations with

15 teachers who felt like they had that relationship with

16 him, felt like they had a relationship where he

17 trusted them, they felt like they could have an impact

18 on him, and felt like they had a good relationship.

19 **Q. As part of this threat assessment**

20 **process, did anybody from Arapahoe High School reach**

21 **out to those teachers and ask, Are you concerned about**

22 **Karl?**

23 A. Not to my knowledge.

24 **Q. Wouldn't that have been an important**

25 **thing to do to get a more holistic view of what was**

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1 **going on with this kid?**

2 A. Yes.

3 **Q. Is that something that the counselors and**

4 **school psychologists and mental health professionals**

5 **at Littleton Public Schools are now doing in the wake**

6 **of this shooting?**

7 A. It's always been a part of our training.

8 **Q. Did you ask why that part of your**

9 **training didn't happen in this case?**

10 A. I don't know if I asked it in that

11 specific way, but I believe we had conversations

12 about, Did you talk to other teachers? Yes.

13 **Q. One of the issues that has come up as**

14 **part of the investigation into this tragedy is the**

15 **fact that Karl Pierson was seen looking at weapons**

16 **shortly after the threat assessment and well before**

17 **the shooting. Are you familiar with that**

18 **circumstance?**

19 A. Yes.

20 **Q. And that was brought up to the**

21 **administration at Arapahoe High School, right?**

22 A. I've heard that.

23 **Q. And nothing was done, there was no**

24 **follow-up, there was no intervention, there was no --**

25 **to use Dr. Nicoletti's term, there was no disruption**

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1 **put in place as a consequence of that incident, right?**

2 A. That's my understanding.

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

4 **about why nobody did anything when they found out that**

5 **Karl Pierson was looking at guns on his laptop in the**

6 **cafeteria shortly after threatening to kill a teacher?**

7 A. I've had some conversation.

8 **Q. And, again, excluding whatever you**

9 **discussed with Mr. Everall, tell me about those**

10 **conversations.**

11 A. Well, the only one that I can talk about

12 was I've had some conversation with Darrell Meredith

13 and James Englert, and I had some conversations early

14 on with the two campus security monitors.

15 **Q. Tell me about those.**

16 A. Which one?

17 **Q. Well, let's start with --**

18 A. Do you want me to start with --

19 **Q. Let's start with Mr. Meredith.**

20 A. Okay. The conversation with him is, you

21 know, Did you know about this? Yes, we heard about

22 it. It was in a security meeting, and it was our

23 understanding that we couldn't do anything about it.

24 In terms of him using his own computer, to my

25 recollection -- I can't remember right now, whether

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1 Darrell and Kevin Kolasa had any conversation about

2 that. I know we had some conversation about that, but

3 I don't remember exactly what his answer was to that.

4 **Q. Okay. What you were told is that**

5 **Mr. Meredith didn't think he could do anything about**

6 **the fact that Karl Pierson was looking at guns on his**

7 **laptop, right?**

8 A. Yes.

9 **Q. And, in fact, the Arapahoe High School**

10 **student code of conduct gives the school specific**

11 **authority to search things like laptops and iPads,**

12 **phones, things like that when there's a reasonable**

13 **suspicion that there is a threat; isn't that true?**

14 A. Yeah, reasonable suspicion is the

15 standard. And I don't know if it's necessarily

16 reasonable suspicion of a threat, but reasonable

17 suspicion that that search would uncover something,

18 some evidence or some, you know -- yeah.

19 **Q. Correct. And Mr. Meredith was the head**

20 **of security on the administrative team for that**

21 **building?**

22 A. That's my understanding.

23 **Q. And he was just wrong about that, wasn't**

24 **he?**

25 A. Yes.

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1 **Q. And did you explain that to him?**
 2 A. I've had some conversation.
 3 **Q. Tell me about those.**
 4 A. I think I've kind of told you the most
 5 that I can tell you. I think -- I also think that he
 6 -- the one other, you know, piece of the conversation
 7 that I can recall is him feeling like, you know, that
 8 he had to have this conversation with, you know, the
 9 SRO and that there was -- you know, they were in a
 10 part of a security meeting. That's about -- I mean,
 11 that's about all I can recall from that early
 12 conversation with him.
 13 **Q. What about your conversations with Deputy**
 14 **Englert about this subject?**
 15 A. I haven't had any specific conversations
 16 about this that I can recall.
 17 **Q. Okay. You said you had some**
 18 **conversations with Cameron Rust and Christina Kolk as**
 19 **well?**
 20 A. Yes.
 21 **Q. Tell me about those conversations.**
 22 A. Just very brief, a lot of anger from
 23 them. They felt like they shared that in a security
 24 meeting and that it was not responded to
 25 appropriately.

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1 **Q. Do you agree with them?**
 2 A. Yeah, I do.
 3 **Q. And what would have been the appropriate**
 4 **response, given the fact that Karl Pierson had just**
 5 **been the subject of a threat assessment?**
 6 A. Kevin Kolasa should have been brought
 7 into the conversation as the person who ran that
 8 threat assessment. Obviously, probably bringing the
 9 folks back together who participated in that threat
 10 assessment. Obviously, based on that conversation,
 11 there were options for possibly doing a search,
 12 contacting parents, and asking again about information
 13 related to weapons.
 14 I think the difficult piece of this is
 15 people knew that Karl was involved in a shooting
 16 group, and so I think in -- this is my perception, I
 17 think that people felt like he had the right to be
 18 looking at guns. He had the right to look at guns.
 19 He -- you know, people knew he was active in doing
 20 that. So I think that may -- that's -- I guess,
 21 that's my guess in terms of why maybe there was less
 22 attention put to that.
 23 **Q. Well, who within the building, knew that**
 24 **Karl shot guns?**
 25 A. Oh, I -- prior to -- you mean prior to

91

1 the --
 2 **Q. Prior to.**
 3 A. I mean, all I can speak about is things
 4 I've read anecdotally from all of the information that
 5 came out after, documents and things. My
 6 understanding is that a number of students knew,
 7 adults in his life knew. Beyond that, I can't tell
 8 you, you know, which exact individuals all knew that
 9 prior to.
 10 **Q. Do you have an understanding as to**
 11 **whether or not anybody employed by Littleton Public**
 12 **Schools knew that Karl shot guns prior to the**
 13 **shooting?**
 14 A. I can't tell you specifically, no.
 15 **Q. But that would have been a factor that**
 16 **would have affected the level of concern created by**
 17 **the fact that he had threatened to kill a teacher,**
 18 **right?**
 19 A. Yes.
 20 **Q. And that's because one of the key**
 21 **findings of the Secret Service and the Department of**
 22 **Education is that most attackers had access to and had**
 23 **used weapons prior to their attack, right?**
 24 A. Correct.
 25 **Q. You're familiar with those ten key**

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1 **findings?**
 2 A. Yes.
 3 **Q. And so if the people performing the**
 4 **threat assessment on Karl Pierson knew that he had**
 5 **access to or experience using weapons, that would have**
 6 **been something that potentially increased the level of**
 7 **threat posed by his threat to kill Tracy Murphy,**
 8 **right?**
 9 A. Potentially, yes.
 10 **Q. Because it would suggest that he had the**
 11 **skills, and, perhaps, the capacity to act on that**
 12 **threat, right?**
 13 A. Correct.
 14 **Q. Let's keep going through Exhibit 38, and**
 15 **I'm going to ask you to jump to chapter 4, which is**
 16 **titled "Implementing a school threat assessment**
 17 **process."**
 18 MR. EVERALL: What page is that?
 19 MR. ROCHE: It is -- go to page 29.
 20 MR. EVERALL: I've got it.
 21 MR. ROCHE: You got it?
 22 MR. EVERALL: Yeah.
 23 **Q. (BY MR. ROCHE) And on page 29 -- I need**
 24 **my cheater glasses -- this study identifies six**
 25 **principles that form the foundation of the threat**

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1 assessment process. Do you see that?
 2 A. Yes.
 3 Q. And they are -- the first one is,
 4 "Targeted violence is the end result of an
 5 understandable, and oftentimes discern ible, process
 6 of thinking and behavior," right?
 7 A. Yes.
 8 Q. Another one is, "Targeted violence stems
 9 from an intersection among the individual, the
 10 situation, the setting, and the target," correct?
 11 A. Yep.
 12 Q. Would you agree with both of those as key
 13 principles to the threat assessment process?
 14 A. Yes.
 15 Q. The third principle is "An investigative,
 16 skeptical, inquisitive mindset is critical to
 17 successful threat assessment," right?
 18 A. Uh-huh.
 19 Q. And do you agree with that principle as
 20 well?
 21 A. Yes.
 22 Q. Another principle is that "Effective
 23 threat assessments are based on facts rather than on
 24 characteristics or 'traits,'" agreed?
 25 A. Yes.

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1 Q. And you agree with that one as well?
 2 A. Yes.
 3 Q. The fifth one is, "An 'integrated systems
 4 approach' should guide threat assessment inquiries and
 5 investigations," correct?
 6 A. Yes.
 7 Q. And then the final principle is, "The
 8 central question in a threat assessment inquiry or
 9 investigation is whether a student poses a threat, not
 10 whether the student has made a threat," right?
 11 A. Correct.
 12 Q. And you agree with that one as well?
 13 A. Yes.
 14 Q. And it was important to make sure that
 15 the people in LPS performing threat assessments
 16 understood what those six principles were, right?
 17 A. Yes.
 18 Q. Okay. Let's take a look at Exhibit 4,
 19 which is in this book, the bigger one. What is
 20 Exhibit 4?
 21 A. It looks like the PowerPoint slides from
 22 the spring of '11 training for threat assessment.
 23 Q. And I will tell you that this is -- or I
 24 have been told that this is the training session that
 25 Esther Song attended on how to do a threat assessment.

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1 Is this a training program that you put on?
 2 A. Yes, I led this training.
 3 Q. And you'll see very early in -- in fact,
 4 the first substantive slide in this presentation talks
 5 about the ten key findings --
 6 A. Uh-huh.
 7 Q. -- right?
 8 A. Yes.
 9 Q. I don't see anything about these
 10 principles, though. So help me understand, did you
 11 train Esther Song and the other LPS mental health
 12 professionals on the principles that formed the
 13 foundation of the threat assessment process in 2011?
 14 A. Yeah, I don't see a slide on those, but I
 15 would say they're integrated in this training. So,
 16 obviously, this book is a part of our training. I
 17 have it at every training. We talk to folks about it.
 18 These key findings came out of the research that was
 19 done that generated the result of this.
 20 Q. Correct. That's this Exhibit 37, I
 21 believe, right, or this one?
 22 A. Well, that's the second version of it,
 23 yeah, you're right. It was a 2002 version, but yes.
 24 Q. Okay.
 25 A. So, yeah, there may not be a specific

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1 slide on it.
 2 Q. And I ask about that because the idea
 3 that it is critical to bring an investigative,
 4 skeptical, inquisitive mindset to the threat
 5 assessment process seems like it was missed in this
 6 case, at least in Karl's. Okay. And my question is,
 7 did you train people like Esther Song to recognize the
 8 importance of bringing that mindset to the threat
 9 assessment process?
 10 A. Yes, I believe I did, and this slide here
 11 that has the iceberg is where we talk about a lot of
 12 that in terms of, you know, you see what's on the top
 13 of an iceberg, but you don't know what's underneath.
 14 And so this process is trying to figure out what is
 15 underneath, as best as we can possible and using all
 16 of the sources of information and inquisitive mindset
 17 to figure that piece out. So that's the visual
 18 analogy that we use when we're training and teaching
 19 that.
 20 Q. Okay. And that's the slide I was going
 21 to ask you about, actually. The two slides, one
 22 starts with the phrase, "It's like approaching an
 23 iceberg." And then the second slide says, "You have
 24 to beware of what you don't know." What do you see in
 25 the threat assessment that was done on Karl Pierson

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1 **that indicates that Esther Song or Kevin Kolasa was**
 2 **remotely mindful or wary of what they didn't know in**
 3 **performing that threat assessment? It's 35.**
 4 A. Well, I think -- I mean, the fact that
 5 there's comments in there about the conversation with
 6 parents about mental health is important. I would be
 7 very concerned if there wasn't conversation with
 8 parents about, How is your kid doing, are they
 9 receiving mental health help, what's their history.
 10 Parents bring us probably the best source of
 11 information we have on kids, and so we rely a lot on
 12 that information. Certainly they checked boxes about
 13 asking about some of these other pieces. The weapons
 14 question is an important question. That's one of the
 15 things we try to figure out.
 16 **Q. Right. And that box is checked none, no?**
 17 A. Correct.
 18 **Q. Okay. So wouldn't that fall squarely in**
 19 **the, This is what we don't know category?**
 20 A. Correct. Well, exactly. And I can't
 21 tell from this form, you know, what exactly that meant
 22 to them, but that would definitely fall in something
 23 we don't know.
 24 **Q. Right. And that's exactly the kind of**
 25 **information that you trained Esther to be aware of,**

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1 **right?**
 2 A. Correct.
 3 **Q. And did you have any discussions with her**
 4 **about what she did to beware of what she didn't know**
 5 **about Karl's access to weapons or his interest in**
 6 **weapons or anything like that?**
 7 A. I believe we had some conversation about
 8 it. If we did, it would have been when we met with
 9 Steve.
 10 **Q. Okay. Let's move a couple of slides**
 11 **farther into your Exhibit 4, if we could, to the**
 12 **"Early Warning Signs."**
 13 A. Okay. Yes.
 14 **Q. There you go. Now, you, as part of the**
 15 **training that is outlined in Exhibit 4, explained to**
 16 **the participants what the early warning signs were for**
 17 **school violence?**
 18 A. Correct.
 19 **Q. And some of those are listed on this**
 20 **slide, right?**
 21 A. Correct.
 22 **Q. And they're also listed in the threat**
 23 **assessment template that was in use at LPS in the fall**
 24 **of 2013, right?**
 25 A. Yes.

99

1 **Q. Is it important to check all of these or**
 2 **inquire about all of these when evaluating whether or**
 3 **not a student poses a threat?**
 4 A. The ones on this slide you're talking
 5 about?
 6 **Q. Yes.**
 7 A. Certainly we want people to be trained to
 8 be attuned to these things. We do not -- we do not
 9 train people to do this as a scored checklist. So
 10 it's not a -- you know, I know there are some models
 11 where you use a scoring checklist and you say on a one
 12 to five and you score it. And you total up, you know,
 13 how many signs are there. I think the research has
 14 borne out that that's not an effective model.
 15 What my philosophy and training is we
 16 want people to be aware of these warning signs. We
 17 train that just having one warning sign doesn't mean a
 18 kid may be going down a path to violence, but
 19 certainly the more you see, the more concerned we
 20 should be. And part of this process, as a threat
 21 assessment form, is for you to use as a reference to
 22 ask the right questions.
 23 **Q. All right. Well, let's look at the very**
 24 **first early warning sign that refers to social**
 25 **withdrawal. What kind of questions did you train**

100

1 **Esther Song or whoever else attended this training to**
 2 **ask to gather information about social withdrawal?**
 3 A. Well, we don't go through specific
 4 questions for each one of these warning signs. A lot
 5 of our mental health staff get this in their training
 6 in their programs. You know, so in general, our staff
 7 come in understanding what social withdrawal is. So
 8 we don't give them a specific template for each one.
 9 We certainly talk about what are some ways you might
 10 see that happening.
 11 You know, so, for example, How would you
 12 -- how in your school would you notice if a kid is
 13 isolating or withdrawing. Would you look at
 14 attendance, would you look at, you know, pure
 15 connections. So we train more of kind of giving
 16 examples and having them also identify what are ways
 17 that they would notice that a student is withdrawing
 18 or struggling.
 19 **Q. Well, other than telling the participants**
 20 **or the attendees at this training program to be on the**
 21 **lookout for social withdrawal, do you give them any**
 22 **guidance on how to find out whether or not a child is**
 23 **experiencing social withdrawal?**
 24 A. Well, certainly we talk about student
 25 interviews, and we talk about connecting with teachers

101	<p>1 and asking them what is their process in their 2 building. Part of this training -- again, this is the 3 spring of '11 version. It did change in the fall of 4 '11 to -- we included some more broader concepts 5 beyond just threat assessment to try to tie that piece 6 in. But this part of the training is really around, 7 you know, how are -- you know, what does this look 8 like. How would you be figuring that out in your 9 building, but it's not a -- you know, it's not a 10 question by question, Hey, are you withdrawing from 11 school, why are you withdrawing. It's more of a, How 12 would you tell a kid is withdrawing. What sorts of 13 information could you get to figure that out.</p> <p>14 Q. Right. And that's what I'm getting at is 15 what were you training Esther Song and others to do to 16 try to figure out whether a kid is experiencing social 17 withdrawal?</p> <p>18 A. Well, in that situation, I would say 19 you're looking at attendance. You're seeing if 20 there's a significant attendance difference. You 21 might look at, you know, a change in attitude in terms 22 of how they view their life. You know, they've lost 23 care about things, maybe their hygiene looks poor, 24 those are all examples.</p> <p>25 Q. Okay. Do you know whether or not Esther</p>	103	
102	<p>1 Song looked at any of those things as part of a threat 2 assessment on Karl Pierson?</p> <p>3 A. I mean, I know we had conversations, and 4 she asked questions about those in their meeting with 5 the family, but I don't know beyond that any specific 6 questions she asked.</p> <p>7 Q. Okay. And one of the things I'm getting 8 at is in your discussion of social withdrawal, you 9 mentioned one way to get to the bottom of whether or 10 not a student is experiencing social withdrawal would 11 be to speak to his teachers, right?</p> <p>12 A. Correct.</p> <p>13 Q. And that didn't happen in this case, did 14 it?</p> <p>15 A. To my understanding, it did not.</p> <p>16 Q. And it should have?</p> <p>17 A. Other than Tracy --</p> <p>18 Q. Other than Tracy.</p> <p>19 A. I can't speak to whether any other 20 conversations happened, but to my knowledge, there 21 wasn't any formal conversation about this process with 22 teachers beyond Tracy and the other teacher who was 23 involved in hearing the threat.</p> <p>24 Q. But finding out whether or not Karl was 25 experiencing social withdrawal by talking to his</p>	<p>1 teachers, other than Tracy Murphy, just didn't happen 2 here, did it, as far as you know?</p> <p>3 A. As far as I know.</p> <p>4 Q. And it should have happened, shouldn't 5 it?</p> <p>6 A. Correct.</p> <p>7 Q. And another item on this early warning 8 signs list is, "Violent expressions in writings and 9 drawings." Do you see that? It's towards the bottom 10 of the left-hand column.</p> <p>11 A. Uh-huh.</p> <p>12 Q. And, again, we now know that Esther Song 13 and Kevin Kolasa didn't do anything to find out what 14 Karl's writings in school looked like, did they?</p> <p>15 A. I can't recall if they were aware of the 16 previous incident he had. I believe at a minimum 17 Kevin was aware of the previous incidents he had had, 18 behavioral incidents, including some of his 19 expressions. I don't know about -- specifically if 20 they asked about writings or drawings.</p> <p>21 Q. Isn't that something that you trained 22 them to look into as part of having this investigative 23 inquisitive mindset that is so critical to the 24 effective performance of a threat assessment?</p> <p>25 A. Yes.</p>	104

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1 **any other LPS schools?**
 2 A. At what time frame?
 3 **Q. In 2013, prior to the shooting.**
 4 A. My understanding of -- well, I'll just --
 5 do you want me to take it one at a time, Arapahoe and
 6 other schools or --
 7 **Q. Sure.**
 8 A. So at Arapahoe, to my understanding, they
 9 were having conversations, verbal conversations, with
 10 teachers and staff and that there was ongoing
 11 conversations about here's things to be concerned
 12 about, and if you're concerned, here is how you
 13 connect them with the guidance office. I can't say
 14 that they were given specific -- I don't know whether
 15 they were given this specific information or a
 16 specific handout on warning signs of youth violence
 17 that we have.
 18 **Q. Okay.**
 19 A. At other schools, I can say some used the
 20 handout, very specifically with their staff, and
 21 others did not. In general, the practice was that in
 22 August, when they have their first teachers meetings,
 23 that there was a conversation about, you know,
 24 Safe2Tell, child abuse reporting, other concerning
 25 warning signs and what to do about it.

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1 **Q. And that was a description of the -- what**
 2 **LPS and/or Arapahoe did prior to the shooting?**
 3 A. Correct.
 4 **Q. And since the shooting, LPS has -- if I'm**
 5 **understanding correctly, LPS has instituted a more**
 6 **formal handout or training program for teachers and**
 7 **other school staff on how to recognize the early and**
 8 **imminent warning signs of school violence; is that**
 9 **right?**
 10 A. Well, we've always had the handout prior
 11 to --
 12 **Q. I'm not trying to trick you, so let me**
 13 **give you what I think is the handout.**
 14 A. Yeah.
 15 **Q. Is that the handout you're talking about?**
 16 A. Yes. This is the most recent version.
 17 There was an earlier version as well, but essentially
 18 the same thing.
 19 **Q. Okay. And this is a handout that was**
 20 **available to administrators throughout LPS or a**
 21 **version of this was prior to the shooting?**
 22 A. Yes.
 23 **Q. And it was a building administration**
 24 **level decision on whether to hand this out to the**
 25 **teachers and staff; is that right?**

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1 A. Yes.
 2 **Q. Was this handout --**
 3 MR. ROCHE: What number are we on?
 4 MR. EVERALL: You didn't mark this.
 5 MR. ROCHE: Oh, I'm sorry. Let's mark
 6 this.
 7 (Deposition Exhibit 43 was marked.)
 8 **Q. (BY MR. ROCHE) Do you know whether or**
 9 **not at Arapahoe High School this handout or it's**
 10 **predecessor was distributed to teachers and other**
 11 **staff prior to the shooting?**
 12 A. I don't.
 13 **Q. Do you know whether or not this Early and**
 14 **Imminent Warning Signs for School Violence is now**
 15 **handed out at Arapahoe High School to the teachers and**
 16 **staff?**
 17 A. I know it's been handed out the last two
 18 years.
 19 **Q. And is it handed out in conjunction with**
 20 **a training program that all the teachers and staff --**
 21 A. For the past two years -- yeah, I've been
 22 on site and helped lead that training. So at their
 23 faculty staff meetings, this has been handed out and
 24 it was handed out in 2014, and then again this fall.
 25 **Q. Okay. Have you had any conversations**

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1 **with the administrators at Arapahoe High School on**
 2 **whether something like this was handed out prior to**
 3 **the shooting, and, if not, why not?**
 4 A. I believe the conversations I had about
 5 it -- if we had conversations about it, it would have
 6 been, you know, with counsel.
 7 **Q. Okay.**
 8 A. Outside of those meetings, there probably
 9 were some -- probably had been conversations just, you
 10 know, about, you know, this form and how to access it
 11 and where to use it. You know, I may have asked
 12 Esther, you know, if she helped lead this discussion
 13 prior to 2013, but I don't recall knowing whether they
 14 specifically handed this out or it was a verbal
 15 conversation, but then guided staff to where they
 16 could find this sheet.
 17 **Q. All right. Does LPS provide any training**
 18 **to students or parents on how to recognize the early**
 19 **and imminent warning signs for school violence? And**
 20 **I'll break that into the pre-shooting period and the**
 21 **post.**
 22 A. Well, nothing in addition to what I've
 23 already told you or talked to you about already today.
 24 I can't think of anything additional other than what
 25 we've already talked about.

