



Oklahoma High School
Mock Trial Program
2018-2019

Jessie Lannister
v.
Kai Connely

Written by:

Lydia Anderson Fields, Weston Watts, Shea Bracken, Orion Strand, Michael Nesser,
Todd Murray, and Kevin Cunningham
OBA Mock Trial Case Development Committee

The Mock Trial Committee thanks our dedicated Case Development Committee for this exciting original case. We hope you find these materials interesting and educational. Best of luck during the competition! This is a work of fiction. Names, characters, events and incidents are either the products of the authors' imagination or used in a fictitious manner. Any resemblance to actual persons, living or dead, or actual events is purely coincidental.



OKLAHOMA
BAR FOUNDATION
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Oklahoma Bar Foundation, IOLTA Grant

This case is fiction. However, the subject matter is very real. If you or someone you know is struggling emotionally, being bullied, or having a hard time, be the difference in getting them the help they need by contacting one of the resources listed below.

Stop Bullying.gov:

<https://www.stopbullying.gov/get-help-now/index.html>

National Crisis Text Line:

741-741

#BeThe1To- Be The One to Save a Life:

www.bethe1to.com

“We have a stigmatization in our society today that is hurting our youth, even killing our youth. We cannot hide the fact that we all need help. It is not a broken thing to be depressed. I have a therapist. It does not make me broken. It does not make me weak...don’t hold it in, talk to somebody. You are not broken.”

Dan Reynolds, Imagine Dragons, June 16, 2018.

WITNESS AND EXHIBIT LIST

PROSECUTION WITNESSES	DEFENSE WITNESSES
Val Gray	Kai Connely
Jessie Lannister	Cameron Myers
Penn Everett, MD	Drue Ellis, MD

EXHIBIT*	EXHIBIT NAME
Exhibit 1	Hannah Lannister's Diary
Exhibit 2	Autopsy Report
Exhibit 3	Text Messages between Lannister and Connely
Exhibit 4	Winchester High School Student Report Form
Exhibit 5	Winchester High School Investigation Report
Exhibit 6	RDEX posts (Winchester High Idea Exchange Site)
Exhibit 7	Expert Report from Penn Everett
Exhibit 8	Expert Report from Drue Ellis

*The preceding exhibits may be used by teams in competition. They are pre-marked and are to be referred to by number.

STIPULATIONS

The Plaintiff and Defense stipulate to the following facts:

1. There is no issue of jurisdiction or venue.
2. The applicable law is contained in the jury instructions. These may not be read into the record. Pleadings and jury instructions may not be objected to at the trial.
3. The exhibits are true and authentic copies. Their authenticity may not be challenged. Unless stated otherwise, admissibility of exhibits may be challenged on other grounds.
4. The witnesses gave their statements as indicated in the case. Each witness was given the opportunity to review the statement prior to and in preparation for trial.
5. The trial is only addressing the liability of the Defendant. The damages phase shall take place only if the Defendant is found liable to Plaintiff. Any reference to possible damages, including the range of potential damages is immaterial and inadmissible.
6. Whenever a rule of evidence requires that reasonable notice be given, it has been given.
7. Defense counsel was present for Defendant's statement.
8. The Defendant Kai Connely is being sued as an adult- Connely was 18 years old at the time of the alleged incident.
9. There is no issue with the rights of Jessie Lannister to bring the claims in this case, standing is proper.
10. Winchester High School is not involved in any litigation (lawsuit) concerning Hannah Lannister and no mention shall be made on any potential liability for Hannah's passing. Winchester High School complied with all applicable laws and regulations on reporting and documenting bullying allegations.
11. It is undisputed that Hannah Lannister died the evening of November 11, 2016.

STATEMENT OF THE CASE

(This is intended as a summary only and not to be used as evidence in the trial)

This is a civil trial focused on the actions of Kai Connely and the death of Hannah Lannister on November 11, 2016. The Defendant Kai Connely is being sued for Wrongful Death, Intentional Infliction of Emotional Distress, and any other claims supported by the Petition and evidence under Oklahoma law. The suit is brought by Jessie Lannister, parent of Hannah Lannister. Kai Connely is a student, age 18 on July 1, 2016, at Winchester High School in Winchester, Oklahoma. The decedent, Hannah Lannister, was also a student at Winchester High School. The primary issue in this case is whether Kai Connely is civilly liable/responsible for Hannah's death.

On the evening of November 11, 2016, Hannah Lannister died in the locker room of her high school gymnasium. Hannah was a junior at Winchester High, home of the Raiding Danes. Hannah was a basketball manager her sophomore year. She helped set-up and tear-down practices for the team, she prepared and distributed water during practice and games. She was also involved in several school activities, including student council and the debate team. At times, she was teased by other students, but her sophomore year concluded without any reported events. However, several things happened between her sophomore year and the winter of her junior year that are important to the pending case.

In August 2016, Hannah Lannister returned to school for her junior year. During that Fall, she attempted to organize a memorial concert to commemorate the two-year anniversary of the passing of Alex Snow, guitarist for Heisenberg- a now-defunct band from Oklahoma. The death of Alex Snow was a topic of significant controversy that even resulted in criminal charges against another member of the group. The outcome of that trial is immaterial for this case, but Hannah Lannister was present for Heisenberg's last concert on November 2, 2014 at The Rising Sun in OKC. Hannah's idea for a memorial concert never took off and she ended up being teased for the idea.

Also, around the same time as Hannah's efforts on the memorial concert, she made the Winchester basketball team and quickly became an important player for the team. Her inclusion on the team resulted in the exclusion of another player. The excluded player's friends, Kai Connely in particular, were displeased with Hannah's inclusion on the team at the expense of their friend. A series of events, comments, actions, statements and responses resulted therefrom, including Kai providing Hannah with some training equipment to help Hannah's progression as a player. In the month or so before November 11th, Hannah was treated more harshly than ever before.

On November 11th, 2016, the team had just lost another hard-fought and close game to a rival school. That was the fourth (4) loss in a row and the team was winless to begin the season. Hannah's play over the first few weeks had caused some of the recent losses and other students were blaming her for the team's bad performance. Over the last week or so of her life, the treatment of Hannah included serious references to self-harm and exclusion through a school-connection application created by Winchester High School.

In 2015, Winchester High School developed and released an intra-school social media connection application to allow students and educators to communicate and exchange ideas regarding school-related topics. The application was titled "RDEX", which stood for **R**aiding **D**anes **i**dea **E**Xchange. The application was free to download, was limited to students and educators, and could be accessed at any time from any location. Unfortunately, the application was used for inappropriate communications between students and was shut-down after the passing of Hannah Lannister. Winchester officials did not monitor the inter-student communications, but individual educators/teachers were responsible for content they shared or received. Winchester High School is not involved in this matter as a party, but the principal for the school is a witness. The other witnesses are the Defendant, the parent of Hannah Lannister, a trainer and two expert witnesses.

**THE DISTRICT COURT OF TRAVIS COUNTY
STATE OF OKLAHOMA**

**JESSIE LANNISTER, Individually and as
Personal Representative of THE ESTATE
OF HANNAH LANNISTER,**)
)
)
)
PLAINTIFF,)
)
vs.)
)
KAI CONNELLY,)
)
)
DEFENDANT.)

CJ-2017-747

PETITION

Plaintiff, JESSIE LANNISTER, Individually and as Personal Representative of THE ESTATE OF HANNAH LANNISTER, (“Plaintiff”) brings this suit against KAI CONNELLY (“Defendant”) and allege and state as follows:

1. Plaintiff Jessie Lannister is an individual domiciled in Travis County, State of Oklahoma.
2. Defendant Kai Connely is an individual domiciled in Travis County, State of Oklahoma.
3. This cause arises from the death of Hannah Lannister, a minor.
4. This Court has jurisdiction over this subject matter and the parties.
5. Venue is proper in this Court.

FACTS

6. Plaintiff is the natural parent of Hannah Lannister, deceased.
7. Plaintiff has been appointed Personal Representative of The Estate of Hannah Lannister.
8. Upon current information and belief, Kai Connely, systematically bullied Hannah Lannister, deceased, on social media including a school-created electronic communication website known as RDEX using harassment, intimidation, and threatening behavior.

9. The intimidation included both words, written and spoken, directed at Hannah Lannister.
10. The subject matter of the bullying included Hannah Lannister's physical abilities (or lack thereof), her physical appearance, her intelligence (or lack thereof), and an unsuccessful promotion of a memorial concert at Winchester High School for a local band.
11. Kai Connely's bullying also included the physical act of placing a noose inside the decedent's locker.
12. Upon entering the locker room after a home basketball game at Winchester High School on November 11, 2016, Hannah Lannister opened her locker found rope tied into a noose.
13. Upon the sight of the noose and in conjunction with and the culmination of the months of stress, intimidation, and bullying which Kai Connely directed at Hannah Lannister, she suffered a fatal heart attack and died shortly thereafter.
14. The injuries and ultimate death of the Plaintiff's decedent, Hannah Lannister, was the direct and proximate result of the careless and negligent omissions and intentional acts of the Defendant, Kai Connely.
15. Kai Connely's actions were so extreme and outrageous as to go beyond all possible bounds of decency and would be considered atrocious and utterly intolerable in a civilized society.
16. Kai Connely intentionally or recklessly caused severe emotional distress to Hannah Lannister beyond that which a reasonable person could be expected to endure.
17. As a result of the wrongful death of Hannah Lannister, Plaintiff sustained injuries and incurred expenses and damages, including medical and funeral expenses; mental and physical pain and suffering, past, and future; and other damages to be determined during discovery.
18. The Plaintiff, Jessie Lannister, individually and as Personal Representative of the Estate of Hannah Lannister, has in the past and will continue in the future to suffer actual

damages in an amount in excess of Seventy-Five Thousand Dollars (\$75,000.00) for the injuries and ultimate wrongful death of Hannah Lannister.

19. Clearly and convincingly, the conduct of the Defendant, Kai Connely, reveals reckless disregard for the rights of others and infers malice and willful intent entitling the Plaintiff to punitive damages in an amount in excess of \$75,000.00, for the injuries and ultimate wrongful death of Hannah Lannister.

WHEREFORE premises considered Plaintiff demands damages in an amount in excess of \$75,000.00, and punitive damages in excess of \$75,000.00, plus costs and interest and all other relief the Court deems equitable and proper.

By: Harvey Dyke
Harvey Dyke, OBA #100
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222B Baker Street
Winchester, Oklahoma 74661
T: 555/252-1589
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JURY TRIAL DEMANDED!

**THE DISTRICT COURT OF TRAVIS COUNTY
STATE OF OKLAHOMA**

JESSIE LANNISTER, Individually and as)
Personal Representative of THE ESTATE)
OF HANNAH LANNISTER,)
)
PLAINTIFF,)
)
vs.)
)
KAI CONNELLY,)
)
)
)
DEFENDANT.)

CJ-2017-747

ANSWER

Kai Connelly, as Defendant, answers the Petition as follows:

1. Defendant is without sufficient information to admit or deny the allegations in paragraph 1 of Plaintiff’s Petition and therefore denies the same.
2. Defendant admits the allegations in paragraph 2 of Plaintiff’s Petition.
3. Defendant denies the allegations paragraph 3 of Plaintiff’s Petition.
4. Defendant admits the allegations in paragraph 4 of Plaintiff’s Petition.
5. Defendant admits the allegations in paragraph 5 of Plaintiff’s Petition.
6. Defendant is without sufficient information to admit or deny the allegations in paragraph 6 of Plaintiff’s Petition and therefore denies the same.
7. Defendant is without sufficient information to admit or deny the allegations in paragraph 7 of Plaintiff’s Petition and therefore denies the same.
8. Defendant denies the allegations in paragraph 8 of Plaintiff’s Petition.
9. Defendant denies the allegations in paragraph 9 of Plaintiff’s Petition.
10. Defendant denies the allegations in paragraph 10 of Plaintiff’s Petition.
11. Defendant denies the allegations in paragraph 11 of Plaintiff’s Petition.

12. Defendant admits the allegations in paragraph 12 of Plaintiff's Petition.
13. Defendant denies the allegations in paragraph 13 of Plaintiff's Petition.
14. Defendant denies the allegations in paragraph 14 of Plaintiff's Petition.
15. Defendant denies the allegations in paragraph 15 of Plaintiff's Petition.
16. Defendant denies the allegations in paragraph 16 of Plaintiff's Petition.
17. Defendant denies the allegations in paragraph 17 of Plaintiff's Petition.
18. Defendant denies the allegations in paragraph 18 of Plaintiff's Petition.
19. Defendant denies the allegations in paragraph 19 of Plaintiff's Petition.

Following paragraph 19 there is an unnumbered paragraph which does not contain a specific allegation and therefore does not require a response; even so, Defendant denies any allegation contained in the unnumbered paragraph.

