

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

KHADIDJA ISSA, ET AL            ) 5:16-cv-03881-EGS  
  )  
VS.                                    ) AM SESSION ONLY  
  ) August 17, 2016  
THE SCHOOL DISTRICT OF        ) Allentown, PA  
LANCASTER                         ) 9:32 a.m.-12:43 p.m.

HEARING ON PRELIMINARY INJUNCTION  
BEFORE THE HONORABLE EDWARD G. SMITH,  
UNITED STATES DISTRICT JUDGE

APPEARANCES:

For Plaintiff:                   ERIC J. ROTHSCHILD, ESQ.  
  KATHLEEN A. MULLEN, ESQ.  
  PEPPER HAMILTON LLP  
  18th and Arch Streets  
  3000 Two Logan Square  
  Philadelphia, PA 19103  
  KRISTINA MOON, ESQ.  
  EDUCATION LAW CENTER  
  1315 Walnut Street  
  Suite 400  
  Philadelphia, PA 19107  
  MOLLY M. TACK-HOOPER, ESQ.  
  ACLU OF PENNSYLVANIA  
  P. O. Box 60173  
  Philadelphia, PA 19102  
  
  WITOLD J. WALCZAK, ESQ.  
  ACLU OF PENNSYLVANIA-  
  PITTSBURGH CHAPTER  
  313 Atwood Street  
  Pittsburgh, PA 15213  
  Philadelphia, PA 19103  
Veritext National Court Reporting Company  
  Mid-Atlantic Region  
  1801 Market Street - Suite 1800  
  Philadelphia, PA 19103  
  1-888-777-6690

1 APPEARANCES, CONTD:

2 For the Defendant:

SHARON O'DONNELL, ESQ.

MARSHALL, DENNEHEY,

3

WARNER COLEMAN & GOGGIN

100 Corporate Center Dr.

4

Suite 201

Camp Hill, PA 17011

5

ECRO:

JAIME KULICK

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

Veritext National Court Reporting Company

Mid-Atlantic Region

24

1801 Market Street - Suite 1800

Philadelphia, PA 19103

25

1-888-777-6690

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

I N D E X

WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
ELYSE CHESSON	5	118		

E X H I B I T S

NO.	PAGE
Plaintiff's:	
52	12
16	117
26	117
40	117
52 to 58	117

1 P R O C E E D I N G S

2 THE CLERK: All rise.

3 (Call to Court)

4 THE COURT: Good morning. Thank you.  
5 You may be seated.

6 ALL: Good morning, Your Honor.

7 THE COURT: The Court is called to  
8 order. All parties previously present are once again  
9 present. We are continuing today with the plaintiff's  
10 case in chief. Is it Mr. Rothschild or Mr. Walczak?

11 MR. WALCZAK: Thank you, Your Honor.

12 THE COURT: Mr. Walczak.

13 MR. WALCZAK: Witold Walczak for the  
14 plaintiffs. We will call Elyse Chesson.

15 THE COURT: Very well. Good morning,  
16 ma'am.

17 MR. WALCZAK: Can I get the witness a  
18 glass of water?

19 THE COURT: Certainly.

20 THE CLERK: Please remain standing  
21 while the oath is administered.

22 ELYSE CHESSON, WITNESS, SWORN

23 THE COURT: Thank you very much, ma'am,  
24 and you may be seated. And, ma'am, would you please  
25 state your full name, spelling your last name for the

1 record.

2 THE WITNESS: Elyse Chesson, C-h-e-s-s-  
3 o-n.

4 THE COURT: Thank you very much, ma'am.  
5 Counsel, you may proceed.

6 MR. WALCZAK: May I approach?

7 THE COURT: Certainly, sir.

8 THE WITNESS: Thank you.

9 DIRECT EXAMINATION

10 BY MR. WALCZAK:

11 Q. Good morning.

12 A. Good morning.

13 Q. Is it, Ms. Chesson or Chesson?

14 A. Chesson.

15 Q. Chesson. We had a witness yesterday calling  
16 you Chesson.

17 A. Okay.

18 Q. And where are you from originally?

19 A. Canada.

20 Q. And is the French pronunciation, Chesson?

21 A. Well, that was my married name previously,  
22 so my maiden name was Fontaine, which is Fontaine and  
23 O'Connell.

24 Q. All right. Very good. Would you just tell  
25 us a little bit about your educational background?

1           A.    I have a degree in cultural anthropology and  
2 a degree in international relations with the minor and  
3 peace and conflict studies.

4           Q.    And did you work for an organization called  
5 Lutheran Immigration Relief Services?

6           A.    Refugee Services, yes.

7           Q.    Refugee Services.

8           A.    Yes.

9           Q.    And when did you start there?

10          A.    In December of 2015.

11          Q.    And what was your position there?

12          A.    I was the employment program manager.

13          Q.    And in order to get that job, did you have  
14 to undergo some background clearances?

15          A.    Yes, we did.

16          Q.    And which ones?

17          A.    PA State Police, fingerprinting, FBI,  
18 looking to make sure that you have no criminal history  
19 or child abuse clearances, what not.

20          Q.    So you went through both a FBI and a  
21 Pennsylvania State Police clearance?

22          A.    Yes.

23          Q.    Now, tell me a little bit about your  
24 responsibilities in that position.

25          A.    I oversaw the employment programs.  There

1 were various programs within that.

2 Q. I'm sorry, when you say that, you mean the  
3 Lutheran Services Agency.

4 A. Within the employment program, we had  
5 various programs. We had RSS and we had TAP Refugee  
6 Social Services, and TAP is Targeted Assistance  
7 Program. We also served TANF clients, Temporary  
8 Assistance for Needy Families and I oversaw all of  
9 that.

10 Q. Okay. And you used the acronym RSS. What  
11 is that?

12 A. Refugee Social Services.

13 Q. Now, this sounds like it's all about  
14 employment issues; is that right?

15 A. Yes.

16 Q. Okay. How is it or did you encounter school  
17 related issues early on in your tender?

18 A. Yes, I did.

19 Q. And how is it that school issues came to you  
20 as the head of employment?

21 A. A couple of different reasons. One of them  
22 would be that clients that I serve under the TANF  
23 program, Temporary Assistance for Needy Families,  
24 those single mothers have often school age children  
25 who attend school or not, and that's how I would've

1 come in contact with that.

2 Q. Now, I want to direct your attention to one  
3 of the Plaintiff's name, Qasin Hassan. Are you  
4 familiar with him?

5 A. Yes.

6 Q. Now, tell us about how you first got  
7 involved with this case, and let's take this from  
8 employment to how Qasin's situation came to you.

9 A. Well, when a refugee first arrives, they go  
10 through our R&P, which is reception and placement, and  
11 that's 90 days of case management, and once that 90  
12 days is up, if the client goes into an employment  
13 program, then they get continued services through our  
14 agency, and that's when the 90 days were up around  
15 November, December, and that's when I became Qasin's  
16 mother's case manager.

17 Q. Okay. And what is Qasin's mother's name?

18 A. Faisa.

19 Q. Okay. So would this have been sometime in  
20 mid-December?

21 A. In December I became aware of the fact that  
22 he had been denied enrollment, yes.

23 Q. Okay. And we'll get to that in a minute.  
24 And who was his, as you called it, R&P case worker at  
25 the time or when it was ending in December?



1 A. Megan Brown.

2 Q. And she also worked for Lutheran Refugee  
3 Services?

4 A. Yes.

5 Q. Okay.

6 MR. WALCZAK: Do we have the -- we're  
7 getting them. I'm sorry, Your Honor.

8 THE COURT: Certainly, sir.

9 MR. WALCZAK: It's not --

10 (Pause)

11 MR. WALCZAK: Sorry, Your Honor.  
12 Apparently the binders are downstairs for the day 2  
13 exhibits and we have an office on the second floor, so  
14 we're waiting for them to bring them up. I'm really  
15 sorry about that.

16 THE COURT: It's no problem at all. Do  
17 you want to take a brief recess?

18 MR. WALCZAK: Maybe just like ten  
19 minutes would be great.

20 THE COURT: Sure.

21 MR. WALCZAK: Yeah, my apologies.

22 THE COURT: Not at all. We'll stand in  
23 recess for ten minutes. If you're ready before then,  
24 just let Ms. Kulick know.

25 MR. WALCZAK: Great, thank you.

1 THE CLERK: All rise.

2 (Recessed at 9:38 a.m.; reconvened at 9:45 a.m.)

3 THE CLERK: All rise.

4 (Call to Court)

5 THE COURT: You may be seated. Thank  
6 you. The court is called to order. All parties  
7 previously present are once again present, the witness  
8 is on the witness stand. Mr. Walczak, you may  
9 continue.

10 MR. WALCZAK: Thank you, Your Honor, my  
11 sincere apologies --

12 THE COURT: No problem at all, sir.

13 MR. WALCZAK: -- for the glitch here.

14 BY MR. WALCZAK:

15 Q. Ms. Chesson, if you could open that binder  
16 in front of you and there are tabs on your right, and  
17 if you could go to tab 52.

18 MS. O'DONNELL: Wait, I'm sorry,  
19 (indiscernible).

20 MR. WALCZAK: I wanted to make sure you  
21 knew where we were.

22 MS. O'DONNELL: Okay.

23 MR. WALCZAK: Thank you.

24 Q. Do you recognize this document?

25 A. Yes.

1 Q. Okay. And what is it?

2 A. It would be a part of one of the bio-data  
3 and case notes that would've been for the R&P case  
4 file.

5 Q. So it's part of an R&P case file. What is  
6 that?

7 A. Reception and placement. Once a family  
8 comes in, there is data that's collected and it's kept  
9 in the system.

10 Q. Okay. And is it fair to say that this is  
11 kind of divided into two, the first section involves  
12 something called bio data?

13 A. Yes.

14 Q. Okay. And then another section is some kind  
15 of notes.

16 A. Yes, case notes.

17 Q. Okay. Is the bio data collected for every  
18 client that comes to you?

19 A. Yes.

20 Q. And is it maintained as part of the client's  
21 file?

22 A. Yes.

23 Q. And who makes the notes in the note section  
24 of this document?

25 A. The case notes would be compiled and written

1 by the case manager, or any other person who offered  
2 services within the agency during that first initial  
3 90 days.

4 Q. And are those notes entered  
5 contemporaneously?

6 A. Yes.

7 Q. And so is this a record that's held in the  
8 regular course of business by Lutheran Refugee  
9 Services?

10 A. Yes.

11 Q. Okay. And can you tell whose file this is?

12 A. It says Faisa Ahmed, principal applicant.

13 Q. And as you testified a moment ago, Faisa is  
14 who?

15 A. Qasin's mother.

16 MR. WALCZAK: Your Honor, I would offer  
17 this exhibit into evidence.

18 THE COURT: Attorney O'Donnell, is  
19 there any objection to Plaintiff's Exhibit 52?

20 MS. O'DONNELL: No objection.

21 THE COURT: Without objection,  
22 Plaintiff's Exhibit 52 is admitted into evidence.

23 (Plaintiff's Exhibit No. 52 received)

24 BY MR. WALCZAK:

25 Q. All right. I want to focus first on the bio

1 data form. If you could turn to the second page here  
2 at the bottom it's five zeros and a 2. And I'll be  
3 referring to those numbers for ease of reference and  
4 I'll just use the whatever non-zero digits are there.

5 A. Okay.

6 Q. At the very top of this page, it has a case  
7 number EG10108594. Where does that come from, do you  
8 know?

9 A. The State -- Department of State.

10 Q. Okay. So this is a document that's given to  
11 the agency by the State Department?

12 A. Yes.

13 Q. And do you know whether this is commonly  
14 called an I-94 form?

15 A. I-94 comes in different forms, I don't know  
16 that this is one, but.

17 Q. But this is a document from the State  
18 Department.

19 A. Yes.

20 Q. And reading down, it says bio data from and  
21 it looks Cairo City. What would that mean?

22 A. That that's the original source of where  
23 they were located and that information would've come  
24 from.

25 Q. And do you know what Cairo City is and where

1 that is?

2 A. Egypt.

3 Q. Okay. So is that Cairo?

4 A. Yes.

5 Q. And then beneath that, there's a little box,  
6 it says country/fled date Somalia, what is that?

7 A. That would've been where the refugee family  
8 originated from.

9 Q. And next to that is a date. What would that  
10 be?

11 A. The date that they left.

12 Q. Okay. Left Somalia.

13 A. Yes.

14 Q. And across from that, it says case size  
15 seven. What does that mean?

16 A. The family size.

17 Q. So it's the number of people in the family.

18 A. Yes.

19 Q. And then beneath that next to name it has  
20 Faisa Abdalla; is that correct?

21 A. Yes.

22 Q. So -- and then what's her ethnicity?

23 A. Somalia.

24 Q. There's something that says Asharoff (ph).

25 A. Yes.

1 Q. Do you know what that means?

2 A. It may be an ethnic minority, I'm not  
3 familiar with it.

4 Q. Now, below that, it says going down about  
5 two-thirds of the way on the page, there's a box that  
6 talks about languages, correct?

7 A. Yes.

8 Q. Okay. And next to English, there's some  
9 designations there.

10 A. Yes.

11 Q. What do those signify?

12 A. What the levels for reading, writing,  
13 speaking are and whether that's their native tongue.

14 Q. And for English it essentially says none.

15 A. Correct.

16 Q. And for Somali, it says some for reading and  
17 writing, and then good speaking, and yes is the native  
18 language; is that correct?

19 A. Yes.

20 Q. And then below that is school type.

21 A. Yes.

22 Q. So what would that be?

23 A. That would've been the school history for  
24 that particular individual.

25 Q. Okay. So we're here -- just to be clear,

1 we're talking about Faisa, correct?

2 A. Yes.

3 Q. Okay. The mother.

4 A. Uh-huh.

5 Q. And then at the bottom of the page is  
6 employment skill, what would that be?

7 A. What her previous employment was or what  
8 skills she has.

9 Q. Okay. And this is all data that is given to  
10 the agency by the United States State Department when  
11 the refugee arrives.

12 A. Yes.

13 Q. Now, just flipping through to page 7 at the  
14 bottom, now we've skipped a number of pages, what are  
15 those pages data for?

16 A. Each individual in the family.

17 Q. So after Faisa would be her children.

18 A. Correct.

19 Q. And on page 7, who is that for?

20 A. For Qasin Hassan.

21 Q. And Quasin Hassan is the gentleman who is a  
22 plaintiff in this case?

23 A. Yes.

24 Q. Now, at the top there, it says, date of  
25 birth, what's listed there?



1 A. September 1st, 1998.

2 Q. So how old was he at the time of his  
3 arrival?

4 A. You're asking me to do math here.

5 MS. O'DONNELL: I was going to say the  
6 same thing.

7 THE WITNESS: I don't know.

8 BY MR. WALCZAK:

9 Q. Was he 17?

10 A. I believe so, yes, around that age, 16 or  
11 17.

12 Q. And then next to that is country of birth,  
13 and what does that say?

14 A. Somali.

15 Q. Okay. Below that are a series of boxes, the  
16 first one says general health, and what does it say  
17 about Quasin's general health?

18 A. No post arrival treatment needed, x-ray  
19 finding mild dorsal scoliosis.

20 Q. So physically he would appear to be healthy.

21 A. Yes.

22 Q. And then below that is a box for languages.

23 A. Yes.

24 Q. And what does it say about his English  
25 proficiency?

1           A.    There is none.  No reading, writing, or  
2 speaking.

3           Q.    And he speaks Somali.

4           A.    Yes.

5           Q.    And below that is education, and there's  
6 nothing filled in.  What does that tell you, if  
7 anything?

8           A.    Either that there was no records or that  
9 there was no history or that wasn't filled in.

10          Q.    And is it unusual to have this bio data  
11 records have nothing listed under education for the  
12 students, school age children?

13          A.    No.

14          Q.    Some do though.

15          A.    Yes.

16          Q.    And then under employment, there's nothing  
17 listed again.

18          A.    Correct.

19          Q.    Okay.  If you could turn now to page 11 of  
20 this same Exhibit No. 52.  Now, before we get into  
21 some of the entries here, explain to us what this is.

22          A.    This would be case notes for the R&P 90 days  
23 of case management.

24          Q.    And R&P is resettlement and placement?

25          A.    Reception and placement, yes.

1 Q. And it looks almost like a time log, tell me  
2 how case workers are supposed to fill this out.

3 A. So every time a service is provided, or  
4 something pertinent that would be useful for the case  
5 file occurs, a case manager or someone offering those  
6 services within the agency would enter what they did  
7 and the date and sign.

8 Q. And is it always entered on the date that  
9 the activity occurred?

10 A. Generally that's practice; however, you have  
11 a certain amount of days that you have up to to enter  
12 those.

13 Q. So it's possible that something could be  
14 entered within a day or two if the person was busy?

15 A. Yes.

16 Q. Now, just going to the first entry there on  
17 9/9, so does that mean that's when they entered the  
18 country?

19 A. That's when they arrived at the airport.

20 Q. And do you know whether -- well, first let  
21 me ask you. Have you reviewed this file before?

22 A. I have in the past, yes.

23 Q. And did you review this file in preparation  
24 to help Qasin?

25 A. Yes.

1 Q. Okay. Tell me how it is that Qasin's  
2 situation first came to your attention.

3 A. It came to my attention through Megan Brown,  
4 who was the family's R&P case manager. There were  
5 also e-mails sent from the county assistance office,  
6 state -- questioning as to whether or not all of the  
7 school age children had been enrolled and if not, why  
8 not.

9 Q. Okay. And did you find out that a school  
10 age child of Faisa's had not been enrolled?

11 A. Yes.

12 Q. Okay. And who was that?

13 A. Qasin.

14 Q. As part of getting up to speed to understand  
15 what happened, did you review this file?

16 A. I skimmed some of that and also spoke with  
17 the R&P case manager, and the head of R&P, Melissa  
18 Orlando (ph).

19 Q. So the family would have arrived in  
20 Lancaster on September 9th, 2015; is that correct?

21 A. Yes.

22 Q. Now, in the fourth column from the left, it  
23 says -- well, let's talk about what the columns are.  
24 The first one is the date on which something occurred.

25 A. Yes.

1 Q. And then the second one all seem to say R&P,  
2 so that's reception and placement.

3 A. Yes.

4 Q. And that's the branch or division of your  
5 agency that's --

6 A. Yes.

7 Q. And then what does case load mean?

8 A. Generally that would just mean where that  
9 service occurred, but I'm not as familiar with R&P  
10 case notes as I am with --

11 Q. And then what's summary?

12 A. Generally what occurred, a title, a  
13 reference.

14 Q. And the note would be more details on what  
15 occurred?

16 A. Yes.

17 Q. Okay. And then that case worker's name is  
18 entered in that last column.

19 A. Correct.

20 Q. Okay. And if you could look at the second  
21 entry for 9/11, it seems to be the second row from the  
22 bottom of the page. What's that first sentence under  
23 note say?

24 A. Are you referring to the employment referral  
25 one?

1 Q. Yes.

2 A. "PA's oldest daughter and son decided they  
3 did not want to attend school, instead they picked to  
4 enroll into match program. Case manager set a date.  
5 When the case manager clients and translator could  
6 meet to do an MG intake."

7 Q. Okay. That's fine, I just asked for the  
8 first sentence.

9 A. Sorry.

10 Q. So Faisa's two oldest children elected not  
11 to attend school; is that correct?

12 A. Correct.

13 Q. Is that a choice that they're free to make?

14 A. Yes.

15 Q. Now, if you could turn to the next page  
16 which is 12, Issa 12 at the bottom and if you could  
17 look at the 9/11, 2015 entry, second paragraph on that  
18 page last sentence. Could you read -- well, first of  
19 all what kind of -- what was going on for this entry,  
20 what's it documenting?

21 A. It's documenting the intake, so that would  
22 be when the family would've come to the resettlement  
23 agency and they would've gone through all of the  
24 paperwork, reviewed what the services were and what  
25 not.

1 Q. Okay. Now, the last sentence of that first  
2 full paragraph on this page says Ahmed and I'm going  
3 to read it and ask you if I read it correctly.

4 "Ahmed and 17-year old Qasin are eager to  
5 start school as soon as possible, but expressed  
6 anxiety about language barrier and transportation to  
7 school. CW assured them that the school district has  
8 resources to help them adjust quickly and they seemed  
9 happy." Did I read that accurately?

10 A. Yes.

11 Q. Okay. And there's an acronym in there, CW,  
12 what does that mean?

13 A. Case worker.

14 Q. Below that it says that "clients told CW  
15 that they were unsure how some appliances worked," and  
16 that the case worker walked them through how to use  
17 the oven, and how to lock the upstairs doors.

18 Is that unusual for the folks that come over  
19 to not know how an oven works?

20 A. No.

21 Q. Okay. If you could turn to page -- Issa 14  
22 at the bottom, direct your attention to the 10/19,  
23 2015 entry near the bottom and what's it say in the  
24 fourth column over?

25 A. School enrollment appointment made.

1 Q. Okay. And it indicates there that the case  
2 manager made an appointment to enroll the three  
3 youngest children, one of them being Qasin; is that  
4 correct?

5 A. Correct.

6 Q. And then it says "appointment was made for  
7 after client received their vaccinations." And  
8 apparently that was for 10/23, 2015; is that correct?

9 A. Yes.

10 Q. Okay. So do students need to have  
11 vaccinations before they can be enrolled?

12 A. Yes. All vaccinations need to be up to  
13 date.

14 Q. So is that an indication to you that Qasin  
15 did not, at that date, have his vaccinations?

16 A. Yes.

17 Q. If you'll turn to the next page Issa 15 on  
18 the bottom. And I'll direct you to the 10/23, 2015  
19 entry which again says "school enrollment  
20 appointment."

21 A. Uh-huh.

22 Q. I don't necessarily want you to read it out  
23 loud, but tell us what happened on 10/23 according to  
24 these notes?

25 A. The case manager took Qasin and Ahmed to



1 enroll them at school.

2 Q. Okay. Let me stop you, who's Ahmed?

3 A. Qasin's younger brother.

4 Q. Younger brother.

5 A. Yes.

6 Q. Okay.

7 A. Miriam decided that she did not want to  
8 enroll in school and said she wants to work.

9 Q. And who is Miriam?

10 A. Her older sister.

11 Q. Do you know how old she is or was then?

12 A. I don't remember.

13 Q. But she's older than Qasin?

14 A. Yes. "Enrollment application was completed  
15 for both Qasin and Ahmed, however, they still needed  
16 additional vaccinations. Water Street Clinic was out  
17 of stock of the vaccinations that the clients needed.  
18 Case manager requested another medical appointment for  
19 the clients to get additional vaccinations. Qasin was  
20 given an appointment for 11/9/15 and Ahmed was given  
21 an appointment for 11/10/15."

22 Q. So as of this date, Qasin did not -- still  
23 did not apparently all the vaccinations he needed; is  
24 that right?

25 A. Correct.

1 Q. And if you'd look at the last entry on page  
2 Issa 15 from 11/9, 2015, what does that tell you?

3 A. That the case manager took Qasin to get his  
4 vaccinations.

5 Q. Okay. And where would she have taken the  
6 kids to get those vaccinations?

7 A. There are various clinics that serve the  
8 refugees. So it would've been either the Water Street  
9 Clinic where he got the appointment.

10 Q. So it's a health or a medical facility?

11 A. Yes.

12 Q. Okay. If you could turn to the next page,  
13 Issa 16. Direct your attention to the second row,  
14 which is 11/10, 2015.

15 A. Okay.

16 Q. It says, "Case manager took both Ahmed's and  
17 Qasin's vaccination records to the school enrollment  
18 office. The school enrollment told case manager that  
19 clients are still not able to begin school because  
20 they are still missing vaccinations."

21 Did I read that correctly?

22 A. Yes.

23 Q. What's your understanding, what's going on  
24 there, do you know?

25 A. It seems as though there may have been some

1 discrepancies as to whether or not he had the  
2 vaccinations.

3 Q. If you could read to yourself the next row  
4 note and then tell us if that sort of elaborates on  
5 what's going on here.

6 A. That Qasin had, in fact, had the  
7 vaccinations after conferring with the doctor.

8 Q. And if you could read that second paragraph  
9 under that 11/13 entry please.

10 A. "Plans and vaccination records were taken to  
11 the school enrollment office. CM was informed that  
12 client will be attending high school, but before he  
13 can start classes, he has to meet with Mr. Blackman,  
14 the ESL coordinator. The next available appointment  
15 is 12/10/15."

16 Q. So is it your understanding that he's now --  
17 that Qasin is now enrolled in school?

18 A. That he's presented everything that was  
19 necessary to do so, yes.

20 Q. But they're still not letting him attend  
21 school.

22 A. Correct.

23 Q. And he has to meet with somebody named Mr.  
24 Blackman.

25 A. Yes.

1 Q. Do you know who Mr. Blackman is?

2 A. Yes.

3 Q. Who is he?

4 A. An individual from the school district that  
5 I've met several times who meets with refugees to  
6 determine their eligibility for enrollment.

7 Q. And then it says the next available  
8 appointment is 12/10, 2015.

9 A. Correct.

10 Q. And what date is this that they're telling  
11 him he's got to wait until December 10th?

12 A. November 13th, 2015.

13 Q. So that's almost a month.

14 A. Correct.

15 Q. If you could turn to the next page, Issa 17  
16 at the bottom, direct your attention to entry for --  
17 the first entry for 12/1, 2015. It says "Ahmed starts  
18 school;" is that right?

19 A. Yes.

20 Q. And Ahmed is Qasin's younger brother?

21 A. Yes.

22 Q. Okay. And so it -- and they've -- they were  
23 -- the attempted enrollment was going parallel for the  
24 two of them; is that right?

25 A. Correct.

1 Q. Do you know what school Ahmed was going to?

2 A. It was a middle school, I don't remember the  
3 name.

4 Q. So he's quite a bit younger.

5 A. Yes.

6 Q. And it says everything went well for him at  
7 school.

8 A. Yes.

9 Q. So the case worker had checked on how the  
10 first day of school --

11 A. Yes.

12 Q. -- went with the client?

13 A. Yes. Generally they'd even walk them to  
14 school.

15 Q. Now, if you could go down four rows from  
16 that to the 12/11, 2015 entry where the fourth column  
17 says "Qasin's school enrollment." Could you read what  
18 it says there?

19 A. "Case manager met with client, the client's  
20 son Qasin, and the school district. The School  
21 District of Lancaster denied school to Qasin because  
22 of his age. Qasin and case manager will look into  
23 their other options of ESL program and employment."

24 Q. And do you know whether that meeting  
25 occurred on December 11th or it may have been December

1 10th?

2 A. It may have been, that's when the entry was  
3 made.

4 Q. You don't know?

5 A. No.

6 Q. If I could direct your attention to Exhibit  
7 53 in the binder in front of you. Do you recognize  
8 this document?

9 A. Yes.

10 Q. Take a minute. It appears to be two pages.  
11 And what is this?

12 A. It seems to be the e-mail where one of our  
13 staff members was discussing arranging a conference  
14 call to discuss Qasin's enrollment.

15 Q. And you're cc'd on that top e-mail.

16 A. Yes.

17 Q. And what's the date of that top e-mail?

18 A. December 17th.

19 Q. Now, I want to go over this, but I want to -  
20 - does it appear that the chronologically first e-mail  
21 is the one at the bottom?

22 A. I believe so.

23 Q. Okay. So that one was sent at -- the one  
24 from Purcell (ph) to Hilt at 11:37.

25 A. Yes.

1 Q. And the top one was sent -- was a reply at  
2 12:07, same day.

3 A. Yes.

4 Q. Okay. So who is Timothy Purcell?

5 A. He was one of the case managers in the  
6 employment program.

7 Q. Okay. At Lutheran Refugee Services.

8 A. Yes.

9 Q. Okay. And who's he writing to here  
10 directly?

11 A. Amber Hilt.

12 Q. And who is Amber Hilt?

13 A. I believe she's head of ESL for the  
14 district.

15 Q. And the first sentence says "thanks for  
16 texting me back," apparently there had been some texts  
17 exchanged.

18 A. Apparently.

19 Q. Are you familiar with what that was?

20 A. No.

21 Q. And in that second sentence it talks about  
22 there's a situation because of county assistance  
23 involving our client, Qasin Hassan; is that right?

24 A. Yes.

25 Q. Okay. And what's the -- do you know what

1 the issue is with county assistance office?

2 A. So Faisa would've been under TANF and if her  
3 school age children are not enrolled, that would  
4 affect her benefits.

5 Q. Okay. Now, if you could read that next  
6 paragraph in that e-mail please.

7 A. "As usual, we tried to enroll him in SDOL,  
8 but he was denied enrollment because he is 17 with no  
9 educational background in his home country. In the  
10 past, we have had other clients that have been able to  
11 still start with those lapses in education. The case  
12 worker was told that the client can be referred to ESL  
13 at the Literacy Council, because he would not be able  
14 to complete classes with SDOL."

15 Q. And then what's the next sentence there say?

16 A. "If we could get guidance on this case, that  
17 would be so appreciated. I have a feeling this is  
18 right around the time of your transition into the new  
19 position, so I don't know how much you know about it.  
20 Thanks for taking the time to talk to us."

21 Q. Now, in that previous paragraph after it  
22 says that he was -- Qasin was denied enrollment, that  
23 he was referred to ESL at the Literacy Council. What  
24 is that?

25 A. The Literacy Council is a facility nearby



1 where our refugee resettlement agency was, and they  
2 offer ESL classes to the community.

3 Q. And is Literacy Council part of the school  
4 district?

5 A. No.

6 Q. Is it a private non-profit, if you know?

7 A. It is a non-profit, but I don't know if  
8 there's any funding streams that came from the same.

9 Q. But it's not part of the school district.

10 A. No.

11 Q. And do you know if there's an age  
12 requirement in order to take classes at the Literacy  
13 Council?

14 A. I believe there is.

15 Q. And what's that age?

16 A. I think it's 18, but I'm not 100 percent.

17 Q. And how old was Qasin at this time?

18 A. He was not 18.

19 Q. And then the top e-mail in this exhibit is  
20 from Amber Hilt responding to Tim Purcell; is that  
21 right?

22 A. Yes.

23 Q. And she says she'll discuss it and get back  
24 to him Monday at the latest.

25 A. Yes.

1 Q. Right, okay. Now, if you could turn to  
2 Exhibit 54 in the binder, please.

3 A. Sorry, but I did turn to 54 and there's  
4 nothing there.

5 Q. There's nothing --

6 A. No.

7 Q. -- under 54?

8 A. No.

9 MR. WALCZAK: Do you have Exhibit 54?

10 MS. O'DONNELL: I have documents Bates  
11 stamped 22, 23, 24.

12 MR. WALCZAK: Yeah.

13 THE COURT: Do you want to let her use  
14 mine?

15 MR. WALCZAK: Do you have --

16 THE COURT: I do. Oh, it's fine.

17 UNIDENTIFIED: Looking at the back of -  
18 -

19 THE COURT: I've already it, so it's  
20 fine.

21 MR. WALCZAK: So 22, 23, 24. Ah, okay.

22 THE COURT: Got it?

23 MR. WALCZAK: Yes.

24 BY MR. WALCZAK:

25 Q. So this is marked as Exhibit 52, and just to

1 confirm that we're on the same page. At the bottom it  
2 should say Issa 22, 23 and 24; is that right?

3 THE COURT: Counsel, I think you  
4 misspoke, you said 52, but this is marked as 54.

5 MR. WALCZAK: I'm sorry, my apologies,  
6 54.

7 BY MR. WALCZAK:

8 Q. And does -- I'm sorry, Ms. Chesson, is it  
9 22, 23, 24 at the bottom?

10 A. Yes.

11 Q. Okay. The -- do you recognize this  
12 document?

13 A. Yes.

14 Q. Okay. And this is an e-mail trail  
15 apparently, yes?

16 A. Yes.

17 Q. And the top e-mail there on the page is  
18 simply saying this is providing contact information  
19 for Amber Hilt; is that right?

20 A. Yes.

21 Q. And who is Balahl Altiemy (ph) at the top of  
22 the page there?

23 A. He is an R&P case manager as well with or  
24 was with Lutheran Refugee Services.

25 Q. So both Megan and Balahl worked for Lutheran

1 Services.

2 A. Yes.

3 Q. And they're both case managers.

4 A. Yes, they were.

5 Q. Okay. If you could go to Issa 23 and look  
6 at the bottom there. And there is an e-mail from  
7 Amber Hilt dated December 30th to Tim Purcell; is that  
8 correct?

9 A. Yes.

10 Q. And then if you could go to Issa 24, the  
11 next page. And so Ms. Hilt is writing to Mr. Purcell  
12 saying, "We are willing to work with LRS and the COA  
13 to choose the best path for this young man." Did I  
14 read that correctly?

15 A. Yes.

16 Q. What is COA?

17 A. County Assistance Office.

18 Q. And then she asks for availability on a  
19 meeting; is that correct?

20 A. Yes.

21 Q. Okay. And so is this a continuation of the  
22 e-mail exchange that we had looked at under Exhibit  
23 53?

24 A. Yes.

25 Q. Now, back to Issa 23, there's a response

1 from Mr. Purcell to Ms. Hilt. Do you see that at  
2 9:42?

3 A. Yes.

4 Q. And you're cc'd on that?

5 A. Yes.

6 Q. Now, if you could look at the third  
7 paragraph after it says Amber. If you could read that  
8 third paragraph, please. It starts "in talking".

