

STATE OF OHIO)
) SS.
COUNTY OF ASHLAND)

COURT OF COMMON PLEAS

STEPHANIE SIKORA, et al.,

Plaintiffs,

vs.

ASHLAND UNIVERSITY,

Defendant.

CONFIDENTIAL

Case No. 17-CIV-006
Judge Forsthoefel

CONFIDENTIAL
DEPOSITION
OF
CARLOS A. CAMPO

TAKEN AT: Ashland University
638 Jefferson Street
Ashland, Ohio

DATE: Wednesday, October 10, 2018

TIME: 9:05 a.m.

REPORTER: Teri Genovese Mauro, RPR

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DEBORAH A. MYERS
CLERK OF COURTS
ASHLAND, OHIO

IN

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DEPOSITION OF CARLOS A. CAMPO

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11 By: **WILLIAM A. NOLAN**

12 **ALSO PRESENT:** Josh Hughes, Ashland University
13 Representative

14 **CARLOS A. CAMPO,**
15 was by me first duly sworn, hereinafter certified,
16 testified and said as follows:

17 **MS. MURRAY:** Good morning. My name
18 is Leslie Murray. We let briefly just
19 before this.

20 EXAMINATION

21 **BY MS. MURRAY:**

22 **Q** Could you start with your full name?

23 **A** Sure. It's Carlos Alejandro Campo. If I
24 say it with my father's accent, it rolls off the
25 tongue better.

MR. NOLAN: Sounds great.

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1 Q Are you a doctor?
2 A I am. PhD in English.
3 Q And you're currently the president of
4 Ashland University?
5 A That's right.
6 Q How would you like me to address you today?
7 A Carlos, please.
8 Q Okay. What is your home address?
9 A It's 1583 State Route 60, and it's in
10 Ashland.
11 Q What's the zip here?
12 A It's 44805.
13 Q How long have you been the president of
14 Ashland University?
15 A Just finished our third year.
16 Q And have you, the entire time you've been
17 employed by Ashland, been the president?
18 A Yes.
19 Q Have you ever previously been employed by
20 Ashland University?
21 A No.
22 Q Is that a no?
23 A No.
24 Q What did you do prior to being employed by
25 Ashland?

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1 Q What is the common core?
2 A Common core state standards are — were a
3 group of standards that were set for math and
4 English, in particular, for students of all grade
5 levels. And so for every grade level, these
6 standards have been established. And basically the
7 Obama Administration had incentivized certain states
8 to adopt these standards, and most did. Many more
9 than we had anticipated adopted the standards.
10 Q And so, just generally, did you start
11 programs to do this? Do you work with NGOs? How did
12 you go about —
13 A You know, for the most part, we worked with
14 Hispanic organizations across the country. It was
15 more an information campaign than anything else. We
16 wanted families to understand these are the new
17 standards, this is how it will affect your child, and
18 we helped those individual families actually kind of
19 do a self test for their student to ensure that they
20 were kind of studying at that level. Because we knew
21 that these standards for the most part — most of our
22 early research indicated that these new standards
23 would make it difficult for a lot of students to be
24 promoted to the next grade level in these areas if
25 they didn't study hard.

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1 A I have worked as a consultant for the Gates
2 Foundation, served as a president at Regent
3 University, chief academic officer both at Regent
4 University and at the College of Southern Nevada,
5 dean of arts and letters at the College of Southern
6 Nevada, department chair, faculty member, academic
7 advisor, valet parker, waiter. How far back do we
8 go?
9 Q So at Regent University, you were the
10 president?
11 A I was the president at Regent University
12 from 2010 through 2013, and I served as a chief
13 academic officer at Regent from 2008 till 2010. And
14 then previous to that, I was at the College of
15 Southern Nevada for years, both as a professor, dean,
16 and then chief academic officer.
17 Q The chief academic officer, that's the
18 administration, I assume?
19 A Yes. Even the dean is considered the
20 administrative post.
21 Q What did you do at Gates Foundation?
22 A I worked with them on helping Latino
23 families and students understand the common core
24 standards and its impact on overall academic
25 standards.

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1 Q So tell me if this is accurate.
2 A Sure.
3 Q My understanding is that students have to
4 meet certain standards —
5 A That's right.
6 Q — within the common core in order to
7 promote, and there are certain — especially grade
8 levels like Grade 3 —
9 A Yeah.
10 Q — where there's reading proficiency tests?
11 A Sure.
12 Q So is it true that you were working as a
13 consultant at the Gates Foundation to get the
14 information to Hispanic families to help promote
15 education so that their children could be successful?
16 A That's correct.
17 Q Okay. Was there any sort of financial or
18 economic component to what you were doing at the
19 Gates Foundation?
20 A Not sure I understand.
21 Q Outside of obviously you were getting paid,
22 but were you advising anyone on any financial or
23 economic issues when you were a consultant of the
24 Gates Foundation?
25 A I can't think of anything that was related

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1 to finance or economics per se, no. I mean, there
2 was obvious economic benefit for students to progress
3 through K through 12, so we certainly talked a lot
4 about the financial benefits of students being
5 promoted through each grade level. But --

6 Q But you didn't have any completely separate
7 function where you were trying to help organizations
8 on their budget concerns or anything like that?

9 A Not with Gates, no.

10 Q And then let's take a whole step back to the
11 beginning of your academic career.

12 A Okay.

13 Q So I understand from your testimony that
14 prior to your academic career, you had some odd jobs
15 like valet parking?

16 A Sure.

17 Q We could probably just brush over that.

18 A Okay.

19 Q What was your first, like, professional
20 employment?

21 A Well, let's see. I guess I would say it was
22 probably as a lecturer, so lecturer within the
23 department of English back in 1980s, maybe, 1988,
24 something like that. Maybe a little bit earlier.

25 As I began my doctoral work, it was typical

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1 Q What was your dissertation?

2 A It was on the playwright Arthur Miller, and
3 a classical look at friendship in his work.

4 Q And then where was your first employment
5 once you achieved your PhD?

6 A Well, I worked as a lecturer at UNLV for a
7 number of years, and I guess it was in the 2000s that
8 I actually transferred from UNLV to the College of
9 Southern Nevada and began teaching there as a faculty
10 member in the English department.

11 Fairly typical that once you achieve your
12 PhD at an institution, they want you to go out
13 somewhere else. It's -- I think they've used the
14 phrase academic incest. They kind of want you to go
15 out and take the ideas to other institutions. So
16 there really was, at that time, only one other school
17 in the Southern Nevada area, and that was the College
18 of Southern Nevada, much larger school, more attuned
19 to two-year programs than four-year programs, career
20 and technical education. But that's where I
21 transferred and actually got into a tenure track at
22 the College of Southern Nevada.

23 Q And what does tenure track mean?

24 A Tenure track means that you are hired into a
25 track, an academic track that would lead to tenure.

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12

1 that you would be -- you would have some posts like
2 that. I'm certain around that time I also worked as
3 an academic advisor.

4 Q Where did you do your doctoral work?

5 A At the University of Nevada in Las Vegas.

6 Q Where did you get your undergraduate degree?

7 A In theatre.

8 Q Is that a BA or --

9 A Yes.

10 Q Bachelor of fine arts?

11 A BA, bachelor of arts, theatre.

12 Q Where did you achieve that?

13 A UNLV. All of my degrees were from UNLV.

14 Q Did you get a master's degree on the way to
15 your PhD?

16 A Yes, master's of arts in English.

17 Q What year did you get your BA?

18 A '81, I think is right. '81, '86, and '93, I
19 think.

20 Q So master's degree in 1986?

21 A I think that's right.

22 Q And PhD from UNLV in 19 --

23 A 1993.

24 Q And what is your PhD in?

25 A English.

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1 Q And how would you define tenure generally in
2 the academic community?

3 A Well, I think tenure is understood as a
4 commitment from an institution to a faculty member
5 who has demonstrated levels of commitment to the
6 institution. It gives that faculty member a sense of
7 academic freedom and a sense of the institution's
8 commitment to them long term as well.

9 Q And when you say commitment from the
10 organization, the university, do you mean a
11 commitment to continue employment unless there's some
12 cause to terminate that --

13 A Yes.

14 Q -- employee?

15 A I think a tenured professor definitely has
16 the expectation that there will be continued
17 employment, yes.

18 Q And that's a reasonable expectation?

19 A Yes. Unless there are circumstances that
20 mitigate against that as you mentioned.

21 Q And is it true that generally in academic
22 organizations, there's some process if you -- if it's
23 time to terminate a tenured professor because there's
24 some causal reason to do so?

25 A Yes. I think there is generally a process.

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1 There's program elimination. I think that's probably
2 the most typical one where there's very little
3 process.

4 Q Or if there's some behavioral issue? If
5 there's —

6 A Oh, of course. If there is a crime
7 committed or something along — but even there,
8 there's some process, but it's fairly
9 straightforward.

10 Q And does that general definition of tenure,
11 is that a definition that Ashland University
12 subscribes to?

13 A You know, I don't — I don't know that there
14 is a universal definition of tenure. I think we talk
15 about an understanding about tenure. I think the
16 definition of tenure can vary, and sometimes
17 radically from institution to institution. But the
18 sentiment of tenure equaling an understanding of
19 continued employment, I would say that is fairly
20 uniform and certainly true at Ashland.

21 Q How is tenure — I mean, there is tenure at
22 Ashland?

23 A There is tenure at Ashland, that's right.

24 Q And what is Ashland's definition of tenure?

25 A You know, I don't know that there is a

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1 formal definition of tenure, but I think it is this
2 idea that we hire people into tenured positions and
3 expect from them a commitment to the mission of the
4 institution, to teaching and learning, to research,
5 to all the elements that you would expect from a
6 faculty member. And it's the idea of establishing a
7 culture at any institution and campus, and I think
8 tenure is a way, as we've said, to give that faculty
9 member the sense that you're part of this academic
10 community, that you can expect continued employment
11 under most circumstances, and that, in return, you
12 will give back to that institution and feel a sense
13 of freedom.

14 I think when you look at the history of
15 tenure, that's one of the things that's clear about
16 it is that there was a time, particularly in early
17 American institutions where professors often had
18 radical ideas. And that was very true, certainly, as
19 I was a young man growing up in that era. And I
20 think when you saw resurgence of tenure and the power
21 of tenure, it was around that so that any professor
22 could espouse an idea that was not contrary to the
23 mission of the institution or, you know, raising
24 revolt, but in an academic construct, I think you
25 want professors to have a sense that they can

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1 academically be free to express ideas openly without
2 fear of some sort of intervention on their job.

3 Q So if I understand you correctly, there's a
4 sort of give and take that the faculty member has
5 some obligations to the institution, and then the
6 institution has some obligations back to the faculty
7 to continue employment unless there's some set
8 procedure to remove?

9 A That's right. I think even at institutions
10 that have longstanding traditions of tenure, and
11 Ashland would be among them, post-tenure review is
12 very typical.

13 You know, I think one of the things that you
14 have heard about and read about in higher ed. is this
15 idea that a lot of folks work hard up until tenure,
16 and then they kind of coast from that point forward.
17 So I think that's probably a little bit overblown,
18 but I think that's one of the things you want to
19 protect against in any organization is that you
20 ensure that people are always working hard toward the
21 elements of industry teaching by the mission for the
22 institution.

23 Q And we talked about you being employed on
24 the tenure track at the University of —

25 A Yes.

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16

1 Q — Nevada — University —

2 A Yes. It was actually at the College of
3 Southern Nevada.

4 Q College of Southern Nevada?

5 A Uh-huh.

6 Q And then did you achieve tenure?

7 A Yes.

8 Q What year did you achieve tenure?

9 A It was in the 2000s. My wife would
10 remember. But I honestly don't recall. Probably
11 around 2003, maybe, somewhere like that.

12 Q And why did you say your wife would
13 remember?

14 A Well, because I think she understood it to
15 be an important milestone. You actually generally
16 can't use a term life professor if you're not tenured
17 into that track, free to using that term.

18 Q And that's a term of esteem?

19 A Sure.

20 Q What's your wife's name?

21 A Karen.

22 Q Karen Campo?

23 A Uh-huh.

24 Q How long have you been married?

25 A 38 years.

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1 Q Do you have children?

2 A We have three.

3 Q How old are they?

4 A 35, 33, and 31.

5 Q Grandchildren?

6 A Yes. Three. Identical twins who are two,

7 and then a one-year old.

8 Q Congratulations.

9 A Thank you. All boys.

10 Q Is that your only marriage? To Karen?

11 A Yes.

12 Q I assume you're still married?

13 A We are.

14 Q Does she reside with you at the State Route

15 6 —

16 A Yes. Yes.

17 Q Anybody else live with you?

18 A Our son, Brandon. Our eldest son, Brandon,

19 his wife, Madeline, and Parker are there. Parker's

20 our grandson. Karen's mother Clara also lives with

21 us. So we have four generations living under one

22 roof. Never a dull moment.

23 Q Busy household.

24 A Yes, for sure.

25 Q How would you describe the process of — the

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1 whole process before achieving tenure and then

2 achieving tenure? It's a significant amount of work

3 and —

4 A Yes.

5 Q — labor, and the labor of love?

6 A Uh-huh. It is. So the actual tenure

7 process, is that what you're referencing?

8 Q Yes.

9 A Yes. The tenure process at any institution

10 is, and it should be, rigorous. You're demonstrating

11 that the institution should make this commitment to

12 you as a faculty member. So, oh, yes, it's rigorous.

13 It is time consuming. It is. But it's legitimate

14 from my perspective.

15 I think if you look particularly at the full

16 professor, it's something that should be — I think

17 even the national standards today indicate that half

18 the people who are up for full professor don't

19 receive tenure. So I think it's one of those things

20 that should be rigorous, perhaps even more rigorous

21 than it is today, because it is quite a commitment.

22 Q Did you achieve full professor?

23 A Yes.

24 Q And that's an additional process beyond the

25 first step of achieving tenure, correct?

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1 A That's right.

2 Q And everything that you just described

3 relating to the achieving tenure process and full

4 professor process was true for you, correct?

5 A That's right.

6 Q Is that also true for the process at Ashland

7 University?

8 A Yes. Ashland, while a different process,

9 does have a clear process and a rigorous process for

10 achieving the different levels of professor.

11 Q I think you know that we're here today

12 because six tenured professors have filed a lawsuit

13 against Ashland University?

14 A Right.

15 Q And so was the process of achieving tenure

16 for those individuals equally rigorous as we've just

17 described?

18 A You know, I would assume that. I don't

19 know. All of the folks of whom you speak were

20 tenured long before I got here, so I really — I'm

21 not sure. I never served as chief academic officer

22 here at Ashland, so I don't really know intimately

23 what those elements are, but of course I reviewed the

24 materials and I know it's rigorous.

25 Q So you don't have any specific knowledge —

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1 A Right.

2 Q — of their particular tenured process,

3 correct?

4 A That's right.

5 Q But as far as you know, as president of the

6 university —

7 A Yes.

8 Q — you're comfortable with the standards and

9 you believe that they're rigorous —

10 A Yes.

11 Q — and maybe not identical to the process

12 you went through, but at least similar?

13 A Yes.

14 Q Do you remember around the time or the

15 specific year that you achieved full professor?

16 A Again, I do believe it was around 2003, but

17 I could be —

18 Q Give or take a few years?

19 A Yeah. Right.

20 Q And you said you had started at the College

21 of Southern Nevada in what year?

22 A Could have been the late '90s, around 2000,

23 something like that.

24 Q It took a number of years to achieve —

25 A It did.

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1 Q — tenure?