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1 **Q. Well, is there a -- this document,**
 2 **Exhibit 43, is obviously described as, "Reminders for**
 3 **Teachers and Other School Staff." Is something**
 4 **similar to this handed out to students or parents?**
 5 A. Not to my knowledge. We do have
 6 something that's more related to suicide that we hand
 7 out whenever kids may be struggling, and it's an
 8 advisory for parents on that. But not specific to
 9 school violence.
 10 **Q. And am I correct that the more early**
 11 **warning signs and the more severe the early warning**
 12 **signs, the greater the level of threat that a student**
 13 **is likely to pose?**
 14 A. Well, there -- again, they're not a
 15 scored metric, but I would say if you have more, then
 16 obviously we would call that a cluster of warning
 17 signs, and that could be a reason that we would be
 18 concerned. And it would elevate our concern, yes.
 19 **Q. And in Karl's case, there was certainly a**
 20 **cluster of early warning signs, wasn't there, in the**
 21 **fall of 2013?**
 22 A. You know, I think that's more of a
 23 difficult question than a yes or a no. I think he
 24 certainly had some incidents. He certainly had some
 25 behavioral incidents over the course of his three

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1 years at -- you know, four years in high school. But
 2 in terms of a cluster of warning signs, I think that's
 3 probably debatable.
 4 **Q. Well, let's -- here, I'm going to ask you**
 5 **to do something for me. I've got another copy of**
 6 **Exhibit 43. Why don't you mark for me every one of**
 7 **the either early warning signs or imminent warning**
 8 **signs that existed in Karl prior to the shooting.**
 9 A. Well, that's -- with hindsight or based
 10 on what I understand people knew at the time?
 11 **Q. Well, let's talk about what people knew**
 12 **or could have known at the time.**
 13 A. Well --
 14 **Q. Was he experiencing social withdrawal in**
 15 **the fall of 2013?**
 16 A. I don't think so.
 17 **Q. Was he feeling excessive feelings of**
 18 **isolation and being alone?**
 19 A. I don't believe so.
 20 **Q. What about an excessive feeling of**
 21 **rejection?**
 22 A. Possible.
 23 **Q. Had he been a victim of violence?**
 24 A. Not that I know of.
 25 **Q. Was it known to the school he had**

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1 **feelings of being picked on and persecuted?**
 2 A. I think we had one -- maybe once incident
 3 where he talked about feeling like people had -- maybe
 4 one or two that he had talked about feeling like
 5 people had picked on him or persecuted him.
 6 **Q. And in the fall of 2013, was he also**
 7 **demonstrating low school interest and poor academic**
 8 **performance?**
 9 A. Definitely poorer than his typical, yes.
 10 **Q. And what about any expression of violence**
 11 **in writings and drawings?**
 12 A. In terms of what was known at the time --
 13 if there was, it was a very small amount. It was more
 14 -- my understanding it was more stuff that --
 15 sarcastic kind of things.
 16 **Q. Well, one of the things --**
 17 A. And, again, some of his incidents
 18 happened over the course of years.
 19 **Q. Right. Which is itself a flag, isn't it?**
 20 A. Not necessarily, no.
 21 **Q. But it can be?**
 22 A. Well, I mean, certainly if you see a
 23 pattern that is continuing to escalate and escalate
 24 and escalate, that is concerning, but we have many
 25 kids who have had multiple incidents through the

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1 years, and that doesn't necessarily mean that they're
 2 more of a risk than another student. You know, it's
 3 just not that simple.
 4 **Q. Okay. Well, we now know that for the ten**
 5 **weeks after the threat assessment, that Karl spent a**
 6 **significant amount of time writing a very violent**
 7 **journal, correct?**
 8 A. Correct.
 9 **Q. And nobody checked his laptop, his**
 10 **tablet, or anything else where he was writing that**
 11 **journal as part of the threat assessment process or**
 12 **its follow-up, right?**
 13 A. That's my understanding.
 14 **Q. And if that had been checked, it's**
 15 **possible, at least, that those violent writings would**
 16 **have been found, correct?**
 17 A. Could be possible. I mean, I -- my
 18 understanding is that it was hidden fairly well, which
 19 when you have a student that has gone this deviant,
 20 typically they're pretty good at hiding that. But,
 21 yeah, it's possible.
 22 **Q. But, regardless, nobody from LPS looked,**
 23 **and nobody found it until after the shooting?**
 24 A. That's my understanding.
 25 **Q. Uncontrolled anger is the next early**

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1 **warning sign?**
 2 A. I mean, he --
 3 **Q. There were certainly signs of that,**
 4 **right?**
 5 A. Well, he certainly had some anger
 6 outbursts. I don't know if I would call it
 7 uncontrolled, because he certainly showed some ability
 8 to come back and collect himself and make amends. In
 9 most of those situations he -- I would say he
 10 definitely had anger outbursts. Occasionally anger
 11 outbursts.
 12 **Q. What about patterns of impulsive and**
 13 **chronic hitting, intimidating, and bullying behaviors?**
 14 A. I don't believe that would apply.
 15 Possibly intimidating, just in the way that he yelled
 16 and got upset and he felt wronged. I don't -- I'm not
 17 aware of any hitting. I don't know if I would
 18 consider it bullying behavior. I mean, some of the
 19 things he did were intimidating. That's a hard one,
 20 because it includes three things in one bullet.
 21 **Q. Right. Well, you were aware that he had**
 22 **multiple incidents of hitting other students when he**
 23 **was in elementary school?**
 24 A. I heard he had some incidents in
 25 elementary school, but I was not aware that it was

114

1 multiple.
 2 **Q. Okay. And were you -- have you heard**
 3 **that Karl was known at least by some around Arapahoe**
 4 **High School as a verbal bully?**
 5 A. I certainly heard that he was someone
 6 who, yes, used his intelligence to make people feel
 7 bad in the way that he talked, yes.
 8 **Q. So would that be an early warning sign**
 9 **that you would have checked if you were doing Karl's**
 10 **threat assessment?**
 11 A. Depending on the information I had, I
 12 mean, the difficult piece about that is how many
 13 people you interview. You know, if you interview ten
 14 people and five say, yes, he does this, and the other
 15 five say, no, he's nice. So that's always a judgment
 16 call.
 17 **Q. All right. What about a history of**
 18 **discipline problems? Would that have been an early**
 19 **warning sign that would have been --**
 20 A. I think certainly he had discipline
 21 incidents, and I think certainly that definitely
 22 needed to be considered, and the nature of his
 23 incidents should have been considered. I think one of
 24 the challenging pieces of that too is that, you know,
 25 Arapahoe had a letter from his middle school principal

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1 saying there was no behavioral concerns or history of
 2 behavioral problems when he was admitted into
 3 Arapahoe. But even the things that did happen at
 4 Arapahoe certainly would qualify as a history of
 5 discipline.
 6 **Q. All right. What about a past history of**
 7 **violent and aggressive behavior? Would that have been**
 8 **an early warning sign that you would have flagged on**
 9 **his threat assessment?**
 10 A. I think that one is another judgment
 11 call. I think certainly a couple of those incidents
 12 that are angry, you know, reactive outbursts, you
 13 could classify that way. But I think we also train
 14 folks to be careful about that piece because, you
 15 known, one angry outburst in the class doesn't
 16 necessarily mean you're an aggressive or violent --
 17 you know, having a violent or aggressive outburst. I
 18 think this would be a debatable judgment call based on
 19 the information that they have.
 20 **Q. And what about an intolerance for**
 21 **differences in prejudicial attitudes? Is that**
 22 **something that Karl displayed in the fall of 2013?**
 23 A. It probably depended on who you would
 24 talk to. I think there is probably some people that
 25 would tell you that they were concerned about -- maybe

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1 not so much differences, but, I mean, a narcissistic
 2 kind of sarcastic way of interacting with people
 3 and --
 4 **Q. He was known as Karl The Communist around**
 5 **the school?**
 6 A. Yeah, that he liked to talk about things
 7 that he knew were controversial, but I also -- I also
 8 know there was a lot of students who didn't see him
 9 that way.
 10 **Q. He had incidents of telling other kids in**
 11 **class that they were stupid that semester?**
 12 A. Yeah, I think so.
 13 **Q. Wouldn't that be a sign of intolerance**
 14 **for differences in prejudicial attitudes?**
 15 A. I don't know if it's so much for
 16 intolerance for differences, as it is being
 17 disrespectful and, you know, not caring about other
 18 people's feelings.
 19 **Q. What about any drug use or alcohol use?**
 20 A. Not to my knowledge.
 21 **Q. Do you know what, if anything, Esther**
 22 **Song and Kevin Kolasa did to find out about that?**
 23 A. Not specifically, no, other than I know
 24 that they checked his behavior history in our system
 25 and records in our system for any incidents.

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1 **Q. Okay. And no gang affiliation?**
 2 A. Not that I know of.
 3 **Q. And what about inappropriate access to**
 4 **possession of and use of firearms?**
 5 A. Well, again, I think up until -- at the
 6 point of this threat assessment meeting, people did
 7 not know that he had even had access to or let alone
 8 whether it was inappropriate if they -- you know,
 9 that's -- I mean, that's kind of a hindsight thing in
 10 how much -- whether it was inappropriate or not.
 11 **Q. All right. And what about serious**
 12 **threats of violence?**
 13 A. Certainly he had a threat of violence.
 14 **Q. And it was serious, the one against Tracy**
 15 **Murphy, right?**
 16 A. I would say, yeah, I considered it
 17 serious because he said it in a pretty intentional and
 18 angry way. We certainly have kids who make those
 19 threats, and if you've reviewed the threat
 20 assessments, you know there's a lot of very concerning
 21 and scary things that kids say and do. And that's
 22 part of our challenge is trying to sort out what's
 23 serious and what's not, but I would consider this one,
 24 yes, a serious threat.
 25 **Q. So wouldn't -- having just reviewed all**

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1 **of that, wouldn't that qualify collectively as a**
 2 **cluster of early warning signs in the fall of 2013?**
 3 A. I think that's a judgment call.
 4 Possibly.
 5 **Q. And I'm asking your judgment.**
 6 A. It's very hard to say that with the
 7 hindsight that we have. I think if I -- you know, at
 8 the time, if I was sitting in that meeting, there
 9 certainly would be more reason to ask more questions
 10 with the pieces that are there. But I would also say
 11 it's not unusual that a situation similar to this
 12 would come out with a low level of concern based on
 13 the information that was there, and the information
 14 that was used to make that decision.
 15 **Q. All right. Now, in looking at**
 16 **Exhibit 38, we talked about some of these principles,**
 17 **and one of them that "Effective threat assessment is**
 18 **based on facts rather than on characteristics or**
 19 **'traits'", correct?**
 20 A. Yes.
 21 **Q. And one of the things that you cover in**
 22 **your training is the different sources of information**
 23 **that the team should look at, right?**
 24 A. Sure.
 25 **Q. And that's --**

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1 A. Do you know what the slide looks like?
 2 What the title is?
 3 **Q. It's 00499.**
 4 A. Yes.
 5 **Q. Okay. And that includes, "Past and**
 6 **present school records," right?**
 7 A. Correct.
 8 **Q. Do you know whether or not those sources**
 9 **-- that source was looked at, Karl's past and present**
 10 **school records?**
 11 A. Well, that would have been in the
 12 conversations that were with Steve.
 13 **Q. Okay. Well, I'm not asking what you and**
 14 **Steve discussed. I'm asking whether or not you know**
 15 **Esther Song and Kevin Kolasa looked at Karl's past and**
 16 **present school records as part of the threat**
 17 **assessment?**
 18 A. I guess my basic understanding is that
 19 they did review what records we have. I don't know if
 20 they looked at any other records.
 21 **Q. So they looked at his Arapahoe records?**
 22 A. That's my understanding.
 23 **Q. And at least part of those records were**
 24 **incomplete or inaccurate in that his behavioral detail**
 25 **log did not show the fact that he had been suspended**

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1 **the previous year; is that right?**
 2 A. For which incident are you talking about?
 3 I'd probably have to look at it to --
 4 **Q. Sure. The one I'm referring to is the**
 5 **March of 2013 incident in Dan Swomley's class.**
 6 A. Right. Okay.
 7 **Q. So do you know whether or not Esther Song**
 8 **was aware that Karl had previously been suspended for**
 9 **an angry outburst in the class?**
 10 A. No, I don't know specifically.
 11 **Q. And one of the things that you trained**
 12 **your folks to look at as a source of information was**
 13 **internet, written, and artistic materials, right?**
 14 A. Correct.
 15 **Q. And that would include things like a**
 16 **kid's Facebook page, Twitter account, those types of**
 17 **things?**
 18 A. Depending on the situation, yeah, we
 19 don't say, you know, You have to do every one of these
 20 in every situation, it kind of depends on the
 21 situation, but certainly if there's a significant
 22 concern that there would be something there within
 23 reasonable suspicion, you know, we have those options.
 24 **Q. Well, you don't need reasonable suspicion**
 25 **to look at a kid's Facebook, do you?**

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1 A. Well, not if it's public.
 2 **Q. Right.**
 3 A. Right. If it's public, we wouldn't have
 4 -- we could certainly go on there and look if we
 5 wanted to, or in some cases we ask students to log in
 6 and show us either a victim or a, you know, student
 7 themselves.
 8 **Q. Did that happen in Karl's case?**
 9 A. Not to my knowledge.
 10 **Q. Do you know why not?**
 11 A. No.
 12 **Q. Do you know if anybody checked whether or**
 13 **not Karl had any law enforcement contract or criminal**
 14 **history?**
 15 A. I know I've had some conversation with
 16 James Englert about that, but I can't recall whether
 17 he specifically checked that before or after. So, no,
 18 I can't answer that.
 19 **Q. Okay. Is that something that, given the**
 20 **threat to kill Tracy Murphy, you would have expected**
 21 **somebody from the school to investigate as part of**
 22 **this threat assessment?**
 23 A. In this situation, we have a student
 24 who's admitting that he said it, so maybe not so much.
 25 I mean, we might ask them to do it just as a way to

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1 verify if there is any specific plans or details that
 2 we could find. So that would be -- you know, in this
 3 case, we don't need to verify that the kid made the
 4 threat because the kid admitted it. So I think it
 5 would be more about finding any other details or
 6 information. That would be the purpose of that.
 7 **Q. Right. And speaking of verifying, we'll**
 8 **go off on a little tangent here. Does LPS do anything**
 9 **or has LPS done anything to verify or validate that**
 10 **this threat assessment template was effective in**
 11 **either preventing violence or making sure that**
 12 **students who need help get the help they need?**
 13 A. You mean like a research study?
 14 **Q. Whatever it may be.**
 15 A. No. We haven't engaged in any research.
 16 Certainly we do continuous monitoring and improvement.
 17 I mean -- so part of my job is to look at where our
 18 students are over the course of time. I can tell you
 19 that the vast majority of these kids graduate and have
 20 not conducted violence. You know, in terms of just
 21 basic, those kind of outcomes. But, no, we don't have
 22 specific control group research or -- you know, we
 23 haven't done focus groups or surveys with families who
 24 have been through this or anything like that.
 25 **Q. Do you track what percentage of students**

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1 **who are the subject of a threat assessment graduate?**
 2 A. Yeah, in general, we do. I mean, we've
 3 been keeping records since I started in '09-'10, and,
 4 I mean, I can't pull them out off the top of my head,
 5 but I would say it's the vast majority. I would say
 6 90 to 95 percent graduate successfully.
 7 **Q. And do you track what percentage of the**
 8 **students who are the subject of a threat assessment**
 9 **have subsequent behavioral issues, suspensions,**
 10 **expulsions, law enforcement problems?**
 11 A. Prior to graduating or after?
 12 **Q. Either.**
 13 A. Definitely we don't after, unless we hear
 14 something in the news or, you know, there is something
 15 involved with one of our current students. In terms
 16 of currently, yeah, we do a -- we have a district
 17 review process now, which is new in the last year, but
 18 even prior to that, certainly we had those kids on a
 19 running list, and a spreadsheet in my office that we
 20 tracked suicide threat assessment, that we could then,
 21 at any given time say, you know, this kid has now had
 22 three threat assessments or two suicide assessments
 23 and a threat assessment, and we've seen that they've
 24 now had two behavioral incidents. We don't have a --
 25 we don't produce a summary that says, okay, we have 20

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1 kids that did a threat assessment, and five of those
 2 have had this kind of an incident and six have had
 3 this.
 4 **Q. Okay.**
 5 A. We just haven't been in the places of
 6 that in depth of research yet, but it's doable.
 7 **Q. All right. Let's come back from that**
 8 **tangent and go back to your sources of information**
 9 **that --**
 10 A. Do you mind if we take a break?
 11 **Q. Why don't we take a lunch break. That's**
 12 **totally fine.**
 13 **(Recess taken, 12:11 p.m. to 1:04 p.m.,**
 14 **after which time Ms. Kanan was no longer present on**
 15 **the phone.)**
 16 MR. ROCHE: Back on the record.
 17 **Q. (BY MR. ROCHE) We're going to jump**
 18 **around a little bit. Do you mind taking another look**
 19 **at Exhibit 43?**
 20 A. Sure.
 21 **Q. And that is the Early and Imminent**
 22 **Warning Signs training document or reminder**
 23 **document --**
 24 A. Sure.
 25 **Q. -- that LPS uses, correct?**

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1 A. Correct.

2 **Q. One housekeeping item is, can you tell**

3 **me, as part of the training that LPS provides to its**

4 **mental health staff and its teachers, do you provide**

5 **any behavioral anchors for each of these early warning**

6 **signs?**

7 A. Can you tell me what you mean by

8 "anchor"?

9 **Q. Sure. A behavioral anchor, meaning what**

10 **guidelines as to what kind of conduct would justify**

11 **marking one of these early warning signs?**

12 A. We don't -- I mean, we don't provide a

13 chart that says, okay, here's five things that you can

14 measure social withdrawal with, but we talk about

15 these. And so I think one of the challenges in a

16 document like this is there's a lot of things that

17 could indicate social withdrawal. Some probably more

18 static than others, some more dynamic than others. So

19 I think you have to talk about it in terms of, you

20 know, what this might look like and things you can

21 observe in your role. But it's -- we don't have any

22 written document that goes any farther than this. I

23 mean, not in this area. I mean, there's certainly --

24 you know, with students who are on an IEP and a

25 specific behavior plan, we have some more functional

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1 behavioral assessments and things like that that go

2 deeper --

3 **Q. Okay.**

4 A. -- in terms of measuring, but not as a

5 part of this, we don't have any additional documents.

6 **Q. Okay. And let me ask you to jump back a**

7 **little bit, and I'm still on Exhibit 4. And there's a**

8 **slide about, "Warning Signs Training." Do you see**

9 **that?**

10 A. Yes. Yes.

11 **Q. And one of the things that you instruct**

12 **the folks who attend this training is that there**

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

14 **recognize warning signs and what to do, correct?**

15 A. Correct.

16 **Q. And, as I understand it, it was a**

17 **building level decision whether or not to perform that**

18 **annual training?**

19 A. Well, I would say it was an expectation

20 when they were trained in this that their building is

21 doing it. There's not a policy that backs that up,

22 but it was an expectation that this was a best

23 practice for every building to be doing, and these

24 were the bullet points.

25 **Q. Do you know, had Arapahoe High School**

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1 **performed annual training on the early and imminent**

2 **warning signs in the 2013-2014 school year before the**

3 **shooting?**

4 A. I mean, I think I said everything earlier

5 that I'm aware of. My understanding is that they had

6 conversations with teachers and staff in staff

7 meetings. In a general way, I'm not sure if they were

8 handing out the actual -- this actual handout. I do

9 know that there was quite a bit of conversation, and I

10 can't remember exactly when the date was that they

11 started putting Safe2Tell, you know, as part of

12 student ID's and regular conversation. But I -- my

13 understanding is that it was more of a verbal

14 training.

15 **Q. Okay.**

16 A. I can't answer if they handed out this.

17 **Q. And whose job was it to make sure that**

18 **annual training in each of the buildings occurred?**

19 **Did that fall under your responsibility or under each**

20 **principal's responsibility or somewhere else?**

21 A. I would say I'm the district

22 representative that works with the buildings to make

23 that happen. Ultimately it comes down to the building

24 administrative team.

25 **Q. And did you do anything to verify whether**

128

1 **or not the various buildings performed this annual**

2 **training on how to recognize the warning signs and**

3 **what to do if they saw them?**

4 A. Typically, that would happen as a part of

5 this training. So when the administrators came to my

6 training, one of the breakout discussions we would

7 have is, How are you doing in this new building, what

8 pieces are you missing or not missing. But we did not

9 have them turn in a sheet or anything that says, hey,

10 here is the date we did it. There may be a piece of

11 that that our security department followed up on as

12 well. Back then -- I couldn't say exactly what was

13 happening back then from the security department. But

14 ultimately it was conversations -- we also had some --

15 I went into the principals' meetings at numerous

16 times, either the high school principals or middle

17 school principals and talked about this.

18 **Q. And one of the things on the warning**

19 **signs training slide emphasizes the importance of**

20 **having the administrators be present and supportive**

21 **for the training on the warning signs, right?**

22 A. Correct.

23 **Q. And was it a requirement for school**

24 **administrators to participate in that warning signs**

25 **training?**

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1 A. Well, I'm trying to figure out what you
 2 mean by "requirement," but I guess I would say it was
 3 a loose guideline and expectation, yeah. It wasn't
 4 something that was on their evaluation specifically
 5 that I know of.

6 **Q. Do you know whether or not Natalie**
 7 **Pramenko ever participated in any training on early**
 8 **warning signs and imminent warning signs of school**
 9 **violence?**

10 A. At my trainings or at Arapahoe?

11 **Q. The trainings that are described on this**
 12 **slide.**

13 A. My understanding is that she was
 14 definitely part of the conversations that they had
 15 with their whole staff, the staff and faculty
 16 meetings.

17 **Q. And I'm not asking about conversations**
 18 **with staff and faculty. I'm asking about training.**

19 A. Well, again, I think the way that I
 20 define training is probably a different way than
 21 you're looking at it. The way I define training is if
 22 you have a set curriculum that you're going through
 23 with either students or staff, here is the curriculum,
 24 and then reviewing that. And maybe -- maybe that's a
 25 confusion in the term. What this really refers to is

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1 that you're having a conversation, and when we say
 2 training, basically is do people know this. Are
 3 people aware of these things and what to do if they
 4 see them and are concerned about them. And so some
 5 schools did it in a way of handing this out and
 6 talking about it. Other schools did it in a way of
 7 verbal reminders from their mental health staff and
 8 administrators every year saying as a reminder, Here's
 9 the things we're looking for and what to do about it.

10 **Q. But if it's important for the**
 11 **administrators to be present and supportive in making**
 12 **the faculty and staff aware of these early warning**
 13 **signs, my question is, do you know whether or not**
 14 **Natalie Pramenko participated in any such training on**
 15 **the items on Exhibit 43?**

16 A. I'm getting confused about -- what do you
 17 mean by her participating in a training? Do you mean
 18 her leading a training at her school or coming to my
 19 threat assessment training?

20 **Q. Well, was she present and supportive at**
 21 **any annual training for all staff on how to recognize**
 22 **warning signs, threat, suicide, et cetera, and what to**
 23 **do about them?**

24 A. Well, I guess what I would say with that
 25 is in those verbal conversations, my understanding is

131

1 that Arapahoe did this in a verbal way in their
 2 faculty staff meetings at the beginning of every
 3 school year. And typically the principal is at those
 4 -- I mean, I can't verify her attendance at her own
 5 meeting, staff meetings, but other than the ones that
 6 I was at.

7 **Q. Okay. I assume the same is true for**
 8 **Kevin Kolasa?**

9 A. Correct.

10 **Q. You assume he was at verbal conversations**
 11 **at the beginning of the school year that discussed a**
 12 **variety of topics and that may have included the early**
 13 **warning signs?**

14 A. Yes.

15 **Q. But you're not aware of any specific**
 16 **training programs that he participated in on how to**
 17 **evaluate whether or not a student's behavior reflect**
 18 **any of those early warning signs beyond those**
 19 **conversations?**

20 A. Not other than participating in my
 21 trainings that I did.

22 **Q. Okay.**

23 A. And we talked about that.

24 **Q. Now, one of the other things that you**
 25 **teach as part of the training program that we're**

132

1 **discussing is that it's important to share the signs,**
 2 **the early warning signs and reporting procedures with**
 3 **students and parents annually, right?**

4 A. Correct.

5 **Q. Why is that important?**

6 A. For what we've already talked about, is
 7 we want everybody in the community to know what to do
 8 if they have a concern.

9 **Q. Okay. Did you or anybody from LPS ever**
 10 **distribute to students and parents the early warning**
 11 **sign list or something like that to the parents?**

12 A. Not districtwide that I know of.

13 **Q. To your knowledge, did Arapahoe High**
 14 **School ever distribute anything like that to the**
 15 **students and parents annually?**

16 A. Not that I know of.

17 **Q. Are you aware of any person,**
 18 **organization, office, school, anybody within the**
 19 **entire LPS universe that shared the early warning**
 20 **signs and reporting procedures with students and**
 21 **parents on an annual basis?**

22 A. No, not on an every year basis. There
 23 could have been schools who have shared that with
 24 family members, but it was not an expectation of ours
 25 to send this document out to families and students

133

1 specifically.

2 **Q. Then why isn't it in this training slide**

3 **that you prepared?**

4 A. We have that conversation with students

5 in a different way. So, obviously, this isn't

6 necessarily the best way to share with a student or a

7 parent. This is designed for teachers and staff. So

8 what we really encourage schools to do is to use ways

9 that are natural ways that they teach kids already.

10 Like I mentioned before, either in their core class or

11 their advisory class or homeroom class. Sometimes

12 it's part of assemblies or orientation processes, and

13 that's a much better way to help kids learn than

14 necessarily giving them a sheet that says, If you see

15 these things, call Safe2Tell.

