

2014-2015 Nevada High School Mock Trial Competition

Pierce Ivory

v.

Castle College and Morgan Pettigrew

**Co-Sponsored by:
The School Districts of Nevada
And
Law Related Education**



The Nevada Mock Trial Board thanks the Oklahoma Bar Association and the Oklahoma Bar Foundation for permission to utilize the case, which was adapted by Christine Cave, Nicole Longwell, Erin Moore, Dan Couch, and Melissa Percos of the Oklahoma Bar Association's Mock Trial Case Development Committee and based upon an original problem created by the Delaware Law-Related Education Center. The case has been edited for Nevada by Andrew Craner, Lisa McAllister, and David F. Sarnowski.

**This fictional case includes sensitive material, including references to
domestic violence, child abuse, and parental suicide.**

The Mock Trial Board hopes you find these materials interesting and educational. We wish you the best of luck at competition!

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STIPULATIONS

The parties have stipulated as follows:

1. All witness statements, exhibits, and the signatures thereon are authentic.
2. Jurisdiction, venue, and chain of custody of the evidence are proper.
3. Whenever a rule of evidence requires that reasonable notice be given, it has been given.
4. For the purposes of this case only, Mock Trial Rule 19 shall be considered modified to allow teams representing the Plaintiff to seat Pierce Ivory at Plaintiff's counsel table and teams representing the Defendants to seat Morgan Pettigrew at Defendants' counsel table. Each such party is allowed to communicate with counsel at the table. No other witnesses may be seated at either counsel table.
5. A minor's capacity to enter into a binding contract is not an issue in this case since Pierce Ivory was over the age of eighteen at the time of Castle College's offer and his/her subsequent acceptance of the offer.
6. A potential expert witness does not need to be "certified" as an expert by the judge as a prerequisite to proffering testimony as an expert. However, sufficient foundation must still be laid as required by Mock Trial Rule of Evidence 702 to allow the witness to testify as an expert witness.
7. The trial will be bifurcated. Only liability will be addressed in this phase of the trial. Damages, if any, will be determined in a subsequent proceeding.
8. Attorneys should feel free to address the scoring judges as though they are the jury.

Witness and Exhibit List

The following witnesses shall be called by the parties.	
FOR THE PLAINTIFF	FOR THE DEFENSE
Pierce Ivory	Paxton Mason
Professor Emerson Clark	Morgan Pettigrew
Dr. Kennedy Kunningham	Dr. Harper Sawyer
<i>All attorneys may call their respective witnesses in any order.</i>	
The following exhibits may be used by teams in competition. They are pre-marked and are to be referred to by number as follows:	
EXHIBIT NUMBER	EXHIBIT NAME
1	Letter of Admissions to Pierce Ivory
2	Signed Acceptance of Admission and Scholarship
3	Letter of Expulsion to Pierce Ivory
4	Application for Undergraduate Admission (excerpt)
5	Castle College Code of Conduct (excerpt)
6	Dr. Harper Sawyer's Article on Psychiatric Disorders
7	Article/Discussion on Bipolar Disorder
8	Morgan Pettigrew's Facebook Post Regarding Pierce Ivory
<i>The exhibits can be introduced in any order.</i>	

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IN THE 15TH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF RUBY

PIERCE IVORY,

Plaintiff,

vs.

CASTLE COLLEGE and
MORGAN PETTIGREW,

Defendants.

Case No. CV2014-00145
Dept. No. XLVIII

COMPLAINT

Trial By Jury Demanded

COMES NOW Plaintiff, Pierce Ivory, and complains against Defendants Castle College (hereinafter "College") and Morgan Pettigrew as follows:

GENERAL ALLEGATIONS

1. Plaintiff Pierce Ivory is an adult resident and a citizen of Newport, Nevada. .
2. College is a Nevada corporation which operates as a private educational facility in Ruby County, Nevada.
3. Morgan Pettigrew is a resident of River City, Nevada.
4. All acts at issue here occurred in and around Ruby County, Nevada.
5. Venue and jurisdiction are appropriate for this court.
6. On March 15, 2012, Plaintiff Pierce Ivory received an acceptance letter from the College awarding a full tuition scholarship based on the Plaintiff's outstanding academic achievement in high school. *See* March 15, 2012, letter attached hereto as Exhibit 1 and incorporated by reference herein.
7. Plaintiff accepted the scholarship and made plans to and did attend the College in the Fall of 2012.

8. In the Spring semester of 2014, without cause, the College revoked Plaintiff Pierce Ivory's scholarship and permanently expelled Pierce Ivory from the College. See April 21, 2014, revocation letter attached hereto as Exhibit 2 and incorporated by reference herein.

**FIRST CAUSE OF ACTION
(Breach of Contract Against Castle College)**

9. Plaintiff incorporates the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

10. The revocation of Plaintiff's scholarship and expulsion from the College is a breach of the contract between Plaintiff and College, which was created through the offer of the scholarship, Plaintiff Pierce Ivory's acceptance of the scholarship, and Plaintiff Pierce Ivory's successful enrollment at the College.

11. Plaintiff Pierce Ivory has not breached any of the terms of the scholarship nor has Plaintiff breached any of the written or published policies of the College.

12. The outrageous and intentional conduct of the College in revoking Plaintiff's scholarship and permanently expelling the Plaintiff has caused Plaintiff actual damage, including but not limited to, embarrassment, humiliation, pain and suffering, public ridicule, mental and emotional distress, including physical manifestations of such distress, loss of financial benefits, and a significant delay in educational pursuits including expenses relating to application and transfer.

**SECOND CAUSE OF ACTION
(Defamation/Slander Against Morgan Pettigrew)**

13. Plaintiff incorporates the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

14. The College has, without cause, revoked the scholarship and permanently expelled Plaintiff Pierce Ivory from school.

15. Defendant Morgan Pettigrew has made statements regarding such expulsion and Plaintiff's past, which were designed and had the intent and outcome of affecting Plaintiff's ability to obtain admission to another academic institution, to obtain future jobs which have had, and will continue to have, a significant detrimental economic and educational impact upon Plaintiff Pierce Ivory.

16. Such statements have also been published verbally and in writing at various times through e-mails and other forms.

17. Such malicious and wanton conduct on the part of Defendant Morgan Pettigrew has resulted in slander and defamation of Plaintiff Pierce Ivory and this conduct has caused Plaintiff actual damages including, but not limited to, embarrassment, humiliation, pain and suffering, public ridicule, mental and emotional distress, including physical manifestations of such distress, loss of financial benefits and delay in education pursuits.

18. Defendant Morgan Pettigrew's actions and conduct were malicious and intentional and give rise to punitive damages.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff Pierce Ivory respectfully requests the following relief:

- a. A judgment for Pierce Ivory and against Castle College on his/her breach of contract claim;
- b. A judgment for Pierce Ivory and against Morgan Pettigrew on his/her defamation/slander claim;
- c. For damages in an amount to be established at trial; and
- d. For such other and further relief as this Court may deem just and proper.

DATED: August 29, 2014.

LIONEL HOLLAND & DARROW, LLC

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IN THE 15TH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF RUBY

PIERCE IVORY,

Plaintiff,

vs.

CASTLE COLLEGE and
MORGAN PETTIGREW,

Defendants.

Case No. CV2014-00145
Dept. No. XLVIII

ANSWER

Trial By Jury Demanded

Defendants, Castle College and Morgan Pettigrew, answer Plaintiff's Complaint as follows:

GENERAL ALLEGATIONS

1. Defendants deny the allegations contained in Paragraph 1 for lack of information upon which to form a belief.
2. Defendants admit the allegations contained in Paragraph 2.
3. Defendants admit the allegations contained in Paragraph 3.
4. Defendants admit that all alleged acts occurred in and around Ruby County, Nevada.
5. Defendants admit the allegations contained in Paragraph 5 but deny that any claim is appropriate.
6. Defendants admit the allegations contained in Paragraph 6.
7. Defendants admit the allegations contained in Paragraph 7.
8. Defendants admit that the Plaintiff's scholarship was revoked and Plaintiff was expelled, but denies all other allegations contained in Paragraph 8.

**FIRST CAUSE OF ACTION
(Breach of Contract Against Castle College)**

9. Defendants incorporate by reference their responses to the allegations in the preceding paragraphs as if set forth fully herein.

10. Defendant College denies the allegations contained in Paragraph 10.

11. Defendant College denies the allegations contained in Paragraph 11.

12. Defendant College denies the allegations contained in Paragraph 12.

**SECOND CAUSE OF ACTION
(Defamation/Slander Against Morgan Pettigrew)**

13. Defendants incorporate by reference their responses to the allegations in the preceding paragraphs as if set forth fully herein.

14. Defendant Morgan Pettigrew admits that Plaintiff has been expelled from Castle College, but denies the remaining allegations contained in Paragraph 14.

15. Defendant Morgan Pettigrew denies the allegations contained in Paragraph 15.

16. Defendant Morgan Pettigrew denies the allegations contained in Paragraph 16.

17. Defendant Morgan Pettigrew denies the allegations contained in Paragraph 17.

18. Defendant Morgan Pettigrew denies the allegations contained in Paragraph 18.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

Plaintiff's Complaint on file herein fails to state a claim upon against Defendants upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

All statements made by Defendant Morgan Pettigrew regarding Plaintiff Pierce Ivory are true.

THIRD AFFIRMATIVE DEFENSE

Castle College's non-performance of the contract is justified and/or excused by Plaintiff Pierce Ivory's prior breach of contract.

FOURTH AFFIRMATIVE DEFENSE

Plaintiff Pierce Ivory used fraud to obtain an offer from Castle College for his/her admission and a scholarship.

FIFTH AFFIRMATIVE DEFENSE

Plaintiff Pierce Ivory has failed to mitigate damages.

WHEREFORE, Defendants pray for relief as follows:

1. That Plaintiff Pierce Ivory take nothing by way of his/her Complaint on file herein;
2. That Defendants be dismissed, with prejudice; and
3. For such other and further relief as the Court deems just, equitable, and proper.

DATED: September 12, 2014.

FLORRICK AGOS & LOCKHART, LLP

/s/ Alicia Florrick

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JURY INSTRUCTIONS

[Not to be read in open court]

Members of the Jury:

This is a civil case brought by Pierce Ivory against Castle College and Morgan Pettigrew.

BURDEN OF PROOF BY A PREPONDERANCE OF THE EVIDENCE

In a civil case such as this one, the burden of proof is by a preponderance of the evidence. Proof by a preponderance of the evidence means proof that something is more likely than not. It means that certain evidence, when compared to the evidence opposed to it, has the more convincing force and makes you believe that something is more likely true than not. Preponderance of the evidence does not depend on the number of witnesses. If the evidence on any particular point is evenly balanced, the party having the burden of proof has not proved that point by a preponderance of the evidence, and you must find against the party on that point.