2 A Yes.

3 Q And a lot of hours?

4 A Yes.

5 Q Then I assume you continued to work hard
6 after you achieved tenure, but would you agree that
7 that milestone is something of value in and of
8 itself?

9 A Yes.

10 Q So you served as a teaching professor at
11 College of Southern Nevada from sometime in the late
12 '90s through approximately what year did you become
13 an administrator?

14 A Good question. If I think that through, I
15 think probably by 2005 I began as an interim dean of
16 arts and letters. I believe that's the right time
17 line. Sounds right.

18 Q And you served as a department chair when
19 you were teaching as a professor; is that correct?

20 A No. I actually — yes. But this is going
21 back many years. I actually think I was a lecturer
22 when I served as a department chair, and that was at
23 a private college in Las Vegas back in — gosh, that
24 really goes back. That could be, oh, late '80s,
25 early '90s, but I went from a tenured professor

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1 position at College of Southern Nevada, CSN, in
2 2000 — so in 2005 from English prof. to interim
3 dean. Served in that role for two years and then one
4 year as the chief academic officer.

5 Q Is College of Southern Nevada a public or
6 private institution?

7 A Public.

8 Q What was the name of the private college in
9 Las Vegas?

10 A Dove College.

11 Q Other than Ashland University and Dove
12 College, have you been employed by any other private
13 universities?

14 A Not as a — only as a consultant.

15 Q What period did you do that consulting work?

16 A Oh, probably over a period of 15 years or
17 so. I've consulted at a number of private colleges,
18 particularly around helping those campuses be more
19 welcoming for minority students in the system,
20 minority students to be retained at a higher level
21 and graduate at a higher level.

22 Q So did you do the consulting work at the
23 same time that you were employed —

24 A Yes.

25 Q — as a professor and administrator in

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1 colleges?

2 A That's right. That's right.

3 MR. NOLAN: Just a friendly
4 reminder. Make sure you let her finish
5 her question —

6 THE WITNESS: I'm sorry.

7 MR. NOLAN: — and then you answer.

8 She will be much happier.

9 Q Make Teri's life a lot easier.

10 A Poor Teri.

11 Q Did you ever do any consulting work at any
12 other private institutions or universities or
13 colleges around budgetary concerns or financial
14 issues?

15 A No, I don't believe so.

16 Q And you served — the highest position you
17 served at the College of Southern Nevada, the dean of
18 arts and letters?

19 A No. I served as the chief academic officer
20 for one year as well.

21 Q And who does that position report to?
22 Who's —

23 A The president.

24 Q The president. And then from the College of
25 Southern Nevada, did you — were you hired by

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24

1 Regent's University?

2 A Yes. Regent with a single T. Regent
3 University.

4 Q And where is that located?

5 A In Virginia Beach, Virginia.

6 Q Did you live in Nevada the entire time prior
7 to moving to Virginia?

8 A Yes.

9 Q And was your first position at Regent
10 University president?

11 A Chief academic officer.

12 Q What year was that?

13 A 2008.

14 Q So did you serve as the chief academic
15 officer at Regent University from 2008 to 2010?

16 A Yes.

17 Q And then president of Regent University from
18 2010 to 2013?

19 A '13, yes.

20 Q And what did you do after 2013?

21 A Consulted for the Gates Foundation.

22 Q Is Regent University a private or public?

23 A It's private.

24 Q Does Regent University have tenure?

25 A Yes.

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1 Q Is it consistent with the tenure process
2 that we've been talking about today?

3 A No.

4 Q What is different at Regent University with
5 tenure?

6 A Their tenure process does include a
7 provision that allows for length of tenure review
8 differences. So you can have a post-tenure review of
9 one year or three years. The length of time it takes
10 to get tenure is a bit different, but there is a year
11 or two difference as well.

12 And because Regent is primarily a graduate
13 institution, the gradations of professors are a bit
14 different; hence, the overall rigor for tenure, I
15 would say, it's probably a little bit magnified
16 because of the graduate nature of the work.

17 Q It's more difficult?

18 A Yes.

19 Q So I think you've described, when I asked
20 you to define tenure in the first place, more that it
21 was a sentiment. Is the sentiment of there is an
22 obligation by the institution and an obligation of
23 the employee seeking tenure and then eventually
24 achieving tenure, is that the same at Regent as it
25 would be generally?

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1 A I think generally, yes.

2 Q Was there any change to the tenure process
3 or the view of tenure while you were at Regent?

4 A No, I don't think so.

5 Q Were there any tenured professors that were
6 terminated or non-renewed while you were at Regent?

7 A I don't think so. I'm trying to recall. I
8 honestly don't recall.

9 Q If there was one or two, would it have been
10 for cause?

11 A It would have been for a cause, yes.

12 Q In other words, was there — there was no,
13 sort of, general layoff —

14 A No.

15 Q — where a large number of — or even a
16 small handful of tenured professors were let go?

17 A No, I don't recall that.

18 Q Did Regent have any financial or budgetary
19 issues while you were there?

20 A Yes.

21 Q Is that true of most private universities
22 and colleges?

23 A Yes.

24 Q And I should put a time frame on that. In
25 this present time frame?

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1 A Right, particularly around those years.

2 Uh-huh. 2008 is when I started there so —

3 Q That was when we were in a major financial
4 recession —

5 A Yes.

6 Q — in this country, right?

7 A Right.

8 Q What did you — did you take any major
9 actions to help deal with those budgetary concerns?

10 A Yes. Our team did work hard to help
11 establish some ways to improve the financial
12 condition of the institution. Regent was far more
13 endowment driven than Ashland, has a fairly
14 significant endowment, 250 million or so when I
15 started there.

16 And when you think about the fact that
17 endowment assets declined somewhere in the
18 neighborhood of 30 to 40 percent, there were
19 significant reductions that were required as a result
20 of the financial downturn.

21 Q And so did you have to cut expenditures?

22 A We did.

23 Q What did you cut?

24 A We cut things like travel. We cut staff
25 positions. We may have even cut some faculty

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1 positions, but not tenured faculty. I think every
2 institution realizes that you try to make every cut
3 possible before you touch any faculty members, and we
4 did so. We also just did some overall belt
5 tightening across the board.

6 We asked institution — we asked individual
7 departments to identify a certain percentage, and I
8 want to say probably somewhere around 10 to
9 15 percent cuts across the board, and to prioritize
10 those. Then we had a process whereby we would review
11 those cuts and then approve them.

12 Q Was there a faculty senate at Regent?

13 A No — I shouldn't say that. Yes, there was.
14 It was not a formal — as formal as it is here at
15 Ashland, but there was, yes.

16 Q Were there faculty rules and regulations at
17 Regent?

18 A No. No.

19 Q Was there any kind of procedure that was
20 incorporated into the contracts of the professors at
21 Regent?

22 A There's certainly contracts for professors.
23 I don't know about procedures.

24 Q You understand that there are rules and
25 regulations at Ashland University?

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1 A Sure.

2 Q And you agree that the rules and regulations
3 are incorporated into the contract of each tenured
4 faculty professor?

5 A I don't know about the incorporation. I do
6 know that there are contracts for faculty members,
7 and I do know that there is a document called the
8 FRR, yes.

9 Q As the president of Ashland University, is
10 it your position that the university is obligated to
11 abide by the rules and regulations, faculty rules and
12 regulations?

13 A Yes. Yes.

14 Q Are you aware of a settlement agreement in,
15 I think, 1976 between Ashland University and the
16 faculty?

17 A I know that there was such an agreement,
18 yes.

19 Q Have you ever looked at that agreement?

20 A Not in detail, no.

21 (Whereupon, Exhibit 96 was marked for
22 identification.)

23 Q So I've handed you what's been marked as
24 Exhibit 96. At the top, it reads: Settlement
25 agreement, Case Number 8CA — I believe it's 13450.

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1 Do you see that?

2 A Yes, I see that.

3 Q If you can, can you identify this as the
4 settlement agreement between Ashland University and
5 the faculty?

6 A No, I cannot.

7 Q That's just because you aren't familiar with
8 it?

9 A Right. Actually it's not with Ashland
10 University. It says Ashland College here.

11 Q Is it your understanding that Ashland
12 College is the predecessor to Ashland University?

13 A Yes. Yes. Actually the name has changed
14 three times in its history. Ashland University — it
15 was Ashland College, then Ashland University, then
16 Ashland College. Actually four times.

17 Q They're all the same institution?

18 A No, but yes. They're quite different.
19 Sorry. But no, quite different institutions, and
20 those name changes were very significant. And they
21 are in higher education. Essentially differences
22 between colleges and universities.

23 Q Could you just briefly walk me through that
24 time line and your understanding?

25 A Sure. In 1878, the Ashland College was

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1 established as a college. And then in 1911,
2 I believe, the name was changed to Ashland
3 University.

4 One of the things that is distinctive about
5 Ashland University is even from its founding, it has
6 always been seen as a more comprehensive school than
7 simply a liberal arts college. And so that
8 distinction, I think, has always followed Ashland.
9 Even when it was a college, it was a college that was
10 primarily producing professionals in the fields of
11 education and religion.

12 So it was a fairly distinctive difference
13 between Ashland and other colleges that would be
14 producing people with liberal arts degrees and not
15 necessarily attuned to the professions.

16 So when it did change again to Ashland
17 University in the '80s, 1980s, that was a reflection
18 of this longstanding tradition of it's committed to
19 the professional schools.

20 Q We had issued some discovery requests in
21 this case.

22 A Okay.

23 Q Did you participate at all in gathering
24 documents or answering any of the responses?

25 A I know that a request was made of me about

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1 e-mails, and we certainly provided everything that we
2 had that was requested.

3 Q In anticipation of your deposition today or
4 any other time in this litigation, without disclosing
5 any conversations or communications you've had with
6 your attorneys, what documents have you reviewed to
7 prepare for today?

8 A You know, I — not many. I — my feeling is
9 that I have a fairly good recollection of what we
10 have been through over these last two years,
11 particularly around the action that was taken. So I
12 know that I looked at documents referencing my
13 communication, because I thought that was important.
14 The communication that came forward from our office,
15 I certainly reviewed that document, but not really a
16 lot else.

17 Q Would you agree that as — do you have any
18 reason to dispute that Ashland University is
19 obligated to the terms of this settlement agreement
20 that's in Exhibit 96?

21 A I honestly have not read through this
22 document, so I can't speak to that particularly. I
23 believe that Ashland University has and continues to
24 be committed to do all that we can to adhere to
25 faculty rules and regulations, and we've been very

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1 consistent in that commitment and that every action
2 that we have taken is a reflection of our commitment
3 to FRR.

4 MS. MURRAY: Can we go off record a
5 second.

6 (Whereupon, a discussion was held off
7 the record.)

8 MS. MURRAY: Okay.

9 BY MS. MURRAY:

10 Q If you just turn to the last page.

11 A Are they numbered?

12 Q Actually, not the last page. It's numbered
13 at the bottom. It says AU, a series of 0s, and then
14 2590. So it's a few pages from the back. There are
15 signatures there. Do you happen to know who the
16 president of the college was at the time?

17 A It looks like Joseph Shultz. I know he was
18 a president here. Is there a date missing? Is there
19 a date here? I'm not seeing a date.

20 Q The signature is not dated. I'm not sure if
21 there's one contained in the agreement. On the
22 second page, if that helps you, 2585, in the first
23 paragraph, it says that the agreement can be revoked
24 by February 15th, 1980.

25 A Okay.

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1 Q It was probably in that time frame.

2 A Uh-huh.

3 Q But if I understand your testimony, you're
4 not overly familiar with this document, but you
5 understand there's a settlement agreement and that
6 Ashland University is obliged to comply with it?

7 MR. NOLAN: I object. You can go
8 ahead.

9 A I can say with some certainty I've never
10 seen this document. And, again, our obligation to
11 comply, I couldn't even know that without reading the
12 document so —

13 Q Okay.

14 A As a matter of fact, if I'm reading this
15 right, it's indicating that the effectiveness of the
16 agreement is contingent upon its ratification by the
17 AAUP, approval by the college board of trustees or
18 its executive committee, and approval by the regional
19 director.

20 Q Do you have knowledge if that happened?

21 A No.

22 Q So as you sit here today as president of the
23 university, you don't refer to this as a document
24 that you have an understanding you need to be
25 obligated to?

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1 A Right.

2 Q And then I think I've asked you this, but I
3 just want to make sure my time line is correct. So
4 from — 2013 you left Regent?

5 A Right.

6 Q And why did you leave Regent?

7 A You know, it was clear that the board and I
8 were moving in different directions. And so —

9 Q Was your departure voluntary?

10 A Yes.

11 Q You resigned?

12 A Yes.

13 Q Was it at the end of a contractual term?

14 A No.

15 Q What direction was the board going in that
16 you disagreed with?

17 A You know, I just think it was a different
18 direction.

19 Q Can you give me some context?

20 A There's really nothing else to say.

21 Q Did you receive any severance when you left?

22 A Yes. I was under contract.

23 Q Did they pay out the rest of your contract?

24 A That's — honestly, those are all terms that
25 are not publicly —

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1 Q You have a confidentiality agreement?

2 A I do.

3 Q Was there any litigation filed?

4 A No.

5 Q Did you have an attorney help you with those
6 negotiations?

7 A Some.

8 Q What are his or her name?

9 A I'm not — I'm limited.

10 MR. NOLAN: Yeah, I'm going — I
11 don't know that he needs to disclose the
12 names of his attorney in something
13 unrelated to this case.

14 Q Well, can we just agree that there is a —
15 some kind of document that reflects the terms, and
16 you're not at liberty under those terms to share it
17 now?

18 MR. NOLAN: I think he's testified
19 to that.

20 A (Witness nodded.)

21 Q Yes?

22 A I've testified to that.

23 Q Who was the president of the board at the
24 time at Regent?

25 A Vern Clark.

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Q You say Vern?

A Vern was the chairman — no, that's not right. He was the chairman of the finance committee. Danny Sellers was the chairman of the board. S-E-L-L-E-R-S.

Q Thank you.

And were you working as a consultant at the Gates Foundation from 2013 until you were hired by Ashland University?

A Yes. And continue to be.

Q You continue to do consulting work for Gates Foundation?

A Yes.

Q Was that a full-time position before you were working at Ashland?

A (Witness nodded.)

Q Is that a yes?

A Yes.

Q How did you decide to apply for the position at Ashland?

A A search consultant contacted me about the position and encouraged me to apply.

Q Had you engaged any kind of head hunter or search consultant prior to that?

A No.

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Q Was it the search consultant that Ashland University had hired?

A I don't believe so. I'm not sure about that. I don't know those details.

Q Do you remember who it was?

A I know that the person who contacted me was Paul Corts, C-O-R-T-S.

Q Do you know who his employer was?

A I believe it's the Association of Governing Boards, AGB, but I will say that I am not certain that he reached out to me on a professional level. I know him as a friend, and so I think it was more of a personal contact than I'm calling on behalf — he did not call to say I'm calling on behalf of the association or even on Ashland University.

It was more we were talking, and he said, you know, there's a position at Ashland you should probably take a look at, something like that.

Q Okay. And then what did you do from there?

A I asked him where it was, and he said it's Northeast Ohio, and I said I'm not interested.

Q Because of the weather?

A You know, that really was not a fair evaluation, but I'm sure the weather had something to do with it. We just didn't have family here, had no

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real history in Ohio. Just it didn't feel — just from that limited information, you know —

Q And then I assume at some point you did apply for the position?

