

STATE OF NEVADA  
OFFICE OF THE ATTORNEY GENERAL  
RENO, NEVADA

TRANSCRIPT OF ELECTRONICALLY-RECORDED INTERVIEW  
LISA RUGGERIO  
AUGUST 5, 2014  
RENO, NEVADA

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1 RENO, NEVADA, TUESDAY, AUGUST 5, 2014, 3:05 P.M.

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3  
4 MS. DAVIES: Okay. The time is approximately  
5 1:06 p.m. It is August 5th, 2014. This interview is being  
6 conducted at the law offices of Kent Robison at 71 Washington  
7 Street in Reno, Nevada.

8 Present in the interview is myself, Jennifer  
9 Davies, Deputy Chief Investigator.

10 And you are the clerk; correct, of the Washoe  
11 County School District board of trustees?

12 MS. RUGGERIO: That's correct.

13 MS. DAVIES: So, Lisa Ruggiero. And the spelling  
14 is R-U-G-G-E-R-I-O.

15 Also present is Kent Robison and Michael Malloy.

16 First of all, Lisa, you are aware that I am tape  
17 recording this; correct?

18 MS. RUGGERIO: Yes.

19 MS. DAVIES: And I have your permission to do so?

20 MS. RUGGERIO: You do.

21 MS. DAVIES: Okay. Also, I'll just make it known  
22 that counsel is also tape recording for their purposes.

23 So, what I want to discuss first is the events  
24 that took place, kind of led up to and took place during the  
25 day on July 22nd, if you can kind of go through those and let

1 me know. And then we'll kind of try and break it down a  
2 little bit.

3 MS. RUGGERIO: Okay. So, just tell you --

4 BY MS. DAVIES:

5 Q. Yeah, if you want to just go through your story  
6 and tell me, that would be great.

7 MR. MALLOY: Story?

8 MS. DAVIES: Well, okay. Your side.

9 MR. ROBISON: Please keep your voice up because  
10 we want to make sure that we pick you up.

11 MS. RUGGERIO: Okay. So on -- let's see. On  
12 July 22nd, I arrived at the school district to attend a  
13 meeting. The meeting started earlier in the day, but I did  
14 not attend the first part of the meeting. And so, let's see,  
15 the meeting started. It was a board docs training, which is  
16 an online program that we use for our agenda and our minutes.  
17 And so it was to train the trustees on how to use it because  
18 we use it during the meetings --

19 BY MS. DAVIES:

20 Q. Okay.

21 A. -- to review -- look at the agenda items and the  
22 corresponding documents. And so the person came in, actually,  
23 and trained the trustees and staff on how to use the board  
24 docs program.

25 Q. Okay.

1           A.    And after that, we had a -- we went through that  
2 training, and then after that, I think there was a short  
3 break.  And then we went into what was supposed to be a -- I  
4 think we were talking about our board governance.  I think it  
5 was called -- you call it a policy meeting.

6                   And so we were to talk about our board  
7 governance, and when the meeting was about to begin, we were  
8 seated.  And President Clark gavelled and said that we would  
9 be going into a legal meeting.  And then after that, we went  
10 into a meeting with the Board members and counsel and  
11 Superintendent Martinez.

12                   And President Clark presented that there had been  
13 a complaint about Superintendent Martinez regarding his having  
14 a licensed CPA.

15                   MR. MALLOY:  Excuse me.  Are you going to conduct  
16 this -- just let her talk like that or are you going to ask  
17 questions?

18                   MS. DAVIES:  No, I'm going to let her tell the  
19 story and we'll kind of go back.

20                   MR. MALLOY:  All right.  Fair enough.  It's your  
21 interview.

22                   MS. DAVIES:  No, that's okay.

23                   Go ahead.

24                   MS. RUGGERIO:  And so that was presented, and  
25 comments were -- comments were made by some of the trustees.

1 Superintendent Martinez made some comments and got up and left  
2 the room and came back with a piece of paper, presented that  
3 to the trustees. Then he left again.

4 After that, the trustees were concerned and felt  
5 that based off of Superintendent Martinez's response, because  
6 it was a little -- I don't know the right word to use.  
7 Troublesome, maybe. That we needed to talk about -- when we  
8 talked about putting this forward in a public meeting, he  
9 became inappropriate.

10 BY MS. DAVIES:

11 Q. Okay.

12 A. His behavior was inappropriate.

13 And then he left the room, and then President  
14 Clark was going to go and talk to him. And Dr. McLaury said,  
15 "No, you're not going to go by yourself," and so then the  
16 three officers agreed that we would go and sit down with him  
17 along with our chief legal counsel, Mr. Drake.

18 Q. Okay. And just to clarify, you were one of the  
19 three officers of the board of trustees; correct?

20 A. That's correct. President Barbara Clark; Vice  
21 President Barbara McLaury, Dr. Barbara McLaury; and then I am  
22 the clerk.