16 **Q. Well, let me make it real specific. You**

17 **know me, I am an Arapahoe parent. You know my**

18 **daughter, she was an Arapahoe student. What did LPS**

19 **do to share with me and my daughter the early warning**

20 **signs of school violence and the reporting procedures**

21 **for them? We were there four years.**

22 A. Well, again, I think that would have to

23 go back to specifically what was offered at Arapahoe,

24 and I --

25 **Q. That's what I'm asking.**

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1 A. And, you know, I can't pull off the top

2 of my head, Here's the different ways. I do know that

3 -- again, I don't know exactly what year she started

4 there, but I do know that there was significant

5 conversations with families about mental health after

6 the time of the suicides that occurred in, I believe

7 it was, 2010, and opportunities for families to have

8 input. And we had some conversations, not necessarily

9 specifically about this, but there was an invitation

10 to all parents that evening to come talk about mental

11 health and --

12 **Q. Right. But that was about suicide. That**

13 **wasn't about targeted school violence --**

14 A. Right.

15 **Q. -- which is what this is about.**

16 A. Yeah.

17 **Q. So you're answering a different question**

18 **from the one I asked.**

19 A. Well, those are also very closely linked.

20 And so to my knowledge, the district has never sent

21 this document out to students and parents, if that's

22 what you're asking.

23 **Q. Well, I guess what I'm asking now is, why**

24 **not? Why isn't LPS doing anything beyond what you've**

25 **just described to share the signs of targeted school**

135

1 **violence and the reporting procedures for those signs**

2 **with students and parents annually?**

3 A. I think one of the challenges we have in

4 the schools is thinking about the big picture of all

5 of the different things we deal with. So certainly

6 school violence is one of those, and threat

7 assessments is one of those things that we do. But we

8 do have a bigger picture, which is, you know, just

9 troubled youth child abuse and, you know, general

10 truancy issues. And so if we were to do something

11 like that, my thought would be that it would have to

12 be in a more broad way and not just sending out, okay,

13 here's the warning signs of school violence.

14 I think to be real honest it's -- there

15 is a broad range of parent responses when you send out

16 things like these, and I think it's a challenge for a

17 school district to think about what communication do

18 you put out to all parents in just a mass e-mail,

19 versus the other venues that you have. So, you know,

20 I mean, I guess that's the best answer I have. It's

21 just been a decision that the district has made that

22 this is not something to be -- this specific document

23 would be shared.

24 **Q. And who at the district made that**

25 **decision, based on all of the big picture concerns you**

136

1 **just described?**

2 A. Well, I think anything that goes out to

3 all -- districtwide, to any parent or student in the

4 district has to go through kind of your executive

5 leadership team, learning services team, all of the

6 directors basically that are involved. So, I mean,

7 that group ultimately would be deciding what goes out

8 to all staff or not. But, I mean, I guess I would say

9 part of that falls on me, you know, that decision

10 making. You know, it's not something that we did.

11 And part of that decision would be mine, I guess.

12 **Q. Well, what I'm trying to get at here is**

13 **you train your people on one thing, and you do**

14 **another, is what it sounds like to me. And I'm trying**

15 **to understand why that is. Because at the top of this**

16 **slide, it says you're going to have annual training**

17 **for all staff, and what I've heard is there are verbal**

18 **conversations about that. And at the bottom of the**

19 **slide, it says you're going to share these early**

20 **warning signs and reporting procedures with students**

21 **and parents annually. And what you're telling me is**

22 **that doesn't happen either. And I'm trying to**

23 **understand why those things don't happen the way**

24 **they're described on the slide that I'm looking at?**

25 A. I guess what I would say is there are

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1 different ways that those things get shared, not in
 2 the way of sending out this particular document. So,
 3 for example, Safe Schools Month is a time when we
 4 promote that districtwide. It goes home in
 5 newsletters. It goes home in -- you know, in terms
 6 of, Hey, this is what Safe Schools Month is about,
 7 these are the ways that everybody can keep schools
 8 safe. Here is how you report. Does that make sense?
 9 **Q. And I understand that. I'm really trying**
 10 **to focus in on the discrepancy between what you**
 11 **trained Esther Song and others to do, and what you are**
 12 **actually doing and whether or not you can explain**
 13 **that?**
 14 A. You know, I mean, I can -- I'm doing the
 15 best I can to explain it. I think you would have to
 16 ask some of those specific administrators their
 17 decision making on that piece.
 18 **Q. Okay. The next slide after the warning**
 19 **signs training talks about, "Turn and Talk." Look**
 20 **through items 1 and 2 on the team implementation plan,**
 21 **and do your students understand how to report and when**
 22 **to report danger? Are your staff trained to recognize**
 23 **and respond to warning signs? Tell me about this part**
 24 **of your presentation.**
 25 A. Well, this is basically where the teams

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1 who have come to the training, whether they're with
 2 their team or they're with someone from another
 3 school, sit down and have that conversation. And it's
 4 talking about some of the very things that you and I
 5 are talking about right now, which is basically how
 6 are you getting information out to staff and to
 7 students and giving them an opportunity to have some
 8 discussion about that.
 9 **Q. And when the different groups of school**
 10 **administrators or mental health professionals sit down**
 11 **and talk through this part of the presentation, do you**
 12 **do anything to learn from them whether or not their**
 13 **answers to these questions are satisfactory to the**
 14 **district or not?**
 15 A. Well, we use it as more of a learning
 16 opportunity. I mean, I don't ask them, Write those
 17 things down or make a report. And, again, this
 18 training happened about two-and-a-half years into us
 19 starting this process. So, again, we're in a training
 20 process where some schools had just started doing this
 21 in the last couple of years and are really trying to
 22 learn the process.
 23 **Q. Sure.**
 24 A. And at this point, we're trying to get
 25 them to have a conversation about how is this working

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1 in your building, and when are you making time for it.
 2 So the training approach is really to help them
 3 understand, this is a best practice. Again, it's --
 4 part of the challenge for school districts is this
 5 isn't legislatively required, and how do we implement
 6 this best practice within our district. And so this
 7 is a conversational piece to help them be figuring out
 8 how they're going to implement that in their building.
 9 **Q. As part of the presentation that we're**
 10 **looking at, this whole training program, did the**
 11 **participants conduct any mock exercise or role-playing**
 12 **on how a threat assessment would actually look or be**
 13 **performed?**
 14 A. As a part of this training in '11,
 15 probably not specific breakout role-plays. They would
 16 be something more like I might do a situational
 17 role-play as a part of the training saying, Okay, I'm
 18 a student whose done this, you know, what would you
 19 ask me. But it wasn't like, okay, we're now going to
 20 everybody go break out and do a -- we do have more of
 21 those in our updated training.
 22 **Q. All right. All right. Let's go back to**
 23 **the Sources of Information slide, and I apologize for**
 24 **jumping around. The other way. It's just past the**
 25 **Infinite Campus slides. There you go. We've talked**

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1 **about the first three bullet points of sources of**
 2 **information that participants in a threat assessment**
 3 **could look at to gather information, right? The next**
 4 **one of the list is to search a student and that**
 5 **student's locker and/or car, right?**
 6 A. Uh-huh.
 7 **Q. Why is that important?**
 8 A. Well, if you have reason to believe that
 9 there could be evidence there or additional, you know,
 10 unsafe items -- typically, that's the biggest concern
 11 is they may have something unsafe that we need to be
 12 aware of.
 13 **Q. And that did not happen in Karl Pierson's**
 14 **case, correct?**
 15 A. Not to my knowledge.
 16 **Q. Same thing with respect to searching a**
 17 **student's room or home, that is an option that the**
 18 **school has?**
 19 A. Typically that's not us doing that
 20 search. That would be law enforcement --
 21 **Q. Correct.**
 22 A. -- working with the family.
 23 **Q. But school can certainly request and has**
 24 **in certain cases requested that the parents permit law**
 25 **enforcement to come and search a student's room or**

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1 **house, right?**
 2 A. Yes.
 3 **Q. That's done when there is -- I guess --**
 4 **well you tell me, when would the school ask for law**
 5 **enforcement to go and search a student's room or home?**
 6 A. Typically the conversation is around
 7 weapons or concern about weapons, and so we would work
 8 with law enforcement to say do we feel like at this
 9 time it's appropriate to go ask the family to do a
 10 weapons check at home. In certain cases if there's
 11 reason to believe that there is imminent danger, they
 12 would get a warrant and do that. Most of the time it
 13 is what we would call kind of a knock and talk or
 14 where they ask the family, Can we come to your home,
 15 look for weapons, if you do have weapons, make sure
 16 they're secure and search your student's room if
 17 they're agreeable to that. So the vast majority of
 18 the time it's with parent agreement.
 19 **Q. Do you know whether Esther Song and Kevin**
 20 **Kolasa asked Mrs. Pierson whether or not it would be**
 21 **permitted for law enforcement to come and search**
 22 **Karl's room or her home?**
 23 A. I don't know if they asked that specific
 24 question.
 25 **Q. Do you know whether or not the school or**

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1 **any law enforcement searched Karl's room or home prior**
 2 **to the shooting?**
 3 A. To my knowledge, there was not a search,
 4 just based on what I've read.
 5 **Q. Given that the threat assessment that was**
 6 **done involved the threat to kill a teacher in**
 7 **conclusion that there -- that Karl had a significant**
 8 **history of violent behavior towards others and**
 9 **long-standing self-reported deep-seated anger issues,**
 10 **wouldn't it have been appropriate for the threat**
 11 **assessment team to request a search of Karl's room or**
 12 **home?**
 13 A. Not necessarily. I mean, I think that's
 14 more of kind of a legal call. In some cases, that
 15 would be appropriate. Typically our school staff rely
 16 on our law enforcement to help guide us on that one.
 17 **Q. Did anybody ask law enforcement for**
 18 **guidance on whether or not it was appropriate to**
 19 **request a search of Karl Pierson's room or home?**
 20 A. I don't know if that specific request was
 21 made or not.
 22 **Q. Let me ask it this way. This is your**
 23 **presentation. What did you teach Esther Song and the**
 24 **other participants about when to consider or request a**
 25 **search of a student's room or home?**

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1 A. Typically in the training what I say to
 2 folks is if there is a hint of a weapon, if we have
 3 reason to believe that this kid has a weapon, if we
 4 heard rumors that the kid has a weapon, if the parents
 5 say, Yes, we have weapons in the home, he knows how to
 6 use them, that that's typically an absolute. That we
 7 then want to do a check in the home. And certainly if
 8 we have a kid who is making threats with a weapon or
 9 about a weapon.
 10 In cases like these, it's a little more
 11 questionable of a call and that's why we have --
 12 ideally want to have a conversation with law
 13 enforcement to decide, do we have enough at this point
 14 to request that. In this case, what I would say is
 15 law enforcement would probably have said, We can go
 16 ask them, but we can't -- they probably -- my guess is
 17 they would not have been able to get a warrant to do
 18 it in this case if the family refused.
 19 **Q. But in this case, as far as you know,**
 20 **that request was never made and that consultation with**
 21 **law enforcement never occurred, did it?**
 22 A. As far as I know. All I know is -- you
 23 know, it says unknown access to weapons. I believe
 24 there was a question asked of the family about
 25 weapons, but I don't recall what the answer was to

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1 that.
 2 **Q. There was a student interview performed**
 3 **-- I'm going back to your slide -- right?**
 4 A. As a part of the -- I know that there was
 5 a student interview performed as a part of that
 6 reentry meeting.
 7 **Q. And there was also parent interviews done**
 8 **as part of that reentry meeting?**
 9 A. That's my understanding.
 10 **Q. As part of your training with this slide,**
 11 **do you give the participants in that training, like**
 12 **Esther Song, specific guidance on what to ask in the**
 13 **parent interview?**
 14 A. You know, we've had sample questions, you
 15 know, here's some sample questions that you can ask.
 16 We talked to them about referring to the form, not
 17 using the form as necessarily a check box question and
 18 answer, but we have provided sample questions.
 19 They're not required because every situation is
 20 different. We typically make sure that the concept is
 21 that we need to get as much information as we can,
 22 especially related to the specific threat or, you
 23 know, the thing we're concerned about, but also just
 24 in addition to the perception of how their kid is
 25 doing.

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1 **Q. And how are those sample questions**
 2 **provided to the attendees at these training sessions?**
 3 A. You know, through the years we've
 4 provided more and more. I can't remember exactly what
 5 was in the -- it might have been in the stuff we
 6 provided, exactly which samples we used at this time.
 7 Right now, we're -- our most updated version came from
 8 Dewey Cornell out of Virginia Youth Violence Project.
 9 A lot of districts in Colorado have kind of gone to
 10 those as samples, but, again, you know, even those are
 11 not super comprehensive for every situation.
 12 So you have to coach people that you
 13 can't just -- we really don't want people using a set
 14 list of interview questions, because then people stick
 15 to that list of interview questions, and they don't
 16 necessarily follow up and ask more about other things
 17 that they might have asked. So part of the training
 18 really is this is an art form, and the main skill we
 19 want from people is to engage with the kid and engage
 20 with the family so that we can get as much information
 21 as possible and really feel like, you know, we know
 22 what's going on for that kid.
 23 **Q. Well, what I'm trying to get at -- and**
 24 **agree, I don't think you can give a list of six**
 25 **questions or ten or a hundred questions to a school**

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1 **psychologist and say, if you ask all of these, then**
 2 **you'll know everything you need to know about this**
 3 **kid. I'm just trying to get to what, if any, guidance**
 4 **you gave beyond interviewing the parents as part of**
 5 **this training module?**
 6 A. You know, again, I think it's really
 7 trying to provide some examples. You know, so
 8 throughout the training, we talked about examples of,
 9 you know, Here's this kind of a situation, here's some
 10 things you might ask. So we go through, Okay, if
 11 there is report of a weapon, what kind of questions do
 12 we ask the parents about that. How do you lead into
 13 that in a way that doesn't make the parents
 14 immediately get defensive. You know, for example,
 15 Does your family hunt, does your kid know how to hunt,
 16 have access to any weapons. That's a way you lead
 17 into the question as opposed to saying, Does your kid
 18 have any guns, do you have any guns.
 19 **Q. Sure.**
 20 A. So it's that kind of a training process.
 21 **Q. Right. That's because the key is to get**
 22 **to the bottom of the information you need to learn to**
 23 **make a well-founded assessment of what level of threat**
 24 **this kid possesses, right?**
 25 A. Correct.

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1 **Q. So, for instance, on the Karl Pierson**
 2 **threat assessment, both Mrs. Pierson and Karl had**
 3 **reported that he had had deep-seated anger issues for**
 4 **a while. What kind of follow-up would you expect to**
 5 **occur once that's reported?**
 6 A. I would expect that our staff work
 7 collaboratively with the family, and whoever the
 8 private therapist would be, to come up with a plan to
 9 how we're supporting him. And that could be if he is
 10 going to private counseling, that we ask for
 11 permission to talk with them so that we can share
 12 information and share how -- you know, can we be
 13 supportive at school. We can share, if this happened
 14 at school today, we're going to report it to the
 15 private therapist. We ask parents to continue to also
 16 report any information to us. That's typically one of
 17 the hardest parts of the process is, you know, parents
 18 sharing with us stuff that's happening outside of the
 19 school.
 20 So there is kind of a triangulation there
 21 that we try to achieve to, you know, figure out the
 22 best way to continue supporting this kid. It might
 23 include, hey, does this private therapist address
 24 anger management in their therapy. You know, is that
 25 something they're talking about or is that about a

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1 whole different topic. You know, is it about other
 2 family issues. Having that conversation allows them
 3 to understand, wow, anger needs to be a focus.
 4 **Q. Do you know, did Esther Song or Kevin**
 5 **Kolasa ask any of those questions of Karl Pierson's**
 6 **parents?**
 7 A. My understanding is that they did. I
 8 don't -- I mean, I don't know specifically. I mean,
 9 some of the conversations we had were, you know,
 10 obviously with Steve, the majority of our
 11 conversations about that.
 12 **Q. And I don't want to know about your**
 13 **conversations with Steve. I'm asking at this point**
 14 **now just what you know, not what you said to Steve or**
 15 **what Steve said to you.**
 16 A. Could you say that question again then?
 17 **Q. Sure. You walked through a bunch of**
 18 **different follow-up approaches that might be**
 19 **appropriate once a student like Karl Pierson and his**
 20 **mother report deep-seated anger issues. For instance,**
 21 **one was, Mom, will you reach back out to the school**
 22 **and tell us if you see further manifestations of those**
 23 **anger issues, right, that would be an example of a way**
 24 **to follow up?**
 25 A. That is an example.

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1 **Q. Do you know, did either Esther Song or**
 2 **Kevin Kolasa ask Mr. or Mrs. Pierson, Tell us if you**
 3 **see anything else that manifests that anger?**
 4 A. My understanding is that that was talked
 5 about in the reentry meeting when they went through
 6 the threat assessment, but, I mean, I don't have
 7 specific statements or I don't know exactly what was
 8 said.
 9 **Q. Okay. Now, let's talk about the next**
 10 **source of information that you teach people to utilize**
 11 **in performing a threat assessment, and that is**
 12 **interviews with staff, witnesses, and peers. Do you**
 13 **see that?**
 14 A. Uh-huh.
 15 **Q. I know that Kevin Kolasa spoke with Tracy**
 16 **Murphy and with Mark Loptien about the threat that**
 17 **Karl expressed. Do you know, did either Kevin Kolasa**
 18 **or Esther Song interview any other people as part of**
 19 **this threat assessment?**
 20 A. Are you talking prior to the reentry
 21 meeting?
 22 **Q. Yes.**
 23 A. Not to my knowledge.
 24 **Q. Did either of them or anybody else within**
 25 **LPS speak to any of Karl Pierson's peers as part of**

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1 **the threat assessment and reentry process?**
 2 A. I don't believe that Kevin or Esther
 3 spoke with Pierson -- Tracy Murphy might have.
 4 **Q. Why do you train the counselors and**
 5 **mental health professionals within LPS to interview**
 6 **peers as part of a threat assessment process?**
 7 A. Well, one clarification I want to make is
 8 that at this time and this training, again, these are
 9 sources of information. They're not required sources
 10 of information. So we weren't training people that
 11 you had to do every single one of these bullets.
 12 These are options based on the situation, sources of
 13 information that you can use to gather.
 14 Now, certainly we've provided more
 15 detailed guidance, now we have some more guidelines
 16 that I can tell you about, but at this time, these are
 17 ways that you can gather information. And peers would
 18 be one way that you can corroborate. So if you have a
 19 student who says, you know, I didn't do that, or, you
 20 know, you can talk to a peer who may have that
 21 information, and they may say, Yes, I did see him do
 22 that through, you know, their interview.
 23 Typically, we are very careful about how
 24 we pull in other peers, for a couple of reasons. One,
 25 because of confidentiality, and we don't want kids to

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1 know that another kid is going through a process if
 2 they don't need to know. And, two, sometimes kids
 3 don't -- I guess kids don't know what their role is in
 4 that process, and they're very concerned that they're
 5 going to get somebody in trouble. So obviously it's a
 6 good source of information if you -- if you have kids
 7 who witness something, if kids, you know, maybe have
 8 heard something or told something, but it is something
 9 you have to be very careful about. You can't just
 10 say, I want to take ten kids, random kids that know
 11 this kid and interview them. I don't know if that
 12 makes sense, but . . .
 13 **Q. So what guidance do you provide to your**
 14 **school psychologists, counselors, and administrators**
 15 **about what circumstances are appropriate to interview**
 16 **peers? Is it just when those kids are eyewitnesses or**
 17 **ear witnesses to the incident giving rise to the**
 18 **threat assessment?**
 19 A. Certainly that would be one case.
 20 Typically what we tell them is when we believe that
 21 they may have information, and we have reason to
 22 believe that they would have information that would be
 23 significant in this situation to help us make that
 24 determination, and sometimes if we're not sure. The
 25 scope of these threat assessments, again, cover a

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1 really broad range of things, and in a lot of
 2 situations, we have kids who are denying that they
 3 made a threat or denying that they did something. And
 4 so that is a part of it is sometimes corroborating,
 5 you know, what happened.
 6 So there -- you know, there's no hard and
 7 fast guidelines about you have to do it in this
 8 situation or you don't have to. Other than certainly
 9 with discipline, if you're going to be applying
 10 discipline and the kid is denying that they did
 11 something obviously for us to have some documentation
 12 that there is witnesses that said they did this or,
 13 you know, had the dangerous item or whatever that
 14 you're disciplining them for.
 15 **Q. Okay. And the next item on your sources**
 16 **of information is to interview the targeted**
 17 **individual. That happened in this case, right?**
 18 A. Yes, that's my understanding.
 19 **Q. And then the final source of information**
 20 **is to contact other community agencies, right?**
 21 A. Yes, if applicable.
 22 **Q. And do you know whether or not any other**
 23 **community agencies were contacted in the case of Karl**
 24 **Pierson's threat assessment?**
 25 A. Just the Arapahoe Sheriff.

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1 **Q. And that was Deputy Englert?**
 2 A. That's my understanding.
 3 **Q. Let's jump ahead to the slide that**
 4 **differentiates between making and posing a threat.**
 5 A. Sure.
 6 **Q. Do you see that?**
 7 A. Uh-huh.
 8 **Q. And towards the bottom of this, you've**
 9 **written that "Before ruling out a threat as no big**
 10 **deal, get more information and a second opinion,"**
 11 **right?**
 12 A. Correct.
 13 **Q. And in this case, Esther and Kevin gave**
 14 **their opinions, correct, that Karl was a low-level**
 15 **threat, right?**
 16 A. Yeah, that's -- I mean, that's how they
 17 documented it on the form.
 18 **Q. And they did not get your second opinion,**
 19 **because they didn't send you the threat assessment**
 20 **document at the time it was done, right?**
 21 A. Correct.
 22 **Q. And is it your testimony that even if you**
 23 **had gotten Exhibit 35, the threat assessment that**
 24 **Esther Song and Kevin Kolasa performed, based on what**
 25 **you knew at the time, you would have still**

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1 **characterized Kevin Kolasa as a low-level threat?**
 2 A. I can't say that. It would be based on
 3 whatever follow-up conversations I had with them.
 4 **Q. Okay. Well, in saying that it's**
 5 **important to get more information and a second opinion**
 6 **before ruling out a threat as no big deal, what**
 7 **additional information are you referring to there?**
 8 A. Well, typically what we're saying to
 9 folks is, you know, one of the critiques that you read
 10 just in the literature nationally is that one person
 11 meets with the kid, and here's what happened and says,
 12 Oh, it's no big deal. So part of what we coach people
 13 to train to is this is a process where you need
 14 multiple people giving input, giving perspective. If
 15 you're a professional who is new, if you're a new
 16 psychologist, a new social worker or counselor, don't
 17 just make a decision because you feel like you have to
 18 make a decisions. Pull in another colleague who has
 19 been doing this for a while. That's what we want
 20 people thinking about and doing.
 21 **Q. And part of why I'm asking about that is**
 22 **Deputy Englert reported that Kevin Kolasa told him**
 23 **that Karl Pierson's threat to kill Tracy Murphy was,**
 24 **quote, no big deal. Are you familiar with that?**
 25 A. I have heard that allegation, yes.

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1 **Q. And isn't that exactly the problem you're**
 2 **trying to address with this slide, is don't dismiss**
 3 **these threats until you talk to somebody else?**
 4 A. If that's true, I would say that's
 5 concerning.
 6 **Q. Okay.**
 7 A. I would also say that Deputy Englert has
 8 been around a long time, and if he heard about this, I
 9 think he -- he's been doing enough threat assessments
 10 that ideally, I would hope he is asking questions as
 11 well.
 12 **Q. Well, let's talk about that, because**
 13 **Deputy Englert didn't participate in this threat**
 14 **assessment, did he?**
 15 A. That's my understanding.
 16 **Q. And generally prior to 2013, the SRO,**
 17 **school resource officer, was not a participant in**
 18 **threat assessments, was he?**
 19 A. No, that's not true. He was involved in
 20 -- he was involved in one in 2012 that I was there
 21 with.
 22 **Q. Right.**
 23 A. I don't know about the one or two before
 24 that. I would have to double check on the records.
 25 **Q. And we can look. There was one -- as I**

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1 **understand it at Arapahoe, there was one done in 2011,**
 2 **and one done in 2012, right?**
 3 A. That sounds right to me.
 4 **Q. Okay. And for the one in 2011, he did**
 5 **not participate, but the one in 2012, he did; is that**
 6 **right?**
 7 A. I'd have to look at the records but
 8 that's --
 9 **Q. Sure. It's in exhibit -- actually, it's**
 10 **one of these here. Here you go. That's the very**
 11 **front one, the 2011 threat assessment.**
 12 A. Yes.
 13 **Q. And Deputy Englert did not participate in**
 14 **that one, did he?**
 15 A. I don't think so. It doesn't look like
 16 it.
 17 **Q. And in 2012, the one about the kid who**
 18 **brought the shiv to school in 2011, that one he did**
 19 **participate in, correct?**
 20 A. He certainly signed it, and, yeah, I was
 21 in that one, and I know he was there.
 22 **Q. Well, let's -- let me ask this. What did**
 23 **you train your building mental health professionals to**
 24 **do in terms of when to bring in the school resource**
 25 **officers on a threat assessment?**

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1 A. At this time, certainly we told schools
 2 that they needed to have them involved when there was
 3 weapons involved, when there was concern that there
 4 was imminent safety issues, meaning maybe a kid had a
 5 gun at school or a weapon at school. If there was
 6 very clear legal issues that a kid would be charged.
 7 It was not a requirement that they participate in
 8 every process at that point. We certainly talked
 9 about the SRO's being a part of the team and bringing
 10 them in on situations that was applicable. But it was
 11 not an expectation that they had to sit in on every
 12 meeting.