AFFIRMATIVE DEFENSES

1. Plaintiff's Petition fails to state a claim upon which they can recover.
2. Plaintiff's alleged damages were the result of an Act of God, for which this Defendant is not responsible.
3. Hannah Lannister's death was the result of pre-existing or unrelated medical, genetic, or environmental conditions, diseases, or illnesses for which Defendant is not responsible.
4. Hannah Lannister was contributorily liable for her death.
5. Hannah Lannister's contributory liability limits or bars any civil remedy.
6. This court shall reduce the amount of damages recovered by Plaintiffs by the sum of the dollar amounts of any and all settlements with potential tortfeasors and Defendant further pleads credit for any and set-offs allowed by the statutory and common law of the State of Oklahoma.
7. Punitive damages are not available based on the facts.

8. Imposing punitive damages on the Defendant would violate due process rights guaranteed by state and federal law.

9. Plaintiff's alleged damages were caused by third parties which Defendant does not control and is therefore not responsible.

10. Defendant reserves the right to further answer and add affirmative defenses as information is revealed through discovery.

Defendant Kai Connely prays this Court deny Plaintiff's Petition and order that Plaintiff takes nothing by way of these claims. Defendant Kai Connely seeks such further relief as this Court deems proper.

Respectfully Submitted,

L.F. Drummond
Leo F. Drummond, OBA #06006
Drummond & Drummond, PC
1606 Main Street
Winchester, OK 74661
ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above Answer was sent via first-class, postage pre-paid, U.S. mail to the following recipient:

Harvey Dyke, OBA #100
Dyke & Associates, PLLC

L.F. Drummond

JURY INSTRUCTIONS

OPENING INSTRUCTION

(To be read by the Judge to the Jurors. These Instructions are NOT evidence which may be read by counsel in open court.)

You have been selected and sworn as the jury to try the civil case of the Jessie Lannister, Individually and as Personal Representative of the Estate of Hannah Lannister versus Kai Connely, which alleges that the Defendant is liable for damages sustained by the Plaintiff due to wrongful death.

I will now tell you the rules that you must follow to decide this case. I will instruct you on the law. It is your duty to follow the law whether you agree with it or not. It is also your duty to determine the facts. You must determine the facts from the evidence produced in court. You should not speculate or guess about any fact. You must not be influenced by sympathy or prejudice. You must not be concerned with any opinion you may feel I have about the facts. You are the sole judges of the facts.

You must take account of all my instructions on the law. You are not to pick out one instruction, or part of one, and disregard the others. However, after you have determined the facts, you may find that some instructions do not apply. You must then consider the instructions that do apply, together with the facts as you have determined them.

DIRECT EVIDENCE DEFINED

"Direct evidence" is the testimony of a person who asserts actual, personal knowledge of a fact, such as the testimony of an eyewitness. "Direct evidence" may also be an exhibit such as a photograph which demonstrates the existence of a fact. It is proof which points immediately to a question at issue and which proves the existence of a fact without inference or presumption.

CIRCUMSTANTIAL EVIDENCE DEFINED

"Circumstantial evidence" is the proof of facts or circumstances which give rise to a reasonable inference of other connected facts.

DIRECT AND CIRCUMSTANTIAL EVIDENCE - WEIGHT

The law makes no distinction between the weight to be given to either direct or circumstantial evidence. You should consider circumstantial evidence together with all the other evidence in the case in arriving at your verdict.

CREDIBILITY OF WITNESSES

It is your responsibility to determine the credibility of each witness and the weight to be given the testimony of each witness. In determining such weight or credibility, you may properly consider: the interest, if any, which the witness may have in the result of the trial; the relation of the witness to the parties; the bias or prejudice of the witness, if any has been apparent; the candor, fairness, intelligence, and demeanor of the witness; the ability of the witness to remember and relate past occurrences, the means of observation, and the opportunity of knowing the matters about which the witness has testified. From all the facts and circumstances appearing in evidence and coming to your observation during the trial, aided by the knowledge which you each possess in common with other persons, you will reach your conclusions. You should not let sympathy, sentiment or prejudice enter into your deliberations, but should discharge your duties as jurors impartially, conscientiously, and faithfully under your oaths and return such verdict as the evidence warrants when measured by these instructions.

BURDEN OF PROOF- GREATER WEIGHT OF THE EVIDENCE

In a civil lawsuit, such as this one, the law provides which party is to prove certain things to you. This is called "Burden of Proof."

When I say that a party has the burden of proof on any proposition by the greater weight of the evidence, or use the expression "if you find," or "if you decide", I mean you must be persuaded, considering all the evidence in the case, that the proposition on which such party has the burden of proof is more probably true than not true. The greater weight of the evidence does not mean the greater number of witnesses testifying to a fact, but means what seems to you more convincing and more probably true.

A party who seeks to recover on a claim or a party who raises an affirmative defense has the burden to prove all the elements of the claim or defense. In deciding whether a party has met the burden of proof, you are to take into account all the evidence, whether offered by that party or any other party.

NO SPECULATION

Your decision must be based upon probabilities, not possibilities. It may not be based upon speculation or guesswork.

EXPERT WITNESS

There has been introduced the testimony of witnesses who are represented to be skilled in certain areas. Such witnesses are known in law as expert witnesses. You may consider the testimony of these witnesses and give it such weight as you think it should have, but the value to be given their testimony is for you to determine. You are not required to surrender your own judgment to that of any person testifying as an expert or otherwise. The testimony of an expert, like that of any other witness, is to be given such value as you think it is entitled to receive.

NEGLIGENCE – DEFINED

Since this lawsuit is based on the theory of negligence, you must understand what the terms "negligence" and "ordinary care" mean in the law with reference to this case.

"Negligence" is the failure to exercise ordinary care to avoid injury to another's person or property. "Ordinary care" is the care which a reasonably careful person would use under the same or similar circumstances. The law does not say how a reasonably careful person would act under those circumstances. That is for you to decide. Thus, under the facts in evidence in this case, if a party failed to do something which a reasonably careful person would do, or did something which a reasonably careful person would not do, such party would be negligent.

DIRECT CAUSE — DEFINITION

Direct cause means a cause which, in a natural and continuous sequence, produces injury and without which the injury would not have happened. For negligence to be a direct cause it is necessary that some injury to a person in [Plaintiff's] situation must have been a reasonably foreseeable result of negligence.

CONCURRENT CAUSES

There may be more than one direct cause of an injury. When an injury is the result of the combined negligence of two or more persons, the conduct of each person is a direct cause of the injury regardless of the extent to which each contributes to the injury.

LIABILITY FOR INCREASED HARM - NEGLIGENCE

If you find by the greater weight of the evidence that [**Defendant**] was negligent and that [**Defendant**]'s negligence was a contributing factor in increasing the harm to [**Plaintiff**] beyond what was due to other causes, then [**Defendant**] is liable for the increased harm.

If you are able to separate the harm that was due to the other causes from the increased harm from [**Defendant**]'s negligence, [**Defendant**] is liable only for the increased harm from [**Defendant**]'s negligence.

But if you are not able to separate the harm that was due to the other causes from the increased harm from [**Defendant**]'s negligence, [**Defendant**] is liable for all the harm to [**Plaintiff**].

[**Defendant**] has the burden of proving by the greater weight of the evidence, which the increased harm from [**Defendant**]'s negligence can be separated from the harm due to the other causes.

DAMAGES FOR WRONGFUL DEATH OF AN ADULT

Jessie Lannister in this action sues to recover damages for the death of Hannah Lannister. If you decide for Jessie Lannister on the question of liability, in determining the amount of damages [he/she] is entitled to recover, you may consider the following items:

1. The loss of financial support of contributions of money to the parents of Hannah Lannister;
2. The grief of the parents of Hannah Lannister;
3. The loss of the companionship of Hannah Lannister by her parents;
4. The pain and suffering of Hannah Lannister;
5. The medical and burial expenses.

You must fix the amount of money which will reasonably and fairly compensate for those above-named elements of damage, which you find were directly caused by the wrongful conduct of Kai Connely.

DAMAGES FOR WRONGFUL DEATH OF A MINOR CHILD

Jessie Lannister in this action sues to recover damages for the death of Hannah Lannister, a minor child. If you decide for Jessie Lannister on the question of liability, in determining the amount of damages [he/she] is entitled to recover, you may consider the following items:

- a. The medical and burial expenses;
- b. Loss by the parents of anticipated services and support;
- c. Loss by the parents of companionship and love of the child;
- d. Destruction of the parent–child relationship;
- e. Loss of monies expended by the parents in the support, maintenance and education of Hannah Lannister;

You must fix the amount of money which will reasonably and fairly compensate for those above-named elements of damage, which you find were directly caused by the wrongful conduct of Kai Connely.

EXEMPLARY OR PUNITIVE DAMAGES- FIRST STAGE

If you find in favor of Jessie Lannister, and grant [him/her] actual damages, then you must also find by a separate verdict, whether Kai Connely (acted in reckless disregard of the rights of others) (and/or) (acted intentionally and with malice towards others).

Jessie Lannister has the burden of proving this by clear and convincing evidence. By that I mean that you must be persuaded, considering all the evidence in the case, that the proposition on which the party has this burden of proof is highly probable and free from serious doubt.

The conduct of Kai Connely was in reckless disregard of another's rights if Kai Connely was either aware, or did not care, that there was a substantial and unnecessary risk that [his/her] conduct would cause serious injury to others. In order for the conduct to be in reckless disregard of another's rights, it must have been unreasonable under the circumstances, and also there must have been a high probability that the conduct would cause serious harm to another person.

Malice involves either hatred, spite, or ill-will, or else the doing of a wrongful act intentionally without just cause or excuse.

If you find that Kai Connely acted (in reckless disregard of the rights of others) or (intentionally and with malice towards others), you may award punitive damages against Kai Connely in a later part of this trial. If you find that Kai Connely did not act (in reckless disregard of the rights of others) or (intentionally and with malice towards others), you may not award punitive damages against Kai Connely.

ELEMENTS OF LIABILITY- INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

For Jessie Lannister to recover from Kai Connely on [his/her] claim for intentional infliction of emotional distress, [he/she] must prove by the greater weight of the evidence that:

1. Kai Connely's actions in the setting in which they occurred were so extreme and outrageous as to go beyond all possible bounds of decency and would be considered atrocious and utterly intolerable in a civilized society; and
2. Kai Connely intentionally or recklessly caused severe emotional distress to Hannah Lannister beyond that which a reasonable person could be expected to endure.

INTENTIONALLY AND WILLFUL DISREGARD- DEFINED

Kai Connely intentionally caused emotional distress to Hannah Lannister if [he/she] desired to cause such distress or knew that such distress was substantially certain to result from [his/her] conduct.

Kai Connely recklessly caused emotional distress to Hannah Lannister if [he/she] knew there was a substantial probability that emotional distress to Hannah Lannister would result from [his/her] conduct, and [he/she] deliberately disregarded that probability.

EMOTIONAL DISTRESS OR PAIN OR ANGUISH- DEFINED

The term "emotional distress" means mental distress, mental pain and suffering, or mental anguish. It includes all highly unpleasant mental reactions, such as fright, horror, grief, humiliation, embarrassment, anger, chagrin, disappointment, and worry.

STATEMENT OF CAMERON MYERS

1 My name is Cameron Myers and I am the athletic trainer for Winchester High School. I have been
2 the athletic trainer at Winchester High School since 2012. I am a certified athletic trainer and received my
3 undergraduate degree in athletic training at the University of Florida. I received my certification through
4 the Board of Certification (BOC) in May 2005.

5 As an athletic trainer, I am a healthcare professional licensed by the State of Oklahoma, working
6 under the supervision of a physician, to provide injury and illness prevention, emergency care, examination
7 and diagnosis of injuries. I also participate in rehabilitation of injuries for my athletes. My responsibilities
8 include attending all practices and games to provide treatments before and after practice and games, and
9 also am on the sidelines to provide emergency care for injuries.

10 I am CPR certified. I also conduct office hours at the school every day so student athletes can
11 schedule times to discuss issues or injuries with me or to check on any rehabilitation plans they may be on.
12 Under the supervision of my physician, we also conduct physicals on the student athletes before the season
13 starts to set a baseline condition and to identify potential issues or concerns that might affect the student's
14 ability to participate in a particular sport.

15 I personally knew Hannah Lannister as she was a student athlete on the Winchester basketball team
16 in the 2016 season. Although I had been at Winchester since 2012, I did not know Hannah very well prior
17 to the start of the 2016 basketball season as she has not been an athlete in any other sports since I had been
18 at Winchester. She had been the basketball manager the year before, but I did not have much, if any,
19 interaction with her. She was fairly quiet and kept to herself. Hannah was a good basketball player.