9 A. Okay. Just read that whole paragraph?

10 Q. If you could read it out loud.

11 A. "In talking with resettlement case worker,"  
12 and I believe that was probably "I'm talking with  
13 resettlement case worker, and they stated that the  
14 Literacy Council option would not -- would count as  
15 school, although this is an option, I just got off the  
16 phone with Megan and she said that she recently talked  
17 to Qasin and he stated he does not wants to go to  
18 school at SDOL."

19 Q. Did it says does not or did you read that --

20 A. He does, sorry. Yes. "He does want to go  
21 to school at SDOL, but if that is no longer an option,  
22 he would like to look into something else."

23 Q. Okay. But it says that as of this date,  
24 December 30th, Qasin does want to go to school.

25 A. Yes, does, I misspoke.

1 MS. O'DONNELL: Your Honor, I'd like to  
2 object to the witness reading it. I believe she  
3 testified that the first sentence reads, "In talking  
4 with the resettlement case worker, and they stated  
5 that -- pardon me, Literacy Council would not count as  
6 school." I believe she read it that way.

7 THE WITNESS: Well, it says would  
8 count, so if I did say it that way, then that's what  
9 it is, wound count.

10 THE COURT: Thank you very much,  
11 Counselor, and you may proceed.

12 BY MR. WALCZAK:

13 Q. And if you could turn to the bottom of Issa  
14 22, again as part of Exhibit 54, and this appears to  
15 be a response from Amber Hilt to Mr. Purcell on that  
16 same day; is that right?

17 A. Yes.

18 Q. And she says that she and Mr. Blackman won't  
19 be back to work until the 4th and suggests a meeting  
20 on that day; is that right?

21 A. Yes.

22 Q. And then there's a couple of other e-mails  
23 back on 22 where they're working on setting a time to  
24 meet; is that right?

25 A. Correct.

1 Q. Now, did you attend a meeting involving  
2 Qasin with school district officials on January 4th,  
3 2016?

4 A. Yes, it was a conference call.

5 Q. So this was done over the telephone?

6 A. Yes.

7 Q. And who was part of that call?

8 A. Myself, Megan Brown, Timothy Purcell, Amber  
9 Hilt and Jack Blackman.

10 Q. Okay. So Ms. Hilt and Mr. Blackman are the  
11 two school district officials; is that right?

12 A. Yes.

13 Q. Okay. And this was again to discuss what  
14 was going to happen with Qasin.

15 A. Correct.

16 Q. And what was -- do you recall what the  
17 school district's position as articulated by Ms. Hilt  
18 or Mr. Blackman was?

19 A. That Qasin should attend ESL at the Literacy  
20 Council or pursue a GED or seek employment.

21 Q. Okay. So Ms. Hilt stated that she did not  
22 want Qasin coming to the school.

23 A. She and --

24 MS. O'DONNELL: Objection, calls for  
25 speculation.

1 THE COURT: Sustained.

2 BY MR. WALCZAK:

3 Q. What do you recall Ms. Hilt saying about  
4 Qasin's attendance at school?

5 A. I remember that Ms. Hilt and Jack Blackman  
6 discussed whether or not he seemed interested enough  
7 to even go to school, and this would represent a big  
8 commitment and would take a lot of time, and that his  
9 body language and demeanor didn't appear to  
10 demonstrate that he was eager to go to school or  
11 interested.

12 Q. When she said his body language didn't  
13 suggest that he wanted to go to school, what was she  
14 referring to, do you know?

15 A. She was referring probably to that initial  
16 meeting with Jack Blackman.

17 Q. So there was a meeting on December 10th as  
18 you had testified earlier; is that right?

19 A. Correct.

20 Q. And Qasin had attended that meeting.

21 A. Correct.

22 Q. And so -- and now she's saying that he  
23 didn't seem interested because of his body demeanor;  
24 is that right?

25 A. Body language --



1 MS. O'DONNELL: Objection.

2 THE WITNESS: Body language, yes.

3 THE COURT: There's no objection,  
4 correct, Counsel?

5 MS. O'DONNELL: That's correct, the  
6 witness corrected herself.

7 THE COURT: Thank you, you may proceed.

8 BY MR. WALCZAK:

9 Q. And so what was your understanding from what  
10 the district officials were saying about why they were  
11 refusing to enroll Qasin?

12 A. They stated he didn't -- he was too old, he  
13 didn't have enough credits and wouldn't be able to  
14 graduate on time and was a drop-out risk, that his  
15 body language of him and his mother didn't seem like  
16 it was something they wanted to go to school or  
17 anything.

18 Q. And did you respond to those arguments?

19 A. Yes.

20 Q. And what was your response?

21 A. I responded by explaining everything that  
22 goes on when a refugee comes, and that that would not  
23 necessarily mean that this individual does not want to  
24 attend school. That perhaps there are other factors,  
25 cultural barriers, communication barriers, or even

1 gender or religious barriers that would cause an  
2 individual to make various facial expressions, and  
3 that should not be a determinate for going to school.

4 Q. Okay. And so -- and you were responding to  
5 the claim about body language or demeanor?

6 A. Yes.

7 Q. And was there some discussion about language  
8 acquisition and whether there were other factors  
9 involved in education?

10 A. They suggested that he could go to the  
11 Literacy Council. I suggested that he would get a  
12 more holistic education if he went to high school, and  
13 there was a big difference between just going to take  
14 ESL classes and going for a high school degree.

15 Q. Okay. And was there a discussion about  
16 whether it would be better for Qasin to get a job or  
17 go to school?

18 A. They suggested employment as in other  
19 meetings, and I suggested that we all know that  
20 already to get a job without the cultural and language  
21 barriers, it's difficult without a high school degree,  
22 and that it's important for them to have a high school  
23 degree to be able to even get a job.

24 Q. And was it determined on that call whether  
25 or not Qasin would be allowed to go to school?

1           A.    I don't recall if it was determined on that  
2 call or in the couple of e-mails afterwards, but at  
3 some point shortly after it was determined that he  
4 would go to Phoenix.

5           Q.    Was there any discussion at this time about  
6 McCaskey?

7           A.    Not that I recall.

8           Q.    And do you know when Qasin actually started?

9           A.    It would've been shortly after that, but I  
10 don't remember what the date is.

11          Q.    After this exchange with the district about  
12 Qasin, did you take any action to learn more about --  
13 for district practices and Phoenix?

14          A.    Yes, I did visit the school district's  
15 website to visit -- to learn more about enrollment  
16 policies and what not.

17          Q.    Okay. Did you have discussions with your  
18 colleagues at Lutheran Services?

19          A.    Yes, we did have internal discussions  
20 regarding this.

21          Q.    And as a result of those discussions, what  
22 did you learn about your agency's experiences with the  
23 school district?

24          A.    That the experience that Qasin went through  
25 was a similar pattern that other refugees had

1 experienced.

2 Q. Okay. And what were some of those patterns  
3 that you discovered?

4 A. Delays in enrollment, enrollment denials and  
5 sending students to Phoenix Academy.

6 Q. And did you learn anything about what  
7 happened if the school district denied somebody  
8 enrollment? Did they sometimes change that position?

9 A. I believe in Qasin's instance they did  
10 change that, but I don't know.

11 Q. When you did on line research, you said you  
12 looked at the district's website. Did you do any  
13 investigation of try to investigate what the law was  
14 on this issue?

15 A. Yes.

16 Q. Okay. And are you a lawyer?

17 A. No.

18 Q. And do you recall what websites you might  
19 have visited?

20 A. The Education Law Center was one of them.

21 Q. Okay. Did you visit any government agency  
22 websites?

23 A. At one point in time in -- during my  
24 advocacy I did.

25 Q. Did you look at United States Department of

1 Education?

2 A. Yes.

3 Q. And did you look at Pennsylvania Department  
4 of Education?

5 A. Yes.

6 Q. Okay. What did you learn about some of the  
7 law on some of the concerns you had about school  
8 district enrollment practices?

9 A. That all students up to the age of 21 should  
10 have access to public education, that would be one of  
11 the things that I learned. What is necessary to  
12 enroll a student, and the time frame that enrollment  
13 should occur within. What rights ESL, ELL learners  
14 have, things like that.

15 Q. And did you learn from your colleagues that  
16 many of these things were not always being done by  
17 school district officials?

18 A. Yes.

19 Q. And was this -- were these problems  
20 reflected in Qasin's case?

21 A. Yes.

22 Q. By this time, had you acquired another case  
23 raising similar problems?

24 A. Yes, Khadidja Issa.

25 Q. Okay. We're going to go to day one binder

1 now, I think it's --

2 THE COURT: Ma'am, do you have that  
3 before you? Do you have the day one binder?

4 THE WITNESS: No, I just have the day  
5 two binder.

6 MR. ROTHSCHILD: You have day one or  
7 day two?

8 THE WITNESS: Day two.

9 MR. WALCZAK: I'm sorry, Your Honor,  
10 I've just pulled out --

11 MR. ROTHSCHILD: Oh, here.

12 (Pause)

13 THE COURT: Let the record reflect the  
14 witness has been handed what is the day one binder; is  
15 that correct?

16 MR. WALCZAK: I have -- I'm sorry, Your  
17 Honor, I've handed the witness what was discussed  
18 yesterday, which is the day one exhibit binder.

19 THE COURT: Thank you very much.

20 MR. WALCZAK: Which has the 1 through  
21 something exhibits in there.

22 BY MR. WALCZAK:

23 Q. If you could open to Exhibit 40. Do you  
24 recognize this? Oh, I'm sorry.

25 THE COURT: That's in the second binder

1 for day one.

2 MR. WALCZAK: Sorry?

3 THE COURT: That's in the second day  
4 one binder.

5 MR. WALCZAK: Second day.

6 MR. ROTHSCHILD: I think only Your  
7 Honor has a second day one binder so --

8 THE COURT: Excuse me, thank you.

9 BY MR. WALCZAK:

10 Q. Are you there?

11 A. I'm on an e-mail from Balahl.

12 Q. Okay. At the bottom it should say Issa 40.

13 A. Yes.

14 Q. Okay. 8/9/16.

15 A. Yes.

16 Q. And do you recognize these e-mails?

17 A. Yes.

18 Q. If you could turn to the bottom of the  
19 second page it says there's a little 7 at the bottom.  
20 Do you see that or actually never mind. There's a --

21 A. 2?

22 Q. -- 2. Right. And there's an e-mail from  
23 Balahl dated January 21.

24 A. Yes.

25 Q. What is -- who's that to?

1 MS. O'DONNELL: I'm going to object to  
2 the testimony on this exhibit. Apparently it doesn't  
3 appear that Ms. Chesson has been copied on it.

4 THE COURT: Mr. Walczak?

5 MR. WALCZAK: Ms. Chesson has viewed  
6 this exhibit and is familiar with it. Well, let me  
7 lay a foundation with her.

8 THE COURT: Very well, I'll allow you  
9 to lay the foundation.

10 MR. WALCZAK: Okay. Thank you.

11 BY MR. WALCZAK:

12 Q. Have you seen these e-mails before?

13 A. Yes.

14 Q. Okay. Who is Khadidja Issa?

15 A. She was one of Lutheran Refugee Service  
16 clients, a refugee who came to Lancaster.

17 Q. And how did she come to your attention in  
18 your position at Lutheran Services?

19 A. Her mother was one of my clients.

20 Q. Okay. And why was she now your client?

21 A. She was a -- had gone through R&P 90-day  
22 phase and was a TANF client.

23 Q. And was there a concern also with her not  
24 being able to connect -- collect her TANF benefits?

25 A. Yes. There were some exchanges between



1 county's assistance and Lutheran Refugee Services.

2 Q. And Khadidja was -- is a daughter of the  
3 mother?

4 A. Yes, Mariam.

5 Q. Okay. So did you begin advocating on behalf  
6 of Khadidja?

7 A. Yes.

8 Q. And did you review this -- did you see this  
9 e-mail at or about the time it was sent?

10 A. Yes.

11 Q. And was that important for your preparation  
12 to advocate for Khadidja?

13 A. Yes.

14 Q. If you will look at that bottom e-mail,  
15 well, at the bottom of the second page of the exhibit,  
16 this is an e-mail from Balahl to Amber Hilt; is that  
17 right?

18 A. I -- on page 2 I have the beginning of his  
19 e-mail and then the following one has the rest of it.

20 Q. Okay. If you could read the paragraph at  
21 the top of the third page.

22 A. "I have an 18-years old client which was  
23 interviewed by Mr. Blackman, and she was not able to  
24 get to high school due to her language efficiency, so  
25 the question is, can we enroll her to Fonix (sic)"

1 which means Phoenix Academy, "the same way we get the  
2 other client testing."

3 Q. Now, the English maybe is not perfect here.  
4 Where is Balahl from, do you know?

5 A. Iraq.

6 Q. And is he a former refugee, do you know?

7 A. Yes. Well, came through special status, I  
8 believe he interpreted for the Army overseas, so.

9 Q. Okay. And subsequently at some point became  
10 a case worker for Lutheran Services?

11 A. Yes.

12 Q. So it says -- talking about "was not able to  
13 get to high school due to language efficiency." Is  
14 that correct?

15 A. Yes.

16 Q. So in your understanding, was she denied,  
17 was Khadidja initially denied enrollment?

18 A. Yes.

19 Q. And Balahl is asking if she could go to  
20 Fonics or Phoenix Academy.

21 A. Yes.

22 Q. And then it says the same way as another  
23 client, Al Kasim (ph), who's he referring to there?

24 MS. O'DONNELL: Your Honor, again my  
25 objection. He's having the witness testify to the

1 exhibit that he just instructed her (indiscernible).

2 THE COURT: I certainly would not  
3 permit counsel to simply call someone to parrot what's  
4 written there just to read it for the benefit of the  
5 Court, even though I do believe these documents are  
6 ultimately going to be relevant. However, the  
7 foundation while not very strong, is that this  
8 particular witness, I don't know if you exactly said  
9 this, ma'am, but you relied upon these documents in  
10 doing your job with respect to this child who you also  
11 were a case manager for.

12 THE WITNESS: Yes.

13 THE COURT: Based on that, based on the  
14 fact that they're going to come in any case, that  
15 you're not simply having her to read it for the sake  
16 of reading it, I'm going to overrule the objection  
17 with the understanding that once it goes beyond that,  
18 you'll cease doing that. In other words, if there are  
19 not document she has not relied on and was not part of  
20 her case, she won't be allowed to get the documents in  
21 by reading them.

22 MR. WALCZAK: Right. It is her case.

23 THE COURT: Understood.

24 MR. WALCZAK: Right.

25 THE COURT: And that's why I'm allowing

1 her to read these.

2 BY MR. WALCZAK:

3 Q. If you could go back to the second page now  
4 of this exhibit. There's a response from Ms. Hilt on  
5 January 21st to Balahl; is that right?

6 A. Yes.

7 Q. And she asks three questions. Without  
8 reading the e-mail, what are the three things that Ms.  
9 Hilt is asking for in relation to Khadidja?

10 A. Asking clarification on enrollment  
11 terminology, and information on the client, and then  
12 discussions about Mr. Blackman and meeting.

13 Q. What was the -- what pathway Mr. Blackman  
14 had presented to Khadidja, clarification on that; is  
15 that right, on the third one?

16 A. Yes.

17 Q. Now, if you could go to the first page,  
18 there's a response e-mail that same day from Balahl to  
19 Amber Hilt, and does it appear that Balahl was trying  
20 to answer Ms. Hilt's questions there?

21 A. Yes.

22 Q. And would those be found at the end of --  
23 did he just kind of write them in at the end of her  
24 question in each of those three paragraphs?

25 A. Yes, it appears so.

1 Q. Let's look at the first paragraph. So when  
2 does Balahl say that Khadidja's immunization records  
3 were sent to -- were given to Lancaster Schools?

4 A. If you'll forgive me, it appears as though  
5 part of this is a repeat, but I'm not sure if I'm just  
6 not looking at the right place.

7 Q. At the -- if you see -- do you see the  
8 question -- well, let me tell you. Look -- if you  
9 look at page 2 at the Amber Hilt to Balahl e-mail. In  
10 the middle of the page, do you see question 1?

11 A. Yes.

12 Q. Okay. And then if you look at question 1 on  
13 the first page, there's something added after the  
14 question mark. Do you see that?

15 A. Yes, although this copy is a bit -- very  
16 pale, but yes, I do see it.

17 Q. Okay. And can you tell what he says there?

18 A. "We provided her info and immunization  
19 record to School District of Lancaster as November  
20 16."

21

22 Q. And the next paragraph where Ms. Hilt,  
23 number 2, where Ms. Hilt had asked for the full name  
24 of the client, he simply wrote, Khadidja Issa.

25 A. Issa, Khadidja, yes.

1 Q. And then on the last paragraph, can you tell  
2 what the response was there?

3 A. That his concern was that another client  
4 with the same situation who had been denied was  
5 enrolled to Phoenix Academy and we have not received  
6 any actual referrals from SDL.

7 Q. And does -- before that, does it say that  
8 the pathway, that Mr. Blackman had suggested, referred  
9 her to GED classes?

10 A. Some of the -- this printed copy is not  
11 there, but yes. Her client with same situation, but  
12 he was able to enroll at Fonics Academy (sic), the  
13 pathway referring her to GED classes. But till now,  
14 we have not received any actual referrals from SDL.

15 Q. Okay. And if you will now turn to the top  
16 e-mail on Exhibit 40, that's a response to -- from  
17 Amber Hilt to Balahl's -- the information he provided  
18 her; is that right?

19 A. Yes.

20 Q. And in the first paragraph does it say that  
21 the -- that the referral actually was what Mr.  
22 Blackman had suggested? If you could read that to  
23 yourself, please.

24 A. Yes, that the meeting was the actual  
25 referral.

1 Q. And what's your understanding of what that  
2 referral was?

3 A. For -- we're speaking of Khadidja, so that  
4 he evaluated her and determined that she would not be  
5 enrolled in the school district.

6 Q. And then if you look at that last paragraph  
7 in the -- or the second to last paragraph from Ms.  
8 Hilt, does she distinguish Qasin's situation from  
9 Khadidja?

10 A. "The other clients you're speaking about is  
11 not the same situation," so yes.

12 (Pause)

13 Q. Okay. If you could look at Issa -- at the  
14 Exhibit 16 in your binder.

15 THE COURT: And that is the day one  
16 binder?

17 MR. WALCZAK: Yes. I'm not sure if  
18 it's 1 of 2 of your binders, Your Honor. Binder 1.

19 THE COURT: Thank you.

20 BY MR. WALCZAK:

21 Q. Do you recognize what's marked as Issa  
22 Exhibit 16?

23 A. Yes.

24 Q. And what is it?

25 A. It's an e-mail from Mr. Blackman to Balahl.

1 Q. And what does it say?

2 A. "This guy is nuts, make me say no all the  
3 time, makes me say no all the time. Decisions are  
4 made on a case-by-case basis."

5 Q. And what's the date of --

6 MS. O'DONNELL: And I'm going to object  
7 to the introduction of this or the testimony on this  
8 exhibit. This witness has not been copied on it, and  
9 we haven't established that she used for the purposes  
10 of her case review or anything else.

11 THE COURT: Yeah, my understanding that  
12 is there's a stipulation that all of these documents  
13 are authentic and there's no hearsay objection. In  
14 other words, it's been stipulated that they are  
15 business records and they are admissible,  
16 notwithstanding the hearsay concerns. I do recognize  
17 the legitimacy of your argument, though. I think the  
18 only way this witness would be talking about this  
19 document is if in her capacity as the case manager for  
20 Issa Khadidja, she was utilizing this document, saw  
21 this document was part of her file, part of her  
22 record. I guess would be appropriate again to lay a  
23 foundation as we get into more of these documents.

24 MR. WALCZAK: Your Honor, it's -- well,  
25 I'll ask the -- I'll have the witness testify.



1 BY MR. WALCZAK:

2 Q. Did you see this document at or about the  
3 time it was sent?

4 A. Yes, multiple people also sent it to me as  
5 well at that same time.

6 Q. And was this -- did this document become the  
7 source of a discussion with the school district?

8 A. Yes, it did.

9 Q. Was it specifically discussed at a meeting  
10 with the school district?

11 A. Yes, it was.

12 Q. Okay. Before we get to that meeting, what  
13 was the reaction in your agency when you saw this e-  
14 mail?

15 A. At many levels, it was shock and my director  
16 was very displeased with this kind of communication  
17 from a community partner.

18 Q. Okay. And --

19 THE COURT: Who is the guy that is  
20 nuts? Are they talking about, or is Mr. Blackman  
21 talking about Balahl?

22 THE WITNESS: Yes.

23 MR. WALCZAK: What's -- I'll ask the  
24 witness what they're understanding.

25 THE COURT: Okay.

1 BY MR. WALCZAK:

2 Q. So this is an e-mail from -- January 21st,  
3 3:30 e-mail from Jack Blackman to Balahl.

4 A. Yes.

5 Q. And the subject is Khadidja Issa, correct?

6 A. Yes.

7 Q. Okay. What was your understanding of what  
8 this e-mail was, what happened here?

9 MS. O'DONNELL: I'm going to object  
10 based on speculation.

11 THE COURT: I'm going to overrule that  
12 objection because I -- this is developing, it appears  
13 that this witness was very actively involved in the  
14 efforts to get this child enrolled in the school, so  
15 she would've been integral to all the communications  
16 back and forth between the school and both Balahl and  
17 the resettlement agents, so you may ask the question.

18 BY MR. WALCZAK:

19 Q. What was the understanding at your agency  
20 about what this e-mail was or how you got it?

21 A. The e-mail was understood as a mistaken  
22 communication to Balahl after we were trying to  
23 advocate for Khadidja Issa's placement in the School  
24 District of Lancaster.

25 Q. Okay. And so do you look at the e-mail

1 below the one where Mr. Blackman says, "this guy is  
2 nuts," is that in fact, a part of the e-mail strand  
3 that we had just looked at?

4 A. Yes.

5 Q. So is your belief at the agency that this  
6 was inadvertently sent?

7 A. Correct.

8 Q. Okay. What was the understanding at your  
9 agency about who Mr. Blackman is referring to in this  
10 guy is nuts?

11 A. Balahl.

12 THE COURT: So the speculation here is  
13 that he meant to send this perhaps to Ms. Hilt or  
14 someone else, but that is speculation. Whether  
15 that'll be supported ultimately, but I understand.

16 Q. That was, in fact, the understanding of you  
17 and folks at your agency that this was a mistakenly  
18 sent e-mail.

19 A. Yes, and it was brought up by our agency to  
20 the school district as well.

21 Q. Okay. And you said that your agency was  
22 upset. Why was the agency upset about this?

23 A. For several reasons, but just on a basic  
24 level, if you are dealing with community partners, and  
25 you have to maintain relationships and communication,

1 this kind of level of what we perceived was  
2 disrespectful, doesn't -- is not conducive to positive  
3 community relationships.

4 Q. Okay. Was there any concern about whether  
5 this reflected on decision-making by the district?

6 A. Yes, that was our secondary concern, because  
7 we were trying to figure out why Khadidja was being  
8 denied, especially after Qasin had finally been  
9 enrolled, and we were trying to determine what the  
10 reasoning would be, and this led us to believe that it  
11 was perhaps decisions were made on a personal basis,  
12 and that's why we brought it up to the school district  
13 and at a meeting with the school district.

14 THE COURT: And if I may, by January  
15 21, 2016, how long had you been trying to get Khadidja  
16 into school?

17 THE WITNESS: So Balahl would have been  
18 her case manager for 90 days, and one of the first  
19 responsibilities is once all vaccinations are  
20 completed that they enroll them in school. So he  
21 would've been trying, and that would've been noted in  
22 the case file, but a couple of months.

23 THE COURT: All right. Thank you.  
24 Excuse my interruption, Counselor, you may continue.

25 BY MR. WALCZAK:

1 Q. And just to clarify the Judge's question,  
2 was there in the e-mails in Issa 40 at the bottom of  
3 the page there, it's an e-mail from Balahl to Amber  
4 Hilt responding to her questions. Do you see that?

5 A. Am I going back to --

6 Q. Yes, please, to 40.

7 A. Okay. Issa 40.

8 Q. And the first question is, can you please --  
9 from Ms. Hilt to Balahl, can you please clarify what  
10 you mean by currently enrolled, and then it says what?

11 A. SDL we provided -- we provided her info and  
12 immunization record to School District of Lancaster as  
13 of November 16th.

14 Q. Okay. And so now the e-mails that we are  
15 discussing are January 21st.

16 A. Yes.

17 Q. All right.

18 A. So a couple of months.

19 Q. Was there a meeting to discuss Khadidja's  
20 situation with the school district?

21 A. Yes, that and a few other topics.

22 Q. And do you remember when that meeting was?

23 A. It was originally scheduled for January 28th  
24 and I think they rescheduled, and I believe it was in  
25 the beginning of February.

1 Q. Do you remember whether it might have been  
2 February 11th?

3 A. Yes.

4 Q. And who was at this meeting?

5 A. My director, Madov (ph), he was the site  
6 director for Lutheran Refugee Services.

7 Q. What's Madov's last name?

8 A. Sharma (ph). Willis Orlando who is head of  
9 R&P, myself head of employment, and then also became  
10 an educational advocate, and as far as the school  
11 district, there was Dr. Abrams, Amber Hilt and Jack  
12 Blackman.

13 Q. And we've talked about Blackman and Hilt,  
14 who's Mr. Abrams or Dr. Abrams?

15 A. I believe he's head of student services, I'm  
16 not 100 percent on his role.

17 Q. Okay. Was there -- at the start of that  
18 meeting, was there a discussion about something other  
19 than Khadidja?

20 A. Yes.

21 Q. What was -- how did that meeting start off?

22 A. Well, we had several topics that we wanted  
23 to discuss. We wanted to discuss general problems  
24 with enrollment, the lack of communication. There was  
25 no clear response to a student or family when they

1 were denied, or if they were enrolled. There was no  
2 communication in their language, they acknowledged  
3 that there were some areas that they needed to work  
4 on, and were trying to formalize that process.

5 Q. Okay. Was the Blackman e-mail that had  
6 apparently inadvertently gone to Balahl, was that  
7 discussed at that meeting?

8 A. Yes.

9 Q. And what was the discussion on that?

10 A. It was a discussion, Madov the site director  
11 brought it up first of all and we all spoke on it.  
12 And it became a very heated discussion between himself  
13 and Jack Blackman. And we brought it up for the  
14 previous reasons that I mentioned and --

15 Q. And was there some resolution on that  
16 discussion?

17 A. The school district acknowledged -- well,  
18 Jack Blackman acknowledged perhaps that that was not  
19 appropriate, and they also acknowledged like what I  
20 said before, that they needed to re-evaluate some of  
21 the ways that they were enrolling students and what  
22 not.

23 Q. And was there a discussion about whether  
24 decision-making was made on a personal basis, one of  
25 the concerns you raised?

1 A. We did bring that up.

2 Q. And do you recall what the district's  
3 response was to that?

4 A. That that wasn't the case.

5 Q. So they denied that.

6 A. Correct.

7 Q. And then you talked about the discussion on  
8 enrollment denials and delays. And did you  
9 specifically discuss Qasin's situation?

10 A. Yes.

11 Q. And what do you recall about that  
12 discussion?

13 A. That we brought up that as an example, to  
14 kind of establish a recent pattern, and stated that  
15 again, students come in and all of the obstacles that  
16 they are facing within a very short period of time can  
17 be overwhelming, that there can be other family  
18 factors, community factors, language, cultural  
19 barriers that would have someone have those facial  
20 expressions, and that that's not, and what I felt or  
21 anyone at my agency, reasonable excuse to deny a  
22 student, so.

23 Q. You were saying there's cultural barriers  
24 involved there?

25 A. Correct.



1 Q. And did you discuss Khadidja's enrollment?

2 A. Yes, we did.

3 Q. And what was that discussion?

4 A. We asked what the issues were with her  
5 enrollment and we got some of the same responses that  
6 they were concerned about drop-out rates and things  
7 like that.

8 Q. Did they talk about her age?

9 A. Yes.

10 Q. Did they talk about her language  
11 proficiency?

12 A. Correct, yes, they did.

13 Q. How about limited educational credits.

14 A. Yes, they did.

15 Q. Was there anything about her likelihood of  
16 being able to graduate?

17 A. They spoke about whether or not she would be  
18 able to graduate in time. We stated that regardless  
19 of when she graduates, she has a right to access  
20 public education and she's still within that age  
21 group, so we were advocating to have her placed.

22 Q. Was there a decision made on Khadidja's  
23 enrollment at that meeting?

24 A. Yes, shortly after.

25 Q. After the meeting?

1 A. Correct.

2 Q. And what was that decision?

3 A. That they decided to finally enroll her at  
4 Phoenix Academy.

5 Q. And so this -- I'm sorry.

6 A. And that they would communicate with me when  
7 that would take place.

8 Q. So this enrollment would've occurred after  
9 this meeting on February 11th?

10 A. Correct.

11 Q. And the initial enrollment papers were filed  
12 on November 16th?

13 A. Yes.

14 Q. Was there a larger philosophical discussion  
15 at this meeting with school district officials about  
16 whether students benefit by going to school as opposed  
17 to going to work?

18 A. Yes.

19 Q. And tell -- what was the -- what were the  
20 district officials saying about that?

21 A. They focused a lot on language acquisition  
22 and that a lot of them weren't interested in school  
23 and just needed to find a job. And we discussed what  
24 the importance of an education is, that a lot of these  
25 refugees come here for a better life, and that

1 holistic approach and a high school degree can offer  
2 other avenues and open doors that would otherwise be  
3 closed to them.

4 Q. And so the district was suggesting that --  
5 when you say they should be going to work, they -- who  
6 are they referring to?

7 A. The refugees in question that we were trying  
8 to enroll.

9 Q. And you all were suggesting that your  
10 clients should go to school.

11 A. Correct. That even if employment is a goal,  
12 that an education allows you to gain more fulfilling  
13 and paying employment in the long run.

14 Q. Okay. And do you recall Dr. Abrams making  
15 any comments about enrollment of older refugees?

16 A. Yes.

17 Q. And what's your recollection?

18 A. He made a comment about refugees coming in  
19 with these bogus, and these were his words, bogus  
20 birthdates, and that caused another somewhat heated  
21 discussion between our agency and the school district.

22 Q. And do you know what he meant, or did he  
23 explain what he meant by bogus birthdays?

24 A. Birth dates of 1/1, January 1 and we  
25 explained to him what those meant and that they were

1 given by the highest authority and that when you're a  
2 refugee and you're escaping wore torn countries, that  
3 you don't have all records and documents with you.  
4 And even at that, that not all refugees have access to  
5 hospitals or countries have access to documents that  
6 would offer that. So when refugee comes in, the  
7 highest authorities give them an accurate and  
8 estimated date of birth, and that is a legal date of  
9 birth, and that's what they should go by.

10 Q. Okay. And so the date of birth by which  
11 your agency goes is the one that's assigned by the  
12 United States State Department.

13 A. Correct.

14 Q. And that's the same date that your agency  
15 would submit to the school district.

16 A. Yes.

17 Q. And that's the source of the birth date.

18 A. Yes.

19 Q. And was there any discussion about concerns  
20 the agency had in how the district communicated with  
21 students and parents?

22 A. Yes, that there was often no interpretation,  
23 that if there was any, it was often that they relied  
24 on family members or younger students who maybe had a  
25 bit more English. That results for testing enrollment

1 or any other communication were not formalized. It  
2 was, if it were lucky, we had to run after them and  
3 call them or e-mail them and get one line responses.

4 Q. Okay. So that was February 11th.

5 A. Yes.

6 Q. And at some point, was Khadidja scheduled  
7 for orientation?

8 A. They said they would give us the date, and  
9 then I still hadn't heard from them, so I wrote an e-  
10 mail and asked when that would occur and I got a one  
11 line response, that she's going to -- Khadidja is  
12 going to Phoenix Academy, orientation is February  
13 17th.

14 Q. And did you accompany Khadidja on that  
15 orientation?

16 A. Yes, I did.

17 Q. And where was that orientation?

18 A. At Phoenix Academy.

19 Q. And had you been to Phoenix before?

20 A. That was my first time.

21 Q. Okay. What was your impression of the  
22 building when you first got to Phoenix?

23 A. It seemed very stale, every level had  
24 behavior specialists, there were uniforms, I would've  
25 described it more like a detention center.

1 Q. That's obviously your description.

2 A. Correct, my personal.

3 Q. When you say behavioral specialist, what do  
4 you mean by that?

5 A. That's the title that they give them. I  
6 can't really say what they necessarily do, but what  
7 they told me that they do is make sure that -- they  
8 monitor the halls, make sure that behavior of the  
9 students is according to code, and stuff like that, so  
10 more like prison guards or something like that.

11 Q. So you went inside the building with  
12 Khadidja, was anybody else with you?

13 A. Balahl.

14 Q. Okay. Your colleague case worker?

15 A. Correct, he speaks Arabic and was going to  
16 provide interpretation.

17 Q. The school district did not have an  
18 interpreter for Khadidja?

19 A. No, we were just told to come February 17th,  
20 it was a group orientation with all others being  
21 English speakers and the person presenting wasn't  
22 really familiar with the fact that we were even  
23 coming, so it might have been a last minute decision,  
24 I don't know, but there was no interpretation.