13 **Q. Okay. Going back to Exhibit 38, which is**
 14 **the Secret Service report.**

15 A. Sure.

16 **Q. It's loose.**

17 A. Oh, yeah. Okay. This one.

18 **Q. Is it that one? Yes, I think that's the**
 19 **one. I think it's that one.**

20 A. It's okay. I know it pretty well.

21 **Q. Okay. In this guide, and I'm going to**
 22 **direct your attention to page 35, if I could.**

23 A. Okay.

24 **Q. You'll see in the upper right page one of**
 25 **the principles that applies, according to the Secret**

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1 **Service and the Department of Education is focused on,**
 2 **"Information-Sharing in Support of the School Threat**
 3 **Assessment Process." Do you see that?**

4 A. Uh-huh.

5 **Q. And it reads, "Much emphasis in this**
 6 **Guide is placed upon the importance of sharing**
 7 **information about a student who may pose a risk of**
 8 **violence." Do you see that?**

9 A. Uh-huh.

10 **Q. Do you agree that sharing information**
 11 **about a student who may pose a risk of violence is an**
 12 **important element of the threat assessment process?**

13 A. Yes.

14 **Q. And at LPS in 2013, who was information**
 15 **shared with about students who may pose a risk of**
 16 **violence?**

17 A. Are you speaking about at the school
 18 level or at the district level or --

19 **Q. Both.**

20 A. Well, at the school level, certainly
 21 administrative teams review the situations and kids on
 22 an individual basis and the standard practice at the
 23 schools was -- at secondary schools was when they had
 24 their weekly administrator team meeting, they're
 25 looking at kids and they're looking at discipline

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1 that's come up for that week and what's going on and
 2 who's kind of our high flyer list. And so they
 3 reviewed it that way.

4 A number of buildings also include their
 5 mental health team as a part of those meetings. And
 6 then at the district level, you know, basically in
 7 2013, it was more informal. We didn't have a regular
 8 weekly meeting like we have now, but we certainly
 9 communicated across between the security department
 10 and my department in terms of who was having
 11 incidents. Safe2Tell still went to both departments,
 12 and then we certainly worked with, at the time, my
 13 predecessor, who did discipline, had a role in that as
 14 well in terms of who are the -- on kind of the
 15 district level monitoring for kids behaviorally and
 16 discipline-wise.

17 **Q. Well, at the district level, nobody knew**
 18 **that Karl Pierson had been the subject of a threat**
 19 **assessment in the fall of 2013, correct?**

20 A. Correct.

21 **Q. Not you, not Guy Grace, not Scott Murphy,**
 22 **not anybody, right?**

23 A. Right.

24 **Q. So there was a breakdown in the**
 25 **information sharing there; wouldn't you agree?**

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1 A. I agree.

2 **Q. And at the administrative level, Kevin**
 3 **Kolasa knew about the threat assessment. Do you know**
 4 **whether or not the other administrators at Arapahoe**
 5 **High School were informed of the threat assessment or**
 6 **had that document made available to them?**

7 A. Well, my understanding is that they were
 8 aware of the incident and the meeting that Kevin had
 9 with Esther and the family and Karl. I'm not aware of
 10 who all saw the document other -- on the
 11 administrative team other than Kevin.

12 **Q. All right.**

13 A. Prior to the shooting, of course.

14 **Q. Right. And am I correct in understanding**
 15 **that Karl Pierson's teachers were not informed of the**
 16 **fact that there had been a threat assessment performed**
 17 **on him?**

18 A. Except for Tracy Murphy, that's my
 19 understanding, and Mark Loptien.

20 **Q. And Mark Loptien. Okay. Do you --**
 21 **strike that.**

22 **Why weren't the teachers of students**
 23 **involved in a threat assessment not informed about**
 24 **that threat assessment in 2013?**

25 A. Well, I'd have to guess, based on what

<p style="text-align: right;">161</p> <p>1 Esther and Kevin were thinking, but typically our 2 procedure at the district has been for low-level 3 threats, we're not sharing that with every one of the 4 direct staff, even the kid's direct teachers, because 5 we've determined it a low level of concern. At 6 medium- and high-level concerns, we typically have 7 more conversation and sharing because teachers are 8 part of the follow-up supervision, safety and 9 supervision plan. 10 Q. Well, let me ask it from a different 11 angle. What did you do in 2011-2012, beginning in 12 2013, train your school psychologists and counselors 13 to do, in terms of when to inform a student's teachers 14 about a threat assessment? 15 A. Basically the concept was on a need to 16 act. So if you had a need to act, in terms of helping 17 a student follow their safety and supervision plan, if 18 you were involved in that situation, if you were a 19 target, you certainly need to know because you're 20 involved in that, and you need to know the outcome. 21 But the major concept was if you had a need to act. 22 And, again, even back to that time, 23 medium- and high-level concerns were put into Infinite 24 Campus as discipline, as part discipline and more 25 significant safety and supervision planning as opposed</p>	<p style="text-align: right;">163</p> <p>1 they have that kid in class now? 2 A. That's a building level principal 3 decision. Most of the time I would say, unless it 4 pertains to that teacher, they may not know exactly 5 why a student is suspended. 6 Q. And same with threat assessments, 7 teachers, prior to December of 2013, were only told 8 about threat assessments if they had a need to act; is 9 that right? 10 A. I would say in general, yes. There may 11 be building principals who did it a little bit 12 differently based on their own style or perspective. 13 Q. And is that handled differently now? 14 A. There are some changes. We've made some 15 more clarifications in our updated guidance documents. 16 The way we handle it now is at a minimum we still -- 17 we say that if a student has been on a medium or high 18 level, then the teachers are notified until the end of 19 that safety and supervision plan, until that has 20 ended. On a low level, we may still not be telling 21 all the teachers that the student has had a threat 22 assessment. 23 And that's because if we determined it at 24 a low-level concern, we are careful about the privacy 25 of that piece. And, again, taking in perspective the</p>
<p style="text-align: right;">162</p> <p>1 to low level, which then would be typically documented 2 on this form and then maybe in our counselor's log 3 where there was an indication. So it wouldn't 4 necessarily -- a low level wouldn't necessarily be in 5 discipline unless, of course, there was a discipline 6 applied for that incident, and then it would show up. 7 Q. All right. But even then, what I have 8 heard from teachers, and maybe I'm right, maybe I'm 9 wrong, is that when a student is suspended at Arapahoe 10 High School, the teacher is told that there is a 11 suspension, but not the reason behind that suspension. 12 Have I got that right? 13 A. That's my general understanding. I don't 14 know the specifics of how they do it. Suspension 15 shows up in the attendance, and most teachers can see 16 the attendance. So if it says suspension in the 17 attendance, I don't know if they're notifying every 18 single teacher every time a student gets suspended. 19 At that testimony in 2013 -- 20 Q. But aren't you in charge of the 21 discipline? I thought you said that you oversaw all 22 of the disciplinary -- 23 A. In 2013, I did not. 24 Q. Okay. How does it work now? Are 25 teachers told the reason behind a kid's suspension if</p>	<p style="text-align: right;">164</p> <p>1 broad range of situations that we deal with from young 2 kids all the way to older, it's a balance of 3 maintaining safety and sharing information with 4 recoverability for students who, most of which have 5 made mistakes, that are not a part of who they're 6 going to be and act out in the future. 7 Q. Okay. Let's jump ahead in 38, if you 8 would, and I want to look now at the chapter on -- 9 actually, how one conducts a school threat assessment. 10 And it starts at about page 42, 43. It's chapter 5. 11 A. Okay. 12 Q. Are you there? 13 A. Yes. 14 Q. Okay. Actually, let me ask one last 15 question on our last topic about who knows about 16 threat assessments. Wouldn't you agree that if 17 teachers and security and other students, SRO's don't 18 know about the fact that Karl Pierson receives a 19 threat assessment, it's more likely that they're going 20 to view things like looking at guns online in the 21 cafeteria as not a significant concern? 22 A. I don't know. I mean, I guess you could 23 say that's generally true, but I also think that it's 24 -- you have to think in the big picture of every 25 school. And if we shared with every student and every</p>

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1 staff member all of the discipline and the assessments
 2 that we're doing, you would have a very, very
 3 different environment. And you would have kids get
 4 significantly labeled. And so it's -- that's a
 5 balancing act of protecting confidentiality and rights
 6 of students and family with safety.
 7 And so we have to have some -- I mean,
 8 our approach has been if we determined it a low level
 9 of concern, that's one of the cut points that tells us
 10 how much we're sharing, and obviously it's a cut point
 11 for what kind of safety and supervision planning we're
 12 doing, as well as the information sharing. So it's
 13 kind of a judgment call that we have to make as a
 14 district and --
 15 **Q. Sure.**
 16 A. -- it's a very difficult one.
 17 **Q. Right. And if Karl Pierson had been**
 18 **labeled something other than a low-level threat, more**
 19 **people would have known about the threat assessment,**
 20 **and he would have been much more closely monitored;**
 21 **isn't that right?**
 22 A. Ideally, yeah.
 23 **Q. Okay. Let's go back to chapter 5 and how**
 24 **you actually conduct a threat assessment. On the**
 25 **first page it talks about the threat assessment**

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1 **process as a continuum, right?**
 2 A. Yes.
 3 **Q. What does that mean to you?**
 4 A. You know, I think it refers to a couple
 5 things. You know, I think they're trying to make some
 6 clarifications about a school inquiry as opposed to a
 7 law enforcement investigation. I also think it refers
 8 to that these are not static things that -- again, you
 9 have to try to look at patterns over time.
 10 **Q. Right. A threat assessment is much less**
 11 **effective if it is taken only as a snapshot in time,**
 12 **right?**
 13 A. Yeah, in general.
 14 **Q. And that's why information sharing and**
 15 **follow-up and monitoring is so important to the**
 16 **effective use of threat assessment as a tool to**
 17 **predict or prevent school violence; wouldn't you**
 18 **agree?**
 19 A. Well, I would say threat assessment is
 20 never a predictor. We never train that way. All of
 21 the literature talks about it's not a way to predict
 22 violence.
 23 **Q. And that's why I included prevent.**
 24 A. And I would say there is very little
 25 research that shows a threat assessment prevents

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1 violence. What I would say is it's a best practice
 2 that allows us to gather information to determine what
 3 actions are the best course to take to support a
 4 student who could be on that path to violence. So I
 5 don't remember the original question you asked me.
 6 **Q. The original question was, don't you**
 7 **agree that for threat assessments to be effective,**
 8 **they can't just be a snapshot in time, and that's why**
 9 **information sharing and follow-up and monitoring are**
 10 **so important?**
 11 A. Yes, in general, I agree with that, yes.
 12 **Q. And if you jump ahead to page 47, one of**
 13 **the essential factors in making a threat assessment**
 14 **effective is to create a central point of contact,**
 15 **right?**
 16 A. I see that, yes.
 17 **Q. And according to the FBI -- or the Secret**
 18 **Service and the Department of Education, this guide**
 19 **says, "The threat assessment team should designate a**
 20 **member of the team to serve as the initial point of**
 21 **contact for information of possible concern. The**
 22 **availability of this point of contact should be known**
 23 **community-wide." Do you see that?**
 24 A. Yes.
 25 **Q. Do you agree with it?**

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1 A. I agree that we need a central point of
 2 contact. We have made the decision not to push the
 3 issue of making one person a community-wide contact
 4 for each school for a couple of reasons. One, people
 5 turn over and positions turn over, so we've set that
 6 expectation on the administrator who is working and
 7 overseeing that student.
 8 So in a high school, it may be the
 9 assistant principal who is what we call the vortex,
 10 who would be the person that needs to get that
 11 information, because they're overseeing that process.
 12 So we haven't promoted, hey, school, put this person's
 13 name on your Web site as this is the person who you
 14 contact for every single concern. We try to use the
 15 natural systems that they have, but ultimately lying
 16 with the administrator who oversees that.
 17 **Q. And how is it made known community-wide**
 18 **that if there is a concern about student X, this is**
 19 **where you go with it?**
 20 A. The only way I can think about that is
 21 maybe through school newsletters or on the Web site
 22 that says, Here is who you contact for this student
 23 group or this particular area of the school. You
 24 know, we do have some of the high schools where one
 25 assistant principal is assigned to security. So that

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1 may be known, but most of our schools, it goes by
 2 grade level. So you're working with the administrator
 3 that has your grade level, and it says that on the Web
 4 site. It's not clear to say, If you're worried about
 5 early warning signs, here is who you call.
 6 **Q. And that's what I'm asking.**
 7 A. That's not clear at this point in most of
 8 our schools. There is not a designated one person.
 9 **Q. And in the next paragraph in this same**
 10 **section, this guide goes on to say that "Schools**
 11 **should publicize the name of the designated point of**
 12 **contact to faculty, staff, parents, and students as**
 13 **the person to contact with any information or**
 14 **potential concern." Do you see that?**
 15 A. Uh-huh.
 16 **Q. And from your previous answer, I take it**
 17 **that's not something that LPS is doing right now?**
 18 A. Well, we do that in the way of making
 19 clear that we have 24-hour security as a districtwide
 20 resource for any parent at any time, that that can be
 21 a central place. We do have, obviously, the Safe2Tell
 22 information as another anonymous way to report. What
 23 we're not doing at this point is identifying one
 24 person at each building.
 25 **Q. Okay. Let's take a look at the next**

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1 **page, if we could. The first question posed by this**
 2 **study on this page asks, "When should a threat**
 3 **assessment inquiry be initiated?" Do you see that?**
 4 A. Uh-huh.
 5 **Q. And it goes on to say in a couple of**
 6 **places, including in the bubble on the left, "Upon**
 7 **receiving information concerning a potentially**
 8 **threatening situation, the threat assessment team must**
 9 **first consider: 'How much team do we have?' An**
 10 **inquiry should be initiated immediately (within hours**
 11 **of notification) in any situation of concern." Do you**
 12 **see that?**
 13 A. Yes.
 14 **Q. In the case of Karl Pierson, Arapahoe**
 15 **High School waited six days to perform the threat**
 16 **assessment, right?**
 17 A. Well, to have the meeting with the
 18 family, yeah.
 19 **Q. And that's when this threat assessment**
 20 **was done, right?**
 21 A. Again, remember, threat assessment is not
 22 just a document in a meeting. It's a process, and so
 23 that process can be starting immediately, but it may
 24 not culminate into documenting that until later. So
 25 we coach that this is a process, and that you can have

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1 people participating in that process. Just attending
 2 the meeting and signing the form is not the only way
 3 that process occurs.
 4 **Q. Okay. And one of the things that was**
 5 **done as part of this broader process of assessing the**
 6 **threat that Karl Pierson posed was the decision to**
 7 **keep him out of school for three days, rather than**
 8 **suspending him, correct?**
 9 A. Yes.
 10 **Q. Do you know why the decision was made not**
 11 **to suspend him, but rather just to let him stay home?**
 12 A. My understanding is that it was a request
 13 from his mother.
 14 **Q. Why was that request honored?**
 15 A. I had a very brief conversation with
 16 Kevin about that.
 17 **Q. And what does he say?**
 18 A. I think the -- you know, most of those
 19 were with Steve, so I can't go into all of those, but
 20 I guess what I would say is he was thinking that -- he
 21 was trying to think in the best interest of the
 22 student and believed that his family was taking him to
 23 get help.
 24 **Q. Again, as part of this broader threat**
 25 **assessment process, do you know, once the decision was**

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1 **made to let Karl's mother keep him at home for those**
 2 **three days, what instructions were given to the school**
 3 **about what to do if he showed up?**
 4 A. I can't speak to that.
 5 **Q. Was campus security told, If he shows up,**
 6 **call us, call the police, inform the administration?**
 7 A. I believe they were told that, but I
 8 don't know exactly when.
 9 **Q. Do you know whether or not his teachers**
 10 **were told he was being held out of school for those**
 11 **three days?**
 12 A. I believe they were told, but I don't
 13 know exactly when or how that happened.
 14 **Q. Have you seen any documents as part of**
 15 **this entire tragedy that explain what guidance Kevin**
 16 **Kolasa provided to the rest of the school about the**
 17 **fact that Karl Pierson wasn't supposed to be there for**
 18 **the next three days?**
 19 A. I don't believe I've seen any documents.
 20 **Q. Let's keep going on Exhibit 38. The next**
 21 **question that is asked there is what information**
 22 **should be sought in a threat assessment inquiry,**
 23 **correct?**
 24 A. Yes.
 25 **Q. And if you go through the next several**

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1 **pages, there is substantial detail about what kind of**
 2 **information the threat assessment team should gather,**
 3 **correct?**
 4 A. Yes.
 5 **Q. And I think if you go through it, there's**
 6 **a total of five different things that the Secret**
 7 **Service and the Department of Education instruct the**
 8 **threat assessment team to focus on, right?**
 9 A. Uh-huh.
 10 **Q. One is, "The facts that drew attention to**
 11 **the student, the situation, and possibly the targets."**
 12 A. Uh-huh.
 13 **Q. The second one is, "Information about the**
 14 **student," right?**
 15 A. Uh-huh.
 16 **Q. Third is, "Information about**
 17 **'attack-related' behaviors," right?**
 18 A. Yes.
 19 **Q. Fourth is, "Motives"?**
 20 A. Uh-huh.
 21 **Q. And the fifth is, "Target Selection,"**
 22 **correct?**
 23 A. Yes.
 24 **Q. Those are the five different types of**
 25 **information that the Secret Service, Department of**

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1 **Education guide tells threat assessment teams they**
 2 **should be looking at, right?**
 3 A. Yes.
 4 **Q. In looking through Exhibit 4, I don't see**
 5 **anything that goes through the five different types of**
 6 **information that the attendees at your training are**
 7 **supposed to gather.**
 8 A. Yeah, I don't think we had those five
 9 specifically outlined in here. We have the sources of
 10 information page, which we already went through.
 11 **Q. Right.**
 12 A. Obviously the written material page, but
 13 we didn't go through these specifically. And, again,
 14 our process -- this is one of the documents our
 15 process is established on. There's multiple others
 16 you may have as exhibits as well, I don't know. So
 17 some of the components are in here from here, some of
 18 them are not.
 19 **Q. Right. But if the whole point of this**
 20 **training module is to teach people how to do a threat**
 21 **assessment, wouldn't it be important to include in**
 22 **this, Here is the types of information you should be**
 23 **looking for when you look at all of these various**
 24 **sources?**
 25 A. Yeah, and we do talk about that. It may

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1 not be in the same five subheadings as the -- as are
 2 in this document, but we do talk about those sources
 3 of information, and I think our form covers -- it may
 4 not line up line for line, but it covers these five
 5 topics for the most part. And, again, our form was
 6 designed after, you know, some other sources as well.
 7 (At this time Ms. Davis and Ms. Lembke
 8 left the room.)
 9 **Q. Understood. Well, for instance -- and go**
 10 **ahead and jump to page 50, if you would, and we've**
 11 **touched on this, but I want to go back to it. On page**
 12 **50, the Secret Service document indicates that "Of**
 13 **particular note is whether the student has any**
 14 **trusting relationships with adults who are emotionally**
 15 **available to him or her, or whether the student is**
 16 **known to be consistently respectful to any adult,"**
 17 **right?**
 18 A. Which number is that?
 19 **Q. Oh, it's not a numbered one. It's right**
 20 **there.**
 21 A. Oh, okay.
 22 **Q. Got it?**
 23 A. Yep.
 24 MR. EVERALL: "Right there" being where?
 25 MR. ROCHE: Top left.

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1 A. Uh-huh.
 2 **Q. (BY MR. ROCHE) Do you agree that that is**
 3 **something that is particularly important when**
 4 **assessing what level of a threat a student poses at a**
 5 **school?**
 6 A. I think it's one of the important
 7 factors, yes.
 8 **Q. And I don't see that as being something**
 9 **that you trained your mental health professionals on**
 10 **in Exhibit 4 either, is it?**
 11 A. I don't think it's explicit in the text
 12 on the pages, but, again, it is something we talk
 13 about frequently, and especially we tie it very
 14 strongly together in the follow-up plan, which is, who
 15 is going to work with this kid, who does this kid
 16 trust. So it may not be in there explicitly in the
 17 bullet points, but it's been a concept that we trained
 18 on the whole time.
 19 **Q. Okay. And it's -- the lack of such a**
 20 **trusting supportive relationship is itself an area of**
 21 **concern when performing one of these threat**
 22 **assessments, correct?**
 23 A. Well, in general, if a kid does not have
 24 any solid or trusting relationships with adults, that
 25 would be a concern, yes.

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1 MR. EVERALL: Should we stop?
 2 MR. DAVIS: You can keep going.
 3 (At this time Mr. Davis left the room.)
 4 MR. ROCHE: We're okay.
 5 **Q. (BY MR. ROCHE) And the reason I ask is**
 6 **that is something that actually does appear -- at**
 7 **least something like it on the threat assessment**
 8 **template that was used at Arapahoe High School in**
 9 **2013, one of the protective factors listed is**
 10 **supportive relationship?**
 11 A. Correct.
 12 **Q. None, sometimes, and who, right?**
 13 A. Correct.
 14 **Q. And in Karl's case that's blank, right?**
 15 A. Right.
 16 **Q. What do you train your mental health**
 17 **professionals to do to find out whether or not a**
 18 **student has any such trusting relationships with**
 19 **adults who are emotionally available to them?**
 20 A. You ask the kid and you ask the family
 21 and you ask people who know the kid that question.
 22 **Q. Do you know whether Esther or Kevin asked**
 23 **that question during this threat assessment?**
 24 A. No.
 25 **Q. Certainly something they should have**

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1 asked though?
 2 A. Yes.
 3 **Q. The next subject on how to conduct a**
 4 **threat assessment in this Secret Service document**
 5 **talks about the sources of information for the**
 6 **inquiry, and I think we've covered that, so I'm not**
 7 **going to replot that ground. And then when you move**
 8 **ahead to page 55, you get to what are called the 11**
 9 **key questions. Are you familiar with those?**
 10 A. Yes.
 11 **Q. And they're all laid out in the next**
 12 **three pages of the Secret Service document, correct?**
 13 (At this time Mr. Davis, Ms. Davis, and
 14 Ms. Lembke entered the room.)
 15 A. Yes.
 16 **Q. And, again, I looked through Exhibit 4,**
 17 **which is the training that Esther Song undertook --**
 18 A. Uh-huh.
 19 **Q. -- and there's a reference on page --**
 20 A. Yeah, I see it.
 21 **Q. -- 512 --**
 22 A. Uh-huh.
 23 **Q. -- to those 11 key questions, correct?**
 24 A. Yes. Yes.
 25 **Q. I don't know that I have that handout.**

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1 A. I think we've sent it to you.
 2 **Q. Take a look -- actually, it might be**
 3 **Exhibit 6.**
 4 A. Yeah, that's the most current version.
 5 **Q. And this one is dated 2010?**
 6 A. Yeah.
 7 **Q. So you were using a school safety**
 8 **resource center handout to discuss the 11 key**
 9 **questions; is that right?**
 10 A. I don't remember if at this training we
 11 used this exact one, but it's either this one or a
 12 prior version of it, yeah.
 13 **Q. Okay. And go ahead and stick with**
 14 **Exhibit 6 for a minute.**
 15 A. Okay.
 16 **Q. These 11 questions that the Secret**
 17 **Service characterizes as key to any threat assessment**
 18 **inquiry aren't covered in Exhibit 35, are they?**
 19 A. What's Exhibit 35?
 20 **Q. The threat assessment template that**
 21 **Arapahoe High School was using.**
 22 A. Not explicitly, no. The form gathers
 23 information to help you answer those questions, but
 24 they're not explicit at all in question form.
 25 **Q. Okay. Well, does -- do people who**

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1 **perform threat assessments for LPS back in this time**
 2 **frame answer these 11 questions as part of their**
 3 **process?**
 4 A. I would say it depends on the situation.
 5 There are some situations where, yes, the team sat
 6 down and went through those. There's some situations
 7 where, you know, depending on the nature of the threat
 8 or the incident, they may not. We've definitely
 9 coached teams to use it as a way to help sort out when
 10 you're not exactly sure or you have teams that are in
 11 disagreement about the level of concern.
 12 **Q. All right. Do you know whether or not**
 13 **Esther Song and Kevin Kolasa made any effort to answer**
 14 **these 11 questions that the Secret Service has**
 15 **identified as the key questions in a threat assessment**
 16 **inquiry?**
 17 A. No.
 18 **Q. One of those key questions that the**
 19 **secret service has identified is No. 10, "Are other**
 20 **people concerned about the student's potential for**
 21 **violence?" Do you see that?**
 22 A. Which one are you on now?
 23 **Q. It's on both of them, actually, but it's**
 24 **easier here. It's bigger print.**
 25 A. Yes.

