

IN THE COURT OF COMMON PLEAS OF
YORK COUNTY, PENNSYLVANIA

STEPHEN BEAVER,) Civil Action - Law
LEAH COOPER, AMY ELLIOTT,) No. 2024-SU-001322
JOHN ELLIOTT, JEFF HARMON,)
TARA HIGH, KATHERINE JAN)
JARRETT, JESSE SAYRE, AND)
JANE VIVIER,)

Plaintiffs)

VS)

BOARD OF SCHOOL DIRECTORS)
OF THE WEST SHORE SCHOOL)
DISTRICT, HEIDI THOMAS,)
KELLY BRENT, DAVID)
BRINTON, BRENDA COX, AND)
MANDY DAVIS,)

Defendants

--oOo--

DEPONENT: Christopher Kambic

TAKEN BY: Plaintiffs

DATE: Wednesday, February 19, 2025

TIME: 2:56 p.m.

PLACE: Ream, Carr, Markey, Woloshin &
Hunter, LLP
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York, Pennsylvania

REPORTER: Angela Kilby
Court Reporter, Notary Public

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20 ALSO PRESENT:

21 Jeff Harmon

22

23

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It is hereby stipulated and agreed by and between counsel for the respective parties that the deposition is being taken for discovery; that reading, signing, sealing, certification, and filing are waived; that all objections, except as to the form of the question, are reserved to the time of trial.

CHRISTOPHER KAMBIC,
called upon by Plaintiffs to give testimony, being
duly sworn or affirmed by me, testified as follows:

EXAMINATION

Q. Welcome, Mr. Kambic. My name is John Elliott, I am representing the plaintiffs in this matter.

A. Christopher John Kambic, 625 Davis Drive, New Cumberland, Pennsylvania.

A. No.

1 Q. I am going to very briefly kind of go
2 over the ground rules. If you have any
3 questions before we get started, please feel
4 free.

5 A. Mr. Elliott, let me just -- one thing
6 they always tell us at board meetings to do,
7 turn off your cell phone. I just don't want
8 somebody -- sorry.

9 Q. That is fine.

10 A. I don't want that ringing in the
11 middle.

12 Sorry about that.

13 Q. Obviously you have just been placed
14 under oath, which means you are subject to the
15 penalties of perjury, just as though we were in
16 court.

17 A. Mm-hmm.

18 Q. Your duty is simply to tell the truth
19 to the best of your recollection. If I ask you
20 a question and you don't know the answer, that
21 is perfectly fine to say I don't know or I don't
22 remember, as long as that is the truth.

23 My duty is to ask you questions that
24 you can hear and understand. If at any time I
25 ask a question that you don't understand, please

1 ask me to rephrase or repeat it, and I'll try to
2 do so. Otherwise, if you answer a question,
3 we'll presume you heard and understood the
4 question.

5 A. Okay.

6 Q. The stenographer is taking down a
7 written transcript of everything we say here in
8 the deposition, which means you need to give
9 verbal answers because it is difficult for a
10 transcript to accurately convey gestures or nods
11 of the head, shakes of the head, that kind of
12 thing.

13 A. Okay.

14 Q. Do you understand that?

15 A. I understand that.

16 Q. If at any time you need to take a
17 break, speak to Attorney Bonn, that is fine.
18 Just let us know, we can take a break.

19 Do you have any questions before we
20 get started?

21 A. No. I think my hearing aids are
22 turned up, I can hear you.

23 Q. What is your educational background?

24 A. Educational background. I have a
25 bachelor of science degree in education from

1 Millersville University, plus I believe about 33
2 credits post graduate then.

3 Q. Okay.

4 A. It would be a master's equivalency,
5 but I never put the paperwork in.

6 Q. When did you get your degree?

7 A. My degree was in 1985.

8 Q. Since then what is your employment
9 history?

10 A. Employment history, I worked for three
11 years at James Buchanan High School in
12 Mercersburg, Pennsylvania. And I was hired in
13 West Shore School District, I spent 11 years at
14 Red Land High School and 22 years at Cedar Cliff
15 High School. I retired in 2021.

16 Q. Were you a teacher?

17 A. I was a teacher, I was department
18 head, tech ed teacher there. Coaching two
19 sports. What else? Anything else you need?

20 Q. No, just -- that's good.

21 What -- when were you elected to the
22 school board?

23 A. I was elected in the fall of 2021
24 after I retired.

25 Q. Prior to that, had you had any

1 experience serving on any municipal or
2 government boards or agencies?

3 A. No. Nothing municipal or government,
4 no. Just local things, like, you know,
5 football, local football board, stuff like that.

6 Q. Have you had any training relating to
7 the Sunshine Act and/or right-to-know law?

8 A. Yes. Initially it was through PSBA.
9 When first elected, we had required training to
10 go to. Then every year Stock and Leader would
11 have kind of a dinner and they would talk about
12 current issues in education law, and they always
13 would bring up, to my recollection, always would
14 bring up Sunshine law.

15 That was up until the time they were
16 no longer solicitor, which was April 2024. So,
17 I don't remember the last one, if we went in the
18 winter or if it was in the fall. I don't
19 remember exactly when.

20 Q. Okay. Did you have any involvement --
21 let me back-up.

22 Around January there was a committee
23 formed to look into the possibility of a request
24 for proposal for legal services, correct?

25 A. Yes.

1 Q. Did you have any involvement with that
2 committee?

3 A. No. I gave way to the people who had
4 much more experience than I.

5 Q. Okay. So, you came on in around 2021.
6 So, you were not around the last time the board
7 did an RFP?

8 A. No, no.

9 Q. What is your understanding of the
10 purpose behind doing an RFP --

11 A. Well --

12 Q. -- for legal services?

13 A. For legal services. My understanding
14 is you are going out there and trying to find,
15 one, the best value for your money. No. 2, who
16 are the most -- most experienced law firms,
17 especially in the area of special education. I
18 taught for many years. In my area, being a
19 technology education teacher, which you would
20 call shop class, I had a lot of kids who were
21 what we would call mainstreamed, kids who had
22 special needs. So, I have been through a lot of
23 IEP meetings and I know there are parents who
24 are litigious about their special -- make sure
25 we are following that special ed program, that

1 IEP. So, I know having a solicitor who that is
2 one of their big areas of expertise is very
3 important.

4 So, your value of your money, how good
5 or experienced are they in special education
6 law, do they have separate lawyers, you know,
7 who are specialized in that is very good, what
8 is their experience in education law. That is
9 very important.

10 So, right now I am going through an
11 RFP for transportation. It is literally 52
12 pages, or something like that, and that was for
13 transportation. I have never seen one for -- a
14 completed one for a law firm. But I imagine
15 there is a lot of stipulations in there to make
16 sure you are getting exactly what you want.

17 My consideration of an RFP is, you
18 know, we are basically laymen coming in, and the
19 people who have to work with them are
20 administrators and they know better, you know,
21 what they are looking for. I know basically
22 what I am looking for, but I depend on their
23 experience, what -- what are they looking for
24 specifically. They know the better questions.

25 One of the things I got to do my first

1 two years was sit on interviews for principals.
2 And the questions -- I mean, I know what I want
3 in a principal, but the questions that the
4 administration was asking was something I never
5 -- some things I would never think of. So, I
6 value their experience with that.

7 Same with we were hiring security
8 guards. I wouldn't know what questions to ask,
9 but they did.

10 Is there a tissue around here? My
11 nose is -- I am dealing with -- I'm sorry. I
12 got a little three-year-old granddaughter.

13 (Discussion off the record.)

14 THE WITNESS: The question was, what
15 is my understanding of what RFP is?

16 BY MR. ELLIOTT:

17 Q. Yes.

18 A. I believe -- I think I answered what
19 my understanding was.

20 Q. To the extent the board was going to
21 look to hire a new solicitor, do you agree that
22 is the process that should be followed to find
23 one?

24 A. We should follow an RFP and have the
25 administration interview them. You mean like

1 that?

2 Q. Yes.

3 A. Yes, I believe that is definitely.

4 Q. And I think you certainly implied
5 this. Do you believe that the administration
6 and/or school employees who would be working
7 directly with the solicitor should have input
8 into that process?

9 A. Yes. I mean, not to go off on
10 tangents, but I believe when I was department
11 head that I should be involved in interviewing
12 the teachers who are coming in my department,
13 because I have an expertise that maybe the
14 principal doesn't.

15 So, yeah, I believe all the
16 stakeholders should be involved.

17 Q. When did you first find out that the
18 RFP or the committee for forming the RFP was no
19 longer functioning?

20 A. That was the phone call I received
21 from Heidi Thomas.

22 Q. Okay.

23 A. The exact date is in here. I can give
24 you from my phone record when the exact date
25 was.

1 Q. Yeah. I think you may have --

2 A. If you want me to pull that out.

3 Q. Was that -- yeah, I think you said in
4 the written discovery responses that on April 5
5 Mr. Kambic received a telephone call from Heidi
6 Thomas.

7 A. If that is what my phone record says
8 there, I would be -- that would be the first
9 time I had heard. I had no questions on that.

