2020 PENNSYLVANIA STATEWIDE HIGH SCHOOL MOCK TRIAL COMPETITION

Addison Babbage

v.

Ruffed Grouse High School, LLC

SPONSORED BY THE YOUNG LAWYERS DIVISION OF THE PENNSYLVANIA BAR ASSOCIATION

By: Jon Grode, Paul W. Kaufman, & Jonathan D. Koltash

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Problem Questions & Contact Information

Questions concerning these case materials should be sent using the email below to David Keller Trevaskis at the Pennsylvania Bar Association (PBA). Case material questions will be answered by the Mock Trial Executive Committee. Questions regarding mock trial procedure, including any questions involving the Rules of Competition or Rules of Evidence, should be directed to your District or Regional Mock Trial Coordinators.

Answers to appropriate questions will be posted periodically in a supplemental memo on the mock trial website www.pabar.org under the Young Lawyer’s Division (YLD) link.

You may begin submitting questions anytime. The deadline for submitting questions is noon on January 8, 2020. The final update will be posted no later than January 10, 2020.

Questions must be sent in writing using email. Please be sure to include return contact information in the event we need to reach you to clarify a question. **No questions will be considered unless submitted under this procedure.**

Questions E-mail: david.trevaskis@pabar.org
Introduction and Acknowledgments

Welcome to the 2020 Pennsylvania Statewide High School Mock Trial Competition - the 36th year of one of the top secondary level academic competitions in the Commonwealth! The competition, which commenced in 1984, is sponsored by the Young Lawyers Division of the Pennsylvania Bar Association (PBA/YLD). It provides high school students with firsthand experience of the American judicial system. The Mock Trial Competition is one of a series of law-related and civic education (LRCE) programs conducted by the PBA to demystify the law for Pennsylvanians, including Freedom’s Answer, I Signed the Constitution, Project PEACE, Law Day, and Stepping Out for Seniors (called “Adulting” in some locations). As Pennsylvania looks to fulfill the civic assessment requirements of Act 35 come the 2020-21 school year, these programs, along with the Mock Trial Competition, may provide opportunities for students to “pass” their civic assessment. Questions about LRCE programs may be directed to PBA staffer Susan Etter at Susan.Etter@pabar.org.

This year’s case, Addison Babbage v. Ruffed Grouse High School, LLC, is a civil case to determine whether the defendant is liable for failing to address cyberbullying at a private school.

The case was written by Jonathan A. Grode, Paul W. Kaufman, and Jonathan D. Koltash. This is the sixth year running that the team has authored the Commonwealth’s case material (the last four years also included Talia Charme-Zane as an author). Mr. Grode and Mr. Kaufman have co-written the Pennsylvania problems since 2011, and they co-wrote the national problems in 2010, 2012, 2014 and 2015. Mr. Grode also adapted and modified the 2007 mock trial problem and wrote the 2008, 2009, and 2010 mock trial problems. Mr. Kaufman was a four-time Delaware state champion mock trialer in high school and is Vice-Chair of the National High School Mock Trial Championship Board of Directors. Mr. Koltash is the PBA/YLD Mock Trial Co-Chair.

Mr. Grode thanks his wife, Jayne Bird, who more than tolerates his ongoing obsession with mock trial drafting. Mr. Grode also thanks Roberta West for introducing him to the wondrous world of Pennsylvania Mock Trial. In addition, Mr. Grode recognizes the entire case writing team for dedication beyond words and a humor that entertains his most outlandish plots.

Mr. Kaufman thanks his wife, Sarah, for putting up with this madness and the grumbling attitude it occasionally spawns, and he apologizes to Daniel and Joshua for cutting into Gods of Olympus time and Ginger and Izzy for belly rubs denied. Mr. Kaufman also especially thanks the Jons, who make every minute of the pain worthwhile. Talia, we miss you.

Mr. Koltash thanks his wife, Alaina, for her patience and support each year during “mock trial season” - which never seems to end. He also thanks Mr. Grode and Mr. Kaufman, whose leadership in writing the problem each year is greatly appreciated. Their countless hours and dedication to ensuring a balanced, creative problem for the participants of the competition makes them the unsung heroes of the competition. For that, he is in their debt. Mr. Koltash would also like to thank Mark Kovalcin, who provided expert editing assistance.
The authors collectively thank Jeremy Rothman for the image used at Exhibit 6 (The Eye). We also thank Vector Solutions for the image used at Exhibit 4 (The Cyberbullying Infograph).

Thanks also goes to the other co-Chair of this year’s Competition and current PBA/YLD Chair, Jennifer Menichini Drahus, Esq., for her efforts in organizing and implementing the many facets of this competition, including but not limited to her support of the mad fools who run it.

Additionally, we thank David Trevaskis, PBA Pro Bono Coordinator, a past winner of the Isidore Starr Award for Excellence in Law-Related Education from the American Bar Association, for his continued involvement and experienced guidance in implementing the 2020 Mock Trial Competition. Trevaskis is entering his 35th mock trial season.

We also thank the incomparable Jane Meyer, whose tireless work over the dating back to the previous century has ensured that the many errors that reach her desk do not leave it.

Finally, we thank the hundreds of volunteers who annually contribute their time and energy to the overall organization and running of the program. Last, but certainly not least, we thank the PBA staff, headed by Executive Director Barry Simpson and Deputy Executive Director Fran O’Rourke, and the many PBA staff members who provide valuable time and talent throughout the mock trial season. Without their assistance, this competition would not be the tremendous success that it is each year.

Special thanks go to Maria Engles, the PBA/YLD Coordinator, whose contributions to the program are so numerous as to defy description.

We hope you find these materials interesting, and wish you all the best of luck!
Case Summary

“You never realize how strong you are until being strong is the only choice you have.”
- Unknown

Addison Babbage was an exceptional student but an even better chess player, so it was no shock when her/his parents enrolled her/him in Ruffed Grouse High School, a private school in Wisawee, Pennsylvania, one of the best schools in the state. Ruffed Grouse, a school that’s sports programs ended following a major drug scandal in 2013, needed a hero, someone to cheer. And Addison Babbage became that person… for a time.

But things are never as they seem. The same competitive forces that drove Ruffed Grouse’s sports teams beyond the rules continued to propel the school. And Teagan Eckert, the school principal, was no exception. Tough, fierce, mean, s/he controlled every aspect of Ruffed Grouse High. To stay out of trouble, to survive, you had to stay low or succeed. Addison chose to succeed.

Ultimately, the competitive culture fostered by Principal Eckert was channeled through social media, where students tormented their fellow classmates. When cyberbullying drove one student to go missing for days on ends, speculation began. People began to question Ruffed Grouse’s commitment to student safety, something that called Principal Eckert’s leadership into question. For someone like Teagan Eckert, that lack of control was unacceptable, and that lead to more zero tolerance policies.

The negative forces that existed at Ruffed Grouse would eventually ensnare Addison. When Addison’s family began construction on a piece of property that was important to the local community known affectionately as “The Eye,” that underground network of negativity turned its attention on Addison. From whispers in the hallway to fake Facebook accounts, Addison was the subject of constant attacks by other students hiding behind their computer screens. When s/he reached out to help from her/his school, through its “zero tolerance policy,” Addison feels s/he only got only the barest assistance. And when those constant attacks were too much to handle, Addison snapped and destroyed Ruffed Grouse’s state-of-the-art chess lab.

Addison’s education was interrupted. College scholarships were lost. Even chess, Addison’s refuge, was tainted forever. Addison claims that Ruffed Grouse High’s negligence destroyed a once-promising life.

Addison Babbage, Makenzie Zuse, a former teacher and anti-bullying monitor from Ruff Grouse High, and Sloan Atanasoff, Ph.D., will testify that it was Ruffed Grouse’s conduct that lead to this culture of bullying and its negligence in protecting Addison.

Teagan Eckert: Ruffed Grouse’s Principal, Blaine Eckert, Addison’s former friend, and Dakota Turing, Ph.D. will testify on behalf of Ruffed Grouse High and defends the schools actions as measure and appropriate.

Let the jury decide. Trial is joined.
A Note for Coaches and Students

This year’s problem deals with cyberbullying – a real epidemic facing our society. While the internet may have been one of humankind’s greatest creations, it is equally becoming one of its most harmful weapons.

Cyberbullying is bullying that takes place over digital devices like cell phones, computers, and tablets. Cyberbullying can occur through SMS, Text, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behavior.

The most common places where cyberbullying occurs are:

- Social Media, such as Facebook, Instagram, Snapchat, and Twitter
- SMS (Short Message Service) also known as Text Message sent through devices
- Instant Message (via devices, email provider services, apps, and social media messaging features)

Cyberbullying can occur when someone continually makes fun of another person online, or repeatedly picks on another person through e-mail or text message, or when someone posts something online about another person that they do not like. Cyberbullying raises unique concerns in that it can be:

- Persistent – Digital devices offer an ability to immediately and continuously communicate 24 hours a day, so it can be difficult for children experiencing cyberbullying to find relief.
- Permanent – Most information communicated electronically is permanent and public, if not reported and removed. A negative online reputation, including for those who bully, can impact college admissions, employment, and other areas of life.
- Hard to Notice – Because teachers and parents may not overhear or see cyberbullying taking place, it is harder to recognize.

Worse, the internet allows people to do these harmful acts anonymously. It is often hard to determine who the bully is and, in many cases, it is a number of individuals posting hateful messages. Individual bullies sometimes join in because they do not realize the harm their comments have on the bullied individual because they never fully see the collective comments. Sometimes the bullies do it because they do not have to look their victim in the eyes. What compounds this problem is that the internet gives the bully or bullies a large platform in which to harass and attack his or her victim.

Cyberbullying often leaves its victim feeling helpless. Those who are cyberbullied feel less control than those facing an in-person bully, because they cannot limit who views the bullying and have even less capacity to make the bullying stop.

Cyberbullying is not just taking place in middle schools and high schools, but in all corners of our society. From our places of employment to our sports fields, we see a growing trend of people using technology in a spiteful and hateful manner. If you or anyone you know is the target of cyberbullying, the Mock Trial Executive Committee wants you to know there are resources through your local school, the local police, the state police, and other organizations available to
you. We also ask that before you post online, you *think* about what you are saying, who you are saying it to, and how *you would feel if someone said that about you*.

There are numerous resources available regarding bullying and cyberbullying. We urge everyone to take a few minutes and educate yourselves. There is a wealth of information about this problem, but a few valuable resources are:

- [https://www.stopbullying.gov/](https://www.stopbullying.gov/), an official page full of resources and information from the United States Department of Health and Human Services;
- [https://cyberbullying.org/](https://cyberbullying.org/), the website of the Cyberbullying Research Center, with resources for educators, parents, and teens and a list of national cyberbullying laws;
- [https://www.education.pa.gov/Documents/K-12/Safe%20Schools/PA%20Bullying%20Consultation%20Line%20Poster.pdf](https://www.education.pa.gov/Documents/K-12/Safe%20Schools/PA%20Bullying%20Consultation%20Line%20Poster.pdf), This Pennsylvania Department of Education poster lists resources and provides the PA hotline for those who are aware of or are suffering from cyberbullying; and
- [https://behrend.psu.edu/school-of-humanities-social-sciences/research-outreach/core/resources-for-educators/bullying-and-cyberbullying-resources](https://behrend.psu.edu/school-of-humanities-social-sciences/research-outreach/core/resources-for-educators/bullying-and-cyberbullying-resources), maintained by Penn State Behrend and linking to numerous other resources, including resources for educators.

We discuss the consequences of cyberbullying in the case, but if anything, we are understating them. Significant research links cyberbullying to serious long-term mental health risks, including anxiety, depression, eating disorders, and suicide. These risks are even greater when the bullying is directed — as it so often is — at students who are especially vulnerable due to their appearance, their physical or mental health, or their sexual orientation or gender expression.

Cyberspace holds tremendous promise for education, cultural exchange, and are meaningful dialogue. However, even a casual glance at Twitter or Facebook demonstrates that the internet risks becoming a fractious place more likely to lead to bruising personal attacks and ignorant insults than it is to open meaningful dialogue.

Until we can reclaim the civic discourse throughout society that our mock trial ethics pledge ensures for this competition, we all have an obligation to step up the efforts to stamp out bullying and to protect our teammates, classmates, and friends — or, for that matter, our enemies — from harassment. Silence can be devastating. But many victims of cyberbullying report that merely one or two positive conversations made a tremendous difference for them.

If you have been the victim of cyberbullying, report it. Take it to the responsible authorities. Get help, if you need it. If you are the friend of someone who has been cyberbullied, stand up and be heard as an ally, and see to it that your friend gets the help s/he needs. And if you have been a cyberbully, whether intentionally or in a fit of pique you didn’t even recognize at the time, it is never too late to apologize and to commit yourself to doing better next time.