CONTRACT FORMATION

A contract is a legally binding agreement between two or more parties. Each party to the contract must perform according to the agreement's terms. A party's failure to perform a contractual duty constitutes breach of contract. If a party breaches the contract and that breach causes injury or loss to another party, then the injured party may claim damages.

For a legally binding contract to exist, there must be:

- 1) an offer of a contract by one party;
- 2) an acceptance of that offer by the other party;
- 3) consideration for the offer and acceptance; and
- 4) sufficiently specific terms that determine the obligations of each party.

CONSIDERATION

Consideration is something of value received by someone which induces them to make a promise to the person giving the thing of value. To be enforceable, a contract must be supported by consideration. Consideration may include money, an act, a promise not to act, or a return promise, and it may be found anywhere in the transaction, whether or not it is clearly stated or spelled out in writing as "consideration."

BREACH OF CONTRACT

In this case, Pierce Ivory alleges that Castle College breached a contract by revoking Pierce Ivory's scholarship and expelling him/her from Castle College. You must determine whether Pierce Ivory has proven by a preponderance of the evidence that:

- 1) a legally binding contract was formed between Pierce Ivory and Castle College and;
- 2) that one or more terms of Pierce Ivory's contract with Castle College have not been performed by Castle College.

DEFENSE OF EXCUSED NON-PERFORMANCE

Castle College's performance under the contract at issue is justifiably excused if you conclude that Castle College has proven by a preponderance of the evidence that Pierce Ivory materially breached the contract at issue.

DEFENSE OF FRAUDULENT INDUCEMENT

If you believe Castle College has proven that Pierce Ivory fraudulently induced it to sign the contract at issue, then Castle College is not liable for breach of contract. To prove fraudulent inducement, Castle College must prove that:

- 1) Pierce Ivory made a false representation of material fact;
- 2) Pierce Ivory knew the representation was false;
- 3) Pierce Ivory intended to induce Castle College to sign the contract at issue; and
- 4) Castle College's action or inaction was taken in justifiable reliance upon the representation.

DEFAMATION

Defamation is a communication that tends to injure a person's "reputation" in the ordinary sense of that word; that is, some statement or action that diminishes the esteem, respect, goodwill, or confidence in which the person is held and tends to cause bad feelings or opinions about the person. Defamation necessarily involves the idea of disgrace. In this sense, a communication is defamatory if it tends to lower the person in the estimation of the community or if it deters third parties from associating or dealing with the person defamed.

Defamation only occurs when the defamatory information is communicated to someone other than the person to whom it refers. In the law, this is known as "publication."

LIBEL AND SLANDER

In general, libel is written defamation. Slander is oral defamation.

ELEMENTS OF DEFAMATION

Pierce Ivory has the burden of proving by a preponderance of the evidence all facts necessary to establish both of the following elements of his/her claim:

- 1) that Morgan Pettigrew defamed him/her; and
- 2) that the defamation has been published.

TRUTH OR SUBSTANTIAL TRUTH AS A DEFENSE

It is an absolute defense to a claim of defamation that the alleged defamatory statements were substantially true at the time the statements were made. Thus, even if you find that Morgan Pettigrew made defamatory statements about Pierce Ivory that proximately caused injury to Pierce Ivory, you cannot award damages if you find that the statements were substantially true. The alleged defamatory statements do not have to be absolutely true for Morgan Pettigrew to successfully assert this defense. Substantially true statements are not defamatory. To determine if a statement is substantially true, you must determine if the alleged defamation was no more damaging to Pierce Ivory's reputation than an absolutely true statement would have been. In other words, if the "gist" or "sting" of the allegedly defamatory statement produces the same effect in the mind of the recipient as the precise truth would have produced, then the statement is "substantially true" and you cannot award damages to Pierce Ivory for the statement.

To prevail on this defense, Morgan Pettigrew bears the burden of proving by a preponderance of the evidence that the alleged defamatory statements were true or substantially true.

GENERAL INSTRUCTIONS

You alone are the judges of the credibility of the witnesses and the weight to be given to the testimony of each of them. In determining the credit to be given any witness, you should take into account her/his truthfulness or untruthfulness, her/his ability and opportunity to observe, her/his memory, her/his manner while testifying, any interest, bias or prejudices she/he may have, and the reasonableness of her/his testimony considered in the light of all the evidence in the case.

You should consider each opinion received in evidence in this case and give it the weight you think it deserves. If you conclude the reasons given in support of the opinion are not sound or that for any other reason an opinion is not correct, you may disregard that opinion entirely.

The law governing this case is contained in these instructions, and it is your duty to follow the law. You must consider these instructions as a whole. You must not pick out one instruction or parts of an instruction and disregard others.

You are the sole judges of the facts in this case. It is your duty to determine the facts from the evidence produced here in court. Your verdict should not be based on speculation, guess, or conjecture. Neither sympathy nor prejudice should influence your verdict. You are to apply the law as stated in these instructions to the facts as you find them, and in this way decide the case. You must not concern yourself with the consequences of your verdict.

Your verdict must represent the considered judgment of each juror. In order to return a verdict, it is necessary that each juror agrees. Your verdict must be unanimous. It is your duty to consult with one another and try to reach an agreement. However, you are not required to give up your individual judgment. Each of you must decide the case for yourself, but you must do so only after an impartial consideration of the evidence with your fellow jurors. During your deliberations, do not hesitate to re-examine your own view and change your opinion if you are convinced it is erroneous. But, do not surrender your honest conviction as to the weight or effect of evidence solely because of the opinion of your fellow jurors, or to reach a verdict. You are the judges of the facts. Your sole interest is to ascertain the truth from the evidence in the case.

You will now retire to the jury room and select one of you to act as foreperson. That person will preside over your deliberations and will speak for the jury here in court. Forms of verdict have been prepared for your convenience. You will take these forms to the jury room; when you have reached unanimous agreement as to your verdict, the foreperson will sign the forms which express your verdict. You will then return all forms of verdict, these instructions, and any exhibits to the courtroom.

The preceding instructions are intended to provide students with a general background into the conventional principles of law. They are provided solely for purposes of this Mock Trial Problem and should not be utilized or relied upon for any other purpose. The law governing this Problem may not reflect actual principles of Nevada law.

1 **STATEMENT OF PIERCE IVORY**

2 My name is Pierce Ivory. I am currently a resident of Newport, Nevada. I consider Newport to be my
3 hometown because it is where my grandmother lives. However, I was born and raised in Dinkla, California. I
4 am 21 years old. I graduated high school from the Loomis Chaffee School in Windsor, California in 2012 and I
5 was in my sophomore year at Castle College in River City, Nevada until April 2014 when I was expelled without
6 just cause.

7 I admit that I did not disclose that I poisoned my mother in my admission application to Castle College.
8 The application specifically asked whether I had ever been convicted of any felony. The answer to that is “No.”
9 Although the application provides an opportunity to explain circumstances related to a prior conviction, I did not
10 see a need to provide details since the initial answer was “No”.

11 I mentioned to Professor Clark that I had a troubled childhood and asked whether she//he saw any need
12 to provide details. Although Professor Clark told me that was not necessary, I insisted that she/he contact
13 someone farther up the food chain to give me a complete assurance that additional information was not
14 necessary. In my presence and at my behest, Professor Clark phoned President Mason. I was informed that
15 further details were not necessary and that if anything came up prior to the interview process regarding the
16 Bidwell Scholarship, I could provide an explanation and details at that time.

17 By the time I was in my senior year of high school, the incident regarding my mother was a thing of the
18 distant past. It was like it was someone else’s story or something out of a bad movie I had watched. I have done
19 what the State of California required and that my doctors have asked of me: I take my medication; I go to
20 therapy; and I avoid situations that might trigger something from my past. I am a different person now and
21 should not be held accountable for events that happened almost ten years ago.

22 Since I was expelled from Castle College, I moved back to Newport and initially into my Grandmother’s
23 house to be close to her and to my doctor and to a happier place in my life. My medicine keeps me level now. I
24 take Lithium and Zyprexa on a daily basis, even though the Zyprexa sometimes hurts my stomach. I see Dr.
25 Kennedy Kunningham every Wednesday.

1 Dr. Kunningham is very nice to me and has encouraged me to go on with my education. Before this
2 mess, I was planning on becoming a psychiatrist like Doc. I was still seeing Doc even after I began classes at
3 Castle when I could, but I missed a lot of appointments since I was attending school in River City.

4 I was very busy with school so I probably only saw Doc 6 or 7 times during the entire period I was
5 enrolled at the College. But I kept up my grade point average and achieved a perfect 4.0 after three semesters. I
6 was also quite active with the college mock trial team and in student government. The responsibilities of the
7 Bidwell Scholarship kept me quite busy as well. Every week, and certainly every weekend, there was a different
8 event that I was expected to attend. I ran for and was elected to a seat in the Castle Student Senate during my
9 last semester, Spring 2014. I ran against a fellow sophomore, Morgan Pettigrew, for the opening. Morgan took
10 the defeat very hard. We never were on the best of terms with one another- we butted heads occasionally in
11 classes- but did not run in the same social circles. I know that Morgan is heavily invested in that cult-like co-ed
12 fraternity, Sigma Lambda Upsilon, and also has Mommy to fight his/her battles. Sometimes that arrogance and
13 sense of entitlement is a little hard to take. Get that silver spoon out of your mouth and move on, I say.

14 As a term of my agreement with the State of California, I am required to visit a psychiatrist on a regular
15 basis. At this point in my life, I would do that anyway, especially if the psychiatrist is someone like Dr.
16 Kunningham who has been a real godsend. Dr. Kunningham has helped me realize that my actions at age 12
17 were not my own and that I can move past that and be a better person. I know it sounds a bit hokey, but that is
18 just the type of affirmation that I need. I admit to being really depressed after Castle College threw me out.
19 Although I am getting better and want to move on, I do not know if I can after what Castle College did to me. I
20 am currently living on my own in an apartment and holding down two jobs. I am a "barista" at Coits (i.e., a car
21 hop serving root beer) and a customer service representative at Hertz. Obviously this is a severe step down from
22 being a Bidwell Scholar at a prestigious liberal arts college. I hope my life has more to offer than selling root
23 beer and rental cars.

24 When I was 12 years old, I killed my mother. I poisoned her by putting rat poison in her tea. I know
25 now that what I did was very wrong and I deeply regret the action that I took. At the time, I saw no other way

1 out. That does not excuse my behavior and I would tell anyone now not to repeat the same mistake that I have
2 made. This is why I wanted to go to college and become a psychiatrist-so that I could counsel other children and
3 youth that no matter what your problems are or how difficult your home life is there are always people who want
4 to help.