20 When you spend as much time as I do at practices and games, you definitely get an eye for talented
21 athletes and Hannah was talented. She was one of those athletes that worked hard to hone her skills, it was
22 not something that came easy to her. Hannah was a junior in the 2016 basketball season and although it
23 was her first year to play, she earned a spot on the starting lineup.

1 I admit not everyone was excited about Hannah's place in the starting lineup. Her taking the spot
2 from another girl on the team caused some issues on and off the court. You have to understand, I am around
3 these students a lot in the training room and they get so used to me being in the room that they talk like I'm
4 not even there. So yeah, I hear a lot of stuff. Some of it turns out to be true and some is just high school
5 gossip. You would be shocked by the things some of these kids talk about!

6 That season, I did overhear some kids make comments about Hannah, about how she did not fit in
7 with the team and did not deserve to be a starter, but I never saw firsthand anyone say anything directly to
8 Hannah or I would have reported it to the coach or the school administration. I heard one rumor that some
9 kids snuck into the locker room and put a bunch of trash in Hannah's locker before a game, but I did not
10 see it and when I asked Hannah about it, she just brushed it off and told me it was just a rumor.

11 Hannah seemed to struggle with the rigors of the basketball schedule, there is a lot of practice and
12 conditioning and the sport requires a lot of time for the players – especially the starters. There is daily
13 practice plus conditioning four days a week. In the weeks before her death, Hannah seemed fatigued, she
14 was lagging a bit during practice. I approached her about it and she told me she was fine, that she was just
15 having a hard time juggling schoolwork and the demands of playing at the varsity level on the team. I
16 looked at her chart from her pre-season physical and there was no family history of any health or heart
17 conditions. I specifically talked to Hannah and she did not report to me any complaints of chest pain or
18 abnormally high heart rate so I did not sit her out from playing.

19 There was an incident at basketball practice during the 2016 pre-season, I did not see what happened
20 because I had taken another student athlete to the training room for treatment but when I came back into the
21 gym, Hannah was sitting on the bench and the rest of the basketball team was doing suicide drills. I never
22 heard what really happened, but there was a lot of gossip about her size going around after that incident.

23 Looking back, I realize now that Hannah was also spending a lot of extra time in the training room,
24 she would come in alone and bring her lunch or just spend her free period there. I did not think much of it
25 at the time as a lot of other student athletes would come in during their free period as well. Hannah would
26 sit by herself and I assumed she was just wrapped up in school work or something.

1 On the night of November 11, 2016, the Danes were playing a rival team and Hannah seemed
2 troubled in the warm up, I would describe it as unfocused. Because of this, I kept a close eye on her during
3 the game. She played okay and I did not see any medical issues during the game that concerned me at all.
4 After the game was over, I was following the team into the locker room when I heard a scream, I'm not sure
5 who screamed, but as I ran into the locker room, I saw Hannah lying on the ground in front of her locker.
6 The locker was open and I could see a noose hanging in the locker with a stuffed animal with Hannah's
7 jersey number written on it. I immediately turned my attention to Hannah and ran over to her. She was not
8 responsive, was not breathing spontaneously, and had no pulse. When any athlete collapses and is
9 unresponsive, the protocol is to assume they are in sudden cardiac arrest until proven otherwise.

10 I immediately started CPR and yelled for the coach to activate the Emergency Action Plan (EAP).
11 The EAP is designed to assist in emergency situations and once it's activated, we have personnel in place
12 who notified emergency medical services to respond to the scene. Winchester High School did have an
13 Automated External Defibrillator (AED) device onsite so I continued manual CPR until the AED was
14 brought to me. I applied the AED electrodes to Hannah's chest. Once the AED was in place and analyzed
15 her heart rhythm, the AED twice prompted for shock delivery, which I did. There was no sign of circulation
16 after either shock delivery. Once the paramedics arrived on scene, they took over Hannah's care. Hannah
17 never regained consciousness. I heard later that she was pronounced dead once they arrived at the hospital.

18 Sudden cardiac arrest is the leading cause of death among exercising young athletes, due to an
19 underlying and usually undiagnosed cardiac abnormality or condition, but this was the first time I had ever
20 seen anything like this. It is difficult to prevent as many athletes have no symptoms until the cardiac arrest
21 occurs. There was not anything in the family history, physical, or observation of Hannah that led me to
22 believe she had any cardiac condition that would lead to a sudden cardiac arrest. If Hannah had shown any
23 symptoms such as chest pains, lightheadedness, shortness of breath, or heart palpitations, I would definitely
24 have kept her from playing basketball. No game is more important than a student athlete's life.

25 This was a tragic incident. There are frequently news stories about young athletes dying from
26 sudden cardiac arrest, but it is different when it happens to your student athlete. I am devastated for Hannah

1 Lannister's family, but I do not agree with this lawsuit. I do not think Hannah Lannister was bullied so
2 much that she died from it. Also, it is my opinion that Hannah died from sudden cardiac arrest caused by
3 an underlying medical condition.

I have given this affidavit of my own free will and certify that my statements are the truth and I have nothing more to say.

Cameron Myers
Cameron Myers

STATEMENT OF KAI CONNELLY

1 My name is Kai Connely and I did nothing wrong. Hannah Lannister was a friend of mine,
2 not a close or good friend, but a friend still. Besides, we were just kidding around mostly.
3 Everything we did was something we each had experienced ourselves. It was just teasing, mostly.
4 We all liked Hannah.

5 I've known Hannah since grade school, and if I ever saw anything like this coming, I really
6 believe I would have tried to do something about it. It's so sad – Hannah had always been a super
7 smart, nice, quiet girl who mostly kept to herself, at least as much as I could tell. I remember that
8 Hannah was always into “geeky” things, and I don't mean that in a mean way, but traditionally
9 geeky things, like arguing on the debate team and school politics and stuff. Definitely stuff that
10 my friends and I were never interested in. I really only started to hear about her when she was the
11 basketball manager in 2015 and some of my friends would occasionally talk about her.

12 In our high school being a basketball manager isn't exactly a high mark of popularity.
13 Some of my friends said mean stuff about her behind her back and now that this has all happened,
14 I can't help but feel terrible about the way they might have treated her. I've always had lots of
15 anxiety about people talking behind my back in the halls, or after school, and this situation doesn't
16 exactly make me feel any more secure. But, I know I was mostly nice to Hannah our sophomore
17 year and I don't remember any of my friends ever having any problems with her at all.

18 The first significant thing I can even remember about Hannah since we've been in high
19 school, other than the whole memorial concert incident, was that she took my friend's spot on the
20 basketball team right after practice started that year. She came back her junior year and was
21 suddenly a really good basketball player. She ended up making the varsity team. Hannah making
22 the team pushed my friend off the team and it upset me. I didn't like her because of that, but I
23 never wanted her to die.

1 Long story short, I guess Hannah decided she wasn't happy handing out water and sitting
2 next to the coach. My friend was a real basketball player and had been playing basketball for most
3 of her life. She cared about basketball and the way Hannah just waltzed onto the team and took
4 that from her was so unfair. Hannah didn't have to do anything to earn her spot on the team other
5 than get lucky with freak genetics or some unnatural help.

6 But even after that, I believe I tried to be supportive of Hannah, eventually. I gave her
7 some workout equipment because I knew she wouldn't have any of that, since she just started
8 playing basketball that summer and all. I mean it when I say that I never did anything mean to
9 Hannah directly for her stealing my friend's spot – I was very good about that in my opinion. I
10 know that a noose was found in her locker and that it was the same type of material that I gave her,
11 but I do not know anything about the locker stuff. I didn't do that.

12 Other than the basketball situation with my close friend, Hannah did embarrass herself in
13 front of the whole school with some memorial concert idea. It was such a big ordeal she probably
14 had people outside of school bringing it up – just regular people in Winchester would have heard
15 about this. A couple of years ago, as everyone and their mom already knows, Alex Snow from
16 Heisenburg got murdered and it was a really big deal. Well, apparently it was a bigger deal to
17 Hannah than most people because she tried to arrange this ridiculous “memorial concert” for Alex.
18 Really?? People thought she was just trying to hog attention and play victim – she said it was
19 because she was at the concert and because she really liked the band, but people saw through that.
20 I think she had a crush.

21 She created flyers, which everyone threw away, she started a webpage and tried to get
22 sponsors, which no one liked or helped. In reality, everyone around here liked the band, but they
23 were more popular outside of Winchester than they were in Winchester and besides, it was some

1 rich spoiled kid in a band, who cares? The band had better ties to Wheatville, that poor excuse for
2 a “town” out somewhere east of us. Hannah seemed like she was doing it for attention and it
3 backfired severely. If I had to guess, I’d say that’s probably what caused the most stress for her.
4 It certainly got her a bunch of attention from the students at Winchester.

5 After the memorial concert incident, lots of people were really mean to Hannah on RDEX.
6 I’m not sure if I said anything on there, but I’m sure if I did it wouldn’t have been anything bad.
7 We all believed Hannah was laughing along with us, but it’s obvious now that she was taking some
8 of the stuff people were saying on there to heart. Look, every student catches some teasing growing
9 up through school. Its just part of what happens.

10 If her family wants to say that I bullied her, then they need to look around and see all the
11 other people who said mean things to Hannah. I really take this situation personally – people have
12 been horrible to me ever since this happened and I am starting to think that people are blaming me
13 just because of this whole lawsuit and what her family has started saying about me.

14 When I heard about what happened to Hannah, I was extremely sad. But I never would
15 have imagined that somebody would ever try to blame me for what happened. Nobody can make
16 somebody drop dead from a heart attack and I never meant for anything really bad to happen.
17 Show me the messages or whatever evidence where I said something so terrible that someone
18 would just fall over dead like that, and then we will talk. Besides that noose in her locker did the
19 most damage apparently.

20 Yes, I did give her some paracord. Its like rope, but we just used it to pull or drag weight
21 for training or carrying supplies when climbing. I thought it would help her get in shape for
22 basketball. I firmly believed that the paracord was something she would need, most of the team
23 used some kind of rope or cord for exercise and weight training. I have plenty of other paracords

1 that I can use for whatever it is I have used them for. I've mostly used them for climbing or
2 exercise, but these things are useful for all types of different things. I'd be happy if somebody
3 gave *me* some solid strength paracord. Yes, I did tell her it would hold more weight and that she
4 could probably hang from it and it would not break, but that was in reference to pulling weight.
5 Hannah was bigger and stronger her junior year and everyone saw the change. I know some people
6 referred to her as the Hulk and I thought she liked the reference-which is why I used it. I did send
7 her messages on her phone and through RDEX, but nothing I said was worse than what others were
8 saying.

9 This whole thing has had a really bad impact on me and all my friends, and honestly, I just
10 want to put this situation behind me and learn from it. My parents have already punished me
11 enough for apparently being mean, I am suspended from school until this resolves, and it would be
12 totally unfair to blame me for everything that happened to Hannah. After these events, there just
13 isn't any fun in being in high school anymore. The teachers treat us all like we are a bunch of
14 criminals and look at me specifically like I'm the grim reaper.

15 I am just so sorry for my fellow Raiding Danes, that we are living through this tragedy. I
16 can't believe this is happening to me.

I have given this affidavit of my own free will and certify that my statements are the truth
and I have nothing more to say.

Kai Connely
Kai Connely

STATEMENT OF VAL GRAY

1 My name is Val Gray and I am the principal at Winchester High School. I personally knew
2 both Kai Connely and Hannah Lannister as they were students of mine for a couple of years. Like
3 everyone, I was completely shocked by Hannah's death. As educators we prepare for so many
4 things, but nothing truly prepares you for the loss of someone so young. Hannah was a bright and
5 determined young woman, and I had thought that she was really coming into her own at the
6 beginning of her junior year – she rose from being a manager to making the varsity basketball team
7 and had lobbied the student body and administration to put on a memorial concert for Alex Snow,
8 a popular musician with Oklahoma ties who had passed away. Hannah was a big fan and seemed
9 to take that death personally. Although the concert fell through, I was impressed by her efforts.
10 Some of her classmates, however, were relentless in teasing her about it. Hannah reported receiving
11 bullying messages on RDEX, and I initiated an investigation per our school policy. As part of my
12 investigation, I reviewed Hannah's report, spoke with her teachers and coaches, and reviewed her
13 messages on RDEX – Raising Danes Idea Exchange.

14 RDEX was a social media app designed for our students and staff to stay connected with
15 each other and with the greater Winchester High community. Students and staff members can make
16 schoolwide posts or send messages through RDEX. This provided a wonderful forum for
17 collaboration and discussion, but like any other platform, it could be abused. Messages on RDEX
18 were not actively monitored in real time, but students were encouraged to report any inappropriate
19 messages they receive. All messages were saved on our servers and students were notified that the
20 messages are subject to review by the school administration at any time.