The Internet will not fix itself. We have to be the change we wish to see in the world.
ADDISON BABBAGE, )
Plaintiff, )

v. )

RUFFED GROUSE HIGH SCHOOL, LLC, )
Defendant. )

COURT OF COMMON PLEAS OF THE 61st JUDICIAL DISTRICT, PENNSYLVANIA

Docket No.: CP-61-CV-113-2019

COMPLAINT

Factual Averments

1. At all times relevant to the present complaint, including particularly in the years 2016-2018, plaintiff Addison Babbage was a student at Ruffed Grouse High School.

2. Ruffed Grouse High School, LLC ("Ruffed Grouse") is a private educational institution in Wisawe, Laurel County, Pennsylvania.

3. At all times relevant to the present complaint, including particularly in the years 2016-2018, Blaine Eckert was a student at Ruffed Grouse High School.

4. At all times relevant to the present complaint, including particularly in the years 2016-2018, Teagan Eckert was the Principal of Ruffed Grouse High School.

5. Teagan Eckert is the parent of Blaine Eckert.


7. In the 2017-18 school year, the Ruffed Grouse chess team was ranked as high as 6th in the nation in the United States Chess Federation scholastic rankings.

8. Addison Babbage was the star, leader, and captain of the Ruffed Grouse chess team.

9. Addison Babbage was considered the odds-on favorite to win the Pennsylvania state championship in chess and was ranked nationally in the top 20 chess players in her/his age group.
10. Addison Babbage was heavily recruited by top colleges with chess programs and, had the events of this complaint not occurred, would have been invited to the USCF’s developmental program.

11. An invitation to the USCF’s developmental program would have raised Addison Babbage’s profile in the community, potentially leading to lucrative private coaching and team development contracts.

12. Beginning in 2016 and increasingly in the 2017 and 2018 school years, despite being the Principal of Ruffed Grouse and therefore responsible for the well-being of all of its students, Teagan Eckert began a campaign of emotional abuse designed to destroy Addison Babbage’s ability to play competitive chess.

13. Teagan Eckert engaged in this effort in order to improve Blaine Eckert’s position on the team, to improve Blaine Eckert’s prospects of winning a college chess scholarship, and to win Blaine Eckert admission into the USCF developmental program, as well as to promote Blaine Eckert’s professional opportunities in the chess community.

14. Teagan Eckert’s efforts initially consisted of ratcheting up the pressure to perform on Addison Babbage but eventually turned into orchestrating deliberate acts of cyberbullying that targeted Addison Babbage. These coordinated efforts gradually destroyed Babbage’s mental health and ruined her/his ability to play competitive chess.

15. Teagan Eckert allowed Blaine Eckert and/or others to orchestrate a campaign of cyberbullying against Addison Babbage, despite Ruffed Grouse’s “zero tolerance” policy for cyberbullying or online harassment.

16. Ruffed Grouse is permitted to have a stricter anti-harassment policy than a public institution because it is not bound by the First Amendment as a state institution is. Ruffed Grouse chose to take on the responsibility to prevent and punish cyberbullying.

17. As a result of the sustained and unpunished cyberbullying, Addison Babbage began to suffer a mental breakdown.
18. Ultimately, this breakdown led to the end of Addison Babbage’s chess career when Babbage was unable to play in the final rounds of the U.S. Chess Federation mid-Atlantic scholastic tournament, which is among the most prestigious youth tournaments in the nation.

19. The breakdown brought on by unrelenting bullying also caused Addison Babbage to experience a psychotic break, leading to an uncharacteristic episode in which Addison Babbage destroyed school property.

20. Ultimately, the damage brought on by Eckert’s campaign of bullying or failure to prevent others’ campaign of bullying caused Addison Babbage to miss her/his senior year of high school.

21. The destruction of Addison Babbage’s educational and occupational prospects has caused irreparable harm and significant financial damages in terms of both lost wages and medical costs – including but not limited to inpatient mental health treatment – to Addison Babbage and Addison Babbage’s family.

   **Count 1 – Cause of Action - Negligence**

22. Ruffed Grouse High School assumed a duty of care to follow its own policies.

23. Among Ruffed Grouse’s policies is the Policy Regarding Bullying of All Forms, implemented at Ruffed Grouse in April 2017.

24. This policy defines harassment as “written, verbal or physical conduct that adversely affects the ability of one or more students to participate in or benefit from the school’s educational programs or activities because the conduct is so severe, persistent or pervasive.”

25. Pursuant to that policy, school officials are required to investigate all allegations of cyberbullying or harassment.

26. Following this investigation, if a student or staff member is found to have engaged in cyberbullying or harassment, the student or staff member ***must*** be suspended for a period of at least one day and must receive cyberbullying and harassment education from an accredited provider before returning to school.
27. On or about March 9, 2018, teacher Makenzie Zuse informed Teagan Eckert that Addison Babbage was being harassed online by members of the Ruffed Grouse community.

28. On or about April 12, 2018, Addison Babbage informed Dakota Turing – a clinical psychologist tasked with anti-bullying initiatives under Ruffed Grouse’s policy – that Babbage was being harassed online by members of the Ruffed Grouse community.

29. On or about May 11, 2018, Addison Babbage filed a formal bullying/harassment complaint through teacher and anti-Harassment Monitor Makenzie Zuse with Principal Eckert and Dakota Turing.

30. In contravention of Ruffed Grouse policy, Teagan Eckert and Dakota Turing took little or no action to investigate these allegations.

31. Teagan Eckert and Dakota Turing took no action to end the harassment.

32. Teagan Eckert and Dakota Turing took no action to discipline those who engaged in the online harassment.

33. Instead, Teagan Eckert engaged in victim-blaming and exacerbated the damage being done by the harassment by making inappropriate comments to Addison Babbage.

34. Other members of the Ruffed Grouse faculty, staff, and agents also failed to take reasonable actions or took unreasonable actions in addressing the cyberbullying.

35. In interacting with Addison Babbage, and in failing to take actions to enforce Ruffed Grouse policy, Teagan Eckert and these faculty and staff members acted within the scope of their employment.

36. Teagan Eckert’s failure to act, and the failure to act of other Ruffed Grouse faculty and administration, was unreasonable and in violation of Ruffed Grouse policy.

37. This failure caused the above-identified damages.
I, Addison Babbage, verify that the statements made in the foregoing are true and correct based upon my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

/s/ Addison Babbage
ADDISON BABBAGE,  )  COURT OF COMMON PLEAS OF
                        )  THE 61st JUDICIAL DISTRICT,
Plaintiff,  )  PENNSYLVANIA
v.  )  Docket No.:    CP-61-CV-113-2019
RUFFED GROUSE HIGH SCHOOL, LLC,  )  )
Defendant.  )  )

DEFENDANT’S ANSWER

1.  Admitted.
2.  Admitted.
3.  Admitted in part. By way of further response, defendant states that before Addison
    Babbage was a student at Ruffed Grouse, s/he experienced stressors that contributed to
    or caused whatever emotional harm s/he suffered, which harm is denied.
4.  Admitted in part. By way of further response, Teagan Eckert inherited a school with
    policies and a history, and those policies and that history are relevant to the instant
    matter.
5.  Admitted.
6.  Admitted.
7.  Admitted.
8.   Denied as stated. It is admitted only that Addison Babbage was a captain during one
     year of chess competition and competed as first chair for two years of chess
     competition.
9.   Denied as stated. There is no wagering on Pennsylvania state high school chess
     competition, and thus there are no odds. Defendant neither admits nor denies Addison
     Babbage’s chess ranking; such rankings speak for themselves.
10.  Defendant is without information sufficient to form a belief about the truth or falsity of the
     allegations of this paragraph. Accordingly, they are denied.
11. Defendant is without information sufficient to form a belief about the truth or falsity of the allegations of this paragraph. Accordingly, they are denied.

12. Denied, including in all its sub-parts.

13. Denied, including in all its sub-parts.

14. Denied, including in all its sub-parts.

15. Denied, including in all its sub-parts.

16. Denied as stated. Defendant admits that it had a state-of-the-art, cutting edge anti-cyberbullying policy. The remaining averments are denied.

17. Denied as stated. Defendant admits only that Addison Babbage experienced mental health issues in late 2018. The remaining averments are denied.

18. Denied as stated. It is admitted only that Babbage chose not to compete in the prestigious mid-Atlantic scholastic chess tournament. The remaining averments are denied.

19. Denied. Defendant admits only that Addison Babbage experienced mental health issues in late 2018. The remaining averments are denied.

20. Denied. Defendant admits only that Addison Babbage experienced mental health issues in late 2018. The remaining averments are denied.


22. The allegations of this paragraph contain legal conclusions to which no response is required. To the extent that a response is deemed necessary, Defendant denies that its policies change its duty of care under Pennsylvania tort law.

23. Admitted.


25. Admitted in part. Defendant admits that Ruffed Grouse officials are required by the policy to take reasonable steps to investigate.
26. Denied. School officials may exercise reasonable discretion in the exercise of its policies. The policies are strong guideposts for the execution of this discretion, but no school policy precludes an official from making reasonable decisions in individual cases.

27. Denied.


29. It is admitted only that Makenzie Zuse wrote an email to Dr. Turing and Principal Eckert on or about May 11, 2018. The contents of that email speak for themselves, and all characterizations thereof are denied. The remaining allegations of this paragraph are denied.

30. Denied, including in its presumption of facts previously denied.

31. Denied. Defendant was continuously acting to stamp out harassment.

32. Denied. Defendant was continuously acting to stamp out harassment.

33. Denied.

34. Denied.

35. Denied as stated, including in its presumption of facts previously denied.

36. Denied as stated, including in its presumption of facts previously denied.

37. Denied.

NEW MATTER – COMPARATIVE NEGLIGENCE

1. Addison Babbage and/or her/his lawful guardians, Charles and Marianne Babbage, were negligent in addressing the issues raised in plaintiff's complaint.

2. This negligence includes, but is not limited to:
   a. Failing reasonably to notify Ruffed Grouse officials of the alleged cyberbullying;
   b. Failing reasonably to follow Ruffed Grouse policy relating to the alleged cyberbullying;
   c. Failing reasonably to seek counseling to address the alleged mental or emotional issues that were asserted to being suffered by the plaintiff;
d. Participating in cyberbullying that caused retributive cyberbullying;

e. Charles and/or Marianne Babbage placing academic, extracurricular, and competitive pressure on Addison Babbage such that it harmed Addison Babbage; and/or

f. Charles and/or Marianne Babbage failing to emotionally support Addison Babbage such that it harmed Addison Babbage or exacerbated the harm to Addison Babbage.

3. Defendant therefore avers that any recovery by plaintiff must be reduced by the amount caused by plaintiff's own negligence or that of plaintiff's parents, while plaintiff was a minor.

4. Defendant further avers in the alternative that plaintiff's negligence was more than 50% responsible for plaintiff's damages.

5. Defendant therefore avers in the alternative that plaintiff cannot recover from Defendant.
ADDISON BABBAGE, )
Plaintiff, )
v. ) Docket No.: CP-61-CV-113-2019
RUFFED GROUSE HIGH SCHOOL, LLC, )
Defendant. )

COURT OF COMMON PLEAS OF )
THE 61st JUDICIAL DISTRICT, )
PENNSYLVANIA

PLAINTIFF’S ANSWER TO NEW MATTER

1. This paragraph includes legal allegations to which no response is required. To the extent that a response is deemed required, these allegations are denied.

2. This paragraph includes legal allegations to which no response is required. To the extent that a response is deemed required, these allegations are denied, including in all sub-paragraphs. Plaintiff specifically denies that s/he or her/his parents acted unreasonably in any way.

3. This paragraph includes legal allegations to which no response is required. To the extent that a response is deemed required, these allegations are denied.

4. This paragraph includes legal allegations to which no response is required. To the extent that a response is deemed required, these allegations are denied.

5. This paragraph includes legal allegations to which no response is required. To the extent that a response is deemed required, these allegations are denied.
Presently before the Court are three issues: (1) the defendant’s motion in limine to exclude evidence of its anti-bullying policies on the grounds of relevance; (2) the question of comparative damages; and (3) the question of respondeat superior.

With respect to the motion in limine, in essence, the defendant argues that its policies do not create an independent legal duty. In other words, defendant argues that its obligations in negligence are not defined by those policies. Although there are circumstances where an entity’s policy can create a legal duty in tort, defendant is correct that its particular policies do not rise to that level. Accordingly, the defendant is correct that its duty in tort is not impacted by the fact of its policies or the language it chose. Its obligation under Pennsylvania law was to exercise reasonable care, which is the care a person of ordinary prudence would exercise under like circumstances. Here, because defendant is an educational institution, its duty is defined not by the common person but by other educators exercising ordinary diligence in administering a school program. Thus, the duty of care defendant owed to its students was to perform as a reasonable educational institution would have, in the exercise of due diligence and the knowledge of administration and adolescent behavior and needs reasonably expected of any reasonable educator.

