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BEFORE THE STATE PUBLIC CHARTER SCHOOL AUTHORITY

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In re:  
NEVADA CONNECTIONS ACADEMY.

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ADMINISTRATIVE HEARING

DEPOSITION OF

MINDI DAGERMAN

JULY 6, 2017

Carson City, Nevada

REPORTED BY: DEBORA L. CECERE NV CCR, #324, RPR

JOB NO.: 403762D

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A P P E A R A N C E S

FOR THE STATE OF NEVADA

SENIOR DEPUTY ATTORNEY GENERAL  
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FOR NEVADA CONNECTIONS ACADEMY

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BY: LAURA GRANIER, ESQ.  
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ALSO PRESENT:

PATRICK GAVIN

STEVE WERLEIN

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I N D E X

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E X H I B I T S

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Original Exhibits to Original Transcript.

1 BE IT REMEMBERED that on Thursday, the 6th day  
2 of July, 2017, at the hour of 2:47 p.m. of said day at the  
3 Offices of the Attorney General, 100 North Carson Street,  
4 Carson City, Nevada, before me, DEBORA L. CECERE, a  
5 certified court reporter, personally appeared MINDI  
6 DAGERMAN, who was by me first duly sworn, and was examined  
7 as a witness in said cause.

8 -oOo-

9  
10 (Exhibit Number 1 was marked for  
11 identification.)

12  
13 MINDI DAGERMAN,  
14 called as a witness in said case,  
15 having been first duly sworn, was  
16 examined and testified as follows:

17  
18 CROSS-EXAMINATION

19  
20 BY MR. OTT:

21 Q Could you spell your last name for the record?

22 A Dagerman, D-A-G-E-R-M-A-N.

23 Q Your declaration states on page 1, paragraph 12,  
24 that you've been a board member since 2008?

25 A Yes.

1           **Q       Can you describe any board trainings that you**  
2     **have attended during your time at the NCA board?**

3           A       You're asking me to go back really far, but I'm  
4     going to do my best.

5                   I went to a board of academy training when I  
6     first came on the board. That was back in Baltimore. It  
7     gave me a good understanding of what the, what the  
8     Connections Education, at the time Connections Academy,  
9     does, how they provides their services.

10                  They gave training on Roberts Rule of Order.  
11    They really talked about what is it like to be an effective  
12    board member.

13                  I've attended board meetings. We've had some  
14    leadership board trainings on our own, and I do my best to  
15    try and go to the charter school conference where I  
16    actually saw Patrick a couple of weeks ago, to really get  
17    some insight on what other schools are doing and what's  
18    working for other schools and network with other boards.

19                  And it also gives me an opportunity to meet with  
20    some of the Connections Education staff. And I also get to  
21    meet other Connections board members.

22           **Q       Are there any annual trainings that you do every**  
23     **year?**

24           A       Not that I'm aware of. I try to do the charter  
25     school conference every year.

1 I have attended one of the state's board  
2 trainings. I can't remember what it's called, off the top  
3 of my head. But I've attended one of those. But there's  
4 not a consistent training.

5 I talk a lot with my hands. I'm sorry.

6 **Q Can you provide an estimate of how much of your**  
7 **time is spent per month on your duties as an NCA board**  
8 **member?**

9 A It really varies. We always have at least an  
10 hour to a three-hour meeting, but I do spend time reviewing  
11 the documents provided for the board meetings. I ask any  
12 questions on those, if I have specific questions  
13 beforehand.

14 Sometimes if I think they'll take a while to put  
15 together I'll ask them ahead of time, otherwise I'll bring  
16 them to the board meeting and ask them at that time.

17 Lately, with everything that has been going on  
18 with the notice of school closure, there's been a lot more.  
19 So I don't have a specific number, but I'm very dedicated  
20 to the board, so I do want to put in the time that it takes  
21 to be effective.