5 My mother was horrible to me. She would be nice to me if I received the highest grade, but would beat
6 me severely if I did not get the highest grade. My father committed suicide when I was four years old and my
7 mother blamed me for my father's death. My mother used his death to make me do what she wanted: study,
8 clean house, cook, do the laundry, and walk three miles to the store to buy her cigarettes. My mother told me I
9 could not go outside and play with other kids, join any activities at school, or talk to other kids on the phone.
10 She often locked me in my room and punished me if I cried. I feel that I have been a victim my whole life, first
11 my dad – he left me alone in the world – then my mom who abused me my whole life, and now the college. I
12 really thought that being on my own and going to college would help me get past all of these troubles and make
13 me a stronger person. But as you can see, the school is just trying to destroy me.

14 I was 12 years old when I put the poison in my mother's tea. My mother was in a horrible mood and I
15 was in her way again so she beat me, sent me to my room, and refused to let me eat dinner. I was starving
16 because I had not eaten at all that day, so I snuck into the kitchen and poured a glass of milk and grabbed some
17 crackers to make the hunger pains stop. Unfortunately, I accidentally left the milk out. My mother saw the milk
18 next morning and went crazy. She whipped me with my own belt, locked me in my room, and went to the store.
19 I knew that something had to change or I was going to end up dead.

20 When my mother returned, she unlocked me and ordered me to make her a cup of tea to calm her nerves.
21 That is when I did it. I am not sure whether I planned on killing my mother or just creating an opportunity to
22 make my escape – I just knew I needed a way out.

23 Under California law, I could not be tried as an adult. As a juvenile, the only legal recourse was to put
24 me in a juvenile detention facility until I was 18. However, the District Attorney, my lawyer, and some really
25 good doctors came up with an agreement that would help me get better and keep me from suffering from the

1 stigmas of having a conviction. The deal meant that I agreed to a juvenile conviction for assault, but that
2 my sentence would be deferred if I agreed to be supervised in a state facility, the Shipley Institute, for two years,
3 and then undergo regular psychiatric counseling and treatment until I was 18. After I turned 18, my attorney and
4 the District Attorney collectively petitioned the Court to expunge my juvenile conviction because I completed
5 everything that I was asked to do. The Court granted the Petition. According to my attorney and the District
6 Attorney, it is as if the juvenile conviction never existed. Since this all happened before I filled out the
7 application for Castle College, I responded “No” to the question asking if I had ever been convicted of a crime.

8 As soon as I was eligible for release from the Shipley Institute, I moved to Nevada to be with my
9 paternal grandmother. To get my past behind me, we hired a lawyer to officially change my name from Chris
10 Crawford. I chose Pierce Ivory because it sounded clean and pristine where once I had been confined as a
11 prisoner or slave. With my new name in place, I attended prep schools in Nevada. I also applied for and was
12 admitted to Castle College in Nevada as Pierce Ivory.

13 At prep school, especially at Loomis Chaffee, I immersed myself in my studies. I was always rather
14 “bookish,” since it was one of the few things that would take me away from the horrible reality I lived with. I
15 resolved to overcome my past and to make something out of myself. I convinced myself that through my
16 studies, I could succeed. However, I am not so sure of that anymore, since my studies brought me to Castle and
17 to this mess. At Loomis, I was top of my class. Academics came easy for me. I did not receive any grades
18 lower than an A and achieved perfect scores on both the SAT and ACT tests. This led to my recruitment by
19 many colleges and universities. I talked to Kennedy and to Jane Lorentzen, my high school counselor, about the
20 various options and what might be best for me given my situation. Both Kennedy and Ms. Lorentzen convinced
21 me that a small college out of the way somewhere might be just the thing and I agreed with their
22 recommendations. Thus, I started looking more seriously at those liberal arts colleges that were coming to call.
23 That is about when I heard of Castle College and Professor Clark.

24 Professor Clark did a really nice sales job describing the ideal college and the tremendous opportunities
25 that the Bidwell Scholarship might provide. I saw the Scholarship as a great move in my life. However, I was

1 still a little apprehensive. Without the full scholarship, I probably would not have moved out of Windsor and the
2 safety net I had constructed for myself. I had plenty of great offers a lot closer to home, but none matched what
3 Castle College could provide.

4 As I stated earlier, I made sure that there would not be any problems or complications about my past in
5 my application to Castle. When I accepted the offer of admission and the Bidwell Scholarship, I signed a
6 document confirming I would abide by the College's Code of Conduct and that is exactly what I did throughout
7 my time at Castle.

8 I knew that winning the Bidwell Scholarship was not a done deal by any means. I went to River City in
9 January of 2012 for a series of interviews and campus events. I thought they all went well. Nonetheless, there
10 was some unexpected, rather hostile questioning by one of the Trustees. I did not know at the time that her child
11 was up for the same scholarship.

12 My first year on campus was great. I was kept extremely busy, but I had great classes, great professors,
13 and a great room in the dorm all to myself. My professors encouraged involvement in class. This was
14 something that I was very used to from Loomis. Whenever possible, I challenged my teachers and other
15 students. This type of academic jousting really gives me a jolt. The college offered a lot of great opportunities
16 and I took advantage of as many of them as I could. There were a few missteps along the way. For example,
17 early in my first semester, a history professor assigned a genealogy project. I really didn't want to go there, so I
18 asked for an alternate assignment. The professor was all too glad to give me something else to do. There were a
19 few set-tos in the dorm as well. I have rather eclectic taste in music and when I'm letting off some steam, I like
20 to play it loud. I go for everything from the smooth jazz of The Kevin Bacon Experience to the hip-hop stylings
21 of Fresh N' Easy to the punk sounds of the Misfits. My tastes and the volume never really bothered anyone in
22 high school, but a few of the students in my hall would bang on my door and tell me to change my tune or tone it
23 down. I think this is normal for college – learning to live with others.

24 My second year at Castle was a bit more challenging. I still had tremendous opportunities. For example,
25 I assisted Professor Harper Sawyer on her/his new book and I still attended a lot of high-brow gatherings, both at

1 the college and throughout the region. I am not sure why, but Morgan Pettigrew really started to take issue with
2 me. As I said, Morgan and I did not run in the same social circles. Morgan had convinced most of her/his Sigma
3 Lambda Upsilon friends to challenge me as well. In the classroom this was fine, but outside of the classroom it
4 really started to get old. I guess lots of the other students felt picked on by the group though since I won the
5 Senate election as what pretty much became a referendum over Sigma Lambda Upsilon. I did not want to seem
6 anti-social and I didn't want it to appear like I was holding a grudge. Thus, I attended a couple of parties at the
7 Sigma Lambda Upsilon house. I remember the Halloween Party even had an appearance by the grim reaper!

8 I do not recall many details about any of the parties, although I heard that someone said that I was acting
9 weird – how? By sitting alone, taking a break and nodding my head to the music? By mosh pit dancing to a
10 great tune? I remember that “Flowers of the Floral Variety” comment. It was one of those “oops” moments
11 when you did not realize the music had stopped and you kept going?! “Flowers of the Floral Variety” was a real
12 inside joke from my time at Loomis. Something in the music that was playing reminded me of that, so I just
13 belted it out. It probably made me look a little strange, but no more than the kids running around in togas
14 playing a game of keg ball freeze tag.

15 I guess the end came in a psychology class that I was taking with Professor Gossmann. Morgan was in
16 that class as well. When the professor assigned special presentation topics, I did not really think anything of it.
17 But when Morgan came in with a Power Point presentation of my past, I kind of lost it. I did not expect Morgan
18 to make any connection to me from that incident, but it apparently gave her/him the idea to do a little “research”
19 – like hack into my records and illegally access academic and court documents. If anyone should be expelled for
20 dishonesty, it should be Morgan Pettigrew!

21 I worked hard to put my past behind me and to create a new life and a new future. Now that is all gone.
22 My reputation is ruined and my good work is wasted. Since Morgan went public, not just within the college and
23 the immediate community, but national with his/her Facebook page, there is no place that I can go and not be
24 recognized and ridiculed.

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1 Since I was expelled from Castle College, I cannot sleep at night. I have these terrible nightmares about
2 people being mean to me, about my mother, and about death. I stay depressed all the time. I am anxious and just
3 do not enjoy life anymore.

4 I suffered a setback in my education when I lost that great scholarship. Getting that scholarship was a
5 dream of mine. I am humiliated and cannot face the rejection of another school.

6 I did not lie on my Castle College application or in any other setting. While at Castle College, I upheld
7 the highest standard of decorum and honor. I did not bring shame on Castle. They have done that themselves.

8 DATED: August 15, 2014.

Pierce Ivory

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1 STATEMENT OF EMERSON CLARK

2 My name is Emerson Clark. I am the Director of Admissions and a Professor of Communications at
3 Castle College in River city, Nevada. I have been with the college for 16 years, first as an assistant professor,
4 then full professor, and since 2005, as both a professor and Director of Admissions. I have an extensive
5 background in admissions procedures and regularly attend meetings of both the National Association of college
6 Admissions Counseling (NACAC) and the American Association of Collegiate Registrars and Admissions
7 Officers (AACRAO). I serve on a nationwide Blue Ribbon Panel focusing on recruitment of non-traditional
8 students and serve as an Advisor to numerous small liberal arts colleges interested in implementing scholarships
9 similar to Castle's successful Bidwell Scholars program.

10 More than one hundred years ago, the Bidwell family endowed the Bidwell Scholars Program, a special
11 scholarship program designed to entice the best and brightest students and the most promising future leaders to
12 attend Castle. The family placed no restrictions on who should receive the award, but to bolster its prestige,
13 limited the scholarship to a single student in each entering freshman class. The selected student receives full
14 room, board, tuition, and expenses for four years. In addition, the student receives a generous monthly stipend
15 and invitations to attend special receptions, conferences, seminars, workshops, and similar events throughout
16 Nevada and the Southwest. In sum, These Bidwell Scholars represent Castle College on a grand stage and are, in
17 turn, groomed for leadership in the community, in the state, and in the nation. The Bidwell Scholars Program
18 has become one of the preeminent scholarship programs in the nation and is highly competitive. Out of the
19 thousands of potentially qualifying students each year, we select 12 as finalists, and invite them to campus for an
20 extensive series of interviews.

21 The Admissions Office regularly receives reports on students who receive perfect scores on their SATs
22 and/or ACTs. This alerts our recruiters to contact these students and to provide information to them about Castle
23 College. In the Fall of 2011, I was notified by our California regional officer of a student attending the Loomis-
24 Chaffee School who achieved a perfect score on both the SAT and the ACT and who maintained a perfect grade
25 point average. I instructed the officer to make contact with Pierce Ivory directly and to determine if Mr./Ms.

1 Ivory might be interested in our college. Pierce confessed to the admissions officers that she/he had not heard of
2 the college, but upon the advice of the Loomis-Chafee School Guidance Department, was encouraged to seek out
3 more information. I immediately drove to Windsor to meet Pierce Ivory.