Where the defendant errs is in believing that this standard of care makes the policies irrelevant to a claim or defense. The hurdle of relevance is a low one: relevant evidence need only make any fact at issue more or less likely. See Rule of Evidence 401. Clearly, by the testimony of its own witnesses, defendant’s anti-bullying policies were the result of careful consideration and expert advice. Whether they were “beyond reasonable” or simply what was the consensus as to what was reasonable given the circumstances is something the jury is entitled to decide.

Nor did those bullying policies come into existence in a vacuum. They arose from bullying issues. Put simply, a school with a bullying problem ought to take reasonable steps to address that problem, and plaintiff is free to offer evidence that tends to show that these policies were a reasonable response to past issues, and thus that they set a higher bar for reasonable responses to future problems than a school without any problematic history.

Accordingly, the Court holds that evidence of RGHS’s anti-bullying policies is relevant and probative of facts at issue in this case. Assuming the remaining hurdles to admissibility can be overcome, the jury is entitled to hear about these policies.

The second issue the Court must address is the question of comparative negligence. The problem here is, quite simply, one of age. When the conduct in question occurred, Addison Babbage was a minor, and her/his parents were her/his legal guardians. Now Addison Babbage is of majority and brings the instant suit in her/his own name.
The parties agree that Addison Babbage is responsible for her/his own negligent acts, and the Court shares that conclusion. Even at ‘only’ 16 or 17, Addison Babbage was capable of acting with the maturity necessary to make meaningful decisions, at least insofar as any individual of that age is. And, of course, once of age Addison Babbage is responsible for her/his actions as an adult.

But defendant further argues that Addison Babbage’s parents are also responsible for negligent acts that contributed to the alleged damages. This is a closer question, as a matter of law. Are the Babbages a necessary third-party defendant? How would one delineate these responsibilities? Fortunately, during oral argument on this question, the parties agreed that Addison Babbage would not seek any form of compensation for any negligent parenting. Indeed, the Babbage family was entirely clear that they each thought none had occurred.

As a result, the matter can be put to the jury by treating Addison Babbage and her/his parents as a single unit for purposes of the jury’s verdict. Any negligent acts or omissions found to have been committed by Charles and Marianne Babbage while Addison Babbage was a minor, or by Addison Babbage during the relevant time period, shall reduce the verdict against defendant as a matter of comparative negligence. Should the aggregate negligence exceed 50% of the total negligence found, plaintiff shall be unable to recover as a matter of law.

Finally, Ruffed Grouse argues that it cannot be liable for any acts or omissions of its Principal, Teagan Eckert, taken for the purpose of advancing Eckert’s child, Blaine, at the expense of Addison Babbage. Ruffed Grouse argues that these are not within the scope of Eckert’s employment.

This is a close question, but in order for a principal to be liable for the acts of its agents, the agents do not have to be pure as the driven snow. For example, Federal Express cannot escape liability for a collision caused by its driver speeding by saying that company policy is not to speed. The driver, in uniform and driving a vehicle on FedEx business still binds FedEx, even if one reason that she is speeding is to get home sooner. As long as some interest of the act or omission serves the employer, the employer is bound by the acts of the employees.

It appears to the Court that Teagan Eckert used the authority of the office of principal when taking the acts or omitting to take the acts alleged. In that sense, s/he was like the FedEx driver, in a metaphorical uniform and driving a metaphorical truck. And Eckert has consistently testified that s/he was acting in the way s/he thought would make Addison the best chess player, for the benefit of Ruffed Grouse. Indeed, plaintiff has done nothing to show that helping to toughen up Addison Babbage for competition – whether wise or misguided – was not one of Teagan Eckert’s purposes in acting or choosing not to act. Accordingly, because even a mixed motive leads to respondeat superior liability under Pennsylvania law, all of Teagan Eckert’s actions necessarily bind Ruffed Grouse.

BY THE COURT:

G. Hopper, J.

G. Hopper, J.
At the conclusion of a jury trial, the judge will instruct the jury how to apply the law to the evidence. Hypothetically, if the judge in your mock trial case were to provide instructions to the jury, they would look something like the following:

[Please note: A copy of these instructions may not be used as an exhibit during the mock trial competition; however, students may use these concepts in fashioning their case and making arguments to the jury.]

1. Role of Jury.

Members of the jury, you have seen and heard all the evidence and the arguments of the lawyers. Now I will instruct you on the law.

You have two duties as a jury. Your first duty is to decide the facts from the evidence that you have heard and seen in court during this trial. That is your job and yours alone. I play no part in finding the facts. You should not take anything I may have said or done during the trial as indicating what I think of the evidence or what I think about what your verdict should be.

Your second duty is to apply the law that I give you to the facts. My role now is to explain to you the legal principles that must guide you in your decisions. You must apply my instructions carefully. Each of the instructions is important, and you must apply all of them. You must not substitute or follow your own notion or opinion about what the law is or ought to be. You must apply the law that I give to you, whether you agree with it or not.

In the jury room you will discuss the case among yourselves, but ultimately each of you will have to make up his or her own mind. This is a responsibility that each of you has and that you cannot avoid.

Your verdict must represent the jury’s considered, final judgment. While the view of every juror must be considered, your verdict need not be unanimous. A verdict rendered by five-sixths of the jury shall constitute the verdict of the entire jury. Five-sixths of twelve is ten. So when ten of you have agreed that you have reached a verdict, indeed, you have. You should tell the bailiff, and we will reconvene court to accept your verdict.

2. Jury sole judge of facts; sympathy or prejudice not to influence verdict.

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

Although the lawyers may have called your attention to certain facts or factual conclusions that they thought were important, what the lawyers said is not evidence and is not binding on you. It is your own recollection and interpretation of the evidence that controls your decision in this case. Also, do not assume from anything I may have done or said during the trial that I have any opinion about any of the issues in this case or about what your verdict should be.
Perform these duties fairly and impartially. Do not allow sympathy, prejudice, fear, or public opinion to influence you. You should also not be influenced by any person's race, color, religion, national ancestry, or gender.

3. **Credibility of witnesses.**

As I stated in my preliminary instructions at the beginning of the trial, in deciding what the facts are you must decide what testimony you believe and what testimony you do not believe. You are the sole judges of the credibility of the witnesses. Credibility refers to whether a witness is worthy of belief: Was the witness truthful? Was the witness’ testimony accurate? You may believe everything a witness says, or only part of it, or none of it.

You may decide whether to believe a witness based on his or her behavior and manner of testifying, the explanations the witness gave, and all the other evidence in the case, just as you would in any important matter where you are trying to decide if a person is truthful, straightforward, and accurate in his or her recollection. In deciding the question of credibility, remember to use your common sense, your good judgment, and your experience.

In deciding what to believe, you may consider a number of factors:

1. The opportunity and ability of the witness to see or hear or know the things about which the witness testified;
2. The quality of the witness’ knowledge, understanding, and memory;
3. The witness’ appearance, behavior, and manner while testifying;
4. Whether the witness has an interest in the outcome of the case or any motive, bias, or prejudice;
5. Any relation the witness may have with a party in the case and any effect the verdict may have on the witness;
6. Whether the witness said or wrote anything before trial that was different from the witness’ testimony in court;
7. Whether the witness’ testimony was consistent or inconsistent with other evidence that you believe; and
8. Any other factors that bear on whether the witness should be believed.

Inconsistencies or discrepancies in a witness’ testimony or between the testimony of different witnesses may or may not cause you to disbelieve a witness’ testimony. Two or more persons witnessing an event may simply see or hear it differently. Mistaken recollection, like failure to recall, is a common human experience. In weighing the effect of an inconsistency, you should also consider whether it was about a matter of importance or an insignificant detail. You should also consider whether the inconsistency was innocent or intentional.

You are not required to accept testimony even if the testimony was not contradicted and the witness was not impeached. You may decide that the witness is not worthy of belief because of the witness’ bearing and demeanor, or because of the inherent improbability of the testimony, or for other reasons that are sufficient to you.

After you make your own judgment about the believability of a witness, you can then attach to that witness’ testimony the importance or weight that you think it deserves.

The weight of the evidence to prove a fact does not necessarily depend on the number of witnesses who testified or the quantity of evidence that was presented. What is more important
than numbers or quantity is how believable the witnesses were, and how much weight you think their testimony deserves.


This is a civil case in which the plaintiff seeks damages.

The Plaintiff has the burden of proving her/his case by what is called the “preponderance of the evidence.” That means Plaintiff has to prove to you, in light of all the evidence, that what s/he claims is more likely so than not so. To say it differently: if you were to put the evidence favorable to Plaintiff and the evidence favorable to Defendant on opposite sides of the scales, the Plaintiff would have to make the scales tip ever so slightly to her/his side. If the Plaintiff fails to meet this burden, the verdict must be for Defendant. If you find after considering all the evidence that a claim or fact is more likely so than not so, then the claim or fact has been proved by a preponderance of the evidence.

You may have heard of the term “proof beyond a reasonable doubt.” That is a stricter standard of proof and it applies only to criminal cases. It does not apply in civil cases such as this, so you should put it out of your mind.

In determining whether any fact has been proved by a preponderance of evidence in the case, you may, unless otherwise instructed, consider the testimony of all witnesses, regardless of who may have called them, and all exhibits received in evidence, regardless of who may have produced them.

You should not consider the impact that a verdict you render will have on the parties. Your sole job is to determine whether the Plaintiff has met her/his burden of proof.

5. Issues in the Case

The Plaintiff was a student at Ruffed Grouse High School. S/He alleges that the high school failed to take reasonable steps to protect her/him from cyberbullying by other students and/or members of the school administration. A school has an obligation to take reasonable steps to protect its students from these kinds of harms. It does not have an obligation to take extraordinary steps or to prevent these harms if extraordinary steps would have been required.

In judging whether the efforts taken by Ruffed Grouse High School were reasonable, you may – but are not required to – consider Ruffed Grouse’s policies regarding cyberbullying and any commitments it has made in that regard. Those are not legally binding obligations, but you may find that failure to meet its own policies is evidence that Ruffed Grouse failed to act reasonably.

6. Negligence

In this case, you must decide whether defendant Ruffed Grouse High School was negligent. I will now explain what negligence is.

A person or entity must act in a reasonably careful manner to avoid harming others. When a person or entity has an obligation to protect another person, such as when a school has an obligation to protect its students, it must act in a reasonably careful manner to prevent harm to those others.
The care required varies according to the circumstances and the degree of danger at a particular time. You must decide how a reasonably careful person would act under the circumstances established by the evidence in this case.

A person who does something a reasonably careful person would not do under the circumstances is negligent. A person also can be negligent by failing to act. A person who fails to do something a reasonably careful person would do under the circumstances is negligent.

The reasonable person is a person of ordinary common sense and diligence. When the individual in question possesses a special skill, though, he or she must exercise the reasonable level of skill one would expect for someone in that profession. That is true for doctors, lawyers, and it is true for educators as well. An educator must act reasonably, using the skills he or she has gained in training and experience. However, an educator still needs only to act as a reasonable educator acting with reasonable diligence. Exceptional or extraordinary effort is not required, just the regular, ordinary efforts a reasonable educator would take.

7. **Comparative Negligence**

a. In order for Addison Babbage to recover in this case, Ruffed Grouse High School's negligent conduct must have been a factual cause in bringing about harm. Conduct is a factual cause of harm when the harm would not have occurred absent the conduct. To be a factual cause, the conduct must have been an actual, real factor in causing the harm, even if the result is unusual or unexpected. A factual cause cannot be an imaginary or fanciful factor having no connection or only an insignificant connection with the harm. To be a factual cause, Ruffed Grouse High School's conduct need not be the only factual cause. The fact that some other causes concur with Ruffed Grouse High School's negligence in producing an injury does not relieve Ruffed Grouse High School from liability as long as its own negligence is a factual cause of the injury.

b. As a defense, Ruffed Grouse claims that Addison Babbage's own negligence was a factual cause of her/his injury, and it claims that while Addison Babbage was a minor, her/his parents acted negligently, causing her/him harm. The defendant has the burden of proof on this defense.

To prove negligence by Addison Babbage, Ruffed Grouse has the burden to prove both of the following:

1. that Addison Babbage was negligent; and
2. that Addison Babbage’s negligence was a factual cause of her/his injury.

During part of this time, Addison Babbage was a minor, someone under the age of 18. Addison Babbage is still responsible for acting as a reasonable person. With that said, the law recognizes context, and so you must consider whether Addison Babbage’s actions were reasonable for someone of her/his age and circumstances.

To prove negligence by Charles or Marianne Babbage, Ruffed Grouse has the burden to prove both of the following:

1. that Charles or Marianne Babbage was negligent during the time that Addison Babbage was under the age of 18; and
2. that the negligent act or omission by Charles or Marianne Babbage was a factual cause of Addison Babbage’s injury.

