

1 JAG NO: 2015-0665A

2 \_\_\_\_\_  
3 DEPOSITION OF: VICTORIA D. LOMBARDI - July 2, 2015  
4 \_\_\_\_\_

5 IN RE THE ARBITRATION OF:  
6 MICHAEL and DESIREE DAVIS,  
7 Claimants,  
8 and  
9 LITTLETON PUBLIC SCHOOL DISTRICT,  
10 Respondent.  
11 \_\_\_\_\_

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12 PURSUANT TO NOTICE, the deposition of  
13 VICTORIA D. LOMBARDI was taken on behalf of the  
14 Claimants at 950 17th Street, Suite 2400, Denver,  
15 Colorado 80202, on July 2, 2015, at 2:04 p.m., before  
16 Ashley D. Mahe, Registered Professional Reporter and  
17 Notary Public within Colorado.

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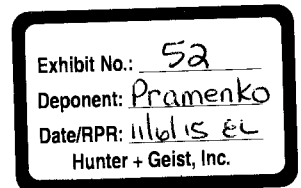
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1 Q. Do you know what I'm referring to?  
 2 A. Yes.  
 3 Q. Tell me what you know about this  
 4 discrepancy about whether you told Mr. Kolasa that you  
 5 and your students were scared that day.  
 6 A. Well, I know he heard me because he said,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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3 **Q. Right.**

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

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

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

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

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

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

12 A. So -- sorry, go ahead.

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

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

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

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

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

3 **fix that after the fact.**

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

5 opportunity.

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

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

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

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

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

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

12 there.

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

14 A. So fifth hour --

15 **Q. The next day?**

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

17 suspended --

18 **Q. Okay.**

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

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

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

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

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

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

25 apologize profusely and said she was sorry.

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1 Well, then the next day, he was being

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

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

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

5 assessment done on him. So this teacher goes to

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

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

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

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

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

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

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

13 the rest of the semester.

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

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

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

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

18 **be much, much better?**

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

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

21 referral right away and explained what happened. And

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

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

24 really awful names. So they interviewed those girls.

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

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1 the interview, the students told me.

2 But I wrote a referral, and when the

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

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

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

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

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

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

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

10 the student, and then my understanding after the

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

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

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

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

15 after --

16 **Q. Why not?**

17 A. Because the administration doesn't know

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

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

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

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

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

23 assessment.

24 **Q. Okay.**

25 A. And if they did a threat assessment and

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

2 involved.

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

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

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

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

7 when we had our training on threat assessments that

8 there would be teachers involved in the threat

9 assessment. I personally in my seven years have never

10 had a threat assessment, never asked for one except

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

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

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

14 at a training and that's it.

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

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

17 **assessments on students?**

18 A. I know one teacher in my world language

19 department that did one this past spring, yes.

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

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

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

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

24 **one?**

25 A. Better communication is huge because --

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

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

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

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

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

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

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

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