10 Q. As long as we are on that call, what
11 did Ms. Thomas tell you during that call?

12 A. To the best of my recollection, what
13 the conversation was, she said, Chris, I just
14 want to call you and give you a heads up, we are
15 going to be moving forward in hiring a solicitor
16 next Thursday. And I said, well, who
17 interviewed him? Who made the pick? Because my
18 consideration, we were still going through the
19 committee process, and I believe we were very
20 close to issuing the RFP. And she said, well,
21 we picked something.

22 So, I remember she said the word we.
23 And I was, like, well, did the administration
24 interview him? And she -- I am trying to
25 remember from back then. She didn't say the

1 administration interviewed him at all. This is
2 the person we are going to choose.

3 Q. Okay. Did they tell you who that was?

4 A. She said, yes.

5 Q. Did they tell you it was Kevin Hall?

6 A. I believe she did say it was Kevin
7 Hall. But, again, with my memory of names and
8 stuff, and the fact I was pretty shocked at the
9 time, I called -- after that I called Brian
10 Guistwhite and said, what happened? Because he
11 was in the RFP process. He didn't know what was
12 going on.

13 Q. Okay.

14 A. So, that is my phone records. You can
15 see I did call him to ask him what was up,
16 because I had no idea. Because, again, I was
17 not intimate in that process. Ms. Tierney and
18 Mr. Guistwhite and Mr. Brinton and Ms. Brent
19 were the ones who were on that committee. I
20 know they were talking about it, they were
21 getting progress and moving along and some
22 things were added. And from what I gather, it
23 was happening, things were moving along. So,
24 this was kind of a shock to me that I was told,
25 hey, we picked somebody.

1 Q. So, you indicated prior to that call,
2 you had had some discussion with either Brian or
3 others on that RFP committee about what they
4 were doing?

5 A. When we were in executive session back
6 there, just gathering the conversation that was
7 going on. I didn't seek him out and ask how
8 things were going. But through the
9 conversations in executive session, when people
10 are talking, hey, we meeting to do this, it
11 sounded to me like things are moving along.

12 Q. Okay.

13 A. No one gave me minutes or anything
14 like that.

15 Q. Did you happen to have a chance to
16 read the transcript of Brian Guistwhite's
17 deposition?

18 A. No. I have not been privy to any
19 deposition.

20 Q. I'll just tell you that he indicated
21 he thought the RFP process was on -- basically
22 on schedule from what was originally
23 contemplated.

24 A. Yeah.

25 Q. Was that your understanding?

1 A. That was my understanding, yes. My
2 understanding that we were ready, very ready, to
3 issue it, like, in the next meeting, I thought
4 coming up, basically we were going to talk about
5 issuing the RFP.

6 I know I have a copy of the original
7 one that was given to us in January. I remember
8 looking at that saying, I don't know a lot about
9 RFPs, but there is a lot of stuff missing in
10 here. I knew it had to be fine tuned and beefed
11 up a bit.

12 Q. Okay. And at any point subsequent to
13 that call, did you find out why the RFP process
14 was being abandoned?

15 A. Well, I can only guess thinking about
16 it was during executive session when they were
17 talking -- can I talk about executive session?

18 Q. I think if it is not attorney-client
19 privilege.

20 MR. BONN: But everything in executive
21 session is confidential.

22 BY MR. ELLIOTT:

23 Q. All right.

24 A. I was under the impression it was
25 moving along.

1 Q. All right. Other than something that
2 occurred in executive session, did you have a
3 discussion with anyone about why the RFP process
4 was abandoned or why they weren't moving forward
5 with it?

6 A. Umm, I am trying to think if
7 afterwards we had discussion about what
8 happened. I don't recall right now exactly what
9 -- I know what was said in the meeting. Again,
10 I don't want to go through executive session.

11 But from what I have heard and what I
12 have seen on the news, you know, I know Ms.
13 Brent felt like it wasn't going the way she
14 wanted it to go.

15 Q. As of the evening of April 11, 2024
16 when the vote on the solicitor occurred, at that
17 point do you believe you knew what the reason
18 was the RFP was discarded?

19 A. I got to watch the video just as a
20 reminder. And one of the comments I made was
21 what is the rush? What is going on? Why are we
22 doing this? From what I saw myself on the
23 video.

24 So, April 11, probably at that point I
25 don't think I knew totally why. I said I had a

1 conversation when I called Brian, like, did you
2 know about this? And he said, no, I thought we
3 were moving along fine.

4 At that point on April 11 I don't
5 believe I knew all the answers, because you see
6 some people called a big -- when I say
7 something, we are talking the four of us for 30
8 minutes and no one else is saying anything, as
9 Monty Python would say, that is not an argument,
10 not a debate, that is me talking, talking,
11 talking, and getting no answers.

12 I was asking questions, and Mrs.
13 Tierney and Mr. Trone and Mr. Guistwhite were
14 asking questions. I was not getting an answer
15 about why. The only thing I got was because
16 basically we wanted to. And that is all I got
17 was really an answer.

18 Q. That was going to be my next question.

19 A. Trying to separate from April 11 to
20 what I have learned subsequently is kind of -- I
21 don't want to nail myself down specifically.

22 Q. Understood. You mentioned during that
23 meeting on April 11 you asked a number of
24 questions?

25 A. Mm-hmm.

1 Q. Do you feel like you got an answer to
2 any of those questions during the meeting?

3 A. I think my quote in the paper was deer
4 in the headlights. I said that is the reaction
5 I was getting. I was not getting any answers.
6 I was not being -- I was not getting any of my
7 questions, nor anyone else's answers --
8 questions answered to anything close to, you
9 know, convince me why.

10 And knowing the background and
11 everything, it is, like, why did we pick this --
12 why did you settle on this person? And I still
13 didn't get an answer. To this day, I have not
14 gotten an answer.

15 Q. And I -- prior to that meeting, had
16 you -- did you get a chance to speak to Attorney
17 Hall at all?

18 A. No. I never met him before.

19 Q. Did you -- other than hearing his
20 name, what, if anything, did you know about him?

21 A. The most information I had was from an
22 e-mail I got from Thad Eisenhower who told me
23 that he was on the library board. I was on
24 that, but I think I found out subsequently he
25 was from New Cumberland. That is what it was.

1 He was a New Cumberland guy.

2 And reaching back into my memory, I
3 am, like, okay, his name does sound familiar. I
4 think he was on borough council at some point,
5 but I never had any interactions with him.

6 Q. All right. As long as we are here and
7 you mentioned that, in front of you there should
8 be a document labeled as Exhibit Brent 10.

9 A. Brent 10, okay.

10 MR. BONN: They are not in order.

11 MR. ELLIOTT: They are not necessarily
12 in order.

13 THE WITNESS: Brent 10. Here it is.

14 BY MR. ELLIOTT:

15 Q. Okay. Please take a moment to review
16 this. I'll indicate this appears to be an
17 e-mail exchange between you and Thaddeus
18 Eisenhower.

19 A. Okay. I have known Thaddeus since he
20 was in high school. So, we have known each
21 other for a long time.

22 Q. So, is this the contact that you were
23 just talking about?

24 A. Yes.

25 Q. Okay.

1 A. Solicitor, wanted new solicitor,
2 proposed is a resident of New Cumberland.
3 Upstanding individual. He may have limited
4 experience in education law, but he can do the
5 job.

6 Yeah, this is where I got, like, okay,
7 he is from New Cumberland. That kind of rang a
8 bell, like, okay, I think he was on borough
9 council. I know he is on library board. That's
10 the -- as much information as I got. I did not
11 receive a single bit of information other than
12 me looking him up when I was given his name to
13 do my own search to see who he was.

14 Q. Okay. And it looks like the initial
15 e-mail from Mr. Eisenhower to you is dated
16 Monday, April 8?

17 A. April 8, which was --

18 Q. Three days?

19 A. -- three or four days before we had an
20 election.

21 Q. Do you know how he was aware that
22 Kevin Hall was being -- his name was being put
23 forth as the solicitor?

24 A. I know through talking with him and
25 seeing what he has done as far as elections, he

1 knows Dave Brinton and he knows Kelly Brent. He
2 did a video for her for her campaign. So, I
3 figured they know each other. You know, it is a
4 friendship or something or through Republican
5 circles. You know, I don't know. I don't know
6 for sure how they know each other. But that is
7 how I believe he would know them.

8 Q. Other than this e-mail, did you have
9 any -- like, a conversation or any other contact
10 with him prior to the 11th?

11 A. Prior to -- on this matter?

12 Q. Yeah. On that matter.

13 A. On this matter, no. I have had prior
14 conversation with him about, like, the ball
15 field up at Cedar Cliff, and when we were
16 working with -- on finishing up Hillside Park,
17 you know, because he was mayor at the time and
18 Newcomer resident. We would talk about that.

19 But about this, no. This was the
20 first time I ever talked to him about this.

21 Q. Okay. So, what -- you said between
22 this and your own search, do you feel like you
23 had sufficient time to be able to evaluate
24 Attorney Hall's qualifications before the vote?

25 A. No. I would like to have interviewed

1 or talked to him personally, you know.

2 Q. What were you able to find out about
3 -- if anything -- about his prior experience as
4 a solicitor?

5 A. I just found out what his
6 specialization in law was when I looked up his
7 name and I got what Tucker Arensberg is the law
8 firm and the law firm was out in Pittsburgh and
9 he is out here and what his area of expertise in
10 law was. And that is pretty much it usual stuff
11 you see in the biography or something, borough
12 council, library board. That is about it.