23 Q. Okay. So then -- so the three of you including  
24 legal counsel went to talk to Pedro Martinez?

25 A. Yes.

1 Q. Okay. And what happened?

2 A. So we went into Superintendent Martinez's office  
3 and sat down, and President Clark spoke and talked to Pedro  
4 that we would have to go forward in a public meeting with this  
5 information. And he started acting up again, acting  
6 inappropriate.

7 And at that time, he kind of started saying, "Pay  
8 me, just pay me", you know, "pay me my contract," which was a  
9 little odd, honestly. So -- and, you know, President Clark  
10 said that's not appropriate.

11 At that time, he continued to -- to demand that  
12 he be paid this money. And, you know, I said, "Pedro, that's  
13 not appropriate," and then he started to threaten us that he  
14 was going to -- that he was going to try to humiliate us in  
15 the press and that he was going to go to the governor and  
16 Arnie Duncan.

17 And at that time, we just -- I said to -- I think  
18 we just kept saying, "That's just not appropriate." And at  
19 that point, I think we just got up and left and went into the  
20 board room.

21 Q. Okay. So when you guys got up to leave and you  
22 went into the board room, is that when the discussion back and  
23 forth regarding a possible severance package started?

24 A. So --

25 Q. -- when that take place?

1           A.    So it just became very --

2           MR. ROBISON:  Hold on.  Let me just -- you have  
3 to wait until she completes her question before you start  
4 answering, okay?

5           MS. RUGGERIO:  Sorry.

6           MS. DAVIES:  That's okay.

7           MS. RUGGERIO:  It's an Italian --

8           MR. MALLOY:  Everybody does it, okay?

9           MS. DAVIES:  It's a hard habit to break, and I  
10 still do it.  So don't worry about it.  Yeah.

11           So, how did that happen?  How did that get  
12 started?

13           MS. RUGGERIO:  Okay.  So ask me the question  
14 again.

15 BY MS. DAVIES:

16           Q.    In reference to the discussion between the Board,  
17 the trustees and the officers and Pedro Martinez --

18           MR. ROBISON:  You mean the Board officers?

19           MS. DAVIES:  Yes.

20           MR. ROBISON:  Thank you.

21 BY MS. DAVIES:

22           Q.    How did that discussion about the possible  
23 severance package get started?

24           A.    In Pedro's office?

25           Q.    Well, from what I understood, he mentioned, "Just

1 pay me my contract," you know, "just pay me," and the response  
2 from you was, "That's inappropriate." And then you guys left.

3 A. Yes.

4 Q. And went back to the board room; is that right?

5 A. Yes.

6 Q. So, when you guys went back to the board room,  
7 was there more discussion about a severance package?

8 A. So, basically, I mean, there was -- basically  
9 I -- it may have been President Clark who said, "He's, you  
10 know, demanding money to resign," and I think at that time,  
11 Randy Drake said, "Let me go and talk to him."

12 Q. Okay.

13 A. So, that's what happened. I mean, it wasn't like  
14 any -- it was chaotic because we weren't -- we weren't  
15 prepared for him to behave the way he was behaving. So I  
16 think we were all in a little -- just very upset.

17 Q. Okay. So what discussion, if any, took place,  
18 then, after Randy left? Did Randy come back with any  
19 information from Pedro for the officers or was there any  
20 discussion back and forth about possibly paying him a  
21 severance package?

22 A. So, at that time, it was just very, very  
23 scattered. So there were several conversations going on at  
24 that time. And I think Randy was back and forth several times  
25 and talked with some of the trustees about what was happening

1 with his conversations with Superintendent Martinez, but  
2 nothing like, you know, we sat down and had a conversation or  
3 anything like that.

4 It was just sheer, utter chaos. I was tending a  
5 little bit to Trustee Rosenberg just because he was wanting to  
6 go and interact with Superintendent Martinez. I said that's,  
7 you know, let's just sit down, be calm and try to see what's  
8 going to happen here. So...

9 Q. Okay. After -- after that, what happened?

10 A. I think at that time, Superintendent Martinez  
11 left and then the trustees went into Superintendent Martinez's  
12 office. And at that point, I think President Clark called in  
13 Communications staff, and they worked on a press release.  
14 Still very, very chaotic.

15 And then I think after that, she may have called  
16 in the leadership team, which are the two -- our two -- our  
17 chief of staff and our deputy superintendent. She called them  
18 in, and then after that, I think Communications called a  
19 meeting of the leadership staff and most of the trustees went  
20 and met with leadership staff.

21 And then after that, I trailed in a little bit  
22 later with Trustee Aiazzi and Randy Drake, and then we all  
23 returned back to Superintendent Martinez's office, and then we  
24 saw that he came back. He was back in his office.