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1 **Q. You got that?**
 2 A. Sure.
 3 **Q. What do you train your attendees to do to**
 4 **answer the question are other people concerned about a**
 5 **student's potential for violence?**
 6 A. I mean, nothing more than what I've
 7 talked to you about already. I mean, you know the --
 8 all of those, you know, different conversations that
 9 we talked about. In terms of a threat assessment
 10 team, we want them to have some information, as much
 11 information as possible, within what's an appropriate
 12 scope to find out what other people know about a
 13 student. So it might include talking to teachers to
 14 -- like we said, staff or students.
 15 **Q. Right. So if, for instance -- if Karl**
 16 **Pierson had been labeled a medium-level threat, more**
 17 **people would have been asked, Are you concerned about**
 18 **his potential for violence, right?**
 19 A. I think that's fair to say.
 20 **Q. And because he was labeled a low-level**
 21 **threat, the only people who were asked about his**
 22 **potential for violence were Tracy Murphy, who was**
 23 **scared to death, and his parents and Karl, right?**
 24 A. I think James Englert was a part of that
 25 as well, and Mark Loptien knew as well. But in terms

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1 of prior to the assessment, you mean, or after?
 2 **Q. Both, actually.**
 3 A. Off the top of my head, those are people
 4 that I know were informed of what was going on as well
 5 as -- my understanding is the administrative team knew
 6 that he had made a threat. I believe at some point
 7 the campus monitors and security team knew, but I
 8 don't know when exactly that was. And there may have
 9 been other teachers or staff who knew just from
 10 hearing rumors or, you know, talking to Tracy or Mark.
 11 **Q. All right.**
 12 A. I don't know the specifics of those.
 13 MR. ROCHE: Why don't we take our
 14 afternoon break.
 15 (Recess taken, 2:24 p.m. to 2:43 p.m.,
 16 after which time Mr. Ewert was no longer present and
 17 Ms. Kanan joined the proceedings by phone.)
 18 MR. ROCHE: Back on the record. Linda,
 19 are you there?
 20 MS. KANAN: Yes. Thank you. I'm here
 21 again.
 22 MR. ROCHE: Okay. Very good. Let's go
 23 ahead and mark this as 44.
 24 (Deposition Exhibits 44 and 45 were
 25 marked.)

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1 **Q. (BY MR. ROCHE) And Exhibit 44 is what**
 2 **looks like an agenda for a program concerning threat**
 3 **assessment in schools and the latest updates. Do you**
 4 **see that?**
 5 A. Yes.
 6 **Q. It's dated April 12, 2013. It looks like**
 7 **it was done up at a hotel or a conference center up in**
 8 **Loveland, Colorado, right?**
 9 A. Yes. Yes.
 10 **Q. Do you recall that program?**
 11 A. Yes.
 12 **Q. And it looks to me like you were**
 13 **presenting at that program; is that right?**
 14 A. Correct.
 15 **Q. Can you tell me, looking at Exhibit 45,**
 16 **is this what you presented to them, or is this**
 17 **something else?**
 18 A. This is it.
 19 **Q. That was my impression, but the name is**
 20 **obviously slightly different from what's listed on the**
 21 **agenda.**
 22 A. Yeah, it was a panel, so there was two of
 23 us in that portion. And then there was a follow-up
 24 with questions and answers, but this was my portion of
 25 the panel presentation.

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1 **Q. Okay. That's what I thought. And in**
 2 **particular, one of the things you were talking about**
 3 **was threat assessment in K-12 schools, right?**
 4 A. Correct.
 5 **Q. And included in your slides was some data**
 6 **on how many threat assessments Littleton Public**
 7 **Schools had done over the last five years -- four**
 8 **years?**
 9 A. Four years, and, again, the first year
 10 was a partial year. We just started at the end of
 11 that year. I wasn't overseeing it at that time, but
 12 that was the first year we started tracking.
 13 **Q. Okay.**
 14 A. So the first year we did official
 15 procedure and process.
 16 **Q. And one thing I'm just curious about is**
 17 **on this slide, it says 45 percent of all threat**
 18 **assessments occur in the March/April or**
 19 **October/November time frame. Do you have any sense of**
 20 **why that is?**
 21 A. If you worked in this business for any
 22 amount of time, you know that those two time periods
 23 are always the hardest for mental health. There's a
 24 number of reasons that people believe. Typically,
 25 October/November is after school has been in session

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1 for quite a while, you're heading into the holidays,
 2 but these are pretty well established if you've worked
 3 in the business. I would say most mental health
 4 professionals will tell you those are pretty common
 5 times. The only other time might be the holidays
 6 themselves.
 7 **Q. Why is that though? I understand it may**
 8 **be well established.**
 9 A. I think there's a lot of thoughts to it.
 10 I think for schools, we see it as times when kids have
 11 been in school long enough into the semester that it
 12 gets really hard, they're stressed, you know, grades
 13 are coming due for older kids. We also know that the
 14 weather changes, and I'm a believer that there are
 15 some impacts of barometer kind of things. Then,
 16 again, in March/April we're talking about the lead up
 17 to spring break, changing of seasons, school being
 18 close to getting out. So our data is pretty
 19 consistent, both with suicide and threats, for those
 20 two time periods.
 21 **Q. Let me jump a little farther into this**
 22 **slide deck. I'll direct your attention to page 3606.**
 23 **It talks about written material.**
 24 A. Uh-huh. Yes.
 25 **Q. There you go. And on this slide, there's**

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1 **a number of recommendations that you're making to the**
 2 **attendees at this presentation, correct?**
 3 A. Yes.
 4 **Q. And one of them is that under certain**
 5 **circumstances in performing a threat assessment, you**
 6 **may want to look at a student's written material,**
 7 **right?**
 8 A. Correct.
 9 **Q. My question is, what guidance do you**
 10 **provide on when the members of a threat assessment**
 11 **team should look at a student's written material?**
 12 A. Well, we've trained on that from the
 13 beginning. We start with if the written material is
 14 involved in the nature of the threat, so you start
 15 with that. And you say, okay, if you have a threat
 16 that's in the written material, so we provide some
 17 examples of what those could look like.
 18 **Q. Right.**
 19 A. We talk about, okay, here is some
 20 examples of what that looks like and how might we
 21 assess that, and what's going on for the student.
 22 We --
 23 **Q. But do you --**
 24 A. Go ahead.
 25 **Q. Do you train the people performing threat**

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1 **assessments to be proactive and search out a student's**
 2 **written materials once the student has come to the**
 3 **attention of the threat assessment team, or do you**
 4 **train them to simply wait and have that written**
 5 **material brought or reported back to them?**
 6 A. I would say it's neither. I would say we
 7 talked to them about this can be an important source
 8 of the information. So if there is reason to believe,
 9 based on what's going on for this student, it's an
 10 appropriate thing to look at within obviously what's
 11 reasonable within our policies and, you know, legal
 12 guidelines.
 13 But mainly what we're trying to get
 14 across with this part of the training is really
 15 understanding context. So we're not teaching them
 16 necessarily to go out and dig up every single piece of
 17 paper or artwork that a kid has ever done. But
 18 certainly if we have access to some of those things,
 19 we want to review them, or if they've come to the
 20 attention of the staff and also talking with teachers
 21 about what to be aware of and what to bring to the
 22 attention of an administrator or a counselor if
 23 they're worried about them.
 24 **Q. All right. Let's jump ahead to -- I**
 25 **think it's page 3612, the cyberspace page.**

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1 A. Yes.
 2 **Q. And this slide is focused on, "Threats in**
 3 **cyberspace," right?**
 4 A. Correct.
 5 **Q. And I'm assuming that one of the points**
 6 **of this slide is to emphasize the importance to people**
 7 **performing threat assessments of checking a student's**
 8 **Web or social media presence and to follow up or**
 9 **monitor on that; is that right?**
 10 A. Yeah, we have a -- in this presentation,
 11 I think I basically talked about similar concepts to
 12 what we train our staff in, which is just when it
 13 happens in cyberspace, these are some of the important
 14 things to think about. You know, in terms of
 15 immediacy, you can't wait until Monday morning, if you
 16 see a threat on Facebook, you've got to deal with it
 17 right away. We talk a lot about if teachers are on
 18 Facebook or they're texting with students, that they
 19 have to understand that if they have that
 20 relationship, that they may get information on a
 21 Sunday or another day, and they need to know what to
 22 do with it. And so have they had that conversation
 23 with their staff. We talk about context. So we talk
 24 about understanding what the nature of the
 25 conversation was or the situation. So, I mean, I

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1 guess you can see the bullet points here.
 2 **Q. Right. Well, let's talk about the last**
 3 **two where you talk about the importance of following**
 4 **up and monitoring. Tell me what you train people**
 5 **performing threat assessments to do with respect to**
 6 **following up and monitoring cyber threats.**
 7 A. Well, I think in -- like it depends,
 8 again, on the individual situation, and if the threats
 9 were originally online or not. But typically what we
 10 tell folks is that it is okay if we -- you know,
 11 obviously if a kid's Facebook site is public or
 12 something else, that if we have reason to believe that
 13 there is continuing to be threats on there or
 14 information that a student brings to us like, Hey,
 15 this kid is still posting that he wants to do
 16 something, that it's okay to go look at that if it's
 17 public.
 18 We also talk about if kids are coming and
 19 reporting to you and saying, Look what this kid texted
 20 to me, that we ask the student if we can take a
 21 picture of that or screen shot and use that on terms
 22 of following up or intervening with the student, that
 23 if we do see additional things on cyberspace that we
 24 have the ability to bring the kid in and talk to them
 25 about it and say, Wait a minute, we did this process,

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1 you're still continuing to say things about this, we
 2 need to talk about next steps. Same thing with their
 3 parents.
 4 **Q. Do you train the folks who do threat**
 5 **assessments at LPS to, as part of a threat assessment**
 6 **process, look at the student of concern's Facebook**
 7 **account, Twitter account, Instagram, Snapchat,**
 8 **whatever the heck they're using?**
 9 A. We train them that that's an option they
 10 have. We don't train that they have to do it in every
 11 single threat assessment. So they don't have to go,
 12 you know, look up that kid's private Facebook. Our
 13 security department spends a lot of time as a resource
 14 for the schools, so we do instruct them if that at any
 15 time they need assistance and we have instructed that
 16 if we believe there is something on there that we
 17 can't find, we can work with our IT department to try
 18 to do some additional, broader Internet-wide searches.
 19 In our new guidance, that has been --
 20 recently been updated. We talk about the right to
 21 look through all of the Google accounts that the
 22 school provides to the student. So I would say on a
 23 much regular basis now, we are going through at least,
 24 at minimum, that kid's Google account to look at their
 25 Google e-mail that's district provided because, again,

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1 that's district provided. We have the right to go
 2 through that. So that's more of a regular basis at
 3 this point.
 4 But we don't train that it is a required
 5 component, because it's just so broad. It's hard to
 6 say, okay, well, you have to search their Facebook and
 7 their Instagram. So we talk about that you need to
 8 have that inquisitive mindset to figure out where else
 9 -- you know, if we get the hint from students that
 10 this kid is saying a lot online, then, yeah, we go try
 11 to figure that out, and that's how we train folks.
 12 **Q. Okay. And that's what I'm trying to get**
 13 **at is what guidance do you give to the people**
 14 **performing threat assessments as to when they should**
 15 **investigate the Facebook account or other social media**
 16 **accounts of a student of concern?**
 17 A. Well, I think that's basically generally
 18 it is certainly if there's reports that there's things
 19 being said or information that we need to look at
 20 online, or if it's reported and then -- and then if we
 21 have reason to believe that there could be something
 22 on there, so that's definitely when they need to do
 23 it, and then certainly they have the option to request
 24 assistance to look at that in other situations.
 25 **Q. Okay.**

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1 A. Especially like if a parent said to us, I
 2 don't know what they're doing on Facebook. I don't
 3 have a log-in to their account. And we can certainly
 4 talk to the parent and assist them.
 5 **Q. And that goes to one of the questions I**
 6 **was going to ask next, which is when your people**
 7 **perform a threat assessment on a student within the**
 8 **LPS system, are they trained to ask the parents, Are**
 9 **you monitoring your students social media accounts?**
 10 **Do you have their e-mail password or their Facebook**
 11 **password?**
 12 A. We talk about that in the training. We
 13 also have had -- every year we've had cybersafety
 14 trainings where we talk about that with the parents
 15 who are in attendance there. So I don't think those
 16 documents are -- but we've had -- we had the student
 17 workshop for cybersafety, and then we've also had
 18 parent workshops every year.
 19 But in our threat assessment training, we
 20 talk about making sure that parents know what the
 21 log-in is to the student's phone. We've had a number
 22 of situations where the parents don't even know the
 23 password to their kid's phone and have no clue what's
 24 on there, the pictures, or those kind of things.
 25 **Q. And that's exactly why I'm asking,**

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1 because we now know, for instance, that Karl Pierson
 2 had pictures of a gun on his phone, and he was showing
 3 them to a number of people. Do you know whether or
 4 not in 2013 when they did the threat assessment on
 5 Karl Pierson, Esther Song or Kevin Kolasa ever asked
 6 Karl's parents, Do you have access to his Facebook
 7 page, the password to his phone, the password to his
 8 tablet, the log-in to his laptop, any of those kind of
 9 questions?
 10 A. I don't know if they asked them.
 11 Q. Did you train Esther to do that when she
 12 went through the training that's depicted in
 13 Exhibit 4?
 14 A. I would say that in the training was
 15 included these concepts that we're talking about right
 16 now. At least a discussion of those and how you
 17 assess what might be online.
 18 Q. And forgive me if I asked this already,
 19 but I really want to sort of understand what you mean
 20 on this slide when you talk about follow-up and
 21 monitoring.
 22 A. Well, I guess a couple things. When I
 23 typically talk about this concept, we talk a lot
 24 about, you know, if a kid has made a comment online,
 25 we don't just necessarily let that go and say, oh,

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1 it's just a kid being -- a boy being a boy or
 2 something. We want to check in with the student and
 3 say, What did you say. Tell me what you meant by
 4 that. What was going on in this situation. Certainly
 5 if it happens after hours, which these frequently do,
 6 part of that follow-up is meeting with that kid on
 7 Monday morning or whenever we see them next at school
 8 and having a conversation. Frequently Safe2Tell
 9 reports come via this venue, a Facebook or, you know,
 10 a text or something else.
 11 And then in terms of the monitoring,
 12 obviously we're limited by some constraints in terms
 13 of privacy, but we do talk to staff around if we know
 14 that this is a kid who is prone to say things or post
 15 things that could give us information or be
 16 concerning, that we do have the option of trying to
 17 monitor that if it's public, and if it's not, to
 18 follow up with the family and say, Hey, we're
 19 continuing to see this stuff. We want to bring you in
 20 and talk about it.
 21 Q. Do you know if in this case anyone from
 22 LPS or Arapahoe High School ever checked Karl
 23 Pierson's social media accounts prior to the shooting?
 24 A. Not to my knowledge.
 25 Q. Do you know if someone from LPS or

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1 Arapahoe High School ever asked if they could see what
 2 was on Karl's phone, laptop, or tablet prior to the
 3 shooting?
 4 A. Not to my knowledge.
 5 Q. Tell me what you can about what guidance
 6 you provided in your training to the Esther Songs of
 7 the world about when they should ask to see a
 8 student's phone, laptop, tablet.
 9 A. So not in this training, you're talking
 10 about now back to the 2011?
 11 Q. Well, in any training, in any of the
 12 training modules that you used to teach this stuff.
 13 A. Well, typically what we talk with them
 14 about is the -- I think the same things, as I
 15 mentioned before, which is certainly if the threat is
 16 made online, or if we have students reporting or staff
 17 reporting, that there's still something happening
 18 online, that's a given that you definitely would be
 19 checking. But if we had other reason to believe,
 20 whether it's through a parent or through any other
 21 reason, that we should try to look at that, we do.
 22 I'll be clear to say I -- it's not a --
 23 it was not a requirement at that time, and at this
 24 time, it's still not a requirement that they do that
 25 to the extent of, you know, trying to find every kid's

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1 Facebook, Instagram, Snapchat. There's just so many
 2 of those, we can't set a guideline that says you have
 3 to look at every one. But we do guide that that's an
 4 important source of information in this day and age
 5 with the way the kids communicate.
 6 Q. Well, you said a criticism that you have
 7 of the threat assessment that was performed on Karl
 8 Pierson that to your knowledge nobody ever looked at
 9 his Facebook account, his Twitter account, his phone,
 10 his laptop, his tablet as part of that process.
 11 A. It would have been very helpful
 12 information to have.
 13 Q. And have you changed your training
 14 modules since the shooting to provide further guidance
 15 on when that's appropriate to do?
 16 A. I would say not substantially. I would
 17 say we still go through these same contexts. We
 18 definitely provide a lot of examples and a lot of case
 19 examples that talk about here's situations of when and
 20 why you would do that. We also have definitely talked
 21 more about the ability to search the school Google
 22 account. And that we don't need parent permission for
 23 that. We don't need student permission to search that
 24 piece.
 25 Q. Right.

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1 A. I wouldn't say it's been completely
 2 substantial, but I would say we certainly emphasize
 3 it.
 4 **Q. Was Karl's Google docs or Google mail or**
 5 **any of his school accounts searched as part of the**
 6 **threat assessment that was done on him?**
 7 A. Not to my knowledge.
 8 **Q. And, again, I didn't see that as**
 9 **something that appeared in the slides in Exhibit 4,**
 10 **the 2011 training that we spent so much time talking**
 11 **about. Is that part of the training you provide now?**
 12 A. It's part of what we talk about when we
 13 talk about searches. It was not an explicit slide at
 14 that time. And, again, in 2011 I think that was
 15 before we even had the district Google accounts. So
 16 the district Google account is kind of a new thing,
 17 because now they're e-mail and documents that we own
 18 basically as a district. So those have kind of become
 19 new in the last few years.
 20 **Q. After the shooting, did anyone go back**
 21 **and look at Karl Pierson's Google accounts, the school**
 22 **provided ones?**
 23 A. Yes.
 24 **Q. And was there anything in those accounts**
 25 **that foreshadowed what happened on December 13?**

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1 A. I have not reviewed all of those. The
 2 ones that I have, there was nothing that raised that
 3 flag for me. There's other pieces of that that I have
 4 not fully reviewed, just because of the amount of
 5 information. But my understanding from folks is that
 6 there was not anything of significant red flag.
 7 **Q. Okay. He didn't have drafts of his**
 8 **journal on there or anything like that?**
 9 A. No, not to my knowledge, no. And I
 10 believe I would have been told that if that was the
 11 case.
 12 **Q. I would certainly hope so.**
 13 MR. ROCHE: Let's go ahead and mark this
 14 as Exhibit 46.
 15 (Deposition Exhibit 46 was marked.)
 16 **Q. (BY MR. ROCHE) And are you familiar with**
 17 **Exhibit 46?**
 18 A. Yes.
 19 **Q. And my understanding is that Exhibit 46**
 20 **is the training module for threat assessment for the**
 21 **2014-2015 school year; is that right?**
 22 A. This is essentially how we've done it
 23 since 2000 -- fall of 2011. I would have to look at
 24 the file name to know what year exactly. There were
 25 some small changes each year.

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1 **Q. Okay.**
 2 A. But essentially this is what we're --
 3 what we have been using from 2000 -- fall of 2011 to
 4 -- up until this year.
 5 **Q. All right.**
 6 A. So there's some changes made for this
 7 year as well.
 8 **Q. And if you'll jump ahead, there's a bunch**
 9 **of slides on a bunch of different topics, but I want**
 10 **to direct your attention to page 2414. It's titled,**
 11 **"Task No. 1."**
 12 A. Uh-huh.
 13 **Q. Okay. Actually, before we -- we can stay**
 14 **on that page, but before we get to these questions,**
 15 **can you tell me, is it mandatory for all school**
 16 **administrators to attend this training module at LPS**
 17 **now?**
 18 A. Yes.
 19 **Q. And when did attendance at this training**
 20 **module become mandatory for all administrators?**
 21 A. Well, the informal expectation, again,
 22 wasn't policy, but the informal expectation prior to
 23 last year or, I guess, up through last year was that
 24 every school sent a team of administrators and mental
 25 health staff and that they sent new folks who had not

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1 been trained yet were the priority. And this year we
 2 clarified that it is an expectation that
 3 administrators have to go in their first year and
 4 attend every year thereafter. And the same thing for
 5 mental health staff, must attend in their first year
 6 and attend every year following.
 7 **Q. And whose job is it to ensure or verify**
 8 **that all of the people who are supposed to attend**
 9 **this, actually do?**
 10 A. I think ultimately that would fall on
 11 their direct supervisor. Ultimately, it's the
 12 employee, ensuring that they attend the training they
 13 know they're required to attend, and secondarily their
 14 supervisor and ensuring that they attend what the
 15 expected trainings are.
 16 **Q. All right. Let's --**
 17 A. And I want to add that I also see that as
 18 part of my expectation as a district coordinator for
 19 this director, so . . .
 20 **Q. Well, using Arapahoe as obviously the**
 21 **focus did -- in the 2014-2015 school year, did all of**
 22 **the principals and assistant principals attend this**
 23 **training module?**
 24 A. Did all of them?
 25 **Q. Yes.**

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1 A. I don't believe every single one did,
 2 because some had been the year prior, but I know most
 3 of them did. Some of them, even if they had been the
 4 year prior, they came again. I'd have to look at
 5 records to tell you exactly who attended.
 6 **Q. Well, let's look at the slide on page**
 7 **2414 titled "Task No. 1."**
 8 A. Okay.
 9 **Q. And the first question that you ask as**
 10 **part of this training module is, "What sources of**
 11 **information does your school use to measure student**
 12 **perceptions of bullying and school safety," right?**
 13 A. Right.
 14 **Q. And do you recall what answers you got**
 15 **from the folks at Arapahoe High School to that**
 16 **question?**
 17 A. Well, again, this is not a -- it's not
 18 talk back. It's a small table discussion. So the
 19 format is -- the way that this training was designed
 20 from the different -- differently from the one that
 21 you saw earlier in the spring of 2011 was we really
 22 felt like we needed to integrate the concepts of
 23 danger, and so we're integrating threats, suicide,
 24 bullying, warning signs, and the interrelatedness of
 25 those in addition to kind of just general school

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1 culture and climate, which we felt was really
 2 important.
 3 So the idea here was, you know, we're
 4 starting to help schools really look at how these
 5 things are related. And so the method we did that was
 6 we would talk about these pieces and talk about
 7 bullying. So we would start with bullying and talk
 8 about bullying, and then we would say, Okay, you're
 9 going to have 15 minutes, 20 minutes, whatever at your
 10 table to talk about these questions. So these are
 11 discussion questions that they have at their table
 12 with the goal of them taking it back to their building
 13 and improving what they're doing.
 14 **Q. All right. Well, do the buildings then**
 15 **report back to you as the director of whatever the**
 16 **heck it is, student and emotional and behavioral**
 17 **services?**
 18 A. It's okay.
 19 **Q. Do they then report back to you what**
 20 **sources of information they're using to measure**
 21 **student perceptions of bullying and school safety?**
 22 A. Not in a written form. This year we are
 23 implementing -- we are starting for the first time
 24 more of a written kind of, Here's the summary of what
 25 you're doing in your building as a way to help

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1 principals organize all of the many things they have
 2 to do and think about the range of CPR/first aid
 3 training, an Epipen for allergies and seizure
 4 training, and AED training. And so we're trying to
 5 figure out ways to help principals really organize
 6 that, in addition to threats, suicide, child abuse,
 7 juvenile sex offenders.
 8 You know, we're trying to organize that
 9 in a way -- so this year will be the first year we're
 10 really trying to get written documents from them. But
 11 prior to that, no, we didn't require written
 12 documents. The principals would report in their
 13 meetings with their supervisor and the director of
 14 secondary education, Here is what we're doing. And if
 15 they had a -- if they were a positive behavior school,
 16 they would be working with their PBIS coach around
 17 these things as well.
 18 **Q. All right. Same with respect to question**
 19 **No. 2 on this slide that relates to, "What is your**
 20 **school doing to teach students the expectations and/or**
 21 **skills related to bullying? Is it clear to them how**
 22 **to report bullying behavior?"**
 23 A. Same answer.
 24 **Q. That was handled in the same fashion?**
 25 A. Yes. I will say that one difference on

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1 the third one is that --
 2 **Q. Yes.**
 3 A. -- we do have a very specific guidance
 4 around following the office of civil rights guidance
 5 around addressing and documenting bullying and
 6 harassment. And so we had a -- it's probably in your
 7 documents as well, a guidance sheet that talks about
 8 how we have to -- or we're mandated to respond based
 9 on situations of bullying and harassment based on
 10 state law and federal law.
 11 **Q. Okay.**
 12 A. So we went through that with staff as
 13 well. And that's -- I know it's referred to in here
 14 earlier.
 15 **Q. It is. Jump ahead, if you would, to page**
 16 **2426, it's the gathering information slide.**
 17 A. Yeah.
 18 **Q. And you can see at the bottom of this**
 19 **slide there's a reference to, "Records and Tracks"?**
 20 A. Correct.
 21 **Q. Do you see that?**
 22 A. Yes.
 23 **Q. What do you mean by records and tracks?**
 24 A. So this is our attempt to -- and, again,
 25 this was really our attempt to help people really