13 Q. What is your understanding of what his
14 legal area of expertise was?

15 A. I believe it is real estate. It seems
16 to be in my mind. If I am wrong, I'm sorry.
17 But that seems to be that stuck in my head at
18 the point.

19 Q. Do you recall if you found any
20 indication that he had prior experience serving
21 either as a school board solicitor or had
22 educational experience?

23 A. No. And that was one of the things we
24 were talking about with an RFP, making sure
25 somebody had an educational experience, or had

1 been a solicitor, because we are a big school
2 district, you know.

3 Q. You said -- I believe you said that
4 the area of special education was of special
5 importance to you to make sure the solicitor had
6 that knowledge?

7 A. Mm-hmm.

8 Q. Have you been able to determine
9 whether either Kevin Hall or Tucker Arensberg
10 has that same level of expertise that Stock and
11 Leader did?

12 A. I really didn't compare that much. I
13 know Stock and Leader had a lot of attorneys who
14 were close by. And I know that our talking with
15 administration, our incidences of litigation
16 with special education as being the key has gone
17 way down when we had Stock and Leader.

18 Whether Tucker Arensberg had somebody,
19 I am trying to think if they had an attorney
20 with that. I don't remember all the different
21 people who were in the firm, but they were out
22 in Pittsburgh, as opposed to one that was here.

23 And that was one of my concerns, too,
24 are we paying for mileage for people to come out
25 here, or telephone time to take care of stuff,

1 also. I am not sure how you all bill. I know
2 it is increments of, you know, point one or
3 whatever like that. So, I am not --

4 Q. Six-minute increments typically.

5 A. Okay.

6 Q. So, in your role as a school board
7 director, have you been able to review the
8 invoices you get to make any sort of comparison
9 or do you have enough information at this point
10 in to do any such --

11 A. Yeah, I am curious. I know I did see
12 results of a right-to-know, I was comparing a
13 little bit. It is kind of tough to say right
14 now. I would have to do a deep dive study, what
15 is the situation right now.

16 We have been inundated with right-to-
17 know requests, too. I know that costs money.
18 Were we getting these before I was on the board?
19 You know, that is -- that costs money. That is
20 billing by the lawyers.

21 You know, can I compare? I haven't
22 had a chance to sit down and dig up the old
23 bills, the old board notes and stuff and see
24 what -- again, it is what you list is what you
25 are being billed, too, how deep of a dive are

1 you doing there?

2 Q. Next I would like to talk about what's
3 marked as Brent No. 5 in the pile in front of
4 you.

5 A. Okay.

6 Q. This would be -- I'll represent this
7 is an e-mail exchange between Attorney Hall and
8 Attorney Say from April 5.

9 A. Yeah, I have seen this before.

10 Q. That was my next question. Have you
11 seen these e-mails before?

12 A. Yes, I saw this before. I remember I
13 think before -- it was before April 11 we got
14 this. Around that time I saw this letter. And
15 what particular -- if that was something that
16 was shared or whatever I don't recall for sure.
17 But I did see this letter.

18 Q. You think you saw this before the
19 meeting on the 11th?

20 A. I believe I did. I believe I did.

21 Q. All right. Based on this, what is
22 your take on why Kevin Hall was contacting
23 Brooke Say?

24 A. To tell her he was going to be the new
25 solicitor. I mean, why else would he tell

1 somebody don't bother showing up, you know.
2 Asked me to reach out to inform you a change in
3 solicitor will be on the agenda. Well, why
4 would you ask him if he is not the person who is
5 going to be the new solicitor? You are not
6 doing this as a favor.

7 Q. All right. On the second page,
8 looking first at Kevin Hall's e-mail to Say, I
9 think you just kind of read or rephrased the
10 first sentence. It talks about with the goal of
11 making the transition as smooth as possible, we
12 would appreciate it if you could provide us with
13 a list of the most pressing issues facing the
14 school district and begin preparing transition
15 paperwork for any active matters.

16 A. Mm-hmm.

17 Q. Do you have any explanation why Mr.
18 Hall would be authorized to request beginning a
19 transition prior to April 11 if he didn't -- if
20 he didn't know that he was going to be
21 appointed?

22 A. Yeah, my only expectation is that what
23 I am reading, this he was going to be the next
24 solicitor. Because he is saying with the goal
25 of a smooth transition, he would appreciate if

1 she could provide us. So, you are not asking
2 for a third party -- not asking as a
3 clearinghouse as far as I can see. You are
4 asking to go to you, because you are going to be
5 the next solicitor.

6 Q. On the first page in Attorney Say's
7 e-mail response, she indicates, this confirms
8 our conversation where you informed me that you
9 and your firm would be appointed at the upcoming
10 board meeting on April 11. You informed me that
11 President Thomas asked you to make this
12 communication about the appointment and that my
13 presence at the meeting was not necessary.

14 Do you have any basis to dispute the
15 accuracy of what Attorney Say has said about the
16 contents of their conversation?

17 A. My interaction with Ms. Say has always
18 been -- she has always been honest and
19 forthright with me. And when she says this
20 confirms our conversation, you informed me your
21 firm would be appointed, I take her for her
22 word.

23 Q. And you take that to be not just this
24 is a courtesy that this is an agenda item, but
25 this is going to happen?

1 A. Mm-hmm.

2 Q. Is that a yes?

3 A. That is yes. I'm sorry. I should
4 know enough from Judge Judy that you can't nod.

5 Q. Do you know of any reason why Attorney
6 Say would be told not to come to the meeting if
7 it wasn't certain that she was going to be
8 replaced?

9 A. I don't know why, unless she is being
10 replaced why not to show up for that meeting,
11 because it is her job to be at all of our board
12 meetings until such time she is no longer
13 solicitor.

14 Q. Next I would like to talk about what's
15 marked as Brent 7. It is the minutes from the
16 April 11 meeting.

17 A. Okay.

18 Q. Starting on Page 331 and going
19 through --

20 A. 331, that is the first page.

21 Q. That is the first page. Down at the
22 bottom there is a marking, WSSD 000. From 331
23 to 3 -- I believe it is 42, it identifies
24 alphabetically written communications that came
25 in prior to the meeting and says those comments

1 were shared with the board in advance of the
2 meeting.

3 Were those comments that are listed in
4 the minutes all forwarded to you?

5 A. Not all these were -- yeah, okay. I
6 see what you are saying. Were shared -- yeah,
7 all these were shared with me ahead of time.

8 Q. Okay. Had you got a chance to read
9 those prior to the meeting?

10 A. Yeah, I had an opportunity to read
11 through them.

12 Q. All right. Is it fair to say that the
13 majority of those comments were expressing
14 concern with the manner in which the solicitor
15 was being replaced?

16 A. Yes.

17 Q. All right. Some of them suggested
18 that the way it was going about was a violation
19 of the Sunshine Act.

20 Do you recall people making that --
21 extending that opinion?

22 A. Some people saying -- I am looking
23 here, Sheri Moyer right now saying that. She
24 was a board member for several years. I just
25 happened to look at that when you said that.

1 Q. Did you share any of those concerns
2 that there might be a problem with the way the
3 board was moving forward?

4 A. Before the meeting or during the
5 meeting?

6 Q. Before the meeting or during the
7 meeting?

8 A. I believe during the meeting I did say
9 something about Sunshine. You know, that this
10 didn't sound right to me, that you did not
11 include the other four people in any kind of
12 discussion.

13 But I knew -- my dad was on the school
14 board for eight years, my brother was on the
15 school board 16 years. I know you don't discuss
16 things, you know. You can talk about things,
17 but you don't -- how are you going to vote.

18 And I am sitting here looking at we
19 are having discussion and no one else is
20 participating, giving me reasons about why we
21 should hire this person. That would, to me,
22 raise a red flag in my mind. I am, like, I
23 believe sometime during the thing I said
24 Sunshine outside because I am, like, you are
25 stonewalling us. And apparently you made a

1 decision.

2 I wrote down here where they said --
3 first -- I think Mr. Trone asked when was the
4 first time you talked to Mr. Hall, he said
5 Friday right before the meeting, or Friday two
6 weeks ago. Apparently you were afforded an
7 ability to talk to him and I found out, you
8 know, going to lunch. That was it.

9 And it wasn't my place to call up
10 somebody who is a prospective hire and question
11 them. That is not my place, not in that forum
12 on the phone. If I am going to question
13 somebody, it is going to be everybody else here.

14 Q. Okay.

15 A. So, did I express it out loud, I
16 expressed it out loud at the meeting, and I
17 might have expressed it other times, too. I
18 just can't recall exact moments.

19 Q. Do you have an opinion of whether the
20 five board members who ended up voting in favor
21 of Kevin Hall, whether they made a decision to
22 do so prior to the 11th?

23 A. My opinion?

24 Q. Yes.

25 A. Yes. Watching the WHTM interview

1 where Kelly Brent said we call an individual,
2 that is not violating Sunshine law. And to me,
3 I took that, you called everybody individually?
4 That is what I took it as. And that was on
5 April 18 or something where she was interviewed.