A We did. Yes. As a matter of fact, that same person, I happened to run into him. We had lunch together in DC talking about other issues, and he asked if I — again, asked if I looked at Ashland. And after his renewed encouragement, he just felt there would be an alignment between my history and past and Ashland's mission that I should take a look. So, yes, I did apply after that.

Q When did you apply?

A I applied sometime in the early part of 2000 — let's see, that must have been 2015, so I know that probably maybe March or even February — no — yes, probably just after the first of the year as I think about it. So maybe even earlier, maybe even in January.

The announcement was made in the first of April. I remember that for certain. And I know that I had been reviewing documents and the history of the institution, certainly, at least a month or two before that. So I want to say certainly by February '15 I had applied.

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Q What was the search process like?

A It was fairly typical for these kinds of positions. It included an array of information that I had to submit in advance and follow-up interviews, some by phone and some face to face. Some here in Ashland, some in Columbus. There were public fora that were involved, a number of constituent groups that we met with.

Q I assume you were interviewed by the board?

A Yes.

Q Were you interviewed by a small committee? How did that work?

A Yes. We had opportunity to speak to a smaller committee. There was a larger committee as well. The search committee itself that was assembled that was part of the process was rather large. It was a pretty big group. Included faculty, included staff, board members, alums, maybe even a student rep.

Q What were the major concerns that were raised by university representatives that they communicated to you in that process prior to hiring you?

A You know, I think the primary — I don't know if they were really concerns. I think what the

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1 board laid out was the future direction of the
2 institution, how important it would be for the new
3 president to establish direction for the institution.

4 There's no question that there had been a
5 lot of change at Ashland before I came. And part of
6 what the board hoped was that the new president would
7 be able to come and bring some stability to the
8 campus culture and environment.

9 Q What kind of changes before you came?

10 A There were administrative changes. There
11 were fiscal changes. There had been — well, there
12 was an interim president in place when I applied for
13 the position, so there had been a change of president
14 to an interim person. There was a president who had
15 previously been in that role who moved to a
16 chancellor's role or some other kind of consultative
17 role. There had been a number of layoffs, staff
18 layoffs, some faculty.

19 Q The faculty prior to you becoming president
20 were all non-tenured faculty?

21 A I think that's right.

22 Q And the interim president was President
23 Crothers, correct?

24 A Yes.

25 Q Did you know him personally prior to your —

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1 A No.

2 Q Let me just finish.

3 A I'm sorry.

4 Q — prior to your interaction with Ashland
5 University?

6 A No. We knew of each other, and we may have
7 met, but we — we weren't friends. As a matter of
8 fact, I wouldn't know that I would have been able to
9 pick him out of a lineup per se.

10 Q Did you have any kind of hand-over with
11 President Crothers?

12 A Yes. We actually worked together very
13 closely. He stayed on in kind of a formal role as
14 mentor and advisor to help with the transition for a
15 number of months, maybe up to a year.

16 Q I understand the announcement was made
17 April 1st. When did you — when was it communicated
18 to you that you were hired by Ashland?

19 A Very soon before that. I'd say certainly no
20 more than two weeks previously. And it could have
21 been less than that, maybe even just a week
22 intervening. They were quite anxious to make an
23 announcement.

24 Q Do you have an understanding of who you were
25 competing against for the role?

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1 A I knew one of the other finalists, yes. He
2 worked at Regent University, so I knew him pretty
3 well.

4 Q That's ironic.

5 A It really was.

6 Q What was his position there?

7 A He was the chief academic officer, provost.

8 Q And had he subsequently left Regent, or was
9 he still there?

10 A He was still there.

11 Q So prior to April 1st, in the search process
12 prior to your hiring, were there challenges that the
13 representatives from the university identified and
14 brought to your attention that you were going to have
15 to face if you were hired?

16 A Yes.

17 Q What were those challenges?

18 A There were a number of challenges. The
19 transition of which I spoke, cultural shifts. The
20 institution had also initiated a prioritization
21 process. So part of the challenge was to continue
22 that process forward. There were clearly significant
23 fiscal issues with the institution, but moreover,
24 there was a lack of focus. I think that was probably
25 the greatest message I received from the board was

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1 we've lost our way; we're not sure what our future
2 direction should be; we need someone to take us
3 there.

4 Q What were the fiscal issues that were
5 raised?

6 A I think the fiscal issues that were raised
7 was the board was concerned, as they were completing
8 the prioritization process, that the strategic
9 priorities for the institution were unfunded and
10 perhaps unfundable because the budget had been
11 allocated in such a fashion that there were not
12 discretionary dollars available to fund strategy
13 priorities for the institution.

14 Q Did you meet with Steve Storck in your
15 hiring process?

16 A I don't know that we had a separate meeting.
17 I certainly probably met him somewhere along —

18 Q You don't have any distinct recollection of
19 a meeting with him?

20 A No.

21 Q What were these budgetary constraints that
22 made no discretionary dollars available?

23 A Well, I think the committee that had been
24 working on prioritization realized that there were a
25 number of areas. The idea that we were lagging far

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1 behind our peer for online education. The fact that
2 even programs that were established and doing well at
3 Ashland were underfunded. The fact that overall, if
4 you look at the balance and the weight of how dollars
5 were allocated, the cuts that had been made previous
6 to my coming were made in staff areas and pretty
7 much — and most institutions would handle it in this
8 fashion — the easy cuts had been made, so all of the
9 cuts that were made previous to my coming, if you
10 looked across the board, they cohered generally
11 around staff, around programs.

12 They did all — you know, they reduced
13 contributions to retirement. They basically cut
14 raises, so there hadn't been raises in years and
15 years. So, you know, the institution had done belt
16 tightening and cutting in a number of areas, but it
17 was quite clear that there wasn't a process.

18 So when the — when I say there wasn't a
19 process, the formal process of restructuring that
20 began with a prioritization really was that
21 initiative.

22 I think the board — and this may have been
23 previous to Dr. Crothers coming, but in reviewing
24 materials and my early discussions with the board, it
25 became clear that they realized they had to intervene

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1 and help an institution that was struggling.

2 So that process really revealed those
3 issues. And even in my early meetings with
4 Dr. Crothers and with the board, it became clear that
5 the prioritization process needed to move forward and
6 reallocation of funds had to occur.

7 Q And was it in that process that you
8 understood there would be a need to non-renew some
9 tenured professors?

10 A Yes. Somewhere along the lines we knew
11 that. But it wasn't ever a discussion of tenured
12 versus non-tenured. It was really a question of
13 where will the cuts come. And when we realized that
14 they would come out of the faculty ranks, and then
15 the depth of the cuts that would have to be made or
16 the reallocation, we understood at some point, yes,
17 that tenured faculty would be part of that, yes.

18 Q When you say there was a formal
19 restructuring that occurred, can you describe what
20 you mean by that?

21 A Oh, my goodness. As I reviewed the
22 documents and people involved, I was incredibly
23 impressed by the depth to which Ashland University
24 had initiated this formal process through —
25 primarily through this prioritization process, and

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1 this wasn't just academics. This was across the
2 board. So athletics, auxiliary, every area was
3 closely examined. I mean, committees met weekly.
4 There were more than 50 people involved in the
5 process; board members, staff, faculty.

6 I read hundreds of pages of minutes and
7 other documents that this group had worked on. I've
8 been in higher ed. my entire adult career, and I've
9 never seen an institution take on such a formal
10 process toward identifying areas of strength and
11 areas of restructuring that were needed. It was a
12 remarkable process.

13 Q So I've reviewed all the prioritization
14 reports —

15 A Oh, my goodness.

16 Q — and process.

17 A Wow.

18 Q I assume you have as well?

19 A I have.

20 Q And so that process happened prior to you
21 being hired; is that right?

22 A Part of that process. So, you know, it's
23 clear, as I say, that when I came in April, that
24 process continued. And so — but a lot of it had
25 been completed, yes.

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1 Q So it's my understanding that the academic
2 prioritization process report was delivered to the
3 board in the May 2015 board meeting. Does that sound
4 right?

5 A That sounds right.

6 Q So the announcement that you were hired was
7 April 1st of 2015; is that correct?

8 A Right.

9 Q And then a month or so later, that
10 prioritization report was delivered to the board?

11 A Right.

12 Q And that prioritization process that
13 resulted in that report, that took most of that
14 academic year, correct?

15 A Right. If you — if you say — maybe even
16 more than the academic year, right. So depending on
17 when it started, it could have even preceded
18 September.

19 Q In April of 2015, there was a communication
20 by the administration to all faculty and staff saying
21 that this process was ongoing. Are you familiar with
22 that?

23 A Yes.

24 Q And that there were going to be no major
25 changes immediately. And when you came on, was that

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1 your understanding of how the university's
2 position —
3 A No. I don't remember anything communicated
4 to me about no changes immediately, no.
5 Q So when you came on on April 1st —
6 A Right.
7 Q — what was your understanding of what
8 needed to happen in the immediate future prior to the
9 start of the next academic year?
10 A You know, I don't know that there was a
11 directive regarding what needed to happen prior to
12 the academic year. There was tremendous urgency
13 around moving forward regarding prioritization.
14 Q When you came on, was there also a debt
15 restructuring issue that was happening?
16 A Yes.
17 Q Did Steve Storck spearhead that process?
18 A I think that's fair to say.
19 Q Did you participate in it?
20 A Yes.
21 Q Generally there was some debt issues the
22 university had; is that correct?
23 A Yes. Yes.
24 Q And that debt was restructured into a bond?
25 A Yes.

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1 Q Were you familiar with those documents?
2 A It's more than a bond. Right. There are a
3 number of bonds, but I'm somewhat familiar with that
4 process, yes.
5 Q And there were bond covenants as a part of
6 those bonds?
7 A Yes.
8 Q Were part of those bond covenants to reduce
9 the expenditures of the university?
10 A No.
11 Q Usually there's some kind of ratios, you
12 know, budgetary ratios. Are you familiar with any of
13 those in the bond covenants?
14 A The covenants don't include ratios as far as
15 I know. There are bond covenants, and they certainly
16 can be tied to some ratios, and there are and have
17 been established ratios in higher ed. in terms of
18 cash flow and those kinds of things, but there's
19 nothing in our covenant that makes specific reference
20 to ratio.
21 Q Were there any ratios that Ashland was
22 required to meet prior to that debt restructuring?
23 A No.
24 Q As far as you're aware, was there any
25 requirement from any loans or other bank covenants

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1 that you had that you needed to operate at? Does
2 your budget have to be in the red or in the black?
3 Did you have any understanding of that?
4 A I'm not exactly sure I understand your
5 question. But I — I'm not sure I understand what
6 you're asking.
7 Q So prior to this debt restructuring, was
8 there any kind of operating loan that you had with
9 any banks?
10 A Yes.
11 Q Were there bank covenants on that loan
12 requiring you to operate to have a balanced budget
13 basically?
14 A No.
15 Q No?
16 A No.
17 Q Was there anything in the bond covenants in
18 this period that you received these new bonds in
19 the — it was in the summer of 2015?
20 A It wasn't completed until after that time
21 essentially. After the — it was actually after the
22 fall that that was actually finalized, but they were
23 in discussion, certainly, in the summer.
24 Q Were there any — were the terms of those
25 covenants, were there any changes the university

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1 needed to make —
2 A No.
3 Q — to meet —
4 A Sorry.
5 Q — the bond covenants?
6 A I'm not letting you finish. Apologize.
7 No.
8 Q There's been some testimony from board
9 members and other representatives at Ashland, other
10 employees at Ashland, that there was this bond
11 covenant; the covenants did require some fiscal
12 changes. You're not aware of any?
13 MR. NOLAN: I'm just going to
14 object to the characterization of the
15 testimony. You can go ahead and answer.
16 A Okay. No, I'm not aware of any. And just
17 in general terms, a bondholder is making an objective
18 evaluation of an institution whether or not they're
19 worth investing in. Right? They're representing a
20 number of investors, and so I think they would expect
21 particular fiscal practices. But the idea that the
22 bond — that a bondholder would require changes, that
23 would be incorrect. If that's — if that's what I'm
24 understanding you asking.
25 I would say that a bondholder cannot require

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1 a change. They can certainly impose something in
2 particular, and there are certain covenants that you
3 speak of that are in place, but the idea that a —
4 that the board was required or the institution was
5 required to make a fiscal change by a bondholder, I'd
6 be unaware of that.

7 Q Was there a need to cut expenditures so that
8 the books were acceptable to the people giving the
9 bond — the institutions giving the bond?

10 A No.

11 MS. MURRAY: Let's take a break for
12 a minute.

13 (Whereupon, a recess was taken at
14 10:10 a.m. and resumed at 10:20 a.m.)

15 (Whereupon, Exhibits 97 through 103
16 were marked for identification.)

17 Q So we started talking about bond issues just
18 before we broke, and I'm not — I have a stack of
19 bond documents here. I'm not going to ask you to
20 give me a whole financial lesson on them, but I do
21 want to see if we can just identify them so that we
22 have them as a part of the record.

23 A Okay.

24 Q So if you could — if you can do that, I'd
25 appreciate it. So I'm going to hand you what's been

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1 A It's the amount that was restructured as
2 part of these bonds.

3 Q I guess my question is is that the whole
4 amount, or is there some other piece that I'm
5 missing?

6 A I'm not sure what you're asking. Are you
7 saying is this the total debt of the university?

8 Q I'm asking if this is the total
9 restructuring amount.

10 A This — this is the total amount of bonds
11 that were part of this agreement.

12 Q Okay. Now I'm going to hand you what's been
13 marked as Exhibit 98.

14 MR. NOLAN: Just put them here.
15 Give you some room.

16 THE WITNESS: Thanks.

17 Q Exhibit 98 is —

18 A Uh-huh.

19 Q — also an exhibit with many pages, but it
20 starts with AU 5315. Do you see that?

21 A I see 5315.

22 Q Yes?

23 A Yes.

24 Q This is entitled: The trust indenture by
25 and between the Economic Development and Finance

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1 marked as Exhibit 97. It's AU 5177.

2 MR. NOLAN: Just for the record,
3 you mean the first page?

4 MS. MURRAY: The first page. It's
5 a many-page document.

6 Q It says: New issue, book entry only. And
7 then in bold towards the top of the page, it says:
8 67,355,000. Do you see that?

9 A I do.

10 Q Is this part of the bond that you were
11 talking about?

12 A This is a part of — it looks to me to be
13 part of the bond restructuring that occurred in my
14 first year as president here at Ashland.

15 Q And this document, the bottom of the first
16 page says: Dated July 23rd, 2015. Do you see that?

17 A I do.

18 Q Okay. And you would agree that this process
19 was happening around that time?

20 A Yes.

21 Q Did you see this document at the time?

22 A I don't know. I don't believe so.

23 Q Is the 67,355,000, is that the total amount
24 of the debt restructuring that occurred in this
25 period?

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1 Alliance of Tuscawaras County and the US Bank
2 National Association as bond trustee. Do you see
3 that?

4 A I do.

5 Q And it's dated August 1st, 2015?

6 A Yes.

7 Q And it has the same number, relating to the
8 issuance of the authority, 67,355,000?

9 A Uh-huh.

10 Q Is that a yes?

11 A Yes.

12 Q Is this part of the bond documents of the
13 debt restructuring?

14 A These are part of the bond documents, yes.

15 Q And this bond was issued, and the university
16 is obligated by the terms in these documents,
17 correct?

18 A That's correct.

19 Q Now I'm going to hand you what's been marked
20 as Exhibit 99.

21 A Okay.

22 Q Exhibit 99 is a multi-page exhibit that
23 begins on AU 5404. If you look on the first page, I
24 actually printed these two to a page.

25 A Okay.

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1 Q Try to be sustainable.