25 Q. And how many other incoming students were

1 there, if you remember?

2 A. It was a big enough classroom with two sides  
3 of seating, and maybe half of it was full.

4 Q. So how many would you say that is?

5 A. Perhaps 15 to 20, I don't know.

6 Q. Was that orientation in any way slowed down  
7 or did it appear to be presented in an effort to allow  
8 Khadidja to understand?

9 A. No, I just asked Balahl if he could  
10 rearrange his schedule and come with me, so that  
11 Khadidja would understand everything that was being  
12 said there.

13 Q. Okay. But you understood the orientation.

14 A. Yes.

15 Q. Okay. What -- tell us what you learned at  
16 that orientation? What did they -- what were they  
17 saying?

18 A. They talked about what -- you know, the  
19 academic offerings were there, I asked a lot of  
20 questions as well throughout the presentation. They  
21 talked a lot on -- they focused a lot on behavior and  
22 what tactics a behavior specialist would use if they  
23 had to confront a student. They even asked an  
24 individual who was enrolling to Phoenix Academy to  
25 stand up, so that they could demonstrate their handle

1 with care tactics, which ultimately could result in a  
2 student being faced up against the wall with their  
3 hands behind their back, and she demonstrated that  
4 with a student who was coming in to school. So this  
5 was the first impression these students was getting.

6 Q. So who -- do you know who was conducting the  
7 orientation?

8 A. If I'm correct, it's Becky Falcon (ph).

9 Q. And do you know who she is?

10 A. I don't remember what her title is, but she  
11 had some sort of a role with student services.

12 Q. And do you know whether she was a school  
13 district or Phoenix employee?

14 A. Phoenix.

15 Q. Phoenix employee.

16 A. Yes.

17 Q. And so you said they did a demonstration.

18 A. Yes.

19 Q. Now was this a demonstration they did with  
20 one of the incoming students?

21 A. Yes.

22 Q. And can you describe in a little more detail  
23 what it is that they showed?

24 A. She talked about -- some of the language  
25 that she was using was, this is a school for last



1 resorts, this is your last chance, we don't know where  
2 you are, where you're coming from, or what you've been  
3 through, but we need to keep order in this school, and  
4 there are three levels to an interaction with the  
5 behavior specialist. First, you might be asked to go  
6 outside of the hall room -- into the hall room and  
7 cool down, and if that doesn't work, a behavior  
8 specialist will be called and they can grab you by the  
9 wrist, and if that doesn't work, they will grab you by  
10 the wrist and elbow, and if that doesn't work, they'll  
11 put your hands behind your back, and then ultimately  
12 put your face up against quote a clean wall, if that  
13 was going to make a difference, and with your hands  
14 behind your back until we wait for reinforcement.

15 Q. And as she was describing this, was she  
16 actually demonstrating this?

17 A. Yes.

18 Q. And so she grabbed a student's wrist first?

19 A. Yes, she asked for a student volunteer and  
20 then no one did, and then one student, she kind of  
21 pointed to her and asked her to come up, and she  
22 reluctantly went, but she did the demonstration with  
23 her.

24 Q. And so the last step of this she actually  
25 had the student penned up against the wall?

1           A.    I don't remember.  She did grab her arm and  
2 her wrist and her elbow, and she did put her hand  
3 behind the back, I don't remember 100 percent whether  
4 she had her up against the wall.

5           Q.    Was there -- at the outset of describing the  
6 orientation, you said they talked about the -- sorry,  
7 the curriculum, the instruction, how much discussion  
8 was there of that?

9           A.    Not much.  They said they offered general ed  
10 and I asked what -- questions like what were their  
11 ratings within the school district, what were their  
12 percentages from high school to college, what were  
13 drop-out statistics, stuff like that.  She didn't have  
14 any of that information.

15          Q.    Did they talk about -- did you ask about  
16 ESL?

17          A.    I did ask about ESL and I did go more in-  
18 depth in that conversation after the orientation, the  
19 group orientation.

20          Q.    Okay.  Let's stick with orientation.  Was  
21 there any discussion at that orientation about ESL,  
22 I'm sorry, the group orientation?

23          A.    There wasn't much discussion about it, but  
24 they did talk about ESL.

25          Q.    And what did they say?

1           A.    That they offered ESL classes to students  
2 who needed language acquisition and other things like  
3 that.

4           Q.    Anything else?

5           A.    Not much.

6           Q.    You say not much, was there anything else  
7 that you recall?

8           A.    I'm not remembering anything particularly  
9 right now.

10          Q.    Was there any discussion about homework?

11          A.    Yes.

12          Q.    And what did they say?

13          A.    That there is no homework at this school  
14 because they discuss how you can't bring anything in  
15 or out of the school, that the only exceptions would  
16 be if you got authorization because you were part of a  
17 sports team or had after school employment, and that  
18 included materials, academic supplies, nothing could  
19 be brought in or out including even feminine hygiene  
20 products, which they discussed in orientation.

21          Q.    So they specifically talked about feminine  
22 hygiene products not being able to be brought in?

23          A.    Correct.

24          Q.    And did they say there's an alternative for  
25 the girl students?

1           A.    They said that they could come and ask them  
2   for the feminine hygiene products, and that if they  
3   had a specific brand that they needed, they could come  
4   and request for authorization to bring that in.

5           Q.    In your work with refugees, is that  
6   something you found to be problematic?

7           A.    Yes.

8           Q.    Why?

9           A.    There are again cultural barriers, gender  
10   barriers, language barriers and religious barriers  
11   that would make that very uncomfortable for an  
12   individual to have to go and even ask for that.

13          Q.    Was there any discussion about how you get  
14   into the school?

15          A.    Yes.

16          Q.    And what was that discussion?

17          A.    They discussed how it's single filed pat  
18   down lines every morning, that they require you to  
19   even take off your shoes.

20          Q.    Was there any discussion about what you  
21   could or could not wear?

22          A.    No -- basically you wear uniforms.  They  
23   talked about how you first come in with a green shirt,  
24   and that your behavior is good enough, that you can  
25   upgrade to a black shirt.

1 Q. And what's your understanding of -- did they  
2 explain why they did that?

3 A. They talked about how the students who were  
4 upgraded to black shirts would become hall monitors,  
5 if you will, and would get other benefits like being  
6 able to wear earrings and stuff like that.

7 Q. And did they say anything about  
8 confrontational tactics?

9 A. Yes, that was mostly the handle with care  
10 and that type of stuff.

11 Q. And what -- so that was the -- was that the  
12 description you gave us before, about how they  
13 controlled or restrained students?

14 A. Yes. And I do remember that Becky Falcone  
15 specifically used that terminology, we are a very  
16 confrontational school.

17 Q. And coming back to what students can wear,  
18 you said so they have to wear kind of a uniform. Was  
19 there any discussion of jewelry?

20 A. Yes, that you can't wear anything, no  
21 jewelry, unless you were upgraded to the black shirt.

22 Q. And does that include, you know, like  
23 pierced earrings?

24 A. I believe that's one of the items that  
25 you're allowed to wear if you're upgraded to the --

1 Q. If you're upgraded to a black shirt.

2 A. Correct.

3 Q. And what did they -- did they talk about  
4 scheduling at all, what the schedule was for the day?

5 A. I believe it was 7 to 3 or something like  
6 that. That there were 80 minute periods.

7 Q. And did they say that anything about  
8 homework being completed in school?

9 A. Yes. They said that all homework and any  
10 academic work would be completed in school on facility  
11 and that nothing would be brought in or out of the  
12 school.

13 Q. Did they talk about placement tests?

14 A. No.

15 Q. Did they talk about the curriculum, their  
16 course offerings?

17 A. I asked about that for more details, because  
18 she mainly talked about expedited general ed for the  
19 purpose of just graduating, and it didn't seem like  
20 there was much, other than the general ed core  
21 classes.

22 Q. And you said something about Ms. Falcone  
23 described it as last -- as a last chance school. Was  
24 there other language that you recall about how she  
25 described the school?

1 A. During the orientation?

2 Q. Yes.

3 A. Mostly she used words like we are very  
4 confrontation, last resort, we only offer general ed  
5 here, things like that.

6 Q. Now, you eluded to the fact that you had a  
7 separate discussion with Ms. Falcone; is that right?

8 A. Yes.

9 Q. When was that?

10 A. Immediately after the orientation.

11 Q. And who -- was anybody else present for that  
12 discussion?

13 A. Balahl.

14 Q. And tell --

15 A. And Khadidja, sorry.

16 Q. Khadidja. Khadidja wouldn't have understood  
17 anything.

18 A. No.

19 Q. And tell us what was discussed with Ms.  
20 Falcone?

21 A. We discussed some of our frustrations with  
22 the placement at Phoenix Academy, especially after  
23 having gone through that orientation. I asked her  
24 about the ESL offerings, how long they were, how many  
25 periods they got. What she told me that there was one

1 class, and it was an 80-minute class and that her and  
2 the head of ESL at Phoenix both felt overwhelmed by  
3 this and didn't feel like refugees should be placed  
4 there either, and that they had tried to bring this up  
5 to the school district, but there was no resolve, and  
6 that perhaps we would have a better chance for  
7 advocating for this.

8 Q. Was there -- is there anything else that you  
9 recall about their orientation that I haven't asked  
10 you about?

11 A. We discussed the pat downs, we discussed the  
12 uniforms, the very general ed curriculum. They talked  
13 about the expedited credits that they could achieve  
14 and graduate faster. They talked about pretty much  
15 all of the things that we've discussed here.

16 Q. What was your reaction to that orientation?

17 A. I was shocked, I was disappointed that  
18 that's where these students who have gone through so  
19 much were being placed, and I felt that it was  
20 important to try to find a better solution for these  
21 students.

22 Q. Did you shortly after this orientation make  
23 notes about what it is you'd observed?

24 A. Yes, I did.

25 Q. And did you end up e-mailing those notes to



1 a number of people?

2 A. Yes, I did.

3 Q. If you could open your binder to Exhibit 55.

4 THE COURT: This is day 1 or 2?

5 MR. WALCZAK: 2, today, yeah.

6 THE COURT: I'm sorry, that was Exhibit  
7 55?

8 MR. WALCZAK: Yes.

9 (Pause)

10 BY MR. WALCZAK:

11 Q. I'm going to show you what's been marked as  
12 Exhibit 55. Do you recognize this?

13 A. Yes.

14 Q. What is it?

15 A. It's an e-mail from Sheila, who's head of  
16 Churchworld Services in Lancaster.

17 Q. And this is to you?

18 A. Yes.

19 Q. And if you could look through the exhibit  
20 and then just briefly describe what's in this fairly  
21 lengthy series of e-mails. Just very generally, I  
22 don't need details.

23 A. Yeah, I'm familiar with this.

24 Q. And so what is this e-mail, what were you  
25 attempting to do here?

1           A.    I was trying to show them what I had found  
2 out, as far as what ELL students are legally entitled  
3 to, what their rights are. What my experience was  
4 during the orientation at Phoenix Academy, trying to  
5 determine whether or not they had experienced similar  
6 situations.

7           Q.    Uh-huh. So is it fair to say this is kind  
8 of a combination of your legal research and then your  
9 observations at the orientation and your experiences  
10 with your clients?

11          A.    Yes.

12          Q.    After you'd been to this orientation, did  
13 you undertake some efforts to try to promote change in  
14 Lancaster School District?

15          A.    Yes, I did. I first started internally and  
16 it went all the way up to the head of LCFS, which was  
17 the umbrella organization.

18          Q.    Umbrella organization for Lutheran --

19          A.    Refugee Services, yes. And all of them were  
20 in accord that we needed to work on changing this. So  
21 my site director, Janet Panning (ph), who was one of  
22 his direct supervisors and Sheila, our goal was to try  
23 to get some meetings with the school district so that  
24 we could try to create some change.

25          Q.    Did you reach out to any government

1 agencies?

2 A. Eventually, yes, I did.

3 Q. Okay. Which ones?

4 A. The Department of Education.

5 Q. And what did you do with the Department of  
6 Education?

7 A. First I looked on their websites to see  
8 whether or not, you know, what the legal grounds were  
9 for any of this, and I reached out and I called one of  
10 the departments and spoke with a Josh Galleo (ph) or  
11 something like that, who talked to me about what the  
12 process would be, and listened to what the particulars  
13 of this situation was and stated that we -- it sounds  
14 like we may have a case, and I would have to file a  
15 complaint on line.

16 Q. And did you file such a complaint?

17 A. Yes, I eventually did.

18 Q. Did you reach out to anybody in Pennsylvania  
19 government, state government?

20 A. I did reach out one of our supervisors who's  
21 head of the refugee programs in Pennsylvania.

22 Q. Did you reach out to lawyers or advocacy  
23 groups?

24 A. I did reach out to the ACLU.

25 Q. Now, you mentioned that you were trying to

1 get a meeting with the school district. Did there  
2 occur a meeting with district officials in March?

3 A. I don't remember the exact date, but yes,  
4 there was a meeting.

5 Q. Okay. Could it have been March 17th, St.  
6 Patrick's Day?

7 A. I believe so.

8 Q. And did you attend that meeting?

9 A. Yes.

10 Q. And who else was at that meeting?

11 A. It myself, Sheila from Churchworld Services,  
12 Valentina Ross from Churchworld Services, Dr. Abrams  
13 from the school district, and Superintendent Dr. Rau  
14 from the school district.

15 Q. So the two district officials were  
16 Superintendent Rau and Dr. Abrams who we've discussed  
17 previously.

18 A. Yes.

19 Q. What were -- did Churchworld Services and  
20 Lutheran Refugee Services raise concerns or issues  
21 with the district officials in that meeting?

22 A. Yes, we did raise concerns.

23 Q. And what were the concerns that you raised?

24 A. All the concerns that we've been discussing,  
25 process with enrollment, delays, denials to

1 enrollment. I even tried to discuss particular cases,  
2 instances of bullying all of that, ESL curriculum,  
3 what they offer, what the law says that are guidelines  
4 state that they should offer.

5 Q. And did the -- either the district officials  
6 respond to the individual -- the concerns you raised  
7 about individual students?

8 A. At the end of the meeting when I did bring  
9 up those individual concerns, Dr. Rau stated that she  
10 didn't want to hear any particular cases, that these  
11 were serious allegations that I was making, and that  
12 she would need to do an investigation and upon  
13 completion she would look at those individual cases.

14 And then I stated, well that's going to take  
15 a lot of time, we're almost nearing the end of the  
16 school year and some of these students are falling  
17 through the crack, so in the meantime what's going to  
18 happen with them. And she refused to look at  
19 individual cases.

20 Q. And whose cases did you raise at that  
21 meeting?

22 A. Qasin mostly because of the incidents of  
23 bullying that occurred.

24 Q. Now, do you recall was there a discussion  
25 about whether -- strike that.

1           So you had testified earlier that during the  
2 call on -- I believe it was on January 4th, there was  
3 a discussion about whether he should go to school or  
4 maybe I'm sorry, this is February 11th, about going to  
5 school or getting a job. Was there any of that  
6 discussion at this meeting with Dr. Rau and Dr.  
7 Abrams?

8           A. They did discuss that some refugees that  
9 come in are better suited for employment or ESL  
10 classes, to which I stated similar to other instances,  
11 the same thing, perhaps employment is a general goal  
12 for all individuals in the end, but that education  
13 opens many more doors, and that this is something that  
14 they need.

15           We talked about ESL, Dr. Rau stated that you  
16 know, she agreed that this was not -- their ESL  
17 program was not up to par and pointed to a sign that  
18 was up on the wall, that she needed to reinvent the  
19 ESL program and many --

20           Q. What was the sign she pointed to?

21           A. It was a piece of paper that perhaps they  
22 had written things on during an internal meeting to  
23 discuss plans of action or areas that they needed to  
24 improve, and her and Dr. Abrams both pointed to it,  
25 stating that they had the ESL program evaluated, and

1 that it wasn't up to par and that they knew that it  
2 was an issue.

3 Q. And when you say the ESL program, was that  
4 the program at Phoenix or at McCaskey?

5 A. That even the one at McCaskey wasn't fully  
6 up to par, and that was what Dr. Rau stated, and so if  
7 the one at Phoenix Academy offered even less, then I  
8 would assume that that would also be not up to par.

9 Q. But Dr. Rau said they would be making  
10 changes to the ESL program at McCaskey?

11 A. I believe so.

12 Q. Was there some discussion about the best  
13 place for students being socialized?

14 A. Yes. There were comments about whether or  
15 not students should go to school or not, and we  
16 discussed why a high school education is beneficial  
17 not just academically to which Dr. Abrams responded  
18 well if socialization is what they're after, they can  
19 go to somewhere like church, among other institutions  
20 that he mentioned, which we thought was not  
21 appropriate at all.

22 Q. Anything else about that meeting that I  
23 haven't asked you about that you'd like to tell us?

24 A. Generally we just discussed the topics at  
25 hand, and we tried to advocate for these refugees and

1 for change to occur for future refugees coming in, and  
2 it was the stance of both Churchworld Services and  
3 Lutheran Refugee Services that these changes needed to  
4 occur, and Dr. Rau and Dr. Abrams did make some  
5 acknowledgement to the need for those changes.

6 Q. Was there any discussion about these  
7 students should be going to McCaskey as opposed to  
8 Phoenix?

9 A. We asked why students couldn't go to the  
10 international school instead of going to Phoenix  
11 Academy and there was no real concrete reason why,  
12 they just said this is how it is.

13 Q. This is how it is?

14 A. Uh-huh.

15 Q. Okay. Now, in early April, did you attend  
16 an enrollment meeting on behalf of some other Lutheran  
17 Refugee Services clients?

18 A. Yes.

19 Q. Okay. And do you know if those were minors?

20 A. No, I don't believe so.

21 Q. They're not minors?

22 A. The Chengs? No.

23 Q. So who were these -- just -- I don't want to  
24 implicate folks we don't need to implicate here.

25 THE COURT: I wonder, Counsel, would



1 this be a good time -- I was hoping we could finish  
2 the direct, take a 15 minute recess, finish with the  
3 cross-examination and redirect and then break for  
4 lunch. Everyone's been sitting for quite some time,  
5 is this a good break in direct and how much longer do  
6 you believe your direct will be?

7 Well, since it takes that long to  
8 answer, I think we should take a 15 minute recess.

9 MR. WALCZAK: Thank you, Your Honor.

10 THE CLERK: All rise.

11 (Recessed at 11:24 a.m.; reconvened at 11:36  
12 a.m.)

13 THE CLERK: All rise.

14 (Call to Court)

15 THE COURT: You may be seated, thank  
16 you. The court is called to order. All parties  
17 previously present are once again present. The  
18 witness is on the witness stand. Counselor, you may  
19 proceed.

20 MR. WALCZAK: Thank you, Your Honor.

21 BY MR. WALCZAK:

22 Q. Ms. Chesson, when we broke, I had just asked  
23 you about an April 5th enrollment meeting you attended  
24 on behalf of a couple of Lutheran Refugee Services'  
25 clients. Who were those clients?

1           A.    The Chengs.

2           Q.    Who were the Chengs?

3           A.    They were refugees that came, who were  
4 resettled in Lancaster through our agency.

5           Q.    And where are they from?

6           A.    Burma.

7           Q.    And what was the problem?

8           A.    Problem with their enrollment or could you  
9 clarify the question, please?

10          Q.    I mean, why were you meeting with the school  
11 district?

12          A.    We were just trying to enroll the students  
13 in school.

14          Q.    And who was at this meeting?

15          A.    Megan Brown, myself, there were several  
16 meetings leading up to it, so if you want to clarify  
17 which meeting or should I just go chronologically?

18          Q.    Well, this was the -- I'm just asking about  
19 the first -- my understanding the first meeting was  
20 April the 5th.

21          A.    I don't remember the dates, but I do  
22 remember what happened on each date.

23          Q.    Okay. Why don't you tell us what happened  
24 with the Chengs and your attempts to enroll them?

25          A.    Sure. Megan Brown was their case manager.

1 I had already been familiar with the issues that we  
2 had been having with the school district, so I came  
3 along as a support and advocate for their enrollment.

4 One of the initial meetings or contact with  
5 the school district, Megan Brown, the two siblings,  
6 myself and their mother went to the school district to  
7 provide them with documentation that was required for  
8 their enrollment.

9 Q. And did you then have an enrollment meeting  
10 with Mr. Blackman?

11 A. Yes, we did.

12 Q. And who else was at that meeting from the  
13 district?

14 A. Amber Hilt and then at some point, Dr. Jay  
15 Butterfield walked in.

16 Q. And do you know who Dr. Butterfield is?

17 A. I don't know who he is.

18 Q. Do you know if he works for the district?

19 A. Yes, he does.

20 Q. And what happened at that meeting with Mr.  
21 Blackman and Ms. Hilt?

22 A. We came in to discuss enrollment and  
23 placement, and Mr. Blackman was the first one present.  
24 He was looking through his system to look at what he  
25 had in there for the students, as far as their

1 placement and what not, and then discussed that he  
2 would be placing them at Phoenix Academy.

3 Q. And I'm sorry, these students are from  
4 where?

5 A. Burma.

6 Q. And do you remember how old they were?

7 A. I believe 19 and 20, but I'm not sure.

8 Q. 19 and 20, so they were older students.

9 A. Yes, yes.

10 Q. And do you recall whether they wanted to  
11 attend school?

12 A. Yes, they did.

13 Q. Okay. And so Mr. Blackman initially said  
14 they would be going to Phoenix.

15 A. Yes, after much conversation and advocacy on  
16 our behalf, he said, well, I will place them at  
17 Phoenix.

18 Q. Okay. Did he initially not want to place  
19 them at Phoenix?

20 A. There was some reluctance, there was some  
21 fumbling around with papers, and not being able to  
22 find them in the system. And then Amber Hilt came in  
23 later, she was a bit late to the meeting. And finally  
24 he said, okay, well we'll place -- and they were  
25 discussing the first student, we'll place her at

1 Phoenix Academy.

2 Q. And did you push for placement at McCaskey?

3 A. Yes, I did.

4 Q. Okay. And what was the response for that?

5 A. That you would -- at least you'll have to  
6 speak to Amber Hilt, and I said no problem, I spoke to  
7 Amber Hilt when she did come in, who said that I would  
8 have to bring it up with Dr. Abrams, and I said I  
9 would do that.

10 Q. And after Ms. -- so Ms. Hilt came in in the  
11 middle of this meeting.

12 A. She came in late, yes.

13 Q. Or during the meeting.

14 A. During the meeting.

15 Q. And what happened after -- did something  
16 change in terms of what they wanted to do with  
17 enrollment after Ms. Hilt came in?

18 A. Yes, I had talked about that I wanted them  
19 to go to McCaskey, and explained why I thought that  
20 was a better placement. And then they decided they  
21 were going to ask questions to the two students, and  
22 so they proceeded to ask questions. And the  
23 interpreter that we brought from our agency was asking  
24 the -- interpreting the questions, and at some point  
25 in time, they asked whether or not they had some sort

1 of documentation from their schooling back in Burma,  
2 at which point they said, yes, everyone who leaves  
3 gets some sort of certificate of leave is what they  
4 called it. And then the conversation ended right  
5 there, Mr. Blackman said, well, that -- and Amber  
6 Hilt, I don't know which one of them or if it was both  
7 of them, said that that disqualifies them from being  
8 able to enroll. They are no longer eligible.

9 Q. Because they had this certificate from  
10 Burma.

11 A. Correct.

12 Q. Okay. And did you respond to that?

13 A. I said, how does a certificate of 8th, 9th,  
14 10th grade equate to a U.S. high school degree. And  
15 if that's the case, then are they eligible to go  
16 anywhere else, like community college or anything like  
17 that.

18 Q. And what was the response to that?

19 A. There was some uncertainty as to whether or  
20 not they could, but they ultimately said yes, and I  
21 responded, well, what about things like FAFSA, what  
22 about the application, they don't have any money, so  
23 who's going to assist them with all of that stuff.  
24 And at that point in time that's when the Dr. Jay  
25 Butterfield, I don't know if that's his name, came in

1 and tried to buffer the situation and suggested that  
2 we could meet with a counselor at McCaskey.

3 Q. Back up a little bit.

4 A. Uh-huh.

5 Q. So they had suggested that the -- it's a  
6 brother and sister here from Burma.

7 A. Yes.

8 Q. They had suggested that they could go to  
9 college?

10 A. When I asked what their path was, because  
11 they are leaving with whatever it is, 9th, 10th grade  
12 degree from Burma, that they wanted to pursue an  
13 education, what the path would be. And we discussed  
14 multiple avenues and one of them was community  
15 college. We discussed that there was HACC locally and  
16 that they --

17 Q. What is HACC?

18 A. Harrisburg Area Community College, and I  
19 believe they have a satellite campus in Lancaster.

20 Q. Okay. And you said earlier, you used the  
21 term FAFSA, you asked about FAFSA, what is that?

22 A. It's an application to determine your  
23 eligibility for financial aid to go to school.

24 Q. And do you know whether this family had  
25 money to go to HACC or any place else?

1           A.    No, they did not have any money.

2           Q.    And unlike a public school, like School  
3 District of Lancaster, can you go free to HACC?

4           A.    No.

5           Q.    There is financial aid available, though,  
6 right?

7           A.    Yes.

8           Q.    Do you know if it's available to or whether  
9 it was available to those individual students?

10          A.    Well, we did assist them with the FAFSA  
11 application, our agency, and I believe it was  
12 determined that they could not get any assistance.

13          Q.    They could not get any assistance, financial  
14 aid assistance to go to HACC?

15          A.    Correct.

16          Q.    And how did that meeting end or tell us what  
17 you know about what ended up happening with this  
18 brother and sister from Burma. Did they ever go to  
19 school?

20          A.    We then went to the meeting that we were  
21 told that they were going to give some counseling, a  
22 follow-up session, assistance with the FAFSA,  
23 assistance with the HACC application. We showed up to  
24 the McCaskey High School and we met with the counselor  
25 there. There was some delays because she was dealing



1 with other issues with students, but finally we did  
2 meet with her, and she handed us -- she didn't seem  
3 like she was really up to par on what the situation or  
4 history of the situation was. She kind of just gave  
5 us a paper application to HACC, which we could have  
6 done on our own, and then we started filling it out.  
7 She had to leave, we left, so there wasn't much  
8 assistance, or follow-through, or promise that they  
9 would monitor or see anything through.

10 Q. How long was that meeting with the  
11 counselor?

12 A. Once we finally met the counselor, not  
13 counting the waiting time, it was very brief.

14 Q. How long would you estimate?

15 A. Maybe 10, 15 minutes.

16 Q. Okay. And do you know what ultimately --  
17 and so this is April of this year, April, May.

18 A. Yes, yes.

19 Q. And do you know what the status of these two  
20 Burmese school aged students is?

21 A. Because of financial hardship, they don't  
22 have the money to be able to go and pursue their  
23 education at HACC.

24 Q. So as of right now, they're not in any  
25 educational program?

1           A.    Not that I know of.

2           Q.    Do you know for a fact that they want to get  
3 an education?

4           A.    Yes.

5           Q.    All right.  And we're back in early April.  
6 Does Qasin come back into the picture at this point?

7           A.    Yes.

8           Q.    Tell us what happens in early April to bring  
9 Qasin back to your attention?

10          A.    Several things happened.  My clients often  
11 come in in the TANF program we have to monitor and  
12 keep records of the community service and ESL that  
13 they do.  We offer other services, so they'll come in.  
14 And one of the occasions, Qasin came in with his  
15 mother, several of the occasions, he discussed  
16 bullying, and then one of them at our meeting, he  
17 brought -- they brought a piece of paper that the  
18 school had brought to their home, during a home visit.  
19 They wanted clarification on what that document was  
20 because it was English.

21          Q.    So you mentioned a home visit, what's your  
22 understanding of what happened there?

23          A.    The student and his mother came to me, they  
24 requested my assistance in trying to figure out what  
25 this document was.  It was a blank document from

1 Phoenix Academy and it listed M. Darden (ph), I don't  
2 remember the first name, and it was a blank document  
3 that was requesting that they come to the school the  
4 next day.

5 I called the individual on that document who  
6 --

7 Q. I'm sorry, who did you call?

8 A. If I had the documents in front of me, I  
9 would know what her name is, I believe it was Darden,  
10 she's the home visitor for Phoenix Academy or the  
11 school district.

12 Q. If you could turn to Exhibit 56, that's the  
13 binder we gave Your Honor this morning.

14 A. Margarita.

15 Q. Okay. Do you recognize this document?

16 A. Yes.

17 Q. Okay. And what is it?

18 A. It's the piece of paper that the family  
19 brought to my attention when they came and visited our  
20 agency.

21 Q. And now there's some writing on that  
22 document.

23 A. Yes.

24 Q. Who's writing is that?

25 A. That's mine.

1 Q. And so your understanding is that the --  
2 somebody came from the school, came to Qasin's house  
3 and left this form?

4 A. They told me through an interpreter that  
5 they received a visit the evening before or so, I  
6 don't remember if it was the night before or the night  
7 before that, but that a home visitor came and gave  
8 them piece of paper and they didn't quite understand,  
9 but that they were supposed to come back to the  
10 school.

11 At which point I called the phone number on  
12 the piece of paper and I spoke with Margarita and  
13 inquired as to why they had gone to the home, why  
14 there was no interpretation. She responded, the  
15 school district does not have an Arabic speaker, and I  
16 inquired why they were requesting for them to come  
17 back to the school. And I guess it was about having  
18 Faisa, Qasin's mother sign him out of school. At  
19 which point I requested to be present to the meeting.

20 Q. And did Margarita respond to your request to  
21 attend the meeting?

22 A. She said that's fine. That I could attend  
23 and where it was and what time it was at and I wrote  
24 that down.

25 Q. That's what you wrote on the form?

1 A. Yes.

2 Q. Okay. And did you get a call from somebody  
3 shortly after you spoke to Margarita?

4 A. Yes. Within a few minutes I got a phone  
5 call from somebody who must have gotten my phone  
6 number from Margarita on my caller ID, telling me that  
7 I was not allowed to go to this meeting.

8 Q. You were not allowed to go to the meeting  
9 with your client?

10 A. Correct.

11 Q. And who was it that called you?

12 A. I believe it was Aura Heisey.

13 Q. And do you know who she is?

14 A. The principal at Phoenix Academy.

15 Q. And did she tell you why you couldn't attend  
16 the meeting?

17 A. She said this meeting is only for students  
18 and their parents.

19 Q. And did you push back on that?

20 A. Yes, I did.

21 Q. And what did you say?

22 A. I stated that they went to the client's home  
23 without an interpreter and that if they're going to  
24 have someone sign a legal document withdrawing them  
25 from the school district that they need to have

1 someone understanding what they're signing  
2 interpreting and that we're representing this client  
3 and that we want to advocate on their behalf. Then we  
4 -- I directed my further comments and requests to be  
5 present at that meeting to Dr. Abrams.

6 Q. Did she tell you that you could contact Dr.  
7 Abram?

8 A. I believe I just did so after that phone  
9 call, but I don't remember --

10 Q. So she just called and said you can't attend  
11 the meeting?

12 A. Correct. And then I believe I just -- after  
13 receiving that very weird phone call from someone I  
14 didn't give my phone number to, I contacted Dr. Abrams  
15 requesting that we have a right to be present at that  
16 meeting.

17 Q. Could you turn to Exhibit 57 in your binder?

18 A. Yes.

19 Q. And do you recognize this?

20 A. Yes.

21 Q. And what is this?

22 A. It's that e-mail in question, I believe.

23 Q. Now if you turn to the second page, I  
24 believe at the bottom it says Issa 468

25 A. Okay.

1 Q. What -- so in here, you outline your  
2 concerns about Qasin; is that right?

3 A. Yes.

4 Q. And then on the last page in that second  
5 paragraph that you discuss Ms. Heisey's call to you?

6 A. Yes.

7 Q. And is there anything in what you've written  
8 here that you would change today or well, this is what  
9 you wrote at the time, correct?

10 A. Correct.

11 Q. And what was the, kind of, end result of  
12 this e-mail exchange with Mr. Abram -- Dr. Abram, I'm  
13 sorry?

14 A. That after this exchange, Dr. Abram stated  
15 that we could attend that meeting.

16 Q. And did you, in fact, attend the meeting?

17 A. Yes, I did.

18 Q. Okay. And was that on February, I'm sorry,  
19 on April the 7th?

20 A. Yes.

21 Q. And who attended that meeting?

22 A. Myself, Qasin, Faisa, his mother, Ballal  
23 (ph) who was going to be offering interpretation. On  
24 the school district side there was Aura Heisey,  
25 principal. There was Amber Hilt, Jack Blackman who

1 kind of sat on the sidelines and then there was a  
2 gentleman who had something to do with security or  
3 student services for Phoenix Academy. I think that's  
4 everything and then they had an interpreter as well.

5 Q. Okay. And what happened at that meeting?

6 A. We discussed a lot of the issues Qasin was  
7 facing, both with the bullying and academically. We  
8 discussed that home visit, the lack of interpretation,  
9 why they were having someone come to the school and  
10 sign a document like that without interpretation or  
11 them even understanding what was going on, things like  
12 that.

13 Q. Now, you mentioned bullying a few times?

14 A. Yes.

15 Q. And did your client complain to you about  
16 bullying at Phoenix?

17 A. Yes, he did.

18 Q. And how often did he complain to you?

19 A. Several occasions when he came in with his  
20 mother and his mother also talked about that, their  
21 frustrations with the bullying,.