6 I am sitting there, I am not hearing
7 any debate, any reasoning, any -- you know, I
8 have been through hiring coaches and everything
9 and administrators, and we have talked about it.
10 And I have been on sit-in interviews talking
11 about strengths and everything and experience.
12 That was for football coaches. I haven't heard
13 any -- I didn't hear anything coming in this
14 person has this experience or even what --
15 printing up for me what is his experience, what
16 would be his -- what word am I looking for?
17 Your resume. Not even that. I didn't know him
18 from Adam.

19 So, the fact they seemed to know so
20 much and I knew nothing, Mrs. Tierney, Mr.
21 Guistwhite, Mr. Trone, I figured, okay, you guys
22 had a conversation about this.

23 Q. Based on that, do you believe that
24 constituted a violation of the Sunshine Act?

25 A. Mm-hmm. I believe so.

1 Q. Do you believe it was intentional?

2 A. Intent would be tough for me to prove,
3 you know. They talked amongst themselves and
4 didn't include us in the conversation, I think
5 that is an intent to not reach out and talk to
6 any of us at all.

7 I never thought I had, you know, any
8 animosity towards them or anything like that,
9 animosity towards people. I just -- the fact
10 that you didn't include any of us, maybe that
11 shows some intent that you didn't -- you wanted
12 to keep it -- you wanted to keep the discussion
13 quiet, but then you told me, hey, this is coming
14 down the pike, we are electing him on Thursday.
15 So, you know, that is the only heads-up I got
16 beforehand.

17 Q. Do you know why you were excluded from
18 that process?

19 A. Not being seen as the majority, even
20 though I am a registered Republican, just like
21 all of them. So, why I am excluded from that
22 group, I don't know. They all ran with the same
23 PAC, and I was not a big fan of that PAC. When
24 I ran, I did not associate myself with anybody.
25 They chose to. And, so, maybe I was persona non

1 grata because I didn't campaign for them.

2 Q. When you use the word PAC, are you
3 referring that as a political action committee?

4 A. Political action committee, the
5 economic -- the economic PAC.

6 Q. PA Economic Growth PAC?

7 A. Growth PAC, yeah. I worked the polls,
8 saw their paperwork all sitting there. And
9 talking to people, you know, so, and their
10 people and talking to against what I was saying.
11 So, maybe I was considered not being a loyal
12 Republican to them.

13 Q. Another e-mail I want to turn your
14 attention to, No. Brent 6. It is an e-mail
15 chain. The first one is dated April 3 from
16 Kevin Hall to Heidi Thomas.

17 A. All right.

18 Q. Then there is a couple pages there --

19 A. April 5 he wrote -- okay.

20 Q. After you have a moment to look
21 through it, let me know if you have seen these
22 before.

23 A. Oh, I have never seen this here, this
24 engagement letter or anything like that.

25 Q. Okay.

1 A. There are not attachments. Please
2 distribute entire e-mail -- last night -- I
3 still don't see any attachments here. Please
4 distribute the entire e-mail that we discussed
5 last night to each, board meeting Friday the
6 fifth. We didn't have a board meeting on the
7 fourth, so I don't know what she is talking
8 about.

9 Oh, as we discussed last night, she
10 discussed with Todd. I don't recall receiving
11 information sheet or information about that. I
12 would have to look in my records on that. I'm
13 sorry, I just don't remember.

14 Q. This claims that there was an
15 attachment that was supposed to be forwarded to
16 the board members.

17 A. Yeah.

18 Q. Do you remember receiving an e-mail
19 with four attachments similar to what's being
20 described here prior to the meeting on the 11th?

21 A. I would actually have to search my
22 e-mails, and I don't recall.

23 Q. Okay.

24 A. Engagement letter -- I mean, this
25 would have been -- this was Friday the fifth?

1 Q. That is the day of the e-mail, yeah.

2 A. Yeah. And -- I would have to look
3 back on my e-mails.

4 Q. Okay.

5 A. I'm sorry, I don't remember.

6 Q. You don't specifically remember one
7 way or the other?

8 A. I don't specifically remember all
9 this.

10 Q. Okay. On the first page, this looks
11 like it is an e-mail from Kevin Hall to Heidi
12 Thomas on April 3.

13 A. Mm-hmm.

14 Q. It says good afternoon, Heidi. Please
15 see the attached business agenda items for the
16 upcoming April meeting.

17 Do you have an explanation why Kevin
18 Hall would be working on agenda items for the
19 meeting before the 11th if he hadn't been asked
20 to do that, didn't know he would be the
21 attorney?

22 A. Yeah, I mean, no. The only thing I
23 imagine is, see attached business agenda items.
24 Business agenda items are -- what are the
25 attached agenda items? I mean, is he talking

1 about for what to do when it comes to time for
2 changing of solicitors? Or is it the entire
3 business agenda? That is one of two different
4 things. So, you know, is he giving a suggestion
5 at that point?

6 Q. Well, I guess --

7 A. On the face I assume that he thinks
8 that, you know, I am the new solicitor. But I
9 have to play my devil's advocate and look at it,
10 please attach business agenda items for
11 upcoming. Without seeing the attached agenda or
12 attached what he wrote, it is hard to say,
13 because this has nothing to do with that. This
14 is business agenda items for the 11th.

15 Again, if I got my phone out and
16 looked on my e-mail under Hall, would that come
17 up?

18 Q. I don't know. Maybe we'll do that in
19 a little bit.

20 But for right now, it looks like on
21 the -- according to the minutes, the agenda
22 items include suspension of Board Policy 005,
23 which had to do with appointment of solicitors.
24 And then that was followed by the motion to
25 appoint Attorney Hall.

1 Do you recall those being sort of
2 the --

3 A. On agenda, yeah.

4 Q. -- the agenda items that were added?

5 A. I know suspension of 005 was change
6 the date that we do the solicitor. Nothing
7 about the process. It was about when we usually
8 appointed a solicitor, which was in May.

9 There was nothing in there about the
10 process of hiring one. I think Mr. Guistwhite
11 said in the meeting, there is nothing written
12 down in concrete how you go about doing it.
13 This is the way we have done it before.

14 Q. All right. Next I would like to bring
15 your attention to what was marked as Brent 11.
16 It is a one-page document. This is an excerpt
17 from the district's answer and new matter in
18 response to the Sunshine Act complaint.

19 A. Okay.

20 Q. And I want to draw your attention
21 specifically to No. 54, which is an allegation
22 being made on behalf of the defendants. It
23 says, upon information and belief Plaintiffs
24 Stephen Beaver, Leah Cooper, Amy Elliott, John
25 Elliott, Jeff Harmon, Tara High, Katherine Jan

1 Jarrett, Jesse Sayre, and Jane Vivier have
2 brought this lawsuit for the illegitimate means
3 of imposing their political agenda on the West
4 Shore School District, regardless of how the
5 majority of the duly elected board members
6 voted.

7 Do you agree with that statement?

8 A. No.

9 Q. Okay. Has any -- has anyone provided
10 you with any evidence that the plaintiffs are
11 bringing this lawsuit for any illegitimate
12 purpose?

13 A. No.

14 Q. And think based on your answers
15 earlier, do you agree that an outside person
16 could have a reasonable belief that the Sunshine
17 Act was violated based upon the documents we
18 have gone over and what occurred at the April 11
19 meeting?

20 A. Yeah. I believe a reasonable person
21 would believe that looking -- watching the
22 reaction and the nonaction of board members, I
23 would -- if you've ever been to a board meeting,
24 much more discussion than that usually takes
25 place when we do any voting or hiring something.

1 So, I think somebody on the outside
2 could reasonably infer that.

3 Q. Based on the training you have had and
4 your understanding of the Sunshine Act, what, if
5 any, distinction would you draw between
6 discussions versus deliberation occurring?

7 A. Well, in my training for Sunshine Act,
8 deliberation involves about how you want to
9 vote. Discussion can be just -- discussions and
10 deliberations. You discuss things. One on one,
11 without meeting of the minds, can you discuss
12 something, like, what do you think, do you think
13 we are going to hire a new coach or something.

14 That is a discussion. I think we
15 should hire Mr. So-and-so, and these are the
16 reasons why. Let me talk to you about this and
17 get your point of view on this. That is
18 deliberation. We are going back and forth and
19 weighing the pros and cons of something, as
20 opposed to having a discussion about, hey, up at
21 Cedar Cliff, West Shore Stadium is way too open,
22 there is people crawling over the fence and
23 using our facilities. That is a discussion.

24 I think we should hire Mr. X, who is a
25 person I know who has got security cameras, you

1 know, that would be improper discussion. We
2 were warned about that, you know, people walking
3 up to you saying, hey, I have a business, I
4 would like to get in there, could you steer me.
5 No, I can't do that.

6 But deliberation would be weighing
7 pros and cons of a person -- of either a person
8 or a program or something.

9 Q. Do you believe any of the board
10 members who voted in favor of Kevin Hall at the
11 April 11 meeting engaged in any deliberation
12 during the meeting to explain their reasons for
13 voting the way they did?

14 A. No. I never heard a particular
15 reason, other than he called me. That is not a
16 reason. That is not being part of deliberation.