22 I also work full-time in Carson City, and also  
23 I'm a mom so I have a lot to juggle.

24 **Q As a board member, do you believe graduation**  
25 **rate is an important measure of the success of your school?**

1           A       I do.

2           **Q       Were you are aware of any plan to improve the**  
3 **graduation rate of NCA in or around NCA's charter renewal**  
4 **in 2013?**

5           A       I was. So that plan was a little different than  
6 the plan that was proposed this year, 2016. So it all  
7 seems like the same year to me.

8                    But it was more of a comprehensive school plan,  
9 is the way I recollect.

10                   To remember the specifics I'd have to re-review  
11 that document. But it really looked at the whole school  
12 from the Kindergarten to a 12th grade aspect and provided  
13 some areas of improvement at all the levels. The 2016 plan  
14 is really focused on cohort grad rate for four-year cohort.

15           **Q       Did you have any role in formulating or**  
16 **implementing the 2013 plan?**

17           A       I remember discussing it at a meeting, but I  
18 don't remember all of the details. That was quite a few  
19 years ago. But I had complete faith in the leadership team  
20 at that time.

21           **Q       Did the board have any consideration as a whole**  
22 **as to whether that that plan was a success?**

23           A       I don't remember.

24           **Q       Do you personally have any opinion about whether**  
25 **that plan was successful?**

1           A        I've seen a lot of improvement in the school and  
2 a lot of different measures.

3                    I've seen consistent parent satisfaction.

4                    I've seen increase in the student performance  
5 metrics that we discuss at each one of our meetings.

6                    I'm really not the educational resource on our  
7 board. I'm really the business resource. But Jafeth and  
8 Steve and Rissa, I totally just spaced our other teacher on  
9 the board. I'm sorry.

10                   MR. WERLEIN: Tessa.

11                   THE WITNESS: Tessa. I'm nervous.

12                   MS. GRANIER: Everybody is staring at her.

13                   THE WITNESS: I know.

14                   MS. GRANIER: You're fine.

15                   THE WITNESS: I'm not used to it.

16                   They have a great grasp of education in Nevada.  
17 And I really lean on them for those educational metrics.

18                   And Steve has been great. He's really put up  
19 with a lot of my really ignorant questions, I guess, to say  
20 well, how does this work, and how can we apply this.

21                   And I ask him a lot of questions about math  
22 curriculum. So I think that they've been really open and  
23 honest with me, which I really appreciate as a board member  
24 saying here's where we are, and here's where we can still  
25 go.

1 BY MR. OTT:

2 Q With regard to the 2013 plan, which is what I  
3 was asking you about, is it fair to say that your  
4 evaluation of the success of that plan was dependent upon  
5 the other education professionals on the board and the  
6 school?

7 A Yes.

8 Q Your declaration states on page 2, line 25,  
9 that:

10 The board approved scholarships for  
11 student credit recovery.

12 A Yes.

13 Q Can you explain to me what that means?

14 A So that was providing scholarships for summer  
15 school to allow credit deficient students an opportunity to  
16 attend summer school for free to them, the school would pay  
17 for it, to help increase the credit recovery of those  
18 students.

19 The school's leadership team put together a  
20 matrix and was approved for the board for here's the order  
21 of how we want to provide these scholarships, the top being  
22 the most credit deficient student, at the principal's  
23 discretion, and at the very lowest bottom was for  
24 enrichment.

25 Q And the program that you're just describing is

1 different from the Grad Point program that you reference on  
2 page 4, line 4 of your declaration, correct?

3 A Yes.

4 Q Who provided this summer school?

5 A I believe it's the Connections Education through  
6 their private school. I'm not sure if that's right.

7 Q Do you know what the cost was for those seats?

8 A I do not remember.

9 Q But those costs were always picked up by the  
10 school?

11 A Yes. And so it was actually approved as an  
12 amount where the leadership team said we'd like to offer X  
13 number of dollars for these scholarships, and the board  
14 said yes. As for how those were used, that was the school  
15 leadership, but I feel that's an operations function.