25 Q. Okay. And if you need to take a break -- I mean,

1 it -- it's obvious that this is visibly upsetting you. So I  
2 don't want to make this really difficult. So, if you want to  
3 take a break at any time -- I mean, it's just an interview.

4 A. Okay.

5 Q. So it's not a big deal at all. Okay?

6 A. Yes. Sorry.

7 Q. No, no, no. Don't worry about it. I'm just  
8 trying to gather all the facts from everybody and put it all  
9 together. So there's no pressure. Okay?

10 A. It was a bad day. So -- that's all.

11 Q. It sounds like there was a lot of emotion, so --  
12 So initially when you came out of the governance  
13 meeting at the very beginning of the day -- I think you were  
14 talking about the governance or policies or --

15 A. We were scheduled to go into --

16 Q. Oh, that's right. You were scheduled to go, and  
17 that's when President Clark gavelled and said, "We're having a  
18 legal meeting" and requested all other staff to exit. This  
19 was in the board room; correct?

20 A. That's correct.

21 Q. Okay. And at that time, President Clark  
22 presented the complaint regarding the CPA issue; correct?

23 A. Correct.

24 Q. Okay. So then during that time, President -- or  
25 Superintendent Martinez was present?

1           A.    That's correct.

2           Q.    Okay.  Discussing the CPA issue, his side of the  
3 story to tell you guys, what did he say?

4           A.    He just was very confused.  He didn't really say  
5 anything.  It -- my perspective as a trustee listening to him,  
6 it was very -- his response was odd because he seemed so  
7 confused, and kind of one minute, he was saying one thing and  
8 the next minute, he may have kind of said like the opposite.  
9 So it was worrisome.

10          Q.    Do you remember specifically what he said that  
11 was -- that was so different?

12          A.    I mean, I can't tell you exactly -- remember  
13 exactly what he said.  I can just tell you the feeling --

14          Q.    Okay.

15          A.    -- that I had as a trustee because, you know,  
16 we're responsible.  And so, when you just -- it just was not  
17 the type of response that you would have expected for the  
18 situation.  And it was -- he was very defensive and agitated,  
19 so...

20          Q.    Okay.  So, if I understand it, so then the  
21 discussion about the CPA issues takes place.

22                   And at what point does somebody ask -- does  
23 somebody ask Superintendent Martinez to leave?

24          A.    Superintendent Martinez got up and left twice in  
25 that meeting.

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Q. Okay.

A. So he just got up and left and came back the first time with a piece of paper, and I want to say it was a copy of a certificate. But I have really low vision, so I did not really study it. But he presented it. It's a copy of a -- his CPA certificate or something like that.

Q. Okay.

A. So -- and then he talked some more -- again, was kind of really inappropriate and then left again.

Q. Okay. Was he ever asked to leave or did he just leave on his own that second time?

A. He just left on his own.

Q. Okay. So he left, and then, if I understood you correctly, then it was you and Vice President McLaury and President Clark along with Randy Drake who went to his office to speak with him in person?

A. Yes.

Q. What conversations took place there?

MR. MALLOY: Did you -- was that answer a "yes"?

MS. RUGGERIO: Yes.

MR. MALLOY: Go ahead.

MS. RUGGERIO: Sorry.

MS. DAVIES: That's okay.

BY MS. DAVIES:

Q. What conversation took place in his office?

1           A.    So, like I said, President Clark had gone to the  
2 back. "This is serious" and that "the trustees are going to  
3 have to take this to a board meeting." I'm not exactly sure  
4 how she described it, but, you know, to a public meeting. And  
5 he just again very shockingly just said, you know, "Pay me" --  
6 you know, "pay me money and I'll go." And that's not  
7 appropriate. Then he made the inappropriate remarks.

8           Q.    And what were the inappropriate remarks?

9           A.    He said that he's going to go to the governor and  
10 Arnie Duncan, and he was going to humiliate the school  
11 district in the media.

12          Q.    Okay. At that point, did President Clark respond  
13 or did you and the other officers and counsel leave it alone?

14          A.    We just said that's -- "Pedro, that's not  
15 appropriate," several times saying that. So...

16          Q.    When you -- after you and the officers returned  
17 to the board room and there was some discussion about the  
18 severance package, do you know -- I'm trying to kind of figure  
19 out how the conversation -- and I know you had said it was  
20 very chaotic, and there was a lot of people tending to a lot  
21 of different things.

22          A.    Um-hum.

23          Q.    Can you remember how or who started those  
24 conversations, how it came down? I'm trying to kind of narrow  
25 down how.

1           A.    I -- so who like informed the others about what  
2 happened? I don't know if we -- I don't know how that  
3 happened.

4           MR. ROBISON: Watch it, you are covering your  
5 mouth. Thank you.

6           MS. RUGGERIO: Oh, sorry. I don't know how that  
7 part happened.

8 BY MS. DAVIES:

9           Q.    Okay.

10          A.    But I just remember Randy Drake saying, "I'm  
11 going to go and talk with him" and him leaving. I do remember  
12 that, so...