4 Pierce is a truly remarkable individual. Brilliant academically with a depth of knowledge rivaling many
5 graduate students on such a wide variety of topics combined with a terrific personality. I have never had the
6 privilege of meeting a more complete young person who is engaging, self-effacing, confident, poised and
7 charismatic. At our first meeting, I knew that Pierce would be one of the dozen Bidwell Scholar finalists. I also
8 knew that I had a big sales job ahead of me to convince Pierce that River City, Nevada was the place to spend
9 the next four years of his/her life. Early on in our conversations, Pierce hinted at what she/he characterized as a
10 “troubled past.” I did not press the issue for fear of scaring such a qualified student off, but did ask whether
11 there were criminal charges involved. Pierce indicated that technically there was no existing criminal record. I
12 suspected that she/he had been involved in either shoplifting, petty theft of some sort or had been involved in
13 some sort of motor vehicle incident. These and alcohol related incidents are by far the most common infractions
14 among high school students. I assured Pierce that any minor infraction would not adversely influence our
15 scholarship decision. She/he seemed insistent that I clear this issue with top ranking college officials. Thus, I
16 called President Mason while in the room with Pierce and relayed the information that she/he provided to me.
17 President Mason chuckled and said to me, “Emerson, if this student is as good as you claim, I do not think a little
18 booze or a minor traffic violation is going to be a problem. Bring this kid in. I want to meet him/her.”

19 Each January, the 12 Bidwell Scholar finalists are invited to campus for a series of meetings and
20 interviews with college officials, benefactors, faculty, staff, and students. Things were a little different in 2012
21 since we had 13 finalists – the 12 identified by the Admissions staff and one “legacy”. I participated in a number
22 of events and interviews with the 13 finalists, including Pierce Ivory who immediately impressed me as being
23 head and shoulders above the other finalists. Of course, I was not privy to the private interviews that the students
24 held with President Mason, the Board of Trustees, or the Castle College Honor Council, all of whom have
25 influential voices in the final selection. As I expected, Pierce was selected as the Bidwell Scholar. However, I

1 was surprised by the apparent closeness of the vote. Tallies are never made public, but anonymous sources close
2 to the selection process told me that it took a number of ballots before Pierce emerged as the choice. I have my
3 suspicions about the influence of a certain Trustee, but this is neither the time nor the place for that type of
4 speculation.

5 In addition to my duties as Director of Admissions, I am a Professor in the Department of Journalism
6 and teach classes and seminars on mass communication. Every Fall, I conduct an honors seminar in mass media
7 for select freshmen. Pierce Ivory participated in the seminar during Fall 2012. She/he did not disappoint. Pierce
8 frequently led discussions and offered astute analysis, which is remarkable really for someone so young. While
9 most new college students need to be coaxed along to participate in seminar-style settings, Pierce thrived on the
10 format. Pierce offered his/her own observations and made all of the other students feel comfortable in
11 contributing. There were times during that seminar when I could literally step back and let the conversation flow
12 because of Pierce Ivory. I admit to patting myself on the back for finding such a gem of a student and then
13 convincing her/him to attend Castle.

14 In the Fall 2013, I again had Pierce as a student in a more lecture-oriented Media and Politics class. Morgan
15 Pettigrew was also in that class. Morgan attempted to control the discussion and steer the other students to
16 his/her unique political viewpoint, but Pierce refused to go along. She/he engaged in some rather pointed
17 exchanges with Morgan. Often, the points of argument went against what Pierce had espoused in my earlier
18 seminar. It appeared to me that Pierce was making sport of the debate and argument; in a sense showing the
19 other students in class that it was not just okay to question political viewpoints, but that it was demanded of
20 every citizen to do so. I saw that this technique really frustrated Morgan. I really think that she/he was
21 outclassed in intellect and in oratory.

22 For someone with as strong a personality as Morgan Pettigrew, I am sure that was hard to take. Like
23 every member of the Castle College community, I was shocked by the revelation of Pierce's past. It certainly
24 shed new light on some comments and observations Pierce made to me both during the admissions process and
25 in class as a student. I do not, however, regret my championing Pierce's cause. I still believe that Pierce Ivory is

1 deserving of the Bidwell Scholarship and absolutely should be a member of the Castle College student body.
2 She/he poses absolutely no threat to other students, to faculty and staff, or to the community at large. I have
3 witnessed no signs of instability, nor any weakness of character. If anything, Pierce can serve as a shining
4 example of someone who made a mistake early in life, paid the price, overcame those challenges, and now serves
5 as a positive role model to anyone who may have faced a troubled childhood. Pierce Ivory is exactly the type of
6 student we ought to encourage at Castle, not those whom we turn away.

7 DATED: August 26, 2014

Emerson Tark

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STATEMENT OF DR. KENNEDY KUNNINGHAM

My name is Dr. Kennedy Kunningham. I received my Medical Degree from the University of California Medical School and did my residency at the University of California Medical Center. I am Board Certified in child, adolescent, and adult psychiatry and have been practicing psychiatry for 18 years. I am a member of the American Medical Association, the American Psychiatric Association, and the American Association of Child and Adolescent Psychiatry. I currently practice in Wilmington, California. My primary specialty is child and adolescent psychiatry. I rarely provide legal consulting services, but when I do it is usually at the request of the Juvenile Court. My customary fee is a flat \$300 per hour for consultation and \$450 per hour for courtroom testimony.

I am the treating psychiatrist for Pierce Ivory and have been treating Pierce for approximately seven years. Pierce functions normally and is an intelligent young adult scoring in the second deviation from the mean in terms of intelligence quotient. There is no doubt in my mind that under appropriate circumstances Pierce could become quite successful in any number of areas. As part of our ongoing psychiatric evaluation and care, Pierce has expressed remorse for killing Mrs. Crawford (his/her mother) and attempted to move on with life. Pierce has had significant success in managing his/her illness and in reaching benchmark achievements, such as completing high school and acceptance at a prestigious liberal arts college.

Pierce experiences the actions of Castle College as an obstacle in getting beyond the past and I believe Pierce's expulsion from Castle College has a significant detrimental effect on Pierce's psychiatric well-being. Since being expelled, Pierce has understandably experienced significant clinical depression, required additional medication, medication management, and balancing. Pierce feels victimized by this extremely negative college experience. Pierce's negative feelings generated by the inappropriate and unwarranted conduct of Castle College may prohibit him/her from trying again or reaching for the same heights of academic excellence. Although Pierce has overcome significant obstacles in his/her life to become a functioning and fully capable adult, he/she has been victimized by the College.

1 Information relating to psychiatric services, as well as standard medical care, is protected by stringent
2 confidentiality rules. As a practitioner, I am aware of these rules. Psychiatric information is subject to additional
3 layers of confidentiality, particularly because of the unfortunate societal prejudice against people who have
4 required psychiatric care. To breach the bounds of this confidentiality is, in my opinion, criminal.

5 I diagnosed Pierce upon beginning treatment in 2005 with my initial diagnosis being bipolar disorder
6 with psychotic features. Originally, for treatment of this disorder, Pierce took Lithium and Zyprexa. We are
7 currently working with a new regimen of medications to also alleviate Pierce's clinical depression, which I
8 believe has occurred as a result of the inappropriate treatment of Castle College. Bipolar disorder is considered a
9 major mental disorder characterized by severe mood swings which can last from several days to several weeks.
10 These mood swings may move from significant depression to elation.

11 There can be a combination of both, and behavior can be erratic for a person with bipolar disorder.
12 Many people have called it bipolar manic depressive disorder but bipolar disorder is the appropriate medical
13 terminology. Those with bipolar disorder may go several years without a major mood swing and the likelihood
14 of greater stability is increased with the proper treatment regimen, including medication and ongoing counseling.
15 Pierce was medically compliant with this regimen taking the prescribed medications and maintaining regular
16 medical checkups and contact. A person with significant bipolar disorder may experience periods of psychosis
17 during which the person separates from reality and may have false beliefs, delusions, and hallucinations. As I
18 have noted, the medicines which Pierce has consistently taken are very effective for controlling these problems
19 and Pierce has also engaged in a consistent and ongoing medical monitoring and counseling. Bipolar disorder
20 and the people who suffer from bipolar disorder are frequently misunderstood as are many people who have
21 mental health conditions or issues. Therefore, I have attached an article that I contributed to an on-line health
22 information forum, Healthline, regarding this disorder for your use as I believe it provides an appropriate outline
23 relating to the disorder.

24 Any person, given the right circumstances, can potentially have a psychotic break. This means that
25 person can become disassociated from what we term to be reality and may engage in behaviors that are not

1 normal or even violent. No person, and certainly no doctor, can ever say with 100% certainty that any individual
2 could not have a psychotic episode as these episodes can be brought on by trauma, underlying mental illness, or
3 other factors which might undermine the individual's mental health or stability. However, based upon my
4 history of treatment with Pierce, and a reasonable degree of medical certainty, I do not believe Pierce is a risk to
5 society and that the likelihood of any repeat of a psychotic episode prior to the action and behavior of Castle
6 College is negligible. Pierce's symptomology has been well managed for a number of years and there has been
7 no indication throughout the course of treatment that Pierce was medically noncompliant, unwilling to engage in
8 the proper medical regiment, or likely to become violent. Pierce was doing all of the things necessary to stay
9 healthy and maintain a productive life. This is more than we can say for many young college students who
10 engage in binge drinking and other classically destructive behaviors.

11 Bipolar disorder has many permutations and can be highly individualized. I believe that Dr. Harper
12 Sawyer, the College's expert in this case, is primarily an educator and lecturer. Dr. Sawyer has not treated Pierce
13 and does not have the experience necessary to adequately assess Pierce's condition, medical compliance over a
14 significant time period, or behavior patterns. I have personal knowledge of Dr. Sawyer as she/he is a professor
15 of some renown at Castle College. While I am respectful of Dr. Sawyer's academic knowledge, I do not believe
16 that this is an adequate or event appropriate substitute for actual treatment experience.

17 I would like to reiterate that I believe Pierce was taking adequate and appropriate medical action to
18 manage his/her medical condition and that such condition was manageable. I strongly feel that Pierce did not
19 present a danger to himself/herself or others and that the actions of the College were ill-considered.

20 DATED: August 22, 2014

Dr. Kennedy Kunningham

1 **STATEMENT OF PAXTON MASON**

2 My name is Paxton Mason. I am the 14th President of Castle College in River City, Nevada. I hold a
3 doctorate in Classical Studies from the University of Nevada. Before my elevation to the Presidency of Castle
4 13 years ago, I served as the Chair of the History Department for 5 years and as the Dean of Faculty for 7 years.
5 I have had the pleasure and honor to serve Castle College as a faculty member and as an officer for more than 30
6 years. Prior to joining the Castle faculty in 1981, I conducted post-doctoral research at Exeter University in
7 England and served as an Assistant Professor at Southern Colorado University.