16 Q Do you have a name of what you call this program  
17 so that I can call it something other than Grad Point,  
18 because Grad Point is different?

19 A It is different. I would call it a summer  
20 school recovery, but if you want the official name, I would  
21 ask Steve.

22 Q Mainly I just wanted something so that I could  
23 say it, and you would know what I was talking about.

24 A Yeah.

25 Q Was there any consideration by the board to, to

1 offer this summer school itself instead of contracting with  
2 a third party?

3 A I'm not sure.

4 Q Do you know when these scholarships were first  
5 approved?

6 A I don't remember, but it was before we  
7 implemented Grad Point.

8 Q You talked a little bit about the implementation  
9 priority matrix a second ago.

10 A Yes.

11 Q And you also reference it in your declaration on  
12 page 2, line 26.

13 That means that the program was not available to  
14 all students, correct?

15 A It was available for all students to pay. The  
16 scholarships were not available to all students.

17 So if the parents wanted to pay for summer  
18 school, they could, just like at the high school I went to  
19 in Henderson.

20 But the scholarships were available based on the  
21 priorities that were set forward, the top being credit  
22 recovery.

23 Q Do you know when Pearson Education created the  
24 Grad Point program?

25 A No.

1           **Q       When did you first learn about it?**

2           A       I learned about it in the board meeting when it  
3 was first presented to the board to approve. So I'm not in  
4 the education world every day.

5                   So I really rely on the school's leadership team  
6 and my educational board member counterparts to help me  
7 with that side.

8           **Q       Your declaration states on page 4, line 7, that:**

9                   **The Graduation Rate Improvement --**  
10                   **that a Graduation Rate Improvement**  
11                   **Plan that was developed by the school**  
12                   **and presented to the board for their**  
13                   **review, and that the board accepted**  
14                   **most of that plan but expressed some**  
15                   **concern in particular areas.**

16           **Q       Can you explain what the board's areas of**  
17 **concern were?**

18           A       Our biggest concern, to be truly honest with  
19 you, is a hundred percent board reconstitution. I think  
20 that having a stable board is important for a school as it  
21 improves.

22                   We also struggle finding board members. It's a  
23 big struggle to find qualified board members who are going  
24 to be engaged.

25                   And so for us to have to reconstitute all seven

1 of us at once when right now we have a hard time just doing  
2 one, it would be hard for us.

3 (Exhibit Number 2 was marked for  
4 identification.)

5 BY MR. OTT:

6 Q So I, I had marked as Exhibit 2 the minutes from  
7 the January 25, 2017, meeting where I believe --

8 A All right. I don't want to get all these mixed  
9 up.

10 Q And there is a portion on the second page that  
11 talks about reconstitution.

12 A Um-hum.

13 Q Why don't you take a second and look at that to  
14 familiarize yourself with it.

15 A Yes.

16 Q So that reconstitution that was approved by the  
17 board doesn't call for reconstitution all at once, correct?

18 A Correct.

19 Q That calls for it over a period of time?

20 A Yes.

21 Q Were you supportive of that reconstitution plan?

22 A Yes.

23 Q Does that plan reflect concerns that the board  
24 brought to it to change it from an initial form that's not  
25 reflected in this document?

1 A Yes.

2 Q Do you know what the original form was?

3 A I think -- I can't remember off the top of my  
4 head. I think it's because I'm nervous. I'm sorry.

5 Q That's okay. Do you think --

6 A But I know it was, it was approved to be one  
7 board member a year.

8 Q Do you think reconstitution of the board will be  
9 helpful for the school?

10 A A complete reconstitution, no. But I do think  
11 good change is important. I think it's good to bring new  
12 skills and ideas to the board.

13 Q Do you think that reconstitution plan that has  
14 been approved by the board will be beneficial for the  
15 school?