22 Q. And so it was more than once?

23 A. Yes.

24 Q. And what were the types of bullying that  
25 they complained about?



1           A.    Qasin referenced incidents where he was in  
2 the bathroom stall and people were banging on the  
3 door. He referenced incidents where people had called  
4 him the "N" word. Other incidents where people pulled  
5 his hair.

6                    We did go into discussions to try and  
7 understanding if he understood the nature of those  
8 occurrences and he said that yes, despite my language  
9 barriers, it's very obvious when someone is coming at  
10 your aggressively and confrontationally. I know the  
11 difference between a friend and someone who is  
12 bullying me.

13           Q.    Now, in your experience working with  
14 refugees, do you often have difficulty getting them to  
15 discuss problems they may be having?

16           A.    Yes.

17           Q.    And why is that?

18           A.    For many reasons. Often people already feel  
19 overwhelmed. They feel like they are sometimes an  
20 outsider in their own community. So if you speak up  
21 against something that you perceive to be an  
22 injustice, then you might fear that there would be  
23 retaliation or anything like that and we've seen that  
24 with refugees, who in their home countries will suffer  
25 greatly, even go to jail just for gathering in public

1 places. So these are things they're reluctant to  
2 share or even openly speak about.

3 Q. Are there times where you will discuss --  
4 well, and all or almost all of your interactions are  
5 through a translator, correct?

6 A. Interpreter, yes.

7 Q. And does the interpreter that's present  
8 sometimes color the translations?

9 A. No. And interpreter's role is just to  
10 translate verbatim what the person is saying.

11 Q. And are there times where you will discuss  
12 the same story and it changes slightly?

13 A. Yes.

14 Q. And are there times when a client may be  
15 more or less forthcoming about a particular situation?

16 A. Yes, especially if there are gender barriers  
17 are cultural barriers or who is present in the room.  
18 If they fear that it is going to affect whatever  
19 situation either in their community, with their peers,  
20 students, or academically then they are reluctant to  
21 share everything.

22 Q. Both Qasin and his mother had, you say,  
23 spoken to you a number of times about bullying at  
24 Phoenix?

25 A. Yes.

1 Q. And you presented these at that meeting on  
2 the 7th?

3 A. I presented this on several occasions to the  
4 school district, yes.

5 Q. And you had raised this actually at the  
6 meeting on March 17th?

7 A. Yes.

8 Q. And do you know whether Qasin had raised  
9 this personally with school officials?

10 A. I don't know everything that transpired in  
11 the school, but I do know that he expressed that it  
12 was difficult for him to even communicate with anyone  
13 in the school because no one spoke his language.

14 Q. And what was the end result of that meeting  
15 on April the 7th?

16 A. We discussed ways that we could address the  
17 bullying or the academic support or lack of. We  
18 discussed the environment there, the bullying and at  
19 the end of the meeting, I requested for him to be  
20 transferred to McCaskey.

21 Q. And did you get a response to that?

22 A. That's when Mr. Blackman spoke regarding  
23 that and stated that there needed to be an  
24 investigation on that bullying allegation for a  
25 transfer determination to be made.

1 Q. So there's no sort of resolution to whether  
2 Qasin would be transferred to McCaskey at that time?

3 A. Not at that meeting.

4 Q. If you could turn to Exhibit 58 in your  
5 binder? Do you recognize this?

6 A. Yes.

7 Q. And what is it?

8 A. It's a communication from me to Mr. Abrams,  
9 Dr. Abrams.

10 Q. Okay. If you'll go to the page marked 474  
11 at the bottom of Exhibit 58. Now is that an April 12  
12 e-mail from you to, among others, Dr. Abram?

13 A. You said 474?

14 Q. 474 at the bottom? Or is my --

15 I'm sorry, may I approach the witness?

16 THE COURT: Certainly counsel.

17 THE WITNESS: This April 12th is one  
18 line here and then into the other one? Okay.

19 BY MR. WALCZAK:

20 Q. Are you essentially saying in this e-mail  
21 that you had been told you'd get a response on Qasin  
22 by the 12th and it hadn't come yet?

23 A. Correct.

24 Q. And then staying on 474, you go above,  
25 there's another e-mail from you to Dr. Abram dated

1 afternoon of April 13th. Is that correct?

2 A. Yes.

3 Q. So had you not gotten a response from any  
4 district officials yet?

5 A. No.

6 Q. In that third paragraph of your April 13th  
7 e-mail, you describe Qasin's alleged bullying there?  
8 Is that right?

9 A. Yes.

10 Q. And you say, I'm still waiting for a formal  
11 response to our transfer request?

12 A. Correct.

13 Q. And then if you'll go to the proceeding  
14 page, 473 at the bottom. Looks like at the top of  
15 that page it says April 15, 2006 at 1:06 Arthur Abram  
16 and then dear Elyse?

17 A. Yes.

18 Q. Okay. And then do you recall receiving  
19 this?

20 A. Yes.

21 Q. And is this the district's kind of official  
22 response to your request to transfer?

23 A. Yes. On the e-mail, yes.

24 Q. Okay. And then there's something set out  
25 below the "dear Elyse" is that -- is it your

1 understanding that's a legal definition of bullying  
2 that's presented?

3 A. That's what he presented it as, yes.

4 Q. In the paragraph below that, the last  
5 sentence there reads the events that he described,  
6 even if they occurred were not severe, persistent, or  
7 pervasive. Do you see that?

8 A. Yes.

9 Q. And then if you could read the paragraph  
10 that begins "consequently" and this is from Dr. Abram?

11 A. Yes. "Consequently we have concluded as a  
12 result of the investigation that Qasin has provided no  
13 verifiable and/or credible information to substantiate  
14 that bullying was directed at him as defined by board  
15 policy number 252 in the public school code."

16 Continue?

17 Q. Please.

18 A. "Thus, as there is no verifiable and/or  
19 credible instances of bullying, Qasin's request for  
20 transfer from Phoenix Academy is denied. We further  
21 note that Qasin's statement that he feels unsafe at  
22 the Phoenix Academy is neither credible nor  
23 reasonable."

24 Q. So what was your understanding of what they  
25 were saying about your request to transfer Qasin?

1           A.    That they were pretty much brushing off the  
2   allegations and they weren't taking them seriously and  
3   that they were denying a transfer.

4           Q.    Did you share this information with Qasin?

5           A.    Yes.

6           Q.    Do you know whether the school district sent  
7   this information to Qasin?

8           A.    They did not.

9           Q.    They did not?

10          A.    No.

11          Q.    They didn't send it in English or in his  
12   native language?

13          A.    No.  They sent this to me, an e-mail after I  
14   asked them for a response.

15          Q.    And you discussed the school district's  
16   response with Qasin and his mother?

17          A.    Yes.

18          Q.    What was their reaction?

19          A.    Disappointed, kind of depressed that we're  
20   trying to advocate for them and create a better  
21   academic and whatnot environment for him and it's not  
22   going anywhere.

23          Q.    Is there any indication given by your client  
24   that he no longer -- or that he did not want to get an  
25   education?

1 A. No, no indication of that.

2 Q. Was there any indication whether he would  
3 continue to get that education at Phoenix?

4 A. They didn't feel safe there and in his own  
5 words he said to me once, "If you give me a choice  
6 between a prison or Phoenix Academy, I'll choose a  
7 prison." And they feared for themselves there. They  
8 didn't feel supported. They didn't feel like they  
9 were learning anything, so they felt it was a dead  
10 end.

11 Q. And did Qasin's mother share that with you?

12 A. Yes.

13 Q. And later in April was there a notice sent  
14 to Qasin's home from the school district?

15 A. Yes.

16 Q. And tell us about that notice?

17 A. They brought a letter to me and it was --

18 Q. They, I'm sorry, "they?"

19 A. Faisa and Qasin brought a letter to the  
20 resettlement agency LRS and it was in English and it  
21 was communication from the school district.

22 Q. Okay. Was there an e-mail or a letter at  
23 some point delivered to them in Somali?

24 A. Yes.

25 Q. When was that?



1 A. I don't remember the date.

2 Q. Okay.

3 A. But sometime in April or May -- late April  
4 or May.

5 Q. And the clients brought you that as well?

6 A. Yes.

7 Q. And do either of them read Somali?

8 A. Faisa stated that her reading ability wasn't  
9 enough to really understand everything that was going  
10 on in that letter or described in that letter.

11 Q. And do you know whether Qasin reads Somali?

12 A. I believe he does, but not fully.

13 Q. What's his principle language of  
14 communication, do you know or is preferred?

15 A. Somali.

16 Q. Somali or Arabic?

17 A. Somali. Perhaps it's more spoken and less  
18 with the reading and writing.

19 Q. If you could look at day one binder now.  
20 Exhibit 26.

21 THE COURT: I'm sorry, counsel, what number  
22 was that?

23 MR. WALCZAK: 26.

24 BY MR. WALCZAK:

25 Q. Do you recognize what's marked as Exhibit

1 26?

2 A. Yes.

3 Q. And what is it?

4 A. A letter from ACLU counsel to the school  
5 district.

6 Q. On behalf of Qasin?

7 A. Yes.

8 Q. And did you see this letter on or on the day  
9 or near the day on which it was sent?

10 A. Yes.

11 Q. And do you know what the letter requests of  
12 the district?

13 A. It had to do with the transfer.

14 Q. It's requesting that Qasin be transferred to  
15 McCaskey?

16 A. Yes.

17 Q. And do you know whether as of this date,  
18 Qasin has been accepted at McCaskey?

19 A. He has not.

20 Q. And do you know whether Qasin has returned  
21 to Phoenix at all since early April?

22 A. He has not.

23 Q. And what's your understanding of why he  
24 would not -- he was not going back to Phoenix?

25 A. He didn't feel safe there. He didn't feel

1 supported academically. He didn't feel like he was  
2 learning anything and he didn't feel like any of these  
3 complaints were addressed in a respectful or  
4 productive way.

5 MR. WALCZAK: Your Honor, we would move  
6 in Exhibits -- actually one last brief line of  
7 questioning.

8 BY MR. WALCZAK:

9 Q. At some point this spring, is it -- did  
10 Lutheran Refugee Services close operations in  
11 (indiscernible)?

12 A. Yes.

13 Q. And when was that?

14 A. Officially they closed at the end of June,  
15 but most of the staff was let go by May 13th.

16 Q. And do you know whether that was for a lack  
17 of funding?

18 A. Yes, Liberty Lutheran.

19 Q. So you stopped working in your official  
20 capacity with Lutheran Refugee Services in May?

21 A. Yes.

22 Q. Did you continue to maintain communications  
23 with some of the -- your former clients?

24 A. Yes.

25 Q. And have you been assisting the lawyers now

1 working on behalf of these clients with the  
2 litigation?

3 A. Yes.

4 MR. WALCZAK: Your Honor, we would move  
5 in Exhibits, I think we already did one earlier. This  
6 would be 52, 53, 54, 55, 56, 57, 58, and then going  
7 backwards 16, 26, and 40.

8 THE COURT: Attorney O'Donnell, what is  
9 the position of the defense with respect to those  
10 exhibits?

11 MS. O'DONNELL: I have an objection to  
12 number 26. No objection to the remainder.

13 THE COURT: And 26 is the letter?

14 MS. O'DONNELL: 26 is the ACL to folks  
15 at the district and it's signed by counsel Witold  
16 Walczak and copied to two other attorneys. I don't  
17 know how this -- again, I don't know how it's  
18 probative one way or the other.

19 MR. WALCZAK: Your Honor, it is a  
20 request that Qasin Hassan be transferred from Phoenix  
21 to McCaskey. It seem to me that it's highly relevant  
22 to what's going on here.

23 THE COURT: It is -- okay, counselor?

24 MS. O'DONNELL: Sure. I don't think it  
25 tends to prove or disprove a claim or any of the

1 elements of their case. It's simply a request for a  
2 child to be placed in between lawyers.

3 THE COURT: What I think it is is part  
4 of the story of this case, the history and how it came  
5 to be that we are sitting in federal court in Easton.  
6 And for that limited purpose without accepting  
7 anything within that document as being true, but  
8 simply as notice to the school district that the ACLU  
9 now represents Mr. Hassan and that the school district  
10 is on notice that they wish, through counsel, to have  
11 him back in McCaskey. I'll allow it for that limited  
12 purpose.

13 (Plaintiff's Exhibit No. 26 received)

14 MR. WALCZAK: That's all we seek, Your  
15 Honor. Thank you.

16 THE COURT: Without objection with  
17 respect to Exhibit 16, 40, 52, 53, 54, 55, 56, 57, and  
18 58, those Plaintiff's exhibits are admitted without  
19 objection.

20 (Plaintiff's Exhibit Nos. 16, 40, 52, 53, 54, 55,  
21 56, 57, and 58 received)

22 MR. WALCZAK: Thank you, Your Honor.

23 THE COURT: Thank you, counselor.

24 Attorney O'Donnell, are you ready to  
25 begin your cross-examination?

1 MS. O'DONNELL: I am.

2 THE COURT: And are you ready to be  
3 cross-examined?

4 THE WITNESS: Yes.

5 CROSS-EXAMINATION

6 BY MS. O'DONNELL:

7 Q. Good afternoon, Ms. Chesson.

8 A. Hi.

9 Q. We've met before today at your deposition.  
10 Do you recall that?

11 A. Yes.

12 Q. A few questions about your present position.  
13 Are you working now?

14 A. No.

15 Q. Okay. Do you know whether or not Lutheran  
16 Refugee Services has relocated its central  
17 Pennsylvania site?

18 A. A new organization took over, so they did  
19 not relocate.

20 Q. Who is the organization that took over?

21 A. Bethany Christian Services.

22 Q. So when you say take over, was that a  
23 purchase of Lutheran Refugee Services south central  
24 Pennsylvania site?

25 A. I wouldn't be the one to comment on how that

1 transaction occurred, but Bethany Christian Service  
2 sis the new resettlement agency in Lancaster.

3 Q. And did Bethany resettlement services take  
4 the employees from Lutheran Refugee Services and  
5 transfer them over to Bethany?

6 A. They only hired limited. They hired one  
7 full time site director and two part time staff and  
8 they weren't going to be opening programs or getting  
9 funding for programs until October, at which point  
10 they would hire basic full time staff.

11 Q. Okay. And do they have the same services  
12 and the same programs available to, for example, your  
13 clients with Lutheran Refugee Services as Lutheran  
14 Refugee Services had for them? In other words, were  
15 they able to make a smooth transition of the clients  
16 and the programs.

17 A. No. Clients were transferred to Church  
18 World Services.

19 Q. Okay. So for example, would the Hassan  
20 family now be clients of Church World Services?

21 A. They did become Church World Services  
22 clients.

23 Q. And are you an employee of Church World  
24 Services?

25 A. No.

1 Q. What actual relationship do you have now to  
2 the Hassan family?

3 A. Just advocacy.

4 Q. Friend?

5 A. Advocacy on their behalf for education.

6 Q. You don't have -- as I understand it, you  
7 don't have an agency on behalf to work on behalf of to  
8 represent or advocate for this family. Is that  
9 correct?

10 A. Correct, however I don't believe you need an  
11 agency to advocate on behalf of someone.

12 Q. Well, okay. But I'm just -- the question  
13 simply is are you acting on behalf of an agency as you  
14 sit here and testify today?

15 A. No.

16 Q. You are acting as an individual who is a  
17 friend of the Hassan family. Is that correct?

18 A. Yes.

19 Q. Okay. I think you told us on the direct --  
20 on your direct testimony that Faisa's two oldest  
21 children elected not to go to school. Is that  
22 correct?

23 A. Yes, Faisa's children did not.

24 Q. Okay. Now, Qasin is about to turn 18 years  
25 old. Is that correct?



1 A. Yes.

2 Q. And would he be old enough now to elect not  
3 to go to school if he chose not to go to school?

4 A. If that was his choice.

5 Q. Okay. Your answer is yes?

6 A. If that was his choice, yes.

7 Q. Okay. If you would please turn in the day  
8 two binder back to Exhibit 52. I believe this was the  
9 first exhibit you testified about and it's your bio  
10 data form, do you see that, the Lutheran Immigration  
11 and Refugee Service bio data form?

12 A. Yes.

13 Q. Okay. And if you would turn with me, please  
14 to a page that's been bates stamped 7?

15 A. Okay.

16 Q. Okay. Now, you testified that Qasin's date  
17 of birth is September 1 of 1998. Do you see that?

18 A. That's what's written on here, yes.

19 Q. Now, where does that information come from?

20 A. From the government.

21 Q. From the family?

22 A. No, from the state department, from the  
23 family, from documents. I can't tell you exactly how  
24 that date of birth comes overseas. That's the  
25 documents we are presented with as an agency.

1 Q. So when Qasin testified yesterday that his  
2 birthday was September 9th, was that wrong or is this  
3 document wrong?

4 A. I can't tell you. I don't know.

5 Q. Do we know? Does anyone know what Qasin's  
6 date of birth is?

7 A. Yes. People do know what their dates of  
8 birth are.

9 Q. So when he testified under oath yesterday,  
10 do we believe him or this document?

11 A. I can't say what the Court believes.

12 Q. Okay.

13 THE COURT: It was interesting  
14 yesterday. I don't know if everybody caught it, but  
15 he also testified his first day in the United States  
16 was September 9th.

17 MS. O'DONNELL: He also testified that  
18 way in deposition, as well.

19 BY MS. O'DONNELL:

20 Q. So did he come into the country on his  
21 birthday?

22 A. I don't know when he came into the country.

23 Q. Okay. Would that be something that you  
24 would know as a person working for the agency?

25 A. I can review documents but if I wasn't

1 present as his R&P case manager, I can't tell you.

2 Q. Okay.

3 MS. O'DONNELL: Yes, that's how I  
4 understood his testimony as well, Your Honor.

5 BY MS. O'DONNELL:

6 Q. Yesterday he also said that he spoke Arabic;  
7 is that correct?

8 A. Yes, he does.

9 Q. Okay. And on this page it says that he  
10 speaks Somali.

11 A. Yes.

12 Q. Okay. Is the fact that he testified that he  
13 speaks Arabic, was that important to include on his  
14 bio data form?

15 A. Yes, language is indeed important.

16 Q. Okay. And has it been included here?

17 A. No.

18 Q. Okay. Do you know why not?

19 A. No.

20 Q. I'd like to direct your attention, please,  
21 to the document in the same exhibit, Bates stamped 12.  
22 Do you see that? And then the middle paragraph is  
23 something that you've already testified about so I  
24 don't need to have you re-read it. But in that middle  
25 paragraph that begins CW and clients; do you recall

1 that?

2 A. Yes.

3 Q. Okay. And remind us again who CW is.

4 A. It would be a case worker.

5 Q. A case worker. And do we know who that case  
6 worker is?

7 A. Megan.

8 Q. Okay. And what age do they have Qasin  
9 identified here?

10 A. Seventeen.

11 Q. Okay. Were you aware at this point that the  
12 District had an issue with Qasin's age, that they  
13 actually had him identified as a 19 year old?

14 A. At which point?

15 Q. At this point when this note was entered.

16 A. I wasn't an employee at this point.

17 Q. Okay.

18 A. So I --

19 Q. Is that something Megan would know?

20 A. She would know.

21 Q. Okay. And then if you turn with me to page  
22 16. And for the date 11/13/2015 that begins at  
23 client's vaccination records; do you see that?

24 A. Yes.

25 Q. And that's something that you already

1 discussed on direct examination --

2 A. Yes.

3 Q. -- is that correct?

4 A. Uh-huh.

5 Q. And do you know whether or not as of this  
6 date, November 13th, 2015, the District was still  
7 under the impression that Qasin was 19?

8 A. I don't know.

9 Q. You don't know. Now, if you would turn with  
10 me please to the document that's been tabbed 53,  
11 Exhibit 53. And I believe that we've seen this  
12 document. It's Bates stamped 455; do you see that?

13 A. Yes.

14 Q. And under the second text at the bottom of  
15 the page it's an email from Timothy Purcell (ph) and I  
16 think -- how did you identify him previously?

17 A. How did I what? Sorry.

18 Q. Identify Mr. Purcell.

19 A. Tim Purcell?

20 Q. Yes, how do you know Timothy Purcell?

21 A. He's an employee at Lutheran Refugee  
22 Services.

23 Q. Okay. And what was his position?

24 A. He was a case manager for the employment  
25 program.

1 Q. Okay. Is that something different than a  
2 case worker?

3 A. Case manager, case worker, same thing.

4 Q. Okay. Not a higher level of -- a supervisor  
5 or anything?

6 A. There are different ways of describing that.  
7 Essentially, he did employment services for clients.

8 Q. Okay. So that was something similar to what  
9 you did?

10 A. No.

11 Q. I thought you said that you also performed  
12 employment services for clients.

13 A. Yes, I oversaw the programs.

14 Q. Okay. But he was not equal to you because  
15 you were a manager and he was --

16 A. Correct.

17 Q. -- a case manager.

18 A. Yes.

19 Q. Okay. In any event, in this email -- I'm  
20 going to direct your attention to the paragraph that  
21 begins "As usual, we tried to enroll him." Do you see  
22 that?

23 A. Yes.

24 Q. And they have him identified as age 17; do  
25 you see that?

1 A. Yes.

2 Q. Do you know whether or not the District was  
3 still under the impression that Qasin was 19?

4 A. I can't say what the District's impression  
5 was.

6 Q. Okay. Is that because you had no  
7 discussions with them at that time?

8 A. It's because they didn't share that  
9 information with me and that would be information they  
10 have, not me.

11 Q. Okay. Did you ask for it?

12 A. That wasn't something that was brought up so  
13 when it did become an issue later on, we addressed it.

14 Q. Do you know whether or not the District  
15 asked for a meeting with Tim and the TANF case worker  
16 and who would have that been?

17 A. At Lutheran Refugee Services there was an  
18 interim period where there was none so Tim was having  
19 meetings with the County's assistance office and  
20 that's how he became involved in this but that wasn't  
21 his official role.

22 Q. Okay. So are you aware that Tim and someone  
23 from the TANF office, together with Qasin and Faisa,  
24 Amber Hilt, and Jack Blackman, did you know that a  
25 meeting was attempted to be scheduled for the purpose

1 of having a discussion about getting Qasin enrolled at  
2 this time?

3 A. If it was prior to my working there, then  
4 no.

5 Q. If it was prior to your having come on this  
6 case.

7 A. Correct.

8 Q. Okay. Do you know that -- did Megan ever  
9 tell you that the purpose for that meeting was to get  
10 a plan to enroll Qasin?

11 A. Of which meeting, the one that they're  
12 discussing with --

13 Q. Yes.

14 A. Yes.

15 Q. Okay. So in December of 2015 the District  
16 was inquiring of your organization and the folks at  
17 the county for some agreed upon methodology to get  
18 Qasin in school, right?

19 A. There was discussions.

20 Q. Okay. Now, if we look at the document Bates  
21 stamped 23.

22 A. Tab 23?

23 Q. No, not Tab 23. The document Bates stamped  
24 23 in Exhibit 54. I apologize for the confusion.

25 A. That's the one that wasn't in mine so -- 53?



1 Q. 23. So it's document -- it's a document  
2 that's been tabbed 54 and it's been Bates stamped 23.

3 A. And that was the one that was missing  
4 earlier.

5 Q. Were they able to accommodate you?

6 A. Yes, I believe it was at the end of 53; is  
7 that what it was?

8 MR. WALCZAK: It was at the end of 52,  
9 the last three pages of 52. Just to be sure, it's 22,  
10 23, 24 at the bottom.

11 THE WITNESS: Okay. I'm there.

12 BY MS. O'DONNELL:

13 Q. Okay. And again, I'm going to redirect your  
14 attention to an email that you've already seen and  
15 testified about. This is the one at the top of the  
16 page from Timothy Purcell to Amber Hilt and it's dated  
17 December 30th of 2015; do you see that?

18 A. Yes.

19 Q. Okay. In this email Tim is speaking to  
20 Amber directly and says, "Thanks so much for talking  
21 to  
22 Mr. Blackman. I'm wondering what the options are  
23 since there was discrepancy in the date of birth  
24 between what our office had and what you guys had."  
25 Do you see that?

1 A. Yes.

2 Q. Okay. Did this email ever come to your  
3 attention concerning the discrepancy in Qasin's date  
4 of birth?

5 A. Did I see this email? Yes. Did we have  
6 issues with the date of birth discussed? I wasn't  
7 part of that.

8 Q. Okay. So you don't know one way or another  
9 whether this issue was finally resolved --

10 A. No.

11 Q. -- because of Qasin's date of birth, right?

12 A. No, but even at the age of 19, he would have  
13 still been eligible for public education.

14 Q. So that would segue into the next question  
15 that I have for you. If you look down into the next  
16 paragraph, I believe you read for Mr. Walczak that  
17 says, "I'm talking with a resettlement case worker and  
18 they stated that literacy council option would count  
19 as school." Do you see that?

20 A. Yes.

21 Q. Okay. Now, as a 19 year old, are you aware  
22 that Mr. Blackman discusses pathway options for  
23 children who are 19 to 21 years old who are just  
24 entering school?

25 A. Yes.

1 Q. Okay. And are you aware that Mr. Blackman  
2 also suggests literacy council and GED as being a  
3 pathway that a student may choose to take in the event  
4 he chooses not to attend a high school setting. Are  
5 you aware of that?

6 A. Yes, we discussed that in the conference  
7 call to which I replied that a GED without support and  
8 ESL classes is not the same as a high school.

9 Q. So are you aware that the literacy council  
10 would not provide any of their clients with support?

11 A. There are support systems for GED and I know  
12 through other clients that did go through that but  
13 it's not the same as a high school support system.

14 Q. Are you aware of whether or not Mr. Blackman  
15 discussed other avenues for Qasin other than high  
16 school believing that he was 19 years old?

17 A. At which point?

18 Q. At this point, December 30th of 2015, up to  
19 this point in time.

20 A. What happened prior to my involvement, I  
21 don't know, but during the conference call I can  
22 attest to the fact that they stated that he didn't  
23 seem interested based on body language and that they  
24 were suggesting literacy council for ESL and a GED  
25 pathway without follow up from the District or we

1 pushed for the high school.

2 Q. And your belief is that -- well, strike  
3 that. Did you confront or speak with Qasin about his  
4 body language at that meeting?

5 A. Yes.

6 Q. And did you agree with the District  
7 representatives that as a person who was interested in  
8 attending school he should have been sitting at the  
9 table with his family and other representatives to  
10 meet with the school district representatives in order  
11 to get him enrolled?

12 A. I did ask what occurred at that meeting and  
13 he said that at some point in time Mr. Blackman was  
14 very rude and flippant and slammed the door on him.  
15 So that could have contributed to that interaction but  
16 I don't know.

17 Q. Do you know whether Mr. Blackman left the  
18 table after Qasin refused to sit down?

19 A. No, I don't know.

20 Q. Did you ask anyone whether Mr. Blackman was  
21 offended by Qasin's lack of interest in enrolling in  
22 the school district and his body language?

23 A. Perhaps, however, even if I'm offended by  
24 someone who's a community partner, if I have a job and  
25 a role to perform, I still have an obligation to do

1 so.

2 Q. So if Qasin never set down at the table and  
3 turned his head away and refused to engage in any  
4 discussion with an interpreter, would that suggest to  
5 you that he was being a willing participant as a  
6 community partner to get himself enrolled in school?

7 A. I don't know whether the door slamming  
8 occurred before or after that.

9 Q. Now, I'd like to direct your attention to  
10 the Day 1 binder and specifically Exhibit 16. Back to  
11 this email where you were not present or copied on it,  
12 but you indicated that this became a source of  
13 contention between Lutheran Refugee Services and the  
14 School District of Lancaster; is that correct?

15 A. Yes.

16 Q. Okay. Did you eventually -- did you  
17 participate in a meeting subsequent to this email  
18 having been sent to Balal Altman (ph)?

19 A. Yes.

20 Q. Okay. And at that meeting, did Mr. Blackman  
21 say to Balal in your presence that he apologized that  
22 this email was sent to him?

23 A. Balal wasn't at that meeting.

24 Q. Okay. How about Madav (ph), was Madav at  
25 that meeting?

1 A. Madav was at that meeting.

2 Q. And Madav was not interesting in Mr.  
3 Blackman's apology, was he?

4 A. I can't speak on his behalf.

5 Q. Did you see him? Did you hear him?

6 A. I did hear the interaction between the two  
7 of them.

8 Q. What did Madav have to say?

9 A. Madav was disappointed in that type of  
10 interaction and was upset with that.

11 Q. Did Mr. Blackman explain that this had  
12 nothing whatsoever to do with Khadija Issa (ph) and  
13 was not intended for him whatsoever?

14 A. He didn't say whether or not it had to do  
15 with Khadija Issa but it does follow that email  
16 thread.

17 Q. So simply by virtue of the fact that it was  
18 placed on this email thread and explained to Balal and  
19 to Madav that it had nothing to do with Khadija and/or  
20 your agency, Madav was still not willing to accept the  
21 apology of  
22 Mr. Blackman?

23 A. I don't think it was refusal or acceptance  
24 of an apology. It was a discussion and I don't  
25 believe that

1 Mr. Blackman at any point stated that this was or was  
2 not pertaining to Khadija. The only thing he stated  
3 was this email was not intended for Balal.

4 Q. And Madav said that he did not want an  
5 apology for Balal; is that correct? He said he would  
6 not hold grudges and he wants to move past it; is that  
7 correct?

8 A. The grudge part, I don't recollect that.

9 Q. Why are we still talking about it today?

10 A. Because if it has an effect on the  
11 enrollment of students then that's why we're talking  
12 about it.

13 Q. We talked a little bit about this  
14 conference, January 4th of 2016.

15 A. Yes.

16 Q. You indicated that there were barriers. You  
17 talked about refugees having barriers; is that  
18 correct?

19 A. Yes. Yes.

20 Q. Okay. Are you aware of whether or not the  
21 Phoenix Academy offers counseling to its students and  
22 particularly its refugee students in order to help  
23 overcome those barriers?

24 A. I believe they may or may not have one. I -  
25 -

1           Q.    Well, what does that mean, yes or no?  You  
2 believe they may or may not.

3           A.    I don't remember what was said, whether or  
4 not they had a full staffed counselor for Phoenix  
5 Academy.

6           Q.    We learned from your direct testimony though  
7 you're a very good researcher and you were able to  
8 find law and all sorts of other things to help your  
9 client and to advocate.  Did it ever occur to you that  
10 perhaps you might look at the curriculum and see  
11 what's being offered to your clients in order to help  
12 advocate for them to stay in school?

13          A.    When you're trying to look for stuff and the  
14 school district is not very forthcoming then you can't  
15 access that information, one.  And when I spoke about  
16 barriers, I'm speaking of barriers that any individual  
17 who's coming from a war torn country gets off of a  
18 plane, gets bombarded with a whole bunch of different  
19 things and goes to a million different appointments  
20 would face along with cultural and language,  
21 religious, and gender barriers.  And I use all of  
22 those to discuss why perhaps maybe his language or  
23 body language may not have been positive on that  
24 particular day.

25          Q.    Ms. Chesson, isn't it true that any student



1 who has an interrupted education with a difficult  
2 background could present the same way?

3 A. Correct.

4 Q. Okay. So barriers in terms of what you're  
5 talking about could be relative to any student  
6 regardless of their national origin or their religion  
7 or anything else. If a student has some sort of a  
8 hesitation about speaking with adults, his or her body  
9 language could be the same as Qasin's; is that  
10 correct?

11 A. Correct.

12 Q. All right. Now, you also indicated that you  
13 felt that it was difficult for a student to get  
14 anywhere to get a job without a high school diploma or  
15 I believe you called it a high school degree; is that  
16 correct?

17 A. Yes, it's very hard for individuals to get  
18 one that they can support families on, yes.

19 Q. And do you believe Qasin should be in  
20 school?

21 A. If that's the choice that he wants to make,  
22 yes. I believe that would open more opportunities for  
23 him.

24 Q. And do you believe that a high school  
25 degree, regardless of whether he gets a diploma or a

1 GED, is going to help him advance in his life here in  
2 the U.S.?

3 A. Yes, a high school degree would. A GED  
4 would, as well. But there are differences between  
5 those two.

6 Q. Did you know that School District of  
7 Lancaster will substitute out a GED certificate for a  
8 high school diploma after one year after the student  
9 obtains the GED?

10 A. No.

11 Q. Okay. As a friend of the Hassan family,  
12 would you be willing to tell Qasin that he is able to  
13 obtain a GED and transfer it for -- and exchange it  
14 for a School District of Lancaster diploma?

15 A. Sure. I'm sure there's lots of friends here  
16 that would be able to tell him that information.

17 Q. You understand that Qasin hasn't been back  
18 to school since sometime in March of this year, don't  
19 you?

20 A. Yes.

21 Q. And you understand that at this point he's  
22 probably legally truant?

23 A. That's possible.

24 Q. Okay. And you understand that Qasin has not  
25 agreed to withdraw but he hasn't come to school

1 either; is that correct?

2 A. Correct.

3 Q. And is that because he's holding out because  
4 he wants to go to McCaskey and not Phoenix?

5 A. Very possible. I can empathize with that  
6 family. If a school told me that my child who is  
7 being bullied, that they were making bogus accusations  
8 and they weren't supported academically, I don't know  
9 that I would necessarily want my child there either.