21 In reviewing Hannah's RDEX messages, I found messages regarding the character Hulk
22 from Marvel. Apparently, some students were identifying Hannah as the Hulk because she had

1 changed so much over the summer and was an athlete her junior year. The references to watching
2 out for a “H smash” referred to Hannah, not the Hulk. I’ve now seen text messages about Kai
3 wanting to have a memorial game for Hannah next year. This was apparently in sarcastic reference
4 to Hannah’s failed attempt for the memorial concert. Some of the worst messages involved direct
5 references to the team being better without Hannah, and having won the first few games last year-
6 when Hannah was not on the team. I think I saw a text message that Alex Snow was a better
7 basketball player than Hannah during the 2016 season. Obviously, everyone was aware that Alex
8 Snow had passed away and Kai’s meaning was a thinly veiled insult of a shameful nature. This
9 type of exclusionary language can be very damaging to a person, especially to a young adult.

10 At the time, the RDEX messages did not reveal the whole truth about the level of
11 inappropriate behavior that was happening. Only once text messages from Hannah’s phone are
12 seen in conjunction with the RDEX messages, can the cumulative impact of the conduct begin to
13 be appreciated. My focus was only on the RDEX part of this conduct as Hannah’s personal phone
14 was not within the school’s investigational jurisdiction. We may revise this policy moving
15 forward, but I did not look at any personal phones during my investigation.

16 The RDEX messages alone clearly did not reflect the way we expect Winchester students
17 to interact with one another, and by themselves justified disciplinary action against Kai. After
18 Hannah’s death, I learned of the incident with the stuffed animal in her locker hanging by a noose
19 and decided to suspend Kai pending the results of any legal action. I do not know for certain if
20 Kai placed the noose, but Kai was probably involved. I hate to say that about a student, but there
21 was so much going on from Kai to Hannah that I was not aware of at the time. My investigation
22 was limited to evaluating whether school rules were broken – I am not a doctor or a law

1 enforcement official and I certainly am not qualified to determine the cause of Hannah's death, but
2 Kai's actions were absolutely inappropriate.

3 It is nearly impossible to be proactive on every front facing school administrators and
4 teachers today. Our jobs are to educate students, but in today's world of violence, abuse, and
5 scarce public funds, we are having to try to be many things for everyone with little support.
6 Teachers must be educators, monitors, therapists, security guards, investigators, protectors, baby-
7 sitters, the list goes on and on. We are trained to educate our students, but we are not equipped to
8 solve all their problems or to replace their parents.

9 This is especially true in our state, where despite being expected to handle a dozen different
10 professions, and to handle them effectively, our teachers are among the lowest paid in the country.
11 This leads to veteran teachers leaving for better-paying jobs in other states, while our schools
12 struggle to find qualified replacements for them. I challenge anyone to take on the challenges our
13 teachers deal with every day and see how long they can last.

14 The difficulties we face have been compounded by the steady increase in class sizes.
15 Winchester is located just east of OKC and has become nearly indistinguishable from our
16 neighboring city with development approaching each other. The expansion of the metro area over
17 the last 10 years has led to a growth in the student population which has greatly outpaced the
18 growth of our staff. As classes grow larger, teachers are less able to develop the kind of one-on-
19 one connections that would enable them to identify when bullying occurs outside of the classroom.

20 Did we miss signs that Hannah was suffering from Kai's bullying? Looking back, I would
21 say yes, but we do the best with can with the resources we get. It is easy to look at the surface of
22 a student's life and miss the conflicts within. It is clear now that though Hannah put on a brave
23 face, she was dealing with more stress than she could handle. Since Hannah's death, I have decided

1 to shut down RDEX and have made it my mission to make sure that every Winchester student
2 knows that help is available to them, and if the victims of bullying seek help it will remain
3 confidential. We are also revamping our efforts to address bullying on social media. The Lannister
4 family has been devastated. The Winchester community has been devastated. My only hope is that
5 from this tragedy is that other students will know there are people who are struggling and that they
6 don't need to suffer in silence.

I have given this affidavit of my own free will and certify that my statements are the truth
and I have nothing more to say

Val Gray
Val Gray

STATEMENT OF JESSIE LANNISTER

1 My name is Jessie Lannister and Hannah Lannister is my daughter. I am sure you may
2 recognize my name, and I will let you know, it is not déjà vu. I recently retired from the OKC
3 Police Department, and I served as the lead investigator for the death for the lead guitarist of
4 Heisenburg. After spending an extensive amount of time and effort on that high-profile case, I had
5 planned on enjoying my retirement by spending time with my family, taking many vacations left
6 on my bucket list, and focusing on my new-found passion for photography, but this dream came
7 to a screeching halt with the horrifying death of my baby daughter. Hannah was the youngest of
8 my children, and she was the light in the darkness.

9 As you can imagine, through my history of investigating gruesome murder scenes, serving
10 in the Marine Corp, and growing up in inner-city Detroit, I have had my share of hard times.
11 However, no matter how rough it got working for OKC, my sweet Hannah was always there with
12 a smile and knew just exactly what to say and do to cheer me up. Her smile would light up the
13 room, and I cannot even begin to describe the feeling I would get when she jumped into my arms,
14 hugged me with all her might, and told me she loved me. Unfortunately, my life path has now
15 changed, and there is a hole that can never be filled. Instead of traveling around the world snapping
16 photos of nature and artifacts, my desire is now focused on educating young adults on bullying. I
17 have reached out to all the local bullying prevention organizations, and I want Hannah's story to
18 be told. No family or father should have to experience the death of a child.

19 Since I was with the Oklahoma City Police Department for thirty-three (33) years, I've
20 seen things that no one should ever have to see and have investigated scenes involving suspected
21 suicides, deaths and murders. I've had to inspect these crime scenes with immaculate detail and
22 put together thorough reports of the investigation. I've seen the horrible consequences of domestic

1 violence, stupidity, carelessness, hate, jealousy, and revenge; the worst things people can do to
2 each other. But this, Hannah's passing, is the worst of all. She didn't do anything to hurt anyone.
3 She was bullied and teased by a bunch of privileged, jealous monsters with no compassion for
4 others or human decency within them.

5 I am a person of faith, and only my reliance on faith has gotten me to this point, but I have
6 so many questions about this world and why horrible things happen to good people. I understand
7 teasing students is part of being a teenager. Heck, my dad was a hard-working factory worker that
8 made me work hard and even gave me a paddling when I was out of line. The Marine Corp was
9 also no fairy tale either. But, teasing and instilling hard-work in a person is different than harassing
10 an innocent, young woman so much that her heart gives out. A kid should never be tortured for
11 putting forth unparalleled effort, working to improve her life and reaching a set of goals that she
12 has wanted ever since she was a toddler!

13 I remember as though it was yesterday. My Hannah reached out for my advice while we
14 were watching our beloved Thunder during the playoffs. It was nearing the end of her Sophomore
15 year, and Hannah was looking ahead to her Junior year. She wanted it to be bigger and better than
16 ever. Other than the debate team and her academics, Hannah was a devout basketball fan. If we
17 weren't watching Thunder games, we were playing a pick-up game of HORSE or shooting hoops
18 in our front drive way. Hannah was ruthless when it came to playing basketball, and she did not
19 let her older siblings or myself push her around or take it easy on her. It was her goal to one day
20 play on the high school basketball team, and she wanted us to help her reach that goal.

21 Unfortunately, nature was against her. Height was not something that was in our genetics.
22 So, before her sophomore year of high school, Hannah decided to help as a manager and not tryout.
23 But, by the end of her sophomore year Hannah was tired of watching from the sidelines and ready

1 for a change. Therefore, Hannah knew she was going to have to work tireless hours in order to
2 reach her goal and make the basketball team. Alright, I digress, I know, I know, you want to know
3 about my interaction with Hannah while we were watching the Thunder playoff game.

4 While Hannah and I were sitting on the couch, she looked at me with a disgruntled look on
5 her face, and every time I close my eyes, I have a clear picture of her face and the words that
6 followed. “Dad, I’m never going to be more than a basketball manager, and I’m never going to
7 make the basketball team.” Before, she could say another word, I immediately jumped off the
8 couch and made it clear I never wanted to hear those words from her mouth again. I continued on
9 with a tirade about how the Lannisters do not fail, and if we have a goal in mind, we reach that
10 goal. Even though she had heard the stories many times, I went through our family history of hard
11 work and paying our debts-always. My lengthy talk about hard work and achieving goals was
12 motivating my sweet Hannah. It made me cringe, but I turned off the television while the Thunder
13 were mounting a comeback. But, I knew there were more important things at hand. I got Hannah
14 off the couch, and we went straight outside to practice her basketball skills.

15 We worked hours after hours and as the sweat poured down our foreheads, we knew if
16 Hannah continued this hard work, she could meet her goal of making the basketball team. After
17 the hours of practice Hannah put in that night, we sat down at the kitchen table and made a
18 comprehensive list of specific goals, such as taking 500 shots, and dribbling back and forth in the
19 driveway for at least an hour, Hannah needed to complete each day. After fine tuning the list, we
20 laminated copies and placed them throughout the house. Yep, as you guessed it, the final goal in
21 big bold letters at the bottom of the list was: **MAKE THE BASKETBALL TEAM.**

22 The following morning, Hannah woke-up before sunrise, and I could hear the basketball
23 dribbling in the drive-way before I could even get my morning cup of coffee. Of course, I joined

1 her and made sure to encourage her every step of the way. As I had hoped, Hannah continued to
2 work hard, and we started to see improvements. At some point, we decided to get her private
3 lessons and her skills continued to improve.

4 Summer had passed, the end of fall was approaching, and those laminated lists around the
5 house had been marked-on and crossed-out, except for the remaining all important final goal.
6 Tryouts for the basketball were about a month away, and Hannah did everything she could do to
7 make sure she made it. I know I am the biased parent, but I cannot even begin to describe the
8 immense improvement Hannah had made. To validate my thoughts on her improvement, her
9 trainer would not stop talking about how much she improved. I tried not to get my hopes up, but
10 making the team seemed all but inevitable.

11 The day had arrived; it was tryouts. It was time to put all that hard work and effort to the
12 test. I am sure as you could imagine, I can go on and on about the tryouts. Instead, I will save that
13 story for another day, but let's just say, drum roll...Hannah did amazing, and she made the team!!!
14 It was one of the proudest moments in my life. As soon as they announced the basketball squad,
15 Hannah had a grin from ear to ear and was fighting to hold back the tears. At the time I didn't
16 really think anything of it, but some of the other students seemed upset and looked down on Hannah
17 and made some inappropriate comments to her. I figured it was just banter for a new member
18 among competitors, but looking at what would transpire over the next few months, those students
19 meant what they said and had this look as though they were really jealous of how much her skills
20 improved. Unfortunately, I would later find out that this behavior would continue, and it only got
21 worse.

22 One of the more disturbing events involved Kai Connely giving Hannah some cord or rope
23 to help her workouts and training. That was the same stuff that took her life. I think Kai Connely

1 was really bothered by Hannah's inclusion on the team because some other player was supposedly
2 excluded by Hannah's inclusion. Which seems really weird, I didn't realize high school basketball
3 teams were limited in spots. Worse yet, I think Kai Connely put a noose made from that same cord
4 in Hannah's locker! The noose was unquestionably the same stuff that Kai gave Hannah. Who
5 else would have that material or the motivation to do such an act? I mean, its high school
6 basketball! A state title would be an amazing accomplishment, but they're not playing for the world
7 title! The team is not worth a life.

8 Honestly, at the time, I noticed some bad body language between Hannah and some of her
9 teammates, but I would unfortunately not learn until later the level of bullying towards Hannah. I
10 probably should have suspected more when Hannah was named the starter and instead of being
11 extremely happy, she was quite the opposite and honestly did not like talking about it. I should
12 have pressed her further, but figured she was going through normal teenage stuff. Also, around
13 that same time, Hannah had talked with some of her friends about putting together a memorial
14 event for her favorite band member, Alex Snow, of Heisenburg who had died a couple of years
15 prior. However, she was not enthused about the event or playing basketball; I could tell something
16 was really bothering Hannah, and her plans were not going well. She was not the same hard-
17 working person who had spent the entire summer training hard and improving. She was no longer
18 walking around with the biggest smile on her face.