17 Mr. Brinton said he Googled him and he
18 called him on Friday. That is when he first
19 talked to him, was Friday the fifth. That is
20 not deliberation. Didn't tell people why. What
21 was it about his background that you found
22 interesting?

23 That is one of the things I said, you
24 know, in my question. I asked, what is it about
25 his background that made him stand out to you?

1 I got no answer. So, to me, that shuts down
2 deliberation.

3 And Ms. Thomas, I believe she said
4 barely much of anything, pros or cons about, you
5 know, Mr. Hall and his qualifications. Just
6 that we wanted to do it, basically.

7 And, again, I don't have a problem
8 with people. You want to change, that is fine.
9 But let's go through the process and be open
10 about it.

11 Q. And did you -- do you recall any
12 deliberation about deciding not to go forward
13 with a formal RFP for legal services?

14 A. No, no. And that is not part of
15 Policy 005, either. I heard someone say we
16 voted to suspend the RFP. We never voted to
17 suspend the RFP. That is not Policy 005.

18 I was on the policy committee for two
19 years. I know what is in there. And nowhere
20 did I hear we are going away from it and our
21 decision to go out on our own and have one
22 person pick a solicitor. I never heard that.

23 Q. At any time after the 11th, did any of
24 the board members who were in favor of Attorney
25 Hall tell you what -- or at any time whether, it

1 is before or after the meeting, did any board
2 member ever tell you why they were dissatisfied
3 with either Brooke Say or Stock and Leader?

4 A. The only thing I ever heard was from
5 Mrs. Brent saying she didn't feel like she
6 represented their interests, to encapsulate
7 that. That is not a direct quote. I heard her
8 say that.

9 I am trying to remember exactly when,
10 it might have been back in January she said
11 that. I definitely did hear that from her, that
12 she didn't feel like she represented them. And
13 I pointed out, solicitor's job is to represent
14 the district, not you. The district -- the
15 solicitor tries to keep you from doing things
16 that you shouldn't do.

17 I have seen, say, couple times at
18 meetings, well, hold on a second. That is not
19 for this meeting, or be careful if we are
20 talking, hey, that is -- no, that is
21 deliberation. That happens out there. Don't
22 even discuss something like that, not that we
23 were. But if she could feel the conversation
24 was going a certain way, she would say, no, stop
25 that.

1 So, she is in the interest of the
2 district. And Mrs. Brent said we didn't feel
3 like she represented us. So --

4 Q. Do you know -- did you ever hear any
5 specific examples of what it was that made Ms.
6 Brent believe that she --

7 A. No, she never -- even after this, that
8 is the only thing I ever heard. No one ever
9 came up to me later on and said, hey, Chris,
10 this is why we did this, this is why I believe
11 that. No one ever -- it was never discussed.
12 At least with me, it was never discussed again.

13 Q. There has been discussion in previous
14 depositions that one of the examples that
15 several board members pointed to was regard with
16 an incident with the Byrnes Education Center,
17 there was a parent who wanted to hear the
18 curriculum and apparently had difficulty finding
19 that out. And there was a meeting in which Ms.
20 Thomas participated, and as a result of that
21 meeting, Dr. Stoltz made -- announced his
22 intention to make a public statement about what
23 happened in that meeting.

24 A. Mm-hmm.

25 Q. Are you aware of those circumstances?

1 A. I am aware of the situation, what
2 happened.

3 Q. All right. One of the things
4 mentioned by a number of board members was that
5 they wanted Attorney Say to instruct Dr. Stoltz
6 not to make that statement because they felt
7 like it wasn't accurate.

8 Are you aware of that sentiment?

9 A. That whole situation, I think now that
10 you mention it, that someone might have said
11 something about that, that she didn't stop him.
12 Of course, the period of time that happened, I
13 can't remember if it was February or something,
14 March, you know, they said from the very get-go
15 in January that we can't work with her. That
16 was before anything happened, before they had
17 the board meeting with her.

18 That was back in January. I was
19 watching that meeting, January 11. Yeah, I
20 mean, board members are not supposed to go down
21 there and get involved in discussion between a
22 parent and somebody else. And that whole thing
23 blew up and we were going to lose a good
24 partner.

25 Q. All right. Mr. Guistwhite

1 characterized Dr. Stoltz's actions as damage
2 control to try to get Byrnes --

3 A. Yeah.

4 Q. -- back?

5 A. Try to get them back, yeah.

6 Q. Is that your understanding?

7 A. That was my understanding, that it was
8 kind of like, you know, trying to fix the
9 situation. That was going off the rails and we
10 were going to lose somebody who was a great
11 partner for us.

12 Q. Okay. And I think Mr. Guistwhite
13 indicated that he was concerned about losing
14 Byrnes because it seemed to be a popular program
15 with a lot of parents?

16 A. Yes.

17 Q. What is your -- what was your
18 experience or your understanding of --

19 A. My understanding was that when never
20 heard a complaint, never had a problem with it.
21 That they came in and do a very good program.

22 And what could have been just a plain
23 simple -- I understand from talking to -- from
24 hearing about what happened, what could have
25 been a simple conversation ended up being very

1 bombastic and very confrontational.

2 And then Byrnes was just, like, we are
3 done with this district then if this is how we
4 are going to be treated. Especially as a board
5 member, you know your actions, your presence,
6 you know, has weight. I know if I go into a
7 building, that I am not the teacher who worked
8 here for 30-some years, I am a board member now.
9 And I got to be careful what I say and what I
10 do.

11 And, you know, I always said when I
12 retired from teaching, one thing I wanted to get
13 back was my freedom of speech. And I never got
14 that back because I went right to being a board
15 member. There is things I know that I can't
16 say.

17 Mr. Bonn just pointed out that
18 concession. I don't tell my wife stuff that
19 happens. How did the board meeting go? Hmm,
20 stuff. I know I can't tell. So, I am still --
21 my freedom of speech is -- and knowing as a
22 board member when you go into situations where
23 you are at places, you know, even when I go out,
24 you know, I am still that public figure. And I
25 don't, you know, raise hell or anything like

1 that because I represent the school district,
2 too.

3 Q. Did you -- your understanding about
4 what occurred at the Byrnes Center meeting that
5 Ms. Thomas attended with the parent, did you
6 speak to anyone who -- you weren't in attendance
7 at that meeting?

8 A. I was not in attendance, but I spoke
9 with Mr. Gay.

10 Q. Mr. Gay was at the meeting?

11 A. Yes, he was.

12 Q. How did he describe it?

13 A. That it went off the rails quickly.
14 They came in and it was -- his -- what I felt he
15 was saying was they weren't waiting to have a
16 discussion, they wanted to jump from this person
17 right away.

18 Q. Who is they?

19 A. They. Mrs. Polk was coming in hot.

20 Q. Was that the parent?

21 A. Parent, yeah.

22 Q. That was the parent that made the
23 complaint?

24 A. Made the complaint. She didn't want
25 to hear anything. And they just -- and then

1 apparently Mrs. Thomas joined in and the meeting
2 went off the rails real quick.

3 It was not what you consider a
4 professional -- as I understand it from Mr.
5 Gay's characterization, was not a professional
6 meeting.

7 Q. Okay. Do you have any reason to doubt
8 Mr. Gay's truthfulness in the way he portrayed
9 what happened at the meeting?

10 A. No.

11 MR. ELLIOTT: Give me just a second to
12 review my notes. I think I covered pretty much
13 everything?

14 (Discussion off the record.)

15 MR. ELLIOTT: If you have any
16 follow-up, go ahead. I think that is all I
17 have.

18 EXAMINATION

19 BY MR. BONN:

20 Q. When Heidi called you regarding Kevin
21 Hall, I believe your testimony is she said we
22 are going to hire a new solicitor, correct?

23 A. Yeah.

24 Q. Did she say who we was?

25 A. No.

1 Q. Did she tell you how any of the other
2 board members were going to vote?

3 A. No.

4 Q. And you -- did you watch the April 11
5 meeting in preparation for this deposition
6 today?

7 A. Yes. In fact, I watched it this
8 morning while I was doing laundry.

9 Q. Do you recall Kelly discussing --
10 Kelly Brent discussing the reason why she was no
11 longer in favor of pursuing the RFP process
12 during that public meeting?

13 A. Can I refer to my notes?

14 Q. Yes.

15 A. I don't see that on there. I don't
16 want to convolute that thought with another.
17 That she has said that she didn't feel -- she
18 felt that it was not going in a direction she
19 wanted it to, or too many people were getting
20 involved, it was getting too convoluted. I
21 can't remember the exact phrasing. But it was
22 in connection she felt it was getting away from
23 what she intended or she thought the RFP should
24 be. Too many fingers in the pot, type of thing.
25 Q. So, she made that statement during the

1 public meeting?

2 A. During the public meeting on April 11
3 -- I am trying to be sure. I have heard it so
4 many times. I don't know if she said it exactly
5 at that meeting or not.

6 Q. When you watched the video today, did
7 you just watch the portion leading up to the
8 vote to change of solicitor? Or did you also
9 watch the portion where they talk about
10 suspending the policy?

11 A. I watched from the suspension of
12 Policy 005. Yeah. I watched from that. That
13 was the first business item after the public had
14 a chance to talk.