13          Q.    Okay. Did Randy Drake then come back with  
14 information to present to the Board?

15          A.    I think Randy Drake came back -- there was  
16 several visits back and forth and came back. I wasn't really  
17 paying too much attention to that because it was chaotic.

18                So we were spread -- so we had the -- we had  
19 tried a new setup in the board room, so it was a different  
20 setup than we usually have. And we were all spread out all  
21 over. We weren't sitting around the Board table.

22                And so there was -- I think Mr. Mayer was in the  
23 corner and maybe Trustee Aiazzi were kind of talking when  
24 Randy was coming back in. But I was on the other side of the  
25 room talking with Trustee Rosenberg, trying to --

1 Q. To calm him down?

2 A. Yeah. I mean, he wasn't excited, but he wanted  
3 to go jump in and help, and I just was trying to keep things  
4 at a minimum because it was kind of a crisis situation.

5 Q. Okay. So was there any time that you can recall  
6 that Counsel Drake or President Clark -- did President Clark  
7 ever ask for any input or anything regarding offering Pedro  
8 any sort of -- of a severance package to leave?

9 A. Did she ask me?

10 Q. Yeah, did she ask you?

11 A. No.

12 Q. Do you remember hearing her ever asking any other  
13 members of the Board?

14 A. I don't know. I just know that there was some  
15 conversation kind of going on in the corner, but nothing like,  
16 "How do you feel about this?" I mean, it wasn't that type of  
17 environment. It was very chaotic and uncomfortable.

18 Q. Okay.

19 A. They were worried because --

20 Q. So if I'm going to paint a picture -- and I don't  
21 want to -- but I'm trying -- the trustees and the board  
22 members were not sitting around a table with eight chairs  
23 having a conversation, you know, just very calm and everybody  
24 was kind of in different areas of the board room taking care  
25 of different things?

1 A. That's correct.

2 Q. Is that the picture?

3 A. That's exactly the picture.

4 Q. Okay. So what happens -- does -- do you know if  
5 President Clark then says, "This is" -- "this is what we're  
6 going to do. This is what we're going to offer him" or "this  
7 is" -- how did that portion finally end? Do you know?

8 A. I think -- I think someone said that  
9 Superintendent Martinez had left the building. And so, then  
10 the trustees filed out of the board room and into  
11 Superintendent Martinez's office. And that's when President  
12 Clark called in Communications staff.

13 Q. Okay.

14 A. And she was working with them and -- I believe to  
15 write a statement, a press release statement.

16 Q. Now, just out of curiosity, why would the  
17 trustees go into Superintendent Martinez's office --

18 A. Um-hum.

19 Q. -- as opposed to staying in the board room?

20 A. Well, because the board room -- well, one, it  
21 just wasn't -- it was set up differently that day. So, I  
22 think just to kind of keep an -- I think we were concerned  
23 about, you know, I was concerned about, you know, what was  
24 going to happen next. So I think, you know, when I found out  
25 Superintendent Martinez left, I may have even said, "Well,

1 let's go" -- you know, "into Superintendent Martinez's  
2 office."

3 Q. Okay. So then the trustees as well as the  
4 officers and Counsel Randy Drake are in his office?

5 A. Well, so let me explain what his office looks  
6 like.

7 Q. Okay.

8 A. His office is like several offices and a sitting  
9 area. You walk in. There's Superintendent Martinez's  
10 secretary's desk, and then you go down this way. There's the  
11 Board of Trustees' secretary's desk. And then over here is  
12 like a sitting area where there are couches and chairs and  
13 coffee.

14 Then there's an entrance into Superintendent  
15 Martinez's office.

16 Q. Okay.

17 A. So --

18 Q. So everybody -- all the trustees and the officers  
19 and Randy Drake are already in Superintendent Martinez's  
20 office at this time when he returns, or are you in kind of the  
21 outer annex area?

22 A. No. No, we are -- so when he returns the second  
23 time?

24 Q. Correct.

25 A. So, no, we're out of that office, not even the

1 entrance part where the secretary is. We're in the board room  
2 or in the hallway because they had just had a discussion with  
3 the leadership team.

4 Q. Okay.

5 A. President Clark. I wasn't there for the  
6 discussion. I was trailing -- I was trailing behind because I  
7 was waiting for Randy Drake and Trustee Aiazzi, and by the  
8 time I got there, President Clark had already finished talking  
9 to the leadership team. So I turned around -- I think I got  
10 into the board room, but all of the leadership team was  
11 already gone.

12 Q. Okay.

13 A. So we turned back around and came filing back  
14 into the general office area, Superintendent Martinez's office  
15 where the secretary and all that is. And then I noticed that  
16 Superintendent Martinez was there kind of squatted behind his  
17 desk.