10 Q. I understand that you attended an  
11 orientation at Phoenix. Did you attend an orientation  
12 at McCaskey?

13 A. No.

14 Q. Do you have any idea what those students are  
15 told on the first day?

16 A. No.

17 Q. Do you have any idea that school resource  
18 officers do handcuff, arrest, and put to the floor any  
19 student they feel needs to have that treatment  
20 including girls?

21 A. I do know other individuals from the  
22 community who have attended McCaskey and after hearing  
23 what goes on and what was presented at Phoenix  
24 Academy, they and others who have had that experience  
25 have stated that it's a very different environment.

1 So whether or not there's a resource officer in a very  
2 serious situation who handcuffs a student occurs, that  
3 may very well be, but it may not have been presented  
4 on day one at orientation but that's part of their  
5 school.

6 Q. And you don't know that, right, because you  
7 never attended McCaskey.

8 A. I did not attend McCaskey.

9 Q. Okay. Now, you indicated that you felt that  
10 there were patterns of enrollment denial within the  
11 School District of Lancaster's system; is that  
12 correct?

13 A. Yes.

14 Q. And you know that because you had three  
15 clients who had difficulty or hiccups getting into the  
16 school district; is that correct?

17 A. No. That's not how I know that.

18 Q. How many clients have you had that couldn't  
19 get into the school district of Lancaster?

20 A. Myself is mostly the clients that are in  
21 this case among others.

22 Q. And how many students has Lutheran Refugee  
23 Services placed over the last three years?

24 A. I can't tell you that number off the top of  
25 my head.

1 Q. If Megan Brown testified that a total of 15  
2 have been placed in the past five years, would you  
3 disagree with those numbers?

4 A. It's possible.

5 Q. Are you aware of whether or not Church World  
6 Services had any difficulty enrolling their students?

7 A. Yes.

8 Q. Okay. And who was the case worker who  
9 identified a problem for you?

10 A. Several, but it wasn't the case workers who  
11 told me, it was their director at Church World  
12 Services.

13 Q. And who is that?

14 A. Sheila.

15 Q. That's Sheila. We talked to her before.  
16 Now, we talked a little bit about Khadija and that she  
17 has some sort of a barrier where she can't ask for  
18 what she needs; is that correct? Was that your  
19 testimony?

20 A. That wasn't the way I said it, no.

21 Q. Sure. I believe you said that she has  
22 religious barriers or gender barriers and she can't  
23 ask or she doesn't feel like she can ask for what she  
24 needs; is that true?

25 A. We were referencing the fact that females

1 cannot bring in feminine hygiene products and you had  
2 asked me whether or not she could ask for them and I  
3 presented reasons why that would be very uncomfortable  
4 for her.

5 Q. You said religious or gender barriers.

6 A. Yes.

7 Q. So my question is what religious barrier  
8 does Khadija have that would prevent her from asking  
9 for something that she needed whether she was at  
10 school or the supermarket?

11 A. There are certain things about your own  
12 intimate body or sexuality that are not discussed in  
13 certain religions openly, especially not with someone  
14 of the other sex.

15 Q. Do you know whether or not Khadija asked for  
16 an exception or accommodation for religious purposes  
17 in terms of asking for things that she needs?

18 A. I don't know that she would have had someone  
19 that she could go to to ask that, no.

20 Q. Are you her advocate?

21 A. I have advocated for her, yes.

22 Q. And you know that she had this religious  
23 barrier where she can't ask for things on her own?

24 A. I know what religion she is. I know her  
25 personally. I know how she acts around certain people

1 when they ask certain questions. I can see how she's  
2 uncomfortable. I can see how my own daughter, who was  
3 born in the United States, would be uncomfortable  
4 asking for that and I don't think that that's  
5 something that's okay to do.

6 Q. Do you think that there are female  
7 professionals at the Phoenix Academy and within the  
8 School District of Lancaster that are sensitive to the  
9 needs of young girls?

10 A. Probably.

11 Q. Okay. And as her advocate, were you able to  
12 transition Khadija into one of those female  
13 administrators or personnel who would be able to help  
14 her out with those things?

15 A. I believe that's something the school  
16 district would have to provide.

17 Q. Okay. So you didn't do that, did you?

18 A. The school district, it's their  
19 responsibility.

20 Q. Okay. Thank you. And any other barriers  
21 that you think Khadija might have in terms of  
22 navigating her way around the Phoenix Academy?

23 A. Language.

24 Q. Okay. And do you know whether or not she  
25 receives counseling services as well at the Phoenix

1 Academy through their programming?

2 A. I don't know.

3 Q. Okay. Did you ask?

4 A. No.

5 Q. Is it true that you did not attend the last  
6 follow up meeting on Qasin's case because your agency  
7 had closed?

8 A. Yes.

9 Q. Okay. And as his friend/advocate, you still  
10 didn't attend?

11 A. I don't believe it was Qasin's case. I  
12 believe it was the District issues, the meeting that  
13 we had with  
14 Dr. Rahl (ph) that she said she was going to have a  
15 follow up meeting with. So it was meetings to discuss  
16 general issues with the District.

17 Q. But you didn't attend that one?

18 A. No.

19 Q. Okay. Lastly, you were aware that Dr. Rahl  
20 advised you during the meeting that you had attended  
21 that the school district had just undergone and  
22 extensive ASL evaluation by one of its own  
23 consultants?

24 A. Yes.

25 Q. Okay. And she agreed that there were



1 problems in both McCaskey and Phoenix?

2 A. Yes.

3 Q. Okay. And she was working very hard to get  
4 those problems resolved?

5 A. She said that's what was on her agenda.

6 Q. Thank you.

7 MS. O'DONNELL: Those were all the  
8 questions I have.

9 THE COURT: Thank you very much,  
10 Counselor.

11 Attorney Walczak, do you have any  
12 redirect?

13 MR. WALCZAK: I have no questions, Your  
14 Honor. Thank you.

15 THE COURT: You're welcome. Thank you,  
16 sir.

17 Ma'am, thank you very much. You've  
18 been on the stand for a long time but you may now step  
19 down.

20 THE WITNESS: Thank you.

21 THE COURT: And Counsel, it is now  
22 approximately 12:44 p.m. Why don't we stand in recess  
23 for lunch until 2:00 and start back up at that time?

24 MR. WALCZAK: Thank you.

25 THE COURT: Thank you.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

THE CLERK: All rise.  
(AM proceedings concluded at 12:16 p.m.)

\* \* \* \* \*

CERTIFICATION

I, Sheila G. Orms, certify that the  
foregoing is a correct transcript from the official  
electronic sound recording of the proceedings in the  
above-entitled matter.

---

SHEILA ORMS, APPROVED TRANSCRIPTIONIST

Dated: August 18, 2016

<b>&amp;</b>	<b>1315</b> 1:15	129:17 131:18	117:17,20 121:8
<b>&amp;</b> 2:3	<b>13th</b> 28:12 109:1,6 115:15 125:6	<b>2016</b> 1:4 39:3 60:15 135:14 146:15	129:8,9
<b>0</b>	<b>14</b> 23:21	<b>21</b> 45:9 47:23 60:15 130:23	<b>53</b> 30:7 36:23 116:6 117:17,20 125:10 125:11 128:25 129:6
<b>03881</b> 1:3	<b>15</b> 24:17 26:2 71:5 89:2,8 97:15 109:15 141:1	<b>21st</b> 52:5 58:2 61:15	<b>54</b> 34:2,3,7,9 35:4,6 38:14 116:6 117:17 117:20 128:24 129:2
<b>1</b>	<b>15213</b> 1:21	<b>22</b> 34:11,21 35:2,9 38:14,23 129:9	<b>55</b> 81:3,7,12 116:6 117:17,20
<b>1</b> 46:20 53:10,12 55:18,18 67:24 81:4 121:17 133:10	<b>16</b> 3:11 17:10 26:13 53:20 55:14,22 116:7 117:17,20 124:22 133:10	<b>23</b> 34:11,21 35:2,9 36:5,25 128:21,22 128:23,24 129:1,2 129:10	<b>56</b> 99:12 116:6 117:17,21
<b>1-888-777-6690</b> 1:25 2:25	<b>16th</b> 61:13 66:12	<b>24</b> 34:11,21 35:2,9 36:10 129:10	<b>57</b> 102:17 116:6 117:17,21
<b>1/1</b> 67:24	<b>17</b> 1:4 17:9,11 23:4 28:15 32:8 126:24	<b>252</b> 110:15	<b>58</b> 3:13 108:4,11 116:6 117:18,21
<b>10</b> 97:15	<b>17011</b> 2:4	<b>26</b> 3:12 113:20,23 114:1 116:7,12,13 116:14 117:13	<b>5:16</b> 1:3
<b>10/19</b> 23:22	<b>17th</b> 30:18 69:13 70:19 84:5 107:6	<b>28th</b> 61:23	<b>5th</b> 89:23 90:20
<b>10/23</b> 24:8,18,23	<b>18</b> 33:16,18 49:22 120:24 146:15	<b>2:00</b> 145:23	<b>3</b>
<b>100</b> 2:3 33:16 62:16 74:3	<b>1800</b> 1:24 2:24	<b>3</b> 78:5	<b>6</b>
<b>10th</b> 28:11 30:1 40:17 94:14 95:11	<b>1801</b> 1:24 2:24	<b>3000</b> 1:12	<b>60173</b> 1:18
<b>11</b> 18:19	<b>18th</b> 1:12	<b>30th</b> 36:7 37:24 129:17 131:18	<b>7</b>
<b>11/10</b> 26:14	<b>19</b> 92:7,8 124:13 125:7 127:3 130:12 130:21,23 131:16	<b>313</b> 1:21	<b>7</b> 16:13,19 47:19 78:5 121:14
<b>11/10/15</b> 25:21	<b>19102</b> 1:18	<b>3:30</b> 58:3	<b>7th</b> 103:19 107:2,15
<b>11/13</b> 27:9	<b>19103</b> 1:13,22,24 2:24	<b>4</b>	<b>8</b>
<b>11/13/2015</b> 124:22	<b>19107</b> 1:16	<b>40</b> 3:12 46:23 47:12 54:16 61:2,6,7 116:7 117:17,20	<b>8/9/16</b> 47:14
<b>11/9</b> 26:2	<b>1998</b> 17:1 121:17	<b>400</b> 1:15	<b>80</b> 78:6 80:1
<b>11/9/15</b> 25:20	<b>1:06</b> 109:15	<b>455</b> 125:12	<b>8th</b> 94:13
<b>117</b> 3:11,12,12,13	<b>1st</b> 17:1	<b>468</b> 102:24	<b>9</b>
<b>118</b> 3:3	<b>2</b>	<b>473</b> 109:14	<b>9/11</b> 21:21 22:17
<b>11:24</b> 89:11	<b>2</b> 9:12 13:2 47:21,22 49:18 53:9,23 55:18 81:4,5	<b>474</b> 108:10,13,14,24	<b>9/9</b> 19:17
<b>11:37</b> 30:24	<b>20</b> 71:5 92:7,8	<b>4th</b> 38:19 39:2 86:2 135:14	<b>90</b> 8:11,11,14 12:3 18:22 48:21 60:18
<b>11th</b> 29:25 62:2 66:9 69:4 86:4	<b>2006</b> 109:15	<b>5</b>	<b>94</b> 13:14,15
<b>12</b> 3:11 22:16,16 108:11 123:21	<b>201</b> 2:4	<b>5</b> 3:3	<b>9:32</b> 1:5
<b>12/1</b> 28:17	<b>2015</b> 6:10 20:20 22:17 23:23 24:8,18 26:2,14 28:8,12,17 29:16 125:6 128:15	<b>52</b> 3:11,13 10:17 12:19,22,23 18:20 34:25 35:4 116:6	<b>9:38</b> 10:2
<b>12/10</b> 28:8			<b>9:42</b> 37:2
<b>12/10/15</b> 27:15			<b>9:45</b> 10:2
<b>12/11</b> 29:16			<b>9th</b> 20:20 94:13 95:11 122:2,16
<b>12:07</b> 31:2			
<b>12:16</b> 146:2			
<b>12:43</b> 1:5			
<b>12:44</b> 145:22			
<b>12th</b> 108:17,22			

<b>a</b>	<b>access</b> 45:10 65:19 68:4,5 136:15 <b>accommodate</b> 129:5 <b>accommodation</b> 142:16 <b>accompany</b> 69:14 <b>accord</b> 82:20 <b>accurate</b> 68:7 <b>accurately</b> 23:9 <b>accusations</b> 139:7 <b>achieve</b> 80:13 <b>acknowledged</b> 63:2 63:17,18,19 <b>acknowledgement</b> 88:5 <b>acl</b> 116:14 <b>aclu</b> 1:17,20 83:24 114:4 117:8 <b>acquired</b> 45:22 <b>acquisition</b> 42:8 66:21 75:2 <b>acronym</b> 7:10 23:11 <b>acting</b> 120:13,16 <b>action</b> 43:12 86:23 <b>actively</b> 58:13 <b>activity</b> 19:9 <b>acts</b> 142:25 <b>actual</b> 54:6,14,24 120:1 <b>added</b> 53:13 <b>additional</b> 25:16,19 <b>address</b> 107:16 <b>addressed</b> 115:3 127:13 <b>adjust</b> 23:8 <b>administered</b> 4:21 <b>administrators</b> 143:13 <b>admissible</b> 56:15 <b>admitted</b> 12:22 117:18 <b>adults</b> 137:8 <b>advance</b> 138:1 <b>advised</b> 144:20	<b>advocacy</b> 44:24 83:22 92:15 120:3,5 <b>advocate</b> 49:12 58:23 62:10 87:25 91:3 102:3 111:20 120:8,11 136:9,12 142:20 143:11 144:9 <b>advocated</b> 142:21 <b>advocating</b> 49:5 65:21 80:7 <b>affect</b> 32:4 106:18 <b>afternoon</b> 109:1 118:7 <b>age</b> 7:24 17:10 18:12 20:7,10 29:22 32:3 33:11,15 45:9 65:8 65:20 124:8,12 126:24 130:12 <b>aged</b> 97:20 <b>agencies</b> 83:1 <b>agency</b> 7:3 8:14 12:2 13:11 16:10 19:6 21:5 22:23 33:1 44:21 57:13 58:19 59:5,9,17,19,21,22 64:21 67:21 68:11 68:14,20 90:4 93:23 96:11 99:20 112:20 119:2 120:7,11,13 121:25 122:24 134:20 144:6 <b>agency's</b> 43:22 <b>agenda</b> 145:5 <b>agents</b> 58:17 <b>aggressively</b> 105:10 <b>ago</b> 12:13 <b>agree</b> 132:6 <b>agreed</b> 86:16 128:17 138:25 144:25 <b>ah</b> 34:21 <b>ahmed</b> 12:12 23:2,4 24:25 25:2,15,20 28:17,20 29:1	<b>ahmed's</b> 26:16 <b>aid</b> 95:23 96:5,14 <b>airport</b> 19:19 <b>al</b> 1:3 50:23 <b>allegation</b> 107:24 <b>allegations</b> 85:11 111:2 <b>alleged</b> 109:7 <b>allentown</b> 1:5 <b>allow</b> 48:8 71:7 117:11 <b>allowed</b> 42:25 51:20 77:25 101:7,8 <b>allowing</b> 51:25 <b>allows</b> 67:12 <b>alternative</b> 75:24 <b>altiemy</b> 35:21 <b>altiman</b> 133:18 <b>amber</b> 31:11,12 33:20 35:19 36:7 37:7 38:15 39:8 49:16 52:19 53:9 54:17 61:3 62:11 91:14 92:22 93:6,7 94:5 103:25 127:24 129:16,20 <b>amount</b> 19:11 <b>answer</b> 52:20 89:8 121:5 <b>anthropology</b> 6:1 <b>anxiety</b> 23:6 <b>anybody</b> 70:12 79:11 83:18 <b>apologies</b> 9:21 10:11 35:5 <b>apologize</b> 128:24 <b>apologized</b> 133:21 <b>apology</b> 134:3,21,24 135:5 <b>apparently</b> 9:12 24:8 25:23 31:16,18 35:15 48:2 63:6 <b>appear</b> 17:20 30:20 40:9 48:3 52:19 71:7
----------	--	--	---

<b>appearances</b> 1:9 2:1 <b>appears</b> 30:10 38:14 52:25 53:4 58:12 <b>appliances</b> 23:15 <b>applicant</b> 12:12 <b>application</b> 25:14 94:22 95:22 96:11 96:23 97:5 <b>appointment</b> 23:25 24:2,6,20 25:18,20 25:21 26:9 27:14 28:8 <b>appointments</b> 136:19 <b>appreciated</b> 32:17 <b>approach</b> 5:6 67:1 108:15 <b>appropriate</b> 56:22 63:19 87:21 <b>approved</b> 146:13 <b>approximately</b> 145:22 <b>april</b> 88:15 89:23 90:20 97:17,17 98:5 98:8 103:19 107:15 108:11,17 109:1,6 109:15 112:13 113:3,3 114:21 <b>arabic</b> 70:15 100:15 113:16 123:6,13 <b>arch</b> 1:12 <b>area</b> 95:18 <b>areas</b> 63:3 86:23 <b>argument</b> 56:17 <b>arguments</b> 41:18 <b>arm</b> 74:1 <b>army</b> 50:8 <b>arranging</b> 30:13 <b>arrest</b> 139:18 <b>arrival</b> 17:3,18 <b>arrived</b> 19:19 20:19 <b>arrives</b> 8:9 16:11 <b>arthur</b> 109:15 <b>articulated</b> 39:17	<b>asharoff</b> 14:24 <b>asked</b> 22:7 53:23 65:4 69:10 71:9,19 71:23 73:5,19,21 74:10 78:17 79:23 80:9 87:23 88:9 89:22 93:25 95:10 95:21 111:14 127:15 142:2,15 <b>asking</b> 17:4 50:19 52:9,10 90:18 93:23 142:8,17 143:4 <b>asks</b> 36:18 52:7 <b>asl</b> 144:22 <b>assigned</b> 68:11 <b>assist</b> 94:23 96:10 <b>assistance</b> 7:6,8,23 20:5 31:22 32:1 36:17 49:1 96:12,13 96:14,22,23 97:8 98:24 127:19 <b>assisting</b> 115:25 <b>assume</b> 87:8 <b>assured</b> 23:7 <b>atlantic</b> 1:23 2:23 <b>attempted</b> 28:23 127:25 <b>attempting</b> 81:25 <b>attempts</b> 90:24 <b>attend</b> 7:25 22:3,11 27:20 39:1,19 41:24 84:8 88:15 92:11 100:21,22 101:15 102:10 103:15,16 131:4 139:11 140:8 144:5,10,17 <b>attendance</b> 40:4 <b>attended</b> 40:20 89:23 103:21 139:10,22 140:7 144:20 <b>attending</b> 27:12 132:8 <b>attention</b> 8:2 20:2,3 23:22 26:13 28:16	30:6 48:17 98:9 99:19 123:20 126:20 129:14 130:3 133:9 <b>attest</b> 131:22 <b>attorney</b> 12:18 116:8 117:24 145:11 <b>attorneys</b> 116:16 <b>atwood</b> 1:21 <b>august</b> 1:4 146:15 <b>aura</b> 101:12 103:24 <b>authentic</b> 56:13 <b>authorities</b> 68:7 <b>authority</b> 68:1 <b>authorization</b> 75:16 76:4 <b>availability</b> 36:18 <b>available</b> 27:14 28:7 96:5,8,9 119:12 <b>avenues</b> 67:2 95:14 131:15 <b>aware</b> 8:21 124:11 127:22 130:21 131:1,5,9,14 135:20 141:5 144:19	53:2,9 55:25 57:21 58:3,16,22 59:11 60:17 61:3,9 63:6 70:13 71:9 79:13 <b>balahl's</b> 54:17 <b>balal</b> 133:18,21,23 134:18 135:3,5 <b>ballal</b> 103:22 <b>banging</b> 105:2 <b>barrier</b> 23:6 141:17 142:7,23 <b>barriers</b> 41:25,25 42:1,21 64:19,23 76:9,10,10,10 105:9 106:16,17 135:16 135:17,23 136:16 136:16,21 137:4 141:22,22 142:5 143:20 <b>based</b> 51:13,13 58:10 131:23 <b>basic</b> 59:23 119:10 <b>basically</b> 76:22 <b>basis</b> 56:4 60:11 63:24 <b>bates</b> 34:10 121:14 123:21 125:12 128:20,23 129:2 <b>bathroom</b> 105:2 <b>becky</b> 72:8 77:14 <b>beginning</b> 49:18 61:25 <b>begins</b> 110:10 123:25 124:22 126:21 <b>behalf</b> 49:5 88:16 89:24 92:16 102:3 114:6 116:1 120:5,7 120:7,11,13 134:4 <b>behavior</b> 69:24 70:8 71:21,22 73:5,7 76:24 <b>behavioral</b> 70:3 <b>belief</b> 59:5 132:2
		<b>b</b>	
		<b>b</b> 3:8 <b>back</b> 31:16 33:23 34:17 36:25 38:19 38:23 52:3 58:16 61:5 72:3 73:11,14 74:3 77:17 94:1 95:3 98:5,6,9 100:9 100:17 101:19 114:24 117:11 121:8 133:10 138:17 145:23 <b>background</b> 5:25 6:14 32:9 137:2 <b>backwards</b> 116:7 <b>balahl</b> 35:21,25 47:11,23 49:16 50:4 50:19 52:5,18,19	

<p><b>believe</b> 17:10 30:22 31:13 33:14 37:12 38:2,6 44:9 50:8 51:5 60:10 61:24 62:15 77:24 78:5 84:7 86:2 87:11 88:20 89:6 92:7 95:19 96:11 99:9 101:12 102:8,12,22 102:24 113:12 120:10 121:8 122:10 125:11 129:6 130:16 134:25 135:24 136:2 137:15,19,22 137:24 141:21 143:15 144:11,12</p> <p><b>believes</b> 122:11</p> <p><b>believing</b> 131:16</p> <p><b>beneath</b> 14:5,19</p> <p><b>beneficial</b> 87:16</p> <p><b>benefit</b> 51:4 66:16</p> <p><b>benefits</b> 32:4 48:24 77:5</p> <p><b>best</b> 36:13 87:12</p> <p><b>bethany</b> 118:21 119:1,3,5</p> <p><b>better</b> 42:16 66:25 80:6,20 86:9 93:20 111:20</p> <p><b>beyond</b> 51:17</p> <p><b>big</b> 40:7 42:13 71:2</p> <p><b>binder</b> 10:15 30:7 34:2 45:25 46:3,5 46:14,18,25 47:4,7 55:14,16,18 81:3 99:13 102:17 108:5 113:19 121:8 133:10</p> <p><b>binders</b> 9:12 55:18</p> <p><b>bio</b> 11:2,12,17 12:25 13:20 18:10 121:9 121:11 123:14</p> <p><b>birth</b> 16:25 17:12 67:24 68:8,9,10,17</p>	<p>121:17,24 122:6,8 129:23 130:4,6,11</p> <p><b>birthdates</b> 67:20</p> <p><b>birthday</b> 122:2,21</p> <p><b>birthdays</b> 67:23</p> <p><b>bit</b> 5:25 6:23 29:4 53:15 68:25 92:23 95:3 135:13 141:16</p> <p><b>black</b> 76:25 77:4,21 78:1</p> <p><b>blackman</b> 27:13,24 28:1 38:18 39:9,10 39:18 40:5,16 49:23 52:12,13 54:8,22 55:25 57:20 58:3 59:1,9 62:12,13 63:5,13,18 91:10,21 91:23 92:13 94:5 103:25 107:22 127:24 129:22 130:22 131:1,14 132:13,17,20 133:20 134:11,22 135:1</p> <p><b>blackman's</b> 134:3</p> <p><b>blank</b> 98:25 99:2</p> <p><b>board</b> 110:14</p> <p><b>body</b> 40:9,12,23,25 41:2,15 42:5 131:23 132:4,22 136:23 137:8 142:12</p> <p><b>bogus</b> 67:19,19,23 139:7</p> <p><b>bombarded</b> 136:18</p> <p><b>born</b> 143:3</p> <p><b>bottom</b> 13:2 16:5,14 21:22 22:16 23:22 23:23 24:18 28:16 30:21 35:1,9 36:6 38:13 47:12,18,19 49:14,15 61:2 102:24 108:11,14 109:14 125:14 129:10</p>	<p><b>box</b> 1:18 14:5 15:5 17:22</p> <p><b>boxes</b> 17:15</p> <p><b>branch</b> 21:4</p> <p><b>brand</b> 76:3</p> <p><b>break</b> 89:3,5</p> <p><b>brief</b> 9:17 97:13 115:6</p> <p><b>briefly</b> 81:20</p> <p><b>bring</b> 9:14 64:1 75:14 76:4 80:4 85:8 93:8 98:8 142:1</p> <p><b>broke</b> 89:22</p> <p><b>brother</b> 25:3,4 28:20 95:6 96:18</p> <p><b>brought</b> 59:19 60:12 63:11,13 64:13 75:19,22 78:11 93:23 98:17,17,18 99:19 112:17,19 113:5 127:12</p> <p><b>brown</b> 9:1 20:3 39:8 90:15,25 91:5 141:1</p> <p><b>brushing</b> 111:1</p> <p><b>buffer</b> 95:1</p> <p><b>building</b> 69:22 70:11</p> <p><b>bullied</b> 139:7</p> <p><b>bullying</b> 85:2,23 98:16 104:7,13,16 104:21,24 105:12 106:23 107:17,18 107:24 109:7 110:1 110:14,19</p> <p><b>bunch</b> 136:18</p> <p><b>burma</b> 90:6 92:5 94:1,10 95:6,12 96:18</p> <p><b>burmese</b> 97:20</p> <p><b>business</b> 12:8 56:15</p> <p><b>busy</b> 19:14</p> <p><b>butterfield</b> 91:15,16 94:25</p>	<p><b>c</b></p> <p><b>c</b> 4:1 5:2</p> <p><b>cairo</b> 13:21,25 14:3</p> <p><b>call</b> 4:3,14 10:4 30:14 39:4,7 42:24 43:2 51:3 69:3 86:2 89:14 99:7 101:2,5 102:9,13 103:5 131:7,21</p> <p><b>called</b> 4:7 6:4 8:24 10:6 11:12 13:14 73:8 83:9 89:16 94:4 99:5 100:11 101:11 102:10 105:3 137:15</p> <p><b>caller</b> 101:6</p> <p><b>calling</b> 5:15</p> <p><b>calls</b> 39:24</p> <p><b>camp</b> 2:4</p> <p><b>campus</b> 95:19</p> <p><b>canada</b> 5:19</p> <p><b>capacity</b> 56:19 115:20</p> <p><b>care</b> 72:1 77:9</p> <p><b>case</b> 4:10 8:7,11,16 8:24 11:3,3,5,16,25 12:1 13:6 14:14 16:22 18:22,23 19:2 19:4,5 20:4,17 21:7 21:10,17 22:4,5 23:13,16 24:1,25 25:18 26:3,16,18 29:9,19,22 31:5 32:11,16 35:23 36:3 37:11,13 38:4 45:20 45:22 50:10 51:11 51:14,20,22 56:4,4 56:10,19 60:18,22 64:4 70:14 83:14 90:25 94:15 117:1,4 123:1 124:4,5,5 125:24 126:2,3,3,17 127:15 128:6 130:17 140:21</p>
--	---	--	---

<p>141:8,10 144:6,11  <b>cases</b> 85:1,10,13,19  85:20  <b>caught</b> 122:14  <b>cause</b> 42:1  <b>caused</b> 67:20  <b>cc'd</b> 30:15 37:4  <b>cease</b> 51:18  <b>center</b> 1:14 2:3  44:20 69:25  <b>central</b> 118:16,23  <b>certain</b> 19:11  142:11,13,25 143:1  <b>certainly</b> 4:19 5:7  9:8 51:2 108:16  <b>certificate</b> 94:3,9,13  138:7  <b>certification</b> 146:5  <b>certify</b> 146:7  <b>chance</b> 73:1 78:23  80:6  <b>change</b> 44:8,10  82:13,24 88:1 93:16  103:8  <b>changes</b> 87:10 88:3  88:5 106:12  <b>changing</b> 82:20  <b>chapter</b> 1:20  <b>checked</b> 29:9  <b>chengs</b> 88:22 90:1,2  90:24  <b>chesson</b> 3:3 4:14,22  5:2,13,13,14,15,16  5:20 10:15 35:8  48:3,5 89:22 118:7  136:25  <b>chief</b> 4:10  <b>child</b> 6:19 20:10  51:10 58:14 117:2  139:6,9  <b>children</b> 7:24 16:17  18:12 20:7 22:10  24:3 32:3 120:21,23  130:23</p>	<p><b>choice</b> 22:13 112:5  121:4,6 137:21  <b>choose</b> 36:13 112:6  131:3  <b>chooses</b> 131:4  <b>chose</b> 121:3  <b>christian</b> 118:21  119:1  <b>chronologically</b>  30:20 90:17  <b>church</b> 87:19  119:17,20,21,23  141:5,11  <b>churchworld</b> 81:16  84:11,12,19 88:2  <b>city</b> 13:21,25  <b>claim</b> 42:5 116:25  <b>clarification</b> 52:10  52:14 98:19  <b>clarify</b> 61:1,9 90:9  90:16  <b>class</b> 80:1,1  <b>classes</b> 27:13 32:14  33:2,12 42:14 54:9  54:13 75:1 78:21  86:10 131:8  <b>classroom</b> 71:2  <b>clean</b> 73:12  <b>clear</b> 15:25 62:25  <b>clearance</b> 6:21  <b>clearances</b> 6:14,19  <b>clerk</b> 4:2,20 10:1,3  89:10,13 146:1  <b>client</b> 8:12 11:18  24:7 27:12 29:12,19  31:23 32:12 48:20  48:22 49:22 50:2,23  52:11 53:24 54:3,11  101:9 102:2 104:15  106:14 111:23  136:9  <b>client's</b> 11:20 29:19  101:22 124:23  <b>clients</b> 7:7,22 22:5  23:14 25:17,19</p>	<p>26:19 32:10 48:16  48:19 55:10 67:10  82:10 88:17 89:25  89:25 98:10 113:5  115:23 116:1  119:13,15,17,20,22  123:25 126:7,12  131:10,12 136:11  140:15,18,20  <b>clinic</b> 25:16 26:9  <b>clinics</b> 26:7  <b>close</b> 115:10  <b>closed</b> 67:3 115:14  144:7  <b>cm</b> 27:11  <b>coa</b> 36:12,16  <b>code</b> 70:9 110:15  <b>coleman</b> 2:3  <b>colleague</b> 70:14  <b>colleagues</b> 43:18  45:15  <b>collect</b> 48:24  <b>collected</b> 11:8,17  <b>college</b> 74:12 94:16  95:9,15,18  <b>color</b> 106:8  <b>column</b> 20:22 21:18  23:24 29:16  <b>columns</b> 20:23  <b>combination</b> 82:8  <b>come</b> 8:1 13:7,23  22:22 23:18 48:17  51:14 64:15 66:25  70:19 71:10 73:21  76:1,3,23 86:9 93:7  98:6,11,13 99:3  100:9,16 104:9  108:22 121:19  122:20 128:5 130:2  138:25  <b>comes</b> 11:8,18 13:15  41:22 68:6 121:24  <b>coming</b> 39:22 67:18  70:23 72:4 73:2  77:17 88:1 105:9</p>	<p>136:17  <b>comment</b> 67:18  118:25  <b>comments</b> 67:15  87:14 102:4  <b>commitment</b> 40:8  <b>commonly</b> 13:13  <b>communicate</b> 66:6  107:12  <b>communicated</b>  68:20  <b>communication</b>  41:25 57:16 58:22  59:25 62:24 63:2  69:1 108:8 112:21  113:14  <b>communications</b>  58:15 115:22  <b>community</b> 33:2  57:17 59:24 60:3  64:18 94:16 95:14  95:18 98:12 105:20  106:19 132:24  133:6 139:22  <b>company</b> 1:23 2:23  <b>compiled</b> 11:25  <b>complain</b> 104:15,18  <b>complained</b> 104:25  <b>complaint</b> 83:15,16  <b>complaints</b> 115:3  <b>complete</b> 32:14  <b>completed</b> 25:14  60:20 78:8,10  <b>completion</b> 85:13  <b>concern</b> 48:23 54:3  60:4,6  <b>concerned</b> 65:6  <b>concerning</b> 130:3  <b>concerns</b> 45:7 56:16  63:25 68:19 84:20  84:22,23,24 85:6,9  103:2  <b>concluded</b> 110:11  146:2</p>
--	--	--	---