19 I knew Hannah was very upset by the death of Alex Snow, the guitarist for Heisenburg, in
20 2014, but I felt it was more than Alex's death that was causing Hannah to not be in a good mood.
21 Hannah had followed the band's growth for several years. I did not know it at the time, but she
22 was actually at the concert at The Rising Sun on November 2, 2014. She stayed with a friend that
23 night and did not know anything about the situation overnight. I investigated that incident and

1 probably did not do a very good job of separating work from home life as Hannah and I talked
2 about it often for months. Even though Hannah tried to organize a memorial event at Winchester,
3 a couple of years after Alex Snow's death, nothing ended up happening. I know she was really
4 upset by what other students were saying about her idea. I never realized how bad it was. I should
5 have known. I should have seen the signs. Looking back, I hate myself for not putting the pieces
6 together and seeing that Hannah needed help, especially because I could see a completely different
7 change in her behavior.

8 Nearly every day, I would ask how her day was and I never heard bad things. That response
9 appeared to be nothing more than a front. Sure, there was some difficult conversations and I never
10 liked how much access students had to each other through that RDEX app. I never thought her
11 phone would cause such problems. I thought she just turned it off at night. Since she passed, it
12 became clear why her behavior had drastically changed, and I've seen the horrible things that kids
13 were saying about her and to her. It was relentless. It was brutal. Coming from someone that had
14 investigated some of the most horrific crimes, it made me cringe.

15 I had never seen anything like what kids were saying to each other. I was teased growing
16 up, I think most adults were, but years ago the comments stopped at the end of the school day. I
17 am from a blue-collar neighborhood in Detroit and every kid took their share of knocks growing
18 up there. But we could get away from it. Now, it can be a twenty-four hour onslaught of bullying
19 and teasing. I should have known what was going on. Hannah was brilliant, athletic and such a
20 great student. She was going to change the world. Instead, around the time of her death, she did
21 not act like it. It was difficult to see this drastic change in her, and I blame myself every day for
22 not talking to her about it.

1 Our family was completely destroyed by Hannah’s passing. My spouse, Trace, left soon
2 after the funeral and Hannah’s older sister went back to her life in Black Mountain, North Carolina
3 with her family. Her brothers have their own lives and aren’t around much. As far as I know, no
4 one has been on our basketball court since her passing, and we have not watched any Thunder
5 games together. I rarely talk to them now because every conversation brings overwhelming pain.
6 I can’t describe the deep soul-crushing sorrow I still feel every time I think of having to bury my
7 child.

8 There are daily reminders everywhere and her loss will be with me forever. I’ve given up
9 photography since that was something Hannah and I used to do together. I can’t even look at any
10 of the photographs we took that year, 2016. I can’t watch Thunder games because one of the last
11 outings we had as a family was the November 7th home game against Miami. The Thunder won,
12 and the family had a blast that night. While it has had a significant impact on our lives, I vow to
13 educate our youth on the awfulness of bullying.

14 Our teens need to know the impact bullying can cause, and there are people out there that
15 can help and that want to help. There are numbers that can be called or texted 24-hours a day:
16 #741741. The 741741 number, www.crisistextline.org, connects texters to a crisis counselor
17 immediately to help work through intense moments by active listening and collaborative problem
18 solving. There is an entire website dedicated to stopping bullying: www.stopbullying.gov and
19 there are many resources available on that site for students, parents, teachers, and school
20 administrators.

21 I only wish someone had mentioned these resources earlier. I mistakenly thought talking
22 about something so serious could increase the risk of something bad happening, but I have learned
23 that engaging and discussing these types of issues with our youth can be productive and beneficial.

1 I would trade anything for the chance to go back and have a conversation, even if difficult at the
2 time, because this rare alternative is preventable and terrible. Hannah was like any other person
3 and it is a shame her life story came to this end.

I have given this affidavit of my own free will and certify that my statements are the truth and I have nothing more to say.

Jessie Lannister
Jessie Lannister

STATEMENT PENN EVERETT, MD

1 My name is Penn Everett, and I am a doctor retained in this case on behalf of the Plaintiff.
2 I received my doctorate in 1990 from Canyon Ridge University. I ran a clinic for seven years and
3 then transitioned into teaching and research. Since 2011, I have been a Professor and the Lead
4 Researcher for Canyon Ridge University's School of Medicine. Much of my focus has been on
5 the effects of stress on the human body from both an emotional and physical impact. Pertinent to
6 the pending case, I have done some research on the effects of stress on the heart and my conclusion
7 that Hannah died due to the actions of Defendant is based and supported by my professional
8 research and experience.

9 I have published hundreds of papers and articles in several national journals. Specifically,
10 the Journal of Social & Clinical Medicine and the Journal of Family Psychology and Stress. While
11 I do not have formal education in Psychology per se, much of my professional experience has
12 overlapped with that field and I am confident in my assessment of some of the psychological
13 aspects involved in this matter. Also relevant to this case, I have researched bullying and the
14 impact on people. In fact, just last year, 2017, I received the Award for Lifetime Contributions to
15 Bullying Research from the American Association for Anti-Bullying. Obviously, there was
16 bullying involved in the time period preceding Hannah's death and that conduct played a
17 significant role in the tragic outcome.

18 My report provides the full details of my opinions in this matter, but I did review the
19 following information in preparing my report: Hannah Lannister diary, the autopsy report, text
20 messages, two forms from Winchester High School, select RDEX posts and the report of Drue
21 Ellis- Defendant's hired expert. Dr. Ellis was retained on behalf of the Defendant and the

1 conclusion of a natural death is therefore questionable. As set out in my Report, I have sufficient
2 publications and certification to qualify as an expert in this case.

3 I offer the conclusions in my Report, but specifically state here that Hannah Lannister died
4 as the result of the actions of Kai Connely. Specifically, Kai Connely's conduct leading up to
5 November 11, 2016 and the presence of the noose, having been placed by the same person, caused
6 a heart attack due to stress. There is sufficient medical evidence of stress before and at the time of
7 Hannah's death for that to be the only reasonable conclusion.

8 The autopsy involved opening the body to examine internal organs, structures, and related
9 anatomy, focusing specifically on the heart. As recorded in that report, that is medical support for
10 a stress heart attack. The shape of the heart was distorted as noted. The distortion is caused by the
11 increased levels of stress and reaction by the body.

12 As seen in the diary entries, Hannah was very affected by the bullying from Kai Connely.
13 Just because this adverse impact was not observable to outsiders, the results are there. I believe
14 there may have been distortions to her heart before November 11, 2016. However, not until the
15 noose was seen, was Hannah's body overwhelmed by the stress. Please refer to my report for more
16 information on my opinion.

I have given this affidavit of my own free will and certify that my statements are the truth
and I have nothing more to say.

Penn Everett

PENN EVERETT

STATEMENT OF DRUE ELLIS, Ph.D.

1 Good afternoon, my name is Drue Ellis. I have been involved in the medical field since
2 1978, nearly forty years now. Unlike Penn Everett, I have a degree in Psychology and I am
3 qualified to incorporate aspects of that discipline into my opinion. I have been retained on behalf
4 of the Defendant, but my opinions are based strictly on my own investigation, my independent
5 review of the relevant materials and my professional experience. I have not been influenced or
6 directed by anyone associated with this case. I believe my conclusion is supported by the evidence
7 and information gathered to date. The incident in question was the result of naturally-occurring
8 conditions and not the actions of any particular person.

9 I am aware that Penn Everett disagrees with my opinion, but my conclusion is supported
10 by industry research and the available evidence. I believe she had several undisclosed,
11 undiagnosed, and therefore untreated, factors going on in her life that increased her risk for Sudden
12 Unexpected Death. While I obviously cannot say for certain, I strongly believe that had others
13 known about her underlying risk factors, proper intervention may have resulted in a different
14 outcome.

15 I completed my initial course of higher education at the University of Cornwell in 1976,
16 having obtained a bachelor's of science with a minor in English Literature. I started medical school
17 two years later and was accepted into a multi-year clinical internship before graduating. In 1983,
18 I completed coursework through the Medical School at the University of Cornwell. For the next
19 twelve (12) years, I ran my own clinic with offices in Vancouver, British Columbia, Canada and
20 Dallas, Texas. In 1995, I accepted a teaching position with the Department of Physiology at the
21 University of Southern Pangea. I have always loved teaching and being in education has allowed
22 me to engage in research, write articles and conduct studies on the leading edge of medical

1 advancement. In 2000, I helped start one of the first Departments of Psychological Medicine in
2 the country. This unique program and research institute allows for specialized education and
3 research where the fields of medicine, psychology and physiology intersect.

4 The University of Southern Pangea is certainly on the leading edge of this growing field
5 and I am very proud to be a part of that development. I started consulting in 2008 and continue to
6 teach today. Specific to this case, I have several professional affiliations and am actively involved
7 with groups researching and developing ways to combat bullying. I can confidently state I am
8 very-qualified to offer the opinions set out in my report.

9 My investigation of this case involved reviewing the following documents: Hannah
10 Lannister's diary, her handwriting having been identified and confirmed by her parent Jessie
11 Lannister; several text messages exchanges between Hannah Lannister and Kai Connely; two (2)
12 documents from Winchester High School's investigation into reported bullying; also relevant
13 RDEX posts and pages from Winchester High School related to Hannah Lannister; and the report
14 from Penn Everett. Other than these documents and the information contained therein, my
15 opinions are based solely on my professional training and experience.

16 As an initial matter, I must concede that there was bullying, teasing and other conduct by
17 several individuals, including Kai Connely, that was socially unacceptable. However, the death in
18 this case was not caused by those actions.

19 She was young, in-shape and engaged in a high-intensity activity for months without any
20 problems. The mere presence of a noose does not itself create the kind of shock or overwhelming
21 psychological effect such that the body dumps stress-hormones at a level that overwhelms the
22 heart. Especially, not for a person in Hannah Lannister's demographic.

1 My report sets out some statistics and studies on Sudden Unexpected Death, which is what
2 occurred in this situation. SUD is a naturally-occurring condition that often involves a catastrophic
3 cardiac event. In the age range of Hannah Lannister, cardiac failures account for 30% of the SUDs
4 each year. She did not show many external signs of this condition and hindsight is a much-easier
5 viewpoint to diagnose the condition. Her reported fatigue, her struggles with coping as evidenced
6 in her diary, and the internalization of adverse conditions she faced all support the presence of a
7 heart condition. There are other pieces of support listed in my report.

8 It should be beyond dispute that Hannah Lannister died from a heart attack. The question
9 for cause of death then becomes, what caused the attack? Given the presence of clear support for
10 a natural cause and the medical literature supporting the low likelihood that young people succumb
11 to stress-attacks, contrary to Everett’s opinion, the only conclusion is natural heart attack. I am
12 therefore directed to the only plausible conclusion of a natural death. I incorporate here my report
13 for additional information and details supporting my conclusion.

I have given this affidavit of my own free will and certify that my statements are the truth
and I have nothing more to say.

s/ Drue Ellis
DRUE ELLIS

EXHIBIT 1
Hannah Lannister Diary- Excerpts

November 3, 2014

Alex Snow died yesterday!!! I can't believe it. I was there and everything looked fine. Heisenburg had an amazing set. Alex was such a promising person with a bright future. Why would this happen? Why do bad things happen to good people? I can't stand this stuff.

November 10, 2014

My family talks about Alex's death often.

December 31, 2014

I hope Alex is remembered for being an amazing person. Such a tragic situation.

August 20, 2015

Decided to help as a manager this year. Really enjoy being around the team and hope the season goes really well. I'd love to play one day.

November 2, 2015

Can't believe its already been a year since Alex passed. There is a trial going on because of that night. I don't think anyone knows I was there. Took off before all that stuff happened, but I don't want to be involved in the legal side of things. Such a tragedy. Hope everyone remembers the artists that pass away before their time.

November 20, 2015

Team is doing really well. Off to a 5-0 start. They play hard and are really organized. It's a cool game to see and Im proud to help.

December 2015

Watching Thunder games with my family is wonderful. Its really cool to see the difference in play between our team and the Thunder. Thinking of playing next year. It would be really cool to be on the court some. Brodie is tearing through defenses this year.

March 2016

Decided to practice full-time for next year's team. Hoping to contribute on the court. Rather than from the bench.

August 1, 2016

Killing it on the court. Really feel like I can keep up with the varsity team this year. Never felt better physically. My chest hurt though after last session. Trainer said to just rest more and not worry about it. The last few months have been intense.

September 20, 2016

Try outs today. Did well. Hope it works out. Months of work led to today. Thanked my parents and trainer for all of their work too. Got in some time on the

memorial concert. Anniversary is Nov, 2nd Website is up and running but not much interest yet.

October 1, 2016

Made the TEAM!!!! AHHHHHMMMAZZING!! So excited!!!! Had some students tease me a bit today but figure its just welcoming me to the team.