2 MR. NOLAN: Let the record reflect
3 that Miss Murray is being sustainable.
4 Stipulated.

5 Q And actually going back to Exhibit 98, the
6 first page of Exhibit 98 is 5314, because it's also
7 printed two to a page.

8 A Document 98.

9 Q You see that?

10 A Okay.

11 Q Would you agree that Exhibit 98 is entitled:
12 Loan agreement by and between Economic Development
13 and Finance Alliance of Tuscarawas County?

14 A That's 99 or 98?

15 Q It's 99.

16 A Yeah, you just said 98. I just wanted —

17 Q Oh, I'm sorry. Exhibit 99, Tuscarawas
18 County and Ashland University dated August 1st, 2015,
19 relating to the issuance of the authority of the
20 \$67,355,000?

21 A Yes.

22 Q And this, again, is part of the bond
23 documents for the debt restructuring in the summer of
24 2015; is that correct?

25 A Right. That was part of why these were

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1 issued.

2 Q I'm going to hand you what's been marked as
3 Exhibit 100.

4 A Okay.

5 Q Exhibit 100, again, is a multi-page exhibit
6 printed two to a page, front and back, and it starts
7 with AU 5426.

8 A Uh-huh.

9 Q Do you see that?

10 A I do.

11 Q And this Exhibit 100 is a master trust
12 indenture between Ashland University —

13 A Uh-huh.

14 Q — and US Bank National Association as
15 master trustee; is that correct?

16 A Yes.

17 Q And it's dated August 1st, 2015 —

18 A Right.

19 Q — is that correct?

20 A Yes.

21 Q Would you agree that this was — these bonds
22 were issued on or around August 1st, 2015?

23 A Around that time, yes.

24 Q I'm going to hand you what's been marked as
25 Exhibit 101. Exhibit 101 is a multi-page document

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1 starting at AU 5496 entitled: First supplemental
2 master indenture dated as of August 1st, 2015. It's
3 a supplemental to the master trust indenture dated
4 August 1st, 2015, between Ashland University and the
5 US Bank National Association as master trustee. Do
6 you see that?

7 A I do.

8 Q You would agree that this is part of the
9 bond documentation for the bonds that were issued on
10 or around August 1st, 2015, for the debt
11 restructuring at Ashland University?

12 A I guess the only issue, you continue to say
13 "for the debt restructuring at Ashland University."
14 These bonds included that element, but they also
15 included, as is outlined here, the idea of
16 reinvestment in the institution.

17 So some of the dollars from this agreement
18 went into reinvestment into the infrastructure of the
19 institution as well.

20 Q Okay. So let me just make sure I understand
21 that testimony.

22 A Sure.

23 Q So part of the issuance of this bond was to
24 restructure some debt obligations the university had?

25 A That's correct, part of it.

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1 Q And there was a need to do that because of
2 either interest rates were going up or something was
3 coming due; is that correct?

4 A I think it would be better to say — or more
5 correct to say that the institution believed that by
6 consolidating much of that debt and issuing these
7 bonds, they would overall reduce our debt obligation
8 and be able to reinvest some dollars into improving
9 the infrastructure of the institution.

10 Q And so when you say reinvest dollars, does
11 that mean that there was no money available for
12 Ashland to utilize as a part of this issuance of this
13 bond?

14 A Yes. That there was some money available
15 for capital improvement in this bond issuance as
16 well. It was directed only to that. It couldn't be
17 used for other purposes.

18 Q So the additional funds that were available
19 for Ashland to use couldn't be used to pay any
20 operating salaries, anything like that?

21 A Could only be used for capital.

22 Q Going to hand you what's been marked as
23 Exhibit 102. Exhibit 102 is a multi-page exhibit
24 beginning on AU 5518. Do you see that?

25 A Yes.

****CONFIDENTIAL****

1 Q And it's an open-end mortgage of real
2 property, security agreement of personal property,
3 and assignment of rent and profits. Did I read that
4 correctly?

5 A Yes.

6 Q You would agree that this mortgage is a part
7 of the bond issuance transaction that occurred on or
8 around August 1st, 2015?

9 MR. NOLAN: If you can answer.

10 A I — I'm not sure.

11 Q Okay. You would agree that this is dated
12 the 3rd of August, 2015? If you look at the first
13 paragraph.

14 A Yes, I see that.

15 Q And it's between US Bank National
16 Association as master trustee under the master trust
17 indenture. Do you see that in the first paragraph?

18 A I do.

19 Q Do you have any reason to believe this isn't
20 a part of the transaction that we've been talking
21 about?

22 A I'm trying to make that connection. I'm not
23 seeing a direct connection.

24 Q If you don't know, you don't know. That's
25 fine. You don't know?

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1 (Whereupon, Exhibit 104 was marked
2 for identification.)

3 Q You've just been handed what's been marked
4 as Exhibit 104. It's entitled: The regular meeting
5 of board of trustees of Ashland University, May 7th,
6 2015. Do you see that?

7 A Yes.

8 Q I know your hiring was announced April 1st,
9 but when did you begin employment at Ashland
10 University?

11 A On June 1st of 2015.

12 Q Did you attend this May board meeting?

13 A Yes.

14 MS. MURRAY: Actually, let's mark
15 this one.

16 (Whereupon, Exhibit 105 was marked
17 for identification.)

18 Q I've also handed you Exhibit 105. It's
19 Bates stamped AU, several 0s, 2971. Do you see that?

20 A Yes.

21 Q And it's entitled: Regular meeting of the
22 board of trustees, Ashland University, May 8th, 2015.
23 Were there two separate board meetings two days in a
24 row?

25 A I don't know that they were separate. I'm

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1 A I don't know. I don't know based on what
2 I've seen so far. I'm not sure.

3 Q I'm going to hand you what's been marked as
4 Exhibit 103. Exhibit 103 is entitled: Continuing
5 disclosure agreement. And if you look, it's dated
6 July 1st, 2015. The first paragraph, it says: By
7 Ashland University and US Bank National Association,
8 and it's in connection with the issuance of a
9 67,355,000 aggregate principal amount of the Economic
10 Development and Finance Alliance of Tuscawaras
11 County, higher education facilities, refunding, and
12 improvement revenue bonds. Do you see that?

13 A Yes.

14 Q Would you agree that this document is part
15 of the documents for the bond that was issued in or
16 around August 1st, 2015?

17 A Yes.

18 Q It's your position that Ashland University
19 did not take any action changing any budgetary items
20 or operating expenses in connection with the issuance
21 of these bonds?

22 A That's correct.

23 MR. NOLAN: Done with these,
24 Leslie, or —

25 MS. MURRAY: Yes. Uh-huh.

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1 just looking here to see if they were separate or if
2 this was part of — the board generally meets —
3 they're here this week, so they'll be here for
4 Wednesday night, Thursday, Friday, so it's a
5 three-day. So I'm assuming that this was the same,
6 but I don't know.

7 Q Okay. So that explains a lot to me.

8 A Okay.

9 Q The board meets over a period of days?

10 A Period of days, that's right.

11 Q So when we talk about the May 2015 board
12 meeting, we would be referring to —

13 A Several days' worth of meetings.

14 Q Okay. So the Exhibit 104 would reflect the
15 minutes from the May 2015 board meeting that occurred
16 on May 7th, and Exhibit 105 would reflect the minutes
17 from the continued May 2015 board meeting but what
18 occurred on May 8th, 2015; is that correct?

19 A I believe that's correct.

20 Q And you attended the whole of the May of
21 2015 board meeting?

22 A I attended much of that meeting.

23 Q Was there executive session that you did not
24 attend?

25 A I would not have attended an executive

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1 session.

2 Q Do you know if there was an executive

3 session?

4 A I don't know.

5 Q Is there any part of the meeting that you

6 know specifically that you did not attend?

7 A No.

8 Q Was the prioritization reports delivered to

9 the board in these meetings?

10 A Were they distributed to the board during

11 these meetings? I believe that part of them would

12 have been distributed.

13 Q Was there a presentation about the

14 prioritization process at these meetings?

15 A I don't recall.

16 Q When is the first time that you saw the

17 prioritization reports?

18 A I saw them certainly before April 1st.

19 Q Did you see them in draft form?

20 A Yeah.

21 Q Is that yes?

22 A Yes.

23 Q Did you participate in the drafting or any

24 finalization of the reports?

25 A Before — at any time?

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1 decision was a corporate decision. A number of

2 people were involved.

3 Q So let's make sure we're getting all those

4 component parts. So what do you mean by a "corporate

5 decision"?

6 A So I mean more than one person was involved.

7 Q And who was that?

8 A The board of trustees.

9 Q I understand there's 39 members of the

10 board?

11 A I believe there were at the time that we're

12 discussing.

13 Q I assume that not all 39 board members were

14 active participants in the deliberation of making

15 this decision; is that correct?

16 A I don't think that is correct. I think they

17 were all active participants.

18 Q Did you recommend the decision not to renew?

19 A No. That — the decision not to renew was

20 part of the process. So that, in particular, would

21 not have been my recommendation or anyone's

22 recommendation.

23 Q When you said "part of the process," are you

24 saying that it's part of the prioritization process?

25 A Part of the restructuring process. So

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1 Q At any time.

2 A No.

3 Q So what was the purpose of your review when

4 you saw them in draft form?

5 A I was about to be the president of the

6 institution, so it was information.

7 Q They weren't asking for input from you?

8 A No, not formally.

9 Q Who were you mostly in contact with as it

10 related to the prioritization process prior to your

11 official hire in late March of 2015?

12 A I don't think it was limited to one person,

13 but I had exchanges with Dr. Crothers and also with

14 the board chair, Lisa Miller.

15 Q Was there anyone else on the board that

16 was — who you had significant contact with in this

17 process prior to April 1st, 2015?

18 A No.

19 Q Was it your decision to non-renew the

20 tenured faculty?

21 A No.

22 Q Who made that decision?

23 A Well, there was a decision made to implement

24 the elements of prioritization that would have

25 included the non-renewal of tenured faculty, but that

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1 formal restructuring, prioritization was part of

2 that.

3 Q And when did this formal restructuring

4 begin?

5 A It began before I came to Ashland, and I

6 would suggest probably maybe going back to 2014.

7 Q So I didn't bring the minutes from 2014

8 because you were not employed at that time —

9 A Right.

10 Q — but if I represent to you that the

11 prioritization process started in the academic year

12 of 2014, does that sound right to you?

13 A It's possible. I have to review to be sure,

14 but I would suggest that the formal process went back

15 to an open discussion between the board and the

16 administration about change that had to happen at

17 Ashland.

18 Q Was — did that process begin with the

19 change of President Finks from president to

20 chancellor?

21 A I think those were — they happened around

22 the same time. I don't know the direct relationship

23 between all of those elements.

24 MR. NOLAN: Off the record.

25 (Whereupon, a discussion was held off

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the record.)

MR. NOLAN: Go back on.

BY MS. MURRAY:

Q So at some time in this decision to do a prioritization process, Ashland University's position that that was part of what you call formal restructuring?

A Yes.

Q And that process was begun by a board action; is that correct?

A I believe, yes, that the board was centrally involved in the prioritization process and initiated that review.

Q Are you familiar with the book on prioritization —

A Yes.

Q — and universities by Dickeson, I believe?

A Yes.

Q Did you have familiarity with that book prior to coming to Ashland?

A Yes.

Q Is that sort of —

A It is well known in higher education as a resource for institutions to review.

Q Was that the framework in which the board

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wanted the restructuring to occur?

A I think they used it as a reference and a guide, yes.

Q Do you know Dickeson?

A I think we've met.

Q Did he come to campus in your time here?

A No.

Q So you didn't have any specific conversations about the formal restructuring at Ashland with Dickeson?

A That's correct.

Q Are you aware of board members that did?

A No.

Q You're not aware of any dinner any board members had with Dickeson?

A (Witness shook head.)

Q Is that a no?

A No. No.

Q You would agree that the board decided to restructure sometime in 2014 prior to your arrival, correct?

A Sounds right.

Q And would you agree that in the board's decision to restructure, they were determining at that time that there would be some non-renewals of

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tenured professors?

A No.

Q At what point did — would you agree that it was the board's decision to non-renew the tenured professors?

A No.

Q Who determined to non-renew the tenured professors?

A Well, I guess the way I would frame it, just to try to be as precise as possible, that the board approved the implementation of a restructuring process that would ultimately include the non-renewal of faculty, some tenured, some untenured, some staff, some programmatic review. This was a comprehensive action that included that element. I guess that would be a more precise way to say it.

Q I want to drill down on just the part of the process. I understand that you're looking at it as a whole process, but I need to focus on the decision to non-renew the tenured faculty.

A All right.

Q You agree that occurred?

A It did occur, yes.

Q And generally who made the determination that the non-renewal of tenured faculty should occur?

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A Well, I would say that the board approved the administration's recommendation to move forward with the restructuring process, and that included the non-renewal of faculty contracts, some tenured, some non-tenured.

Q And at what point was the — so I understand that there — you're looking at this in a really holistic fashion?

A Yes.

Q But there are component parts to what you're talking about?

A Sure.

Q At what point was the component to non-renew tenured faculty included in what you're describing?

A That's a great question. I guess in my head it was about reallocating dollars, and so the discreet kinds of questions and points you're making probably weren't exactly stated in that fashion. So in other words, we realized at some point that faculty reductions would have to take place because of the overall reduction that would have to happen. The whole reallocation.

If you look across the board at the institution, we had a 9-to-1 faculty ratio. That's one of the things that would jump out to any higher

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1 ed. professional. A 9-to-1 faculty to student ratio
2 is a wonderful academic model, but a very difficult
3 fiscal model to sustain long term. So that's just
4 one example as you look at the overall restructuring
5 process.

6 So I think as the review continued, I mean,
7 this is months and months in the planning and review,
8 it became clear that there would be reductions to the
9 faculty ranks. But, again, this idea that, gosh, on
10 what day did someone sit down and say we know that
11 there will be faculty, and who approved it, and were
12 there tenured, non-tenured — as a matter of fact, I
13 don't believe there was even a discussion of tenured
14 versus non-tenured.

15 In every discussion, I will say this, we
16 held what is a long-held belief, and that is you do
17 everything you can to make every cut possible at an
18 institution before you cut tenured faculty, so I
19 will — I will say that.

20 Q Okay. Going all the way back, when you said
21 9-to-1 ratio, that's nine students to one faculty
22 correct?

23 A That's correct.

24 Q When you say it became clear there would be
25 reductions, did you participate in making that

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1 decision?

2 A Yes.

3 Q And I understand that the prioritization
4 process had people from the department looking at
5 their specific department to see what changes could
6 be made; is that right?

7 A Yes. Particularly those departments that
8 had already been identified as those under a
9 restructure, a formal restructuring that had been
10 designated as such.

11 Q Okay. Who identified those departments?

12 A That was part of the formal prioritization
13 process. And so the committee members who would be
14 on those individual committees, and in this case,
15 those academic committees would have identified
16 those.

17 Q And was that done by administration?

18 A It's actually — the committees were not
19 just administrative committees. There were a number
20 of people on those committees. And that was prior to
21 my coming.

22 Q Okay. So when you say there was no real
23 discussion about tenured verse non-tenured —

24 A No.

25 Q — so the prioritization committee was

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1 looking to see what was best for the university?

2 A Yes.

3 Q And in that process, they made
4 recommendations to make some changes?

5 A Yes. To enhance certain programs, continue
6 certain programs, and restructure certain programs —

7 Q And —

8 A — or areas.

9 Q And if the program was identified or area
10 was identified as restructure, that's when someone
11 went in to say, okay, we may have to eliminate some
12 positions here?