15 Q. Okay. Do you recall Kelly discussing
16 dissatisfaction with Attorney Say?

17 A. Dissatisfaction with --

18 Q. Attorney Say.

19 A. Attorney Say. I remember her saying,
20 I believe it was at that meeting, she felt that
21 Attorney Say didn't represent them and their
22 interests.

23 Q. Do you know who she was referring to
24 as they or them?

25 A. My assumption would be majority of the

1 board, what you call majority, which would be
2 the five -- four new members and Heidi Thomas.
3 You can't say majority because there is still
4 majority Republican. You can't say majority of
5 new people because Heidi was still on there.
6 She was re-elected. So, whatever.

7 Q. So.

8 A. That is what I inferred from it. That
9 was the specific -- it could be from Heidi for
10 all I know.

11 Q. Just for the record, when you are
12 saying -- when you refer to the majority
13 members, you are referring to Heidi Thomas,
14 Kelly Brent, David Brinton, Brenda Cox, and
15 Mandy Davis?

16 A. Yes.

17 Q. Would you consider Kelly's statements
18 about her dissatisfaction with Brooke Say to be
19 a deliberative -- a deliberation?

20 A. No.

21 Q. Why not?

22 A. I just take that as -- what in
23 particular? There was no follow-up.

24 Q. Wasn't she explaining why --

25 A. She was just saying that --

1 Q. -- she wanted to replace the
2 solicitor?

3 A. She said we were dissatisfied, and I
4 know Abby said, what is the rush? And Heidi
5 said what we feel is legal. Didn't answer the
6 question, what is the rush. And I said, why
7 must it be done now? And there was silence.
8 Then they decided to vote on that policy. At
9 which point I put forth a motion to table this
10 and it was defeated, and then they voted to
11 suspend Policy 005.

12 So, the very next thing that anyone
13 said, Kelly said was, I move to appoint Kevin
14 Hall as our solicitor. So, if you make a
15 statement saying I am dissatisfied, the question
16 is why. That leads to more deliberation. I
17 think it is more of a statement than a
18 deliberation.

19 Q. Do you recall David Brinton talking
20 about the fact that Tucker Arensberg was in
21 Pittsburgh?

22 A. My notes here say David did not
23 interview him. Talked to him on the phone when
24 it became apparent that -- when it became
25 apparent we were moving that way on Friday.

1 Mr. Hall called Kelly. David Brinton
2 -- did he bring it up they are from Pittsburgh?
3 I don't believe so. I believe I brought it up
4 they are from Pittsburgh. Somebody said it.

5 Q. Okay. Somebody --

6 A. Somebody brought it up that their law
7 firm is centered in Pittsburgh. And if we
8 needed them -- I said that, if we needed people
9 to come in for things, is that part of the cost?
10 We were down at the cost part. It was, are we
11 going to be charged for that.

12 Q. You have watched the video more
13 recently than I have. Was there anything that
14 David Brinton said regarding that Tucker
15 Arensberg as a firm had experience in education
16 law?

17 A. No, I don't remember any of that. All
18 I remember him saying, I Googled it.

19 Q. Okay.

20 A. You know, Googled him. So, I don't
21 recall him saying that. I took pretty good
22 notes here. I am not a stenographer. So, of
23 course, reading my handwriting looks more like
24 hieroglyphics.

25 No, I said he said he talked to him on

1 the phone Friday before the vote. And next
2 thing I had him saying was that he -- someone
3 said how do you know anything about him, he said
4 I Googled him. It is called Google. He said it
5 is called Google.

6 Q. He was answering questions?

7 A. To the audience. It wasn't from me.

8 Q. Moving on to this e-mail between you
9 and Thad Eisenhower. That is Brent 11, maybe.

10 MR. ELLIOTT: It is 10.

11 BY MR. BONN:

12 Q. Would you agree that Mr. Eisenhower
13 was trying to convince you to vote in favor of
14 Kevin Hall?

15 A. Yes. I think he was trying to lay out
16 his points about why -- why -- he prefaced it
17 with he was tired of the arguing going back and
18 forth. I am at the beginning here. Solicitor
19 issue was getting out of control. Minority
20 seems to want to keep existing solicitor, so
21 does administration. Wants to change due to the
22 fact I am hearing solicitor does not listen to
23 them. She listens to administration as well as
24 minority. But not certainly the majority in the
25 same capacity. Hence, the majority wants a new

1 solicitor. They have every right to do that.

2 Talking about Independence Law Center.

3 He is a resident of New Cumberland, an
4 upstanding individual and many community
5 services. He may have limited experience in
6 education law. But if he says he is confident
7 he can do the job, I stand by him to show up to
8 support him. He is not extremist, he is
9 moderate discussions.

10 So, sounds to me like he is trying to
11 lay a foundation for me to support Mr. Hall. I
12 would characterize that.

13 Q. And you -- would you -- would it be
14 fair to say that -- well, you wrote an e-mail
15 back to him, and your writing is in italics?

16 A. Yes, it is.

17 Q. Would it be fair to summarize that you
18 were not in favor of Kevin Hall being the
19 solicitor?

20 A. From my points I was making here, I
21 don't care where he is from. He is here, the
22 rest of the firm is in Pittsburgh. So, seems to
23 me it is a point-by-point item, which is what I
24 do with people. I counter their argument. And
25 through this here I am saying that from what I

1 know and everything like that, I would not be
2 supportive of him just because, one, he is from
3 New Cumberland, or his experience.

4 The board starts, we were arguing
5 about the RFP process trust. Yeah. So, I -- I
6 would say to him -- I am saying that best
7 interests -- pointing out that they should work
8 with people better and not try to think they are
9 the only ones who run the district. Work with
10 us.

11 His firm is out in Pittsburgh, that
12 was No. 2. No. 3, I don't care where he lives
13 at. I don't owe him loyalty because someone is
14 from New Cumberland. We are in the position we
15 are in because -- one person tried to go out and
16 hire somebody who has not been vetted.

17 Again, so, there is things here I am
18 saying that I trust going through a process and
19 not shortchanging it. This was after I had
20 found out -- I believe the date on this --
21 original date is the eighth. Yeah, Monday the
22 eighth, so I found out Friday. So, I found out
23 on the Friday fifth beforehand. So, at that
24 time I probably did some research trying to
25 figure out everything, who he was.

1 Since he is not a board member, I am
2 not deliberating with a board member.

3 Q. Understood. And I think that is in
4 the training that you received from Stock and
5 Leader, that you are allowed to say anything at
6 all to a constituent, correct?

7 A. Mm-hmm.

8 Q. And Kevin Hall is a --

9 A. I'm sorry, yes.

10 Q. Kevin Hall is a constituent of the
11 West Shore School District, he is a resident of
12 New Cumberland to your knowledge, correct?

13 A. Yes, he is.

14 Q. So, there would be nothing preventing
15 you from calling Kevin Hall and talking to him
16 as a constituent?

17 A. Calling him and talking to him, no.
18 Offering him a position, that would be
19 different. But nothing would stop me from
20 talking to a constituent, no.

21 Q. And would anything prevent you from --
22 does the Sunshine Act prevent you from talking
23 one-on-one with a potential vendor of the school
24 district?

25 A. I would never talk to a vendor.

1 Q. But that because of the Sunshine law
2 or is that --

3 A. Sunshine law, oh, boy. It is -- I am
4 trying to remember what area that was. I
5 believe -- I think it would -- again, my
6 understanding is, I don't talk to vendors
7 because it is a conflict of interest. It makes
8 it look like I am trying to get somebody
9 business. I mean, like that talk to a vendor?
10 Or have a friendly conversation?

11 Q. Well, let's say there is an agenda
12 item and there is three vendors that you can
13 pick from on an agenda item. Would anything
14 prevent you from contacting all three and
15 getting additional information to inform
16 yourself how you are going to vote?

17 A. Anything stopping me from contacting
18 three potential vendors, asking questions. It
19 is, like, beyond my purview to do that.

20 I really would not do that, because in
21 your conversation you could make -- you could
22 intimate promises, like, I want to pick you, or
23 I want to go with you. I wouldn't personally do
24 that. I think you are just setting yourself up
25 for -- does it say specific in the Sunshine law

1 about that, I am not too sure about that.

2 But I know in best practices what they
3 told us about, don't set yourself up for a
4 conflict of interest.

5 Q. That is my next question. Would it
6 violate the Sunshine Act if you called a vendor
7 and said, I like your service the best, I am
8 going to vote for you? Would that violate the
9 Sunshine Act?

10 A. To me, Sunshine law is your
11 deliberation amidst the body, amongst the board.

12 Q. Understood.

13 A. I would not say -- again, I would
14 never do that. Is there something that stops me
15 from doing that, there is probably better legal
16 minds than me. But I would -- to call someone
17 and say I am going to vote for you, I don't
18 know. I don't believe so. I wouldn't do that
19 because it is not good practice to do that.

20 Q. There is some statements that you made
21 to Thad Eisenhower would you agree are critical
22 of the majority members of the board?

23 A. That I make?

24 Q. Yes.

25 A. Oh, yeah. Again, we are trying to

1 work with them. And I think I have a better
2 working relationship, I think on the board, to
3 understand things a little better, that you have
4 to work as a group. You can't just go by
5 yourself and do stuff. You should work with
6 everybody and keep everyone informed.