October 15, 2016

Working on the memorial concert for Alex. Coming up on two years. I can't believe its been that long already. Havent gotten the support I wanted so far but things will pay off with perseverance. Training is going well too

October 20, 2016

Named a starter for the team!!!! So happy!!!! Needed to rest more after practice earlier. Couldn't catch my breath after getting home. Weird but has happened a few times this month. Also, the concert is a no go. Noone seemed to care at all. I cry too much still over that night and this failure is killing me

October 31, 2016

The Hulk??? Apparently, Ive been referred to as a cartoon movie character for weeks now. Its crap. Ive worked for months to become a player. I hate how mean people can be. Kai Connely is terrible. Such a hateful person.

November 1, 2016

First game tonight. we lost. Played poorly, but the team is still getting to know each other. Hang on, getting some texts now.

November 3, 2016

I hear students whisper that the team was better last year, without me.

November 7, 2016

Thunder won. At least that team is doing well.

November 8, 2016

I hate this feeling. No one sees the hurt they've caused. Dad and Mom Ive been trying to be better and I cant seem to get ahead. Other kids keep putting chains on me. They keep tearing me down. I want to cry out so much. I want to hit Kai. I hate Kai. What did I do??? Why am I the target???

November 9, 2016

Kai ran into me in the hall today. Then, Kai fell down and screamed out that the big green H had smashed the team to pieces. Kai told other students to watch out for me and my "temper" No one likes me when I am angry...I don't think anyone likes me no matter my attitude. I cant handle this. My chest hurts all the time. I get anxious going

to school and practices are getting worse and worse. Maybe things would be better without me.

November 10, 2016

Nothing much to say tonight. Its hard to be around everybody. I hate getting teased for trying to be better. No one cares in this stupid place. Cant wait to leave. Another game tomorrow. Im so scared to play. If we lose again, I'll get blamed again. Kai is killing me everyday. I cant breathe at times. My chest hurts when Im at school. I may just quit the team. They were better last year. Maybe it is my fault. I use to love the game. I used to love so much. Theres too much going on that I cant seem to shake off.

EXHIBIT 2
AUTOPSY REPORT



Board of Medicolegal Investigations
Office of the Chief Medical Examiner
1115 West 17th Street
Tulsa, Oklahoma 74107
(981) 555-5890 Phone
(981) 555-9451 Fax

CERTIFICATION
I hereby certify that this document is a true and correct copy of the original document.
By: Sawyer Edgar
Date: Nov. 21, 2016

REPORT OF AUTOPSY

Decedent: Hannah Lannister Birth Date: June 16, 1999 Case: #8546750

Type of Death: Possible Heart Failure ID By: Family visual recognition and Driver's License

Autopsy Performed by: Sawyer Edgar, M.D.

I was asked to perform a limited autopsy by the Lannister family of Hannah Lannister. I have not been retained to provide any expert information, opinions, or testimony. This examination is solely to try and find the cause of death at the request of the decedent's surviving family.

PATHOLOGIC DIAGNOSES

I. Unknown Heart Failure

CAUSE OF DEATH: Heart Failure-unknown origin or cause

MANNER OF DEATH: Unknown

The facts herein are true and correct to the best of my knowledge and belief.

<u>Sawyer Edgar, MD</u>	OCME, Central Division	Nov. 21, 2016 10:10 AM
Sawyer Edgar, M.D.	Forensic Pathologist	Date and Time of Autopsy

MEDICOLEGAL INVESTIGATION

I. CIRCUMSTANCES OF DEATH:

This seventeen (17) year old female reportedly died after playing in a high school basketball game and was observed opening a locker, crying out and then falling to the ground. She was unable to be revived and was pronounced dead shortly after this event. Cause of death unknown, but heart failure expected given circumstances of death.

II. AUTHORIZATION:

The postmortem examination is performed under the authorization of the Office of the Chief Medical Examiner, Central Division, OKC, Oklahoma and at the request of the decedent's surviving family.

III. IDENTIFICATION:

Body identified by family, by visual recognition, and by Driver's License located on the body

POSTMORTEM EXAMINATION

I. CIRCUMSTANCES OF THE EXAMINATION:

The postmortem examination of Hannah Lannister is performed at the Office of the Chief Medical Examiner, Central Division, OKC, Oklahoma on November 21, 2016 at 10:10 hours.

II. CLOTHING AND PERSONAL EFFECTS:

- a. Athletic shoes on left and right foot
- b. Uniform shorts with warm-up pants on legs.
- c. Pockets were empty
- d. Raiding Danes basketball jersey on torso
- e. No jewelry on person, but necklace and earrings located in bag secured from locker
- f. Warm-up athletic top also secured from locker.

III. EXTERNAL EVIDENCE OF RECENT MEDICAL THERAPY:

AED marks confirm device application and use, also CPR performed at scene, but decedent was not revived

IV. COLLECTIONS:

Scalp-hair sample, oral swab, finger-nail swabs left and right hands, and a blood DNA card were procured.

EXTERNAL EXAMINATION

The body is sealed in a white body bag with a lock tag #11112016 intact. The body is that of an unembalmed, well-developed, well-nourished female appearing consistent with the recorded age of 17 years. The body weight is measured at 120 pounds with an athletic build. The body length is measured at 64 inches. There are no signs or evidence of external trauma or injuries. Rigor mortis is advanced in all extremities. Lividity is purple and is noted in the posterior arms, legs, and back and is fixed. The chest and back are symmetrical with normal conformation. The head, neck, and shoulders are not congested. There is no peripheral edema present. Personal hygiene is good. No unusual odor is detected as the body is examined. Anisocoria is identified; the right pupil measures 4.5 mm, the left pupil measures 4.8 mm. The hair is brown and worn to approximately 25 cm in length. The sclera are normal in color. The conjunctival surfaces are not remarkable. The irides are brown in color. The teeth are in a fair state of repair. The nose is symmetrical and the air passages are open. The external ears are normal in appearance and without injury. Examination of the skin shows several bruises on the legs but nothing remarkable given the activity level and age of the decedent.

INJURIES

There is no evidence of any external injuries anywhere on the body. There is some bruising along the shin areas of both legs, but those marks do not stand out as noteworthy based on the nature of basketball and related activity level.

BODY CAVITIES

The body is opened through the customary "Y" shaped incision. Subcutaneous fat is normally distributed, moist, and bright yellow. The musculature through the chest and abdomen is rubbery, maroon and shows no gross abnormality. The sternum is removed in the customary fashion. The organs of the chest and abdomen

are in normal position and relationship. The diaphragms are intact bilaterally. There is approximately 60 ml of liquid blood in the right and left pleural spaces. The bulk of my examination was focused on the heart.

HEART

Given the suspected cause of death the heart was subjected to meticulous gross examination of all three coronary vessels and their major branches by serial transverse sectioning of the vessel to note the degree of atherosclerotic narrowing. The subject heart was submitted to analysis through the Triphenyl Tetrazolium Chloride Test and Acridine Orange Fluorescence studies which look for evidence of a natural cause of death like myocardial infarction. I did not see any evidence of this natural cause of death. None of the blood vessels were blocked and there was no evidence of ruptured plaque. I did not find any scars or marks to indicate a typical cardiac event. In short, there was little to no evidence of a typical heart attack. The shape of the heart is concerning as the left ventricle appears to have ballooned out. Potentially, this is evidence of takotsubo cardiomyopathy or stress cardiomyopathy. I have never seen this condition before, but I have heard it referred to as "broken-heart syndrome". Also, surrounding blood appears sludgy, consistent with constant release of stress hormones.

NECK ORGANS

Musculature is normal, rubbery and maroon and the organs are freely movable in a midline position. The tongue is intact and normally papillated, without evidence of tumor or hemorrhage. Hyoid bone is intact. Cartilaginous structures forming the larynx are intact and without abnormality. The larynx is comprised of unremarkable vocal chords and folds, is widely patent without foreign material, and is lined by a smooth, glistening membrane. There are no petechiae of the epiglottis, laryngeal, mucosa, or thyroid capsule. Unremarkable neck organs.

TOXICOLOGY

Screen negative for any medications or drugs; unremarkable. All other lab work, tests, and screens were negative and within normal range.

OPINION

Unable to determine exact cause of death. Evidence supports failure of the heart leading to sudden death, but I am unable to identify direct causal factors. I can rule out myocardial infarction as the cause of death. Possibly caused by stress cardiomyopathy, but I am not familiar enough with this condition to make a definite determination.

Sawyer Edgar, MD

Sawyer Edgar, M.D.

EXHIBIT 3

**Transcript of Text Messages from the Phones of Kai Connelly and Hannah Lannister
Underlined Name is Sender of text that follows**

October 1, 2016

Kai: Hey, Hannah, congrats on making the team. I'm sure you won't mess up the season.

Hannah: Thx, I guess

Kai: The team was good last year. Don't change things

October 15, 2016

Hannah: Are you up for helping with the memorial concert?

Kai: The what? That stupid memorial idea for the dead musician? Is that your doing?

Hannah: Yeah, it's my idea, but I hope the community supports it

Kai: Not likely. No one cares about that dead news

Hannah: Life isn't important to you?

Kai: Yeah of course. Just not all ones.

October 20, 2016

Kai: Starter?? Seriously? You've been playing, what? 1 month! Wow. Must have had plenty of help with getting "better" Family got a trainer too?? I'm sure some there were some other performance enhancers around right??? No one gets cut in a few months. Passing water last year to passing my friend on the depth chart now...can't let that go unpunished

Hannah: Are you serious? Punished how exactly? Come test me on the court if you want. Stop hiding behind a screen and call me out in person you punk

Kai: hahahahaha uh oh...are you mad? I bet I wouldn't like you when you're angry right??? Hahaha. Glad that paracord is helping. Maybe I can rework it some to help more one day

Hannah: You're welcome to have it back

Kai: Nah, keep it. I'll have some more for you soon

October 31, 2016

Hannah: Any Halloween parties going on?

Kai: Yep

Hannah: Where?

Kai: Sorry, already have a full Infinity War roster....

Hannah: What?

Kai: Don't need two Hulks. Only one in the movies

Hannah: Hulk?

Kai: You know, the uber-aggressive athlete that comes out of nowhere that no one likes. Just destroys everything, even their own team at times

Kai: Have you seen any recent movie in the past 10 years?

Hannah: I don't know what you are talking about. Are you talking about me???

Kai: Whoa, whoa, clam down. Don't go all green now. No need to get angry at me. No one likes you when you're angry right???

Kai: Actually, no one likes you when you're not

November 1, 2016

Kai: First game, first loss. Nice going

Hannah: It's a team game. I didn't like how I played either but it wasn't just me

Kai: Team started 1-0 last year. You're the only change.

Hannah: Whatever

November 3, 2016

Kai: Got a great idea for you

Hannah: what do you want?

Kai: how about a memorial concert next year for your play this year. That's something everyone would get behind and support. Its something everyone can see has died swiftly

Hannah: enough is enough

Kai: Nah, not yet. Got some more equipment ready for you. Maybe it will help the team improve. Might even let you have a new view of the games. Somewhere out of the way.

November 5, 2016

Kai: uhhh 0-2....you about ready to help the team out some??? Get off the court. Get off the team. No one wants you out there. Team was better without you. Theyd be better without you again.

Hannah: I should block you

Kai: maybe, but you should do lots of things right now...like quit. Also, don't ever turn in some stupid report saying someone bullied you again. Youre so dramatic. "remember alex snow"...ahhh "remember lives matter"...geez. "Don't tease me"...boo hooo. its pathetic. Seriously, just go back to the shadows. Youre wrecking the team H. H smash!!! H break team!!! Hahahah.

Hannah: enough. I didn't turn in a report.

Kai: Liar! Liar! Youre life is on fire!!! I was talked to about a bunch of nonsense that you claim happened. Stop looking for attention. Stop making up stuff just to seem relevant.

November 9, 2016

Kai: Nice shoulder check today in the hall. Geez now I know what its like to feel a Hulk-smash!!! Had to warn a bunch of other kids so that they wouldnt get hurt either. Seriously- why are you still around? The team is worse, no one cared about that freakin stupid concert idea, NO ONE likes You.

November 10, 2016

Kai: Going to deliver your new equipment for the game tomorrow. Now remember, you have to give it your all. Its important. Just commit to the process, hang in there-ha, the change is coming.

Kai: Hello? H? you there?? Awwww did H get sad?? Hulk go sulk. Hahaha Go sulk Hulk! Good luck tomorrow.

November 11, 2016

Kai: Good luck in the 2nd half tonight. Hope the equipment helps. Im certain it will make the team better.

EXHIBIT 4
Winchester Student Report Form

ARE YOU BEING BULLIED OR HARASSED?

Name: Hannah Lannister

Date: Multiple days, for a month or so

Where were you when this incident happened? At school and at home, on my phone, on RDEX

What happened? I was teased about playing basketball and for trying to honor the memory of Alex Snow

Who else was involved? If I say they will find out and it will get worse. Several people. Kai most of all

What did you do? Nothing- what could I do? It hasn't stopped and I can't get away. I feel helpless

How well did you handle the incident? I didn't do anything wrong, why does this matter?