205	<p>1 conceptualize what these different things are, these 2 different methods of getting information. So we were 3 trying to help people understand that concept of an 4 interview is different than an inquiry. So an 5 interview -- and, again, these are words that we 6 picked.</p> <p>7 Interview, meaning we're asking specific 8 questions of people who may have critical information. 9 An inquiry would be something where we may be saying 10 to teachers, Hey, has anybody noticed anything 11 different or concerning about this kid. And we're not 12 necessarily telling them that this kid is going 13 through a threat assessment or, you know, suicidal, 14 but we try to build a culture in our school where it's 15 okay to send an e-mail to staff saying -- you know, 16 specifically we're talking about a student's teacher.</p> <p>17 So in elementary school, that's a little 18 easier. Middle and high school we're talking about 19 more teachers but saying, Hey, can you give us 20 feedback on how this student is doing. Have you 21 noticed anything concerning or off about this student 22 lately. And then, again, records and tracks is where 23 we're really talking about another source of 24 information being what documents do we have to review 25 from prior schools or private evaluations, what</p>	207	<p>1 then those also might have some notes in the 2 counseling log that -- those are typically kind of 3 more case management where somebody will go in and 4 say, We did a meeting on this day, here is who we met 5 with.</p> <p>6 Q. Okay. And who has access to the counseling tab and the discipline tab on the Infinite Campus Web site with respect to any given student?</p> <p>7 A. Typically it's the counselors, the 8 administrative staff, and then sometimes they also 9 would include maybe their security staff or other 10 specific staff in the building, instructional coach or 11 something like that. But it's typically a smaller 12 group that had access to that tab because it includes 13 more confidential information, such as child abuse 14 reports or --</p> <p>15 Q. And now you're talking about the counseling tab?</p> <p>16 A. Yeah, is that what you were referring to?</p> <p>17 Q. I was going to ask about both, but I wanted to make sure --</p> <p>18 A. That's the counseling tab, yes. 19 Actually, discipline is the same. So discipline is 20 the same group of people typically.</p> <p>21 Q. So administrators, counselors,</p>
206	<p>1 information can we gather online or do we have online 2 or things that kids have brought in or parents. 3 That's how we train to it.</p> <p>4 Q. But as I understand it, even now it is not standard protocol or a requirement as part of threat assessments within LPS for the team to look for or look at a student's social media presence?</p> <p>5 A. I would say that it has become routine 6 procedure for myself and our security department to do 7 that, which is -- as well as the Google accounts. And 8 in some cases the building team are also taking the 9 lead on that, but we have taken that on as more of a 10 district source of information.</p> <p>11 Q. Okay. And logistically when a threat assessment is done, what information about it is made available on Infinite Campus and to whom?</p> <p>12 A. Our expectation and guidance on that is 13 if it's a low-level threat, at a minimum that needs to 14 go into the counseling -- what we call our counseling 15 contact log that documents any kind of counseling 16 entries, miscellaneous entries that the counselors or 17 administrators put in. If it's a medium or high 18 level, that gets documented in the discipline tab 19 under threat assessment as a resolution to their 20 behavior. Same thing for high level. That's -- and</p>	208	<p>1 potentially campus security?</p> <p>2 A. Right. Instructional coach, maybe a few 3 other leaders in the building that have access to 4 those confidential tabs.</p> <p>5 Q. And do students' teachers have access to the counseling information or the disciplinary information on the students in his or her class?</p> <p>6 A. Not through Infinite Campus. That would 7 be something they would have to request or the 8 administrator would have to share with them 9 proactively, but not as part of a digital access.</p> <p>10 Q. And under what circumstances would a teacher be provided access to a student's disciplinary or counseling records?</p> <p>11 A. Well, again, in a couple specific 12 situations, one would be if they have a need to act 13 based on that. Two would be if they were involved in 14 a situation, and it wouldn't be that they would be -- 15 give access to the digital Infinite Campus system. It 16 might be more that they have access to learn about a 17 specific situation that pertained to them or their 18 classroom, and then, again, like we talked about 19 earlier, if they have a need to help follow up on a 20 safety and supervision plan, or under our code of 21 conduct, it is specified that the principal can share</p>

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1 disciplinary information with teachers and staff if
 2 they believe that there is a danger or, you know, a
 3 safety concern of a serious nature.

4 **Q. Okay. So here's a question that I have.**
 5 **I've heard a lot about an information vortex that is**
 6 **so important to the threat assessment process. Have**
 7 **you heard of that?**

8 A. Uh-huh.

9 **Q. What is an information vortex in the**
 10 **context of a threat assessment?**

11 A. Well, essentially, how we train is that
 12 there needs to be someone who leads this process who
 13 is the point person for gathering that information so
 14 that that person has all of the information, not just
 15 pieces and parts.

16 **Q. Okay. In the case of Karl Pierson, there**
 17 **were a lot of people at individual -- snippets of**
 18 **information that were, for lack of a better term,**
 19 **siloed, but nobody knew everything, right?**

20 A. I don't know if that's fair to say. I
 21 think certainly in hindsight we know that in any
 22 situation, but I think certainly a lot of information
 23 was given to Kevin and Esther. But, you know, there
 24 was information from Tracy Murphy. There was
 25 information from Mark Loptien. There was information

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1 from Karl and his parents. But, again, in hindsight,
 2 we know that there was much information out there that
 3 we didn't know.

4 **Q. And there was a bunch of information that**
 5 **came after the fact but -- after the threat**
 6 **assessment, but before the shooting that wasn't**
 7 **communicated to a central person. For instance,**
 8 **looking at guns in the cafeteria. For instance,**
 9 **pounding on Vicki Lombardi's door. Those kind of**
 10 **things weren't transmitted to this central information**
 11 **vortex at the time, were they?**

12 A. Well, I believe some were and some
 13 weren't.

14 **Q. Right. Some were and some weren't?**

15 A. Yep.

16 **Q. So there were snippets of information**
 17 **that didn't get synthesized through some central**
 18 **vortex, right?**

19 A. Correct.

20 **Q. And that's one of the shortcomings of the**
 21 **process here, right?**

22 A. Correct.

23 **Q. So given the new system that is in place**
 24 **where information is maintained in the counseling tab,**
 25 **information is maintained in the discipline tab, and**

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1 **the teachers don't have access to that, my specific**
 2 **question is this, how do teachers provide information**
 3 **to that information vortex if they don't have access**
 4 **to what's already there?**

5 A. Well, they -- that's, again, part of what
 6 the building has to come up with in terms of how are
 7 we communicating. Again, it is a catch 22 in some
 8 senses, because you can't broadcast everything that
 9 happens, every discipline incident that every kid has
 10 in the building to every staff. But we do want the
 11 staff to be aware of what the warning signs and
 12 concerns are so that they can come share them.

13 I think in our current practice, what
 14 we've gotten better at doing is telling the
 15 administrator who is in charge of that process, Hey,
 16 have you connected with, at least, the kid's current
 17 teachers to find out have they had any concerns or
 18 seen anything unusual or concerning. Even if we're
 19 not saying, this kid is the subject of a threat
 20 assessment at this point. And depending on how that
 21 rolls out, we may go back and interview it again
 22 further or we might rule out that we don't need to do
 23 that.

24 But that is a piece that we have changed
 25 is to, you know, say, you know, at a minimum you need

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1 to have someone who knows the kid well as a part of
 2 that team and then, again, using this term "inquiry,"
 3 that we're really trying to use people to use those
 4 inquiries as a way to get some information without
 5 necessarily breaching that this kid is doing a threat
 6 assessment.

7 **Q. Okay. Continuing on in Exhibit 46, after**
 8 **the slide about gathering information, there appears**
 9 **to be part of an actual threat assessment?**

10 A. Yes.

11 **Q. And is this, in fact, part of a real**
 12 **threat assessment that was done, or is this a mockup**
 13 **of one?**

14 A. This is part of a real one that was done
 15 with names redacted.

16 **Q. Yes, of course. As part of this training**
 17 **module, did you actually have the attendees walk**
 18 **through how to fill out this form and perform a live**
 19 **threat assessment?**

20 A. Not line by line, but, yeah, we use this
 21 as an example to show how you can use the form to
 22 collect information. We use it as an example. So
 23 what we would do in the training is talk to folks
 24 about, What do you see on this form, what don't you
 25 see, what other questions do you have based on what

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1 you see. How would you look at this form if you were
 2 an outsider coming in to review this situation. So,
 3 again, it is training to help people to think
 4 critically, to help people think about what they know
 5 and what they don't know.
 6 **Q. All right. I'm looking at a slide 2446,**
 7 **which is the Safe2Tell slide.**
 8 A. Yes.
 9 **Q. Has LPS changed its training for staff or**
 10 **students on a Safe2Tell program since the shooting?**
 11 A. I would say in small ways, not
 12 substantially, but we certainly have made a strong
 13 focus on especially using October, which is Colorado
 14 Safe Schools Month, as a way to remind our entire
 15 school community around Safe2Tell. We have been a
 16 part of the rollout of the new app for Safe2Tell. So
 17 we've been one of the pilot districts for that and we
 18 had staff do some work, and, again, not in a
 19 standardized way with every kid and every class, but
 20 getting some feedback on the use of that app.
 21 **Q. And how is that app being received by the**
 22 **kids?**
 23 A. You know, I think it's still a little too
 24 early to tell. We are getting -- we've probably had
 25 -- since we started -- the apps been in use, we

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1 probably had -- oh, gosh, I hate to give a guess, but
 2 I would say maybe a third of our reports have been
 3 through the app. I think, depending on the kid, some
 4 kids are even nervous to have the app on their phone
 5 because they don't want to look like, you know,
 6 something is wrong with them or a snitch or, you know
 7 -- but I would say the phone calls are still the
 8 primary. But I think eventually the app will probably
 9 be more useful.
 10 **Q. And is the app available in all of the**
 11 **high schools within the Littleton Public School**
 12 **District?**
 13 A. Yeah. The app is just basically another
 14 reporting method so the kids just have to download it
 15 on their phone. So as soon as -- as long as they have
 16 it on their phone, we pull it up as a district and
 17 they can report.
 18 **Q. I guess my question is, has it been**
 19 **rolled out in some of the schools in the district or**
 20 **all of the schools in the district?**
 21 A. So like this fall, we sent out to each
 22 school a packet of information with posters and
 23 information about, you know, here is what it is. Here
 24 is the posters to put up in your school. We also set
 25 the expectation that every school during October has

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1 to do a reminder to students, staff, coaches around
 2 Safe2Tell and how to report, not just Safe2Tell, but
 3 we coach three methods. We coach talk to an adult
 4 that you care about at your school or that you trust,
 5 LPS 24/7 security and Safe2Tell.
 6 **Q. And that's a training module that you use**
 7 **with every school as part of --**
 8 A. Again, it's not a training module. It's
 9 resources, and then it's an expectation with schools
 10 that they use -- and what we tell them is they have
 11 different methods they can use. They can do it as a
 12 part of a homeroom discussion. They can do it as part
 13 of an all-school assembly. They can do it as a part
 14 of morning announcements, you know, every morning
 15 during Safe Schools Month, but we really try to use
 16 October as that month.
 17 One of the challenges for schools is we
 18 have red ribbon month and yellow ribbon month, and we
 19 have all of these different things. And so we try to
 20 use October as a time to say, Let's remind folks about
 21 all of these pieces that keep schools safe. So that's
 22 when we provide guidance and suggested activities to
 23 school.
 24 And, again, they try to fit those into
 25 things that are already part of the school culture.

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1 So, for example, you know, for years Arapahoe did it
 2 through their You Matter campaign or they had a group
 3 called the tribe or their student council who would
 4 take lead in some of those things. Other schools
 5 would do it in a little different way.
 6 **Q. Jumping ahead to the next slide. We**
 7 **probably covered some of this, but this slide is**
 8 **titled "What Works"? And the first bullet point says,**
 9 **"School community is aware of Early Warning Signs &**
 10 **reporting procedures." Do you see that?**
 11 A. Yes.
 12 **Q. And I'm assuming that your point on that**
 13 **slide is that one of the things that works is making**
 14 **sure the school community knows what the early warning**
 15 **signs are and how to report them, right?**
 16 A. Yes.
 17 **Q. Does LPS do anything to measure whether**
 18 **or not the school community is aware of the early**
 19 **warning signs and the reporting procedures?**
 20 A. No. I guess, let me add to that. The
 21 only piece that I believe would speak some to that
 22 would be the tell survey. So there's an every other
 23 year survey of school staff that's required. So all
 24 of the teachers in a school get to do an anonymous
 25 survey about their school that asks them some

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1 questions like, Do you feel like administration
 2 responds appropriately when you have concerns? Do
 3 you, you know, know how to get help for students? So
 4 that's one way that's a survey of staff. But that's
 5 only, again, faculty, basically faculty. And I don't
 6 even know -- actually, off the top of my head, know if
 7 that includes nonfaculty staff like paraprofessionals.

8 **Q. Okay. Take a look at Exhibit 7, if you**
 9 **would. Exhibit 7 is, as I understand it, a new threat**
 10 **assessment guidance document that was prepared the**
 11 **summer after the shooting in December of 2013; is that**
 12 **right?**

13 A. Correct. This one was the one that was
 14 in effect last school year. We did do an update this
 15 fall, some additional updates, but this was generated
 16 that summer and used for last school year up through
 17 this month when we do our new trainings.

18 **Q. All right. And do you know who prepared**
 19 **this document?**

20 A. I did.

21 **Q. And, again, the very first checkpoints in**
 22 **the key concepts for threat assessment is to ensure**
 23 **that school, staff, students, and parents needs to**
 24 **know the basic warning signs and how to report them,**
 25 **correct?**

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1 A. Correct.

2 **Q. And I know we've hit on this subject a**
 3 **number of times, but I guess my question is, it sounds**
 4 **to me like the training on those basic warning signs**
 5 **is left to the discretion of the building leadership;**
 6 **is that right?**

7 A. Largely, yes.

8 **Q. And from what I gathered from the last**
 9 **slide we discussed, LPS doesn't do anything to measure**
 10 **whether or not students, staff, and parents, actually**
 11 **know what those warning signs are or how to report**
 12 **them, correct?**

13 A. Not on a regular basis. I mean, here and
 14 there different things that schools might do. Focus
 15 groups or discussions with kids, but not on a regular
 16 basis districtwide.

17 **Q. And, I guess, my question is, if this is**
 18 **such a key factor in making sure that threat**
 19 **assessments are effective, why isn't the training on**
 20 **this more formal, required, measured, any of the**
 21 **above?**

22 A. That's a good question. I think in the
 23 scope of things that schools have to do, this is one
 24 of those things that, again, is probably least legally
 25 required and legislated. And I think it's one of

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1 those things that doesn't happen as frequently as
 2 probably some other things happen. It's not been on
 3 the highest priority on a district level.

4 **Q. So if I'm hearing you correctly, if this**
 5 **type of training and measurement were legally**
 6 **required, then LPS, and presumably the other school**
 7 **districts, would devote more resources to it?**

8 A. Well, I definitely think it makes it more
 9 of a priority. I do think our district cares very
 10 much and values student safety very highly. And I
 11 pride myself in leading that effort in my ways and in
 12 my role. And I do think all of our building leaders
 13 -- I have not met a building leader yet who discounts
 14 that this is important, and I think if you talk to
 15 each one of them, they would describe to you how they
 16 do this. I think what is not there is a standardized
 17 method and way to do this to ensure that every kid
 18 gets the same exact information. And, again, we're
 19 trying to balance also using their normal school,
 20 culture, and climate, things they have going on to
 21 support that. So it's --

22 **Q. Okay. Let's move on.**

23 A. -- the best way I can explain it.

24 **Q. Let's move on to the, I guess, third**
 25 **check point on the key concepts for threat**

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1 **assessments, which discusses behavior patterns.**

2 A. Correct.

3 **Q. And it says, "Behavior patterns are**
 4 **better indicators of risk than a student's words or**
 5 **diagnoses," right?**

6 A. Correct.

7 **Q. And since you wrote that, I assume you**
 8 **believe it?**

9 A. Yes. And, again, this is based on --
 10 this document came out of the administrative review we
 11 did in June of that year where we brought folks
 12 together and asked for some feedback. And then,
 13 again, we got feedback from our building
 14 administrators and mental health staff, and this is
 15 one of the concepts that we felt was important to make
 16 sure it was on the top of that.

17 **Q. And who trains building leadership on**
 18 **what these different types of behaviors are, for**
 19 **instance, boundary probing behavior?**

20 A. That's included in our updated training.
 21 And, again, that comes out of --

22 **Q. So that would be in Exhibit 46?**

23 A. Not that one. The one that is this fall.
 24 So '15-'16. And, again, we've used that concept. So
 25 we -- I can't -- I'd have to look at the document to

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1 see if it's in this one. I think it is in this one.
 2 So I think it was included in the last couple years,
 3 but we do a little more formal inclusion of it in our
 4 new module this year. But, again, that came out of
 5 our review and some suggestions from John Nicoletti,
 6 who was the consultant we used in that review who used
 7 this language to talk about an additional way to look
 8 at behavior patterns.
 9 **Q. All right.**
 10 A. So it's probably in here, but I don't
 11 know exactly. Yeah, so it's on page 2440 of this.
 12 **Q. And then down below -- well, strike that.**
 13 **"Inter-agency partnership is essential**
 14 **for effective violence prevention." Do you see that**
 15 **as your last key concept?**
 16 A. Yes.
 17 **Q. And, again, I assume you believe that to**
 18 **be true since you wrote it?**
 19 A. Yes.
 20 **Q. What interagency partnerships does LPS**
 21 **have that is focused on violence prevention?**
 22 A. Well, we have a pretty strong
 23 relationship with both of our law enforcement
 24 entities. The Arapahoe County Sheriff, Littleton
 25 Police Department. We have very close ties with

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1 Arapahoe/Douglas Mental Health because they're a
 2 public mental health center. It serves our Medicaid
 3 population as well as other students and families. We
 4 work closely with the Department of Human Services, if
 5 that's indicated. We also, on occasion, use John
 6 Nicoletti as a consultant, like we did in this
 7 situation, to bring him in to help us look at our
 8 procedures. And I would say those are probably the
 9 biggest ones in terms of the interagency partnerships.
 10 **Q. Does LPS have an interagency information**
 11 **sharing agreement with the Arapahoe County Sheriff's**
 12 **Office or the Littleton Police Department?**
 13 A. I believe there is some type of MOU, yes.
 14 **Q. And do you recall when that was signed?**
 15 A. I don't know.
 16 **Q. And do you have a work understanding of**
 17 **what that MOU permits LPS to do or share with those**
 18 **law enforcement agencies?**
 19 A. I can't recall exactly what's in there
 20 related to information sharing. I do know that we're
 21 in the process of reviewing and trying to draft new
 22 MOU's for more clarity. I know what our practice is,
 23 but I can't speak to what's in the agreement.
 24 **Q. Sorry, I'm just stretching. Well, what**
 25 **is the practice at LPS as it related to information**

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1 **sharing with law enforcement?**
 2 A. Well, our practice is that -- well, let
 3 me just take it kind of section by section. So when
 4 it comes to just talking about what's going on in the
 5 school, we are able to do that with our school
 6 resource officers. They, in the past, have not had
 7 access to our Infinite Campus system. So they would
 8 have to ask a staff member, Hey, can you look up this
 9 student's address or information -- or information for
 10 me.
 11 This fall we did give them basic
 12 demographic access, so they can't necessarily see all
 13 of the kids' records, but they can look up contact
 14 information. But our practice has been at any time we
 15 can work with a law enforcement officer as a
 16 school-initiated investigation.
 17 So the way our procedures and policies
 18 work is if it is a school investigation and led by the
 19 administrator, we can request a school resource
 20 officer be there to help us search or be there to sit
 21 in when we investigate or interview a student. But
 22 the minute it becomes led by that officer, it now
 23 becomes a law enforcement investigation. And they
 24 have to meet all of the Miranda warnings and get all
 25 of the parents involved. I don't know if that's what

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1 you're looking for.
 2 MR. ROCHE: I will ask again, can I get a
 3 copy of whatever that MOU is? I know a while back we
 4 had talked about that.
 5 MR. EVERALL: I sent it to you.
 6 MR. ROCHE: No, what you sent me actually
 7 was an agreement between Arapahoe County and the
 8 school saying James Englert was authorized to be
 9 employed there. It was a different document entirely.
 10 MR. EVERALL: I'll ask again.
 11 MR. ROCHE: Okay. Thanks.
 12 **Q. (BY MR. ROCHE) Now, in Exhibit 7, which**
 13 **is this new guidance document --**
 14 A. Yes.
 15 **Q. -- there's a set of tight or required**
 16 **steps that need to be followed in threat assessments,**
 17 **and then there is a loose or suggested set of steps**
 18 **that can be taken with respect to certain threat**
 19 **assessments, right?**
 20 A. Yes.
 21 **Q. And what training do you provide on when**
 22 **the tight requirements are sufficient and when the**
 23 **loose or broader steps ought to also be taken?**
 24 A. Well, again, this came out of a
 25 recommendation of that group that met and saying one

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1 of the things they thought would be helpful, all of
 2 the folks in there, is to give some more guidance
 3 around, hey, these are things that need to be a part
 4 of every threat assessment. And, again, this loose,
 5 tight is a format our district has used in many other
 6 subjects. So this is a format that the principals
 7 would be used to in terms of tight and loose. And so
 8 basically my understanding of it, I might have
 9 different perspectives, but my understanding is it
 10 provides some guidance to building leaders around,
 11 this is what you need to be doing, and this is what
 12 you can also choose to do and other options that are
 13 there.

Q. Right. And I understand that, and my question is, what guidance do you give to building leadership on why they should move beyond what is required into what is suggested?

A. Well, it's box by box. So when we went through this with all of the principals and districtwide principals, meaning, that's what we went through with them and answered any of their questions and kind of walked through box by box and got their feedback and I get it. So we've continued to try to improve it and do better. And this fall in our new training, we rolled out a few additional changes in

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1 here based on some of their feedback and our guidance.

Q. All right. And if you'll look at Exhibit 17, which I think is in the next book, you'll see this administrative review of LPS threat assessment protocols --

A. Yes.

Q. -- from June of last year?

A. Yes.

Q. And this is the review that led to Exhibit 7, correct?

A. Correct.

Q. And there were a number of participants in this administrative review of the threat assessment protocols, correct?

A. Correct.

Q. And this review was prompted by what happened at Arapahoe High School in December of 2013, right?

A. In part, yes.

Q. And one of the objectives was to examine the current LPS threat assessment data procedures and training processes, right?

A. Correct.

Q. What conclusions did you reach with respect to your examination of the current LPS threat

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1 **assessment data procedures and training processes?**

A. Well, basically, that's where I reviewed
 2 the information with the folks in the room, and other
 3 people had a voice as well in terms of the other roles
 4 and leadership in the district. And essentially what
 5 the group I think came to consensus on was that our
 6 process is good, that we do -- our training is
 7 effective. I guess effective is probably not the best
 8 word. Our training is appropriate. And based on, you
 9 know, the kind of current research and practice, and
 10 in terms of data and those things, we didn't have a
 11 specific comparison, so we didn't have information to
 12 compare our district to other districts or anything
 13 like that. We basically used No. 2, that summary is
 14 basically a way for the group to understand what we
 15 currently are doing.

What you see down at the bottom is what the major recommendations were from the group in terms of their thoughts. So I'm trying to recall if there is any other big major pieces. We definitely talked about John Nicoletti's four-stage model, which is part of what resulted in this as well as some of our districtwide planning and district review team.

Q. Now, had you trained your school psychologists and counselors prior to this on

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1 **Nicoletti's four-stage model?**

A. No. And the four stage model is really
 2 not necessarily for them. It's more for us as a
 3 district to look at how do we -- how do we approach
 4 these kind of situations in terms of prevention. And
 5 so he -- you know, he has this model in terms of what
 6 are you doing in terms of the warning signs, what are
 7 you doing in terms of when the kid starts to show
 8 signs. And he has some terms for them right here, the
 9 pre-event, event threshold, horizon, post events. So
 10 these are the terms we're talking about.

Q. Going back to objectives in the examination of LPS's current threat assessment data procedures and training processes, did the group come to any conclusions that there were shortcomings in those procedures in training processes?

A. There was certainly recommendations. I don't remember people saying, you know, you have to stop doing this right now. I mean, none of our law enforcement partners were saying absolutely you're missing this piece. It was a constructive conversation about what are we doing, how can we continue to get better and what pieces do we need to improve our overall district process.