8 The mission of Castle College is to provide enrichment and challenges to young men and women in all
9 aspects of their studies and their lives. At Castle, we pride ourselves on our service to the community and to the
10 nation. We have a stellar reputation as a whetstone of leadership. Our graduates have gone on to do remarkable
11 things: 3 former Cabinet members, 5 members of Congress, numerous prominent doctors, researchers, artists,
12 attorneys, and professionals; even a Pulitzer Prize winning author. The College leadership, including the Board
13 of Trustees, has all expressed grave concern for the reputation and standing of the institution as a result of this
14 incident. The college cannot afford to have its reputation sullied by association with a murderer. The College
15 and the community demanded a swift response. I do not regret nor will I apologize for the actions taken against
16 Pierce Ivory.

17 Based upon my recommendation, the Castle College Board of Trustees made the decision to expel Pierce
18 Ivory. They did so upon presentation of overwhelming evidence as to the character of Ms./Mr. Ivory and the
19 deception practiced by Ms./Mr. Ivory upon the college. I will outline the steps of my investigation fully.

20 On April 6, 2014, I received a disturbing phone call at home from one of Castle's best students, Morgan
21 Pettigrew. Morgan told me that Pierce ivory was a fraud, and that Ivory's real name was Chris Crawford, a
22 convicted murderer. Pettigrew followed up our phone conversation with an email that provided links to various
23 newspaper accounts of heinous crime committed in 2005. Suffice to say, I was shocked and outraged. During
24 the course of the following week, I instructed my executive assistant and our legal counsel to investigate further.
25 This research confirmed that Pierce Ivory was formerly known as Chris Crawford, who, as a child, murdered

1 her/his own mother, Christine Crawford, in Dinkla, California. I was stunned and confused. I could not
2 conceive of how this information was not brought to light during the admissions application process or in
3 subsequent investigation and interviews with Pierce ivory involving the Bidwell Scholarship.

4 The Bidwell Scholarship is Castle's shining glory. Named after famed graduate and benefactor Aloysius
5 Bidwell, it is awarded to one member of the entering class to support educational and community leadership
6 development. It is a full four year scholarship for tuition, fees, expenses, and a generous monthly stipend. It is
7 expected that the recipient of the scholarship will rise to some notoriety in his or her endeavors during their four
8 years at Castle and bring fame and glory to the College as an alumnus. The Admissions Office spends many
9 months screening potential candidates among thousands of applicants and recruits worthy students throughout
10 the nation. Competition for admission to Castle is highly selective. We have made a name for ourselves as one
11 of the preeminent liberal arts colleges in the nation. We always have a strong applicant pool and the field of
12 candidates for the Bidwell Scholarship is always quite strong. I have every confidence in our admissions and
13 selection process.

14 Once the Admissions Committee has selected a slate of finalists, each of these students undergoes a
15 series of interviews and meetings with college leaders, faculty, and officials. As President of Castle College, I,
16 of course, met with Pierce Ivory prior to her/his selection as a Bidwell Scholar. I do remember that Ms./Mr.
17 Ivory impressed me as a bright, articulate, and engaging young person. Clearly, his/her academic record and
18 credentials were unparalleled. While I cannot refute those grades and those academic test scores, all of the rest
19 was clearly an act; a lie; an attempt to grift this great college. Never could I have imagined the level of infamy
20 brought upon Castle by Pierce Ivory.

21 I believe the case is cut and dried. We specifically ask all prospective students about any past criminal
22 activity. There is a check box on the application form and a process by which applicants might explain a "yes"
23 answer. A review of Pierce Ivory's application indicates that s/he checked "no" on the form. This alone is
24 grounds for immediate expulsion. Professor Clark has said that she/he contacted me shortly after meeting with
25 Pierce Ivory in the Fall of 2011. I do not recall any conversations that I had with Emerson concerning Pierce

1 Ivory. Had there been any questions that would have raised issues of Pierce Ivory's (or any applicant's) prior
2 criminal activity or a hidden past, I would have insisted on a full and complete investigation. Certainly, the pool
3 of finalists for the Bidwell Scholarship that year, and any year, is strong. We could have easily awarded the
4 prize to a much more deserving student, such as Morgan Pettigrew.

5 Based on all the information received during the investigation, I met with the College Disciplinary
6 Committee, the College's counsel, and Pierce's advisor, Dr. Aidan Lipski. Then, of course, I met with Pierce
7 Ivory. She/he did not deny being formerly known as Chris Crawford and acknowledged killing her/his mother.
8 Based upon Pierce's own admissions, the College had proper grounds to end its relationship with this particular
9 student and that it is what the Committee recommended. The process I just described fully and appropriately
10 afforded due process to Pierce Ivory.

11 There was a great weight of information and evidence compiled at this point. I had the call from Morgan
12 Pettigrew; the Court Order which changed Pierce's name; newspaper reports about the circumstances of Mrs.
13 Crawford's murder; Pierce's own admission of complicity; and Pierce's application in which Pierce lied. I
14 retained the services of a Castle College graduate and noted private investigator, Sam "P-Nut" Zoolander, to
15 delve further into the criminal exploits of Pierce Ivory/Chris Crawford. P-Nut turned up many of the gory details
16 of the murder and was also able to access juvenile criminal records and psychological evaluations performed on
17 Ivory/Crawford. I am appreciative of P-Nut's methods as an investigator. She is always complete and accurate
18 and goes beyond what one would normally expect. I never question where or how Ms. Zoolander is able to
19 obtain her information. I demand accuracy and receive assurances and evidence of its veracity.

20 Up until this point, I had not considered Pierce Ivory/Chris Crawford a physical threat to the College,
21 merely a liar and a cheat. Having learned of his/her psychological profile, however, I became fearful for the
22 safety of the students, faculty, and staff of the College. I requested a psychological evaluation from an expert,
23 Harper Sawyer a Castle College graduate and a Professor of some renown in our Psychology department. I also
24 instructed our investigator to delve into Ivory/Crawford's actions while at Castle College. The results of these
25 two evaluations were shocking. Ivory/Crawford is clearly a troubled young man/woman who is psychologically

1 unbalanced and who could come unhinged at any moment. Upon advice of Ms. Zoolander, I spoke with three
2 students: Morgan Pettigrew, Kim Rodgers Smith, and Mac Dermott. Pettigrew and Smith are members of the
3 on-campus co-educational living group, Sigma Lambda Upsilon. Dermott lives across the hall from Pierce Ivory
4 in the Moore House dormitory. All three students have witnessed outbursts and/or erratic behavior by Pierce
5 Ivory that would lead them to be fearful for their own safety and the safety of others. Dermott reported to me
6 that, on at least four different occasions, he heard loud noises coming from Ivory's dorm room. He reported that
7 it sounded like Ivory may have been smashing things in her/his room or throwing him/herself up against the
8 walls. This is the type of erratic behavior that we simply do not need in our dormitories or on campus.

9 Pettigrew and Smith report that, on two separate occasions, Ivory attended parties at the Sigma Lambda
10 Upsilon house and both times seemed to have some sort of breakdown. Pettigrew reported seeing Ivory sitting
11 alone in a corner, rocking back and forth, mumbling something to him/herself. Smith told me at a different
12 party, Ivory appeared inebriated and was jumping up and down bumping into people and furniture with what
13 Smith characterized as a "deranged look" on her/his face.

14 As leaders in higher education and as moral compasses for youth, we at the College must look out for the
15 best interests of the majority of our students. Since this incident came to light, I have fielded literally dozens of
16 phone calls from parents who are justifiably concerned about the well-being of their sons and daughters. They
17 entrust their precious children to our care. We must take all prudent steps to ensure their welfare and
18 development.

19 Based on this overwhelming body of evidence, the College Disciplinary Committee recommended
20 immediate expulsion. I took the Committee's recommendation to the Board of Trustees. As a group, we felt
21 that, all things considered, Pierce Ivory presented a clear and present danger to the students and faculty, which
22 justified immediate expulsion. The Castle College Code of Conduct contained in the College student handbook
23 allows students to be expelled for dishonesty in their dealing with College faculty and staff. The disciplinary
24 committee and I discussed these rules and their application to this case. While one of the main reasons the Board
25 chose to expel Pierce was the dishonesty and fraud on the application, we were also worried about our student

1 body safety concerns. Our Board of Trustees was also concerned about negative publicity.

2 Our alumni and benefactors have been quite generous in the past. Castle College is blessed with a
3 healthy endowment. From an institutional standpoint, we must protect the financial security of our college. The
4 negative publicity generated by not only having a killer on campus, but having that person hold such a
5 prestigious scholarship and an office in student government has the potential to do irreparable harm to the Castle
6 College.

7 To be forthright, Morgan Pettigrew's mother, Penelope Pettigrew, serves on the College Board of
8 Trustees. Although Mrs. Pettigrew voted for expulsion, the vote was unanimous so her participation did not
9 influence the outcome. Mrs. Pettigrew has donated substantial time and money to the College and is an
10 outstanding alumnus. I am sure that her being a parent of a current student does not create any conflict of
11 interest. Mrs. Pettigrew's vote as every other Trustee's vote was for the good of the community.

12 We are a small community at Castle College. The faculty, staff, and young men and women who
13 populate this campus are a family. As a family, we must come together to protect ourselves and our good name.
14 Castle College students are men and women of intelligence, character, and compassion. Pierce Ivory has
15 violated our trust and damaged our good name and our good works. The College dealt with the situation quickly
16 and effectively, without reservation and without remorse. For Pierce ivory to imply that the actions of Castle
17 College have somehow ruined his/her reputation – the reputation of a confessed killer – is absurd. The College
18 is the injured party. With this frivolous lawsuit, Castle College continues to be needlessly attacked.

19 DATED: September 25, 2014.

Paxton Mason

1 STATEMENT OF MORGAN PETTIGREW

2 My name is Morgan Pettigrew. I have lived in Nevada my entire life. I am currently a Junior at Castle
3 College in River City, Nevada. At the time of the incidents in this case, I was a Sophomore. At castle, I am
4 involved in numerous extra-curricular activities. I am a member of the Student Senate and serve as student
5 representative to the Honor Court. I am the Membership Coordinator for a prestigious coeducational living
6 group, Sigma Lambda Upsilon. I am the facilitator for a political discussion group on campus, The Madison
7 Society, and I fence and play squash for the club programs at the College. I believe it is important to immerse
8 myself into the community to truly experience all that there is to offer.

9 I am what is known as a "Legacy" at Castle. Both of my parents attended the college and so did three of
10 my grandparents. The Pettigrew Library on campus was endowed by my grandmother, Lucretia Pettigrew.
11 Because of this tremendous family history with the school, I have a deep and abiding love for Castle and become
12 defensive whenever anyone speaks ill of the place. I am quite protective of the reputation that Castle College
13 holds, which is why I felt honor bound to inform President Mason of my concerns about Pierce Ivory.