18 Q. Okay. Were you present when President Clark  
19 informed Deputy Superintendent Tracy Davis of the events that  
20 had just occurred?

21 A. I should have been present.

22 Q. Okay.

23 A. Yeah. I was there.

24 Q. Do you remember what was said or --

25 A. No.

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Q. Okay.

A. Hum-um. No.

Q. Were you --

A. I was either at the table or I was right outside in the waiting area. But I was in right there in the vicinity, but I don't remember.

Q. But you don't remember actually being in with her when she informed the deputy superintendent of the events?

A. I may have been in there, but I don't -- I'm not saying that I was or wasn't. I just -- I don't have that memory.

But I was there, I mean, I remember seeing Tracy, but I don't know if I remember hearing President Clark tell her what was going to happen.

Q. Okay. Were you present when President Clark told Chief of Staff Kristin McNeel about the events that had just unfolded and what was going to happen?

A. I don't remember if I was there with Kristin either. I can't remember that part. I'm sure I was.

Q. Okay.

A. I'm, you know, that was the only place I was at. I don't know if I was right outside on the couches or in the office.

Q. Okay. But you don't have any recollection of actually what was said by President Clark to either Tracy

1 Davis or Kristin McNeel?

2 A. No.

3 Q. Okay.

4 A. I mean, I can kind of guess probably what was  
5 said.

6 Q. And I don't want you to guess.

7 A. Okay. Um-hum.

8 Q. If you were there and you remember, then  
9 obviously, I want you to tell me what you remember.

10 A. Um-hum.

11 Q. But if you don't, you don't.

12 A. Okay.

13 Q. So then Superintendent Martinez comes back and  
14 he's in his office. What is he doing at that time?

15 A. So when we walked back in, Superintendent  
16 Martinez was kind of squatted behind his desk. And I think I  
17 followed President Clark in, and she kind of said, you know,  
18 "Pedro, what are you doing?" And he ignored her. And I think  
19 she asked him again and he ignored her.

20 And then he kind of got up and was shuffling  
21 going through papers on his desk and then turned around,  
22 turned his back to President Clark and started taking things  
23 off his wall. He got on a chair and started taking things off  
24 his wall in his office by his desk.

25 Q. Okay. Were you ever present when President Clark

1 told Pedro Martinez that he was going to be placed on  
2 administrative leave?

3 A. No.

4 Q. Were you ever present when President Clark might  
5 have told Superintendent Martinez that he was -- his contract  
6 was being terminated?

7 A. No.

8 Q. Okay. What, as an officer of the Board, what was  
9 the -- what was the outcome -- what was the plan that you guys  
10 had, you know, because obviously, what I'm trying to figure  
11 out is you guys have this discussion about the CPA issue --

12 A. Um-hum.

13 Q. -- and then Pedro leaves and then he comes back.  
14 I'm trying to figure out what was told to Pedro and kind of  
15 how that all went down.

16 A. Um-hum.

17 Q. So --

18 MR. ROBISON: (Inaudible) the Board after the  
19 money --

20 MS. DAVIES: After the money.

21 MR. ROBISON. Okay.

22 MS. DAVIES: So he goes back -- after the money  
23 goes back and forth, I'm trying to figure out, did -- yeah,  
24 did President Clark tell him, you know, "You're fired, you're  
25 on administrative leave."

1                   MR. ROBISON: You left out -- you might as well  
2 go back and forth when Pedro left.

3                   MS. DAVIES: Right. He left and then he came  
4 back. So, I'm just trying to figure out --

5                   MS. RUGGERIO: So, when he came from in his  
6 office the second time?

7                   MS. DAVIES: Right. Just as a person, you would  
8 think that you wouldn't normally just walk out of your office  
9 and grab your stuff, you know. And so was there an instance  
10 that you were involved in or that you're aware of that he was  
11 told to leave the building, "You no longer work here, we don't  
12 want you here" -- those are all my words. But was there any  
13 sort of occurrence that happened that you're aware of that he  
14 was given some sort of information like that?

15                  A. Not that I'm aware of because the  
16 conversations -- like I said, it was an odd conversation to  
17 come from something -- you know, from the original discussion  
18 the way it -- the way it went. That was very troublesome. It  
19 was about money. He was very focused on he wanted money, and,  
20 you know, that was it. And it was not appropriate. It was  
21 not appropriate, and he was just -- he was agitated. He was  
22 just not being rational.

23                   And I was very worried because when he took all  
24 of the frames off of his wall, they were glass frames. So  
25 glass back to back, not -- not a certificate like where you

1 think -- you know, it was backed by cardboard. It was  
2 plastic. They were slipping out of his hands, and I became  
3 very concerned, you know, that they might get dropped, things  
4 like that. So that was kind of my focus was the whole safety  
5 and his demeanor.

6 Q. Okay. In reference to the complaint about the  
7 CPA issue, are you aware of -- were you aware of this  
8 anonymous complaint or how this complaint was -- came in to --  
9 to -- to the Board?