13 A Yes.

14 Q Okay. And you're saying in that process, no
15 one looked to see if it was a tenured verse
16 non-tenured?

17 A Not — not at — in other words, they didn't
18 look at that element per se, just restructure.

19 Q So in — some of my clients had in their
20 departments people that were non-tenured that
21 maintained their position.

22 A (Witness nodded.)

23 Q That's consistent with your testimony today,
24 correct?

25 A Uh-huh. Yes.

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1 Q And then some of my clients had adjunct
2 professors teaching their courses?

3 A Uh-huh.

4 Q Is that consistent with your knowledge of
5 what's happened?

6 A Honestly, I wouldn't have that specific
7 granular knowledge, but it's possible. And not all
8 of those courses, I'm sure.

9 Q But if that was true, that would be
10 consistent with the process, is that —

11 A I don't think that would be inconsistent
12 necessarily.

13 Q That was a double negative. So let me make
14 sure we will be able to read this transcript later
15 and make it make sense.

16 A Okay. Sure.

17 Q So if the university is employing adjunct
18 professors to teach the courses that the plaintiff —
19 that some of the plaintiffs had taught previously,
20 you're not aware of any inconsistency with the
21 prioritization process and the decision to non-renew;
22 is that correct?

23 A Yes.

24 MR. NOLAN: I'm going to object to
25 the form.

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1 A Right. It's a hypothetical question.
2 I believe you said "if." If that were true, I would
3 deem that not inappropriate or at odds with the
4 process.

5 Q Okay. You don't have specific knowledge
6 that adjuncts are teaching those courses?

7 A Correct.

8 Q But you don't have any reason to dispute
9 that either?

10 A I would suggest that it would almost be
11 impossible to equate the specific courses being
12 taught by professors in 2015, any professor in 2015,
13 the courses currently offered at Ashland, those that
14 are taught by adjuncts, and making one-to-one
15 comparison between those that are taught today at
16 Ashland and those that were taught in 2015 by any
17 faculty member.

18 Q And why is that?

19 A Because of the inherent nature of
20 fluctuation change in any schedule of classes being
21 taught. It would be almost impossible to make that
22 time — one-to-one correlation.

23 Q Let's look at like a music department.

24 A Right.

25 Q So Professor Sikora is a voice professor?

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1 A Uh-huh.

2 Q Are you aware of that?

3 A No, I didn't know that.

4 Q Okay. She was a professor of voice.

5 A Okay.

6 Q And she taught individual voice courses.

7 A Right.

8 Q You would agree that there is some
9 consistency in a professor teaching one-on-one voice,
10 whether it's in 2015 or 2018?

11 A Yes.

12 Q I just want to go back to try to get a time
13 line on what's happened. So you're hired in
14 April 1st?

15 A Yes.

16 Q At that point, are you aware that there will
17 be reductions in tenured faculty?

18 A No.

19 Q When the report from the prioritization
20 process is delivered to the board in the May of 2015
21 board meeting, are you aware that there will be a
22 reduction in tenured faculty?

23 A I would say even at that point, no.

24 Q And then you start June 1st, 2015?

25 A Right.

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1 Q Did you come to campus then?

2 A Yes, on or about.

3 Q Okay. When did your family move here?

4 A My wife came later. I want to say in July.

5 Q Did you find a house right away?

6 A We found a house, but not one that we owned.

7 Q Do you remember, did you move prior to
8 June 1st? Around June 1st? When did you move here?

9 A Around June 1st.

10 Q And then from the documents that — it's
11 sort of quiet in June and July of 2015. Did anything
12 happen that you remember in that period related to
13 the non-renewal of the tenured faculty?

14 A Well, I can tell you that we spent hours and
15 hours and hours reviewing the overall process of
16 reallocation.

17 Q Was it in that time frame?

18 A Certainly.

19 Q Okay. And who is the "we" that you're
20 talking about?

21 A Well, I think certainly the entire
22 administrative team was reviewing elements of
23 prioritization. We were reviewing the documents that
24 came forward from the May board meeting. We were
25 thinking already about strategic planning for the

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1 future. As a matter of fact, we had certainly some
2 strategic planning, initial strategic planning
3 meetings over that summer. So it involved quite a
4 few folks.

5 Q Was it the deans of the different schools?

6 A Deans would have been involved, sure, and
7 had been involved.

8 Q Other administration members?

9 A Sure. Doug Fiore was the provost at the
10 time. He would have been involved.

11 Q Storck?

12 A Probably not so much. He certainly would be
13 providing financial information as needed, but from a
14 strategic perspective, this is much more people in a
15 particular program, areas.

16 Q Most professors were not on campus in the
17 June and July of 2015?

18 A I'm not sure. I wouldn't think so.

19 Q Were you here?

20 A I was here, yes. But I'm here right now,
21 and I wouldn't have any idea who's on campus or not.

22 Q Campus is generally quieter in the summer;
23 is that correct?

24 A No, it's not, really. We have a lot of
25 programs going on in the summertime. We do a lot of

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1 camps, so it's really quite vibrant and active.

2 Q Were there any faculty members on the team
3 that was working on this reallocation process in June
4 and July of 2015?

5 A I don't know that there were faculty members
6 involved in the prioritization process who were on
7 campus at that time and continuing to review, but
8 there may have been.

9 Q Did you understand that your marching orders
10 from the May 2015 board meeting was to implement the
11 prioritization report?

12 A It was to move forward with the analysis and
13 action, yes.

14 Q And did your work in June and July of 2015
15 with your team, your administration team — is that
16 fair?

17 A Uh-huh, that's fair.

18 Q — result in the recommendation to the board
19 to non-renew some tenured faculty?

20 A The work that I did in June and July with my
21 team and individually moved forward with the
22 implementation of the prioritization process.

23 Q Is that a yes?

24 A It's my answer to your question.

25 Q So I just want to make sure we're

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1 connecting. So —

2 A I guess where we're not connecting is you
3 seem to imply that we took an action or did a
4 deliberation regarding non-renewal of tenured or
5 non-tenured faculty. That wasn't the case.

6 In other words, we did a review of the
7 entire allocation of budget. We analyzed the
8 prioritization process. We reviewed a number of
9 other documents that led to a restructuring, formal
10 restructuring ongoing process at the university that
11 resulted in a number of changes, including the ones
12 you reflect.

13 But it seems as though you're implying that
14 there was some kind of action that moved toward
15 elimination of faculty, but that's not the case. The
16 case is that the elimination of faculty was part of a
17 much broader process.

18 Q Well, you'd agree that some action had to be
19 taken for the elimination of the tenured faculty?

20 A Right.

21 Q It didn't just happen spontaneously?

22 A No.

23 Q So — and you would agree that it's an
24 unusual step to non-renew tenured faculty?

25 A It is.

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1 Q Was there some deliberation about whether
2 that was a reasonable step at least?

3 A Yes.

4 Q Were you part of contemplating that there
5 would be an elimination of tenured faculty?

6 A Yes.

7 Q And did you make the recommendation that
8 that should occur?

9 A No.

10 Q Who initiated this idea that you were going
11 to eliminate tenured faculty?

12 A Well, and, again, that discussion never
13 happened. So no one ever said: On Day X, let's
14 eliminate tenured faculty.

15 It became clear through the process that
16 when faculty reductions would happen that some of
17 these faculty would inevitably be tenured faculty.
18 But those specific decisions were made much later and
19 by a specific committee that had been set up to
20 execute that process.

21 Q So that's — are you referring to the
22 special committee that was appointed after the
23 August 2015 meeting?

24 A Right.

25 Q Okay. So prior to that committee, it's your

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1 testimony that there was no decision that it had to
2 be tenured faculty?

3 A That's correct.

4 Q Were you — did you participate in putting
5 together the special committee in August of 2015?

6 A No.

7 Q Who did that?

8 A I believe — I know it was chaired by the
9 provost, and I believe that he constituted that
10 committee.

11 Q Do you understand that in the rules and
12 regulations, if you're going to non-renew tenured
13 faculty, you must first attempt to look at
14 non-tenured faculty first?

15 A Yes.

16 Q You agree with that?

17 A Yes.

18 Q When the task was given to the special
19 committee to implement the board's decision in August
20 of 2015, were there orders given to the special
21 committee to look first to terminate non-tenured
22 faculty?

23 A I didn't give those directions. They may
24 have been given, but I'm not aware of that.

25 Q You didn't do anything to ensure that those

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1 directions were given?

2 A I was not part of that process.

3 Q You were the president of the university at
4 the time, correct?

5 A That's correct.

6 Q And you didn't do anything specifically to
7 ensure that the special committee looked to see if
8 there were other non-tenured faculty before
9 determining that tenured faculty should be
10 terminated?

11 A I was not involved in the work of the
12 special committee. I wasn't on the committee, not in
13 the process, not even outlined in the process.

14 Q I understand that. But I just need to know
15 for the record, to make sure it's clear, that you
16 took no action to ensure that the special committee
17 should look to non-tenured faculty for termination
18 prior to tenured faculty?

19 A Took no action. I would say, yes, I took no
20 action.

21 Q And it would be Fiore that was tasked with
22 putting the special committee together?

23 A I believe that's right.

24 Q Do you know if he sat on the committee?

25 A He chaired the committee.

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1 Q He chaired the committee. Okay. So he
2 formed the committee and then was hands on in the
3 deliberations; would that be fair?

4 A I think so. I was not involved.

5 Q That would be your expectation?

6 A My understanding.

7 Q Okay. So just going back in time a minute
8 to the June and July of 2015 period when you're on
9 campus working with your team on what you described
10 as the reallocation process. Is that — did I
11 characterize that correctly?

12 A Restructure.

13 Q What came out of all of that work that you
14 just described?

15 A Quite a bit.

16 Q You said that my focus on the non-renewal of
17 the tenured faculty was just, you know, one piece of
18 this broader restructuring. Is that — that's fair?

19 A That's fair.

20 Q Okay. What else happened in the
21 restructuring?

22 A Well, the restructuring identified strategic
23 priorities of the institution. And so one of the
24 primary goals of the entire process was to identify
25 areas that could be enhanced that could help sustain

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1 the institution's fiscal model long term.

2 So I would suggest that while we have been
3 discussing reduction quite a bit this morning, our
4 focus was really on how can we fuel the future of the
5 institution through investment, reinvestment, and
6 reallocation.

7 Q Okay. And when we're talking about
8 reallocation, I just want to make sure I understand.
9 So what we're saying is that you had to take funds
10 away from certain areas to spend them in other areas?

11 A Yes.

12 Q And one of the ways you did that was by
13 cutting some staff, some non-tenured faculty and some
14 tenured faculty —

15 A Yes.

16 Q — to use those funds for other things?

17 A Yes.

18 Q Was one of those things giving the remaining
19 faculty a raise?

20 A Yes.

21 Q And the decision on specifically who to
22 terminate occurred in this period between the
23 August 2015 board meeting and the communication in
24 mid August to the plaintiffs and the other
25 non-renewed faculty; is that correct?

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1 MR. NOLAN: I'm just going to
2 object to the form. Go ahead and
3 answer.

4 A Yes.

5 Q So it was a matter of days?

6 A Could have been many days, but yes.

7 Q It wasn't months? In other words, it was a
8 short time period? It was a number of days?

9 A It was — it was the number of days it was.
10 It could have been months. I don't know.

11 Q Let's do this.

12 A Sorry.

13 (Whereupon, Exhibit 106 was marked
14 for identification.)

15 Q I'm handing you what's been marked as
16 Exhibit 106. This is the regular meeting of the
17 board of trustees of Ashland University August 5th,
18 2015, and it's entitled executive session. Do you
19 see that?

20 A Yes.

21 Q And it's AU 5558, 5559, 55560. Do you see
22 that?

23 A Uh-huh.

24 Q Did you attend this meeting?

25 A Oh, yes.

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1 Q And was this the meeting that the board
2 determined what non — sorry.

3 Is this the meeting that the board made the
4 decision to non-renew tenured faculty?

5 A This is the — this is the meeting where the
6 board authorized the administration to formally
7 restructure academic programs.

8 Q And did that include a decision to non-renew
9 tenured faculty?

10 A We knew it would include that result, yes.

11 Q Why did you know that?

12 A Because it became clear that to
13 restructure — formally restructure academic programs
14 and reallocate that amount of money that there would
15 have to be reductions to include faculty that may be
16 tenure.

17 Q When you say formal restructuring, did you
18 mean that programs and departments would be combined
19 or cut? What constitutes formal restructuring?

20 A I think formal restructuring is defined by
21 the approach to the process. So if it's bona fide,
22 if it's intense, if its rationale is clear, if the
23 analysis and adjudication is part of the process,
24 then it's formal, and I would suggest that that was
25 true of what occurred.

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1 Q Would you agree that there should be some
2 change to the structure if you're restructuring
3 something?

4 A Yes.

5 Q Simply laying off or non-renewing
6 individuals isn't restructuring; would you agree with
7 that?

8 A No.

9 Q You wouldn't agree or you —

10 A I would not agree.

11 Q So it's your position that as long as
12 there's a rigorous analysis about why a tenured
13 faculty should not be renewed that that constitutes
14 formal restructuring?

15 A It is my position that a formal
16 restructuring that includes those other elements that
17 I described that could lead to the non-renewal of
18 tenured and non-tenured faculty is a formal — is
19 part of the formal process, yes.

20 Q What are the other elements that you are
21 referring to?

22 A Careful adjudication, formal analysis,
23 objective review of materials, certain time frame,
24 rigorous analysis. All of these are elements of a
25 formal restructuring.

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1 Q And so let me make sure I understand. So
2 it's your position that as long as there's a process
3 in place where the institution goes through the
4 elements that you just listed that there does not
5 need to be any change in the structure of the
6 organization itself to be a formal restructuring?

7 MR. NOLAN: Object to the form.

8 You can go ahead.

9 A Yes.

10 Q So when the board decided to go through this
11 strategic review and prioritization process, in your
12 view, it's the depth of the analysis and the
13 deliberation adjudication process that constituted a
14 restructuring?

15 A I believe that the entire process was
16 clearly a — was part of a formal review and
17 restructuring process, yes.

18 Q And it's important to you that it's
19 defined — it constitutes a formal restructuring
20 because that's the trigger word in the rules and
21 regulations that allows you to non-renew tenured
22 faculty; is that correct?

23 A No.

24 Q Generally the university's obligated to
25 continue employment of tenured faculty, correct?

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1 A Yes.

2 Q What is your position as to why you think it
3 was allowable to non-renew the plaintiffs in this
4 case?

5 A Well, I think it is clear that because this
6 action was part of a formal restructuring process
7 that it was allowable under the language in the
8 faculty rules and regulations.

9 Q Let me make sure we're understanding each
10 other. So you understand that in the faculty rules
11 and regulations there is —

12 A Is a provision.

13 Q — there's a provision —

14 MR. NOLAN: Let her finish.

15 Q — that allows the university to non-renew
16 tenured faculty under certain conditions; is that
17 correct?

18 A Yes.

19 Q One of those conditions is financial
20 exigency?

21 A Yes.

22 Q It is not — you're not taking the position
23 that you non-renewed them because of financial
24 exigency; is that correct?