14 I first met Pierce Ivory, or Chris, whatever you want to call him/her, during the interview process for the
15 Bidwell Scholarship. As you know, the Bidwell is the top academic scholarship that Castle offers to students.
16 One student from each entering class is selected and receives a full ride and many extra privileges. My family
17 certainly did not need the money that the scholarship had to offer, but the prestige is enormous. I admit that I
18 really wanted to be the Bidwell Scholar for my class. Instead it went to Pierce. There is no doubt that, on paper,
19 Pierce seemed more than qualified with perfect grades, scores, written essay, and interview. I guess that is when
20 the bells first started going off in my head. Everything seemed just a little too perfect. I just knew that there had
21 to be something not so perfect to balance it all out. Of course, I could never have imagined something so
22 monumental!

23 When I first met Pierce, she/he presented her/himself as a very affable, personable, and engaging
24 scholar. Upon meeting Pierce, I tried to ascertain his/her pedigree. I knew Pierce attended a very well regarded
25 prep school, but I could not place the family name. To engage Pierce in conversation, I asked if she/he were

1 descended from the Ivory family of Guymon. Pierce replied with a terse, “No” and then quickly changed the
2 subject. We all know who received Bidwell. I had no hard feelings, just a niggling of doubt.

3 I do not know Pierce Ivory very well. Nonetheless, we were in the same academic class and we were in
4 many of the same lectures and seminars together. Early on, my doubts about Pierce from our first meeting were
5 rekindled. We had a history class together during our first semester on campus. One early assignment was to
6 write and describe our genealogy. This was an easy assignment for me, though not a short one. However, Pierce
7 approached the professor to request an alternate assignment. Pierce insisted that she/he could not and would not
8 complete the given assignment, citing “personal reasons.” The entire class heard this exchange, which was not
9 done in private and was definitely not carried out in “private voices.” The professor agreed to an alternate
10 assignment, knowing that Pierce was the Bidwell Scholar. Apparently, these are the type of breaks a student
11 receives when they carry the Bidwell title.

12 In other classes that we shared, Pierce was very participatory, definitely to the point of arrogance. Pierce
13 was always right and anyone who questioned the veracity of her/his claims was scoffed at and challenged until
14 the opponent ultimately relented. I cannot say that we share political beliefs or even a common world view, but
15 Pierce and I never came to blows in any of our classes together.

16 During the Spring semester of our sophomore year, Pierce and I were both enrolled in an adolescent
17 psychology class taught by Professor Jeana Goosmann. Professor Goosmann is a noted child psychologist so I
18 was excited to take her class. In this class, Pierce was once again very bright but she/he had a great deal of
19 difficulty with interpersonal relationships. This was more pronounced than in other classes that we had together,
20 perhaps because this was a psychology class and we were all interested in testing the theories that Professor
21 Goosmann introduced. Pierce was very pushy, and aggressive in class and at times, seemed to take things much
22 too personally.

23 While we were both taking this class, I learned of Pierce’s intent to run for the Student Senate seat that I
24 had set my eye on. Given my campus involvement and my family’s contribution to Castle, I was not overly
25 concerned about the election’s outcome. However, Pierce took the election very seriously and conducted a

1 highly negative campaign against me. Pierce won the election by a very small margin. I was surprised, but not
2 made at Pierce. Obviously, the students who voted for Pierce did not know her/him very well and most likely
3 voted not for Pierce Ivory but for the Bidwell Scholar.

4 During Professor Goosmann's psychology class, I discovered Pierce's secret past. The mid-term
5 assignment was to write and present a paper to the class on a topic of our choosing in the area of adolescent
6 psychology. I have always been intrigued by psychopaths and sociopaths and wanted to do some additional
7 research on child killers. During my research, I came upon numerous mentions of a high profile case in
8 California involving the murder of a mother by her son/daughter. I chose to focus on this incident as a case
9 study for the class presentation. I found newspaper and magazine articles reporting on Pierce's (aka Chris
10 Crawford's) act of murder. When I began researching the paper, I did not know that the news articles were about
11 Pierce in light of the name change. However, it did not take me long to figure it out, as I was required to interact
12 with Pierce quite often in class. Through these forced interactions, I came to know pierce very well. Pierce had
13 a threatening demeanor and frequently acted erratically. The real key to the discovery was the presentation of
14 my paper concerning child killers in Professor Goosmann's class. Pierce became very upset. She/He almost
15 started hyperventilating and ran out of call before I had presented all of my conclusions. Once that happened, I
16 began to put two and two together. I realized that I needed to do a bit more research, confirm my suspicions, and
17 then go to President Mason with my concerns.

18 I knew that I needed to dig deeper and acquire some secure information about Pierce Ivory. Fortunately,
19 I have an uncanny ability to access on-line data with relative ease. I was able to "locate" the academic record of
20 Pierce Ivory in the Castle College database. That gave me a few more avenues to research: detailed high school
21 information, the original college application, and most helpful of all, Pierce's Social Security Number. Once I
22 obtained Pierce's Social Security Number, I was able to trace the court documentation of her/his name change
23 and from there the juvenile records, court-ordered psychological evaluations, and the entire sordid affair of the
24 murder of Christina J. Crawford by her son/daughter Chris, age 12! Now the Jekyll and Hyde persona of Pierce
25 Ivory made sense! I now feared for myself and for everyone at Castle. If someone could snap once to that

1 extent, she/he could snap again at any time and take out the entire campus.

2 I took two necessary immediate actions. First, I called President Mason at home and related to him/her
3 the fruits of my research. Secondly, I updated my Facebook page with the details of my investigation. Everyone
4 in the community has a right to know that there was a killer in our midst. I don't know what the big deal is –
5 everything I posted was true.

6 I fully cooperated with President Mason's investigation. I handed over all of the documentation that I
7 had uncovered and I spoke with the President's investigator, P-Nut Zoolander. She/He asked for my assistance
8 in locating any students who might have observed erratic behavior on the part of Pierce Ivory. I was happy to
9 assist.

10 During our first semester at Castle, Pierce and I roomed on the same hallway in the Moore House
11 dormitory. As the Bidwell Scholar, Pierce had a large single suite all to her/himself. Conversely, I was in a
12 triple across the hall. Loud, bizarre music at all hours came out of that room. Pierce would blast something
13 traditional like the Rolling Stones and then follow it up with some sort of hip-hop banjo music. The worst,
14 however, was that horrible screeching of the punk band, The Misfits. I am not sure that The Misfits even qualify
15 as musicians! In addition to Pierce's strange musical selections, there were frequently loud bumps and crashes
16 coming from Pierce's room, which resembled the sounds of furniture being thrown or stuff being broken. I
17 never witnessed any remnants of destruction, but it had to be bad. Thus, I put P-Nut in touch with one of my old
18 roommates, Mac Dermott, to verify the stories.

19 I also recounted to P-Nut my experiences with Pierce Ivory at two Sigma Lambda Upsilon house parties.
20 During the first party, I saw Pierce over in a corner of a room right next to one of the big speakers, just rocking
21 back and forth and occasionally mumbling or yelling out what appeared to be random words. I still remember
22 that, right after a jam by The Kevin Bacon Experience had finished, Pierce just yelled, "Flowers! Of the floral
23 variety!" At the time, I just shook my head and thought that maybe with all of those brains, some had begun to
24 leak out. At another party, Pierce clearly had too much to drink and was just jumping around bumping into
25 people and furniture and waving her/his hands all around. These were definitely not the actions of a sane person!

1 A Sigma Lambda Upsilon friend of mine, Kim Rodgers Smith, witnessed the same behavior, so I told P-nut to
2 get in touch with Kim to verify the story.

3 Some people believe that I have a vendetta against Pierce Ivory for beating me out of the Bidwell
4 Scholarship, winning the Senate race, and for accusing me of cheating on a test. None of these rumors are true.
5 I have the best interests of Castle College in my heart and feel honor bound to tell everyone what I know. That is
6 why I have cooperated with all aspects of the investigation and why I have consented to appear in court on behalf
7 of Castle College. I only regret that this is not a criminal proceeding to lock Pierce Ivory aka Chris Crawford
8 away for good.

9 I mentioned an accusation of cheating. Pierce went to Professor Goosmann and claimed that I had
10 cheated on an exam by gaining access to the test questions on-line. Pierce's accusation was completely
11 unfounded. How would I know that the test materials were even on a computer and then have the wherewithal to
12 access it without notice? As I refuted Pierce's claim before Professor Goosmann, Pierce went crazy. Perhaps
13 Pierce was upset that Professor Goosmann visited my family at our coastal retreat over the Spring Break. I
14 thought it was very generous of Mother to invite the professor to join us.

15 President Mason is also a close family friend, but that does not mean anything to me. Mother has known
16 President Mason for many years, both socially and through Castle College. Mother has served on the Board of
17 Trustees for all of President Mason's tenure and was instrumental in getting Mason confirmed as President.
18 None of this changes the fact that Pierce Ivory is a fraud and deserved to be expelled for hiding his/her real
19 identity and for committing that heinous atrocity. On top of all of that, Pierce is a real threat to the safety of the
20 student body.

21 DATED: October 1, 2014

Morgan Pettigrew

1 **STATEMENT OF DR. HARPER SAWYER**

2 I am Dr. Harper Sawyer. I am Chair of the Psychology Department at Castle College in River City,
3 Nevada. I was asked by President Mason to review the case file and incidents surrounding Pierce Ivory and to
4 render my medical opinion.

5 I received my Medical Degree from Harvard University and did my residency at Johns Hopkins
6 University. I am Board Certified in adolescent and adult psychiatry and have been practicing medicine for 28
7 years. I currently maintain a limited private practice where I often provide expert testimony in various legal
8 matters. I have provided testimony in 100 cases over the last ten years. My fee is \$250 per hour and \$300 per
9 hour for courtroom testimony. I am currently chair of the Psychology Department at Castle College and I am a
10 tenured professor teaching several classes. I am a member of the American Medical Association, the American
11 Psychiatric Association, and the American Academy of Psychiatry and the Law.

12 I reviewed the reports of Dr. Kennedy Kunningham and the limited medical records which were
13 provided to me by Dr. Kunningham in relationship to Pierce Ivory. I have also reviewed the statements of
14 Plaintiff Pierce Ivory as well as witnesses Paxton Mason, Morgan Pettigrew, and Emerson Clark. Further, I have
15 had an occasion to meet with Mr./Ms. Ivory in numerous nonclinical settings. Prior to learning of Pierce Ivory's
16 past, Mr./Ms. Ivory was a former student of mine whom I also tutored privately. We worked a number of late
17 nights together since Pierce Ivory assisted me with research for my recent book, Child Behavior and Modern
18 Psycho-Analysis. I have not treated Pierce Ivory as his/her physician or evaluated Pierce Ivory in a clinical
19 setting.

20 Based upon my personal interactions with Pierce Ivory, I concur with Dr. Kennedy Kunningham's
21 diagnosis that Mr./Ms. Ivory suffers from bipolar disorder. I also believe she/he exhibits symptoms of
22 personality disorder with borderline and anti-social traits, as well as post-traumatic stress disorder. I have
23 attached hereto a copy of a recent article of mine posted to a psychiatric discussion forum on-line.