10 A. I think President Clark said that there was an  
11 anonymous complaint about it, and that's all I know.

12 Q. Okay. Did you know anything prior to that  
13 initial time when President Clark told you? Did you know  
14 anything about the complaint prior to that July 22nd board  
15 meeting?

16 A. No.

17 Q. Okay. So --

18 A. No.

19 Q. Okay. So were you aware of any internal  
20 investigation that took place regarding the -- the complaint?

21 A. No.

22 Q. Okay.

23 A. No.

24 Q. Okay. I think that's it for the 22nd meeting.

25 A. Okay.

1 Q. And I just want to clarify just at the end that  
2 you were not present during the discussions with the deputy  
3 superintendent -- I shouldn't say that. You weren't aware of  
4 what was exchanged between the president -- with President  
5 Clark and the deputy superintendent or the chief of staff?

6 A. Well, it wasn't that I wasn't aware. I remember  
7 seeing Tracy and Kristin there, but I do not remember what was  
8 said.

9 Q. You don't --

10 A. I assume -- I can tell you what I assume, but I  
11 could have been sitting right there at the table. I just  
12 don't remember. I was right out there in the chair.

13 Q. Okay.

14 A. But I was there.

15 Q. You were there?

16 A. Yes.

17 Q. Just don't remember what was said?

18 A. No.

19 Q. Okay. And you also don't know if anything was  
20 exchanged with President Clark and Deputy Superintendent  
21 Martinez as to what his -- what the outcome was, if she told  
22 him to, you know, leave the building or --

23 A. Superintendent Martinez.

24 Q. Yeah. What did I say?

25 A. Deputy.

1 Q. Oh, I apologize. I apologize.

2 A. (Inaudible).

3 Q. Did you guys get it? It's all these really long  
4 titles.

5 A. It's ridiculous.

6 Q. So were you aware of any conversation that  
7 President Clark had with Superintendent Martinez regarding the  
8 outcome of his current position?

9 A. No.

10 Q. Okay. So let me ask you, when you left that day,  
11 what did you think -- what did you think was going on?  
12 That -- did you believe that Superintendent Martinez would be  
13 back to work the next day or did you know that he was --  
14 that -- kind of tell me, what did you know?

15 A. Well, I mean, my assumption was he was on leave.  
16 And, you know, that's a good question. You ask what was next?  
17 I don't think we had gotten to that point yet.

18 It was so chaotic, you know. That's a -- that's  
19 a good question. I'm not even sure that we even knew the next  
20 steps after that because it was so -- so chaotic.

21 I mean, initially, it was we need to -- you know,  
22 "We need to have this at a public meeting, Pedro." But then  
23 things turned so inappropriate and so unexpected, I just  
24 think -- you know, we were all still in a little bit of shock  
25 about the behavior, honestly. You know, just how did this go

1 down this road?

2 Q. Okay. So I'm going to jump to the July 29th  
3 meeting that was held at counsel's office.

4 A. Um-hum.

5 Q. And I believe it was to discuss the lawsuit and  
6 some other issues that you guys had with counsel.

7 MR. MALLOY: The word we prefer, as you might  
8 guess, "gathering."

9 MS. DAVIES: Gathering.

10 MR. MALLOY: We're using "meeting" in the  
11 non-open meeting law sense and just in the dictionary.

12 MS. DAVIES: Exactly.

13 MR. MALLOY: Okay.

14 BY MS. DAVIES:

15 Q. Were you aware of the statement that President  
16 Clark put out on July 31st?

17 A. No.

18 Q. And I speak of the statement where she -- she  
19 writes out that rather -- this is part of it: "Rather than  
20 debate this complicated issue, we have agreed that last week's  
21 events are void. Superintendent Martinez was never terminated  
22 or fired as superintendent of the Washoe County School  
23 District, and we expect him to return to work and fulfill his  
24 responsibilities and duties immediately."

25 A. I read that statement on Twitter.

1 Q. Okay. So you were not aware of this statement?

2 A. That she made the statement, no. No.

3 Q. Okay. Had there been any discussion during the  
4 gathering or the meeting with your counsel regarding this  
5 prior? Did you know anything about it at all?

6 MR. MALLOY: Are you asking what the discussion  
7 was at the gathering with Mr. Robison?

8 MS. DAVIES: Just if she had any knowledge of --  
9 that the statement was going to be made.

10 MR. MALLOY: And are you asking if she gained  
11 that knowledge at the meeting with Mr. Robison?

12 MS. DAVIES: Yes.

13 MR. MALLOY: And the discussions with Mr. Robison  
14 is privileged.

15 MS. DAVIES: True.

16 BY MS. DAVIES:

17 Q. So the first time that you read this statement  
18 was --

19 A. Was on Twitter.

20 Q. -- was on Twitter. Okay.

21 A. And I was not at that meeting the whole time.

22 Q. Okay. So if we look at it, and I just want to  
23 know if you know --

24 A. Um-hum.

25 Q. -- having spoken with -- have you spoken with the

1 trustees or any of the other officers since the July 22nd  
2 meeting about what's been going on?