16 A Yes. I think it would be.

17 Q Do you believe it was necessary to adopt a plan  
18 to increase the graduation rate of 2016?

19 A Yes. Given our situation with the notice of  
20 closure, yes.

21 Q Assume for a second that there was no notice of  
22 closure.

23 Do you think it would have been necessary to  
24 adopt a Graduation Rate Improvement Plan at that time?

25 A Yes.

1 Q Why?

2 A I think every high school student in Nevada  
3 deserves the right to graduate from high school. And I  
4 think our goal, which I know we've mentioned in quite a few  
5 meetings, should be a hundred percent graduation rate. The  
6 more we can do to help kids get that diploma and have that  
7 sense of pride we should do.

8 Q Does the board adopt a Graduation Rate  
9 Improvement Plan every year?

10 A I am not sure.

11 Q Other than the 2013 plan, which was I think  
12 described as a Comprehensive School Improvement Plan, and  
13 the 2016 Graduation Rate Improvement Plan, has the board  
14 ever adopted another Graduation Rate Improvement Plan?

15 A I'm not sure.

16 Q You're not aware of any, correct?

17 A I'm not sure.

18 Q Do you believe that this 2016 plan will increase  
19 NCA's graduation rate?

20 A The numbers that I have seen have been positive.  
21 And that they're already working to improve the graduation  
22 rate. As a board we found that the incoming population has  
23 been changing where we're seeing a lot more students who  
24 are credit deficient coming in. And we want to help those  
25 kids. We won't turn them away.

1           Q       When I asked you about the effectiveness of the  
2 success of the 2013 plan, you, I believe, said that you  
3 relied somewhat on the education professionals on the board  
4 and also in the school.

5                   Is that accurate?

6           A       Yes.

7           Q       Would that also be true of the 2016 plan in  
8 evaluating its effectiveness?

9           A       I think this one is a little more transparent.  
10 It's one metric not many. So it would be easier for me,  
11 I've grown a lot as a person and as a professional since  
12 2008. 2008 was my first year out of college. So I think  
13 I'd be in a better place to make an evaluation of that.  
14 And I wouldn't be afraid to ask questions if I had them.

15          Q       I want to talk for a second about the benchmarks  
16 that have been approved by the board on the bottom of page  
17 2 of Exhibit 2.

18                   Do you understand the way the Department of  
19 Education calculates graduation rate?

20          A       No, that's not my strength.

21          Q       There is a statement below the three benchmarks  
22 on that document.

23                   Do you know who's responsible for putting that  
24 statement there?

25          A       No.

1           **Q       When the plan was presented to the board, was**  
2 **there an explanation of how graduation rate would be**  
3 **calculated?**

4           A       I don't remember. I know that there was a  
5 presentation that discussed the numbers and how these  
6 numbers weren't formulated. But I can't remember that  
7 formal meeting.

8           MS. GRANIER: And there was a closed session  
9 with counsel that is protected by the attorney-client  
10 privilege. So to the extent that you're asking her to  
11 disclose any communications or discussions with counsel, I  
12 will object and direct her not to reveal any of those  
13 discussions.

14           MR. OTT: Sure. And just for the record, I'm  
15 not.

16           THE WITNESS: I don't remember.

17 BY MR. OTT:

18           **Q       Okay. I would like to list a few corrective**  
19 **actions that have been mentioned by the SPSCA board or**  
20 **implemented or considered by other boards who have been**  
21 **facing accountability measures?**

22           A       Okay.

23           **Q       And I'd like to ask if the NCA board has been**  
24 **considered -- has considered these or if you feel like it's**  
25 **something they should consider?**

1 A Okay.

2 Q Enrollment caps?

3 And when I say that, do you understand what I  
4 mean by enrollment caps?

5 A Can -- explain to make sure we're on the same  
6 page.

7 Q Sure. So an enrollment cap would be a limit on  
8 the amount of students that could be enrolled in any  
9 specific grade.