24 While I have not had the opportunity to evaluate Pierce Ivory in the clinical setting, nor was I a treating
25 physician for Mr./Ms. Ivory, in everyday and ongoing activities she/he revealed a number of the traits associated

1 with personality disorders. These traits were evident when Pierce Ivory was a student in my class. The traits
2 were, for the most part, narcissistic. Mr./Ms. Ivory consistently interrupted others, felt compelled to be the “head
3 of the class,” was highly critical of those who could not keep up with him/her academically, and appeared to
4 regard himself/herself in a self-important light. All of these aggrandizing characteristics can be representative of
5 a personality disorder. Pierce Ivory has also alluded in personal conversations while working with me to a
6 history of mood swings and noted that she/he did not “want to go there.” I note that Ms./Mr. Ivory is extremely
7 intelligent, eager to learn, and has an engaging and attractive personality when he/she is not criticizing others for
8 their shortcomings. Pierce Ivory makes friends easily and, in some instances, has been instrumental in tutoring
9 others to help them understand complex ideas. However, I believe that such tutoring was to inflate Pierce
10 Ivory’s own importance to his/her group of friends and colleagues and to show his/her superiority in
11 understanding the concepts presented in his/her major.

12 I learned anecdotally that Pierce Ivory’s father committed suicide and that he/she killed his/her mother.
13 It is well represented in the literature relating to psychiatric disorders in adolescents that traumatic events like
14 these can or could have contributed to Pierce Ivory’s disorders or any psychotic break he/she may have
15 experienced in the past. The trauma relating to the death of a parent, particularly by suicide or murder, can have
16 long-lasting psychological effects.

17 It is my understanding that Pierce Ivory has historically been compliant with the medications needed to
18 manage the bipolar and other disorders. However, according to Dr. Kunningham, Mr./Ms. Ivory has experienced
19 some psychotic features. Without medication and monitoring, Pierce Ivory is a threat to others and is capable of
20 significant violence, including self-mutilation and/or harm to others. In the highly competitive academic and
21 social environment of Castle College, combined with Pierce Ivory’s own excessive emphasis on scholastic
22 achievement, I believe it is likely that the stressors upon Mr./Ms. Ivory will significantly increase the difficulty
23 of managing his/her disorders and increase the risk of an episode or psychotic breaks. Medication and treatment
24 alone are not sufficient under these types of circumstances.

25 While it does appear to me that Pierce Ivory had been able to manage the disorder prior to this time

1 period, the circumstances here are entirely different where he/she must operate more independently without overt
2 guidance from a guardian and must be responsible for his/her own medical management. Such a situation
3 creates a significant and unavoidable risk.

4 Based upon these factors, it is my reasonable, medical opinion that Pierce Ivory presents a risk of harm
5 to the other students at Castle College.

6 DATED: October 15, 2014

Dr. Harper Sawyer

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CASTLE COLLEGE
River City, Nevada
Founded 1854

Eruditio et Veritas

March 15, 2012

Dear Pierce Ivory,

On behalf of Castle College, I am pleased to inform you that not only have you been admitted to the freshman class entering in the fall semester of 2012 but you have also been awarded the prestigious Bidwell Scholarship. This scholarship will pay your tuition, room, board, and expenses as well as a generous stipend. It will also entitle you to participate in many Castle College enrichment programs and community events.

Please call me if you have any questions about this award, which is simply the very best we have to offer. To accept our offer, please also sign the enclosed form confirming your acceptance and return it in the enclosed envelope no later than April 15, 2012. I look forward to hearing from you and seeing you again.

Sincerely,

E.M. Mason, Ph. D.

Paxton Mason, Ph.D. President,
Castle College

EXHIBIT 1

CASTLE COLLEGE
River City, Nevada
Founded 1854

Eruditio et Veritas

I, Pierce Ivory (insert name), hereby accept Castle College's offer of admission to the freshman class entering in the Fall semester 2012 and scholarship (if applicable). I understand that by accepting this offer, I am agreeing to abide by Castle College's Code of Conduct.

Signature: Pierce Ivory

Dated: March 30, 2012

EXHIBIT 2

CASTLE COLLEGE
River City, Nevada
Founded 1854

Eruditio et Veritas

April 21, 2014

Dear Pierce Ivory,

As recommended by the College Disciplinary Committee and based upon your criminal background which was not disclosed to the College during the admissions process in violation of the Castle College Code of Conduct, Castle College hereby informs you that

1. You are hereby expelled for cause.
2. As a result of the expulsion, the Bidwell Scholarship and any other scholarships or benefits previously awarded to you are hereby revoked.
3. All College facilities are hereby closed to you effective immediately and all your belongings should be removed from your dormitory room on or before April 26, 2014.

Sincerely,

E.M. Mason, Ph. D.

Paxton Mason, Ph.D. President,
Castle College

EXHIBIT 3

CASTLE COLLEGE

Application For Admission

Last Name: Ivory	First Name: Pierce	Middle Initial:
Preferred Name: Pierce Ivory		Former Last Name:
Date of Birth: 03/09/1993	Place of Birth: Dinkla, CA	
Social Security Number: 012-25-1950		
Current Mailing Address: 1234 Maple Street		
City: Tinkla	State: CA	Zip Code: 99998
Contact Telephone Number: (496) 555-1591		

Citizenship:

US Citizen Dual Citizenship US Permanent Resident Other: _____

Military:

Active Military: Yes No Branch: _____

Veteran: Yes No Branch: _____

Disciplinary History:

1. Have you ever been on academic probation? Yes No
2. Has action ever been taken against you from any educational facility which you have attended for misconduct of a behavioral nature? Yes No
3. Have you ever been convicted of a felony or other crime? Yes No

If you would like to provide additional information for your answers, enter it here:

SIGNATURE & PAYMENT

Application Fee Payment: Online Payment Mailed Payment Fee Waived

Required Signature:

I certify that all the information submitted with my admission application, including my essay and any supplemental information, is correct and my own work. I understand that I will be subject to a range of disciplinary actions by Castle College should any of the information I have provided is false. In addition, I understand that if I am accepted, I agree to abide by the rules, regulations, and code of conduct of Castle College.

Signature: Pierce Ivory

Date: 11/09/2011

EXHIBIT4

CASTLE COLLEGE

CODE OF CONDUCT

The following are defined as disciplinary offenses actionable by the College and which may lead to suspension, expulsion, and/or revocation of rights and privileges offered by the College:

1. **Scholastic Dishonesty:** submission of false records of academic achievement; cheating on assignments or examinations; plagiarizing; altering, forging, or misusing a College academic record; taking, acquiring, or using test materials without faculty permission; acting alone or in cooperation with another to falsify records or to obtain dishonestly grades, honors, awards, scholarships, or professional endorsement.
2. **Falsification:** willfully providing College offices or officials with false, misleading, or incomplete information; intentionally making a false report of a bomb, fire, natural disaster, or other emergency to a College official or an emergency service agency; misusing, altering, forging, falsifying, or transferring to another person College-issued identification; forging, or altering without proper authorization, official College records, or documents or conspiring with or inducing others to forge or alter without proper authorization College records or documents.
3. **Identification and Compliance:** willfully refusing to or falsely identifying one's self; willfully failing to comply with a proper order or summons when requested by an authorized College official.
- ...
8. **University facilities and Services:** acting to obtain fraudulently- by deceit, by unauthorized procedures, by bad checks, by misrepresentation – goods, quarters, services, or funds from College departments or student organizations or individuals acting in their behalf; misuse, alteration, or damage of fire-fighting equipment, safety devices, or other emergency equipment or interference in the performance of those specifically charged with carrying out emergency services; wrongful use of college properties or facilities.
- ...
12. **Attempt to Injure or Defraud:** to make, forge, print, reproduce, copy, or alter any record, document, writing, or identification used or maintained by the College when done with intent to injure, defraud, or misinform.
13. **Dangerous Conduct:** any conduct from which the College can reasonably conclude that the student presents a danger to the Castle College community.

EXHIBIT 5

EXHIBIT 6

Psychiatric Disorders

(An On-line Discussion & Description by noted Psychiatrist Dr. Harper Sawyer, Castle College, River City, Nevada)

Personality Disorders

Common Characteristics

Personality Disorders are mental illnesses that share several unique qualities. They contain symptoms that are enduring and play a major role in most, if not all, aspects of the person's life. While many disorders vacillate in terms of symptom presence and intensity, personality disorders typically remain relatively constant.

To be diagnosed with a disorder in this category, a psychologist will look for the following criteria:

1. Symptoms have been present for an extended period of time, are inflexible and pervasive, and are not a result of alcohol or drugs or another psychiatric disorder. The history of symptoms can be traced back to adolescence or at least early adulthood.
2. The symptoms have caused and continue to cause significant distress or negative consequences in different aspects of the person's life.
3. Symptoms are seen in at least two of the following areas:
 - o *Thoughts* (ways of looking at the world, thinking about self or others, and interacting)
 - o *Emotions* (appropriateness, intensity, and range of emotional functioning)
 - o *Interpersonal Functioning* (relationships and interpersonal skills)
 - o *Impulse Control*

Disorders in this Category

Antisocial Personality Disorder
Borderline Personality Disorder
Narcissistic Personality Disorder

Psychiatric Disorders

Antisocial Personality Disorder

Category

Personality Disorders

Etiology

This disorder was previously known as both psychopathic and Sociopathic personality disorder. Like most personality disorders, there are many factors that may contribute to the development of symptoms. Because the symptoms are long lasting, the idea that symptoms begin to emerge in childhood or at least adolescence is well accepted. The negative consequences of such symptoms, however, may not show themselves until adulthood.

Research has shown that a large percentage of individuals with this disorder have recognizable behaviors prior to age 15. These behaviors include difficulty with authority, legal altercations, cruelty to animals, fire setting, and a dislike or anger toward authority. This disorder is diagnosed much more frequently in males.

Symptoms

The symptoms of antisocial personality disorder include a longstanding pattern (after the age of 15) of disregard for the rights of others. There is a failure to conform to society's norms and expectations that often results in numerous arrests or legal involvement as well as a history of deceitfulness where the individual attempts to con people or use trickery for personal profit. Impulsiveness is often present, including angry outbursts, failure to consider consequences of behaviors, irritability, and/or physical assaults.

Some argue that a major component of this disorder is the reduced ability to feel empathy for other people. This inability to see the hurts, concerns, and other feelings of people often results in a disregard for these aspects of human interaction. Finally, irresponsible behavior often accompanies this disorder as well as a lack of remorse for wrongdoings.

Treatment

Treatment for this disorder is very rarely sought. There is a limited amount of insight into the symptoms, and the negative consequences are often blamed on society. In this sense, treatment options are limited. Some research has found long term insight oriented therapy to be effective, but getting the individual to commit to this treatment is a major obstacle.