3 A. Well, just the emotion of it, just --

4 Q. Okay.

5 A. -- you know, this is horrible.

6 Q. Okay. So do you know who President Clark is  
7 referring to in this when she says "we have agreed"?

8 A. Can I --

9 Q. Absolutely. You -- yeah, you can -- it's -- I'm  
10 just wondering if --

11 A. Somewhere, somewhere.

12 Q. Probably halfway down towards the right-hand  
13 side.

14 MR. MALLOY: Beginning of the sentence.

15 MS. DAVIES: Yeah.

16 MS. RUGGERIO: Me and --

17 MS. DAVIES: -- and I don't want you to -- I  
18 don't want you to guess.

19 MS. RUGGERIO: Um-hum.

20 MS. DAVIES: I'm just wondering if you know if  
21 she's speaking of the Board or of herself and counsel, if you  
22 even know.

23 MS. RUGGERIO: I don't know, but I would think --

24 MS. DAVIES: Perfect.

25 MS. RUGGERIO: You don't need --

1 MS. DAVIES: I don't want you to guess, no. No.

2 MS. RUGGERIO: Oh, okay.

3 BY MS. DAVIES:

4 Q. So then what I do want to ask you, though, if she  
5 says "we have agreed that last week's events are void" --

6 A. Um-hum.

7 Q. -- if she's saying that -- what do you think --  
8 what's void in the events that took place last week?

9 A. I don't want to sound dumb, but I really don't  
10 know.

11 Q. Okay.

12 A. To be honest with you.

13 Q. That's fine.

14 A. Okay.

15 Q. Yeah. And like I said before, I don't want you  
16 to guess.

17 A. Okay.

18 Q. If you don't know, you don't know.

19 A. Sorry.

20 Q. That's okay. Don't be sorry.

21 In reference to a court filing that was filed on  
22 behalf of this office in response to a complaint on the 29th  
23 of July regarding some deficiencies of Superintendent  
24 Martinez, are you aware of that court filing?

25 A. I just became aware of that court filing.

1 Q. Okay. And what do you know in reference to the  
2 information regarding his deficiencies, if you can share?

3 A. Like what do you mean?

4 MR. MALLOY: Are you asking her what she knows  
5 about what they are?

6 MS. DAVIES: Right. Correct. What you know.

7 MS. RUGGERIO: I didn't read it.

8 MS. DAVIES: Okay.

9 MS. RUGGERIO: I'm trying not to read anything  
10 because I just don't think I can handle it. I'm just staying  
11 away from the media or anything. Just every once in a while,  
12 I'll look at Twitter because it's least painful. So just to  
13 kind of get a, you know, just maybe a little bit of what's  
14 happening. But I have not read anything in detail. I plan  
15 to, but at this point, I just can't.

16 BY MS. DAVIES:

17 Q. Okay. At any time during --

18 A. That sounds really irresponsible as a public  
19 official.

20 MR. MALLOY: It's understandable. Don't worry  
21 about it.

22 MS. RUGGERIO: I'm just trying to stay away from  
23 the newspapers.

24 MS. DAVIES: I think it would -- it's almost a  
25 full-time job to read it.

1 MS. RUGGERIO: Yeah, but it's not because I don't  
2 want to know about it. I just think -- right now, I'm just  
3 trying to take everything step by step.

4 MR. MALLOY: Give yourself a break. You'll read  
5 it and see it all eventually.

6 MS. RUGGERIO: Yeah, I hear it's horrible. So --  
7 BY MS. DAVIES:

8 Q. At any time during the time that Barbara Clark  
9 called -- gavelled for a legal meeting to the time that Pedro  
10 Martinez left the building for the final time with his  
11 certificates in hand and whatnot --

12 A. Okay. This is July --

13 Q. This is July 22nd. I apologize.

14 A. Okay.

15 Q. Did you ever receive any advice from legal  
16 counsel? And I don't want to know what it was, if he shared.  
17 I just want to know if legal counsel gave advice to you as an  
18 officer to do or not do something.

19 MR. MALLOY: So you're just asking for a "yes" or  
20 "no"?

21 MS. DAVIES: Correct. Yes.

22 MS. RUGGERIO: So --

23 MR. MALLOY: The answer would be "yes" or "no."

24 MS. RUGGERIO: Yes.

25 ///

1 BY MS. DAVIES:

2 Q. So at some point during --

3 A. Just at the beginning of the meetings, he always  
4 says this is --

5 Q. And, like I said, I don't want to break that  
6 client --

7 A. Oh, okay.

8 Q. -- attorney/client privilege. So I don't want to  
9 know --

10 A. Oh, okay.

11 Q. -- what was shared.

12 MR. MALLOY: That's why I said to make sure to  
13 say "yes" or "no."

14 MS. RUGGERIO: Oh, okay.

15 BY MS. DAVIES:

16 Q. No, no, that's okay. So that's why I say at some  
17 point, did he give you legal advice as an officer to do or not  
18 do.