8. **Apportioning Liability**

If you decide that Addison Babbage, Charles Babbage, and/or Marianne Babbage was negligent and that Ruffed Grouse High School was negligent and that the negligence of the negligent parties was a factual cause of the plaintiff’s harm, you must then decide how much each party’s negligence contributed to the plaintiff’s damage. You should state each party’s share of the negligence in the form of a percentage.

Together these percentages must total 100 percent.

If you find that the total percentage of negligence by Addison Babbage, Charles Babbage, and Marianne Babbage combined, if any, is greater than 50 percent, Addison Babbage cannot recover her/his damages.

9. **Acts Through Employees**

Corporations and other legal entities cannot act directly themselves. Instead they act through their employees or agents, and they are responsible for the acts or omissions of those employees or agents.

Here, it has been determined that Teagan Eckert, Makenzie Zuse, and Dakota Turing were at relevant times acting as employees or agents of defendant Ruffed Grouse High School, and that each agent was acting within the scope of his/her agency or employment. Ruffed Grouse High School is legally responsible for the negligence of an officer or agent while the agent or employee acts within the scope of his/her employment.

Therefore, if you find that Teagan Eckert, Makenzie Zuse, and/or Dakota Turing were negligent, you must find Ruffed Grouse High School negligent to the same extent.

10. **Role of Jury – Deliberations; Unanimous Verdict, Duty to consult.**

That concludes my instructions explaining the law regarding the testimony and other evidence, and the allegations made. Now let me explain some things about your deliberations in the jury room, and your possible verdicts.

*First*, the first thing that you should do in the jury room is choose someone to be your foreperson. This person will speak for the jury here in court. He or she will also preside over your discussions. However, the views and vote of the foreperson are entitled to no greater weight than those of any other juror.

*Second*, I want to remind you that your verdict, whether it is liable or not liable, must be by a 5/6ths majority.

*Third*, as I have said before, your verdict must be based only on the evidence received in this case and the law I have given to you. You should not take anything I may have said or done during trial as indicating what I think of the evidence or what I think your verdict should be. What the verdict should be is the exclusive responsibility of the jury.
Fourth, now that all the evidence is in, the arguments are completed, and once I have finished these instructions, you are free to talk about the case in the jury room. In fact, it is your duty to talk with each other about the evidence, and to make every reasonable effort you can to reach consensus. Talk with each other, listen carefully, and listen respectfully to each other's views and keep an open mind as you listen to what your fellow jurors have to say. Do not hesitate to change your mind if you are convinced that other jurors are right and that your original position was wrong. But do not ever change your mind just because other jurors see things differently or just to get the case over with. In the end, your vote must be exactly that—your own vote. It is important for you to reach consensus, but only if you can do so honestly and in good conscience. Listen carefully to what the other jurors have to say and then decide for yourself.

No one will be allowed to hear your discussions in the jury room and no record will be made of what you say. You should all feel free to speak your minds.

Fifth, once you start deliberating, do not talk about the case to the court officials, or to me, or to anyone else except each other. If you have any questions or messages, your foreperson should write them down on a piece of paper, sign them, and then give them to the court official who will give them to me. I will first talk to the lawyers about what you have asked, and I will respond as soon as I can. In the meantime, if possible, continue with your deliberations on some other subject.

One more thing about messages. Do not ever write down or tell anyone how you or anyone else voted. That should stay secret until you have finished your deliberations.
VERDICT FORM

To the jury:

To further clarify instructions given to you by the trial judge, you are being provided with the following verdict form. At the conclusion of your deliberations, one copy of this form should be signed by your foreperson and handed to the court clerk. This will constitute your verdict.

Question 1:

Do you find that the plaintiff, Addison Babbage, has shown that it was more likely than not that defendant Ruffed Grouse High School or its employees or agents (a) acted negligently through act or omission in addressing the alleged cyberbullying of Addison Babbage?

Yes ________ No _________

If your answer to this question is Yes, Proceed to Question 2.

Otherwise, you have finished your deliberations.

Question 2

Do you find that the plaintiff, Addison Babbage, has shown that it was more likely than not that the negligence of defendant Ruffed Grouse High School’s or its employees or agents you have found caused harm to plaintiff Addison Babbage?

Yes ________ No _________

If your answer to this question is Yes, Proceed to Question 3.

Otherwise, you have finished your deliberations.

Question 3:

Do you find that the defendant, Ruffed Grouse High School, has shown that it was more likely than not that Addison Babbage acted negligently, or that Charles and Marianne Babbage acted negligently during the period that Addison Babbage was a minor, with respect to the alleged cyberbullying of Addison Babbage?

Addison Babbage Yes ________ No _________

Charles Babbage Yes ________ No _________

Marianne Babbage Yes ________ No _________

If your answer to any of these questions is Yes, proceed to Question 4.

Otherwise, you have finished your deliberations.
Question 4:

Do you find that the defendant, Ruffed Grouse High School, has shown that it was more likely than not that any negligence you have found in response to Question 3 caused harm to Addison Babbage?

Addison Babbage  Yes ________ No ________
Charles Babbage  Yes ________ No ________
Marianne Babbage  Yes ________ No ________

If your answer to any of these questions is Yes, proceed to Question 5.
Otherwise, you have finished your deliberations.

Question 5:

Without considering the amount of damages suffered by Addison Babbage as a result of the alleged cyberbullying, please identify the portion of those damages that was caused by the negligence of each of the following:

Ruffed Grouse High School, including its employees and agents  _____________ %
Addison Babbage  _____________ %
Charles Babbage  _____________ %
Marianne Babbage  _____________ %

If you did not find an individual liable in Question 1 or Question 3, or did not find that their negligence caused harm in response to Questions 2 or 4, that individual’s percentage of liability must be 0%.

The percentages you have listed for liability must add up to 100%. If they do not, you must re-assign percentages to those individuals found liable in Question 1 or Question 3 until the total liability you have apportioned among responsible individuals is 100%.

You have finished your deliberations. Please sign at the bottom of this form, then please return to the courtroom.

FOREPERSON
ADDISON BABBAGE, )
  Plaintiff, )
v. )
RUFFED GROUSE HIGH SCHOOL, )
  Defendant. )

Docket No.: CP-64-CV-113-2019

STIPULATIONS

1. All documents, signatures, and exhibits, including pre-markings, included in the case
   materials are authentic and accurate in all respects; no objections to the authenticity of the
documents will be entertained. The parties reserve the right to dispute any legal or factual
conclusions based on these items and to make objections other than to authenticity.

2. Jurisdiction, venue, and chain of custody of the evidence are proper and may not be
   challenged.

3. All witness statements were signed under penalty of perjury and were reviewed shortly
   before trial. No material changes were made to the statements.

4. All evidence was constitutionally recovered and all statements were constitutionally and
   legally obtained.

5. Trial will be on liability and the apportionment of liability only. The amount of damages will
   be determined at a subsequent trial, if settlement efforts following trial fail.

6. As ruled by the Court in its pre-trial Memorandum Order, at all times relevant to this action,
   Teagan Eckert was acting within the scope of her/his employment as the Principal of Ruffed
   Grouse High School.

7. At all times relevant to this action, Makenzie Zuse was acting within the scope of her/his
   employment as a teacher at Ruffed Grouse High School.

8. Dr. Dakota Turing was a consultant for Ruffed Grouse High School. At all times when Dr.
   Turing was on or in contact with campus and acting in a capacity on behalf of Ruffed Grouse
   High School, including when communicating or interacting with students or administrators or
   failing to do so, Dr. Turing was an agent of Ruffed Grouse High School acting within the
   scope of the agency relationship.

9. Exhibits 1, 11, and 14 were provided by Ruffed Grouse High School in discovery. Exhibit 14
   is an official Ruffed Grouse High School email transcript.

10. Exhibit 2 was sent by email to the students, faculty, and administration of Ruffed Grouse
    High School as an image attached to an email transmitted through the Ruffed Grouse High
    School’s institutional email service on or about April 17, 2017.
11. Exhibits 3 and 5 were produced in discovery by offices of the Wisawe Lark online blog. All six witnesses reviewed Exhibits 3 and 5 before trial, and all witnesses except Sloan Atanasoff reviewed them at or around the time that they were created.

12. Exhibit 4 was produced in discovery from Lancaster Online, the website of the Lancaster Intelligencer, a local newspaper. All six witnesses reviewed Exhibit 4 before trial, and all witnesses except Sloan Atanasoff reviewed them at or around the time that they were created.

13. Exhibit 8 was produced in discovery by the Performance & Mental Health unit of Ruffed Grouse High School. It had been reviewed by some member of the Performance & Mental Health unit. The Performance & Mental Health unit does not log individually which staff member reviewed what hotline calls.

14. Exhibits 9 and 10 were produced by Facebook, Inc. in response to a subpoena. Exhibit 9 was created by Addison Babbage; Exhibit 10 was not. Neither “likes” nor “comments” were captured by Facebook’s production, but direct posts to a user’s “Wall” were. The parties also subpoenaed posts in the RG MeanPersons and I Love The Eyes group and posts and comments by Facebook users PartridgeParty, RoughRuffed, and BetterThanBest. Facebook responded that the RG MeanPersons and I Love The Eyes accounts had been deleted and that it kept no records of PartridgeParty, RoughRuffed, or BetterThanBest that were reasonably accessible. No additional documents were produced.

15. Exhibit 12 was produced in discovery by Blaine Eckert. An identical copy was produced in discovery by Addison Babbage in response to third party discovery.

16. Exhibit 13 was produced by Dr. Dakota Turing through Ruffed Grouse High School. It was retrieved from the student file for Addison Babbage kept in the Performance and Mental Health Department of Ruffed Grouse High School.

Wm. Shockley
William Shockley
Attorney for Plaintiff

Claudia Shannon, Esq.
Claudia Shannon
Attorney for Defendant

Date: December 16, 2019
List of Witnesses

The plaintiff and the defendant must call each of their respective witnesses. Addison Babbage and Teagan Eckert may (but are not required to) sit at their respective counsel tables as party representatives.

For plaintiff Addison Babbage:

- Addison Babbage: Plaintiff
- Makenzie Zuse: Teacher, Anti-Bullying and Harassment Monitor, RGHS
- Sloan Atanasoff, Ph.D.: Expert Witness

For defendant Ruffed Grouse High School:

- Teagan Eckert: Principal, RGHS
- Blaine Eckert: Student
- Dakota Turing, Ph.D.: Expert Witness
Statement of Addison Babbage

Being cyberbullied is like staring at the sun: it’s relentless, unabating pain. My parents were useless. No help from my teammates. No help from my so-called friends. No help from my school, despite its supposed commitment to stop cyberbullying. Nothing. I snapped. And if it helps the next kid facing the sun, I will never be sorry.

It wasn’t always that way. I was a star at Ruffed Grouse High School and a national contender at chess, on the short track to grandmaster. I was meant to lead Ruffed Grouse’s comeback from the Jordan Simon track scandal. Sure, chess and athletics are different, but the focus, the drive, the mental training: all the same. After RG banned athletics, the kids who excelled at chess, debate, mock trial, became the top of the food chain. From 2016 through 2018, I got pats on the back as I walked the halls of the high school, and I loved the letters colleges would send me. The idea of me being bullied was laughable.

That kind of attention can get to you. I thought I was better than everyone else, because I heard it so often. If you weren’t praising me, or if there wasn’t something I thought I could get from you, I wouldn’t give you the time of day. I guess I respected my coaches and my parents, but that was about it; I would demean teachers, classmates, staff… whoever. After going 15-4 on my way to losing in the quarterfinals of the state championships during my sophomore year in 2017, I was the odds-on favorite to take the state title in 2018 and a serious national contender.

Looking back, I didn’t really have too many true friends, but it never felt that way. I guess it was the fact that I was always getting positive private messages on my Facebook account, and comments on my Instagram and Twitter posts. Getting instant accolades in the online world was just easier. I didn’t realize those were hollow. Not then.

The closest to a real friend I had was one of my classmates, Blaine Eckert, Principal Eckert’s son/daughter. Blaine and I were both trying out for the chess team and got to chatting during the fall team mixer. Our coach, Mr./Ms. Zuse, was a real stand-up person and wanted us all to be friends as well as teammates. It didn’t hurt that chess always gave us something to chat about, even if s/he wasn’t at my level. Mr./Ms. Zuse made us training partners. I’m sure if winning was Mr./Ms. Zuse’s goal, I would have had first chair, but s/he thought it was too much pressure on freshmen. Being friends with Blaine also got me the inside scoop on Principal Eckert. No one liked that two-faced tyrant. Including Blaine!

What do I mean? Well, before I got to RG, Principal Eckert gave us a private tour. S/He seemed so nice and welcoming! And s/he offered me a scholarship, even though my dad makes gobs of money, just so I would not go to boarding school. Wish I had! Anyway, because Eckert had been so nice to me, I was stunned to hear students afraid of going to the Principal’s office. But the first time I went, I learned. Principal Eckert would dole out badgering, insults, and, frankly, bullying as a disciplinary tactic like it was Friday’s meatloaf. Kids got called stupid, fat, ugly, and lazy. There was no insult that Principal Eckert was afraid to use. But the parents were okay with it, because all that “tough love” stuff plays well with older folks.