How many times has this happened? Nearly every day since school began and I made the varsity basketball team. Comments made in the hall, bumping into me in the hall, Kai causing others to laugh and point at me, Kai spreading rumors about my size and making fun of me for getting into shape this year

Do you need assistance? I don't know. Probably not. So many people get treated worse than me at this school. Whats the point of these forms? Nothing happens

I would like to see the school prevent bullying or intimidation by...

Please complete this form and give it to your teacher, counselor or principal.

EXHIBIT 5

Winchester High School Harassment/Bullying Investigation Form

Oklahoma law requires each district to establish a procedure for investigation of all incidents of harassment, intimidation, bullying, or threatening behaviors reported to school officials for the purpose of determining the severity of the incidents and their potential to result in future violence. This form will assist districts in investigating reported incidents of such behavior.

Person(s) Assigned to Investigation:

Date Assigned: _____

Name: Val Gray Title: Principal/Admin (#001)

Incident Details

Student Affected: _____ Grade: _____
Hannah Lannister (Student #624) 11

Student(s) Initiating Bullying/Harassment: _____ Grade: _____
Kai Connely (Student # 247) 11

Witness: _____ Grade: _____ Class: _____

Witness: _____ Grade: _____ Class: _____

Please list all witnesses including students and/or staff.

Documentation

- | | |
|---|--|
| <input checked="" type="checkbox"/> Written statement of student victim | <input checked="" type="checkbox"/> Physical evidence (if applicable) |
| <input type="checkbox"/> Written statement of witness/bystander | <input type="checkbox"/> Medical information (if applicable) |
| <input type="checkbox"/> Written statement of alleged offender | <input type="checkbox"/> Copy of police report (if applicable) |
| <input type="checkbox"/> Interview/notification of parents | <input type="checkbox"/> Copy of report form (if applicable) |
| <input type="checkbox"/> Interview of staff witness | <input type="checkbox"/> Copy of incident notification (if applicable) |

Action Taken

- | | |
|--|--|
| <input checked="" type="checkbox"/> Interviewed alleged student victim | <input type="checkbox"/> Reviewed physical evidence |
| <input checked="" type="checkbox"/> Interviewed alleged offender | <input type="checkbox"/> Reviewed medical information |
| <input type="checkbox"/> Interviewed witnesses | <input type="checkbox"/> Reviewed bus incident information |
| <input type="checkbox"/> Interviewed staff involved (list names) | <input type="checkbox"/> Reviewed student records |
| | <input type="checkbox"/> Reviewed social history between parties |
| | <input type="checkbox"/> Considered history of prior behavior |
| | <input type="checkbox"/> Other: _____ |

Investigation Findings of Harassment/Bullying Incident

<input checked="" type="checkbox"/> The Complaint is Sustained. Bullying or Harassment was verified.
<input type="checkbox"/> The Complaint was Not Sustained. There was not enough verifiable proof that Bullying or Harassment was taking place or the complaining party has refused to assist in the investigation.
<input type="checkbox"/> Unfounded. The complaint was discovered to have no merit or the complaining party has informed the investigator that the allegations were false and untrue.

Reported incident has been verified as bullying according to investigation procedure and state law definitions.

<input checked="" type="checkbox"/> Gesture, written, or verbal expression	<input type="checkbox"/> Verbal fight <input type="checkbox"/> Written or verbal threat <input type="checkbox"/> Written note <input type="checkbox"/> Written or verbal rumors <input type="checkbox"/> Seclusion <input type="checkbox"/> Embarrassing the student <input type="checkbox"/> Other:
<input type="checkbox"/> Physical Act	<input type="checkbox"/> Physical fight <input type="checkbox"/> Physical injuries <input type="checkbox"/> Other:
<input checked="" type="checkbox"/> Electronic communication Inappropriate messages on RDEX. Some teasing and slight name-calling.	Identify the component used: <input type="checkbox"/> Cell phone <input type="checkbox"/> Audio or visual image <input checked="" type="checkbox"/> Instant message/email <input type="checkbox"/> Gaming <input checked="" type="checkbox"/> Social Networking <input type="checkbox"/> Blog <input type="checkbox"/> Other:
<input type="checkbox"/> Damage of student's property	<input type="checkbox"/> Property damage <input type="checkbox"/> Stolen or missing property <input type="checkbox"/> Other:

<input type="checkbox"/> Reasonable fear of harm to person or property	<input type="checkbox"/> Fear of harm to person <input type="checkbox"/> Fear of harm to property <input type="checkbox"/> Other:
<input checked="" type="checkbox"/> Disrupt or interfere with school's educational mission or the education of student.	<input type="checkbox"/> Changes in attendance: absences, tardies <input type="checkbox"/> Missing classes/parts of school day <input type="checkbox"/> Changes in grades <input type="checkbox"/> Changes in participation of school activities <input type="checkbox"/> Avoidance of elements: lunch, bus, recess <input type="checkbox"/> Other:

Follow Up/Disciplinary Action

Victim	Offender	Action Taken	Notes
		None were warranted	
		Student contract	
		Review of bullying prevention policy	
		Conference with principal	
		Loss of privileges	
		Counseling interventions	
		School service work	
		Follow up/Monitoring	
		Loss of privileges on bus/loss of bus privileges	
		Detention	
		In-school assignments or intervention programs	
	X	Suspension	Pending legal action.
		Assignment to alternative education facility	

Student victim's parent notification on completion of investigation:

Date of notification: _____ Means of notification: Phone call to parent

Student offender's parent notification on completion of investigation:

Date of notification: _____ Means of notification: Phone call to parent

Completion of Investigation

Signature: Val Gray Date: _____

EXHIBIT 6
RDEX- Site Pages

Topic:	2016 Raiding Danes Basketball Season- November 1st
Post by:	Coaches Stops and Coal- Come support the men and women's teams
KC Student 247	Sweet!! Can't wait! Playoffs here we come again.
TM Student 579	Let's go teams!!! So good last year. When are rosters announced?
MP Admin 004	Rosters are announced in early-October
CS Student 652	Both teams will dominate! Better beat those Wheatville bumpkins
SM Student 965	Wheatville sucks! Raiding Danes for life!

Topic:	November 2, 2016 Memorial Concert Planning Group
Post by:	HL Student 624
KC Student 247	...is this a real thing? This is a joke right?
TM Student 579	No thanks
BC Student 627	Is the Hulk behind this?
CS Student 652	Hahaha. I bet so. Hulk likes Alex. Hulk loves Alex....
KC Student 247	Ha. So pathetic. No one cares
GG Student 115	I think it's a nice idea...for a loser
KC Student 247	Hahaha Nice. Thumbs Up that one all the way!

Topic:	November 2, 2016 Memorial Concert Planning Group (2nd Try)
Post by:	HL Student 624- Please help if you can.
TM Student 579	Done and dead still. Nope.
FR Student 007	Bond says- no thanks Q.
SP Student 018	This is soooooo dead. Stop trying. The flyers all ended up in the trash!!! Think about the trees your wasting! Be eco-aware.
KC Student 247	Eco-aware.... @018 do you mean... Be Green?!!! Hahahaha Come on H, be Green. Think of the trees. What a waste of time, space and breath.
KC Student 247	Go back to the bench. Go back to the shadows. If we need a bulked up "superhero" to mess everything up we will give you a call.

Topic:	The Hulk!!!
Post by:	KC Student 247- No one likes H when H is angry
KC Student 247	Oh wait...No one likes H regardless of whether H is angry.
GG Student 115	Hahahaha. Didn't think the team needed a superhero. Geez, seen the size of H??
CS Student 652	Yeah right, that looks like two months of "intense training"

TM Student 579	If we can get H to just smash the other team, then I think its brilliant to have her on the team. Bonus is we have a new mascot without needing to get a new costume
KC Student 247	(Spits drink out of mouth) Hahaha. Brilliant!!! H is a walking joke.

Topic:	“Working on my Fitness”
Post by:	KC Student 247- Hey @H (hulk)- use that paracord to get big, get strong, get ripped
KC Student 247	Oh wait...no need. The Hulk is already too freaking huge and in the way.
TM Student 579	Nice @247, the team lost again...too much muscle, no brains.
CS Student 652	Two months of “intense training”??? or some enhancing performance stuff...
TM Student 579	H shouldn’t be on the team. They suck now.
KC Student 247	0-2 start...and the only change from last year is the Hulk. Somewhere Tony Stark and the group are crying for the team.

Topic:	Basketball Game on November 11, 2016
Post by:	VG Admin/Principal 001- Team needs everyone’s support
PO Student 954	We’ll be there. Colors on and cheering loudly!
OS Student 774	0-3 start, need to turn it around
HL Student 624	Thanks for the support. The team appreciates it.
KC Student 247	When did H become a Captain? I thought Steve Rogers had that role covered.
KC Student 247	Hey H, stick to getting angry and beating things up.
CS Student 652	Scary scary, wipe the floor with them H. Get in there and smash them down!!!
HL Student 624	Who is the Hulk?
CS Student 652	A comic character, also in every big budget movie over the last ten years. Get out some. Put down the weights and see the world.
KC student 247	Hahaha. I’ve got some extra equipment that will provide some more “support” for your upcoming change. Hulk will get better. The team will at least be better after the change. Remember H to just hang in there. ☺

EXHIBIT 7
Everett Report- Plaintiff's Expert

I, Penn Everett, have been designated as an expert witness by the Plaintiff for the lawsuit filed in Travis County, Jessie Lannister v. Kai Connely, CJ-2017-747. The following statement is a true and accurate recording of my qualifications and my involvement in this matter:

QUALIFICATIONS:

1990 **Doctorate of Medicine from Canyon Ridge University**

1990-1997 **Clinical Work**

1997-2011 **Adjunct Professor of Psychology and Medicine Instructional Research at Isle of Burk University**

2011-Present **Professor and Lead Researcher for Canyon Ridge University's School of Medicine**

DOCUMENTS REVIEWED: I have reviewed completely and wholly the following exhibits:

- Ex. 1: Hannah Lannister Diary
- Ex. 2: Medical Examination and Autopsy
- Ex. 3: Text Messages
- Ex. 4: Winchester High School Student Report Form
- Ex. 5: Winchester High School Investigation Report
- Ex. 6: RDEX posts and pages
- Ex. 7: Report from Drue Ellis, Ph.D.

PUBLICATIONS AND EDITORIAL WORK

Hundreds of papers and articles in the following publications: Journal of Social & Clinical Medicine; Clinical Review, Journal of Family Psychology and Stress, Journal of Affective Disorders related to External Influences, and others. Publication dates range from 1997 to 2017.

Medical Review. Editorial Consultant (2013–present); Social Science and Medicine. Editorial Consultant (2012–present); The Scientific Review of Mental Health Practice. Editorial Consultant (2002–present); Journal of Affective Disorders related to External Influences. Editorial Consultant (2001–present); Psychotherapy Research. Editorial Consultant for Medical Implications (2001–present).

HONORS AND AWARDS

- Award for Lifetime Contributions to Bullying Research, American Association for Anti-bullying-2017
- Distinguished Adjunct Professor of Psychology Medicine, Isle of Burk University- 2010
- Fellow, John Simon Guggenheim Memorial Foundation- 2013

The following professional assessment is my opinion on this matter after reviewing my research, publications, various other authorities, review of the documents identified above, and through conversation with attorneys for the State. This opinion is entirely my work, and while I rely on other science, research, the opinions to this case are mine and mine alone, free from any undue influence.

PROFESSIONAL ASSESSMENT

Hannah Lannister's passing was the result of external overwhelming influence by Kai Connely. As the evidence and my findings show- the only theory of causality is stress cardiomyopathy or stress heart-attack. This condition is technically called takotsubo cardiomyopathy and is named as such because it was first identified by Japanese medical professionals. The condition is caused by an overwhelming amount of stress that exceeds the body's ability to regulate itself causing the heart to literally give out. In my opinion, while the bullying and harassment directed at Hannah Lannister by multiple people caused her to be in a fragile state of mind, she maintained her healthy resistance until Kai Connely's actions. The placement and presence of a noose in Hannah's locker comprised of the same material provided by Kai Connely caused a greater impact and influential affect from Kai Connely specifically. I do not believe this tragic event would have occurred without the actions of Kai Connely.