10 A So we have discussed enrollment caps back when  
11 it related to count day, in order to stabilize our funding.  
12 But I don't know what the leadership team has discussed.

13 Q But as far as the board, the only discussion of  
14 enrollment caps was back with regard to count day.

15 A Yes.

16 Q So it has not been discussed with regard to  
17 graduation rate improvement?

18 A Not that I'm aware of.

19 Q Do you have an opinion about whether it's  
20 something that should be considered?

21 A Like I mentioned earlier, I really feel like  
22 every student should have a chance to graduate, and some of  
23 the families that I have met with outside of events,  
24 they'll see our NCA backpack, or our NCA T-shirt, and or  
25 I'll overhear them talking about the school, and they've

1 said this is really our last resort, it's been a huge help.  
2 So it would really pain me to say no, we can't help your  
3 kid.

4 **Q How about transitioning the school to be**  
5 **measured under the Alternative Performance Framework?**

6 A So I think that there's a lot of stuff that our  
7 school does. I know we've discussed the creation of the  
8 separate high school for the -- I can't remember the name  
9 off the top of my head -- really focused on improvement and  
10 a lot more one-on-one support with students and teachers,  
11 which I think would fall under this.

12 Can you read it one more time?

13 **Q Sure. Maybe I should ask first, do you know**  
14 **what the Alternative Performance Framework is?**

15 A Maybe I don't.

16 **Q I will represent to you that NRS 385A.740 sets**  
17 **up a system for schools to be measured in a different**  
18 **manner if they meet certain criteria.**

19 **And what I'm asking is if the board has**  
20 **considered transitioning to try to be evaluated under those**  
21 **criteria instead of the criteria in which they are --**

22 MS. GRANIER: And I'm going to object because  
23 that's an incomplete description of that. You left out a  
24 material fact, which is that your population must be at  
25 least 75 percent at risk.

1 So I'm concerned about the witness being misled.

2 I'm also concerned about this line of  
3 questioning. I think it is way beyond the scope, not just  
4 of the declaration, but beyond this scope of this phase of  
5 the hearing.

6 This phase of the hearing is simply whether or  
7 not the 60 percent has been triggered, and that we should  
8 move on to the next phase to consider closure or  
9 reconstitution.

10 So I don't know how this is, you know, within  
11 the scope. It sounds like you're trying to conduct a  
12 negotiation. And we are very happy to have those  
13 discussions with you. We've offered numerous times. But I  
14 don't think cross-examination is the preferred place to do  
15 that.

16 And finally, the, what is discussed at board  
17 meetings is in the public record. These are, the board, as  
18 you know, is subject to the open meeting law. The minutes  
19 are public records. They're provided, I believe, to the  
20 authority. They're certainly provided to the, the  
21 Department of Education, so I think it's burdensome and a  
22 misuse of everyone's time to sit here and ask her questions  
23 that could be found in the public record.

24 MR. OTT: So with regard to the negotiation, I'm  
25 not trying to negotiate. I'm just trying to get an

1 understanding of what she has considered.

2 With regard to the hearing, I understand that  
3 there's two phases. My understanding is that pursuant to  
4 our conversation during the hearing, we were basically  
5 given a broader scope with the understanding that some of  
6 the stuff was going to be relevant to both phases of the  
7 hearing. And my hope is not to have to call Ms. Dagerman  
8 back for the second phase of the hearing if I can avoid it.  
9 So I would like to spend a little bit of time today to  
10 hopefully help cure her of that inconvenience.

11 I forgot your other objection.

12 MS. GRANIER: This is all public record. These  
13 are public meetings. Anyone can attend except for what she  
14 can't disclose to you because it's in a closed session.

15 BY MR. OTT:

16 Q Let me explain. That is a good clarification.

17 In addition to what may have gone on at public  
18 meetings, in your time speaking with education staff or at  
19 meetings that you may have attended, and trainings, I'd  
20 like to know if any of these things have come to your  
21 attention.