And all the “zero tolerance” policies! No drugs, no acting out, no bad grades, and no keeping secrets! I hear the last was a pure reaction to Coach Swift’s honor pledge that kept the steroid problem secret. But under Principal Eckert, if you did something wrong, you not only had to worry about her/him, but you also had to watch out for the moles – students and teachers who would rat you out to get favors from Eckert. You survived by being quiet, by being popular, or by
winning things for the school. I was probably all three. I can only imagine what it must have been like for Blaine growing up in that house with that brand of “love.”

School wasn’t much better for Blaine. S/He was mocked on Facebook, was nicknamed “the Pet” because all of the teachers seemed to favor her/him. Blaine knew who was posting stuff online about her/him, but everyone could deny it because it is so easy to create fake accounts and use fake names. Everyone at Ruffed Grouse had two profiles online, their real identity and the one they used to speak freely.

As I went through school, the cyber bullying just got worse. I saw that Morgan Pearce, who blew the whistle on Coach Swift, took a lot of heat online: insults, harassment, even death threats. But at least Morgan was away at school by then. The rest of us were stuck here.

Toward the middle of my freshman year, in January of 2016, bullying started to get out of hand. A bunch of my classmates created a Facebook page called the RG MeanPersons Club. The early posts were about teachers and staff, but that quickly changed. It became a place where kids would call out other kids for the way they looked, their weight, who they liked and didn’t like. It got so bad that three kids – Kara Eniac, Andrew Bacus, and Sally Gunter – transferred during Spring Break in 2016 out of Ruffed Grouse. The sad thing is that bullying follows you. Once the kids at Wisawe High found out about the online posts, the harassment started right back up again. Last I heard, those kids formed a homeschool. I know they complained to the school board, which did nothing, of course.

When a few of us finally opened up to Mr./Ms. Zuse about the RG MeanPersons Club, Mr./Ms. Zuse tried everything to shut it down. S/He reached out to Facebook directly, but was told that the language used did not violate their policies. I heard through Blaine that Mr./Ms. Zuse even tried to speak to Principal Eckert, but that never went anywhere. Back then, as long as the bullying didn’t happen in school, nobody cared.

That changed when Lynn Conway, who was a year ahead of me, disappeared. It was one of those dates – April 17, 2017, that you always remember where you were. The note she wrote sounded like she might be coming after us all, and I knew that I had been one of the many kids who didn’t treat her right. Lynn was super smart, but people would call her nerd, dork, and say that no one would ever date her. Lynn was way into computers, and she was able to unleash a computer virus by IM’ing the people who were bullying her online, totally wiping their laptops, cell phones, and computers. After that, she was a target online and at school. I am ashamed to admit that I joined in, too. I used a fake ID like everyone else – BetterthanBest. Because everyone was in on it, Principal Eckert and Ms./Mr. Zuse never knew it was happening. Not until that note. People thought it might mean she was going to shoot up the school. I never bought that – not her style – but the problem was that no one could find Lynn. She totally disappeared. So I guess you can’t be too careful.

Or maybe you can. Principal Eckert totally overreacted, acting like there was an active shooter in every bush and a homemade bomb under every desk. There were police everywhere, FBI, you name it. S/He called an assembly, and they searched every locker while we were stuck in the gym. There was even talk of polygraphing everyone for “violent tendencies.”

Turns out that Lynn got help, was not violent, and moved to Portland or something. The night after the Lark carried Lynn’s story, complete with her quotes tearing into the administration, I was over at Blaine’s house hanging out after chess practice. We overheard a conversation
between Principal Eckert and I guess someone from the board of trustees. The morning there
had been a scathing Op-Ed article in the Wisawe Times calling for Principal Eckert to be fired.
Principal Eckert was snarling with rage, hurling insults at Lynn and saying stuff, like, “I can’t
believe that little dweeb is going to ruin me because she couldn’t take the heat. She was always
a loser. A loser! If she wanted to take herself out of the equation, fine, but don’t take down
innocent people in the process. Ruffed Grouse is for winners. We are fine if losers like her want
to leave. Just have the courtesy to slink off into obscurity in silence.”

The next day, April 25, 2017, the school held a general assembly to announce a zero tolerance
policy for cyberbullying. A big list of promises was made, and Dr. Turing went on and on about
how the school would help kids who were feeling bullied. Then Principal Eckert gave this long,
kind speech about how great a person Lynn was. It made me sick. How could the same person
saying these serious words have demeaned Lynn so badly the day before? Also, how could
they enforce what happened online? Kids and technology move faster than any middle-aged
teacher could. Some shrink talking to us about our feelings wasn’t going to make it go away.
Dr. Turing didn’t have much to do, so we were constantly sent emails about eating habits or
yoga or blowing bubbles or the anonymous hotline or whatever.

I did, however, get a bit more insight from Blaine about a month later as to how Principle Eckert
planned to stop bullying. Principal Eckert created her/his own online anonymous online profile
and was posing as a student to see what was being said about the school and the students.
Blaine swore me to secrecy but told me the username was PartridgeParty. When PartridgeParty
sent me a friend request and also asked to follow me on Instagram, I accepted. I couldn’t let
Eckert know I knew, you know? Really, the posts were kind of lame, definitely what you would
expect from an adult. Mostly about going to this or that school function or hanging out after a
pep rally. No bullying. Not then.

So things were ok, at least for me personally, in my junior year, through 2017 and early 2018. I
was winning match after match, I was interviewed by the local paper, and I even appeared on
the Sports Illustrated website as a teen to watch. An admissions officer from Penn suggested I
was looking at a full ride if I managed to win the Regional Championship. The pressure really
mounted. Principal Eckert even called me into her/his office to me how much it my success
meant to the school. S/He said that “Winning is the only option.”

Then the Eye happened.

My father had bought some land build our new home in early February 2018. It was a few acres
on the outskirts of town, but it was home to “The Eye,” which was this stupid rock with a bunch
of graffiti on it. It had been a teen hangout since the ’50s, and the previous owner just let the
kids do whatever they wanted there. When my dad put “no trespassing” signs up, the
community reacted. Kids started wearing “Save The Eye” t-shirts and “I <3 The Eye” eye
patches. I could handle that, but when my long-time boy/girlfriend Bobbie Noyce dumped me in
early March, I was devastated. It sank in: I was the outcast, I was the victim.

Next came the “I love The Eye” group on Facebook, which hooked up with the RG
MeanPersons Club to unleash a stream of hate at my family and me in particular. Even
PartridgeParty started posting negative comments. I started noticing a hashtag -
#mightyhasfallen – showing up with every negative comment about me. That made it so anyone
could find all of the nasty stuff really fast. I was devastated. The comments ripped me at my
core – they talked about how my money not my skill got me to the top of the chess team. They
talked about Bobbie dumping me. They called me ugly, unskilled, unlikable. Even Mr./Ms. Zuse said there was little s/he could do. I tried to take matters into my own hands and reported all of the harassment through the school bullying hotline. And even that was just a stupid automated recording, not a real person who could help me. I made my report anonymous, because I didn’t want to be labeled a snitch on top of everything else. No one called or followed up. Nothing changed with the negative posts. Nothing. I was on an island.

In March, my Dad managed to get Dorsa Derakhashani, who is like, the coolest young chess master, to come and give a masterclass at Ruffed Grouse. As captain, I organized the event. Oddly, Blaine didn’t want to have any part of it. S/He said that the new Overwatch league was starting and s/he wanted to watch it on Twitch. Blaine was sitting in the 2nd chair! But, wanting to keep any friends I had happy, I left Blaine off the scrimmage roster with Dorsa. While the class was great, leaving Blaine off the roster really upset Principal Eckert, and I was actually stripped of my captainship for “abuse of power.” I was really upset that Blaine didn’t set the record straight. That coward could never stand up to her/his mother/father.

In April, things got so bad that I decided to visit Dr. Turing for counseling. Dr. Turing was never in her/his office during office hours or even after school, but on April 16th, right after an exam, I passed Dr. Turing in the hall and asked for a meeting. I met with her/him the next day and before I could even start to tell her/him what was going on, I broke down in tears. I mean straight-up bawling. But, rather than being consoling, Dr. Turing said something like, “Geeze Addison, I expected more strength from someone of your background and ability." Like it was my fault this was all happening. Dr. Turing even said that I should stop crying and stand up for myself. I demanded that Dr. Turing file a formal report with the school. That was the first step of the school policy. But instead, s/he said I should come back in a couple of weeks before taking such “drastic steps.” S/He also suggested weekly counseling, but I didn’t want to subject myself to more insults. I got enough of that online, thank you very much. At that point, I knew that Dr. Turing was useless. I asked Mr./Ms. Zuse to file the formal complaint for me, and s/he agreed.

But, really what is a paper complaint worth in an online age?

Blaine had been one of the people trying to get me to go see Dr. Turing. But when it did not go as expected, I just let it go, saying that I was fine. I know that was a mistake. But it felt like Blaine was my only friend at that point, and we had barely spoke since the whole masterclass incident. The last thing I needed was Blaine letting Principal Eckert know that I wanted counseling. Eckert would see that as weakness, and I could have lost my 1st Chair!

By the state finals in May 2018, I had nothing left. I somehow managed to win the championship round, even though I could barely concentrate. I thought the win would rally the school around me again, but even though people were nice to my face, online, the harassment continued. The thought of competing at regionals filled me with dread. I wanted to get out of the way – to become anonymous. I lost weight, and couldn’t concentrate on anything of importance. My grades suffered. My game suffered. So much for the school’s zero tolerance policy on bullying.

The regional finals were set for the week of May 21st, a few days after the AP English exam and the week after AP U.S. History. I traveled with the team, but I couldn’t leave my hotel room, and the team had to forfeit my match. I thought that would get everyone to leave me alone, but it was the opposite. People turned on me even harder. The messages were nasty, and the nastiest of them all came from PartridgeParty. PartridgeParty was directing people to a new page that was supposedly me, but really was just a fake profile to say terrible things. I even
tried to chat to Blaine, but s/he said that we didn’t need to talk in person and that s/he would get her point across online. On May 18th, I tried to find Dr. Turing to raise the issue again, but s/he was not in her/his office. Of course.

Then came what I was dreading most. Principal Eckert called me into her/his office and flat out berated me for almost a full hour about how I let the school down and didn’t understand what it meant to be a Partridge. With each cutting word, I fell deeper and deeper into despair.

A couple weeks later, a few days before graduation, nothing had happened to stop the bullying. That stupid policy wasn’t worth anything, and even Ms./Mr. Zuse was powerless to help. Someone said something on the fake-me page, and I snapped. I deleted my anonymous account – what was the point of keeping a bunch of insults about me? – and I grabbed a sledgehammer from our landscaper’s shed. While everyone was doing graduation rehearsal, I went to the chess lab and started swinging away for as long and as hard as I could. They tell me I did almost $100,000 dollars in damage.

I was taken to the local mental hospital for treatment. That is what probably stopped the cops from pressing charges – that and the fact that the school didn’t want to have to keep the issue in the local news cycle. Principal Eckert had me suspended and was going to have me expelled. But my father had finally realized that the bullying was real and that I needed my parents’ support. I ended up meeting a psychologist who actually cared – Dr. Atanasoff. Dr. Atanasoff helped be find balance again and gave me a plan for getting my life back together. Ultimately, my father donated the “Eye” land back to Wisawe and we moved out of the area. I am in the process of changing my name so that I can enroll in a boarding school for my senior year and get a true fresh start, probably in the fall of 2020. Fortunately, I am doing a lot better now. Still, I know I would not be in this situation if the school had just held up its end of the bargain and protected me when I needed it most.
Statement of Makenzie Zuse

Grand master Simon Williams – you might know him as the GingerGM – once wrote, “The beauty of chess is it can be whatever you want it to be. It transcends language, age, race, religion, gender, and socioeconomic background. Anyone can enjoy a good fight to the death over the chess board.” I used to believe that, back before Teagan Eckert came to Ruffed Grouse. But the truth is that the same inequality that warps our neighborhoods and divides our culture also warps the 8 x 8 grid I love.

Or maybe I was just fooling myself all along. I came to Ruffed Grouse to teach Literature in 2004, not long after I graduated from Penn State with dual degrees in Anthropology and English. It was an odd mix – me, from the rough parts of Reading, heading to the wealthiest private school in Laurel County, but what can I say? I don’t mind studying a new culture, and Ruffed Grouse sure could use a little diversity. Maybe I didn’t fit in at first, but I made my place.