In one sense, the larger society works by "chiseling off" the odd edges of individuals so that they become productive members with a role to play to further the larger community. There is no clear line of distinction between this productive community shaping of the individual and what many see as bullying. Too often teenagers are bullied and such actions, while regrettable, rarely result in such tragic scenarios. Many students surveyed across the county report bullying about: their appearance (57%), their interest or hobbies (40%), the clothes they wear (24%), attitudes toward their mannerisms (19%), attitudes toward "too-high" grades or "too-low" grades (18% and 14% respectively), and various other topics including perceived household income, culture, religion, and race. (all equal to or less than 10%). Some of these topics are more in-line with the community reshaping concept rather than truly harmful degrading conduct or bullying. Hannah Lannister was subjected to bullying from several of these topic/groups.

The Anti-Defamation League defines "Bullying" as the repeated actions or threats of action directed toward a person by one or more people who have or are perceived to have more power or status than their target in order to cause fear, distress or harm. Forms of this type of bullying can include name calling, personal insults, making the person the subject of rumors, physical altercations, exclusion of the target, threats and destruction of property owed by or in close proximity to the target. Much of what happened in the pending matter would qualify under these categories or examples. Certainly, some of the actions would not, but enough would qualify in my opinion to support the conclusion that destructive, harmful and degrading conduct had occurred. Additionally, the bullying involved in this case was across several mediums (in person, on-line, direct and indirect messaging) and covered many hours of the day.

Current research reveals startling facts about technology use by teenagers, or "screenagers", as I refer to the group. For example: 92% of teens go online daily, 56% go online several times a day; 71% of teens use more than one social network site (Facebook, Instagram and Snapchat have been the most popular); 90% of teens with phones exchange texts and a typical teen sends and receives 30 texts per day. This information clearly shows that screenagers link social connection with technology and that social status is often determined from the degree and amount of electronic social activity connected to a particular person. It seems that the more "likes" you get, the more popular you are. Because of the emphasis on deriving social connection and value through technology and the 24-hour accessibility, the effects of social activity are exponentially increased-both good and bad effects.

An online post can be “liked” or affirmed by others in seconds and the post receives positive feedback for the person quickly. As such, there is a quicker and stronger tie between action by an individual and reaction by the community. The person posts something and feels validated “immediately”. However, the reverse situation is equally true and impactful. An online post can be “disliked” or criticized just as quickly and the person receives negative feedback “immediately”. Worse yet, many people hide behind screens and send negative feedback or insults without any repercussions. I raise these matters because of the relevance to the pending case. Hannah was bullied in person, online, and through direct and indirect messaging. While the research on electronic bullying is relatively new, Hannah’s case is a perfect example of what I have termed “Full-Circle Bullying”; in other terms, Hannah was bullied from every angle and from all directions. She could not effectively “get away”.

The conclusion offered by Drue Ellis is incorrect because it fails to place sufficient weight on the external motivators. The internal motivators mentioned by Drue were present without Hannah showing any indication of adverse medical effects. Not without the actions and conduct of Kai Connely did Hannah’s physical resistance become overwhelmed by stress. Importantly, there is no diagnosed underlying mental health condition and Hannah passed a medical screen just a short time prior to her death. There is no evidence of childhood conditions or other family conditions in Hannah’s past that would support the presence of a natural heart condition.

The bullying, coupled with the presence of a noose, is the only logical explanation for why Hannah’s heart failed. Yes, she had just competed in a basketball game, but it was several weeks into the season and in my opinion, if she truly had an underlying heart condition it would have manifested itself prior to that night. My conclusion is also supported based on the shape of Hannah’s heart as noted by the medical examiner. Stress causes the heart to change its shape and based on the medical fact that her heart had transformed into a condition consistent with takotsubo cardiomyopathy- that condition is the result supported by the evidence.

CONCLUSION:

Hannah Lannister’s death was the result of the actions of Kai Connely. There is no evidence that Hannah Lannister had a compromised health condition. Her heart was clearly capable of handling intense training for months leading up to the 2016 basketball season and her medical screen was negative. She simply did not show any signs of heart issues before the night of her death. In my opinion, given that this young healthy person died immediately after seeing a noose hanging in her locker and the related bullying that had occurred leading up to that night, Hannah Lannister died from stress-cardiomyopathy. In essence, her heart failed due to the stress inflicted on her by the actions of Kai Connely.

Penn Everett, MD

Penn Everett, M.D.

EXHIBIT 8
Ellis Report- Defense's Expert

I, Drue Ellis, Ph.D. have been designated as an expert witness by the Defendant in the lawsuit filed in Travis County, Jessie Lannister v. Kai Connely, CJ-2017-747. This statement, as drafted, revised and authorized personally, is a true and accurate recording of my qualifications and my involvement in this matter:

QUALIFICATIONS:

- 1976** **Bachelor of Science in Psychology (Minor in English Literature) from University of Cornwell**
- 1978** **Medical School at University of Cornwell**
- 1978-1981** **Clinical Internship (multi-year retention) Southern Medical Institute and Clinic at the University of Cornwell**
- 1983** **Completed Medical School at University of Cornwell**
- 1983-1995** **Clinical Physician at Ellis Clinic in Vancouver, BC Canada and Dallas, Texas**
- 1995-2000** **Associate Professor of Medicine and Stress-Effects, Department of Physiology for University of Southern Pangea**
- 2000-Present** **Professor and Lead Researcher, Department of Psychological Medicine for University of Southern Pangea**
- 2008-Present** **Forensic Medical Consultant- retained for Professional evaluations and opinions**

Books and Publications:

45 published articles and papers in various journals and magazines across the United States and Canada. Contributing author for quarterly Stress Medicine and Us publication issued by Joint Societies for Advancement of Bullying Prevention. Recipient of many grants from the American Foundation for Social Sciences and Humanities Research Council of Canada and the National Institute of Mental Health. Joint Editor for Life-Threatening Behavior publication (2015-Present).

PROFESSIONAL AFFILIATIONS

American Association of Anti-Bullying
International Society for the Study of Stress Effects on the Human Body
Canadian Society of Clinical Psychological Medicine related to Stress Effects
Association of Behavioral and Cognitive Therapy

DOCUMENTS REVIEWED: I have reviewed completely and wholly the following exhibits:

- Ex. 1: Hannah Lannister Diary
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- Ex. 3: Test Messages

Ex. 4: Winchester High School Student Report Form

Ex. 5: Winchester High School Investigation Report

Ex. 6: RDEX posts and pages

Ex. 8: Report from Penn Everett, Ph.D.

The following professional assessment is my opinion on this matter after reviewing my research, publications, various other authorities, review of the documents identified above, and through conversation with counsel for Defendant. This opinion is entirely my work, and while I rely on other science and research, the opinions to this case are mine and mine alone, free from any undue influence.

PROFESSIONAL ASSESSMENT

First, I do not dispute that Hannah Lannister was the subject of varying degrees of direct and indirect bullying. Secondly, I do not dispute that Kai Connely engaged in said bullying and that such actions are socially harmful and mean. In my opinion, Hannah Lannister had an undiagnosed heart condition that manifested itself the night of her passing. Unfortunately, that previously-identified condition resulted in her death. While very tragic, this situation is fairly common for young adults, especially athletes.

There is a condition that happens across the country, and around the world, identified as Sudden Unexpected Death in children/young-adults or “SUD”. According to the Mayo Clinic, the condition is rare and millions of elementary, high school and college athletes compete yearly without incident. Most deaths due to cardiac arrest are in older adults, particularly those with coronary artery disease. Cardiac arrest is the leading cause of death in young athletes, but the exact incidence rate is unclear. The World Health Organization identifies and defines SUD as being sudden unexpected collapse within 1 hour after the onset of symptoms (witnessed) or subjects being observed alive and symptom-free within 24 hours before an unwitnessed terminal event. Heart disease accounts for a significant proportion of SUD among young people. There are demographical, pathological, and other conditions, including the frequency of premonitory symptoms in a retrospective series of SUD cases, that attribute to a finding of undiagnosed structural heart disease. In older studies (completed more than 10 years ago), a cardiac cause was confirmed for one-third of the unexpected deaths, with an additional one-fourth of unexpected deaths being suspected, but not confirmed to be cardiac in origin.

A recent 20-year study of 4,926 autopsies performed on SUD cases involving children ages 0-17 where death occurred within 24-hours of clinical presentation with previously undetected heart disease, supports the relative high frequency of SUD. In the study, a total of 103 cases involving 51 male patients and 52 female patients, were diagnosed as having SUD. The most common diagnoses were myocarditis, hypoplastic left heart syndrome, dilated cardiomyopathy, coronary artery anomalies, and aortic stenosis. There was a significant difference in the mean age of presentation between the leading causes of SUD- 6.5 days for hypoplastic left heart syndrome, 1.7 years for dilated cardiomyopathy, and 5.4 years for myocarditis. Putting aside the technical findings, this study concluded that SUD accounted for 2.1% of all autopsies and HLHS, DCM and Myocarditis were the 3 most common diagnoses, which presented at increasing ages.

SUD can be the presenting symptom for structural heart disease in children, ages 0-17. In my professional opinion, Hannah Lannister suffered from this condition and as is usually the case, there are no presenting symptoms until the heart attack occurs. In the developed world, the annual incidence of pediatric SUD has been shown to occur in as high as 7.5 cases per 100,000 children, with the vast majority of cases

involving patients with structurally normal hearts. The relative predominance of cardiac causes of death in the pediatric population is reported to increase with age, with heart disease causing 19% of all SUDs in the 1- to 13-year-old age group and up to 30% in the 14- to 21-year old age group. Obviously, Hannah falls into the latter category and this tragic result is not unprecedented. There are pending studies that show preliminary results supporting even higher frequencies in the higher age groups, but the exact reasons for these increasing numbers have not been identified or confirmed. Regardless, there is widespread concern over increased heart conditions present in young adults today. While there were no direct symptoms presented prior to her passing, I believe there are indicators that support only the conclusion of SUD.

There is support in the materials I reviewed to establish that Hannah was experiencing internal pain and hopelessness in the months leading up to her passing. She was more upset and affected by the passing of Alex Snow, for reasons we may never know, than those around her realized. Her efforts to organize a memorial concert were external indicators of a strong emotional connection to that underlying event. The resistance she experienced when that memorial event did not materialize and the related bullying were external motivators that affected her. I agree that she probably experienced internal motivators of hopelessness and true pain or heartache arising from that incident. However, the human body is very resistant to catastrophic events and this is especially true in young adults. I simply do not believe that stress from external and internal motivators led to a stress heart-attack. Penn Everett is wrong. I do not minimize the depraved nature and mean intention behind the bullying, but I do not believe those external motivators caused her heart to be overwhelmed as a direct result.

CONCLUSION

I submit this conclusion based on a reasonable degree of medical and investigational certainty and, while subject to change as discovery continues, affirm that Hannah Lannister died from natural causes unrelated to any external influences. While the actions of many, specifically Kai Connely, are regrettable and evidence crass behavior, bullying was not the direct cause of the incident in question. Hannah Lannister appeared to have a previously undiagnosed heart condition, which is not uncommon in young adults and the intense training and rigors of the basketball season eventually caused her heart to fail. Her team's trainer provided some important facts to consider as there were some indicators that support the presence of a heart condition. Unexplained fatigue, as a result of physical activity can indicate a heart condition. Shortness of breath or chest pain are also indicators of a potential impending cardiac event. While the trainer did everything possible and appropriately reacted to the situation, I believe the result was inevitable.

While she may have also been depressed and had not been treated or properly diagnosed, depression rarely contributes directly to heart failure. She internalized the unrelated death of Alex Snow more than anyone around her appreciated. The failure of her efforts to create a memorial concert had a greater impact on her than anyone could have known at the time. The bullying, teasing, and hazing directed at her are clearly external influences, but she was young, in shape and did not show any signs of an inability to handle those influences. She was of sound mind and, by all accounts, a very intelligent, well-grounded teenager. Her heart simply failed. It happens and as advanced as American modern medicine certainly is, we cannot prevent every death. Hannah Lannister did not pass because of the actions of another person.

s/ Drue Ellis
Drue Ellis, Ph.D.

This final page is not part of the case materials, but is provided to emphasize the importance of the issues involved in the foregoing pages. Again, this case is a work of fiction. None of the characters, statements, actions or conduct involved in this case are based on real persons or events. However, bullying is a significant issue for many people and some face the issue silently. The Case Development Committee sought to create a scenario that was realistic, but productive for student-competitors to work through. I personally offer the following resources for anyone that has questions or wants to look into these matters further.

Stop Bullying.gov:

<https://www.stopbullying.gov/get-help-now/index.html>

National Bullying Prevention Center:

<https://www.pacer.org/bullying/resources/>

Oklahoma Department of Education Resources:

<https://sde.ok.gov/bullying-prevention>

National Crisis Text Line:

741-741

#BeThe1To- Be The One to Save a Life:

www.bethe1to.com

Thank you, sincerely.

Kevin Cunningham, Chairperson.