25 A Would you please repeat the question?

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1 There's a double negative there.
2 Q Financial exigency is not the reason why you
3 think you're allowed to non-renew tenured faculty in
4 this instance, correct?
5 A Correct.
6 Q Is it your position that you were allowed to
7 non-renew the tenured faculty in this instance
8 because there was a formal restructuring that
9 occurred?
10 A Yes.
11 Q You would agree that it's important to the
12 university's position that the decision to non-renew
13 these tenured faculty is a part of a formal
14 restructuring?
15 A Yes.
16 Q And the university, when it constituted the
17 special committee, did not look to see if there was
18 any way to save those tenured faculty positions?
19 A The university reviewed a number of options
20 before constituting that committee. I guess I can
21 say that. No university would eliminate any faculty
22 positions willy-nilly. It would have to be, I hope,
23 part of the process.
24 I will say at Ashland University, it was
25 part of the most rigorous formal and comprehensive

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1 Q The elimination of a department.
2 A I think that the prioritization process
3 could have included the elimination of a program,
4 yes.
5 Q So my question is a little bit different
6 than that. So the — I want to talk about the
7 definition of restructuring.
8 If a program is eliminated, would that
9 constitute restructuring under the rules and regs?
10 A I think it could be interpreted as such.
11 Q And I think it would be reasonable if a
12 university eliminated an entire department that you
13 would then be allowed to have some non-renewal of
14 contracts if you didn't have that department any
15 more; you agree with that?
16 A Yes. I think that there are provisions for
17 eliminating or non-renewing faculty if the program is
18 eliminated, yes.
19 Q And is it your understanding that's the
20 restructuring provision?
21 A No.
22 Q What provision is that?
23 A I think there is a separate provision that
24 allows for the elimination of a program.
25 MR. NOLAN: Can I just note for the

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1 process I've ever witnessed in higher education. I
2 would defy any group to bring forward another process
3 that was as formal and comprehensive as ours.
4 Q And that's — when you're saying that
5 process, you're talking about the prioritization
6 process?
7 A I'm saying that's the cornerstone. But
8 there were — it was the entire process that included
9 prioritization as well.
10 Q Can you identify any structural changes that
11 occurred as part of the process?
12 A Oh, a myriad. It was hundreds of changes as
13 part of that process.
14 Q Any structural changes to the music
15 department?
16 A Any structural changes to the music
17 department? I'm not sure what you mean by that. I
18 honestly don't know what that means.
19 Q You would agree that if they eliminated the
20 music department, you would be allowed, under the
21 rules and regulations, to non-renew tenured faculty?
22 A Yes.
23 Q Would you say that that's under the
24 restructuring provision of non-renewal?
25 A What is?

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1 record while you're grabbing something.
2 Exhibit 106 and others are marked
3 confidential under protective order. So
4 if we end up transcribing this
5 deposition, we'll probably want to talk
6 about how we're working that testimony
7 about it.
8 MS. MURRAY: Yeah, that's fine.
9 MR. NOLAN: Thank you.
10 Q I think the rules and regs might be at the
11 bottom of that box, so we'll come back to it.
12 A Oh, okay.
13 Q So as you sit here today, can you identify
14 any changes to the structure of the organization of
15 any of the programs or departments that the
16 plaintiffs were professors of?
17 A I'm reviewing in my head the — those
18 particular departments. I can say for certain that
19 in the years, in the — since 2015, since that action
20 was taken and the continuing restructuring process
21 has occurred, there have been a number of
22 institutional — significant institutional changes.
23 Q What are those?
24 A They would include new program development.
25 They would include co-academic processes. They would

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1 include raises for two of the three years that we
2 have — two of the three intervening years. They
3 would include funding positions and institutional
4 effectiveness; assessment for the institution. Even
5 include investing in athletics at the institution;
6 other staffing that reflects the enhanced areas, so
7 online education, significant investment in online
8 education, significant investment in correctional
9 education.

10 All of these are part and parcel to the
11 formal restructuring process that was intended as —
12 for incipient stages to ensure the fiscal vibrancy of
13 the institution to move forward.

14 Q Okay. So just to make sure I understand,
15 you're saying that the reallocation of funds from
16 employing the tenured faculty and other cuts that
17 were made to the items that you've just listed —

18 A And many others.

19 Q — and many others is what you would
20 describe as a restructuring?

21 A Absolutely. As part of the formal
22 restructuring process, yes.

23 Q And as part of that decision to non-renew
24 the plaintiffs in this case and the other tenured
25 faculty, you didn't do anything personally to ensure

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1 that the — that there was an effort to non-renew
2 non-tenured faculty instead of the tenured faculty,
3 correct?

4 A As an institution, we then and continue to
5 emphasize the importance of our commitment to tenured
6 and non-tenured faculty. So if you're asking if I
7 took a formal action, I would say no, took no formal
8 action.

9 Q Would you agree that the university had an
10 obligation to rehire the tenured faculty if there was
11 a vacancy equivalent to that position?

12 A Yes. Depending on the circumstances, yes.
13 As a matter of fact, I can think of one particular
14 example where, because of our strategic plan, we had
15 a pillar that included a commitment to wellness, and
16 there was a faculty member who had been impacted by
17 the non-renewals who was a pretty good fit for that
18 area. I know that's one that we definitely
19 discussed, and I had a hand in bringing back a
20 faculty member who had been impacted to lead that
21 wellness effort. And I think that was part of our
22 ongoing commitment to faculty.

23 As a matter of fact, I know for certain I
24 had a number of meetings. We formally reminded deans
25 and others at cabinet meetings, if you have any

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1 opportunity to bring back these people, if there is
2 growth in these areas, please put that forward so
3 that we can review it. And we have been able to
4 bring back a number of faculty members.

5 Q Who decided the number of professors to
6 non-renew?

7 A You know, I'm not sure that a single person
8 defined that. I know that the 15 percent, somewhere
9 along the lines that the — a percentage was
10 identified, so the exact number probably was not
11 necessarily discussed. It was more a percentage
12 within the faculty ranks.

13 Q Was it 15 percent of the salary or
14 15 percent of the bodies?

15 A No, it was budgetary. It was a dollar
16 figure.

17 Q So is it accurate to say that in the June
18 and July 2015 process, your team determined that
19 there needed to be a 15 percent reduction in salaries
20 at the faculty level?

21 A 15 percent reduction in the budget
22 allocation for faculty, yes. It would be more than
23 just salary, but yes.

24 Q So that includes — when you say "budget
25 allocation," that includes all the benefits and

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1 pension contributions, health care, all that stuff?

2 A Pretty much everything is rolled up.

3 Q Are long-term tenured faculty more expensive
4 than newer faculty?

5 A No. As a matter of fact, it's one of the
6 things you often find is that because of changes in
7 the marketplace and the — just nature of
8 departments, it would vary from department to
9 department. You could actually hire a new faculty
10 member at a rate that could be higher than even
11 someone that have been here for some period of time.

12 Q So that would be based on negotiation of the
13 person?

14 A It can be. It can be related to market
15 changes, as I say. There are a number of other
16 issues that may affect that.

17 Q But would you agree that tenured faculty are
18 more expensive than adjuncts?

19 A You know, I would say that's generally true.

20 Q Adjuncts are typically part-time, correct?

21 A Yes.

22 Q And they don't get the benefits that a
23 tenured professor would get?

24 A Generally not. They can get some benefits
25 depending on the institution.

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1 Q Generally speaking, one way to reduce the
2 budget allocation for faculty would be to reduce
3 tenured professors and replace the — replace them
4 with adjunct professors?

5 A Yes.

6 Q And that, in fact, occurred in this
7 instance?

8 A No. I don't know that that's what occurred.
9 Because the faculty — student/faculty ratio and the
10 overall schedule of hours and the number of classes
11 we were running with under 10 students was such that
12 we probably didn't have to hire, in other words, not
13 a 1-to-1. It's not as though we eliminated someone
14 and have to hire someone upon a 1-to-1 basis. As a
15 matter of fact, you couldn't do that, because an
16 adjunct faculty member couldn't teach all of the
17 classes of a full load anyhow.

18 Q Maybe you misunderstood my question. In
19 some instances, adjunct professors were hired to
20 teach the courses that the tenured professors were
21 previously teaching?

22 A I would say to teach some of those courses,
23 yes.

24 Q So do I understand this correctly, the
25 special committee that was formed with Dr. Fiore as

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1 departments. I know the deans and department chairs
2 were essentially involved because they knew what the
3 needs were within the specific areas.

4 MR. NOLAN: Are you all right?

5 THE WITNESS: I'm okay.

6 MS. MURRAY: Are you okay? You
7 want a break?

8 THE WITNESS: No, I'm fine.

9 Thanks.

10 (Whereupon, Exhibit 107 was marked
11 for identification.)

12 Q Exhibit 107 is entitled non-renewed tenure
13 faculty. Do you see that?

14 A Yes.

15 Q Have you seen this document before?

16 A I think I have.

17 Q Do you know what it is?

18 A It looks like a review of the full-time
19 faculty in different areas.

20 Q And then on the left-hand column is a list
21 of some of the non-renewed tenured faculty. Do you
22 see that?

23 A I do.

24 Q Was this a document that was used in the
25 special committee, or do you know when this document

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1 the chair in August of 2015 was tasked with reducing
2 the budget allocation for faculty by 15 percent?

3 A I don't know that that — there may have
4 been an intervening period where the chair had
5 already identified that — something different. So
6 maybe he had a number in his head. Maybe he had
7 worked with Steve to identify, you know, basically
8 what the number would be. But I do know that it
9 was — the impetus was 15 percent reduction.

10 I don't know — I can't say specifically
11 that the committee was tasked with a 15 percent
12 reduction. Dr. Fiore would know that. He may have
13 said, listen, folks, we've done the analysis.
14 15 percent means probably around this number. But I
15 really don't have specific knowledge of that. That
16 would be my guess.

17 Q Do you know what the special committee used
18 to make their decision?

19 A I don't know a lot of the details, but I
20 know some of the things that they reviewed, sure, as
21 part of the decision-making process.

22 Q What were they?

23 A Things like the ratio of hours, credit hours
24 that students — student credit hours. I'm sure they
25 reviewed things like evaluations, the need within the

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1 was used or prepared?

2 A No.

3 Q You can set that aside then.

4 A Set it aside?

5 (Whereupon, Exhibit 108 was marked
6 for identification.)

7 Q Okay. Exhibit 108 is entitled: Faculty
8 non-renewals. Do you see that?

9 A Yes.

10 Q Okay. Do you know what context this
11 document was prepared?

12 A No.

13 Q Have you ever seen it before?

14 A I don't know.

15 Q You just don't have a recollection?

16 A Yeah. I mean, this looks like a list of the
17 faculty impacted.

18 Q It lists next to the faculty's name, their
19 department, and then whether they're tenure or
20 non-tenure track.

21 A Uh-huh.

22 Q Some of them seem to be retiring?

23 A Some of them are retiring.

24 Q Yes. This says retiring next to Joan
25 Knickerbocker on the first page.

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1 A Oh, yes. I see that.

2 Q Do you remember whether you received this

3 document at the time of the decision to non-renew?

4 A I don't remember.

5 Q Is it your testimony that the university was

6 aware that some of these professors were tenure and

7 some were non-tenure track that were going to be

8 non-renewed at the time, correct?

9 A Yes.

10 Q And you didn't make it a priority to ensure

11 that the non-tenure track professors would be

12 non-renewed before moving to the tenured faculty?

13 MR. NOLAN: Object. You can go

14 ahead.

15 A I wasn't part of that process.

16 Q You can set that aside.

17 (Whereupon, Exhibit 109 was marked

18 for identification.)

19 Q Exhibit 109 is Bates stamped AU, number of

20 0s, 3384 and 3385. Do you see that?

21 A Yes.

22 Q Do you recognize this document?

23 A No.

24 Q I assume you don't know in what context it

25 was created?

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1 A I don't.

2 Q Do you have any knowledge of what it's

3 intending to communicate?

4 A No.

5 (Whereupon, Exhibit 110 was marked

6 for identification.)

7 Q Handing you what's been marked as Exhibit

8 110. It starts at AU, number of 0s, 3368 and

9 continues through 3377. Do you see that?

10 A Yes.

11 Q Do you know what this document is?

12 A No.

13 Q The first page says total FT minus admin

14 APPT. Do you know what that means?

15 A Yes.

16 Q What does it mean?

17 A Total for full-time minus admin

18 appointments. Full-time, and I'm guessing that is

19 full-time faculty.

20 Q And what is the 9.43? What does that mean?

21 A I don't know the context for that number.

22 So I'm not sure.

23 Q Do you — can you interpret any of the

24 numbers on this page for me?

25 A Without knowing the context, I can't be

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1 sure.

2 Q Okay. Is this the kind of numbers that the

3 special committee would have been looking at?

4 A I don't know. I really don't know.

5 Q On the last page, AU 38377, there's a chart,

6 says: Anticipated major chart. Do you see that?

7 A Yes.

8 Q Is that the kind of numbers the special

9 committee would have been looking at?

10 A I don't know. Could have been.

11 Q You just don't know?

12 A I don't know.

13 (Whereupon, Exhibit 111 was marked

14 for identification.)

15 Q Okay. Exhibit 111 starts at AU, the number

16 of 0s, 3360 and continues through 3367. Do you see

17 that?

18 A Uh-huh. Yes.

19 Q This appears to be the total credits

20 generated. What does that term mean?

21 A I believe it's an analysis of the total

22 student credit hours generated by particular faculty

23 members, and that's calculated based upon the amount

24 of students in individual classes that these faculty

25 would be teaching.

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1 In other words, a course, if it's a

2 3-hour — 3-credit course, generally the Carnegie

3 rule would be that there would be 15 hours per credit

4 hours. That's a 45-hour course overall. So a

5 3-credit course, depending on how many students were

6 involved — how many students are enrolled, you can

7 then determine the student total credit hours

8 generated by any faculty member.

9 Q Okay. And do you want the number to be high

10 or low?

11 A I want the number to be high. It's more

12 efficient to have faculty that are teaching a greater

13 number of students.

14 Q Is the total credits generated per faculty

15 something that the special committee looked at in

16 determining who to non-renew?

17 A Yes. I am aware that this was one aspect.

18 Q And specifically do you know whether

19 Exhibit 111 was reviewed in that committee?

20 A I don't. I'm sure that a document like this

21 would have been reviewed. I don't know that this was

22 the document.

23 Q Okay. Where did the 15 percent on the

24 reduction side come from?

25 A It was part of the overall analysis as part

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1 of the formal process that we engaged in identifying
2 where — part of it is identifying where you score
3 against your peers. So in doing their peer analysis,
4 it's one of the things that we identified was that we
5 clearly were not aligned well with the peers in our
6 set, in our peer set.

7 Q So you determined that you needed to reduce
8 the amount you were paying faculty by 15 percent?

9 A We needed to reduce the amount of budget
10 dollars allocated to faculty by 15 percent.

11 Q That includes salary and other forms of
12 compensation?

13 A That's correct.

14 MS. MURRAY: Go off the record a
15 second.

16 (Whereupon, a recess was taken at
17 11:42 a.m. and resumed at 11:54 a.m.)

18 BY MS. MURRAY:

19 Q Do you want to go back to Exhibit 106.
20 Exhibit 106 is the August 5th, 2015, board minutes.
21 Do you see that?

22 A Yes.

23 Q If you turn to the second page. There was a
24 motion to move to executive session by Tom Whatman.
25 Do you see that?

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1 A Yes.

2 Q And then you indeed went to executive
3 session, correct?

4 A Right.

5 Q And then it says: Dr. Campo explained that
6 the purpose of today's meeting is to present the
7 senior administration's recommendations for
8 implementing the institutional and academic
9 prioritization reports and the rationale for those
10 recommendations. Did I read that correctly?