The common denominator was chess, the game of kings my grandpa played in city parks for $5 a game on a 5 minute clock, sometimes running two or three boards at once. “QB” they called him, not because he threw touchdowns but because he once ‘mated a master at an exhibition using the queen’s bishop, which is no easy thing. I learned the game at his knee.

When I interviewed at Ruffed Grouse, the old Principal, John Napier, had a board in his office, playing out a game over email. I have a suggestion on his rook placement, one thing led to another, and I was a Partridge… and the Chess Club moderator.

Everything was pretty chill until the Jordan Simon tragedy. Between the state ban and the negative publicity, we could not be an athletic power anymore. Not that we left competition behind. Parents here aren’t happy unless their kids are tops at something, resume-building. So when the Board of Trustees let go of Mr. Napier, Teagan, Eckert came in with an academic competition mentality. State of the art science and robotics labs for the Olympians and FIRSTies, debate training from consultants and a Laurel U professor of rhetoric, heck, even a suite of Alienware desktops for the eSports club.

Where did the money come from? Donors, of course. Ruffed Grouse has a reputation for feeding the Ivies, and not just Kalmia, either. Plenty of folks were willing to help the endowment if it meant guaranteed admission for little Johnny or Susie. You’d think some of that money would have gone to faculty salaries, but that mattered less than filling the trophy case… excuse me, filling the Lovelace Family Display Center for Recognition of Excellence. I guess I shouldn’t complain too much; that money also meant a few academic scholarships for talented kids from places like my home.

Still, the emphasis was not on education. It was still on winning. That was the Eckert way, and honestly, the Ruffed Grouse way. No quarter given, no expense spared to recruit and train the best. Addison Babbage might have gotten in anyway, because RG doesn’t reject kids whose dads are CFOs for Fortune 1000 companies, even when their mothers aren’t New York Times columnists like Marianne. But Addison was a prodigious chess talent, operating at an entirely different level. There’s no knowing if Addison could have won U.S. Nationals or been a World Champion; those things take years of practice in addition to your natural ability. But to see that kind of natural ability? It’s once in a lifetime. And the second Addison won the PA Juniors, Teagan Eckert targeted the Babbages. Eckert went to junior tournaments, sent personal notes
to Addison, even started looking into remote learning options for the Chess Club to talk and play
with masters around the world.

Sadly for Addison, it worked. Winning was irresistible for Charles Babbage, whether in business
or at home. From the time that Addison committed, s/he became the focus of the Chess Club,
and I became the focus of a great deal more of Teagan Eckert’s attention. Where once we had
thirty members, none of them especially good, but all of them happy, soon we had only the ten
or twelve of the most competitive students coming, and all the attention and resources were
going just to the top five, because only your five “chairs” can score points at tournaments. One
day, a chess library just appeared in the club room, courtesy I’m told of the Babbages. Rumor
had it that our Wednesday afternoon practice games – our practice games – were reviewed by
coaches from the competitive junior chess circuit via email.

Our rise was meteoric, and all it cost was our soul. We went from a casual team to second in
the state in a year. Principal Eckert was there for States, and do you know what s/he said
afterward? “This was a fine start for this program. We are proud of what you accomplished,
even if the real goals remain unmet.”

This for a program that never finished higher than a regional runner up! By the time I reached
my desk the next morning, Eckert had emailed me the schedule for next year’s U.S. Nationals,
complete with proposed travel plans. I was stunned, but I was even more stunned when I saw it
had been forwarded… from the desk of Charles Babbage! Addison was a Sophomore, barely of
age even to compete, and Babbage had her/him slated for a board in Minneapolis. A couple
months later, every team member got a new iPad, preloaded with a half dozen simulators.
There was no sender listed, but the note with it read “To make sure there’s no summer slump.”

This was getting way too intense. But when I raised the issue, Eckert cut me off saying,
“Pressure? What do you think turns coal into diamonds?” When I tried to explain it made a lot
more coal into dust, s/he just waved me off, saying I could call it “inspiration” instead of
“pressure.” Like semantics were the point.

Maybe it’s because Blaine was now the second chair. Blaine was a good kid, the kind of “play
chess in the Scouts on campouts” kid we used to have in the Chess Club. I figured s/he would
last a month or two, but s/he stayed and worked hard, tracking her/his games religiously. Only
later did I learn from Blaine that Teagan Eckert had been a masters-level player, and s/he was
reviewing every move Blaine made! I almost confronted Principal Eckert about it, but at the
time, the bullying issue was getting attention, and I know better than to talk to Eckert when the
news is not good.

Look, bullying has been an issue in education since the one room red schoolhouse. I learned to
dodge it or how to fight it. I guess that’s not the way things are handled on the right side of the
tracks, because Ruffed Grouse was like Mean Girls, only without Tina Fey to make it clever.
Students scrambled and clawed for every ounce of social status, from the best house to the nicest
car, the most ridiculous vacation, the latest shoes. Some students – including Addison – even
took shots at me behind my back because I had “only” gone to Penn State honors. For them,
going to college for free was an insult! Small wonder that Pride and Prejudice went over so well
when I taught it, but Native Son was barely tolerated.

Things started to take a turn in the Fall of 2016 with Kara Eniac, Andrew Bacus, and Sally
Gunter. I had them for homeroom, and I saw them as the year went on: late for class, avoiding
passing people in the halls, lack of eye contact…. I was worried, but I couldn’t get anyone to
give it attention, not even the school psychologist, Dakota Turing. Then they left, and they
made a stink doing it, writing a letter to the state Department of Education that started an
investigation and getting in the papers. The media loves a “rich school is bad” story.

In response to the state investigation and the departure of those students, Vice-Principal
Shockley tapped me to become one of our Bullying and Harassment Program monitors. I got a
reduced teaching load – which Principal Eckert said would give me more time for chess! – and
several weeks of training in detecting harassment, crafting policy, and enforcement. The
problem was we didn’t have a very clear or effective anti-harassment policy, so my enforcement
responsibilities were not especially clear. Eckert even shelled out for me to travel to Carnegie
Mellon for a weeklong seminar on social media and computer forensics.

Those seminars are where I learned how wrong I was to think of bullying as a normal part of
growing up. I started to realize that Kara and Andy and Sally were victims of cyberbullying. In
fact, I got so interested in it that I looked into Facebook and Instagram archives to find out what
really happened. Sure enough, we never saw any bullying at school because it was all online. I
wrote it up as a case study that was published by the School of Education at Rowan University.

Over that summer of 2017, I created Facebook and Instagram accounts under the name of
“Maggie Hamilton,” who appeared to be a Sophomore at Ruffed Grouse. Using a few pictures
from student webpages, and relying on my training in anthropology, I built out her identity. I
made a couple posts complaining about the cafeteria food, intentionally messed up some
spelling, totally ignored the rules of grammar. Unfortunately, none of the students at Ruffed
Grouse started friending or following me and I gave up on the idea.

I also helped craft an anti-bullying policy, but it wasn’t getting much traction. Principal Eckert told
me it was a waste of time and that I should focus on the chess team if I wanted my contract
renewed! Then came the terrible thing with Lynn Conway. I don’t think anyone quite realized
how bad it was for Lynn. She was getting counseling at the school, but then she disappeared
and we all feared the worst. I spent the week realizing that I should have seen the warning
signs, the name calling, the threats, the blame, the disgust. I missed Lynn’s attempt to fight back
and the ultimate backlash that must have created her ultimate feeling of helplessness. I was
beyond relieved when we heard that the school misunderstood her note, and I’m glad she got a
fresh start out West. I hope her new life is better for her.

Lord only knows how much more psychological damage was done by Principal Eckert locking
the place down like Guantanamo Bay for the week it took for Lynn to re-emerge. Or how much it
cost the school to pay for the extra security.

However, at least Teagan finally installed my cyberbullying policy. Some of the stuff in there was
pretty cutting edge. From the anonymous tip line to making cyber bullying an issue for our
Performance and Mental Health team, it was beyond a policy, it was also a pledge. The
response from the community was amazing and I think it is what saved Teagan from getting
fired. If only we’d known that it was all lip service.

Of course, even I had no idea Addison was going to become the school’s next cyber bullying
target. Addison was the quintessential Partridge: rich, entitled, and socially perfect until s/he
wasn’t. Addison excelled just the right amount: a legend in chess, good in the sciences, and
artificially lazy enough to scrape by in English and History. Top fifteen in the class, but never,
ever top five. Even her/his small social missteps got other students jealous, like when s/he got a Mercedes convertible for her/his first car, instead of something sportier. Or a hybrid. Those are the trendy social climber picks these days. And from watching the chess team dynamics, I can tell you that Addison also made sure to cut others down, just enough so that they could not threaten her/his social standing. I couldn’t really see what Addison was doing online, but I could tell Addison was definitely a contributor to the harassment. But no one deserves the onslaught that followed over the course of the Spring term in 2018.

Look: I don’t know what’s so special about a painted rock. In a community of cultivated lawns and well-maintained parks, I have to imagine that there’s some other place that kids could go to make out or whatever. But I can tell you that the second that the word got out the Babbages were building their castle in those woods where The Eye lived, everything fell apart.

The online component of the “I Love the Eye” campaign was mostly positive at first, with people putting up pictures of themselves and their friends at the Eye over the years. But it’s the internet, and we can’t have nice things, so there were some nastier comments directed at the Babbages. I sent a report to Principal Eckert and Vice-Principal Shockley, but nothing ever came of it, as far as I know.

Even so, Addison walked every day around a school where a bunch of students were wearing “I [heart] the Eye” eyepatches. Still, s/he kept winning chess matches, and her/his grades were fine in my classes. And as far as I could tell, s/he and Bobbie Noyce were still an item. Even so, over time, Addison spent more and more time alone in the new Chess Lab that had been donated: five high-quality computers with databases of millions of games and pre-paid subscriptions to a half dozen competitive chess websites. Self-isolation is definitely something that I think is associated with depression.

Even with the extra work, Addison was plateauing. Blaine, though, was a revelation. I guess Blaine just needed time to mature, because s/he started putting up elite level results. S/He didn’t look happy to me, but the one time I tried to talk with her/him about it, I got a note the next day from Principal Eckert to stay out of “family business.” What could I do? I also emailed Eckert around that time about Addison, but that didn’t get me any further.

In March, Charles Babbage managed to get Dorsa Derakhashani to come to Ruffed Grouse for a masterclass. But I left the roster to Addison, as captain, and Addison left Blaine off. Principal Eckert was livid and made me take away Addison’s captainship. I had no choice, but I don’t doubt that the actions contributed to Addison’s isolation.

I continued to monitor social media using the techniques I’d learned, and in April 2018, things seemed to take a turn on the I Love the Eye group. PartridgeParty was getting more and more active and growing harsher and harsher with her/his criticism of Addison. I checked PartridgeParty’s friend groups, and I saw one called “RG MeanPersons Club.” I hadn’t heard of that, but I sent a friend request and “Maggie” was let in, after I took shots at Makenzie Zuse and Principal Eckert. I also had to post about a couple students to be “mean enough.”

I felt bad, but it had to be done. PartridgeParty was a nasty, classic cyberbully, picking the easiest things – Addison was rich, Addison was a nerd, Addison’s parents were bad people – but Party also went much further. There was a series of posts hashtagged “#mightyhasfallen” which charted every social slight Addison suffered or dumb comment s/he made in class and, for all I know, some that Party made up. Other posts said awful things about Bobbie Noyce.
Still others encouraged students to “take the Eye fight where it belongs” by taking insulting or frustrating Addison. Addison was part of the group, so s/he was seeing all of this.

I set about finding out who was behind *PartridgeParty*. Using some publicly available data mining tools, I was able to determine the IP address from which *PartridgeParty* was posting. I was able to find other times that IP address was used within that seven-day period, when it would have been assigned to the same person by the Internet Service Provider. The same IP address as *PartridgeParty* was using commented often on chess message boards and was one of the addresses assigned to RuffedGrouse, but not to any of the campus academic buildings.

I confronted Blaine about it, and Blaine responded angrily, “So what if I am? What are you going to do? It’s not like the Principal is gonna expel me!” I was stunned, but I documented my findings and Blaine’s response. Principal Eckert responded with an email that I have provided to Addison’s lawyers. Blaine was never suspended, and s/he was not sent to the anti-harassment training. As a Monitor, I would have known.

Addison had been looking worse and worse, losing weight, fidgeting during matches, making uncharacteristic mistakes that had to be redeemed by hyper-aggressive play. Any time I would bring it up with the Babbages or with Principal Eckert, though, it was chalked up to the pressure of competition and college applications. In order to qualify for the U.S. Chess Foundation developmental program, Addison had to win the state and finish in the top two at mid-Atlantic Regionals. Addison did seem better for a couple days after s/he won the state in early May. Not happy, mind you, but a bit better.