Prognosis

Prognosis is not very good because of two contributing factors. First, because the disorder is characterized by a failure to conform to society's norms, people with this disorder are often incarcerated because of criminal behavior. Secondly, a lack of insight into the disorder is very common. People with antisocial personality disorder typically see the world as having the problems, not him or herself, and therefore rarely seek treatment. If progress is made, it is typically over an extended period of time.

Psychiatric Disorders

Borderline Personality Disorder

Category

Personality Disorders

Etiology

Like most personality disorders, there are many factors that may contribute to the development of symptoms. Because the symptoms are long lasting, the idea that symptoms begin to emerge in childhood or at least adolescence is well accepted. The negative consequences of such symptoms, however, may not show themselves until adulthood.

Symptoms are often present in adolescence and almost always by young adulthood. There may be

a history of unstable relationships in the person's life and there is a higher than average likelihood of sexual abuse, family violence, and/or neglect in the person's childhood. This disorder is diagnosed much more frequently in females.

Symptoms

The major symptoms of this disorder revolve around unstable relationships, poor or negative sense of self, inconsistent moods, and significant impulsivity. There is an intense fear of abandonment with this disorder that interferes with many aspects of the individual's life. This fear often acts as a self-fulfilling prophecy as they cling to others, are very needy, feel helpless, and become overly involved and immediately attached. When the fear of abandonment becomes overwhelming, they will often push others out of their life as if trying to avoid getting rejected. The cycle most often continues as the individual will then try everything to get people back in his or her life and once again becomes clingy, needy, and helpless.

The fact that people often do leave someone who exhibits this behavior only proves to support their distorted belief that they are insignificant, worthless, and unloved. At this point in the cycle, the individual may exhibit self-harming behaviors such as suicide attempts, mock suicidal attempts (where the goal is to get rescued and lure others back into the individual's life), cutting or other self-mutilating behavior. There is often intense and sudden anger involved, directed both at self and others, as well as a difficulty controlling destructive behaviors.

Treatment

Treatment for this disorder is long term in nature since the symptoms have been present for an extended time and interfere with many aspects of the person's life. Insight oriented therapy can be helpful but research is showing an increased support for a cognitive-behavioral approach. In other words, the individual's thoughts and actions are monitored both by the self and therapist and specific behaviors are counted and a plan is made to gradually reduce those thoughts and behaviors that are seen as negative. A combined approach may be best, but either way requires intensive time and effort.

Prognosis

Prognosis is difficult to assess. While the disorder is chronic in nature, gradual improvements with work are definitely seen. While it is difficult for anyone to change major aspects of their personality, the symptoms of this disorder can be reduced in both number and intensity. Long term treatment is almost always required.

Psychiatric Disorders

Narcissistic Personality Disorder

Category

Personality Disorders

Etiology

Like most personality disorders, there are many factors that may contribute to the development of symptoms. Because the symptoms are long lasting, the idea that symptoms begin to emerge in childhood or at least adolescence is well accepted. The negative consequences of such symptoms, however, may not show themselves until adulthood.

Symptoms

The symptoms of narcissistic personality disorder revolve around a pattern of grandiosity, need for admiration, and sense of entitlement. Often individuals feel overly important and will exaggerate achievements and will accept, and often demand, praise and admiration despite worthy achievements. They may be overwhelmed with fantasies involving unlimited success, power, love, or beauty and feel that they can only be understood by others who are, like them, superior in some aspect of life.

There is a sense of entitlement, of being more deserving than others based solely on their superiority. These symptoms, however, are a result of an underlying sense of inferiority and are often seen as overcompensation. Because of this, they are often envious and even angry of others who have more, receive more respect or attention, or otherwise steal away the spotlight.

Treatment

Treatment for this disorder is very rarely sought. There is a limited amount of insight into the symptoms, and the negative consequences are often blamed on society. In this sense, treatment options are limited. Some research has found long term insight oriented therapy to be effective, but getting the individual to commit to this treatment is a major obstacle.

Prognosis

Prognosis is limited and based mainly on the individual's ability to recognize their underlying inferiority and decreased sense of self worth. With insight and long term therapy, the symptoms can be reduced in both number and intensity.

EXHIBIT 7



Bipolar Disorder

Definition

Bipolar disorder is characterized by periods of excitability (mania) alternating with periods of depression. The "mood swings" between mania and depression can be very abrupt.

Alternative Names

Manic depression; Bipolar affective disorder

Causes, incidence, and risk factors

Bipolar disorder affects men and women equally and usually appears between the ages of 15 and 25. The exact cause is unknown, but it occurs more often in relatives of people with bipolar disorder.

Bipolar disorder results from disturbances in the areas of the brain that regulate mood. During manic periods, a person with bipolar disorder may be overly impulsive and energetic, with an exaggerated sense of self. The depressed phase brings overwhelming feelings of anxiety, low self-worth, and suicidal thoughts.

There are two primary types of bipolar disorder. People with bipolar disorder I have had at least one fully manic episode with periods of major depression. In the past, bipolar disorder I was called manic depression.

People with bipolar disorder II seldom experience full-fledged mania. Instead they experience periods of hypomania (elevated levels of energy and impulsiveness that are not as extreme as the symptoms of mania). These hypomanic periods alternate with episodes of major depression.

A mild form of bipolar disorder called cyclothymia involves periods of hypomania and mild depression, with less-severe mood swings. People with bipolar disorder II or cyclothymia may be misdiagnosed as having depression alone.

Symptoms

The manic phase may last from days to months and include the following symptoms:

- Elevated mood
 - Racing thoughts
 - Hyperactivity
 - Increased energy
 - Lack of self-control
- Inflated self-esteem (delusions of grandeur, false beliefs in special abilities)
- Over-involvement in activities
- Reckless behavior
 - Spending sprees
 - Binge eating, drinking, and/or drug use
 - Sexual promiscuity
 - Impaired judgment
- Tendency to be easily distracted
- Little need for sleep
- Easily agitated or irritated
- Poor temper control

These symptoms of mania are seen with bipolar disorder I. In people with bipolar disorder II, hypomanic episodes involve similar symptoms that are less intense.

The depressed phase of both types of bipolar disorder involves very serious symptoms of major depression:

- Persistent sadness
- Fatigue or listlessness
- Sleep disturbances
 - Excessive sleepiness
 - Inability to sleep
- Eating disturbances
 - Loss of appetite or weight gain

- Loss of self-esteem
- Feelings of worthlessness, hopelessness and/or guilt
- Difficulty concentrating, remembering, or making decisions
- Withdrawal from friends
- Withdrawal from activities that were once enjoyed
- Persistent thoughts of death

There is a high risk of suicide with bipolar disorder. While in either phase, patients may abuse alcohol or other substances, which can worsen the symptoms.

Sometimes there is an overlap between the two phases. Manic and depressive symptoms may occur simultaneously or in quick succession in what is called a mixed state.

Signs and tests

A diagnosis of bipolar disorder involves consideration of many factors. The health care provider may do some or all of the following:

- Observe your behavior and mood
- Obtain your medical history, including any medical problems you have and any medications you take
- Ask about your recent mood swings and how long you've experienced them
- Ask about your family medical history, particularly whether anyone has or had bipolar disorder
- Perform a thorough examination to identify or rule out physical causes for the symptoms
- Request laboratory tests to check for thyroid problems or drug levels
- Speak with your family members to discuss their observations about your behavior

Note: Use of recreational drugs may be responsible for some symptoms, though this does not rule out bipolar affective disorder. Drug abuse may itself be a symptom of bipolar disorder.

Treatment

Bipolar disorder is often treated with mood-stabilizing medications such as valproic acid, lithium, and carbamazepine. These are effective for treating both the manic and depressive phases, as well as preventing future symptoms.

Antidepressant drugs may be useful during the depressive phase IF the antidepressants are used with a mood stabilizer. Mood stabilizers are very important in people with bipolar disorder. Without a mood stabilizer, antidepressants may trigger mania in people with bipolar disorder. (Keep in mind that people with bipolar disorder II may be misdiagnosed with depression only because they do not experience full-fledged mania. If these patients take antidepressants without mood stabilizers, it can trigger a manic episode.)

Anti-psychotic drugs can help a person who has lost touch with reality. Anti-anxiety drugs, such as benzodiazepines, may also help. The patient may need to stay in a hospital until his or her mood has stabilized and symptoms are under control.

Electroconvulsive therapy (ECT) may be used to treat bipolar disorder. ECT is a psychiatric treatment that uses an electrical current to cause a brief seizure of the central nervous system while the patient is under anesthesia. Studies have repeatedly found that ECT is the most effective treatment for depression that is not relieved with medications.

Getting enough sleep helps keep a stable mood in some patients. Psychotherapy may be a useful option during the depressive phase. Joining a support group may be particularly helpful for bipolar disorder patients and their loved ones.

Expectations (prognosis)

Mood-stabilizing medication can help control the symptoms of bipolar disorder. However, patients often need help and support to take medicine properly and to ensure that any episodes of mania and depression are treated as early as possible.

Some people stop taking the medication as soon as they feel better or because they want to experience the productivity and creativity associated with mania. Although these early manic states may feel good, discontinuing medication may have very negative consequences.

Suicide is a very real risk during both mania and depression. Suicidal thoughts, ideas, and gestures in people with bipolar affective disorder require immediate emergency attention.

Complications

Stopping or improperly taking medication can lead to symptoms coming back and the following complications:

- Alcohol and/or drug abuse may be used as a strategy to "self-medicate."
- Personal relationships, work, and finances may suffer as a result of mood swings.
- Suicidal thoughts and behaviors are a very real complication of bipolar disorder.

This illness is challenging to treat. Patients and their friends and family must be aware of the risks of neglecting to treat bipolar disorder.






Calling your health care provider

Call your health provider or an emergency number right way if:

- You are having thoughts of death or suicide
- You are experiencing severe symptoms of depression or mania
- You have been diagnosed with bipolar disorder and your symptoms have returned or you are having any new symptoms

Information compiled by Kennedy Kunningham, M.D., Wilmington, California

EXHIBIT 8
MORGAN PETTIGREW'S FACEBOOK POST

	<p>Morgan Pettigrew Tuesday April 8th, 2014 near River City, Nevada</p>
<p>There is a KILLER in our midst! "Pierce Ivory" is really Chris Crawford – the infamous California child who killed his/her mother in 2005. She/He should be expelled – having someone like that on campus is just not safe for the rest of us! What if he/she snaps?!?! We have got to do something!</p> <p>Like · Comment · Unfollow Post</p>	
	<p>Jackie Potomski I cannot believe it – I am certainly not going anywhere near Pierce now! Tuesday April 8, 2014</p>
	<p>Mac Dermott I always knew there was something wrong there. I just cannot believe we are going to school with a killer! Tuesday April 8, 2014</p>
	<p>Robin Chambers That makes my skin crawl! How can someone so unhinged get into our school? Tuesday April 8, 2014</p>
	<p>Kim Rodgers Smith What?!? And he/she has been hiding it all this time? We have a right to know that a killer is going to class with us! Tuesday April 8, 2014</p>