11 A Yes.

12 Q And is that true?

13 A Yes.

14 Q And when it says the senior administration's
15 recommendations, that's the work that you were
16 talking about that your team did in June of 2015 and
17 July of 2015?

18 A Yes. And previous to that.

19 Q And then if you just take a minute to read
20 that first paragraph —

21 A Okay.

22 Q — and let me know if there's anything that
23 you think is inaccurate or needs to be changed.

24 MR. NOLAN: The one beginning:
25 Dr. Campo explained?

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1 MS. MURRAY: Correct.

2 MR. NOLAN: Okay.

3 A That seems accurate.

4 Q Okay. And to summarize, you were explaining
5 to the board that there needs to be some reallocation
6 of resources, correct?

7 A Yes.

8 Q And then the next paragraph: Dr. Steve
9 Storck presented; is that correct?

10 A Yes.

11 Q And that, in fact, happened?

12 A Yes.

13 Q And he's the CFO or was the CFO at the time?

14 A Yes.

15 Q And he gave a financial health report,
16 correct?

17 A Yes.

18 Q Take a minute and read that paragraph along
19 with the bullet points in that Steve Storck
20 paragraph, and let me know if there is anything
21 inaccurate in that minute.

22 A That all seems accurate.

23 Q Okay. And the last sentence before the
24 bullet points in that paragraph reads: Reducing
25 personnel expenses and reallocating \$3 million in

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1 resources will provide the financial support to —
2 and then lists the bullet points, correct?

3 A Yes.

4 Q Is the \$3 million equivalent to the
5 15 percent that we were talking about earlier?

6 A Sounds about right.

7 Q And I'll just direct you to the paragraph
8 below the bullet points, it says: The academic
9 restructuring and subsequent budget model requires a
10 15 percent reduction of faculty personnel expenses.
11 Do you see that?

12 A Yes.

13 Q And so it appears from reading this that
14 those two numbers relate to each other. Is that your
15 understanding as well?

16 A Yes.

17 Q And then that paragraph indicates that
18 Dr. Fiore addressed the board; is that correct?

19 A Yes.

20 Q And that he addressed the concerns about the
21 academic impact of the personnel reduction by the
22 15 percent budget?

23 A Yes.

24 Q And I skipped over the middle line, which
25 says that faculty personnel expenses which will

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1 result in faculty non-renewals including tenured
2 faculty. Do you see that?

3 A Yes.

4 Q So you would agree that as of this board
5 meeting, there was an understanding that tenured
6 faculty would be non-renewed?

7 A Yes.

8 Q And the board participated in making that
9 decision?

10 A Right.

11 Q Appears from the minutes that it was a
12 recommendation from your administration, correct?

13 A That's correct.

14 Q The final decision came down to the board?

15 A Right.

16 Q If the board had said they didn't want to do
17 your recommendation, they had the power to do that?

18 A Yes.

19 Q The next paragraph, it appears that Josh
20 Hughes reported; is that correct?

21 A Yes.

22 Q And he was reporting that there was a
23 careful review of the faculty rules and regulations,
24 correct?

25 A Correct.

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1 Q And that included Article XII entitled:
2 Reduction of tenured faculty and faculty non-renewal
3 notification requirements?

4 A Yes.

5 Q And then Josh explained the processes and
6 time lines?

7 A Yes.

8 Q Do you remember what was said?

9 A No. I mean, beyond this. I mean, I
10 certainly would remember this discussion, but
11 specific language, I don't know.

12 Q You don't have a specific recollection?

13 A Right.

14 Q Was it your understanding at the time that
15 the only way that the non-renewal of tenured faculty
16 would be allowed under the faculty rules and regs
17 would be to look at Article XII, the reduction of
18 tenured faculty?

19 A Would you please repeat the question?

20 MS. MURRAY: Could you read it?

21 (Whereupon, the court reporter read
22 back the requested portion of the record.)

23 A Yes.

24 Q And was it your understanding at the time
25 that you were looking at the formal restructuring

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1 provision in that article?

2 A Yes.

3 Q So this paragraph says that there was a
4 careful review, and then there's comma, and it says:
5 And faculty non-renewal notification requirements.

6 I just want to make sure I understand that
7 Josh's report was not just about the notification
8 requirements; it was also about the entire process of
9 the decision to non-renew tenured faculty?

10 MR. NOLAN: Before you answer, I'm
11 just going to object to the extent it's
12 asking for legal advice that Mr. Hughes
13 would have been communicating in his
14 legal capacity at the university.

15 You can go ahead and answer to the
16 extent he was communicating other than
17 legal advice or in his HR non-legal
18 capacity.

19 A Right. So he was communicating more than
20 just the notification requirements.

21 Q The next paragraph says: Discussion
22 followed regarding the faculty reduction,
23 implementation plan, budget savings, reallocation of
24 existing resources, and goes on from there.

25 A Yes.

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1 Q Do you remember that discussion?

2 A Yes.

3 Q What was — was the discussion among board
4 members?

5 A It was among the entire group.

6 Q What was the content of that discussion?

7 A I think it's outlined pretty well here. The
8 idea that we would support the release faculty and do
9 all that we could to support them and bring them back
10 as possible, potential legal ramifications as it
11 outlines there as well, and then the whole idea of
12 how this reallocation would move forward.

13 MS. MURRAY: I just want to note a
14 general objection to — I understand
15 Josh is an attorney — Josh Hughes is an
16 attorney. I want to note a general
17 objection. If we could just have a
18 standing objection to attorney-client
19 privilege issues as it relates to him as
20 an HR official, and we can sort it out
21 later.

22 MR. NOLAN: So you're objecting in
23 your own deposition?

24 MS. MURRAY: I'm objecting to your
25 characterization of your objection.

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1 MR. NOLAN: You're objecting to my
2 objection?

3 MS. MURRAY: Yes.

4 MR. NOLAN: Yeah, I mean,
5 Mr. Hughes has two capacities, and I
6 understand. I'll continue to do that,
7 but yes, I understand we may need to
8 talk about the parameters of that.

9 MS. MURRAY: Okay.

10 BY MS. MURRAY:

11 Q So without talking about any communications
12 that you received from any of your attorneys, what is
13 your understanding of the potential legal
14 ramifications as is listed in this minute?

15 A My understanding — I think the
16 understanding is that we wanted to do all that we
17 could to ensure that we were protecting the
18 institution from any potential legal vulnerabilities
19 and following through with the plan and the formal
20 process in the fashion that we had designed all
21 along.

22 Q And does that mean you were concerned about
23 potential claims by the affected non-renewed tenured
24 faculty?

25 A I'm sure that that was part of the concern.

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1 I will tell you that at that point, it was the
2 concern for the human lives and the families that
3 would be impacted by this change. We are a very
4 close and closely tied community, and we all knew
5 what impact this would have on our community. It's
6 still impacting our community, and that was by far
7 the overriding factor and concern that day.

8 Q If we go back to Steve Storck's
9 presentation. The last sentence of the Steve Storck
10 paragraph says: Reducing personnel expenses and
11 reallocating \$3 million in resources will provide the
12 financial support to — and then it lists a number of
13 items. Do you see that?

14 A Yes.

15 Q Are those items part of the restructuring
16 that you were talking about?

17 A Yes.

18 Q Is this the main emphasis of the
19 restructuring at that time?

20 A I'd say they include the priorities, yes.

21 Q And then the next page has the motion to
22 accept and adopt and implement the financial academic
23 and institutional prioritization reports?

24 A Yes.

25 Q And then — and that motion carried

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1 unanimously?

2 A Right.

3 Q And then the next motion is to reallocate
4 the \$3 million of the overall budget in order to fund
5 the strategic priorities of the institution and
6 references the formal restructuring; is that correct?

7 A Yes.

8 Q And that motion carried unanimously?

9 A Yes.

10 Q In the discussion, did anyone voice an
11 objection to implementing that plan?

12 A No.

13 Q No one objected to the non-renewal of
14 tenured faculty?

15 A No.

16 Q And then the meeting was adjourned?

17 A Yes.

18 Q The special committee was put together after
19 this meeting?

20 A Right.

21 Q Right. And then did you meet with any of
22 the plaintiffs?

23 A Yes. I remember meeting with Rachel
24 Wlodarsky. I've met Bill Cummins. I don't know that
25 we met in the context of non-renewals.

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1 Q So Rachel had sent you a request to meet —

2 A Yes.

3 Q — in response to her notification of
4 termination or non-renewal?

5 A I can't remember if that's why, but I do
6 remember meeting with her.

7 Q What do you remember about the meeting?

8 A I remember that she was passionate and hurt
9 and concerned and that she felt that she had a lot to
10 offer the institution and was hoping that she could
11 stay on and not — and not have her contract expire
12 after 18 months.

13 Q What did you tell her?

14 A I told her that we were committed to doing
15 all that we could to bring people back as we could,
16 but that this was part of a formal process that would
17 be done more than a year ago, two years ago. And as
18 outlined in the documentation, you know, we had every
19 indication that our financial indices demanded a
20 formal and immediate and urgent restructuring but
21 that we would stay in communication with her and hope
22 that she could return.

23 Q And would you agree that the piece of the
24 restructuring that you didn't have flexibility on was
25 the need to cut the budget by \$3 million?

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1 A I think it's clear that the restructuring
2 process was very thorough, and it indicated that for
3 us to meet our objectives that that was the right
4 amount to reallocate.

5 Q And sticking with that objective meant that
6 there had to be those non-renewals once that decision
7 was made, correct?

8 A Right.

9 Q Would you agree that when the board reviewed
10 the appeals of these individual faculty that were
11 non-renewed, they were not reviewing their decision
12 to reduce the overall budget by \$3 million?

13 A I don't believe the board reviewed their
14 action of the reduction after this approval.

15 Q You say "this approval," you're pointing to
16 Exhibit 106?

17 A I'm sorry. That's correct.

18 Q So just bear with me —

19 A Sure.

20 Q — because I think that was a bad question.

21 You would agree that in August of 2015, the
22 board decided to reduce the overall budget by
23 \$3 million, correct?

24 A To reallocate, yes. Uh-huh.

25 Q And in doing so, one of the mechanisms they

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1 decided to use was to non-renew some tenured faculty?

2 A Yes. I would say just to be more precise
3 that they — the mechanism involved the reduction of
4 faculty. I think one of the things that I haven't
5 clarified in my testimony is that we knew we were
6 operating in a formal restructuring process. So
7 we — we knew all along that we had the ability,
8 because we were under that process, to eliminate
9 tenured or non-tenured. So we didn't make the
10 distinction. And I don't know that you're making
11 that distinction. I just want to clarify that
12 distinction.

13 Q And I'm making the distinction. I
14 understand that you have broad responsibilities for
15 the university.

16 A Right. Sure.

17 Q We're here today because some tenured
18 professors were non-renewed.

19 A I understand.

20 Q So that's why we're focused on that part.

21 A Sure.

22 Q So just to make sure my time line is
23 correct, the minutes reflect that in August of 2015,
24 the board made the decision that there would be some
25 tenured faculty that were non-renewed?

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1 A Yes.

2 Q And then you're indicating that the board
3 never reconsidered that decision, correct?

4 A I believe that's correct. They did not ever
5 formally reconsider that decision.

6 Q And then the — after the notification to
7 the non-renewed faculty, some of the faculty decided
8 to go through the formal appellate process, correct?

9 A Correct.

10 Q All of the plaintiffs in this case decided
11 to go through the appellate process, correct?

12 A I believe so. I believe that's correct.

13 Q You didn't have any direct hands-on in that
14 appeals process?

15 A I did not. I had no formal role.

16 Q Dr. Fiore did?

17 A Yes.

18 Q What was his role?

19 A I believe that his role was to hear their
20 rationale for why they believe the action that was
21 taken was not — did not comport with faculty rules
22 and regulations.

23 MS. MURRAY: Could you read that
24 back.

25 (Whereupon, the court reporter read

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1 back the requested portion of the record.)

2 BY MS. MURRAY:

3 Q Was it Dr. Fiore's role to represent the
4 university's position in the appellate process?

5 A I think that was part of it, yes.

6 Q What is your understanding of the
7 professional standards and responsibilities committee
8 in this appellate process?

9 A I believe they were an adjudicating body to
10 hear information and then to relay some sort of
11 judgment about the actions taken.

12 Q Is it your understanding that the PSRC made
13 a determination that the decision to non-renew the
14 tenured faculty was in violation of the rules and
15 regs?

16 A I don't know that that was the specific
17 language, but I do know that they ruled in a fashion
18 that indicated they were not of the opinion that the
19 action that was taken was part of a formal
20 restructuring process.

21 Q Let me make sure we're clear about that.

22 A Okay.

23 Q So you understand that the PSRC ruled that
24 the non-renewal was not part of a formal
25 restructuring; is that correct?

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1 A Yes. It was their understanding. It was
2 their opinion, yes, that it was not.

3 Q Setting aside what their result or opinion
4 is —

5 A Right.

6 Q — what is your understanding of their role
7 in the process?

8 A Did I answer that question?

9 Q You answered it with the result. So I want
10 to just take a step back and be more process
11 oriented. What is your understanding of what
12 their —

13 A Their process was to hear the rationale from
14 faculty members, gain information, and then
15 adjudicate and offer an opinion.

16 Q And what effect is the university's
17 obligation to — strike that.

18 What is the university's obligation to give
19 effect to those opinions?

20 A To give — I didn't hear that word.

21 Q Effect.

22 A Give effect to those opinions? What is the
23 university's obligation to give effect to those
24 opinions? I don't understand the question.

25 Q Okay. I'll ask it another way.

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1 A Sorry. And I'm an English major, and that's
2 trouble.

3 Q The PSRC issued — how would you describe
4 it? An opinion?

5 A An opinion, sure.

6 Q — issued an opinion. What is the
7 obligation of the university to take action on that
8 opinion?

9 A I believe that the university is not obliged
10 to take action on the opinion, but certainly the
11 university would take that opinion into some
12 consideration, as would be appropriate.

13 Q Were you a part of considering that opinion?

14 A Not formally, no.

15 Q Was that the ad hoc committee of the board
16 that did that?

17 A Yes.

18 Q Would you agree that the — at the time the
19 board — strike that.

20 Would you agree that the ad hoc committee of
21 board members that reviewed the appeal in March of
22 2016 had already determined that the university was
23 able to non-renew tenured faculty as a part of the
24 restructuring?

25 MR. NOLAN: Object to form. You

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1 can go ahead.

2 A Yes.

3 Q So the ad hoc committee wasn't looking at
4 that aspect when they reviewed the appeals process of
5 the PSRC?

6 A I can't speak to that. I wasn't part of
7 that committee. I wouldn't know.

8 Q Would you agree that part of that review of
9 the appeal process, the board focused on whether the
10 individual appellant had been mistreated?

11 A I'm sure the board did its due diligence in
12 the appeals process, but I don't have any knowledge
13 of those details and what they considered. I wasn't
14 there. I wasn't part of it.

15 Q But you do know that the board never went
16 back and reconsidered whether the whole structure of
17 the decision to non-renew was problematic?

18 A I don't know that. But I do know there was
19 never a formal meeting at which the board
20 reconsidered the process.

21 MS. MURRAY: Off the record a
22 second.

23 (Whereupon, a discussion was held off
24 the record.)

25 (Whereupon, Exhibit 112 was marked

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1 for identification.)

2 MR. NOLAN: This is just to
3 summarize a brief discussion off the
4 record. What Miss Murray is about to
5 mark as Exhibit 112 we've marked as
6 attorneys eyes only. We've agreed that
7 we can look at it in this deposition.