7 Q. At one point do you say, they have
8 decided to create an air of fear and mistrust,
9 results will be the district losing qualified
10 individuals who will leave to get away from the
11 culture war started by the new members?

12 A. Yeah. When I have a principal tell me
13 that some board member came in and said you are
14 not going to be fired, we'll take care of the
15 other ones, I think that is creating a fear.

16 Q. When -- who said that?

17 A. One of the new board members has said
18 that to one of our principals. That to me is
19 creating an air of fear. And we have seen
20 what's happened in York County. We are getting
21 people up here because they want to leave what's
22 going on. People don't want chaos going on in
23 their lives.

24 Q. How have they started culture wars,
25 the majority members?

1 A. Culture wars, brings in, like, the
2 Independence Law Center. Again, just on their
3 own they brought them in here. And their
4 records from what I have seen is let's stir
5 things up, get you into court. We'll do it pro
6 bono, but you wind up paying for it. That is
7 why -- and tackling issues that I don't think
8 need to be in the forefront, that we need to
9 worry about.

10 Right now we are worrying about going
11 about bathroom policies and sports and items
12 like that, which I don't think are the most
13 important thing for us to deal with. I would
14 rather see us deal with cell phones and stuff
15 like that. Other --

16 Q. Is it fair to say that you oppose at
17 least some of the their political agenda?

18 A. Going on the school board, I am not
19 supposed to have a political agenda. That is
20 why you can cross file. I agree with a lot.
21 Mrs. Brent and I had coffee before she was sworn
22 in. We had a lot we agree on.

23 So, I do not -- I am not against all
24 of what they do. And there is -- I am not a fan
25 of process, things that violate process, how

1 things should be done. And I don't want to
2 create chaos. If you want to do this, talk to
3 me. Hey, we are looking at doing this. Okay,
4 well, I support you on that.

5 So, we had a discussion. We had a
6 very good discussion. We talked for a couple
7 hours. Same with Dave Brinton. I had coffee
8 with him before he was on the board. It is,
9 like, okay, let's see where you are at. And
10 there was a lot of things we agreed on.

11 Q. But there are items of their political
12 agenda that you don't agree with?

13 A. Yeah. And I still have a problem with
14 political agenda. Because you shouldn't have a
15 political agenda when you are coming onto the
16 board. You should be making a district agenda.

17 What their political agenda is, what
18 their -- who their backers are what they are
19 stating in the papers they had them sign, I
20 don't agree with a lot of things in there. And
21 I think we should be of independent thought,
22 independent person. And not, you know, take
23 your direction from outside sources.

24 I think when you come in here and you
25 make decisions. We are privy to a lot more

1 information than the outside people do. And we
2 make decisions based on that information, not on
3 our preconceived -- not looking around the
4 library for a banned book or something like
5 that. Come in here and just do your job in
6 making sure our district runs the best.

7 Q. In your understanding of the Sunshine
8 law, does it -- --

9 A. You don't mind if I face you this way?

10 Q. No.

11 A. I broke my neck 20 years ago.

12 Q. No, I am just trying to think of my
13 question. I had it in my head, then it kind of
14 went somewhere.

15 A. I'm sorry. I have lumbar problems,
16 broken neck in two places. So, you'll see me at
17 meetings turn my chair all the way around.

18 Q. In your understanding of the Sunshine
19 law, does it require the school board to issue
20 an RFP to change solicitors?

21 A. No. That is -- as I stated before,
22 even Mr. Guistwhite brought up that's the
23 process we used to hire one, to make sure --
24 like, right now we did an RFP for
25 transportation. We got three different bus

1 companies, two, three very good ones, and we are
2 going through that.

3 Picking one out of the yellow pages --
4 not that that happened here, but picking an
5 electrician out of the yellow pages is not what
6 you want to do. You want to make sure, just
7 like construction, we are dealing with public
8 money. You have to put things out on bids if
9 you are going to spend more than -- I might get
10 this wrong -- I think it is \$20,000 or something
11 like that, it has to go out on bids. To me,
12 that is part of an RFP process.

13 Q. There is -- but that is -- the reason
14 you support an RFP process is because you think
15 it is good governance, not because it is
16 required by the Sunshine Act?

17 A. No, no. What I would call best
18 practices. And her reasoning back in January
19 from Mrs. Brent was I want to make sure we are
20 getting the most bang for our buck. Okay.
21 Sounds good. Let's do an RFP so everyone can
22 come in here and tell us this is what we charge,
23 this is what we charge, this is our experience,
24 stuff like that.

25 If that is your reasoning, that is

1 fine. Nobody should be afraid of that.

2 Q. Now, I think everybody agrees if the
3 five members -- majority members had met
4 privately and hired Kevin -- signed an
5 engagement letter with Kevin Hall on behalf of
6 the district, that would violate the Sunshine
7 Act, correct?

8 A. Yes, if they all got in a room. There
9 is a case down in Manheim Township where nine
10 board members went out to dinner together and
11 discussed school business, and they violated the
12 Sunshine law. You know, that is what you are
13 talking about. They all sat down --

14 Q. Yes.

15 A. -- in a room. But also from my
16 understanding was a meeting of the minds. If I
17 call one person at a time and add up to five, I
18 have a meeting of the minds.

19 Q. But you don't have any proof that any
20 of the five majority members called the other
21 four and asked them how they were going to vote,
22 correct?

23 A. I don't have any proof of that.

24 Q. What was the issue -- I mean, this
25 case doesn't involve Kevin Hall being hired

1 outside of the public meeting. There was a
2 public meeting at which he was hired.

3 And what was -- what about that
4 meeting violated the Sunshine law?

5 A. It was --

6 MR. ELLIOTT: Objection to the form,
7 to the extent that is intended to summarize the
8 complaint in any way.

9 MR. BONN: Understood. Go ahead.

10 THE WITNESS: Rephrase.

11 BY MR. BONN:

12 Q. Oh, what --

13 A. If that is the proper term.

14 Q. Yeah. Would you -- well, let me say
15 it this way. Are you testifying that the vote
16 that they took to hire Kevin Hall violated the
17 Sunshine Act?

18 A. My point is, they had deliberation
19 ahead of time violated. The deliberation
20 beforehand, and the fact I am sitting there and
21 no one is giving me reasons why, that to me is
22 problematic.

23 Q. What proof beyond assumption or
24 speculation?

25 A. I have no proof.

1 Q. So, you have no proof they actually
2 did deliberate?

3 A. I have to go through what I would
4 assume.

5 Q. Because you seem very certain in your
6 testimony that they violated the Sunshine Act.

7 A. In my opinion, they did. That would
8 be just my opinion.

9 Q. That is your opinion based on
10 speculation, correct?

11 A. That is my opinion based on my
12 experience that if I see people who don't want
13 to discuss anything or give me a reason on such
14 -- in such a packed house, and nobody wanted to
15 speak up and say anything or give me a reason
16 why. Give me a reason -- to me, you are hiring
17 somebody you like. I have seen people put in
18 their two cents on simpler projects, simpler
19 things.

20 It is -- you know, is it my opinion,
21 yes, from my experience. And I have been around
22 boards for a long time.

23 Q. But no direct evidence that they --

24 A. I do not have a call log that shows
25 that they called each other, you know, during

1 that time. I don't have that. I don't have
2 access to that. But it is my opinion.

3 Q. Okay. Now, you disclosed your
4 telephone records?

5 A. Yes.

6 Q. So, those could be turned over in
7 discovery to plaintiffs, correct?

8 A. Yes. I had asked for clarification.
9 It wasn't from you, Mr. Bonn, it was from
10 another attorney going through this, I don't
11 know who, I was trying to figure out if I had to
12 do the whole, you know, from -- I can't
13 remember, was it from October or something all
14 the way through, whatever it was, or did you
15 want just this period of time, April 11.

16 So, I originally gave you April 11,
17 then you did communicate back to me, or your
18 secretary did, said, no, I want everything. So,
19 yes, I have turned everything over. Nothing was
20 redacted. I put everything out there.

21 Q. Now, just so you know, I did redact
22 from the log that you gave me anything that was
23 unrelated to conversations with school board
24 members.

25 A. Yeah, I remember the one question your

1 secretary asked, who is Matt? I said, that is
2 my son, Matt. She wanted to know if it was Matt
3 Gay. And I said and Ryan is my son Ryan, not
4 Ryan Argot. It was, like, common names there.

5 Q. So, but, in reviewing those phone
6 records, is it true that you do from time to
7 time have conversations with other board members
8 over the telephone?

9 A. Mm-hmm.

10 Q. Is that --

11 A. Yes. I'm sorry.

12 Q. Is that -- are some of those
13 conversations related to school board business?

14 A. Jeez, is it related to school board
15 business. Usually most times we have just
16 conversations. Brian, I am putting a floor in,
17 I called him a lot about that, putting a kitchen
18 in. Do you want to get together, have breakfast
19 and catch up on your life and everything like
20 that.

21 Talking to school board business, we
22 don't sit there -- I never sat there and said,
23 okay, let's go over the agenda and talk about
24 stuff.