22 A No. Most of these discussions -- well, all of  
23 these discussions that I can remember happened in public  
24 record.

25 Q Okay. A couple more. I'm not going to spend

1 too much time on these.

2 **Eliminating the high school?**

3 A As in getting rid of it?

4 **Q Um-hum. That's a yes.**

5 A Not that I'm aware of. Again, we want to reach  
6 as many students as we can, and we want to help them get  
7 their diploma.

8 **Q Considering a change in the education management**  
9 **organization?**

10 A Not that I remember.

11 **Q Changing school leadership?**

12 A No.

13 **Q Do you believe that there's anything that could**  
14 **be done to increase NCA's graduation rate that is not**  
15 **currently being done?**

16 A No.

17 **Q Do you believe the graduation rate will increase**  
18 **as a result of the measures currently being implemented?**

19 A Yes. And I have seen some of those increases  
20 already.

21 **Q Do you believe that NCA will be able to achieve**  
22 **a graduation rate of 60 percent as calculated by the**  
23 **Department of Education?**

24 A I'm not sure now that calculation is done, so I  
25 can't give you an answer.

1 MR. OTT: That's all I have.

2

3

REDIRECT EXAMINATION

4

5 BY MS. GRANIER:

6 Q Mr. Ott asked you about whether the board has  
7 considered a change in the school leadership.

8 And you said not that you're aware of.

9 A Um-hum.

10 Q Are you aware of any reason that the board  
11 should have been considering a change in the school  
12 leadership?

13 A No, we have been very happy with Steve and his  
14 performance. He has always been willing to answer my  
15 questions. He's even put up with some of my, what I terms  
16 myself "stupid questions," just because I'm not aware of  
17 the educational side of it.

18 He's always been patient with me. And I always  
19 love hearing about what we're doing to increase our math  
20 scores and our math retention. And so he entertains a lot  
21 of those questions for me, and I appreciate it.

22 Q Any indication to you that he doesn't have the  
23 expertise or -- well, the expertise to be doing the job  
24 he's been assigned?

25 A No.

1           **Q       Any indication that his lack of leadership is a**  
2           **reason for a low graduation rate at NCA?**

3           A       No. In fact, we've actually seen an increase in  
4           parent satisfaction and also an increase in our teacher  
5           satisfaction.

6                     So I find it very positive that our teacher  
7           satisfaction is still very high given that we're under a  
8           very stressful situation with the notice of closure.

9           **Q       And with respect to Mr. Ott's question of**  
10          **whether the board has considered a change in the EMO for**  
11          **the school, has there been any reason for the school to**  
12          **consider a change in the EMO?**

13          A       No. I've been very happy with the curriculum.  
14          The EMO actually let's us weigh in on having a board member  
15          present on the curriculum committee and on the student  
16          handbook committee.

17                     They've always opened their doors with open  
18          arms, and they've been very straightforward with the data  
19          and providing that.

20                     And, again, a lot of Connection staff has put up  
21          with some of my more stupid questions because I'm not from  
22          the educational world.

23          **Q       And, in fact, does the board conduct a review of**  
24          **the EMO?**

25          A       We do.

1 Q On an annual basis?

2 A Yes.

3 Q Do you know if that report is submitted to a  
4 state agency like NDE or the authority?

5 A I'm not aware.

6 Q Have you ever received any concerns from the  
7 authority or the Nevada Department of Education that, that  
8 the school should consider changing its EMO?

9 A No.

10 Q With respect to closing the school's high  
11 school, do you believe that would be an appropriate part of  
12 a cure?

13 A No. I think I think we're doing what we can to  
14 help a very targeted population. We're seeing a very large  
15 increase of credit deficient students who may not have  
16 somewhere else to go to get that high school diploma.

17 And like I said before, I really want to see a  
18 hundred percent of high school students graduate.

19 Q And you mentioned that you've seen an increase  
20 in the graduation rate just in the last year.

21 During that same period of time, do you know,  
22 have the number of newly enrolled credit deficient students  
23 also increased?