<b>concrete</b> 88:11 <b>conducive</b> 60:2 <b>conducting</b> 72:6 <b>conference</b> 30:13 39:4 131:6,21 135:14 <b>conferring</b> 27:7 <b>confirm</b> 35:1 <b>conflict</b> 6:3 <b>confront</b> 71:23 132:3 <b>confrontation</b> 79:4 <b>confrontational</b> 77:8,16 <b>confrontationally</b> 105:10 <b>confusion</b> 128:24 <b>connect</b> 48:24 <b>consequently</b> 110:10,11 <b>consultants</b> 144:23 <b>contact</b> 8:1 35:18 91:4 102:6 <b>contacted</b> 102:14 <b>contd</b> 2:1 <b>contemporaneously</b> 12:5 <b>contention</b> 133:13 <b>continuation</b> 36:21 <b>continue</b> 10:9 60:24 110:16 112:3 115:22 <b>continued</b> 8:13 <b>continuing</b> 4:9 <b>contributed</b> 132:15 <b>controlled</b> 77:13 <b>conversation</b> 74:18 92:15 94:4 <b>cool</b> 73:7 <b>coordinator</b> 27:14 <b>copied</b> 48:3 56:8 116:16 133:11 <b>copy</b> 53:15 54:10 <b>core</b> 78:20	<b>corporate</b> 2:3 <b>correct</b> 14:20 15:6 15:15,18 16:1,18 18:18 20:20 21:19 22:11,12 24:4,5,8 25:25 27:22 28:9,14 28:25 36:8,19 38:25 39:15 40:19,21 41:4 41:5 46:15 50:14 58:5 59:7 64:6,25 65:12 66:1,10 67:11 68:13 70:2,15 72:8 75:23 78:2 94:11 96:15 101:10 102:12 103:9,10 106:5 108:23 109:1 109:12 120:9,10,17 120:22,25 123:7 125:3 126:16 128:7 133:14 135:5,7,18 137:3,10,11,16 139:1,2 140:12,16 141:18 146:8 <b>corrected</b> 41:6 <b>correctly</b> 23:3 26:21 36:14 <b>council</b> 32:13,23,25 33:3,13 37:14 38:5 39:20 42:11 130:18 131:2,9,24 <b>counsel</b> 5:5 35:3 41:4 51:3 88:25 108:16 113:21 114:4 116:15 117:10 145:21 <b>counseling</b> 96:21 135:21 143:25 <b>counselor</b> 38:11 60:24 89:18 95:2 96:24 97:11,12 116:23 117:23 136:4 145:10 <b>count</b> 37:14 38:5,8,9 130:18	<b>counting</b> 97:13 <b>countries</b> 68:2,5 105:24 <b>country</b> 14:6 17:12 19:18 32:9 122:20 122:22 136:17 <b>county</b> 20:5 31:22 32:1 36:17 128:17 <b>county's</b> 49:1 127:19 <b>couple</b> 7:21 38:22 43:2 60:22 61:18 89:24 <b>course</b> 12:8 78:16 <b>court</b> 1:1,23 2:23 4:3,4,7,7,12,15,19 4:23 5:4,7 9:8,16,20 9:22 10:4,5,6,12 12:18,21 34:13,16 34:19,22 35:3 38:10 40:1 41:3,7 46:2,13 46:19,25 47:3,8 48:4,8 51:2,5,13,23 51:25 55:15,19 56:11 57:19,25 58:11 59:12 60:14 60:23 81:4,6 88:25 89:14,15,16 108:16 113:21 116:8,13,23 117:3,5,16,23 118:2 122:11,13 145:9,15 145:21,25 <b>crack</b> 85:17 <b>create</b> 82:24 111:20 <b>credible</b> 110:13,19 110:22 <b>credits</b> 41:13 65:13 80:13 <b>criminal</b> 6:18 <b>cross</b> 3:2 89:3 117:25 118:3,5 <b>cultural</b> 6:1 41:25 42:20 64:18,23 76:9 106:17 136:20	<b>currently</b> 61:10 <b>curriculum</b> 74:7 78:15 80:12 85:2 136:10 <b>cv</b> 1:3 <b>cw</b> 23:7,11,14 123:25 124:3 <hr/> <b>d</b> <b>d</b> 3:1 4:1 <b>darden</b> 99:1,9 <b>data</b> 11:2,8,12,17 13:1,20 16:9,15 18:10 121:10,11 123:14 <b>date</b> 14:6,9,11 16:24 19:7,8 20:24 22:4 24:13,15 25:22 28:10 30:17 37:23 43:10 56:5 68:8,8 68:10,14,17 69:8 84:3 90:22 113:1 114:17 121:16,24 122:6 124:22 125:6 129:23 130:3,6,11 <b>dated</b> 36:7 47:23 108:25 129:16 146:15 <b>dates</b> 67:24 90:21 122:7 <b>daughter</b> 22:2 49:2 143:2 <b>day</b> 9:12 19:14 29:10 31:2 38:16,20 45:25 46:3,4,6,7,8 46:14,18 47:1,3,5,7 48:21 52:18 55:15 78:4 81:4 84:6 99:4 113:19 114:8,9 121:7 122:15 133:10 136:24 139:15 140:4 <b>days</b> 8:11,12,14 12:3 18:22 19:11 60:18
---	---	---	---



<p><b>dead</b> 112:9</p> <p><b>dealing</b> 59:24 96:25</p> <p><b>dear</b> 109:16,25</p> <p><b>december</b> 6:10 8:15 8:20,21,25 28:11 29:25,25 30:18 36:7 37:24 40:17 128:15 129:17 131:18</p> <p><b>decided</b> 22:2 25:7 66:3 93:20</p> <p><b>decision</b> 60:5 63:24 65:22 66:2 70:23</p> <p><b>decisions</b> 56:3 60:11</p> <p><b>defendant</b> 2:2</p> <p><b>defense</b> 116:9</p> <p><b>defined</b> 110:14</p> <p><b>definition</b> 110:1</p> <p><b>degree</b> 6:1,2 42:14 42:21,23 67:1 94:14 95:12 137:15,25 138:3</p> <p><b>delays</b> 44:4 64:8 84:25 96:25</p> <p><b>delivered</b> 112:23</p> <p><b>demeanor</b> 40:9,23 42:5</p> <p><b>demonstrate</b> 40:10 71:25</p> <p><b>demonstrated</b> 72:3</p> <p><b>demonstrating</b> 73:16</p> <p><b>demonstration</b> 72:17,19 73:22</p> <p><b>denial</b> 140:10</p> <p><b>denials</b> 44:4 64:8 84:25</p> <p><b>denied</b> 8:22 29:21 32:8,22 44:7 50:16 50:17 54:4 60:8 63:1 64:5 110:20</p> <p><b>dennehey</b> 2:2</p> <p><b>deny</b> 64:21</p> <p><b>denying</b> 111:3</p> <p><b>department</b> 13:9,11 13:18 16:10 44:25</p>	<p>45:3 68:12 83:4,5 121:22</p> <p><b>departments</b> 83:10</p> <p><b>deposition</b> 118:9 122:18</p> <p><b>depressed</b> 111:19</p> <p><b>depth</b> 74:18</p> <p><b>describe</b> 72:22 81:20 109:7</p> <p><b>described</b> 69:25 78:23,25 110:5 113:10</p> <p><b>describing</b> 73:15 74:5 126:6</p> <p><b>description</b> 70:1 77:12</p> <p><b>designations</b> 15:9</p> <p><b>despite</b> 105:8</p> <p><b>detail</b> 72:22</p> <p><b>details</b> 21:14 78:17 81:22</p> <p><b>detention</b> 69:25</p> <p><b>determinate</b> 42:3</p> <p><b>determination</b> 107:25</p> <p><b>determine</b> 28:6 60:9 82:5 95:22</p> <p><b>determined</b> 42:24 43:1,3 55:4 96:12</p> <p><b>developing</b> 58:12</p> <p><b>difference</b> 42:13 73:13 105:11</p> <p><b>differences</b> 138:4</p> <p><b>different</b> 7:21 13:15 126:1,6 136:18,19 139:25</p> <p><b>difficult</b> 42:21 107:12 137:1,13</p> <p><b>difficulty</b> 105:14 140:15 141:6</p> <p><b>digits</b> 13:4</p> <p><b>diploma</b> 137:14,25 138:8,14</p> <p><b>direct</b> 3:2 5:9 8:2 23:22 24:18 26:13</p>	<p>28:16 30:6 82:22 89:2,5,6 120:19,20 123:20 125:1 126:20 133:9 136:6</p> <p><b>directed</b> 102:4 110:14</p> <p><b>directly</b> 31:10 129:20</p> <p><b>director</b> 57:15 62:5 62:6 63:10 82:21 119:7 141:11</p> <p><b>disagree</b> 141:3</p> <p><b>disappointed</b> 80:17 111:19 134:9</p> <p><b>discovered</b> 44:3</p> <p><b>discrepancies</b> 27:1</p> <p><b>discrepancy</b> 129:23 130:3</p> <p><b>discuss</b> 30:14 33:23 39:13 61:19 62:23 62:23 64:9 65:1 75:14 85:1 86:8,23 91:22 103:5 105:15 106:3,11 136:22 144:15</p> <p><b>discussed</b> 40:6 46:17 57:9 63:7 66:23 75:20 76:17 79:19,21 80:11,11 80:15 84:16 87:16 87:24 92:1 95:13,15 98:15 104:6,8 107:16,18 111:15 125:1 130:6 131:6 131:15 142:12</p> <p><b>discusses</b> 130:22</p> <p><b>discussing</b> 30:13 61:15 84:24 92:25 128:12</p> <p><b>discussion</b> 42:7,15 43:5 57:7 62:18 63:9,10,12,16,23 64:7,12 65:3 66:14 67:21 68:19 74:7,21 74:23 75:10 76:13</p>	<p>76:16,20 77:19 79:7 79:12 85:24 86:3,6 87:12 88:6 128:1 133:4 134:24</p> <p><b>discussions</b> 43:17,19 43:21 52:12 105:6 127:7 128:19</p> <p><b>displeased</b> 57:16</p> <p><b>disprove</b> 116:25</p> <p><b>disqualifies</b> 94:7</p> <p><b>disrespectful</b> 60:2</p> <p><b>distinguish</b> 55:8</p> <p><b>district</b> 1:1,1,5,8 23:7 28:4 29:20,21 31:14 33:4,9 39:2 39:11 41:10 43:11 43:13,23 44:7 45:8 45:17 53:19 55:5 57:7,10 58:24 59:20 60:5,12,13 61:12,20 62:11 63:17 66:15 66:20 67:4,21 68:15 68:20 70:17 72:13 74:11 80:5 82:14,23 84:1,2,13,14,15,21 85:5 90:11 91:2,5,6 91:13,18 96:3 99:11 100:15 101:25 103:24 107:4 109:4 111:6 112:14,21 114:5,12 116:15 117:8,9 124:12 125:6 127:2,14 128:15 131:25 132:6,10,22 133:14 136:14 138:6,14 140:11,16,19 143:8 143:16,18 144:12 144:16,21</p> <p><b>district's</b> 39:17 43:14 44:12 64:2 109:21 111:15 127:4</p> <p><b>divided</b> 11:11</p>
--	---	--	---

<p><b>division</b> 21:4</p> <p><b>doctor</b> 27:7</p> <p><b>document</b> 10:24 11:24 13:10,17 30:8 35:12 51:19 56:19 56:20,21 57:2,6 98:19,25,25 99:2,5 99:15,22 101:24 104:10 117:7 122:3 122:10 123:21 125:10,12 128:20 128:23 129:1,1</p> <p><b>documentation</b> 91:7 94:1</p> <p><b>documenting</b> 22:20 22:21</p> <p><b>documents</b> 34:10 51:5,9,20 56:12,23 68:3,5 99:8 121:23 121:25 122:25</p> <p><b>doing</b> 51:10,18</p> <p><b>door</b> 105:3 132:14 133:7</p> <p><b>doors</b> 23:17 67:2 86:13</p> <p><b>dorsal</b> 17:19</p> <p><b>downs</b> 80:11</p> <p><b>downstairs</b> 9:12</p> <p><b>dr</b> 2:3 62:11,14 67:14 84:12,13,16 85:9 86:6,6,15,24 87:6,9,17 88:4,4 91:14,16 93:8 94:24 102:5,6,14 103:12 103:14 108:9,12,25 110:10 144:14,19</p> <p><b>drop</b> 41:14 65:6 74:13</p> <p><b>due</b> 49:24 50:13</p>	<p>47:11,16,22 48:12 49:9,14,16,19 52:8 52:18 53:9 54:16 55:25 57:13 58:2,3 58:8,20,21,25 59:2 59:18 61:2,3,14 63:5 69:3,9 80:25 81:15,21,24 102:22 103:12 108:12,20 108:25 109:7,23 111:13 112:22</p> <p><b>eager</b> 23:4 40:10</p> <p><b>earlier</b> 40:18 86:1 95:20 116:5 129:4</p> <p><b>early</b> 7:17 88:15 98:5,8 114:21</p> <p><b>earrings</b> 77:6,23</p> <p><b>ease</b> 13:3</p> <p><b>eastern</b> 1:1</p> <p><b>easton</b> 117:5</p> <p><b>ecro</b> 2:5</p> <p><b>ed</b> 74:9 78:18,20 79:4 80:12</p> <p><b>education</b> 1:14 18:5 18:11 32:11 42:9,12 44:20 45:1,4,10 65:20 66:24 67:12 83:4,6 86:12 87:16 95:13 97:23 98:3 111:25 112:3 120:5 130:13 137:1</p> <p><b>educational</b> 5:25 32:9 62:10 65:13 97:25</p> <p><b>edward</b> 1:8</p> <p><b>effect</b> 135:10</p> <p><b>efficiency</b> 49:24 50:13</p> <p><b>effort</b> 71:7</p> <p><b>efforts</b> 58:14 82:13</p> <p><b>eg10108594</b> 13:7</p> <p><b>egs</b> 1:3</p> <p><b>egypt</b> 14:2</p> <p><b>either</b> 18:8 26:8 80:4 85:5 106:19</p>	<p>113:7 139:1,9</p> <p><b>elaborates</b> 27:4</p> <p><b>elbow</b> 73:10 74:2</p> <p><b>elect</b> 121:2</p> <p><b>elected</b> 22:10 120:21</p> <p><b>electronic</b> 146:9</p> <p><b>elements</b> 117:1</p> <p><b>eligibility</b> 28:6 95:23</p> <p><b>eligible</b> 94:8,15 130:13</p> <p><b>ell</b> 45:13 82:2</p> <p><b>eluded</b> 79:6</p> <p><b>elyse</b> 3:3 4:14,22 5:2 109:16,25</p> <p><b>email</b> 125:15 126:19 129:14,19 130:2,5 133:11,17,22 134:15,18 135:3</p> <p><b>empathize</b> 139:5</p> <p><b>employee</b> 72:13,15 119:23 124:16 125:21</p> <p><b>employees</b> 119:4</p> <p><b>employment</b> 6:12,25 7:4,14,20 8:8,12 16:6,7 18:16 21:24 29:23 31:6 39:20 42:18 62:9 67:11,13 75:17 86:9,11 125:24 126:7,12</p> <p><b>encounter</b> 7:16</p> <p><b>ended</b> 94:4 96:17</p> <p><b>engage</b> 133:3</p> <p><b>english</b> 15:8,14 17:24 50:3 68:25 70:21 98:20 111:11 112:20</p> <p><b>enroll</b> 22:4 24:2 25:1,8 32:7 41:11 45:12 49:25 54:12 60:20 66:3 67:8 90:12,24 94:8 126:21 128:10</p>	<p><b>enrolled</b> 20:7,10 24:11 27:17 32:3 54:5 55:5 58:14 60:9 61:10 63:1 128:1 132:11 133:6</p> <p><b>enrolling</b> 63:21 71:24 132:21 141:6</p> <p><b>enrollment</b> 8:22 23:25 24:19 25:14 26:17,18 27:11 28:6 28:23 29:17 30:14 32:8,22 43:15 44:4 44:4,8 45:8,12 50:17 52:10 62:24 64:8 65:1,5,23 66:8 66:11 67:15 68:25 84:25 85:1 88:16 89:23 90:8 91:3,8,9 91:22 93:17 135:11 140:10</p> <p><b>enter</b> 19:6,11</p> <p><b>entered</b> 12:4 19:8,14 19:17 21:18 124:15</p> <p><b>entering</b> 130:24</p> <p><b>entitled</b> 82:2 146:10</p> <p><b>entries</b> 18:21</p> <p><b>entry</b> 19:16 21:21 22:17,19 23:23 24:19 26:1 27:9 28:16,17 29:16 30:2</p> <p><b>environment</b> 107:18 111:21 139:25</p> <p><b>equal</b> 126:14</p> <p><b>equate</b> 94:14</p> <p><b>eric</b> 1:10</p> <p><b>escaping</b> 68:2</p> <p><b>esl</b> 27:14 29:23 31:13 32:12,23 33:2 39:19 42:14 45:13 74:16,17,21,24 75:1 79:24 80:2 85:2 86:9,15,16,19,25 87:3,10 98:12 131:8 131:24</p>
<b>e</b>			
<p><b>e</b> 3:1,8 4:1,1 5:2 20:5 30:12,15,17,20 32:6 33:19 35:14,17 36:6,22 38:22 43:2</p>			

<p><b>especially</b> 60:8 79:22 106:16 142:13</p> <p><b>esq</b> 1:10,11,14,17,19 2:2</p> <p><b>essentially</b> 15:14 108:20 126:7</p> <p><b>establish</b> 64:14</p> <p><b>established</b> 56:9</p> <p><b>estimate</b> 97:14</p> <p><b>estimated</b> 68:8</p> <p><b>et</b> 1:3</p> <p><b>ethnic</b> 15:2</p> <p><b>ethnicity</b> 14:22</p> <p><b>evaluate</b> 63:20</p> <p><b>evaluated</b> 55:4 86:25</p> <p><b>evaluation</b> 144:22</p> <p><b>evening</b> 100:5</p> <p><b>event</b> 126:19 131:3</p> <p><b>events</b> 110:5</p> <p><b>eventually</b> 83:2,17 133:16</p> <p><b>everybody</b> 122:14</p> <p><b>everyone's</b> 89:4</p> <p><b>evidence</b> 12:17,22</p> <p><b>exact</b> 84:3</p> <p><b>exactly</b> 51:8 121:23</p> <p><b>examination</b> 5:9 89:3 117:25 118:5 125:1</p> <p><b>examined</b> 118:3</p> <p><b>example</b> 64:13 119:12,19</p> <p><b>exception</b> 142:16</p> <p><b>exceptions</b> 75:15</p> <p><b>exchange</b> 36:22 43:11 103:12,14 138:13</p> <p><b>exchanged</b> 31:17</p> <p><b>exchanges</b> 48:25</p> <p><b>excuse</b> 47:8 60:24 64:21</p> <p><b>exhibit</b> 12:17,19,22 12:23 18:20 30:6</p>	<p>33:19 34:2,9,25 36:22 38:14 46:18 46:23 48:2,6 49:15 51:1 52:4 54:16 55:14,22 56:8 81:3 81:6,12,19 99:12 102:17 108:4,11 113:20,25 117:13 117:17,20 121:8,9 123:21 125:11 128:24 133:10</p> <p><b>exhibits</b> 9:13 46:21 115:6 116:5,10 117:18</p> <p><b>expedited</b> 78:18 80:13</p> <p><b>experience</b> 43:24 82:3 105:13 139:24</p> <p><b>experienced</b> 44:1 82:5</p> <p><b>experiences</b> 43:22 82:9</p> <p><b>explain</b> 18:21 67:23 77:2 134:11</p> <p><b>explained</b> 67:25 93:19 134:18</p> <p><b>explaining</b> 41:21</p> <p><b>expressed</b> 23:5 107:11</p> <p><b>expressions</b> 42:2 64:20</p> <p><b>extensive</b> 144:22</p> <hr/> <p style="text-align: center;"><b>f</b></p> <hr/> <p><b>face</b> 73:12 136:20</p> <p><b>faced</b> 72:2</p> <p><b>facial</b> 42:2 64:19</p> <p><b>facility</b> 26:10 32:25 78:10</p> <p><b>facing</b> 64:16 104:7</p> <p><b>fact</b> 8:21 27:6 51:14 59:2,16 70:22 79:6 98:2 103:16 123:12 131:22 134:17 141:25</p>	<p><b>factors</b> 41:24 42:8 64:18,18</p> <p><b>fafsa</b> 94:21 95:21,21 96:10,22</p> <p><b>fair</b> 11:10 82:7</p> <p><b>fairly</b> 81:20</p> <p><b>faisa</b> 8:18 12:12,13 14:20 16:1,17 32:2 100:18 103:22 112:19 113:8 127:23</p> <p><b>faisa's</b> 20:10 22:10 120:20,23</p> <p><b>falcon</b> 72:8</p> <p><b>falcone</b> 77:14 78:22 79:7,20</p> <p><b>falling</b> 85:16</p> <p><b>familiar</b> 8:4 15:3 21:9 31:19 48:6 70:22 81:23 91:1</p> <p><b>families</b> 7:8,23 137:18</p> <p><b>family</b> 11:7 14:7,16 14:17 16:16 20:19 22:22 62:25 64:17 68:24 95:24 99:18 119:20 120:2,8,17 121:21,23 132:9 138:11 139:6</p> <p><b>family's</b> 20:4</p> <p><b>far</b> 62:10 82:2 91:25</p> <p><b>faster</b> 80:14</p> <p><b>fbi</b> 6:17,20</p> <p><b>fear</b> 105:22 106:18</p> <p><b>feared</b> 112:7</p> <p><b>february</b> 61:25 62:2 66:9 69:4,12 70:19 86:4 103:18</p> <p><b>federal</b> 117:5</p> <p><b>feel</b> 80:3 105:18,19 112:4,8,8 114:25,25 115:1,2 139:19 141:23</p> <p><b>feeling</b> 32:17</p>	<p><b>feels</b> 110:21</p> <p><b>felt</b> 64:20 80:2,19 112:9 137:13 140:9</p> <p><b>female</b> 143:6,12</p> <p><b>females</b> 141:25</p> <p><b>feminine</b> 75:19,21 76:2 142:1</p> <p><b>figure</b> 60:7 98:24</p> <p><b>file</b> 11:4,5,21 12:11 19:5,21,23 20:15 56:21 60:22 83:14 83:16</p> <p><b>filed</b> 66:11 76:17</p> <p><b>fill</b> 19:2</p> <p><b>filled</b> 18:6,9</p> <p><b>filling</b> 97:6</p> <p><b>finally</b> 60:8 66:3 92:23 97:1,12 130:9</p> <p><b>financial</b> 95:23 96:5 96:13 97:21</p> <p><b>find</b> 20:9 66:23 80:20 92:22 136:8</p> <p><b>finding</b> 17:19</p> <p><b>fine</b> 22:7 34:16,20 100:22</p> <p><b>fingerprinting</b> 6:17</p> <p><b>finish</b> 89:1,2</p> <p><b>first</b> 8:6,9 11:11 12:2,25 17:16 19:16 19:20 20:2,24 21:22 22:8,18 23:1 28:17 29:10 30:20 31:15 38:3 52:17 53:1,13 54:20 60:18 61:8 63:11 69:20,22 72:5 73:5,18 76:23 82:15 83:7 90:19,19 91:23 92:25 99:2 121:9 122:15 139:15</p> <p><b>five</b> 13:2 141:2</p> <p><b>fled</b> 14:6</p> <p><b>flippant</b> 132:14</p> <p><b>flipping</b> 16:13</p> <p><b>floor</b> 9:13 139:18</p>
---	--	---	---

<b>focus</b> 12:25 <b>focused</b> 66:21 71:21 <b>folks</b> 23:18 59:17 88:24 116:14 128:16 <b>follow</b> 96:22 97:8 131:25 134:15 144:6,15 <b>following</b> 49:19 <b>fonics</b> 50:20 54:12 <b>fonix</b> 49:25 <b>fontaine</b> 5:22,22 <b>foregoing</b> 146:8 <b>forgive</b> 53:4 <b>form</b> 13:1,14 100:3 100:25 121:10,11 123:14 <b>formal</b> 109:10 <b>formalize</b> 63:4 <b>formalized</b> 69:1 <b>former</b> 50:6 115:23 <b>forms</b> 13:15 <b>forth</b> 58:16 <b>forthcoming</b> 106:15 136:14 <b>found</b> 52:22 76:6 82:1 <b>foundation</b> 48:7,9 51:7 56:23 <b>four</b> 29:15 <b>fourth</b> 20:22 23:24 29:16 <b>frame</b> 45:12 <b>free</b> 22:13 96:3 <b>french</b> 5:20 <b>friend</b> 105:11 120:4 120:17 138:11 144:9 <b>friends</b> 138:15 <b>front</b> 10:16 30:7 99:8 <b>frustrations</b> 79:21 104:21 <b>fulfilling</b> 67:12	<b>full</b> 4:25 23:2 53:23 71:3 119:7,10 136:4 <b>fully</b> 87:5 113:12 <b>fumbling</b> 92:21 <b>funding</b> 33:8 115:17 119:9 <b>further</b> 102:4 110:20 <b>future</b> 88:1	41:16 42:10,17,25 43:4 45:25 50:19 52:3,17 67:10 68:9 73:5 74:17 76:12 86:3 87:15,19 88:9 90:17 93:19 94:15 95:8,23,25 96:3,14 96:18 97:22 101:7,8 105:6,25 108:10,24 109:13 115:15 120:21 121:3,3 131:12 139:4 142:19 <b>goal</b> 67:11 82:22 86:11 <b>goes</b> 8:12 41:22 51:17 68:11 136:19 139:23 <b>goggin</b> 2:3 <b>going</b> 15:4 17:5 19:16 22:19 23:2 26:23 27:5 28:23 29:1 39:14 42:3,13 42:14 45:25 48:1 51:6,14,16 56:6 58:9,11 61:5 66:16 66:17 67:5 69:11,12 70:15 73:13 81:11 85:14,17 86:4 88:7 88:10 92:14 93:21 94:23 96:21 101:23 103:23 104:11 106:18 111:22 113:9 114:24 116:6 116:22 119:8 126:20 129:13 138:1 144:14 <b>good</b> 4:4,6,15 5:11 5:12,24 15:17 76:24 89:1,5 118:7 136:7 <b>gotten</b> 101:5 109:3 <b>government</b> 44:21 82:25 83:19,19 121:20	<b>grab</b> 73:8,9 74:1 <b>grabbed</b> 73:18 <b>grade</b> 94:14 95:11 <b>graduate</b> 41:14 65:16,18 80:14 <b>graduates</b> 65:19 <b>graduating</b> 78:19 <b>great</b> 9:19,25 <b>greatly</b> 105:25 <b>green</b> 76:23 <b>grounds</b> 83:8 <b>group</b> 65:21 70:20 74:19,22 <b>groups</b> 83:23 <b>grudge</b> 135:8 <b>grudges</b> 135:6 <b>guards</b> 70:10 <b>guess</b> 56:22 100:17 <b>guidance</b> 32:16 <b>guidelines</b> 85:3 <b>guy</b> 56:2 57:19 59:1 59:10 <b>guys</b> 129:24	
	<b>g</b>			
	<b>g</b> 1:8 4:1 146:7 <b>gain</b> 67:12 <b>galledo</b> 83:10 <b>gathering</b> 105:25 <b>ged</b> 39:20 54:9,13 131:2,7,11,24 138:1 138:3,7,9,13 <b>gender</b> 42:1 76:9 106:16 136:21 141:22 142:5 <b>general</b> 17:16,17 62:23 74:9 78:18,20 79:4 80:12 86:11 144:16 <b>generally</b> 19:10 21:8 21:12 29:13 81:21 87:24 <b>gentleman</b> 16:21 104:2 <b>getting</b> 9:7 20:14 72:5 86:5 105:14 119:8 128:1 140:15 <b>girl</b> 75:25 <b>girls</b> 139:20 143:9 <b>give</b> 68:7 69:8 70:5 96:21 102:14 112:5 <b>given</b> 13:10 16:9 25:20,20 53:3 68:1 111:23 <b>glass</b> 4:18 <b>glitch</b> 10:13 <b>go</b> 8:9 10:17 29:15 30:19 36:5,10 37:17 37:20,24 40:7,10,13			
			<b>h</b>	
			<b>h</b> 3:8 5:2 <b>hacc</b> 95:15,17,25 96:3,14,23 97:5,23 <b>hair</b> 105:5 <b>half</b> 71:3 <b>hall</b> 73:6,6 77:4 <b>halls</b> 70:8 <b>hamilton</b> 1:11 <b>hand</b> 74:2 87:25 <b>handcuff</b> 139:18 <b>handcuffs</b> 140:2 <b>handed</b> 46:14,17 97:2 <b>handle</b> 71:25 77:9 <b>hands</b> 72:3 73:11,13 <b>happen</b> 39:14 85:18 <b>happened</b> 20:15 24:23 44:7 58:8 90:22,23 91:20 93:15 98:10,22	

<p>104:5 131:20  <b>happening</b> 96:17  <b>happens</b> 98:8  <b>happy</b> 23:9  <b>hard</b> 137:17 145:3  <b>hardship</b> 97:21  <b>harrisburg</b> 95:18  <b>hassan</b> 8:3 16:20,21  31:23 116:20 117:9  119:19 120:2,17  138:11  <b>head</b> 7:20 20:17  31:13 62:8,9,15  80:2 81:15 82:16  83:21 133:3 140:25  <b>health</b> 17:16,17  26:10  <b>healthy</b> 17:20  <b>hear</b> 85:10 134:5,6  <b>heard</b> 69:9  <b>hearing</b> 1:7 139:22  <b>hearsay</b> 56:13,16  <b>heated</b> 63:12 67:20  <b>heisey</b> 101:12  103:24  <b>heisey's</b> 103:5  <b>held</b> 12:7  <b>help</b> 19:24 23:8  135:22 136:8,11  138:1 143:13  <b>hesitation</b> 137:8  <b>hi</b> 118:8  <b>hiccups</b> 140:15  <b>high</b> 27:12 42:12,14  42:21,22 49:24  50:13 67:1 74:12  87:16 94:14 96:24  131:4,8,13,15 132:1  137:14,15,24 138:3  138:8  <b>higher</b> 126:4  <b>highest</b> 68:1,7  <b>highly</b> 116:21  <b>hill</b> 2:4</p>	<p><b>hilt</b> 30:24 31:11,12  33:20 35:19 36:7,11  37:1 38:15 39:9,10  39:17,21 40:3,5  49:16 52:4,9,19  53:9,22,23 54:17  55:8 59:13 61:4,9  62:11,13 91:14,21  92:22 93:6,7,10,17  94:6 103:25 127:24  129:16  <b>hilt's</b> 52:20  <b>hire</b> 119:10  <b>hired</b> 119:6,6  <b>history</b> 6:18 15:23  18:9 97:4 117:4  <b>hold</b> 135:6  <b>holding</b> 139:3  <b>holistic</b> 42:12 67:1  <b>home</b> 32:9 98:18,18  98:21 99:10 100:7  100:13 101:22  104:8 105:24  112:14  <b>homework</b> 75:10,13  78:8,9  <b>honor</b> 4:6,11 9:7,11  10:10 12:16 38:1  46:9,17 47:7 50:24  55:18 56:24 89:9,20  99:13 115:5 116:4  116:19 117:15,22  123:4 145:14  <b>honorable</b> 1:8  <b>hooper</b> 1:17  <b>hoping</b> 89:1  <b>hospitals</b> 68:5  <b>house</b> 100:2  <b>huh</b> 16:4 24:21 82:7  88:14 95:4 125:4  <b>hygiene</b> 75:19,22  76:2 142:1</p>	<p><b>i</b>  <b>idea</b> 139:14,17  <b>identified</b> 124:9,13  126:24 141:9  <b>identify</b> 125:16,18  <b>immediately</b> 79:10  <b>immigration</b> 6:5  121:10  <b>immunization</b> 53:2  53:18 61:12  <b>implicate</b> 88:24,24  <b>importance</b> 66:24  <b>important</b> 42:22  49:11 80:20 123:13  123:15  <b>impression</b> 69:21  72:5 125:7 127:3,4  <b>improve</b> 86:24  <b>inadvertently</b> 59:6  63:6  <b>incidents</b> 85:22  105:1,3,4  <b>include</b> 77:22  123:13  <b>included</b> 75:18  123:16  <b>including</b> 75:19  139:20  <b>incoming</b> 70:25  72:20  <b>indicated</b> 133:12  135:16 137:12  140:9  <b>indicates</b> 24:1  <b>indication</b> 24:14  111:23 112:1,2  <b>indiscernible</b> 10:19  51:1 115:11  <b>individual</b> 15:24  16:16 28:4 41:23  42:2 71:24 76:12  85:6,7,9,13,19 96:9  99:5 120:16 136:16</p>	<p><b>individuals</b> 86:12  137:17 139:21  <b>info</b> 53:18 61:11  <b>information</b> 13:23  35:18 52:11 54:17  74:14 110:13 111:4  111:7 121:19 127:9  127:9 136:15  138:16  <b>informed</b> 27:11  <b>initial</b> 12:2 40:15  66:11 91:4  <b>initially</b> 50:17 92:13  92:18  <b>injunction</b> 1:7  <b>injustice</b> 105:22  <b>inquired</b> 100:13,16  <b>inquiring</b> 128:16  <b>inside</b> 70:11  <b>instance</b> 44:9  <b>instances</b> 85:2 86:10  110:19  <b>institutions</b> 87:19  <b>instructed</b> 51:1  <b>instruction</b> 74:7  <b>intake</b> 22:6,21  <b>integral</b> 58:15  <b>intended</b> 134:13  135:3  <b>interaction</b> 73:4  132:15 134:6,10  <b>interactions</b> 106:4  <b>interest</b> 132:21  <b>interested</b> 40:6,11  40:23 66:22 131:23  132:7  <b>interesting</b> 122:13  134:2  <b>interim</b> 127:18  <b>internal</b> 43:19 86:22  <b>internally</b> 82:15  <b>international</b> 6:2  88:10  <b>interpretation</b> 68:22  70:16,24 100:14</p>
--	---	--	---