8 I would caution again that when we
9 get to the point of transcribing, if we
10 do, that we collectively work out how
11 we're going to deal with that and then
12 that Miss Murray shouldn't show it to
13 her clients without talking to us first.

14 And in our discussion, I also
15 identified Exhibit 106, what we
16 previously marked, we would designate
17 that attorneys eyes only, and again
18 subject to the mechanisms to talk about
19 that if that's a concern to Miss Murray.

20 Does that sound right?

21 MS. MURRAY: That sounds right.

22 And I just reserve the right to talk
23 about it under the protective order.

24 And then I also just wanted to put
25 on the record a formal request for a

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1 privilege log for the items that are
2 redacted on the second page of
3 Exhibit 112.

4 MR. NOLAN: Okay. Noted.

5 BY MS. MURRAY:

6 Q Okay. You've been handed Exhibit 112. Do
7 you see that?

8 A Yes.

9 Q And this is the board minutes in executive
10 session from March 19, 2016. Do you see that?

11 A Yes.

12 Q Okay. And were you at this meeting?

13 A Yes.

14 Q And is this the meeting that occurred after
15 the ad hoc committee met?

16 A Yes.

17 Q And then if you turn to the second page, it
18 looks like Joyce Lamb reported on behalf of the
19 ad hoc committee. Do you see that?

20 A I do.

21 Q And she reported that they carefully and
22 expeditiously reviewed. Committee members took the
23 lead on specific appeals assigned to them. Do you
24 see that?

25 A Yes.

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1 Q If you just read that first paragraph and
2 let me know if there's anything inaccurate in that
3 paragraph.

4 A No. Nothing.

5 Q Okay. And then they're bringing the
6 recommendation to the full board. What's the
7 recommendation they're bringing?

8 A I believe they're bringing the
9 recommendation that takes the form of the motion that
10 follows, that affirms the actions of the
11 administration.

12 Q And denies the faculty appeal, correct?

13 A Correct.

14 Q And when it says denies the faculty appeal,
15 they're referring to the appellate process that we
16 were just talking about with the professional
17 standards and responsibilities committee?

18 A Yes.

19 Q And is it accurate that none of the tenured
20 faculty that appealed had their appeal affirmed?

21 A That's accurate.

22 Q And then if you turn to the last page, it's
23 5563?

24 A Uh-huh.

25 Q There was a discussion on the resolution

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1 intent and content, and Mr. Whatman suggested the
2 resolution should not be passed and recommended that
3 Dr. Campo and Joyce Lamb consult further to determine
4 the proper communication. Do you see that?

5 A Yes.

6 Q Do you remember that?

7 A Yes.

8 Q What was that discussion?

9 A I don't recall.

10 Q Do you remember why Mr. Whatman suggested
11 the resolution should not be passed?

12 A No.

13 Q Do you remember, did you have a following
14 discussion with Joyce Lamb?

15 A I'm sure that we did. I just don't remember
16 the context for it.

17 Q I'm assuming that Mr. Whatman had some
18 concern about something; is that fair?

19 A Probably. I honestly just don't remember
20 what it's referencing.

21 Q So you don't remember whether it was
22 something to do —

23 A I don't think it was.

24 Q You don't think it was what?

25 A Had something to do with the previous motion

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1 or this action. But I honestly don't recall.

2 Q Well, then Dale Thomas withdrew the motion
3 to approve the resolution?

4 A Right.

5 Q You're saying that you don't think that the
6 withdraw was anything to do with the appeal of the
7 faculty members?

8 A I don't know that it did. I don't know the
9 context, so I really can't say.

10 Q Do you remember eventually, whether it was
11 this meeting or a subsequent meeting, whether the
12 recommendation of the ad hoc committee was approved?

13 A Yes.

14 Q It was approved?

15 A Yes.

16 Q And was it approved unanimously?

17 A That's my recollection.

18 Q Okay. So if you go back to the third
19 paragraph on the second page. It starts with
20 Dr. Campo.

21 A Yes.

22 Q So you would agree that you gave an
23 explanation at this meeting, correct?

24 A Yes.

25 Q And you talk about the formal restructuring?

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1 A Yes.

2 Q Correct me if I'm wrong, but it appears your
3 position at the time is consistent with your
4 testimony today that you believe that there was an
5 ongoing formal restructuring and the faculty
6 non-renewals were part of that?

7 A Yes.

8 Q And then you point out that in the faculty
9 rules and regs, Article XII, Section B, there's a
10 grounds for reduction that allowed the non-renewal of
11 tenured faculty in the event of, quote, the formal
12 restructuring of a program or department of
13 instruction not mandated by financial exigency, end
14 quote.

15 A Yes.

16 Q Did I read that correctly?

17 A Yes.

18 Q And is that, in fact, the grounds for
19 reduction that the university is relying on?

20 A Yes.

21 Q And the formal restructuring, as an English
22 major, you would agree, is of a program or department
23 of instruction, correct?

24 A Yes.

25 Q You weren't able — you're not able, as you

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1 sit here today, to point out any formal restructuring
2 of a program or department that affects the
3 plaintiffs in this case, correct?

4 A No.

5 MR. NOLAN: I'm going to object.

6 You can go ahead.

7 A It's incorrect.

8 Q What formal restructuring of the programs,
9 departments for the plaintiffs in this case occurred?

10 A Significant.

11 Q What?

12 A We have restructured for — just for
13 example, we have restructured — the entire core has
14 been restructured since this time.

15 Q If I wanted to do my own analysis, I could
16 look at the course catalogs and the publicly
17 available communications about what the core is from
18 the university?

19 A Sure. Yes.

20 Q And you would agree that I'd be able to see
21 what kind of restructuring has occurred?

22 A Absolutely.

23 Q Anything else?

24 A Yes. We have restructured the emphasis on
25 our new writing initiative. That's part of — our

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1 restructure would have impacted these departments as
2 well.

3 Q Anything else?

4 A Probably would — if I dove deeper into the
5 academic — specific academic programs, could
6 identify other restructuring that was related to new
7 initiatives for online education as well.

8 Q Anything else?

9 A No. I think they would all be related to
10 those academic areas.

11 Q Did you participate in the ad hoc committee
12 meeting in any way for the board, this board meeting
13 that occurred prior to the March 2016 board meeting?

14 MR. NOLAN: Are you pointing to
15 something?

16 Q Let me ask that again.

17 Did you participate in any way to the ad hoc
18 committee meeting of board members that met prior to
19 the March 19th, 2016, full board meeting?

20 A No.

21 Q Did you make any recommendations to that
22 ad hoc committee?

23 A No.

24 Q Were you called by that ad hoc committee?

25 A I don't believe so.

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1 Q You don't believe so?

2 A I don't believe so.

3 Q You don't have any memory of that?

4 A No, I don't.

5 Q Would you agree that if there was a change
6 to the curriculum that that had to go through the
7 faculty senate?

8 A Most curricular changes are required to go
9 through the faculty senate, yes.

10 Q Did that happen in conjunction with the
11 decision to non-renew the tenured faculty?

12 A I don't believe there were curricular
13 changes, no.

14 Q Did you review any report that came out of
15 the ad hoc — the board ad hoc committee in
16 March 2016?

17 A I don't know that I reviewed a formal
18 report, no.

19 Q And did you participate in the letters that
20 went to the — strike that.

21 Did you participate in drafting the letters
22 that went to the non-renewed faculty after the March
23 of 2016 board meeting denying their appeals?

24 A I may have. I don't recall my role in that.
25 I'm sure I saw it before it went out, and I may have

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recommended changes. I don't know.

Q You approved it?

A Right.

Q You signed it?

A Yep.

Q Did you give direction as to the content?

A No. I wouldn't have given direction to the content, only because I would have relied on the board for that.

Q Who would have drafted that letter?

A I would think it would have been the chair, Joyce Lamb.

Q I don't want you to relay any communications you had with counsel, but did you rely on counsel to draft that letter?

A Joyce may have. I don't believe I referred the letter to counsel.

(Whereupon, Exhibit 113 was marked for identification.)

Q Just handed you what's been marked as Exhibit 113. It's entitled: Resolution of the Ashland University faculty senate, October 9th, 2015. Do you see that?

A Yes.

Q Have you seen this resolution before?

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A I believe so.

Q Did this resolution pass?

A I don't know.

Q Did the administration take any action in response to this resolution?

A Not any formal action of which I'm aware.

Q Do you know if the ad hoc committee considered this resolution when it conducted its review of the appeal?

A I don't know.

Q Did the full board consider this resolution when it considered the appeals in the March 19, 2016, meeting?

A I'm not sure.

Q Do you know if the board considered this resolution at any other time?

A Not that I know of.

Q And as the president, you didn't take any action in response to this resolution, correct?

A The resolution asks that the administration reverse its decision, and we did not take that action. I would say we did take the action referenced in the second part of that sentence: To work with the faculty thoughtfully as two partners to advance the best interest of Ashland University and

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its students, and continue to do so.

(Whereupon, Exhibit 114 was marked for identification.)

Q Handing you what's been marked as Exhibit 114. It's entitled: Progress report on restructuring and targeted college of arts and sciences' departments. Do you see that?

A Yes.

Q Have you seen this document before?

A I've seen something like this. This looks very familiar. Yes.

Q It's not dated, at least that I can find.

A Uh-huh. Right.

Q Do you have a time frame as to when this was created?

A Well, certainly was in that period. You can see that they reference in 2015 here. So this is an update. But it's also referencing some very — some much earlier time frame, so I would suggest somewhere between 2014, 2016. Yes, because you can see November 2015 is referenced at the bottom of the first page. So —

Q So it must have been — it says — the last sentence that you're pointing to —

A Uh-huh.

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Q — says in November of 2015, the college of arts and sciences was notified?

A Uh-huh.

Q Do you see that?

A Yes.

Q So your best educated guess is this happened sometime after November 2015?

A Yes. But obviously much of the language is much older than that, reference to 2014 as well.

Q Was this progress report delivered to you?

A I'm sure it went to the provost. But I have seen, if not this document, something very similar.

Q What was the purpose of this document?

A We — this was part of our ongoing commitment to prioritization and the restructuring process.

Q So structurally there is different departments within the college of arts and sciences listed. Do you see that?

A I do.

Q The second department is computer science?

A Uh-huh.

Q And then in italics, it says, restructure, reorganize, reduce. Do you see that?

A Yes.

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1 Q Is that a reference to the academic
2 prioritization report that was delivered to the board
3 in May of 2015?

4 A It is. That's a formal status that had been
5 assigned that area.

6 Q And then who would have drafted the language
7 underneath the italics?

8 A So beginning with the word "between"?

9 Q Uh-huh.

10 A I'm not sure. This could have come out
11 of — because this is listed in the college of arts
12 and sciences, I would assume that it came out of the
13 dean's office. So someone in that office, I would
14 say, was responsible for that language.

15 Q So you don't have any close familiarity with
16 how this report came about?

17 A My understanding would be that all of the
18 deans would have provided one of these. This is just
19 arts and sciences. I don't see the others listed
20 here. But this — every college would have had a
21 similar document to this.

22 Q If you look at each different department, it
23 has different language use and different sort of
24 style. If you look at like the philosophy
25 department, it's like a defense of needing more

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1 staff. Would each department chair have participated
2 in drafting the response?

3 A I think it's possible. It's listed as a
4 college, so as I say, the dean's office would have
5 had final oversight, but I'm sure they received input
6 from others.

7 Q Would Fiore know more —

8 A Yes.

9 Q — about this report?

10 A But clearly much of this report is taken
11 from the prioritization report. That language is
12 taken directly out of the prioritization report.

13 Q When you say "that language," you're
14 referring to the italics portion of the —

15 A Primarily, yes. And those designations,
16 those formal designations of restructure.

17 (Whereupon, Exhibit 115 was marked
18 for identification.)

19 Q Just handed you an exhibit marked as 115.
20 This says that Ashland University concludes academic
21 portion of institutional review process. And it
22 says, for release, April 8, 2015. Do you see that?

23 A Yes.

24 Q Is this like a release from the
25 administration for kind of public — press release or

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1 public relations release?

2 A It just says release. I'm not sure. It
3 looks like it's probably an internal document. I
4 don't think others would be interested.

5 Q Is this the type of communication that would
6 go to the faculty and staff to communicate?

7 A It looks like that, yes.

8 Q And this is right after your — the
9 announcement that you were hired, correct?

10 A Yes.

11 Q But there's a lot of references to Crothers
12 throughout the document. Would he have been the one
13 directing this communication?

14 A Yes.

15 Q Then in the fourth paragraph, the first
16 paragraph that starts with Crothers, you see that?
17 Crothers said this academic review process is just
18 one thread —

19 A Yes.

20 Q — in a number of items being considered
21 that will help the university overcome the challenges
22 that private colleges are facing, including limited
23 financial resources and strong competition for
24 students.

25 A Yes.

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1 Q Do you see that?

2 A I do.

3 Q And does that refer to the reallocation
4 process that we've been talking about today?

5 A Yes.

6 MR. NOLAN: Go off the record a
7 second.

8 MS. MURRAY: Yeah.

9 (Whereupon, a discussion was held off
10 the record.)

11 BY MS. MURRAY:

12 Q I just want to make sure the record is
13 clear. So you did not have any direct hands-on
14 involvement in that appellate process in the fall of
15 2015, correct?

16 A Correct.

17 Q And I know you said Dr. Fiore was one of the
18 representatives of the university. Is there anybody
19 else that I should be speaking to if I wanted to know
20 about the university's involvement in that process?

21 A Not at the administrative level, no.

22 Q Are you making that distinction because the
23 faculty would have been intimately involved in the
24 context of the people that sat on the professional
25 standards and responsibilities committee?

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1 A Yes. And the board may have been involved
2 in the process at a later time as well.

3 Q Are you referring to the process when they
4 received the opinion —

5 A Right.

6 Q — of the committee?

7 A Right.

8 MS. MURRAY: Okay. I have no
9 further questions. Thank you.

10 THE WITNESS: Thank you.

11 MR. NOLAN: Read.

12 (Whereupon, the deposition was
13 concluded at 12:44 p.m.)
14 ---
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CARLOS A. CAMPO

****CONFIDENTIAL****

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1 C-E-R-T-I-F-I-C-A-T-E
2
3

4 I, Teri Genovese Mauro, a Notary Public in and
5 for the State of Ohio, duly commissioned and
6 qualified, do hereby certify that the within-named
7 Witness, **CARLOS A. CAMPO**, was by me first duly sworn
8 to tell the truth, the whole truth and nothing but
9 the truth in the cause aforesaid; that the testimony
10 then given by him was by me reduced to stenotype in
11 the presence of said Witness, afterwards transcribed
12 upon a computer; that the foregoing is a true and
13 correct transcription of the testimony so given by
14 him as aforesaid.

15 I do further certify that this deposition was
16 taken at the time and place in the foregoing caption
17 specified and was completed without adjournment.

18 I do further certify that I am not a relative,
19 employee of or attorney for any of the parties in
20 the above-captioned action; I am not a relative or
21 employee of an attorney of any of the parties in the
22 above-captioned action; I am not financially
23 interested in the action; I am not, nor is the court
24 reporting firm with which I am affiliated, under a
25 contract as defined in Civil Rule 28(D).

IN WITNESS WHEREOF, I have hereunto set my hand
and affixed my seal of office at Toledo, Ohio, on
this 28th day of November, 2018.

TERI GENOVESE MAURO
Notary Public
in and for the State of Ohio

My Commission expires
June 8, 2023.

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BY MS. MURRAY:

[8] 4/19 33/8
69/2 109/17
117/9 124/1
129/4 144/10

MR. NOLAN: [35]

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