Q. Well, it's clear to me that Esther Song

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1 and Kevin Kolasa had substantial shortcomings in the
 2 preparation of the threat assessment they did on Karl
 3 Pierson. They didn't even follow the written
 4 instructions on the template, for instance, writing
 5 down the evidence that supports each checked box and
 6 sending the document to you. Did that raise any
 7 questions in anybody's mind that the training modules
 8 that were being used on how to fill this form out
 9 weren't being as effective as they could be?
 10 A. I'm sure we had some conversation about
 11 the form and some about the training. Again, I think
 12 the general concepts of this is that it's a fine
 13 balance between trying to train people to do a form
 14 exactly perfectly and get the concept of what you're
 15 looking for. And so I don't think anybody in the room
 16 felt like, you know, spending hours and hours in a
 17 training and making sure they know exactly how to fill
 18 out every box and do the evidence is the point of the
 19 training. The point of the training is, Can we help
 20 people get those big principles. Do we help them
 21 understand how to get the information they need and
 22 where to look, what questions to ask.
 23 **Q. Candidly, that's one of my big concerns**
 24 **here is I spent all day Friday asking Esther Song, Did**
 25 **you look for this, did you look for that, and the**

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1 answer I got over and over and over was, Well, if
 2 teachers had concerns, they were supposed to bring
 3 that to me. And that is about as far from an
 4 inquisitive skeptical mindset as I can fathom. So
 5 that's my question. Was that problem recognized
 6 during this administrative review?
 7 A. Well, this administrative review did not
 8 look at the details in depth of this incident. This
 9 administrative review -- and, again, it was purposeful
 10 in an administrative review, it was not specific to
 11 this incident.
 12 **Q. And I understand that.**
 13 A. But we did talk about the concept broadly
 14 in terms of how are we training staff, how do we make
 15 sure that they know how to do this process properly.
 16 If that answers your question.
 17 **Q. And I understand that this was not a**
 18 **review of the adequacy of the threat assessment that**
 19 **was done on Karl Pierson. So I'm not meaning to**
 20 **suggest that it was, but that does raise an**
 21 **interesting question. Was there any critical review**
 22 **done of the threat assessment evaluation or process**
 23 **that was performed on Karl Pierson in the fall of**
 24 **2013?**
 25 A. Yes.

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1 **Q. And who participated in that review?**
 2 A. The primary one, I was involved in our
 3 leadership team, our learning services team where we
 4 went and looked back at what we knew about the
 5 situation and kind of did our own internal summary
 6 about our thoughts about that process.
 7 **Q. And when you -- you said the something**
 8 **leadership team? What leadership team, the**
 9 **district --**
 10 A. It's called a learning service team.
 11 It's all the directors, all my colleagues.
 12 **Q. Okay. And when did that take place?**
 13 A. I don't have the exact date, but it was
 14 quite a while after the incident. I'd have to say
 15 either -- it could have been as late as early this
 16 year, maybe spring.
 17 **Q. Spring of 2015, so six or eight months**
 18 **ago?**
 19 A. Yeah. The only formal discussion that I
 20 was a part of.
 21 **Q. And tell me about that review of the**
 22 **threat assessment that was performed on Karl Pierson.**
 23 A. Well, again, it wasn't a review
 24 specifically of line by line through that threat
 25 assessment. It was --

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1 **Q. And I understand that. What was that**
 2 **process?**
 3 A. It was basically our team sitting down
 4 and trying to take stock and debrief our perceptions
 5 of what we thought happened, try to put some pieces
 6 together and really look at what things we thought
 7 were done well. And, again, this is at a larger
 8 level. This is not at an individual staff level.
 9 **Q. Understood.**
 10 A. It was more kind of a -- kind of a
 11 debriefing discussion of our team.
 12 **Q. And did that -- who all participated in**
 13 **that? It was you and who else?**
 14 A. The other colleagues of my team, which
 15 would be the assistant superintendent, Connie Bouwman;
 16 director of elementary and secondary education, both
 17 of those folks.
 18 **Q. And who are they?**
 19 A. Clay Abila and Kathleen Ambron.
 20 **Q. Anyone else?**
 21 A. Melissa Cooper.
 22 **Q. Who else?**
 23 A. I believe Diane Leiker, our
 24 communications director was in there part of the time
 25 and Mark Lindstone. Possibly Mike Porter, our other

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1 IT director.

2 **Q. Scott Murphy?**

3 A. No, Scott was not in there.

4 **Q. What about Mr. Jones down at the table?**

5 A. No.

6 **Q. What about Brian Ewert? He wasn't there**

7 **yet, was he?**

8 A. No.

9 **Q. What about anybody from Arapahoe High**

10 **School?**

11 A. No. And, again, this was a district

12 level -- the intent of it was not to do, you know, a

13 personnel review or a review of that specific threat

14 assessment. It was more a review of what's the

15 information that we know and what do we, as a

16 leadership team, believe happened. That was part of

17 it. And some debriefing of how everybody is doing and

18 where are we now kind of thing. So that's the best --

19 **Q. One of the things -- okay.**

20 A. -- summary I can give of it.

21 **Q. One of the things that happened in that**

22 **debrief was a review of what was done well and what**

23 **could be improved on as it related to the shooting**

24 **that occurred at Arapahoe High School in December of**

25 **2013?**

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1 A. Yes.

2 **Q. Okay. What were the conclusions of the**

3 **group about what went well that day. Not just that**

4 **day. But related to that whole tragedy?**

5 A. There was a lot. I mean, it was a couple

6 hour discussion, but I -- so I'm not going to be able

7 to recall every single thing that happened in there.

8 But I think if your -- your question was what went

9 well?

10 **Q. Yes. What was done well?**

11 A. I think some of those things were that we

12 believe that the staff did take it seriously and acted

13 immediately, didn't wait for a week or two to respond

14 to the concerns that were brought from Tracy Murphy

15 and Mark Loptien. We did feel that it was good that

16 they had interviewed Tracy Murphy and that his

17 perceptions were taken into consideration.

18 We also felt that the piece of asking the

19 family about the mental health concerns was a good

20 thing, that that question was at least asked and a

21 request to have a release form and that Esther did

22 have some follow-up, you know, at least conversation

23 via e-mail with Karl's mother was a good thing. We

24 confirmed that he did not have to be suspended, that

25 that was an administrator choice but had -- you know,

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1 obviously had some more conversations about the pros

2 and cons of that. Those are some of the major things.

3 **Q. And what about -- what were the major**

4 **things of things that could or needed to be improved**

5 **on?**

6 A. We've hit a lot of those today. I mean,

7 one was certainly that we believed there should have

8 been a follow-up to the request for release of

9 information to talk to Karl's mental health providers,

10 that that should have been proactive on our part. We

11 also believe that there should have been additional

12 inquiries to additional people. Also, that -- that

13 information about the gun viewing should have gotten

14 back to Kevin Kolasa as the central point person for

15 this assessment. So those are probably the big

16 points. There might be others that I'm not recalling.

17 **Q. Was there any discussion about whether or**

18 **not there should have been more comprehensive**

19 **monitoring or follow-up with Karl in the building?**

20 A. I believe we had conversation about, yes,

21 that we would have liked to see more intentional

22 communication, especially with the security team, and

23 we definitely acknowledged that it was good that there

24 was a follow-up meeting, and that it appeared that --

25 or that least in some people's perception that that

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1 issue felt resolved, according to what Tracy had

2 reported that he felt good with the arrangement of the

3 way that that happened and that he was okay with Karl

4 staying on the team.

5 So we were -- felt good about that,

6 however, we also would have liked to have seen someone

7 check in with Karl after he did not participate in the

8 speech and debate as he could of. He made the

9 decision not to attend meets and go, even though he

10 was allowed to. He wasn't allowed to practice, but he

11 was allowed to go to the meets and he didn't. There

12 wasn't a whole lot of meets at that time, so that's

13 kind of hard too. There wasn't really a lot of

14 opportunity, but certainly that's something we would

15 have liked to see.

16 **Q. Was there any discussion at this review**

17 **of the shooting about whether or not the group you**

18 **just described as getting together to discuss what**

19 **went well and what didn't and whether or not that**

20 **group should ask my clients what they thought went**

21 **well and what didn't?**

22 A. I don't know if we specifically had that

23 kind of a conversation. I think by this point, you

24 know, we were already well into the, you know, process

25 of how this is all played out. I mean, I can say it's

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1 certainly something we're interested in and I'm
 2 interested in. I think -- I'll just say one of the
 3 hardest parts for me about that is we haven't been
 4 together in this process, and it hasn't felt like a
 5 hand in hand, you know, walking through, what are we
 6 learning from this. So I can't say it was a
 7 particular point of discussion, but I can say that
 8 that team has, you know, had the Davis family in our
 9 minds the entire time.

10 **Q. Did this review process that you're**
 11 **describing result in some kind of document? Did you**
 12 **have any written conclusions, recommendations,**
 13 **findings?**

14 A. Folks had their own notes. You know,
 15 there has been one document that we worked on with
 16 Steve post to that, but not as a part of that
 17 discussion.

18 **Q. So this review did not -- well, strike**
 19 **that.**

20 I guess I'll ask, is the document that
 21 you're describing a privileged document?

22 MR. EVERALL: Yes.
 23 MR. ROCHE: Yes?
 24 MR. EVERALL: Yes.
 25 MR. ROCHE: Okay.

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1 **Q. (BY MR. ROCHE) In Exhibit 7, there's a**
 2 **list of next steps and recommendations, correct?**

3 A. Yes.

4 **Q. And I want to talk about a few of those.**
 5 **One is asking for clarification on legal issues**
 6 **related to student interviewing, student statements,**
 7 **SRO involvement, searches, et cetera. Do you see**
 8 **that?**

9 A. Uh-huh.

10 **Q. Was there a policy in place at LPS**
 11 **related to those issues prior to December 13?**

12 A. Yeah, we've had a code of conduct policy
 13 for a long time.

14 **Q. And has that code of conduct policy on**
 15 **those subjects changed since December of 2013?**

16 A. No.

17 **Q. I take it then the conclusion was that**
 18 **the existing code of conduct gave the school the tools**
 19 **it needed to perform an effective threat assessment**
 20 **even before December of 2013, correct?**

21 A. I don't know if we -- that was an
 22 explicit, you know, agreement. I would say, you know,
 23 it didn't come out as the number one priority to
 24 change that, but certainly one of the things we
 25 discussed was that there is a challenge in balancing

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1 reasonable suspicion, and then the probable cause for
 2 law enforcement in helping school administrators
 3 understand how that works and what their abilities
 4 are.

5 So that was the discussion is that's a
 6 hard thing. It's a hard thing for building
 7 administrators to know how to balance, and we don't
 8 want people on this side of the continuum to just jump
 9 to violating people's constitutional rights, but we
 10 also want people to know what their options and
 11 resources are. So that was the nature of the
 12 conversation.

13 **Q. All right. One of the things that has**
 14 **changed since the shooting is described here, and that**
 15 **is the development of a district level threat**
 16 **assessment committee review team to be a clearing**
 17 **house for incidents and monitor lists, cross-reference**
 18 **information, and names, et cetera, correct?**

19 A. Yes.

20 **Q. And you're the lead on that district**
 21 **level threat assessment committee; is that right?**

22 A. Well, the core of it is three of us. So
 23 there's a core group that meets -- and we call it the
 24 district danger review or safety review team. And we
 25 meet every Tuesday now. That was a part of the

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1 outcome of this as well. Prior to that, myself and
 2 Guy Grace would communicate on a regular basis, but we
 3 didn't have a regular meeting. We weren't looking at
 4 necessarily the same data and same lists. It was kind
 5 of incident by incident.

6 Now, he and I and Bryan Jesse, who took
 7 my old position of coordinator of student support
 8 services, we're the core team that meets every Tuesday
 9 and reviews every single bit of documentation that we
 10 have, crisis, discipline, child abuse, notifications
 11 from the district attorney, all of those things. And
 12 then we also, as a part of that process, have a
 13 second-tier review for threat assessments or other
 14 danger -- danger situations where, for example, if
 15 it's a -- the building determines it's a high-level
 16 concern or has a special circumstance, they can then
 17 request us to get involved, and we have a higher level
 18 meeting which then might also pull in additional
 19 people like a commander from law enforcement or mental
 20 health.

21 **Q. Sure. And has that process been**
 22 **effective in your mind?**

23 A. I do believe it has been effective.

24 **Q. And, as I understand it, beginning in the**
 25 **spring of 2014, you or somebody from that team has**

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1 **participated in all of the threat assessments that are**
 2 **done in the LPS system; is that right?**
 3 A. Well, we certainly have been notified
 4 that -- the new expectation is that they notify us
 5 anytime they start a threat assessment.
 6 **Q. Okay.**
 7 A. And so that has certainly helped, because
 8 now we're in a consulting role. We aren't necessarily
 9 on site for every single one. A lot of them -- I
 10 mean, certainly at Arapahoe being in a state of trauma
 11 and shock, you know, we provided a lot of support on
 12 site, and I was pretty much involved in every one
 13 there up through last year by request of, you know,
 14 Natalie and their team. But we're not in every single
 15 one on site, but certainly if it's, you know, a
 16 significant concern, you know, we're now notified
 17 immediately when they start the process.
 18 **Q. And when you either participate in a**
 19 **threat assessment or review one that has been done by**
 20 **others, do you take that opportunity to train the**
 21 **building administrators where that is going on on how**
 22 **to perform those threat assessments and review them**
 23 **with building leadership?**
 24 A. Yeah, I would say it's a coaching model.
 25 I mean, every incident is an opportunity for coaching.

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1 Every incident is a little bit different and presents
 2 its own unique challenges and issues, but that's my
 3 philosophy is every one is an opportunity for coaching
 4 and teaching.
 5 **Q. So how does that process work? You do a**
 6 **threat assessment or you review one that was done and**
 7 **you see a coaching opportunity? How do you do that**
 8 **coaching?**
 9 A. Since I've been reviewing these since
 10 2009, my process is when they come into me, they're
 11 not official until I've signed off on them. So you'll
 12 probably notice that in the corner, my signature is on
 13 every one that I've reviewed, and they're not signed
 14 off until I'm comfortable that I reviewed it and I
 15 know that my questions have been answered. So I see
 16 myself as kind of a quality assurance at the district
 17 level, and I have, since the beginning of this.
 18 What is new now is we have additional
 19 eyes. So I have those other two people who are also
 20 reviewing and asking questions. Guy brings a little
 21 bit more of a law enforcement security kind of aspect
 22 to it in training. And, again, we can pull in -- we
 23 have had a number of situations where we'll pull in
 24 police commander or the SRO to sit down and ask
 25 questions about a particular situation. But in

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1 general, if it's reviewing the document that they've
 2 sent in, that's what it looks like. And I would make
 3 a phone call back and say, Hey, I have these questions
 4 about A, B, C, you know, where's the teacher at in
 5 this. Who did you talk to, did you consider this, did
 6 you do a virtual search. And so that's kind of a
 7 follow-up coaching. And then I would say, you know,
 8 Here is the pieces you need to do and then get it back
 9 to me.
 10 **Q. All right.**
 11 A. Unless I was on site. If I was on site,
 12 I might be -- you know, in some cases obviously at
 13 Arapahoe, I was helping actually document them because
 14 I was helping run the process. In other situations, I
 15 might help coach them on certain pieces, and in other
 16 situations, I might just come for the meeting with the
 17 family where we're reviewing the draft of the document
 18 and getting more information from family or talking
 19 about what the action steps are.
 20 **Q. All right. Let's jump ahead in**
 21 **Exhibit 17 to page 4049, and it's the slide titled**
 22 **"Key Challenges Noted by LPS Staff."**
 23 A. Yeah.
 24 **Q. Do you recognize this slide?**
 25 A. Yes.

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1 **Q. Did you put this one together?**
 2 A. Yes, with some help from some other
 3 folks.
 4 **Q. And, again, this was part of that**
 5 **administrative review of the threat assessment**
 6 **protocols that LPS was using at the time of the**
 7 **shooting in December of 2013, correct?**
 8 A. I'm sorry, I was reading this while you
 9 were talking.
 10 **Q. This is part of the administrative review**
 11 **of the threat assessment protocol --**
 12 A. Yes.
 13 **Q. -- this slide?**
 14 A. The administrative review that we talked
 15 about, yes.
 16 **Q. And it's titled "Key Challenges Noted by**
 17 **LPS Staff," right?**
 18 A. Yes.
 19 **Q. My first question is, how was LPS staff**
 20 **asked about the challenges they face in performing**
 21 **these threat assessments?**
 22 A. Most of this feedback came from me
 23 meeting with the principals in the principals'
 24 meetings or with the mental health staff and those
 25 meetings and also from being in high school faculty

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1 and staff meetings. So certainly in the spring, I
 2 spent a lot of time at Arapahoe and had a lot of
 3 conversations with their staff, their teachers. Also
 4 was at other high schools and heard some feedback from
 5 them as well, in addition to just working cases in
 6 middle schools and elementary schools, as well as
 7 input, not from just feedback that I've gotten, but
 8 from other folks who were doing the same thing.

9 **Q. But there is no questionnaire --**
 10 A. No.

11 **Q. -- sent out to the administrators of the**
 12 **various buildings?**
 13 A. Not a written questionnaire, no.

14 **Q. Okay. And were the challenges that are**
 15 **described here voiced by administrators or teachers or**
 16 **counseling staff or all of the above?**
 17 A. I would say all of the above, and I'm
 18 trying to think back to your last question now. I
 19 think as part of our conversations, we did have a
 20 feedback form where people could write some feedback
 21 so there may -- and I think we may have provided that
 22 to you guys too, just a summary of what some of this
 23 feedback was, at least from the principals' meeting.
 24 But, yeah, this came as a compilation of
 25 administrators, mental health staff, and then also

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1 teachers and other staff.

2 **Q. Well, tell me, if you would, the first**
 3 **bullet point here notes that LPS staff believes it's**
 4 **difficult to choose a level of risk and it feels**
 5 **uncomfortable. Do you see that?**
 6 A. Uh-huh.

7 **Q. What can you tell me about that**
 8 **challenge?**
 9 A. I think that's the most difficult piece
 10 of this whole process, and I think -- when you think
 11 about the magnitude of the decisions that a
 12 school-based team is making -- and, again, the context
 13 I put this in is we're talking about a Secret Service
 14 and an FBI process that we're asking school staff to
 15 do. School staff that are not trained forensically
 16 like, you know, law enforcement is or Secret Service
 17 is. I think this feels very heavy to them. I think
 18 it feels like, shouldn't the police be making this
 19 decision or shouldn't, you know, somebody who does
 20 this for a living be doing this.

21 So I think that's their big concern, and
 22 they worry if they put medium, it's going to label a
 23 kid for life sometimes or if -- you know, they worry
 24 if it's high, then this kid may end up being arrested.
 25 They worry if they put low and something happens, then

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1 it's going to be on them. So this is a very common
 2 thing with this process is it feels very, very
 3 difficult for anyone on the school team to say, yes, I
 4 -- because they feel like by signing that that's the
 5 level that this -- level of concern that it then binds
 6 them ultimately to anything that ever happens. It's a
 7 constant challenge with the process.

8 **Q. Right. Because, quite rightly, they**
 9 **recognize this could be a life-and-death decision**
 10 **they're making, right?**
 11 A. I think that's part of it.

12 **Q. And in this case, it was, right?**
 13 A. I think in every case it could be a
 14 life-or-death decision. But I also think that we have
 15 to take in context that this is not -- this is not a
 16 process, and I tell folks in the training. We are not
 17 expecting you to be forensic experts. We can't --
 18 this is a screening process and an inquiry kind of
 19 process where we need to do our best to get the
 20 information that we can so that we can take the best
 21 course of action based on what we know and what our
 22 concerns are.

23 We can't expect that this is going to
 24 predict violence, and I feel like sometimes that's
 25 what staff feel like they're having to do is predict

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1 is this kid going to be violent or not. And we have
 2 experts and the Secret Service and FBI that can't do
 3 that, let alone school staff.

4 So that's -- as you're a trainer for
 5 folks doing this, this is one of the hardest pieces
 6 is, yes, you and as a school team, these are the
 7 things that you can do and that you should be doing,
 8 and, yes, it feels heavy, but we have to do it. And
 9 you have to do the best that you can and make the best
 10 judgment that you can. So that's always a challenge
 11 of the training.

12 **Q. Have you heard of anything called the**
 13 **SAVRY process?**
 14 A. The SAVRY assessment?

15 **Q. Yes.**
 16 A. Yes.

17 **Q. What is that?**
 18 A. I don't have in-depth knowledge. I've
 19 never been trained on administering it, but my
 20 understanding is it's more of a normed formal
 21 assessment tool that can be used to help -- I don't
 22 know if predict is the right word. I don't know if
 23 they would say it predicts, but to give you more of a
 24 scored version of how at risk is this kid for
 25 violence.

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1 **Q. Has LPS considered using that assessment**
 2 **tool as part of its threat assessment process?**
 3 A. We looked at that. We did look at that.
 4 We looked at the PETRA, which is another form of that
 5 kind of assessment. And our guidance from John
 6 Nicoletti, who is kind of our consultant expert, was
 7 that, you know, his experience and recommendation was
 8 that those aren't necessarily effective and that they
 9 confuse the waters even more. And I specifically
 10 asked him if he uses those, and he said no.
 11 **Q. All right. The second bullet point on**
 12 **this list of key challenges is --**
 13 MR. EVERALL: Mike, you've been going for
 14 about an hour and a half.
 15 MR. ROCHE: We can stop. That's fine.
 16 Take a few minutes.
 17 (Recess taken, 4:17 p.m. to 4:31 p.m.)
 18 **Q. (BY MR. ROCHE) One of the key challenges**
 19 **noted in the slide that we're looking at is the notion**
 20 **that mental health staff feel like they bear a hard**
 21 **burden in decisions. Do you see that?**
 22 A. Yes.
 23 **Q. And is that tied to what you said just a**
 24 **little bit ago about these are not forensic**
 25 **investigators doing this work?**

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1 A. Yeah, I think as I've done this process
 2 now for, you know, hundreds and hundreds of different
 3 situations, one of the really common themes is that a
 4 psychologist or social worker or counselor who is a
 5 mental health person on that feels like they bear a
 6 heavier burden because they're having to make the
 7 decision, is this kid mentally healthy, are they
 8 stable, that they have some training that other people
 9 on the team don't have, and so that feels like more
 10 pressure is on them.
 11 **Q. Well, isn't that exactly why that burden**
 12 **is put on their shoulders because they do have that**
 13 **specialized education and training and --**
 14 A. Sure. They have a role on that team,
 15 yeah.
 16 **Q. And isn't it true that Esther Song is, in**
 17 **fact, a forensically trained psychologist?**
 18 A. I don't know the specifics around her
 19 forensic training. My understanding is that she was a
 20 clinically trained psychologist and had worked for a
 21 forensic psychologist.
 22 **Q. So wouldn't you have expected her to do**
 23 **an even better job with this type of forensic**
 24 **investigation than a run-of-the-mill school**
 25 **psychologist given that forensic background?**

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1 A. Potentially.
 2 **Q. Did it raise any concerns in your mind**
 3 **that members of the mental health staff at LPS felt**
 4 **uncomfortable making hard decisions about the**
 5 **emotional well-being and mental health of the students**
 6 **in their care?**
 7 A. Well, I want to be fair to how to
 8 characterize that. I want to represent that the vast
 9 majority of our mental health staff do this and do it
 10 because they know it's good for kids and they -- you
 11 know, when we have conversations with them, it's not
 12 necessarily that they're coming in and saying, I don't
 13 want to do this. I don't want to have to do this.
 14 It's them saying, This is hard. Let's keep talking
 15 about it. Let's, you know, continue to learn. Let's
 16 continue to figure out how we make it a team process.
 17 And that's part of how this stuff results is trying to
 18 continue to get more -- provide more guidance and
 19 support to them, get better at supporting them in
 20 areas where they do feel nervous or concerned. But I
 21 believe the vast majority of our staff do this
 22 willingly and do it with all of their best intentions
 23 to do it well.
 24 **Q. And what was the outcome of this**
 25 **administrative review, at least as it relates to these**

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1 **two challenges that we are talking about now?**
 2 A. Well, obviously when we got into this
 3 document, we made a few more clarifications. And in
 4 this document one of the things that we have pushed
 5 very specifically, even more than we did before, is
 6 the role of the administrator, and then leading that
 7 process and making sure that it's clear that it's not
 8 just the mental health professional making that
 9 decision, that it's not the whole team looking at that
 10 one person saying, are they low, medium, or high.
 11 It's led by an administrator, but it was a team
 12 discussion.
 13 Another piece of that is we put a line on
 14 our new threat assessment form that says, summary of
 15 team decision. And the goal of that was to really
 16 force the team to come up with a statement together
 17 saying, Here is why we chose this level of concern.
 18 And we didn't do that prior. We instructed people
 19 that that's something they could write and give more
 20 clarity to, but we didn't have that as a requirement
 21 on the form. So that's another area we've tried to
 22 embody that piece that it's a team decision.
 23 **Q. All right. And another issue that is**
 24 **noted as a key challenge by the staff at LPS was**
 25 **confusion about notifying teachers and other staff,**