24 A I feel like the answer should be yes, but I  
25 can't remember the exact numbers off the top of my head.

1 But that is a question I know my educational side board  
2 members asks Steve very regularly.

3 Q And Mr. Ott asked you if you feel that  
4 graduation rate is an important measure at the school, and  
5 you said yes.

6 A Um-hum.

7 Q And is that -- I need you to say "yes."

8 A Yes.

9 Q For the court reporter.

10 A Right. Sorry. I said yes, just quietly.

11 Q Do you believe it's appropriate to judge the K  
12 through 12 school's performance solely based on the  
13 four-year cohort graduation rate for the high school?

14 A No, I think there are a lot of other measures.  
15 The State has various different levels of testing that I  
16 think are important to look at.

17 Also, I think it's important to look at the  
18 population of the school to see are we helping those  
19 individual students who do come to us that are credit  
20 deficient? Are they improving? Are they learning? Are,  
21 are they making successful decisions. And what are they  
22 doing afterwards? Are they still being successful?

23 So I think parent satisfaction, as a parent with  
24 a Kindergartner, it's very important if you're happy with  
25 your school and the way your school communicates. And this

1 year some of the highest parent satisfaction numbers that  
2 I've seen, so I think that's also an important measure.

3 Q Is it your desire to work with the authority to  
4 find an acceptable cure?

5 A Yes.

6 Q And is it your desire that that cure allow this  
7 school to continue serving all students, K through 12?

8 A Absolutely.

9 Q Why?

10 A Same reasons I've mentioned before. I care  
11 deeply about the State of Nevada. I was born in Henderson.  
12 I moved up to UNR. I loved the area. Very outdoors  
13 family. And this is where I wanted to raise my kids.

14 So I would be heartbroken if I wanted an  
15 opportunity for my child, and the school said no, you don't  
16 meet our criteria. I want to help every single kid that we  
17 can.

18 And I think that the individualized learning  
19 that Connections offer is a very unique item to be offered  
20 here in the State of Nevada.

21 Q Thank you.

22 A You're welcome.

23 MR. OTT: Go off the record.

24 (Whereupon the deposition was  
concluded at 3:17 p.m.)

25 -oOo-

1 STATE OF NEVADA )  
2 WASHOE COUNTY ) ss.

3 I, DEBORA L. CECERE, a Certified Court Reporter, State  
4 of Nevada, do hereby certify:

5 That on Thursday, the 6th day of July, 2017, at the  
6 hour of 2:47 p.m. of said day, at 100 North Carson Street,  
7 Reno, Nevada, personally appeared MINDI DAGERMAN, who was  
8 duly sworn by me to testify the truth, the whole truth, and  
9 nothing but the truth, and thereupon was deposed in the  
10 matter entitled herein;

11 That I am not a relative, employee or independent  
12 contractor of counsel to any of the parties; or a relative,  
13 employee or independent contractor of the parties involved  
14 in the proceeding, or a person financially interested in  
15 the proceeding;

16 That I am not related to any of the parties to this  
17 action by blood or marriage, and that I am in no way  
18 interested in the outcome of this matter;

19 That the foregoing transcript, consisting of pages 1  
20 through 29 is a full, true and correct transcription of my  
21 stenotype notes of said deposition.

22 DATED: At Reno, Nevada this 17th day of July,  
23 2017.

24   
DEBORA L. CECERE, NV CCR #324, CA CSR #8821

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ERRATA SHEET

I declare under penalty of perjury that I have read the  
foregoing \_\_\_\_\_ pages of my testimony, taken  
on \_\_\_\_\_ (date) at  
\_\_\_\_\_(city), \_\_\_\_\_(state),  
and that the same is a true record of the testimony given  
by me at the time and place herein  
above set forth, with the following exceptions:

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23	Date:	_____	_____	_____
24				Signature of Witness
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25				Name Typed or Printed