After Addison told me in late April about her/his visit with Dr. Turing, I reported the harassment to the executive administration for a third time, this time in a formal complaint. I got responses, but nothing like Zero Tolerance. I thought about taking things further. I could have referred Addison to Dr. Turing again or given her/him additional counseling, but I sincerely did not think it was a mental health crisis at that time. Honestly, looking back on it, even knowing what I know now, I still don’t think we missed huge warning signs or whatever. Of course, it was hard to tell, with the stress of the mid-Atlantic Regionals coming in mid-May and AP exams in full swing. I wasn’t myself either!

At Regionals, Addison stayed in the hotel during meals, playing online. S/He skipped the fun events put on in the evenings, but in the mornings, s/he didn’t seem any better rested. I probably should have called Dr. Turing, but it didn’t occur to me, and I doubt the Babbages would have allowed Addison to get counseling anyway. Never show weakness and all that.

When s/he walked away from the tournament, I was relieved, even though it cost us a team title. I never imagined Addison would trash the Chess Lab and get kicked out of school. I see tons of students under absurd parental and societal expectations; we act like they’re adults, and they’re only teenagers! But I thought Addison would be alright, right up until s/he wasn’t.

After the incident, I had my end of the year meeting with Principal Eckert. After about 15 minutes of incoherent yelling, I was relieved of my duties for failure to defuse Addison and failure to win regionals. And of course I was fired. I miss the team, and I needed the extra income. I tried to get a similar position at other schools, but Principal Eckert refused to recommend me as a coach, which killed my chances. It was completely unfair; I always acted reasonably when I was dealing with Addison or the cyberbullying. I wish I did more, in

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retrospect, but I did my part just fine. Looking back on it, nothing I did was negligent. I wasn’t the
one who missed signs or dropped that ball on discipline. That was all Eckert and Turing.

I also wish I could show you the terrible things that RG MeanPersons said. But when I checked
Facebook a couple days after the chess lab disaster, the whole thing had been wiped off the
internet. I’m glad I don’t have to revisit the harassment, but it would have been good to have.

But I guess that’s how things always end. You never see the checkmate coming.
Dr. Sloan Atanasoff

There is a difference between a goal and a dream, between a hope and a strategy, between a plan and its execution. That is the difference between Addison Babbage experiencing massive success as a chess champion and her/him shattered, trying to cement together the broken pottery of that once-promising mind. Every parent, every teacher, they all have ideas. But many of them can’t walk the path they have laid out. Or they fail to anticipate the threats the modern world poses to children whose development will not be complete until they are in their mid-twenties. Sadly, the gap between intention and execution also keeps me in business.

I am a child psychologist and Individual Education Plan consultant, in private practice here in Wisawe. The ways in which Ruffed Grouse High School failed Addison Babbage are not new, but they are real.

I originally became involved in Addison’s care in mid-2018, not long after Addison had been released from psychiatric custody. I had met Charles Babbage a decade or more ago, when his niece, Katherine, entered Ruffed Grouse. At that time, I was the Vice-Principal, and I maintained a focus on children with learning disabilities or mental health issues. That has been an interest of mine for years. I received my undergraduate degree in psychology from the University of Pittsburgh in 1980. Student mental health was less advanced then, and I wanted to work in that field. I sought and received master’s degrees in education and psychology in 1983, and I completed a doctorate in psychology in 1986, all at Villanova University. Throughout my education, I focused on special education students. After five years in the Harrisburg School District as a special education coordinator, I joined Ruffed Grouse, first as a teacher and counselor. In 1994, I became the head of Counseling and Performance, and in 2007, after I completed a term as a Member of the Pennsylvania State Board of Education, I was named Vice-Principal. From 2012-14, I served as the Strategic Liaison for Professional Development of the National Association of School Psychologists.

Returning to the thread, I don’t mind saying it, because Charles has been quite open in his fundraising efforts about the fact that Katherine struggles with autism, and I worked closely on her curriculum design and support. At that time, Ruffed Grouse was not as competitive as it later became; we had an athletic program that recruited, of course, but for most students, it was an ordinary, if elite, school.

When the new administration came on board in 2015, I was told that my services were no longer required, and I opened a consultancy, helping parents develop individual education plans for their children. State law requires that these IEPs be created for students in specified categories, and tailored, individual goals and resourcing is critical to helping these students find success in the public school system. I focus on students with mental issues, and help define the services those students will need. I also do some consulting work on behalf of students who are particularly gifted, ensuring they receive the enrichment they require. Where necessary, I can also act as an adversarial expert in litigation or administrative proceedings. I have done so on approximately a dozen occasions, always representing parents. I have separately consulted with school districts throughout Pennsylvania to design IEPs, and although I have not had to testify as an expert for any of them, I like to think that’s because my work prevented the litigation from being necessary. I am paid $5000 for such consultations, and I’ve been paid approximately $20,000 for my work so far with Addison, both in counseling and in litigation. In preparation for trial, I reviewed the statements of the other witnesses and Exhibits 1, 4, and 6-12.
But I digress. Charles called me shortly after Addison was involuntarily committed to a mental health facility for three days of psychiatric evaluation, hoping I could assist in freeing Addison. I had to explain that not only could I not, and I would not, because the psychiatric hold would provide valuable clinical information, and no one could say whether Addison really was a danger to her/himself or others. Charles didn’t like what I had to say, but I think he appreciated that I held my ground, and a few days later, he brought Addison to see me.

From the start, it was clear to me that Addison was no risk to her/himself or others; s/he was a normal teen who had been through a traumatic experience. At first, Charles and Marianne were confused, even skeptical about my diagnosis. They thought that something must have been profoundly wrong with Addison, a psychotic break or multiple personalities or something else out of a horror novel to have caused the madcap destruction of the chess lab.

Sadly, underestimating the potential impact of bullying – especially cyberbullying – is all too common. Most people of a certain generation – mine, or perhaps mine and one more – experienced bullying, and so they view it as a natural part of growing up. Yet, the physical torment – the wet willies, the rear admirals – we experienced may actually be less damaging than modern cyberbullying. In our day, a bully or bullies would move on to another victim after a period of time. This embarrassment might wane with the other insults of youth, being picked last for gym class or social isolation in the school cafeteria. These things hurt, but they fade.

And they can be escaped. A child involved in a fist fight at school can go home, talk with his or her parents, recreate in various ways, and perhaps return the next day to re-engage with school social life. Students of this generation do not have that refuge. Instead, the very activities in which they would engage to connect with their peers and decompress – checking social media, messaging with friends, watching age-appropriate videos online… all of these things can become polluted by the bullying. It is the equivalent of if, in my generation, your bullies could call you all night long, repeating their harassment and leaving recordings for others inclined to bullying to find, just in case they had missed the harassment the first time around.

Social media also gives bullies and harassers a far louder voice. In prior times, communication was conducted largely on a one-to-one basis, and the messages of harassment, intimidation, or discrimination could only spread as quickly as individuated communication could carry it. Now, by contrast, a single user of a single computer can spread bullying or harassing messages to dozens or even hundreds of other users with a few keystrokes, and that harassers’ allies, ideological fellow travelers, or sycophants can boost that signal to hundreds more with even less effort. Social media gives those with the worst impulse control the greatest megaphones, compelling attention from listeners who would in prior generations never have given heed to their rapid, hurtful messages.

Worse still, social media allows individuals quasi-anonymity. This feeling of freedom from the bounds of normal social conventions empowers the worst impulses, leading people to say things online that they would never risk being associated with their real identities. As just one example of the difference, when peoples’ terrible online speech can be identified and shown to their bosses, they are often fired. That's just one example of how obviously inappropriate online speech is to most of polite society. In the context of Ruffed Grouse, the analogy may seem a bit gauche, but social media is social bullying on steroids.

These factors also make the internet incredibly challenging to police. Parents face near-insurmountable issues trying to keep up with their kids’ internet use, and schools cannot be
expected to run down every online threat or ill-executed comment. The police can barely handle serious, undisputed criminal activity online, and schools don’t have the ability to subpoena records and the full cooperation of internet service providers.

With that said, there’s a lot that schools can do. The first is to put in place an active anti-bullying program that includes addressing cyberbullying. I don’t have much in the way of specialized education or training in that area, but I do have some experience reviewing these policies in a few districts with which I consult. I thought Ruffed Grouse’s new policy – the one written by Dr. Turing after I was let go – was adequate, if a bit draconian and over the top.

I know, it’s odd, right? The plaintiff’s expert, saying the policy went too far? The thing is, when a school makes a policy, it has to follow through. A policy is an obligation that they have undertaken to their students and/or their parents, and an obligation like that is legally enforceable. In addition, if the school does not follow through on something it has said it would do, it undermines the student confidence in the importance of the area in question. That’s human nature: if authority figures don’t seem to care, then it can’t be that big a deal… right?

In fact, in some ways, identifying it as a problem and then not following through is worse from a mental health perspective than not identifying it at all. At least if it is not identified, the victim believes that coming forward may bring relief. When the problem is being obviously ignored, or the response is minimal, that is an affirmative choice, and victims know that meaningful action will not be taken to alleviate their torment. That leads to feelings of powerlessness and hopelessness that contribute meaningfully to the development of long-lasting anxiety disorders. Ruffed Grouse took this to an entirely new level by not only making a policy, but a pledge to keep the students safe from the harm of cyberbullying.

Zero-Tolerance policies are also problematic, even when they are enforced. They remove any chance for re-education, for improvement of the person. By putting the school in an immediate, adversarial relationship with the student as “bad guy,” zero-tolerance policies can take away the opportunity to give a second chance, where one is needed. It is much better to design a flexible policy that allows experienced administrators to make sensible decisions based on the facts at hand. Ones like the policy I had in place at Ruffed Grouse before I was fired.

Put these together and you can understand that it is a terrible idea to do a zero-tolerance policy at Ruffed Grouse, which is a tuition-dependent private school, reliant on donations and non-scholarship tuition to make ends meet each year. That means it is reliant on the goodwill of the Wisawe community, especially the wealthier parts of the Wisawe community. Sometimes that means accommodating a student who has broken a policy, but who is connected to an important member of the community.

I can’t give any names, of course, but as Vice-Principal I made several exceptions to our Honor Code for students. Sometimes that was because those students had legitimate excuses, like one of our students who had a firearm on school property, but it was locked in his pickup in the parking lot, without ammunition, after an early-morning hunting trip with his grandfather. Under the literal terms of the policy we created after the Columbine massacre, that would have been an automatic expulsion. Another student could have been kicked out after a violent altercation, but she had recently been forced to switch medication, and the behavior was out of character.

Sometimes, though, the exception was less because the student made an honest mistake and more because of who the parents were or what they could contribute. I’m not proud of all of
those choices, but I’m not ashamed of them, either. We did what we had to do to keep the
doors open, and sometimes that meant that we did not throw the book at a student who
deserved it. Keeping parents happy meant scholarship money for other students, support for
our programming, and a pipeline that sustained the school. There are no perfect choices.

So Ruffed Grouse set itself up to fail with the Eckert-Turing policy changes, and it’s no surprise
that they were hoisted on that petard. If you make a zero-tolerance policy, you have only two
choices: enforce it, or change it. They didn’t want the political fallout from changing it, so they
just disregarded it. That undermines the credibility of the policy and further hurts students like
Addison, who believed that the administration would protect them.

And that led to the result you might expect. The smallest things can change teen peer groups,
and there are many teens who delight in the fall from grace of a formerly-popular classmate.
One need only look to television or film to see how much teens crave a story where the
comeuppance strikes the popular boy or girl.

Unquestionably, Addison was in such a position at the beginning of 2018: held up as a model
student, poster child for the school’s flagship academic program, friends with the principal’s
child… s/he had all the hallmarks of a social alpha. That meant an ever-increasing pressure to
perform, which leads to fragility. That fragility was manifest once the issue with the Eye – a
popular student hangout – arose. Suddenly, Addison was cast as the villain in a John Hughes
film, the spoiled rich kid. Worse, Addison had very little experience with that kind of invective,
and so s/he had not built up coping skills. It’s often harder for the popular who fall from grace
than it is for students used to being on the fringes who ascend the social heights, then fall. The
latter are used to dealing with social slights, and they have figured out how to handle them
without cracking. They have been hardened to a degree by past exclusion. A student with
none of that experience has none of that capacity, and very little in Addison’s sheltered,
arguably pampered upbringing prepared her/him for the slights and insults of social media.

Ruffed Grouse should have recognized that, and they should have taken it more seriously once
it was revealed. At the very least, counselors should have spoken with each of Addison’s
teachers personally to determine whether the issues were manifesting in any way. Then a
comprehensive program for Addison’s care should have been initiated, the very first portion of
which should have been an investigation into shutting down the MeanPersons group or
disciplining students who participated in it. Addison should have had regular counseling with a
psychological professional, and any professional worth his or her salt would have seen to that
personally, not pawned it off on a subordinate, lesser-trained individual. That’s especially true
for a school like Ruffed Grouse, with its pride in maximizing student performance. What kind of
performance optimizer fails to notice a massive stressor in a student’s life, fails to address it,
and expresses surprise to the student that the student wasn’t stronger? That’s the textbook
opposite of how to handle that situation.