25 Q. Yeah. Would it be okay to discuss

1 matters of school board business with other
2 board members?

3 A. Would it be okay. Again, this comes
4 to the question of discussion and deliberation.
5 You know, discuss things -- I mean, I don't get
6 into deep discussions on things. I am trying to
7 think of an example where, you know, did you see
8 we are voting on something like that. I am
9 trying to think of anything where we say
10 anything like that.

11 Is it okay to discuss things, I would
12 imagine you could discuss things without
13 deliberating it.

14 Q. Yeah. That is what -- I'll give you a
15 hypothetical. Let's say there is a contract for
16 approval on the agenda --

17 A. Mm-hmm.

18 Q. And there is a section of the contract
19 that you don't understand what it means. Would
20 it be okay --

21 A. Yeah.

22 Q. -- to call another board member and
23 say what does this --

24 A. Somebody with greater experience.
25 Like, hey, Brian, you have been through this,

1 tell me, what is this term -- or HP McClure has,
2 they have it some kind of program. What is that
3 program? And you could have something like
4 that.

5 Q. So, that is okay as long as you are
6 not deliberating --

7 A. I am going to vote against it because
8 I don't like that. I shouldn't discuss my
9 votes.

10 Q. Yes. Now, there is an allegation in
11 the complaint that the, quote on quote, minority
12 board members, which would be you, Brian
13 Guistwhite, Abby Tierney, Adam Trone --

14 A. Mm-hmm.

15 Q. -- that they were -- that you were
16 excluded from the deliberations regarding Kevin
17 Hall.

18 A. Mm-hmm, yes.

19 Q. Would you agree with that allegation?

20 A. Yes.

21 Q. And, so, Heidi excluded you by calling
22 you and telling you that --

23 A. Telling me is not a deliberation.

24 Q. -- this was going to be on the agenda?

25 A. When I was asking questions, she

1 didn't answer them.

2 Q. Did you ask her questions on the
3 phone?

4 A. I asked her questions on the phone.

5 Q. And she wouldn't answer your
6 questions?

7 A. She wouldn't answer my questions on
8 the phone. Then at the meeting where I was
9 asking questions, why did we abandon the
10 process? How was it stalled? No answer. I got
11 a deer in headlights. Who did the interview?
12 No answer. Abby Tierney, did you interview? I
13 did not interview him. These are questions I am
14 asking her, why must it be done right now? No
15 answer.

16 Mr. Hall called me two weeks ago.
17 What did you say? How things are going? Why
18 did you choose him? No answer. That is not a
19 deliberation. That is me asking questions and
20 not getting any feedback.

21 Q. I want to follow-up on what you
22 testified to though about you asked Heidi
23 questions on the phone.

24 What questions did you ask her on the
25 phone?

1 A. The question I asked, did the
2 committee approve this? I don't know anything.
3 I don't know. Did the administration interview
4 him? Not that I know of. You know, or I don't
5 know, you know, it is, like, it was in the
6 negative. So, well, I have to hurry, I got to
7 call someone else. You know, so, that was the
8 end of the conversation. But, again, I am out
9 there walking around heading into a restaurant.

10 Q. If one of the board members had told
11 you, I am dissatisfied with Brooke Say's
12 performance and I don't think I can attend
13 another meeting with her being the solicitor,
14 would that violate the Sunshine Act?

15 A. No.

16 Q. Now, regarding the -- your
17 conversation about the Byrnes Group, I believe
18 your testimony was that Heidi was endangering
19 the school district's contract with that vendor,
20 correct?

21 A. Yes. From what I understand from my
22 conversation with Mr. Gay.

23 Q. Did you know that vendor did not even
24 have a written contract with the school
25 district?

1 A. I did not know that.

2 Q. And you weren't present for that
3 meeting?

4 A. I was not present for that.

5 Q. And I believe that your testimony was
6 that it was not appropriate for board members to
7 attend that meeting?

8 A. That's what I said, yes.

9 Q. So, is it your testimony that board
10 members should not advocate on behalf of parents
11 regarding issues the parents have with the
12 district?

13 A. My position is, I have had many
14 parents ask me, talk to me, and what I have
15 always told them is contact the proper person.
16 I don't go in there and advocate for them
17 specifically, because there is three sides to
18 every story. I learned that from teaching.
19 There is your side, their side, and there is the
20 truth in-between.

21 I am not going to go in there. It is
22 not my position to do that. Do I pass along
23 information? Yeah, I can pass along
24 information. But I am not going to go in there
25 with them. Like, if there is a meeting with the

1 principal and go in there and say I demand you
2 satisfy them, because I don't know if that is
3 the truth. That is not my position as a school
4 board member.

5 School board member, we take care of
6 the budget, we hire, we okay the hiring going
7 on, personnel. We approve policies. We are --
8 you have parents who will ask questions. Like
9 me, I get asked about the natatorium
10 all the time. I was, like, I'll check into it
11 and I'll get back to you. Am I going to go into
12 a meeting with the parent and yell at Mr.
13 Sanders about the natatorium? No, I am not
14 going to do that.

15 Q. Now, Heidi Thomas testified that Dr.
16 Stoltz apologized to her for his public
17 statement regarding the Byrnes Group.

18 Were you aware of that?

19 A. No.

20 MR. BONN: That is it.

21 MR. ELLIOTT: Just real quick.

22 RE-EXAMINATION

23 BY MR. ELLIOTT:

24 Q. The notes you are referring to, are
25 those just personal notes you took?

1 A. Those are my personal notes I jotted
2 down from the January 11 and April 11 meeting
3 just to refresh my memory.

4 Q. Right. That is -- you took those
5 notes while you were watching the video?

6 A. While I was watching the video this
7 morning, yes.

8 Q. Earlier today David Brinton indicated
9 that it is common for votes to take place
10 without any deliberation in the meeting.

11 Is that your experience?

12 A. For minor things, yeah. There are
13 votes that come along in any discussion, you
14 know, simple approvals or something like that.

15 Q. Would those be the kind of things that
16 are approvals that are something that the
17 administration staff has --

18 A. For example, personnel. I am not
19 going to deliberate on personnel. You know,
20 that might come through.

21 There is other things that have come
22 up, like, for example, when we get a furnace,
23 new furnace put in, yeah, there was discussion
24 on that. Is everything discussed? Not
25 everything is a discussion, no.

1 Q. Typically have you received
2 information about the votes with enough time to
3 satisfy yourself that you are -- you know what
4 you are voting on and whether it is appropriate?

5 A. Yeah. Usually -- I always read my
6 agenda, what's going on. I read board notes
7 every week that the superintendent sends out.
8 Sometimes you have a question you might ask, you
9 might send an e-mail out for clarification.

10 Do we have discussions? Yeah, we do
11 have discussions and we'll talk about things
12 before we vote.

13 Q. Okay. With respect to voting on
14 something such as the solicitor, is that the
15 kind of thing you would expect would have no
16 deliberation?

17 A. I would not expect to have no
18 deliberation on that, especially when there was
19 no interview, you know, even -- even we get --
20 they would bring in somebody -- again, I keep
21 referring to coaches. I think last time we had
22 a coach, they brought him in to executive
23 session so we could talk, hey, how is going,
24 meet the person. Or talk to him out there in
25 the board meeting or something.

1 When you have no knowledge of somebody
2 and no one interviewed, I would love to have a
3 sit-down and have an interview and talk. I
4 would expect that at some point, especially if
5 you are getting heat, give me the reason why.

6 Q. Right. Just to be clear, prior to
7 April 11, there was never an executive session
8 or public meeting where the possibility of
9 Attorney Hall being hired as a solicitor was
10 brought up in any way?

11 A. No. Back in January 11, Mrs. Brent
12 brought an RFP. You know, at that point she
13 wanted a new solicitor. And I think our
14 previous meeting in December. That was it.

15 That was kind of a surprise, but we
16 discussed it and said let's work together. But
17 I never heard the name of Mr. Hall until --
18 Heidi probably told me his name at the time she
19 called me. That would have been the first time
20 I heard of it.

21 MR. ELLIOTT: Okay. That's all I
22 have. Nothing else.

23 MR. BONN: I am done.

24 (At 4:42 p.m., the deposition concluded.)

25 * * * *

1 County of Lancaster:

2 SS

3 Commonwealth of Pennsylvania:

4

5

6 I, Angela N. Kilby, Reporter, Notary
7 Public, duly commissioned and qualified in and
8 for the County of Lancaster, Commonwealth of
9 Pennsylvania, hereby certify that the
10 deponent/witness came before me, who was duly
11 sworn/affirmed by me to testify to the truth of
12 his/her knowledge concerning the matters in
13 controversy in this cause.

10

11 I also certify that the questions and
12 answers were recorded by me in stenotype, to the
13 best of my ability, and subsequently reduced to
14 computer printout under my supervision, and that
15 this copy is a true and correct record of the
16 same.

14

15 I further certify that I am not a
16 relative or employee of counsel or the parties
17 hereto. This certification does not apply to
18 any reproduction of the same by any means unless
19 under my direct control and/or supervision.

17

18 Dated this 4th day of March, 2025.

18

19



20

21 Angela N. Kilby - Reporter
22 Notary Public

21

22

23 Commission Expiration: June 2, 2027

23

24

25

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