19 MR. MALLOY: You understand she's not asking what  
20 the advice was, but she's only asking if advice was given.

21 MS. RUGGERIO: Yes. Just -- yes.

22 BY MS. DAVIES:

23 Q. Okay. At the beginning of the meeting?

24 MS. RUGGERIO: Am I supposed to answer that?

25 MS. DAVIES: You can answer that because you're

1 not sharing.

2 MS. RUGGERIO: Okay.

3 MR. MALLOY: You're not sharing what the advice  
4 is.

5 BY MS. DAVIES:

6 Q. Yeah. I just don't want to know like the  
7 conversation that he shared with you guys.

8 A. Okay. Just business as usual.

9 Q. Okay. Was that the only time that he gave you as  
10 an officer any legal advice?

11 A. Well, I mean, he's always with us, so --

12 MR. MALLOY: Wait a minute. Wait a minute. Are  
13 you talking about Randy Drake now?

14 MS. DAVIES: Yes.

15 MR. MALLOY: Okay.

16 MS. DAVIES: Yes.

17 MR. MALLOY: All right. I misunderstood a little  
18 bit.

19 MS. DAVIES: I am only speaking of Randy Drake  
20 because he was the only counsel that was there during that  
21 July 22nd --

22 MS. RUGGERIO: Um-hum.

23 MS. DAVIES: -- entire event, I should say.

24 MS. RUGGERIO: I mean, I just depend on him to  
25 guide me in whatever I do. So --

1 MS. DAVIES: Okay.

2 MS. RUGGERIO: Because I am new to being an  
3 elected official, so I am very dependent on his guidance.

4 MS. DAVIES: Okay.

5 MR. MALLOY: And I apologize for the  
6 misunderstanding.

7 MS. DAVIES: That's okay.

8 MR. MALLOY: I thought you were talking about  
9 Mr. Robison.

10 MS. DAVIES: Gotcha. No, that's okay. I'm glad  
11 we got that cleared up.

12 I think that's all I have. Kent just stepped out  
13 of the room. He stepped out of the room probably about  
14 15 minutes ago.

15 Michael, do you have any questions?

16 MR. MALLOY: I do not.

17 MS. DAVIES: Okay. Do you have any questions for  
18 me?

19 MS. RUGGERIO: So, what will happen? What's --

20 BY MS. DAVIES:

21 Q. What I can tell you it's an open investigation  
22 that my office is conducting. I'll continue the interviews  
23 that I need to gather all my information from both sides.

24 That's pretty much what I am, a fact gatherer.

25 A. Okay.

1           Q.    I put it all together.  I give all of the audio  
2 to my attorney.  I give him all my notes and everything, and  
3 then at that point, he goes through everything and makes his  
4 decision on, you know, on where to go from here.

5           A.    Um-hum.

6           Q.    And then, you know, at that point, then I know  
7 Kent and Michael will be, you know, aware of that.  And I  
8 can't tell you how long.

9                    We hope that this is kind of on the fast track.

10          A.    Um-hum.

11          Q.    But I don't know.  So...

12          A.    Okay.

13          Q.    But obviously, you can always make contact with  
14 Kent or Michael to kind of see the status and find out, and  
15 they can always contact me and I, you know, I have no problems  
16 like if it's still going on and I'm still doing interviews, I  
17 will share that with them.

18                   And if I'm done with my investigation, I will  
19 share that with them as well and say, you know, my  
20 investigation is complete and I've handed it off to my  
21 attorney.

22          A.    Um-hum.

23          Q.    And then at that point, you know, then it just  
24 goes from there.  So --

25          A.    Okay.  Thank you.

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MS. DAVIES: You're welcome.

Any other questions?

MS. RUGGERIO: No.

MS. DAVIES: Okay. So what I'll do is go ahead  
and end the interview.

The time is approximately 1:59 p.m. It is  
August 5th, 2014, and I'm going to stop the recording.

(Proceedings concluded.)

1 STATE OF NEVADA, )  
2 CARSON CITY. ) ss.

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I, Michel Loomis, do hereby certify:

That on August 5, 2014, an interview was held in the within-entitled matter in the office of Kent Robison.

That said interview was recorded, and said CD-ROM was delivered to me for transcription;

That the foregoing transcript, consisting of pages 1 through 38, is a full, true and correct transcript of said recorded CD-ROM performed to the best of my ability.

Dated at Carson City, Nevada, this 14th day of August, 2014.

Michel Loomis, Transcriber