103:23 104:8,10 <b>interpreted</b> 50:8 <b>interpreter</b> 70:18 93:23 100:4 101:23 104:4 106:6,7 133:4 <b>interpreter's</b> 106:9 <b>interpreting</b> 93:24 102:2 <b>interrupted</b> 137:1 <b>interruption</b> 60:24 <b>interviewed</b> 49:23 <b>intimate</b> 142:12 <b>introduction</b> 56:7 <b>investigate</b> 44:13 <b>investigation</b> 44:13 85:12 107:24 110:12 <b>involved</b> 8:7 42:9 58:13 64:24 127:20 <b>involvement</b> 131:20 <b>involves</b> 11:11 <b>involving</b> 31:23 39:1 <b>iraq</b> 50:5 <b>issa</b> 1:3 22:16 23:21 24:17 26:2,13 28:15 35:2 36:5,10,25 38:13 45:24 47:12 48:14 53:24,25 55:13,21 56:20 58:5 61:2,7 102:24 134:12,15 <b>issa's</b> 58:23 <b>issue</b> 32:1 44:14 87:2 124:12 127:13 130:9 <b>issues</b> 7:14,17,19 65:4 84:20 91:1 97:1 104:6 130:6 144:12,16 <b>items</b> 77:24 <b>it's</b> 33:9	<b>jack</b> 39:9 40:5,16 58:3 62:11 63:13,18 103:25 127:24 <b>jail</b> 105:25 <b>jaime</b> 2:5 <b>janet</b> 82:21 <b>january</b> 39:2 47:23 52:5 58:2 60:14 61:15,23 67:24 86:2 135:14 <b>jay</b> 91:14 94:24 <b>jewelry</b> 77:19,21 <b>job</b> 6:13 42:16,20,23 51:10 66:23 86:5 132:24 137:14 <b>josh</b> 83:10 <b>judge</b> 1:8 <b>judge's</b> 61:1 <b>june</b> 115:14	111:19 <b>knew</b> 10:21 87:1 <b>know</b> 9:24 13:8,13 13:15,25 15:1 17:7 19:20 23:19 25:11 26:24 28:1 29:1,24 30:4 31:25 32:19,19 33:6,7,11 40:14 42:19 43:8 44:10 50:4,6 51:8 67:22 70:24 71:5,18 72:6 72:9,12 73:1 77:22 83:8 86:16 88:19 91:16,17,18 94:6,25 95:24 96:8,17 97:16 97:19 98:1,2 99:9 101:13 105:10 107:8,10,11 111:6 113:11,14 114:11 114:17,20 115:16 116:17,17 118:15 122:4,5,5,7,14,22,24 123:18 124:5,19,20 125:5,8,9,20 127:2 127:14,24 128:8 130:8 131:11,21 132:16,17,19 133:7 138:6 139:8,21 140:6,14,17 142:15 142:18,22,24,24,25 143:24 144:2 <b>kristina</b> 1:14 <b>kulick</b> 2:5 9:24	<b>lancaster's</b> 140:11 <b>language</b> 15:18 23:6 40:9,12,25 41:2,15 42:5,7,20 49:24 50:13 63:2 64:18 65:10 66:21 72:24 75:2 76:10 78:24 105:8 107:13 111:12 113:13 123:15 131:23 132:4,22 136:20,22 136:23 137:9 143:23 <b>languages</b> 15:6 17:22 <b>lapses</b> 32:11 <b>larger</b> 66:14 <b>lastly</b> 144:19 <b>late</b> 92:23 93:12 113:3 <b>latest</b> 33:24 <b>law</b> 1:14 44:13,20 45:7 85:3 136:8 <b>lawyer</b> 44:16 <b>lawyers</b> 83:22 115:25 117:2 <b>lay</b> 48:7,9 56:22 <b>lcfs</b> 82:16 <b>leading</b> 90:16 <b>learn</b> 43:12,15,22 44:6 45:6,15 <b>learned</b> 45:11 71:15 136:6 <b>learners</b> 45:13 <b>learning</b> 112:9 115:2 <b>leave</b> 94:3 97:7 <b>leaves</b> 94:2 <b>leaving</b> 95:11 <b>led</b> 60:10 <b>left</b> 14:11,12 20:22 97:7 100:3 132:17 <b>legal</b> 68:8 82:8 83:8 101:24 110:1
	<b>k</b>		
	<b>kasim</b> 50:23 <b>kathleen</b> 1:11 <b>keep</b> 73:3 98:12 <b>kept</b> 11:8 <b>khadidja</b> 1:3 45:24 48:14 49:2,6,12 50:17 52:9,14 53:24 53:25 55:3,9 56:20 58:5,23 60:7,15 62:19 69:6,11,14 70:12,18 71:8,11 79:15,16,16 <b>khadidja's</b> 53:2 61:19 65:1,22 <b>khadija</b> 134:12,15 134:19 135:2 141:16 142:8,15 143:12,21 <b>kids</b> 26:6 <b>kind</b> 11:11,14 22:19 52:23 57:16 60:1 64:14 73:20 77:18 82:7 97:4 103:11 104:1 109:21		
	<b>j</b>		
<b>j</b> 1:10,19			
		<b>l</b>	
		<b>lack</b> 62:24 104:8 107:17 115:16 132:21 <b>lancaster</b> 1:5 20:20 29:21 48:16 53:3,19 58:24 61:12 81:16 82:14 90:4 95:19 96:3 119:2 133:14 138:7,14 140:19 143:8	

<p><b>legally</b> 82:2 138:22  <b>legitimacy</b> 56:17  <b>lengthy</b> 81:21  <b>letter</b> 112:17,19,22  113:10,10 114:4,8  114:11 116:13  <b>letting</b> 27:20  <b>level</b> 59:24 60:1  69:23 126:4  <b>levels</b> 15:12 57:15  73:4  <b>liberty</b> 115:18  <b>life</b> 66:25 138:1  <b>likelihood</b> 65:15  <b>limited</b> 65:13 117:6  117:11 119:6  <b>line</b> 44:11 69:3,11  83:15 108:18 115:6  <b>lines</b> 76:18  <b>listed</b> 16:25 18:11  18:17 99:1  <b>listened</b> 83:12  <b>literacy</b> 32:13,23,25  33:3,12 37:14 38:5  39:19 42:11 130:18  131:2,9,24  <b>litigation</b> 116:2  <b>little</b> 5:25 6:23 14:5  47:19 72:22 95:3  135:13 141:16</p>	<p>49:14 53:1,8,9,12  55:6,13 58:25 81:19  85:13,18 91:24  113:19 128:20  130:15 136:10,13  <b>looked</b> 36:22 44:12  59:3 83:7  <b>looking</b> 6:18 34:17  53:6 91:24  <b>looks</b> 13:21 19:1  109:14  <b>lot</b> 40:8 66:21,22,24  71:19,21,21 85:15  104:6  <b>lots</b> 138:15  <b>loud</b> 24:23 37:10  <b>lrs</b> 36:12 112:20  <b>lucky</b> 69:2  <b>lunch</b> 89:4 145:23  <b>lutheran</b> 6:5 7:3 9:2  12:8 31:7 35:24,25  43:18 48:15,18 49:1  50:10 62:6 82:18  84:20 88:3,16 89:24  115:10,18,20  118:15,23 119:4,13  119:13 121:10  125:21 127:17  133:13 140:22</p>	<p>52:18 53:9 54:16  55:25 57:14 58:2,3  58:8,20,21,25 59:2  59:18 61:3 63:5  69:3,10 81:15,24  102:22 103:12  108:12,20,25 109:7  109:23 111:13  112:22  <b>mailing</b> 80:25  <b>mails</b> 20:5 38:22  43:2 47:16 48:12  61:2,14 81:21  <b>maintain</b> 59:25  115:22  <b>maintained</b> 11:20  <b>making</b> 60:5 63:24  67:14 85:11 87:9  139:7  <b>man</b> 36:13  <b>management</b> 8:11  18:23  <b>manager</b> 6:12 8:16  12:1 19:5 20:4,17  22:4,5 24:2,25  25:18 26:3,16,18  29:19,22 35:23  51:11 56:19 60:18  90:25 123:1 125:24  126:3,15,17  <b>managers</b> 31:5 36:3  <b>march</b> 84:2,5 107:6  138:18  <b>margarita</b> 99:14  100:12,20 101:3,6  <b>mariam</b> 49:4  <b>mark</b> 53:14  <b>marked</b> 34:25 35:4  55:21 81:11 108:10  113:25  <b>market</b> 1:24 2:24  <b>married</b> 5:21  <b>marshall</b> 2:2  <b>match</b> 22:4</p>	<p><b>materials</b> 75:18  <b>math</b> 17:4  <b>matter</b> 146:10  <b>mccaskey</b> 43:6 87:4  87:5,10 88:7 93:2  93:19 95:2 96:24  107:20 108:2  114:15,18 116:21  117:11 139:4,12,22  140:7,8 145:1  <b>mean</b> 7:2 13:21  14:15 19:17 21:7,8  23:12 41:23 61:10  70:4 90:10 136:1  <b>means</b> 15:1 50:1  <b>meant</b> 59:13 67:22  67:23,25  <b>medical</b> 25:18 26:10  <b>meet</b> 22:6 27:13,23  38:24 95:2 97:2  132:10  <b>meeting</b> 29:24 36:19  38:19 39:1 40:16,17  40:20 52:12 54:24  57:9,12 60:13 61:19  61:22 62:4,18,21  63:7 65:23,25 66:9  66:15 84:1,2,4,8,10  84:21 85:8,21 86:6  86:22 87:22 88:16  89:23 90:10,14,17  90:19 91:9,12,20  92:23 93:11,13,14  96:16,20 97:10  98:16 100:19,21  101:7,8,16,17 102:5  102:11,16 103:15  103:16,21 104:5  107:1,6,14,19 108:3  127:15,25 128:9,11  132:4,12 133:17,20  133:23,25 134:1  144:6,12,15,20  <b>meetings</b> 42:19  82:23 90:16 91:4</p>
<p><b>llp</b> 1:11  <b>load</b> 21:7  <b>locally</b> 95:15  <b>located</b> 13:23  <b>lock</b> 23:17  <b>log</b> 19:1  <b>logan</b> 1:12  <b>long</b> 60:15 67:13  79:24 89:7 97:10,14  145:18  <b>longer</b> 37:21 89:5  94:8 111:24  <b>look</b> 21:20 22:17  26:1 29:22 36:5  37:6,22 44:25 45:3</p>	<p><b>m</b></p> <p><b>m</b> 1:17 99:1  <b>ma'am</b> 4:16,23,24  5:4 46:2 51:9  145:17  <b>madav</b> 133:24,24  134:1,2,8,9,19,20  135:4  <b>madov</b> 62:5 63:10  <b>madov's</b> 62:7  <b>maiden</b> 5:22  <b>mail</b> 30:12,15,17,20  32:6 33:19 35:14,17  36:6,22 47:11,22  49:9,14,16,19 52:8</p>		

127:19 144:15 <b>meets</b> 28:5 <b>megan</b> 9:1 20:3 35:25 37:16 39:8 90:15,25 91:5 124:7 124:19 128:8 141:1 <b>melissa</b> 20:17 <b>members</b> 30:13 68:24 <b>mentioned</b> 63:14 83:25 87:20 98:21 104:13 <b>met</b> 28:5 29:19 96:24 97:12 118:9 <b>methodology</b> 128:17 <b>mg</b> 22:6 <b>mid</b> 1:23 2:23 8:20 <b>middle</b> 29:2 53:10 93:11 123:22,24 <b>mild</b> 17:19 <b>million</b> 136:19 <b>mind</b> 47:20 <b>mine</b> 34:14 99:25 128:25 <b>minor</b> 6:2 <b>minority</b> 15:2 <b>minors</b> 88:19,21 <b>minute</b> 8:23 30:10 70:23 78:6 80:1 89:2,8 <b>minutes</b> 9:19,23 97:15 101:4 <b>miriam</b> 25:7,9 <b>missing</b> 26:20 129:3 <b>misspoke</b> 35:4 37:25 <b>mistaken</b> 58:21 <b>mistakenly</b> 59:17 <b>molly</b> 1:17 <b>moment</b> 12:13 <b>monday</b> 33:24 <b>money</b> 94:22 95:25 96:1 97:22 <b>monitor</b> 70:8 97:9 98:11	<b>monitors</b> 77:4 <b>month</b> 28:13 <b>months</b> 60:22 61:18 <b>moon</b> 1:14 <b>morning</b> 4:4,6,15 5:11,12 76:18 99:13 <b>mother</b> 12:15 16:3 41:15 48:19 49:3 91:6 98:15,23 100:18 103:22 104:20,20 106:22 111:16 112:11 <b>mother's</b> 8:16,17 <b>mothers</b> 7:24 <b>move</b> 115:5 116:4 135:6 <b>mullen</b> 1:11 <b>multiple</b> 57:4 95:14	66:23 75:2 76:3 82:20 86:18,23 88:3 107:23 142:9 <b>needs</b> 139:19 141:18 141:24 142:17 143:9 <b>needy</b> 7:8,23 <b>neither</b> 110:22 <b>never</b> 47:20 133:2 140:7 <b>new</b> 32:18 118:18 119:2 <b>night</b> 100:6,6 <b>non</b> 13:4 33:6,7 <b>nos</b> 117:20 <b>note</b> 11:23 21:14,23 27:4 110:21 124:15 <b>noted</b> 60:21 <b>notes</b> 11:3,15,16,23 11:25 12:4 18:22 21:10 24:24 80:23 80:25 <b>notice</b> 112:13,16 117:8,10 <b>notwithstanding</b> 56:16 <b>november</b> 8:15 28:12 53:19 61:13 66:12 125:6 <b>number</b> 13:7 14:17 16:14 53:23 81:1 100:11 101:6 102:14 106:23 110:15 113:21 116:12 140:24 <b>numbers</b> 13:3 141:3 <b>nuts</b> 56:2 57:20 59:2 59:10	41:1,5 48:1 50:24 56:6 58:9 116:8,11 116:14,24 117:24 118:1,6 122:17,19 123:3,5 129:12 145:7 <b>oath</b> 4:21 122:9 <b>object</b> 38:2 48:1 56:6 58:9 <b>objection</b> 12:19,20 12:21 39:24 41:1,3 50:25 51:16 56:13 58:12 116:11,12 117:16,19 <b>obligation</b> 132:25 <b>observations</b> 82:9 <b>observed</b> 80:23 <b>obstacles</b> 64:15 <b>obtain</b> 138:13 <b>obtains</b> 138:9 <b>obvious</b> 105:9 <b>obviously</b> 70:1 <b>occasions</b> 98:14,15 104:19 107:3 <b>occur</b> 45:13 69:10 84:2 88:1,4 136:9 <b>occurred</b> 19:9 20:24 21:9,12,15 29:25 66:8 85:23 110:6 119:1 132:12 133:8 <b>occurrences</b> 105:8 <b>occurs</b> 19:5 140:2 <b>october</b> 119:9 <b>offended</b> 132:21,23 <b>offer</b> 12:16 33:2 67:1 68:6 79:4 85:3 85:4 98:13 <b>offered</b> 12:1 74:9 75:1 87:7 136:11 <b>offering</b> 19:5 103:23 <b>offerings</b> 71:19 78:16 79:24 <b>offers</b> 135:21 <b>office</b> 9:13 20:5 26:18 27:11 32:1
	<b>n</b>		
	<b>n</b> 3:1 4:1 5:3 105:4 <b>name</b> 4:25,25 5:21 5:22 8:3,17 14:19 21:17 29:3 53:23 62:7 94:25 99:2,9 <b>named</b> 27:23 <b>national</b> 1:23 2:23 137:6 <b>native</b> 15:13,17 111:12 <b>nature</b> 105:7 <b>navigating</b> 143:22 <b>near</b> 23:23 114:9 <b>nearby</b> 32:25 <b>nearing</b> 85:15 <b>necessarily</b> 24:22 41:23 70:6 139:9 <b>necessary</b> 27:19 45:11 <b>need</b> 24:10,12 73:3 81:22 85:12 86:14 88:5,24 101:25 120:10 123:24 <b>needed</b> 17:18 25:15 25:17,23 63:3,20	<b>o</b>	
		<b>o</b> 1:18 4:1 5:3 <b>o'connell</b> 5:23 <b>o'donnell</b> 2:2 10:18 10:22 12:18,20 17:5 34:10 38:1 39:24	



<p>36:17 127:19,23 129:24</p> <p><b>officer</b> 140:1</p> <p><b>officers</b> 139:18</p> <p><b>official</b> 109:21 115:19 127:21 146:8</p> <p><b>officially</b> 115:14</p> <p><b>officials</b> 39:2,11 41:10 45:17 66:15 66:20 84:2,15,21 85:5 107:9 109:4</p> <p><b>oh</b> 34:16 46:11,24</p> <p><b>okay</b> 5:17 7:10,16 8:17,19,23 9:5 10:22 11:1,10,14,17 12:11 13:5,10 14:3 14:12 15:8,25 16:3 16:9 17:15 18:19 20:1,9,12 21:17,20 22:7 23:1,11,21 24:1,10 25:2,6 26:5 26:12,15 28:22 30:23 31:4,7,9,25 32:5 34:1,21 35:11 35:14 36:5,21 37:9 37:23 39:10,13,21 42:4,15 43:17 44:2 44:16,21 45:6,25 47:12,14 48:10,14 48:20 49:5,20 50:9 53:12,17 54:15 55:13 57:12,18,25 58:7,25 59:8,21 60:4 61:7,14 62:17 63:5 67:14 68:10 69:4,21 70:14 71:13 71:15 74:20 83:3 84:5 88:15,19 90:23 92:13,18,24 93:4 94:12 95:20 97:16 99:15,17 101:2 102:25 103:18 104:5 108:10,18 109:18,24 112:22</p>	<p>113:2 116:23 118:15 119:11,19 120:12,19,24 121:5 121:7,13,15,16 122:12,23 123:2,9 123:12,16,18 124:3 124:8,11,17,21 125:23 126:1,4,8,14 126:19 127:6,11,22 128:8,15,20 129:11 129:13,19 130:2,8 130:21 131:1 133:16,20,24 135:20 137:4 138:11,24 140:9 141:8 143:5,11,17 143:20,24 144:3,9 144:19,25 145:3</p> <p><b>old</b> 17:2 23:4 25:11 33:17 41:12 49:22 92:6 120:25 121:2 124:13 130:21,23 131:16</p> <p><b>older</b> 25:10,13 67:15 92:8</p> <p><b>oldest</b> 22:2,10 120:20</p> <p><b>once</b> 4:8 8:11 10:7 11:7 51:17 60:19 89:17 97:12 104:22 112:5</p> <p><b>ones</b> 6:16 83:3</p> <p><b>open</b> 10:15 46:23 67:2 81:3 137:22</p> <p><b>opening</b> 119:8</p> <p><b>openly</b> 106:2 142:13</p> <p><b>opens</b> 86:13</p> <p><b>operations</b> 115:10</p> <p><b>opportunities</b> 137:22</p> <p><b>opposed</b> 66:16 88:7</p> <p><b>option</b> 37:14,15,21 130:18</p> <p><b>options</b> 29:23 129:22 130:22</p>	<p><b>order</b> 4:8 6:13 10:6 33:12 73:3 89:16 132:10 135:22 136:11</p> <p><b>organization</b> 6:4 82:17,18 118:18,20 128:16</p> <p><b>orientation</b> 69:7,12 69:15,17 70:20 71:6 71:13,16 72:7 74:6 74:18,19,20,21,22 75:20 79:1,10,23 80:9,16,22 82:4,9 82:12 139:11,11 140:4</p> <p><b>origin</b> 137:6</p> <p><b>original</b> 13:22</p> <p><b>originally</b> 5:18 61:23</p> <p><b>originated</b> 14:8</p> <p><b>orlando</b> 20:18 62:8</p> <p><b>orms</b> 146:7,13</p> <p><b>outline</b> 103:1</p> <p><b>outset</b> 74:5</p> <p><b>outside</b> 73:6</p> <p><b>outsider</b> 105:20</p> <p><b>oven</b> 23:17,19</p> <p><b>overcome</b> 135:23</p> <p><b>overrule</b> 51:16 58:11</p> <p><b>oversaw</b> 6:25 7:8 126:13</p> <p><b>overseas</b> 50:8 121:24</p> <p><b>overwhelmed</b> 80:2 105:19</p> <p><b>overwhelming</b> 64:17</p>	<p><b>pa's</b> 22:2</p> <p><b>page</b> 3:9 13:1,6 15:5 16:5,13,19 18:19 21:22 22:15,18 23:2 23:21 24:17 26:1,12 28:15 35:1,17,22 36:11 47:19 49:15 49:18,21 52:3,17 53:9,10,13 61:3 102:23 103:4 108:10 109:14,15 121:14 123:9 124:21 125:15 129:16</p> <p><b>pages</b> 16:14,15 30:10 129:9</p> <p><b>pale</b> 53:16</p> <p><b>panning</b> 82:21</p> <p><b>paper</b> 86:21 97:5 98:17 99:18 100:8 100:12</p> <p><b>papers</b> 66:11 92:21</p> <p><b>paperwork</b> 22:24</p> <p><b>par</b> 86:17 87:1,6,8 97:3</p> <p><b>paragraph</b> 22:17 23:2 27:8 32:6,21 37:7,8,9 49:20 53:1 53:22 54:1,20 55:6 55:7 103:5 109:6 110:4,9 123:22,25 126:20 130:16</p> <p><b>paragraphs</b> 52:24</p> <p><b>parallel</b> 28:23</p> <p><b>pardon</b> 38:5</p> <p><b>parents</b> 68:21 101:18</p> <p><b>parrot</b> 51:3</p> <p><b>part</b> 11:2,5,20 20:14 33:3,9 38:14 39:7 51:19 53:5 56:21,21 59:2 75:16 117:3 119:7 130:7 135:8 140:4</p>
		<p><b>p</b></p>	
		<p><b>p</b> 1:18 4:1</p> <p><b>p.m.</b> 1:5 145:22 146:2</p> <p><b>pa</b> 1:5,13,16,18,21 1:22,24 2:4,24 6:17</p>	

<p><b>participant</b> 133:5</p> <p><b>participate</b> 133:17</p> <p><b>particular</b> 15:24 51:8 85:1,10 106:15 136:24</p> <p><b>particularly</b> 75:8 135:22</p> <p><b>particulars</b> 83:12</p> <p><b>parties</b> 4:8 10:6 89:16</p> <p><b>partner</b> 57:17 132:24 133:6</p> <p><b>partners</b> 59:24</p> <p><b>pat</b> 76:17 80:11</p> <p><b>path</b> 36:13 95:10,13</p> <p><b>pathway</b> 52:13 54:8 54:13 130:22 131:3 131:25</p> <p><b>patrick's</b> 84:6</p> <p><b>pattern</b> 43:25 64:14</p> <p><b>patterns</b> 44:2 140:10</p> <p><b>pause</b> 9:10 46:12 55:12 81:9</p> <p><b>paying</b> 67:13</p> <p><b>peace</b> 6:3</p> <p><b>peers</b> 106:19</p> <p><b>penned</b> 73:25</p> <p><b>pennsylvania</b> 1:1,17 1:20 6:21 45:3 83:18,21 118:17,24</p> <p><b>people</b> 14:17 57:4 81:1 105:2,3,4,18 122:7 142:25</p> <p><b>pepper</b> 1:11</p> <p><b>perceive</b> 105:21</p> <p><b>perceived</b> 60:1</p> <p><b>percent</b> 33:16 62:16 74:3</p> <p><b>percentages</b> 74:12</p> <p><b>perfect</b> 50:3</p> <p><b>perform</b> 132:25</p> <p><b>performed</b> 126:11</p> <p><b>period</b> 64:16 127:18</p>	<p><b>periods</b> 78:6 79:25</p> <p><b>permit</b> 51:3</p> <p><b>persistent</b> 110:6</p> <p><b>person</b> 12:1 19:14 70:21 106:10 122:24 132:7</p> <p><b>personal</b> 60:11 63:24 70:2</p> <p><b>personally</b> 107:9 142:25</p> <p><b>personnel</b> 143:13</p> <p><b>pertaining</b> 135:2</p> <p><b>pertinent</b> 19:4</p> <p><b>pervasive</b> 110:7</p> <p><b>ph</b> 14:24 20:18 30:24 35:21 50:23 62:5,8 72:8 82:21 83:10 99:1 103:23 125:15 133:18,24 134:12 144:14</p> <p><b>phase</b> 48:22</p> <p><b>philadelphia</b> 1:13 1:16,18,22,24 2:24</p> <p><b>philosophical</b> 66:14</p> <p><b>phoenix</b> 43:4,13 44:5 50:1,20 54:5 66:4 69:12,18,19,22 71:24 72:13,14,15 79:22 80:2 82:4 87:4,7 88:8,10 92:2 92:14,17,19 93:1 99:1,10 101:14 104:3,16 106:24 110:20,22 112:3,6 114:21,24 116:20 135:21 136:4 139:4 139:11,23 143:7,22 143:25 145:1</p> <p><b>phone</b> 37:16 100:11 101:4,5 102:8,13,14</p> <p><b>physically</b> 17:20</p> <p><b>picked</b> 22:3</p> <p><b>picture</b> 98:6</p> <p><b>piece</b> 86:21 98:17 99:18 100:8,12</p>	<p><b>pierced</b> 77:23</p> <p><b>pittsburgh</b> 1:20,21</p> <p><b>place</b> 53:6 66:7 87:13 92:16,18,24 92:25 95:25</p> <p><b>placed</b> 65:21 80:3 80:19 117:2 134:18 140:23 141:2</p> <p><b>placement</b> 8:10 11:7 18:24,25 21:2 58:23 78:13 79:22 91:23 92:1 93:2,20</p> <p><b>places</b> 106:1</p> <p><b>placing</b> 92:2</p> <p><b>plaintiff</b> 1:10 16:22</p> <p><b>plaintiff's</b> 3:10 4:9 8:3 12:19,22,23 117:13,18</p> <p><b>plaintiffs</b> 4:14</p> <p><b>plaintiff's</b> 117:20</p> <p><b>plan</b> 128:10</p> <p><b>plane</b> 136:18</p> <p><b>plans</b> 27:10 86:23</p> <p><b>please</b> 4:20,24 27:9 32:6 34:2 37:8 54:23 61:6,8,9 90:9 110:17 121:7,13 123:20 125:10</p> <p><b>point</b> 43:3 44:23 50:9 69:6 91:14 93:24 94:2,24 98:6 100:11,19 112:23 115:9 119:9 124:11 124:14,15,16 131:17,18,19 132:13 135:1 138:21</p> <p><b>pointed</b> 73:21 86:17 86:20,24</p> <p><b>police</b> 6:17,21</p> <p><b>policies</b> 43:16</p> <p><b>policy</b> 110:15</p> <p><b>position</b> 6:11,24 32:19 39:17 44:8 48:18 116:9 118:12</p>	<p>125:23</p> <p><b>positive</b> 60:2 136:23</p> <p><b>possible</b> 19:13 23:5 138:23 139:5 141:4</p> <p><b>post</b> 17:18</p> <p><b>practice</b> 19:10</p> <p><b>practices</b> 43:13 45:8</p> <p><b>preferred</b> 113:14</p> <p><b>preliminary</b> 1:7</p> <p><b>preparation</b> 19:23 49:11</p> <p><b>presence</b> 133:21</p> <p><b>present</b> 4:8,9 10:7,7 79:11 89:17,17 91:23 100:19 102:5 102:15 106:7,17 118:12 123:1 133:11 137:2</p> <p><b>presentation</b> 71:20</p> <p><b>presented</b> 27:18 52:14 71:7 107:1,3 110:2,3 121:25 139:23 140:3 142:3</p> <p><b>presenting</b> 70:21</p> <p><b>pretty</b> 80:14 111:1</p> <p><b>prevent</b> 142:8</p> <p><b>previous</b> 16:7 32:21 63:14</p> <p><b>previously</b> 4:8 5:21 10:7 84:17 89:17 125:16</p> <p><b>principal</b> 12:12 101:14 103:25</p> <p><b>principle</b> 113:13</p> <p><b>printed</b> 54:10</p> <p><b>prior</b> 128:3,5 131:20</p> <p><b>prison</b> 70:10 112:6 112:7</p> <p><b>private</b> 33:6</p> <p><b>probably</b> 37:12 40:15 138:22 143:10</p> <p><b>probative</b> 116:18</p> <p><b>problem</b> 9:16 10:12 90:7,8 93:6 141:9</p>
--	---	--	---

<p><b>problematic</b> 76:6</p> <p><b>problems</b> 45:19,23 62:23 105:15 145:1 145:4</p> <p><b>proceed</b> 5:5 38:11 41:7 89:19</p> <p><b>proceeded</b> 93:22</p> <p><b>proceeding</b> 109:13</p> <p><b>proceedings</b> 146:2,9</p> <p><b>process</b> 63:4 83:12 84:25</p> <p><b>productive</b> 115:4</p> <p><b>products</b> 75:20,22 76:2 142:1</p> <p><b>professionals</b> 143:7</p> <p><b>proficiency</b> 17:25 65:11</p> <p><b>profit</b> 33:6,7</p> <p><b>program</b> 6:12 7:4,7 7:23 8:13 22:4 29:23 31:6 86:17,19 86:25 87:3,4,10 97:25 98:11 125:25</p> <p><b>programming</b> 144:1</p> <p><b>programs</b> 6:25 7:1,5 83:21 119:8,9,12,16 126:13</p> <p><b>promise</b> 97:8</p> <p><b>promote</b> 82:13</p> <p><b>pronunciation</b> 5:20</p> <p><b>prove</b> 116:25</p> <p><b>provide</b> 70:16 91:7 131:10 143:16</p> <p><b>provided</b> 19:3 53:18 54:17 61:11,11 110:12</p> <p><b>providing</b> 35:18</p> <p><b>public</b> 45:10 65:20 96:2 105:25 110:15 130:13</p> <p><b>pulled</b> 46:10 105:4</p> <p><b>purcell</b> 30:24 31:4 33:20 36:7,11 37:1 38:15 39:8 125:15 125:18,19,20</p>	<p>129:16</p> <p><b>purchase</b> 118:23</p> <p><b>purpose</b> 78:19 117:6 117:12 127:25 128:9</p> <p><b>purposes</b> 56:9 142:16</p> <p><b>pursue</b> 39:20 95:12 97:22</p> <p><b>push</b> 93:2 101:19</p> <p><b>pushed</b> 132:1</p> <p><b>put</b> 73:11,12 74:2 139:18</p> <hr/> <p style="text-align: center;"><b>q</b></p> <p><b>qasin</b> 8:3 16:20 19:24 20:13 23:4 24:3,14,25 25:13,15 25:19,22 26:3 27:6 27:17 29:20,21,22 31:23 32:22 33:17 37:17,24 39:2,14,19 39:22 40:20 41:11 42:16,25 43:8,12,24 60:8 85:22 98:6,9 98:14 103:2,22 104:6 105:1 106:22 107:8 108:2,21 110:12,25 111:4,7 111:16 112:19 113:11 114:6,14,18 114:20 116:20 120:24 122:1 124:8 125:7 127:3,23 128:1,10,18 131:15 132:3,18 133:2 137:19 138:12,17 138:24</p> <p><b>qasin's</b> 8:8,15,17 12:15 20:1 25:3 26:17 28:20 29:17 30:14 40:4 44:9 45:20 55:8 64:9 100:2,18 109:7 110:19,21 112:11</p>	<p>112:14 121:16 122:5 124:12 130:3 130:11 132:21 137:9 144:6,11</p> <p><b>quasin</b> 16:21</p> <p><b>quasin's</b> 17:17</p> <p><b>question</b> 49:25 52:24 53:8,10,12,14 58:17 61:1,8 67:7 90:9 102:22 120:12 130:14 142:7</p> <p><b>questioning</b> 20:6 115:7</p> <p><b>questions</b> 52:7,20 61:4 71:20 74:10 93:21,22,24 118:12 143:1 145:8,13</p> <p><b>quickly</b> 23:8</p> <p><b>quite</b> 29:4 89:4 100:8</p> <p><b>quote</b> 73:12</p> <hr/> <p style="text-align: center;"><b>r</b></p> <p><b>r</b> 4:1</p> <p><b>r&amp;p</b> 8:10,24 11:3,5 18:22,24 20:4,17,17 21:1,9 35:23 48:21 62:9 123:1</p> <p><b>rahl</b> 144:14,19</p> <p><b>raise</b> 84:20,22 85:20</p> <p><b>raised</b> 63:25 84:23 85:6 107:5,8</p> <p><b>raising</b> 45:23</p> <p><b>rates</b> 65:6</p> <p><b>ratings</b> 74:11</p> <p><b>rau</b> 84:13,16 85:9 86:6,15 87:6,9 88:4</p> <p><b>ray</b> 17:18</p> <p><b>reach</b> 82:25 83:18 83:20,22,24</p> <p><b>reached</b> 83:9</p> <p><b>reaction</b> 57:13 80:16 111:18</p> <p><b>read</b> 22:18 23:3,3,9 24:22 26:21 27:3,8</p>	<p>29:17 32:5 36:14 37:7,9,10,19 38:6 49:20 51:4,15 52:1 54:22 110:9 113:7 123:24 130:16</p> <p><b>reading</b> 13:20 15:12 15:16 18:1 38:2 51:16,21 52:8 113:8 113:18</p> <p><b>reads</b> 38:3 110:5 113:11</p> <p><b>ready</b> 9:23 117:24 118:2</p> <p><b>real</b> 88:11</p> <p><b>really</b> 9:14 70:6,22 97:3 113:9</p> <p><b>rearrange</b> 71:10</p> <p><b>reason</b> 88:11</p> <p><b>reasonable</b> 64:21 110:23</p> <p><b>reasoning</b> 60:10</p> <p><b>reasons</b> 7:21 59:23 63:14 105:18 142:3</p> <p><b>recall</b> 39:16 40:3 43:1,7 44:18 64:2 64:11 67:14 75:7 78:24 80:9 85:24 92:10 109:18 118:10 123:25</p> <p><b>received</b> 12:23 24:7 54:5,14 100:5 117:13,21</p> <p><b>receives</b> 143:25</p> <p><b>receiving</b> 102:13 109:18</p> <p><b>reception</b> 8:10 11:7 18:25 21:2</p> <p><b>recess</b> 9:17,23 89:2 89:8 145:22</p> <p><b>recessed</b> 10:2 89:11</p> <p><b>recognize</b> 10:24 30:7 35:11 46:24 47:16 55:21 56:16 81:12 99:15 102:19 108:5 113:25</p>
--	--	--	---