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1 **right?**
 2 A. Yeah.
 3 **Q. Who gets notified, how do they get**
 4 **notified, when do they get notified, those kinds of**
 5 **things?**
 6 A. Right.
 7 **Q. How did this group address that**
 8 **confusion?**
 9 A. The biggest rule would be, again, this
 10 guidance document where we made some specifics to
 11 that, and, again, as I mentioned, it's updated this
 12 year even more so to even a deeper level of clarity.
 13 I think the group -- ultimately the group was talking
 14 about, you know, that we have to respect
 15 confidentiality laws, FERPA, and those kind of things
 16 and basic legal procedures. Law enforcement has to
 17 follow their procedures. But that we need to give
 18 additional guidance to administrators and teams around
 19 what and how they should share. So that's a part of
 20 what we put into here.
 21 **Q. All right. And so one of the things that**
 22 **came out of this confusion was a requirement that all**
 23 **of a student's teachers be notified when a threat**
 24 **assessment occurs, correct?**
 25 A. Well, it's more nuance than that. It's

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1 more specific than that. So in our guidance document,
 2 the first guidance document we put out, if you go into
 3 that, it talks about who else in the school should be
 4 told about. And initially our guidance said any staff
 5 person who has a need to act should be notified, which
 6 was our original clarification, any student or staff
 7 who is a potential target. And then we said any
 8 student or staff who has a need to act should be
 9 notified, for example, all of the current teachers
 10 should know, since they have a part in monitoring the
 11 safety plan.
 12 However, that wasn't specific enough
 13 guidance, which is why we changed it this year,
 14 because if it's a low-level concern, you may not have
 15 a specific safety plan that a student is -- that is
 16 being monitored by those teachers. So we still -- we
 17 still have that conversation going. It's still an
 18 active, continuous improvement process and still
 19 continues to get legal guidance around that. What it
 20 says now is that in any medium- or high-level threat
 21 when there's a safety and supervision plan, every
 22 teacher should be notified in low level --
 23 **Q. Well, let me -- I apologize for**
 24 **interrupting, but I really do want to get to the**
 25 **bottom of what LPS is doing now. Are the teachers of**

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1 **a student who is the subject of a threat assessment**
 2 **told about that threat assessment now?**
 3 A. In every situation where it results in a
 4 medium or a high, they are notified that that student
 5 had a threat assessment and what the safety and
 6 supervision plan is. With a low-level concern, not
 7 necessarily.
 8 **Q. Okay.**
 9 A. It depends on the situation.
 10 **Q. Okay.**
 11 A. And I will say some school administrators
 12 have chosen to take that step. At Arapahoe, Natalie
 13 has chosen to tell every teacher about every threat
 14 assessment even next year, next semester. That's a
 15 building decision that she made, not every building is
 16 making that decision.
 17 **Q. Understood. Did you come to an**
 18 **understanding about why LPS staff was confused about**
 19 **notifying teachers and other staff about threat**
 20 **assessments?**
 21 A. I don't know if necessarily we came to a
 22 conclusion, other than we discussed that that's an
 23 area that we need to continue addressing in training
 24 and in our guidance. I think there was a consensus
 25 that that's a challenging process and that teams are

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1 worried that, you know, any kid who makes an
 2 off-the-cuff threat and may be -- gets evaluated
 3 through this process will be labeled, they also -- as
 4 normal, you have different teachers and different
 5 staff in the building who have different sensitivities
 6 and perceptions of kids, and I think, you know, the
 7 common consensus was that it's a difficult thing, and
 8 we need to continue to try to do our best to define
 9 basically the required, the tight expectation versus
 10 the loose.
 11 **Q. All right. And at the bottom of this**
 12 **slide, there's a reference to the logistic challenges**
 13 **of implementing a tight safety/supervision plan?**
 14 A. Yeah.
 15 **Q. What can you tell me about what those**
 16 **challenges were that were expressed to you?**
 17 A. So those are things like a principal
 18 saying, you know, Everybody in a safety plan says we
 19 need to have eye-to-eye supervision on this kid, and I
 20 don't have the staff to do it. How am I going to do
 21 that without the staffing level to do that or my -- we
 22 want to meet with this kid on a weekly basis with my
 23 psychologist, but their schedule is so booked, it
 24 makes it difficult.
 25 It's those kind of things that an

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1 administrator or principal who wants to do this piece,
 2 says, How are we logistically going to do this in my
 3 building with the resources I have. And, again, as a
 4 district person, it makes it a challenge because then
 5 it makes building administrators get in this pickle
 6 of, you know, Do I implement the safety plan fully and
 7 take staff away from other pieces of what I need to do
 8 in my building, or do I say I can't have this kid in
 9 my building. So that's kind of the nature of the
 10 challenge and discussion we had.

11 **Q. Okay. Well, let me ask this, can you**
 12 **tell me how many psychologists, LCSW's, counselors, or**
 13 **other mental health professionals are employed by the**
 14 **Littleton Public School District?**

15 A. Today?

16 **Q. Yes.**

17 A. I'd say around 75.

18 **Q. Okay.**

19 A. I don't have the hard numbers in front of
 20 me, but I would estimate around 75.

21 **Q. But in that range, right?**

22 A. Yes.

23 **Q. And in looking at the total assessments**
 24 **by year, this is slide 4045, there has never been a**
 25 **year where there were more than 60 threat assessments**

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1 **performed; is that right?**

2 A. Not through this date.

3 **Q. Yes. And, in fact, in all years prior to**
 4 **Claire Davis' death there had never been as many as 20**
 5 **performed throughout the entire district, right?**

6 A. Correct.

7 **Q. So I'm not good at math, but it would**
 8 **seem to me that for every threat assessment that is**
 9 **described on this sheet, that student could be**
 10 **assigned a specific mental health professional who was**
 11 **responsible for following up with that kid, and you**
 12 **would still have people left over who didn't have an**
 13 **assigned kid; isn't that right?**

14 A. Well, I mean, I guess you could do that.
 15 In reality, it doesn't work that way because you hire
 16 someone for a building role and they have other duties
 17 that they're trying to perform but --

18 **Q. And I understand they have other**
 19 **responsibilities. But my point simply is this, you**
 20 **could assign every kid who gets a threat assessment to**
 21 **a dedicated mental health professional whose job it**
 22 **was to follow up with that student, correct?**

23 A. Assuming so, that they have one in their
 24 building, yes.

25 **Q. And even at that, nobody would have to**

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1 **get two students?**

2 A. At this time, yes, that was realistic, I
 3 would say based on the number we had. Again, the
 4 numbers are different now. And, again, it --
 5 depending on what that person's role in the building
 6 was, they may or may not have had certain constraints
 7 on their schedules.

8 **Q. Now, one of the things that was done as**
 9 **part of this administrative review was you all looked**
 10 **at threat assessment documents from a bunch of other**
 11 **school districts, correct?**

12 A. Some, yes.

13 **Q. And I want to direct your attention to**
 14 **page 4076, and I think this is part of a Clark County**
 15 **threat assessment program. And I'm going to ask you**
 16 **if that's what you understand it to be or do you know?**

17 A. You know, without going back and looking
 18 at my original documents, I can't tell you if that is
 19 -- I mean, Clark County has a different font.

20 **Q. Let me ask you, do you recognize the**
 21 **document on page 4076?**

22 A. Yeah.

23 **Q. Can you tell me what it is?**

24 A. It's just a sample of talking points for
 25 a staff meeting about threat assessments.

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1 **Q. And is this a document or a tool that LPS**
 2 **has adopted as part of this administrative review of**
 3 **the threat assessment?**

4 A. No.

5 **Q. Is there a reason that LPS has not**
 6 **adopted these talking points for talking to its staff**
 7 **about the student threat assessment system?**

8 A. Not specifically.
 9 (Deposition Exhibits 47 and 48 were
 10 marked.)

11 **Q. And I think you'll see that Exhibit 47 is**
 12 **the 2011 version of the LPS threat assessment and**
 13 **action plan?**

14 A. Correct.

15 **Q. And 48 is the new and improved 2014**
 16 **version of the LPS threat assessment and action plan;**
 17 **is that right?**

18 A. Yes.

19 **Q. And there are a number of changes that**
 20 **were made in the 2014 version, correct?**

21 A. Yes.

22 **Q. Who made those changes?**

23 A. I made them. I mean, ultimately I
 24 changed the form with my support staff.

25 **Q. And were these changes made as a result**

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1 **of the review that was described in Exhibit 17?**
 2 A. Some of the changes were directly from
 3 that. Some of them were other changes we had planned
 4 to make prior to December of 2013.
 5 **Q. And in looking at some of these changes,**
 6 **one of them is a checklist for what interviews have**
 7 **been conducted --**
 8 A. Yes.
 9 **Q. -- at the bottom of page 1?**
 10 A. Correct.
 11 **Q. Why was that change made?**
 12 A. It was made to give specific prompts for
 13 who they should be considering doing interviews with
 14 and to document that specifically.
 15 **Q. All right. And another change is in the**
 16 **protective factors section?**
 17 A. Uh-huh.
 18 **Q. There's a statement about personal**
 19 **strengths. Why was that added?**
 20 A. We felt it was important to indicate what
 21 are some of the things we can build on in terms of
 22 what a kid has for strengths, and, again, identify
 23 some of those things that are possible resources to
 24 help a kid.
 25 **Q. Okay. And in the protective factors,**

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1 **there's still a discussion, or at least a line to**
 2 **identify the names of the persons who will be**
 3 **monitoring the student of concern, correct?**
 4 A. Yeah. And, again, that relates to the
 5 one above it. It says typical adult supervision, and
 6 that's typically related to parents is how we train
 7 that one. Not solely to parents but, you know, what
 8 kind of adult supervision the student has beyond the
 9 school.
 10 **Q. All right. And then on the next page, on**
 11 **step 5, develop an action plan?**
 12 A. Yes.
 13 **Q. There's a new section about mental health**
 14 **measures, right?**
 15 A. Correct.
 16 **Q. And that includes suicide risk screening,**
 17 **emergency hospital evaluation?**
 18 A. Correct.
 19 **Q. Referral for an urgent mental health**
 20 **appointment and some other things, right?**
 21 A. Correct.
 22 **Q. Why was that section added?**
 23 A. Well, we -- some of these were already
 24 included on the prior form. We just wanted to
 25 organize it, and we wanted people to really prioritize

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1 the mental health measures first. We always train
 2 that if a kid is in a mental health crisis, we need to
 3 address that before we look at discipline or anything
 4 else. So we felt it was important just to use that
 5 header. And then the piece with the suicide
 6 screenings, we wanted that to be front and center,
 7 that these are still linked, suicide and school
 8 violence, or any targeted violence that we want people
 9 to have right up at the top of that action plan that
 10 we need to ask that question in every situation when
 11 we're assessing threat.
 12 **Q. All right. And in the mental health**
 13 **measures of the action plan section of the threat**
 14 **assessment document, there is, as I noted, a section**
 15 **for referral for urgent mental health appointments?**
 16 A. Right.
 17 **Q. At what point do the threat assessment**
 18 **teams make that type of referral for a mental health**
 19 **appointment?**
 20 A. That really depends on the individual
 21 kid's needs, but typically what we're looking at with
 22 that is if a kid doesn't qualify for a rest or a
 23 hospitalization, or, you know, even if they may not be
 24 a medium- or high-level threat, but we're very
 25 concerned about their mental well-being or mental

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1 health, we would recommend that we refer the family to
 2 an urgent mental evaluation. And that would be at a
 3 walk-in center or something more than just waiting a
 4 week for an appointment. And so there are some
 5 situations where a kid doesn't meet the criteria to be
 6 hospitalized based on risk to self or others, but we
 7 do feel like, you know, whether it's just general
 8 mental health decline or depression.
 9 **Q. All right. And does the threat**
 10 **assessment teams -- or do the threat assessment teams**
 11 **that are using this new tool, do they do anything to**
 12 **verify that the student has actually followed through**
 13 **on that referral for an urgent mental health**
 14 **appointment?**
 15 A. Yeah, that's a significant part of our
 16 coaching.
 17 **Q. So how do the teams verify that?**
 18 A. Typically, that's through the parent. If
 19 the parent has already signed a release form, which in
 20 some cases we have them sign that form before they
 21 leave for the appointment, then we can call
 22 proactively to the provider. We have built a pretty
 23 strong relationship with our crisis walk-in center,
 24 which is located in our district that opened last
 25 fall. And so that center has got a great working

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1 relationship with us, and as long as we have a release
 2 form, they will call us back when the student is done
 3 being evaluated, or if we already have the release, we
 4 can call them.
 5 **Q. All right.**
 6 A. So that's usually how it happens.
 7 **Q. Now, in the discipline and monitoring**
 8 **section of the threat assessment template, it doesn't**
 9 **look like there were any significant changes to that**
 10 **section; am I right about that?**
 11 A. No. I mean, we moved one up -- one of
 12 them up under mental health measures, but I don't
 13 think there was any other major changes in there that
 14 I can note. The follow-up intervention was moved up.
 15 **Q. Right.**
 16 A. So it's just kind of trying to organize
 17 the headers a little better and make sure that people
 18 understood those.
 19 **Q. Right. And my question, when it comes to**
 20 **discipline and monitoring, is does a specific person**
 21 **on each threat assessment take ownership of monitoring**
 22 **the student who is the subject of the threat**
 23 **assessment?**
 24 A. It depends on how they establish the
 25 plan. So typically the administrator would continue

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1 to monitor because that's a situation that they
 2 managed. And so they would monitor, you know, is
 3 there any additional problems or discipline, those
 4 pieces. If we set regular weekly meetings with the
 5 psychologist or counselor, then they would have that
 6 piece of monitoring. If we've established a safety
 7 and supervision plan, then there may be multiple
 8 people ensuring that, including teachers and other
 9 staff who are aware of it.
 10 **Q. Well, is there a specific requirement or**
 11 **expectation from your office that somebody involved on**
 12 **any given threat assessment will be primarily**
 13 **responsible for the monitoring and follow-up of that**
 14 **student, whatever shape it may take?**
 15 A. Well, ultimately it's the administrator
 16 as the person who led that process and established
 17 what the follow-up plan is going to be. They
 18 ultimately are responsible for making sure that the
 19 follow-up meeting or the follow-up appointments,
 20 contacts happened. If there's a safety plan, there's
 21 a review date on that that says, Okay, this plan will
 22 be reviewed in December, January, you know, and then
 23 at that point they decide whether it's changed,
 24 continued, or discontinued.
 25 **Q. As I said at the beginning of this**

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1 **deposition, the objective of this process is to figure**
 2 **out what can be done to make schools safer so that**
 3 **this doesn't happen again and to uncover what the**
 4 **lessons are that can be learned from this tragedy. So**
 5 **I'll ask you straight out, what do you think are all**
 6 **lessons that LPS has learned from this?**
 7 A. I think one is that we have to continue
 8 improving as -- as I believe we have been focused on,
 9 but I think that's a lesson with more clarity in terms
 10 of the intensity and the amount of attention we need
 11 to provide on a regular basis to this process and to
 12 our kids with the highest needs. So I'd say that's a
 13 -- that's definitely a lesson we've learned and I feel
 14 like we have paid attention to.
 15 Also, I think a piece of this lesson is
 16 the importance of following up with mental health
 17 intervention. To that end, we've got a new program
 18 that's started now that is 100 percent focused on
 19 connecting kids and families to mental health
 20 services, and we're excited about that becoming part
 21 of what we do in the district.
 22 And so we've been committed to figuring
 23 out what are the ways we can get kids who need help,
 24 help. Even if -- you know, a school district, that's
 25 not typically been their role is to force people to go

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1 get mental health help. So trying to figure out what
 2 our roles as a school district is when we have kids
 3 and families who may not see the level of importance
 4 or risk that we see.
 5 I think another lesson learned is there
 6 are limitations to a site-based management model of
 7 schools, and that when you have that model, there are
 8 limitations to districtwide consistency. And it makes
 9 it difficult to ensure that all schools are following
 10 the exact same procedure.
 11 **Q. Any others?**
 12 A. I think -- I think I will reiterate that
 13 having people -- having people, not just enough people
 14 to do threat assessments, but people to really build
 15 -- have the time to build relationships with kids.
 16 And that as schools -- and being a center point for
 17 the community through the years, as we've been kind of
 18 tasked with doing more and more of this kind of work,
 19 mental health work, and managing dangerous situations
 20 and that we need people.
 21 And I think that challenge is we don't
 22 have enough people to necessarily build the kind of
 23 relationships I feel like I would want us to build so
 24 that we can be more in tune when the kid's starting to
 25 struggle like this and really have some people in the

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1 building who have that strong connection. Just the
 2 size. I grew up in a school -- I graduated with 23
 3 kids. Every teacher knew everything about me. You
 4 can't do that in a school of 2300 kids, and I think
 5 there is something lost there. I think there's
 6 certainly a lot of great things that do happen.
 7 **Q. Well, you mentioned that LPS -- and I'm**
 8 **going to guess that this is what you were getting at.**
 9 **You mentioned that LPS, or maybe it was just Arapahoe,**
 10 **was going to be implementing an advisement program?**
 11 A. Correct.
 12 **Q. Tell me what that advisement program is**
 13 **going to look like and what its purpose is.**
 14 A. I just know the surface level at this
 15 point. I know it's pretty new. I know that the -- my
 16 understanding of the intention of it is to provide an
 17 opportunity to work with kids around some of those
 18 things that are not academic related. Social skills,
 19 resiliency, having a growth mindset. Some of those
 20 non -- kind of noncognitive, nonacademic things that
 21 really help kids be successful. You know, I'm excited
 22 to talk to them about ways that they could use that
 23 advisement period for some of these things.
 24 I certainly would include as part of our
 25 lessons learned that we do need to figure out how to

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1 ensure that our entire community, including students,
 2 knows what those concerning signs are, not just for
 3 risk of school violence, but risk of kids who are in
 4 desperation, kids who are struggling to manage their
 5 life, or getting hurt. And we need to figure out some
 6 more structured ways to get that to everybody, at
 7 least some basic common messages.
 8 **Q. And is this advisement program going to**
 9 **be -- in my world we would call that almost a**
 10 **mentorship program. Is it something like that? Is**
 11 **every kid going to be assigned an adult in the**
 12 **building?**
 13 A. Well, the advisement model, we have it in
 14 some of our other schools. Again, you can customize
 15 it, but it's really that a teacher is assigned to a
 16 group of students and they meet on a regular basis.
 17 It might be once every other week, once a week, once a
 18 month, and they have certain topical things they
 19 discuss, as well as a connecting point. The teacher
 20 gets connected with those students, that's part of
 21 what we're hoping for from that.
 22 **Q. Okay. And as I mentioned, this is --**
 23 **this whole process will result in a report, or**
 24 **multiple reports, that will be presented to a**
 25 **legislative committee that is studying school safety.**

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1 **And as you may have heard, one of the questions that**
 2 **I'm asking at the end of every deposition is, is there**
 3 **anything else that you want to tell that committee**
 4 **about what schools need to make schools safer for our**
 5 **children?**
 6 A. Yeah. I would say one is -- I mean, we
 7 need clarity. I mean, part of the challenge is there
 8 needs to be more clarity from the attorney general's
 9 office from wherever to help us understand really
 10 where those lines cross and blur related to sharing of
 11 information.
 12 You know, can a school district keep a
 13 kid out until they get mental health help. You know,
 14 really give us some additional guidance on, you know,
 15 this is when you can and when you can't, what the --
 16 you know, the -- whether it's a burden of evidence or
 17 whatever it is -- I think schools do need more
 18 guidance in that area.
 19 I think it's very difficult when you
 20 blend in special education law and the protection for
 21 kids with disabilities and blend in, you know, the
 22 constitutional rights. It would be very helpful to
 23 have that. There was an attorney general's kind of
 24 guide to schools, I think the last version was 2009.
 25 I would really like to see an updated version of that

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1 that gives us more guidance on some of these things.
 2 I think another thing is we need options
 3 for kids who are high risk. Part of our challenge is
 4 we have many kids that we feel like are high risk and
 5 there aren't many options. They don't meet the
 6 criteria to be hospitalized. They can't be arrested,
 7 law enforcement says we don't have enough to arrest
 8 them, and we have to educate them as a public school.
 9 And so we get limited in terms of how we can do that,
 10 and the best option that you end up having to maintain
 11 safety is putting a kid on a computer at home or in a
 12 very specific kind of one-on-one tutoring program or
 13 putting them in an alternative school where they're
 14 with other kids who maybe have had some of their own
 15 issues. And that really limits our -- you know, what
 16 we can do, as well as some of those are not really
 17 good options to take a kid who is at-risk and put them
 18 in an isolated setting. It can further that.
 19 So the loss of mental health psychiatric
 20 beds in this state has been significant. In just my
 21 years alone, we've lost three major facilities that
 22 did inpatient psychiatric care. The loss of funding
 23 from Medicaid, from human services to provide day
 24 treatment facility schools is significant. To be
 25 honest, I really think insurance companies have a

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1 higher responsibility than they have right now to
 2 provide resources and intensive interventions for
 3 kids. Those are all things that are a part of this
 4 problem. And, again, that's just when we identify
 5 that a kid is high risk, let alone the ones that we
 6 haven't identified that could be getting there. So
 7 options for kids is a continual problem for us.
 8 I think another piece of this when you
 9 start talking about kids and parents in a community is
 10 how do we balance informing people about this piece
 11 and educating them with not building a culture of fear
 12 that's so significant that we have witch hunts. And
 13 I've been through that on multiple occasions and, you
 14 know, parents that, you know, certainly don't want to
 15 come in and talk about this would share stories about
 16 how their kid has been demonized based on something
 17 that happened or did because of rumors that swelled.
 18 And we have to balance that piece of how do we -- how
 19 do we respect that piece but also ensure safety.
 20 And so somehow if we can have that
 21 conversation with the higher level with experts at the
 22 state and national level to say what is the right
 23 balance, how do we balance sharing the early warning
 24 signs information and the signs of troubled youth
 25 with, you know, not building this culture of fear

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1 which is not good for anybody. So, I mean, those are
 2 probably the big ones. I could probably talk for
 3 hours on that but --
 4 **Q. No. And I appreciate that, but I**
 5 **genuinely -- I asked the question as broadly as I did**
 6 **because this is going straight over to the capitol,**
 7 **and I want them to hear what the people who are in the**
 8 **buildings every day are facing.**
 9 A. Yeah, there's a lot of things along those
 10 lines. Those are probably the most significant, but,
 11 you know, I'll tell you, our school district is 15,000
 12 students. And the scope of what I manage for that is
 13 all the way from discipline to crisis response to
 14 threat assessment, suicide. You know, there are
 15 bigger districts who have more narrow specialists, but
 16 the level of what we're seeing right now in the
 17 schools is -- it's significant and much different than
 18 what has been there in the past. And we do need more
 19 resources.
 20 That's another thing I would tell
 21 legislators is, you know, the school funding has been
 22 cut so significantly that we have to make decisions
 23 around is this a counselor, is it a teacher. Is class
 24 size 37 or 38 or do we add another counselor. And
 25 that has to be a piece of this discussion, it just

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1 does.
 2 And I would say also there is some piece
 3 to having the discussion about standardization, and
 4 I'm pretty familiar and close with most of my metro
 5 colleagues and my role on what we do, and I think
 6 there's some people who, like me, do this and manage
 7 this on a regular basis who know a lot about it and
 8 know a lot about the challenges. And I think it would
 9 be worth while to have those folks continue to sit
 10 down and talk about what do we believe works and how
 11 do we start looking at trying to get more standardized
 12 about that.
 13 **Q. About the threat assessment process?**
 14 A. Yeah, the threat assessment process and
 15 general warning signs, you know, dangerous situations,
 16 but this one is a specific one.
 17 **Q. Okay.**
 18 A. So, like I said, I could probably talk
 19 about this for a long time, but those are the big
 20 ones.
 21 **Q. I appreciate it.**
 22 MR. ROCHE: Let's go off for just a
 23 minute, and I'll be right back.
 24 (Recess taken, 5:11 p.m. to 5:14 p.m.)
 25 MR. ROCHE: Back on the record.

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1 Mr. Thompson, I don't have any additional questions
 2 for you. I do want to say we really appreciate your
 3 coming in and answering my questions and helping with
 4 this process. Okay. I don't think Steve has any
 5 questions but he might.
 6 MR. EVERALL: I don't have anything.
 7 WHEREUPON, the within proceedings were
 8 concluded at the approximate hour of 5:14 p.m. on the
 9 12th day of October, 2015.
 10 * * * * *
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I, NATHAN THOMPSON, 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

NATHAN THOMPSON

The signature above of NATHAN THOMPSON 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. 10/12/15 (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 NATHAN THOMPSON 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 26th 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.

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 NATHAN THOMPSON 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 26th 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.



Ashley D. Mahe
Registered Professional Reporter

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