<b>recollect</b> 135:8 <b>recollection</b> 67:17 <b>reconvened</b> 10:2 89:11 <b>record</b> 5:1 12:7 46:13 53:19 56:22 61:12 <b>recording</b> 146:9 <b>records</b> 18:8,11 26:17 27:10 53:2 56:15 68:3 98:12 124:23 <b>recross</b> 3:2 <b>redirect</b> 3:2 89:3 129:13 145:12 <b>reference</b> 13:3 21:13 <b>referenced</b> 105:1,3 <b>referencing</b> 141:25 <b>referral</b> 21:24 54:21 54:25 55:2 <b>referrals</b> 54:6,14 <b>referred</b> 32:12,23 54:8 <b>referring</b> 13:3 21:24 40:14,15 50:23 54:13 59:9 67:6 <b>reflect</b> 46:13 <b>reflected</b> 45:20 60:5 <b>refugee</b> 6:6,7 7:5,12 8:9 9:2 12:8 14:7 16:11 31:7 33:1 35:24 41:22 48:15 48:16 49:1 50:6 62:6 68:2,6 82:19 83:21 84:20 88:3,17 89:24 115:10,20 118:16,23 119:4,13 119:14 121:11 125:21 127:17 133:13 135:22 140:22 <b>refugees</b> 26:8 28:5 43:25 66:25 67:7,15 67:18 68:4 76:5	80:3 86:8 87:25 88:1 90:3 105:14,24 135:17 <b>refusal</b> 134:23 <b>refused</b> 85:18 132:18 133:3 <b>refusing</b> 41:11 <b>regarding</b> 43:20 107:22 <b>regardless</b> 65:18 137:6,25 <b>region</b> 1:23 2:23 <b>regular</b> 12:8 <b>reinforcement</b> 73:14 <b>reinvent</b> 86:18 <b>related</b> 7:17 <b>relation</b> 52:9 <b>relations</b> 6:2 <b>relationship</b> 120:1 <b>relationships</b> 59:25 60:3 <b>relative</b> 137:5 <b>relevant</b> 51:6 116:21 <b>relied</b> 51:9,19 68:23 <b>relief</b> 6:5 <b>religion</b> 137:6 142:24 <b>religions</b> 142:13 <b>religious</b> 42:1 76:10 136:21 141:22 142:5,7,16,22 <b>relocate</b> 118:19 <b>relocated</b> 118:16 <b>reluctance</b> 92:20 <b>reluctant</b> 106:1,20 <b>reluctantly</b> 73:22 <b>remain</b> 4:20 <b>remainder</b> 116:12 <b>remember</b> 25:12 29:2 40:5 43:10 61:22 62:1 71:1 72:10 74:1,3 77:14 84:3 90:21,22 92:6	99:2 100:6 102:9 113:1 136:3 <b>remembering</b> 75:8 <b>remind</b> 124:3 <b>repeat</b> 53:5 <b>replied</b> 131:7 <b>reply</b> 31:1 <b>reporting</b> 1:23 2:23 <b>represent</b> 40:7 120:8 <b>representatives</b> 132:7,9,10 <b>representing</b> 102:2 <b>represents</b> 117:9 <b>request</b> 76:4 100:20 109:11,22 110:19 110:25 116:20 117:1 <b>requested</b> 25:18 98:24 100:19 107:19 <b>requesting</b> 99:3 100:16 102:15 114:14 <b>requests</b> 102:4 114:11 <b>require</b> 76:18 <b>required</b> 91:7 <b>requirement</b> 33:12 <b>rescheduled</b> 61:24 <b>research</b> 44:11 82:8 <b>researcher</b> 136:7 <b>resettled</b> 90:4 <b>resettlement</b> 18:24 22:22 33:1 37:11,13 38:4 58:17 112:20 119:2,3 130:17 <b>resolution</b> 63:15 108:1 <b>resolve</b> 80:5 <b>resolved</b> 130:9 145:4 <b>resort</b> 79:4 <b>resorts</b> 73:1	<b>resource</b> 139:17 140:1 <b>resources</b> 23:8 <b>respect</b> 51:10 116:9 117:17 <b>respectful</b> 115:3 <b>respond</b> 41:18 85:6 94:12 100:20 <b>responded</b> 41:21 87:17 94:21 100:14 <b>responding</b> 33:20 42:4 61:4 <b>response</b> 36:25 38:15 41:20 52:4,18 54:2,16 62:25 64:3 69:11 93:4 94:18 107:21 108:21 109:3,11,22 111:14 111:16 <b>responses</b> 65:5 69:3 <b>responsibilities</b> 6:24 60:19 <b>responsibility</b> 143:19 <b>rest</b> 49:19 <b>restrained</b> 77:13 <b>result</b> 43:21 72:1 103:11 107:14 110:12 <b>results</b> 68:25 <b>retaliation</b> 105:23 <b>returned</b> 114:20 <b>review</b> 19:23 20:15 49:8 56:10 122:25 <b>reviewed</b> 19:21 22:24 <b>right</b> 5:24 7:14 10:16 12:25 25:24 28:18,24 31:23 32:18 33:21 34:1 35:2,19 38:16,20,24 39:11 40:18,24 47:22 49:17 51:22 51:24 52:5,15 53:6 54:18 60:23 61:17
---	--	---	---

<p>65:19 75:9 79:7  94:4 96:6 97:24  98:5 102:15 103:2  109:8 128:18  130:11 137:12  140:6  <b>rights</b> 45:13 82:3  <b>rise</b> 4:2 10:1,3 89:10  89:13 146:1  <b>risk</b> 41:14  <b>role</b> 62:16 72:11  106:9 127:21  132:25  <b>room</b> 73:6,6 106:17  <b>ross</b> 84:12  <b>rothschild</b> 1:10 4:10  46:6,11 47:6  <b>row</b> 21:21 26:13  27:3  <b>rows</b> 29:15  <b>rss</b> 7:5,10  <b>rude</b> 132:14  <b>run</b> 67:13 69:2</p>	<p>109:15 123:9  129:20 130:17  <b>schedule</b> 71:10 78:4  <b>scheduled</b> 61:23  69:6 127:25  <b>scheduling</b> 78:4  <b>school</b> 1:5 7:16,19  7:24,25 15:20,23  18:12 20:7,9 22:3  22:11 23:5,7,7,25  24:19 25:1,8 26:17  26:18,19 27:11,12  27:17,21 28:4,18  29:1,2,7,10,14,17,20  29:20,21 32:3 33:3  33:9 37:15,18,21,24  38:6 39:2,11,17,22  40:4,7,10,13 41:16  41:24 42:3,12,14,17  42:21,22,25 43:14  43:23 44:7 45:7,17  49:24 50:13 53:19  55:5 57:7,10 58:14  58:16,23 59:20  60:12,13,16,20  61:12,20 62:10  63:17 66:15,16,22  67:1,10,21 68:15  70:17 72:4,12,25  73:3 74:11,12 75:13  75:15,17 76:14  77:16 78:8,10,12,23  78:25 80:5 82:14,23  84:1,13,14 85:16  86:3,5 87:15,16  88:10 90:10,13 91:2  91:5,6 92:11 94:14  95:23 96:2,2,19,24  97:20 98:18 99:3,11  100:2,10,15,17,18  101:25 103:24  104:9 107:4,9,11,13  110:15 111:6,15  112:14,21 114:4  117:8,9 120:21</p>	<p>121:3,3 128:18  130:19,24 131:4,8  131:13,16 132:1,8  132:10,22 133:6,14  136:12,14 137:14  137:15,20,24 138:3  138:6,8,14,18,25  139:6,17 140:5,11  140:16,19 142:10  143:8,15,18 144:21  <b>schooling</b> 94:1  <b>schools</b> 53:3  <b>scoliosis</b> 17:19  <b>sdl</b> 54:6,14 61:11  <b>sdol</b> 32:7,14 37:18  37:21  <b>seated</b> 4:5,24 10:5  89:15  <b>seating</b> 71:3  <b>second</b> 9:13 13:1  21:1,20,21 22:17  26:13 27:8 31:21  46:25 47:3,5,7,19  49:15 52:3 55:7  102:23 103:4  125:14  <b>secondary</b> 60:6  <b>section</b> 11:11,14,23  <b>security</b> 104:2  <b>see</b> 37:1 47:20 49:8  53:7,7,10,14,16  57:2 61:4 83:7 97:9  110:7 114:8 121:10  121:17 123:22  124:23 125:12  126:21,25 129:17  129:25 130:5,19  134:5 136:10 143:1  143:2  <b>seek</b> 39:20 117:14  <b>seen</b> 48:12 105:23  125:11 129:14  <b>segue</b> 130:14  <b>send</b> 59:13 111:11</p>	<p><b>sending</b> 44:5  <b>sensitive</b> 143:8  <b>sent</b> 20:5 30:23 31:1  49:9 53:3 57:3,4  59:6,18 111:6,13  112:13 114:9  133:18,22  <b>sentence</b> 21:22 22:8  22:18 23:1 31:15,21  32:15 38:3 110:5  <b>separate</b> 79:7  <b>september</b> 17:1  20:20 121:17 122:2  122:16  <b>series</b> 17:15 81:21  <b>serious</b> 85:11 140:2  <b>seriously</b> 111:2  <b>serve</b> 7:22 26:7  <b>served</b> 7:7  <b>service</b> 19:3 21:9  48:15 98:12 119:1  121:11  <b>services</b> 6:5,6,7 7:3  7:6,12 8:13 9:3 12:2  12:9 19:6 22:24  31:7 35:24 36:1  43:18 48:18 49:1  50:10 62:6,15 72:11  81:16 82:19 84:11  84:12,19,20 88:2,3  88:17 89:24 98:13  104:3 115:10,20  118:16,21,23 119:3  119:4,11,13,14,18  119:20,21,24  125:22 126:7,12  127:17 133:13  140:23 141:6,12  143:25  <b>session</b> 1:4 96:22  <b>set</b> 22:4 109:24  133:2  <b>setting</b> 38:23 131:4  <b>seven</b> 14:15</p>
<p><b>s</b></p>			
<p><b>s</b> 3:8 4:1 5:2,2  <b>safe</b> 112:4 114:25  <b>sake</b> 51:15  <b>sat</b> 104:1  <b>satellite</b> 95:19  <b>saw</b> 56:20 57:13  <b>saying</b> 35:18 36:12  40:3,22 41:10 64:23  66:20 71:17 106:10  108:20 110:25  <b>says</b> 12:12 13:20  14:6,14,24 15:4,14  15:16 16:24 17:16  20:23 23:2,14 24:6  24:19 26:16 28:7,17  29:6,17,18 31:15  32:22 33:23 37:7,19  37:23 38:7,18 47:19  50:12,22 53:17 59:1  61:10 85:3 102:24</p>			

<b>seventeen</b> 124:10 <b>severe</b> 110:6 <b>sex</b> 142:14 <b>sexuality</b> 142:12 <b>share</b> 106:2,21 111:4 112:11 127:8 <b>sharma</b> 62:8 <b>sharon</b> 2:2 <b>she'll</b> 33:23 <b>sheila</b> 81:15 82:22 84:11 141:14,15 146:7,13 <b>shirt</b> 76:23,25 77:21 78:1 <b>shirts</b> 77:4 <b>shock</b> 57:15 <b>shocked</b> 80:17 <b>shoes</b> 76:19 <b>short</b> 64:16 <b>shortly</b> 43:3,9 65:24 80:22 101:3 <b>show</b> 81:11 82:1 <b>showed</b> 72:23 96:23 <b>siblings</b> 91:5 <b>sic</b> 49:25 54:12 <b>side</b> 103:24 <b>sidelines</b> 104:1 <b>sides</b> 71:2 <b>sign</b> 19:7 86:17,20 100:18 101:24 104:10 <b>signed</b> 116:15 <b>signify</b> 15:11 <b>signing</b> 102:1 <b>similar</b> 43:25 45:23 82:5 86:10 126:8 <b>simply</b> 35:18 51:3 51:15 53:24 117:1,8 120:13 134:17 <b>sincere</b> 10:11 <b>single</b> 7:24 76:17 <b>sir</b> 5:7 9:8 10:12 145:16 <b>sis</b> 119:2	<b>sister</b> 25:10 95:6 96:18 <b>sit</b> 120:14 132:18 <b>site</b> 62:5 63:10 82:21 118:17,24 119:7 <b>sitting</b> 89:4 117:5 132:8 <b>situation</b> 8:8 20:2 31:22 54:4,11 55:8 55:11 61:20 64:9 83:13 95:1 97:3,4 106:15,19 140:2 <b>situations</b> 82:6 <b>size</b> 14:14,16 <b>skill</b> 16:6 <b>skills</b> 16:8 <b>skimmed</b> 20:16 <b>skipped</b> 16:14 <b>slammed</b> 132:14 <b>slamming</b> 133:7 <b>slightly</b> 106:12 <b>slowed</b> 71:6 <b>smith</b> 1:8 <b>smooth</b> 119:15 <b>social</b> 7:6,12 <b>socialization</b> 87:18 <b>socialized</b> 87:13 <b>solution</b> 80:20 <b>somali</b> 15:16 17:14 18:3 112:23 113:7 113:11,15,16,17 123:10 <b>somalia</b> 14:6,12,23 <b>somebody</b> 27:23 44:7 100:2 101:2,5 <b>somewhat</b> 67:20 <b>son</b> 22:2 29:20 <b>soon</b> 23:5 <b>sorry</b> 7:2 9:7,11,15 10:18 22:9 34:3 35:5,8 37:20 46:9 46:16,24 47:2 66:5 74:6,22 79:15 81:6 86:4 92:3 99:7 103:13,18 108:15	112:18 113:21 125:17 <b>sort</b> 27:4 72:11 93:25 94:3 108:1 137:7 141:17 <b>sorts</b> 136:8 <b>sound</b> 146:9 <b>sounds</b> 7:13 83:13 <b>source</b> 13:22 57:7 68:17 133:12 <b>south</b> 118:23 <b>speak</b> 93:6 105:20 106:2 132:3 134:4 <b>speaker</b> 100:15 <b>speakers</b> 70:21 <b>speaking</b> 15:13,17 18:2 55:3,10 129:19 136:16 137:8 <b>speaks</b> 18:3 70:15 123:10,13 <b>special</b> 50:7 <b>specialist</b> 70:3 71:22 73:5,8 <b>specialists</b> 69:24 <b>specific</b> 76:3 <b>specifically</b> 57:9 64:9 75:21 77:15 133:10 <b>speculation</b> 39:25 58:10 59:12,14 <b>speed</b> 20:14 <b>spelling</b> 4:25 <b>spoke</b> 20:16 63:11 65:17 83:10 93:6 100:12 101:3 107:13,22 123:6 136:15 <b>spoken</b> 106:23 113:17 <b>sports</b> 75:17 <b>spring</b> 115:9 <b>square</b> 1:12 <b>st</b> 84:5 <b>staff</b> 30:13 115:15 119:7,10	<b>staffed</b> 136:4 <b>stale</b> 69:23 <b>stall</b> 105:2 <b>stamped</b> 34:11 121:14 123:21 125:12 128:21,23 129:2 <b>stance</b> 88:2 <b>stand</b> 9:22 10:8 71:25 89:18 145:18 145:22 <b>standing</b> 4:20 <b>start</b> 6:9 23:5 27:13 32:11 62:17,21 145:23 <b>started</b> 43:8 82:15 97:6 <b>starts</b> 28:17 37:8 <b>state</b> 4:25 6:17,21 13:9,9,11,17 16:10 20:6 68:12 83:19 85:4 121:22 <b>stated</b> 37:13,17 38:4 39:21 41:12 64:14 65:18 83:13 85:9,14 86:10,15 87:6 101:22 103:14 107:23 113:8 130:18 131:22 135:1,2 139:25 <b>statement</b> 110:21 <b>states</b> 1:1,8 16:10 44:25 68:12 122:15 143:3 <b>stating</b> 86:25 <b>statistics</b> 74:13 <b>status</b> 50:7 97:19 <b>stay</b> 136:12 <b>staying</b> 108:24 <b>step</b> 73:24 145:18 <b>stick</b> 74:20 <b>stipulated</b> 56:14 <b>stipulation</b> 56:12 <b>stock</b> 25:17
--	---	--	--

<p><b>stop</b> 25:2  <b>stopped</b> 115:19  <b>story</b> 106:12 117:4  <b>strand</b> 59:2  <b>streams</b> 33:8  <b>street</b> 1:15,21,24              2:24 25:16 26:8  <b>streets</b> 1:12  <b>strike</b> 85:25 132:2  <b>strong</b> 51:7  <b>student</b> 45:12 62:15              62:25 64:22 71:23              72:2,4,11 73:19,20              73:25 92:25 98:23              104:3 131:3 136:25              137:5,7,13 138:8              139:19 140:2  <b>student's</b> 73:18  <b>students</b> 18:12              24:10 44:5 45:9              63:21 64:15 66:16              68:21,24 70:9,25              72:5,20 75:1,25              77:3,13,17 80:18,21              82:2 85:7,16 87:13              87:15 88:7,9 90:12              91:25 92:3,8 93:21              96:9 97:1,20 101:17              106:20 135:11,21              135:22 139:14              140:22 141:6  <b>studies</b> 6:3  <b>stuff</b> 70:9 74:13              77:6,10 94:23              136:13  <b>subject</b> 58:5  <b>submit</b> 68:15  <b>subsequent</b> 133:17  <b>subsequently</b> 50:9  <b>substantiate</b> 110:13  <b>substitute</b> 138:7  <b>suffer</b> 105:24  <b>suggest</b> 40:13 133:4  <b>suggested</b> 42:10,11              42:18,19 54:8,22</p>	<p>95:1,5,8  <b>suggesting</b> 67:4,9              131:24  <b>suggests</b> 38:19              131:2  <b>suite</b> 1:15,24 2:4,24  <b>suited</b> 86:9  <b>summary</b> 21:11  <b>superintendent</b>              84:13,16  <b>supermarket</b> 142:10  <b>supervisor</b> 126:4  <b>supervisors</b> 82:22              83:20  <b>supplies</b> 75:18  <b>support</b> 91:3 107:17              131:7,10,11,13              137:18  <b>supported</b> 59:15              112:8 115:1 139:8  <b>supposed</b> 19:2 100:9  <b>sure</b> 6:18 9:20 10:20              53:5 55:17 70:7,8              90:25 92:7 116:24              129:9 138:15,15              141:21  <b>sustained</b> 40:1  <b>sworn</b> 4:22  <b>system</b> 11:9 91:24              92:22 131:13              140:11  <b>systems</b> 131:11</p>	<p>85:14 89:2,8 118:22              119:3 131:3  <b>taken</b> 26:5 27:10  <b>takes</b> 89:7  <b>talk</b> 20:23 32:20              65:8,10 74:15,24              78:3,13,15  <b>talked</b> 37:16 62:13              64:7 71:18,21 72:24              74:6 75:21 76:23              77:3 78:18 80:12,14              83:11 86:15 93:18              104:20 135:13,17              141:15,16  <b>talking</b> 16:1 37:8,11              37:12 38:3 50:12              56:18 57:20,21              129:20 130:17              135:9,11 137:5  <b>talks</b> 15:6 31:21  <b>tanf</b> 7:7,22 32:2              48:22,24 98:11              127:15,23  <b>tap</b> 7:5,6  <b>targeted</b> 7:6  <b>team</b> 75:17  <b>telephone</b> 39:5  <b>tell</b> 5:24 6:23 8:6              12:11 18:6 19:1              20:1 24:23 26:2              27:4 53:8,17 54:1              66:19 71:15 79:14              79:19 87:23 90:23              96:16 98:8 101:15              102:6 112:16              121:23 122:4 123:1              128:9 138:12,16              140:24  <b>telling</b> 28:10 101:6  <b>temporary</b> 7:7,23  <b>ten</b> 9:18,23  <b>tender</b> 7:17  <b>tends</b> 116:25  <b>term</b> 95:21</p>	<p><b>terminology</b> 52:11              77:15  <b>terms</b> 93:16 137:4              142:17 143:21  <b>testified</b> 12:13 38:3              40:18 86:1 121:9,16              122:1,9,15,17              123:12,23 129:15              141:1  <b>testify</b> 50:25 56:25              120:14  <b>testimony</b> 48:2 56:7              120:20 123:4 136:6              141:19  <b>testing</b> 50:2 68:25  <b>tests</b> 78:13  <b>text</b> 125:14  <b>texting</b> 31:16  <b>texts</b> 31:16  <b>thank</b> 4:4,11,23 5:4              5:8 9:25 10:5,10,23              38:10 41:7 46:19              47:8 48:10 55:19              60:23 89:9,15,20              117:15,22,23              143:20 145:6,9,14              145:15,17,20,24,25  <b>thanks</b> 31:15 32:20              129:20  <b>thing</b> 17:6 86:11              126:3 135:2  <b>things</b> 45:11,14,16              52:8 65:6 75:2 79:5              80:15 86:22 94:21              98:10 104:11 106:1              136:8,19 142:11,17              142:23 143:14  <b>think</b> 33:16 35:3              46:1 47:6 56:17              61:24 89:8 104:3              116:5,24 117:3              120:19 125:16              134:23 143:4,6,21  <b>third</b> 37:6,8 49:21              52:15 109:6</p>
	<p><b>t</b></p>		
	<p><b>t</b> 3:8  <b>tab</b> 10:17 128:22,23  <b>tabbed</b> 125:10 129:2  <b>table</b> 132:9,18 133:2  <b>tabs</b> 10:16  <b>tack</b> 1:17  <b>tactics</b> 71:22 72:1              77:8  <b>take</b> 8:7 9:17 30:10              33:12 40:8 42:13              43:12 66:7 76:19</p>		

<p><b>thirds</b> 15:5  <b>thought</b> 87:20 93:19  126:11  <b>thread</b> 134:16,18  <b>three</b> 24:2 52:7,8,24  73:4 129:9 140:14  140:23  <b>till</b> 54:13  <b>tim</b> 33:20 36:7  125:19 127:15,18  127:22 129:19  <b>time</b> 8:25 17:2 19:1  19:3 32:18,20 33:17  38:23 40:8 41:14  43:5 44:23 45:12,22  49:9 56:3,3 57:3,5  64:16 65:18 69:20  85:15 89:1,4 93:25  94:24 97:13 100:23  103:9 108:2 119:7,7  119:10 127:7 128:2  131:19 132:13  145:18,23  <b>times</b> 28:5 104:13  106:3,11,14,23  <b>timothy</b> 31:4 39:8  125:15,20 129:16  <b>title</b> 21:12 70:5  72:10  <b>today</b> 4:9 81:5 103:8  118:9 120:14 135:9  <b>told</b> 23:14 26:18  32:12 70:7,19 79:25  96:21 100:4 108:21  120:19 139:6,15  141:11  <b>tongue</b> 15:13  <b>top</b> 13:6 16:24 30:15  30:17 31:1 33:19  35:17,21 49:21  54:15 109:14  129:15 140:24  <b>topics</b> 61:21 62:22  87:24</p>	<p><b>torn</b> 68:2 136:17  <b>total</b> 141:1  <b>trail</b> 35:14  <b>transaction</b> 119:1  <b>transcript</b> 146:8  <b>transcriptionist</b>  146:13  <b>transfer</b> 107:25  109:11,22 110:20  110:25 111:3  114:13 119:5  138:13  <b>transferred</b> 107:20  108:2 114:14  116:20 119:17  <b>transition</b> 32:18  119:15 143:12  <b>translate</b> 106:10  <b>translations</b> 106:8  <b>translator</b> 22:5  106:5  <b>transpired</b> 107:10  <b>transportation</b> 23:6  <b>treatment</b> 17:18  139:19  <b>tried</b> 32:7 80:4 85:1  87:25 95:1 126:21  <b>truant</b> 138:22  <b>true</b> 117:7 136:25  141:24 144:5  <b>try</b> 44:13 80:20  82:13,22,24 105:6  <b>trying</b> 52:19 58:22  60:7,9,15,21 63:4  67:7 82:1,4 83:25  90:12 98:24 111:20  136:13  <b>turn</b> 13:1 18:19  22:15 23:21 24:17  26:12 28:15 34:1,3  38:13 47:18 54:15  99:12 102:17,23  108:4 120:24 121:7  121:13 124:21  125:9</p>	<p><b>turned</b> 133:3  <b>two</b> 1:12 11:11 15:5  19:14 22:10 28:24  30:10 39:11 46:5,7  46:8 71:2 84:15  91:5 93:21 97:19  116:16 119:7  120:20 121:8 134:6  138:5  <b>type</b> 15:20 77:10  134:9  <b>types</b> 104:24</p> <hr/> <p style="text-align: center;"><b>u</b></p> <hr/> <p><b>u.s.</b> 94:14 138:2  <b>uh</b> 16:4 24:21 82:7  88:14 95:4 125:4  <b>ultimately</b> 51:6  59:15 72:1 73:11  94:20 97:16  <b>umbrella</b> 82:17,18  <b>uncertainty</b> 94:19  <b>uncomfortable</b>  76:11 142:3 143:2,3  <b>undergo</b> 6:14  <b>undergone</b> 144:21  <b>understand</b> 20:14  59:15 71:8,11 100:8  113:9 120:6 138:17  138:21,24 139:10  <b>understanding</b>  26:23 27:16 41:9  50:16 51:17 55:1  56:11 57:24 58:7,19  59:8,16 77:1 90:19  98:22 100:1 102:1  104:11 105:7 110:1  110:24 114:23  <b>understood</b> 51:23  58:21 71:13 79:16  105:7 123:4  <b>undertake</b> 82:13  <b>unidentified</b> 34:17  <b>uniform</b> 77:18</p>	<p><b>uniforms</b> 69:24  76:22 80:12  <b>united</b> 1:1,8 16:10  44:25 68:12 122:15  143:3  <b>unsafe</b> 110:21  <b>unsure</b> 23:15  <b>unusual</b> 18:10 23:18  <b>upgrade</b> 76:25  <b>upgraded</b> 77:4,21  77:25 78:1  <b>upset</b> 59:22,22  134:10  <b>upstairs</b> 23:17  <b>use</b> 13:4 23:16 34:13  71:22 136:21  <b>useful</b> 19:4  <b>usual</b> 32:7 126:21  <b>utilizing</b> 56:20</p> <hr/> <p style="text-align: center;"><b>v</b></p> <hr/> <p><b>vaccination</b> 26:17  27:10 124:23  <b>vaccinations</b> 24:7  24:11,12,15 25:16  25:17,19,23 26:4,6  26:20 27:2,7 60:19  <b>valentina</b> 84:12  <b>various</b> 7:1,5 26:7  42:2  <b>verbatim</b> 106:10  <b>verifiable</b> 110:13,18  <b>veritext</b> 1:23 2:23  <b>viewed</b> 48:5  <b>virtue</b> 134:17  <b>visit</b> 43:14,15 44:21  98:18,21 100:5  104:8  <b>visited</b> 44:19 99:19  <b>visitor</b> 99:10 100:7  <b>volunteer</b> 73:19  <b>vs</b> 1:4</p>
--	--	---	---



<b>w</b>	<b>war</b> 136:17	<b>witold</b> 1:19 4:13 116:15	<b>wrong</b> 122:2,3
<b>wait</b> 10:18 28:11 73:14	<b>warner</b> 2:3	<b>wonder</b> 88:25	<b>wrote</b> 53:24 69:9 100:23,25 103:9
<b>waiting</b> 9:14 97:13 109:10	<b>water</b> 4:18 25:16 26:8	<b>wondering</b> 129:22	<b>x</b>
<b>walczak</b> 1:19 4:10 4:11,12,13,13,17 5:6,10 9:6,9,11,18 9:21,25 10:8,10,13 10:14,20,23 12:16 12:24 17:8 34:9,12 34:15,21,23,24 35:5 35:7 38:12 40:2 41:8 46:9,16,20,22 47:2,5,9 48:4,5,10 48:11 51:22,24 52:2 55:17,20 56:24 57:1 57:23 58:1,18 60:25 81:5,8,10 89:9,20 89:21 108:19 113:23,24 115:5,8 116:4,16,19 117:14 117:22 129:8 130:16 145:11,13 145:24	<b>way</b> 15:5 38:6,8 50:1,22 56:18 71:6 82:16 115:4 116:18 122:18 130:8 137:2 141:20 143:22	<b>word</b> 105:4	<b>x</b> 3:1,8 17:18
<b>walk</b> 29:13	<b>ways</b> 63:21 107:16 126:6	<b>words</b> 51:18 56:14 67:19 79:3 112:5 119:14	<b>y</b>
<b>walked</b> 23:16 91:15	<b>we've</b> 16:14 62:13 80:15 84:16,24 105:23 118:9 125:11	<b>wore</b> 68:2	<b>yeah</b> 9:21 34:12 56:11 81:5,23
<b>wall</b> 72:2 73:12,25 74:4 86:18	<b>wear</b> 76:21,22 77:6 77:17,18,20,25	<b>work</b> 6:4 25:8 36:12 38:19 63:3 66:17 67:5 73:7,9,10 76:5 78:10 82:20 120:7	<b>year</b> 23:4 85:16 97:17 124:13 130:21 138:8,18
<b>walnut</b> 1:15	<b>website</b> 43:15 44:12	<b>worked</b> 9:2 23:15 35:25	<b>years</b> 49:22 120:24 130:23 131:16 140:23 141:2
<b>want</b> 8:2 9:17 12:25 22:3 24:22 25:7 30:19,19 34:13 37:20,24 39:22 41:23 85:10 88:23 90:16 92:18 98:2 102:3 111:24 135:4 139:9	<b>websites</b> 44:18,22 83:7	<b>worker</b> 8:24 23:13 23:16 29:9 32:12 37:11,13 38:4 50:10 70:14 124:4,5,6 126:2,3 127:15 130:17 141:8	<b>yesterday</b> 5:15 46:18 122:1,9,14 123:6
<b>wanted</b> 10:20 40:13 41:16 62:22,23 92:10 93:16,18 95:12 98:19	<b>weird</b> 102:13	<b>worker's</b> 21:17	<b>young</b> 36:13 143:9
<b>wants</b> 25:8 37:17 135:6 137:21 139:4	<b>welcome</b> 145:15	<b>workers</b> 19:2 141:10	<b>younger</b> 25:3,4 28:20 29:4 68:24
	<b>went</b> 6:20 29:6,12 42:12 43:24 70:11 73:22 82:16 91:6 96:20 101:22	<b>working</b> 38:23 105:13 115:19 116:1 118:13 122:24 128:3 145:3	<b>youngest</b> 24:3
	<b>whatnot</b> 111:21	<b>works</b> 23:19 91:18	<b>z</b>
	<b>whatsoever</b> 134:12 134:13	<b>world</b> 119:18,20,21 119:23 141:5,11	<b>zero</b> 13:4
	<b>willing</b> 36:12 133:5 134:20 138:12	<b>would've</b> 7:25 11:3 13:23 14:7 15:23 22:22,23 26:8 32:2 43:9 58:15 60:21,21 66:8 69:24	<b>zeros</b> 13:2
	<b>willis</b> 62:8	<b>wound</b> 38:9	
	<b>wish</b> 117:10	<b>wrist</b> 73:9,10,18 74:2	
	<b>withdraw</b> 138:25	<b>write</b> 52:23	
	<b>withdrawing</b> 101:24	<b>writing</b> 15:12,17 18:1 31:9 36:11 99:21,24 113:18	
	<b>witness</b> 3:2 4:17,22 5:2,8,15 10:7,8 17:7 38:2,7 41:2,6 46:4,8 46:14,17 50:25 51:8 51:12 56:8,18,25 57:22,24 58:13 60:17 89:18,18 108:15,17 118:4 129:11 145:20	<b>written</b> 11:25 51:4 86:22 103:7 121:18	