Naturally, these failures led to consequences. Addison piled stressor upon stressor atop
her/himself, and when the zenith of those stresses loomed – the biggest chess tournament of
the year – it became more than s/he could handle. Addison is a teenager, and s/he cracked.
That is neither shocking nor unforeseeable. And what did Ruffed Grouse do in response?
Virtually nothing. No additional counseling, no interdiction of the MeanPersons group, no
administration statement of support… they just let it get worse and worse. There are allegations
that the Principal commented personally in ways that are flagrantly inappropriate, but even if
those are unfounded, it was grotesquely negligent to ignore the formal complaint from Makenzie Zuse in May 2018.

If you take a teen who is compromised mentally and you allow further harassment, further abuse of that teen online, and if you do literally nothing to assist that person, to help her/him cope... well, that's a recipe for cooking up a serious mental breakdown. That's what the science says, and that's also common sense. Have you heard the expression, “pushing someone past the breaking point?” Well, what do you think is going to happen when you push past the breaking point, and then you keep going? That's what happened with the fake “Addison Babbage” Facebook identity, complete with reference to mental health that is quite literally barbaric. An anxiety disorder is nothing of which to be ashamed. Neither is a panic disorder. Neither is finding one’s limits. All of these issues can be addressed with meaningful care and/or medication. None of them ought to lead to further harm.

But with the way unreasonable, negligent things were handled? The damage here was more than foreseeable; it was inevitable. Ruffed Grouse set itself up to fail, it failed, and then it failed again when it didn’t act to stop further damage from occurring. When you place that high a premium on performance and ignore the question of what costs that performance is incurring, when you treat your students like steps on your own path to power or fame, who can be surprised at the outcome?
Statement of Teagan Eckert

“Life is a kind of Chess, in which we have often points to gain, and competitors or adversaries to contend with.” Ben Franklin said that, and I live by it. My techniques aren’t always conventional, but neither was the situation at Ruffed Grouse when I took over. Jordan Simon’s death in 2013 was the single greatest tragedy to strike the school in its 120-year history. And after the court case aired every piece of dirty laundry, the Board of Trustees knew it needed a different approach. The pendulum needed to swing hard if court of public opinion was going to give Ruffed Grouse another chance – and frankly, cutting tuition was impractical.

For me, after I left the Marine Corps, I became an educator. I got an online master’s degree in education from the University of Kansas, and I started climbing the ranks of administration. By 2013, I had grown stagnant in my role as Principal at Dianthus Hall, a co-ed college preparatory high school located just outside of Columbus, Ohio. After I set the standard on what real boarding behavior means, the program was on cruise control. And Blaine had had a bit of a disciplinary problem. Shoplifting is a nasty habit, and it didn’t reflect well on me. So when my executive recruiter told me about Ruffed Grouse, I was intrigued. It was a perfect situation to showcase my highly effective leadership. I think they were shocked when I said I would do away with all of the athletic programs and even more shocked when I said we would go full on zero tolerance when it came to discipline. But I had plotted my moves well in advance. Down deep, they wanted to be shocked. They wanted no-nonsense. I got the job.

I started at Ruffed Grouse on July 1, 2014. I laid down the hammer immediately. For those in the community expecting some kumbaya consoling tone to a community still “trying to heal,” they were not going to get it from me. I didn’t care about their feelings. After a stern introduction via email, I welcomed the entire Wisawe community to a town hall on July 15, 2014. We practically filled the auditorium with alumni and press. As I went through the plan to reinvent the school as an academics-first institution. The money earmarked for the football team would go to debate, the cash set aside for basketball would fund mock trial. The dreams of a return to preeminence filled the crowd. Of course, I also explained that in order to have success academically, order was the top priority. I knew that many thought my ideas on zero tolerance were draconian, but nobody put up too much of a fight – at least to my face.

And then there was the chess team. As you might have guessed, when I was a kid, it was my favorite game. I loved getting lost in the strategy, and I climbed the ranks quickly through hard work. I did not have that spark of a genius, though, and I maxed out at the Master level. Chess also brought me closer to my only child, Blaine. Being a single parent is never easy, and you cherish whatever connections you can make. In Ohio, though, her/his school didn’t have a team, so now that s/he was going to be attending Ruffed Grouse, I wanted to be sure s/he had the best opportunity to make it part of her/his life. S/He was behind the curve for her age, but I knew Blaine had far more potential than I ever had. There was a real spark there, not just a rote study. If I could only get her/him away from the online games! Plus, donors love photos of kids playing chess. They always look smart. I decided the chess team would be my keystone project.

For the first year of my leadership, the school really flourished. Applications were up, test scores stayed high, our college admission rate returned to 100%. The only major issue is that we were behind on donations, especially from alums who had been student-athletes. When I met Charles Babbage at a local political fundraiser, I realized I had met that golden ticket. Charles was not only the CFO of a profitable company, but he was an avid chess fan and had a previous
connection to the school through his niece. In fact, we realized that our kids attended the same
invitational chess camp a few years back. We don’t use the word prodigy too much around
Ruffed Grouse these days because of Jordan Simon, but Addison had the goods.

I convinced Charles, Marianne, and Addison to take a tour. And I laid it on thick. I even threw in
a scholarship, but that was a small price to pay for the future donations I knew would follow.
Now I wish I had not been so ambitious. Addison is a good kid, but s/he just doesn’t have the
mental makeup to be a champion. Some people just like to play the victim because it is easier
than standing up on their own two feet. At the first sign of adversity, Addison went into victim
mode, playing for sympathy or compliments from adults. I feel bad for what happened, but to
say that the school somehow exacerbated the issue or is responsible for what happened?
That’s just laughable. At the end of the day, it’s just you and the other guy across the board from
you. Some people have what it takes to match wits with the best. Some don’t.

When school started in 2015, I was really surprised that Makenzie Zuse, the faculty member in
charge of the chess team didn’t have Addison or Blaine in the starting five. Zuse thought it was
too much pressure for freshmen. I dug into her/him pretty good about that and even had words
with Blaine about not standing up for her/himself. The only good thing was that Zuse paired
Addison and Blaine as training partners, so I knew Blaine would be challenged. I also made
Zuse promise to start them for the 2016 campaign. It helped when Charles Babbage donated
the money for a state-of-the-art chess lab in the summer of 2016. He cut a check for $150,000,
half the total cost, without batting an eye.

When I was in charge of Dianthus Hall, we were able to control access to the internet, and I
never really had to worry about online bullying. We didn’t allow the students to have cell phones,
either. But at Ruffed Grouse, all of the kids had smartphones, and they lived at home, with their
own computers and tablets and what have you. Blaine would often tell me that the kids
complained about me on Facebook, Snapchat, and Instagram. I told Blaine that I didn’t care if
they hated me as long as my authority was respected. I was not there to win a beauty pageant.

By the time I actually figured out how badly I underestimated what was happening, I was down a
bishop and a rook. I was blindsided when Kara Eniac, Andrew Bacus, and Sally Gunter’s
parents all came to me in December 2016 and informed me that their kids were not coming
back to the school because of harassment they had experienced online. At first, I thought it was
an excuse for kids underperforming and in danger of losing their scholarships. But, Mr./Ms.
Zuse came to me in private later that week and explained that there was a lot of negative
chatter online and the students were venting their frustration with teachers, the administration
and fellow classmates on Facebook. Zuse seemed interested in this stuff, so I agreed to let
Zuse take some classes on the topic. I also gave more authority to a consultant, Dakota Turing,
who we had on retainer to work on student excellence. Turing was meant to be a resource for
kids who felt threatened. That’s a lot more than the other private schools were doing.

Then came the Conway incident in April, 2017. I really had no clue that she was in danger of
harming herself or others. None of the faculty did. Lynn may have been reserved, but she
excelled academically and was engaged in a lot of extracurricular activities. She wasn’t a star,
but she was doing well, objectively speaking. And objectively speaking is what matters, right?

Well, I mean, you’ve seen the note. In this day and age, you have to take those things seriously.
And it was a golden opportunity to show firm leadership, too. So I called in the full force of the
police, the FBI, everyone. We swept the entire school top to bottom, locked down the corridors,
and doubled down on sheltering in place for the entire incident. No one got in or out without ID, and we rented metal detectors and had bomb-sniffing dogs sweeping every hour or two. It would have been our finest moment. This went on for a week – no one could find Lynn. Then it turned out that she had run away to Seattle, and she told her version of things to a very friendly reporter at our local blog The Wisawe Lark. I gotta respect the gambit, even if I looked like a complete fool.

The fallout from the “overreaction” – which was actually just an appropriate response – was significant. There were Op-Eds calling for my head for “terrorizing” the students. I got a call from the Board president saying that I had 24 hours to figure it out or I would be out of a job. So I took the anti-bullying policy that Zuse and Turing had been working on and make it a zero-tolerance policy. Anyone caught violating the policy would face immediate disciplinary action and, in most instances, would be suspended. We went one step further and set up an anonymous hotline as well, so students wouldn’t have to fear being labeled a snitch if they saw something but were afraid to come forward. I upped Turing’s hours to make her/him available to any student at any time. It was expensive, but it worked. I kept my job.

But I realized there was a new board state, and I needed to master it. I needed to become more intimately familiar with social media, so I created my own online profile. I called it PartridgeParty. With that account in hand, I spent a solid month friending others that I felt were most likely students at the school, and I also got an invitation to the secretive MeanPersons club. To make my online persona real, I had to be mean myself from time to time, but most of my efforts were to promote fun school events. Once I was really in, I was shocked at how freely the students would bash each other and me, hiding behind a thin veneer of anonymity. I kept using that account for about six months, maybe a year. I would only log on from home, and I kept the password on a sticky note in my desk, with my others.

PartridgeParty gave me insight into the “Bathroom Fight Club” right before graduation in 2017. It was a simple idea. Students would meet in the bathroom at a certain time and would wrestle each other, while other students would video it with their phones. The videos were uploaded to Youtube with the hope of getting enough followers so that they could monetize the channel. I appreciated the entrepreneurial spirit, but the risk was too high. We suspended all of the kids involved, and I made a new rule that all smartphones had to be turned into homeroom teachers at the start of the day and could be collected at dismissal. I leaked the story to the local newspaper and managed to get some positive press. When asked how I knew about the club, I simply said “I had my sources.”

When class resumed in fall 2017, I kept the profile active, but I didn’t really use it much. Other problems had come up, and a lot of my attention went to helping Blaine sharpen up her/his skills at chess. This was meant to be Addison’s big year, and Blaine was slated to be 2nd chair. And when it was quiet the entire fall term, well, I let my guard down further. Addison was a golden child, and the whole school loved her/him. So, yeah, this thing with the Eye just caught me by surprise. This internet thing is fast, it is furious, and it never stops. It is on all the time, but it is impossible for us at the school to be online all the time. Plus, that’s not our job. Parents have to control what their kids do when they are home and surfing the web. And I assumed Facebook and other companies kept harassment down. I guess not.

Plus, who would think The Eye would even matter? It was just a rock a stone’s throw from the old SutureStick quarry. If you didn’t know where you were going or what you were looking for, it
was as easy to miss as a bog turtle in the middle of a giant lake. But I guess people need to get upset about something, and people sure do love that dumb thing. Charles Babbage had purchased the land and was going to clear the land to build some mega mansion. The news broke in January and by the beginning of February, kids around school were protesting to “protect” the Eye. There were T-shirts, leaflets handed out at the cafeteria, and even a protest at Wisawe town hall. I would hear some of the students giving Addison a hard time in the halls, but nothing that really gave me cause for concern.

I guess Charles Babbage wanted to do something extra special to make Addison more popular again, because he arranged for Dorsa Derakhashani, a young international grand master to teach a master class to the chess team in March 2018. Addison was captain of the chess team, and s/he was allowed to organize the event under Zuse’s guidance. But Addison kept Blaine from playing a speed match against Dorsa, and Blaine was not allowed to participate in the small group Q&A. I was incensed. Blaine was a member of the team and the number two chair. When Blaine told me that Addison was bullying her/him online about being cast aside, I punished Addison under the zero-tolerance policy. I had Zuse remove Addison as captain of the team and give it to Kathleen Antonelli, who was third chair on the team and a graduating senior. Frankly, it made sense to have a senior be a captain. Charles was upset, but I knew that when they won Regionals, his annual donation would be coming anyway. I’m not sure that Blaine ever forgave Addison. I’m not sure Charles ever forgave me. But whatever. Chess is a team sport played by individuals. Teammates don’t have to like each other. They just have to play.

I knew that Addison and Blaine could lead the team to win the mid-Atlantic regionals, with the right support. So I called Addison into my office to work with her/him one on one. S/He needed to rise above the chatter about a stupid painted rock. I mentored Addison about meeting challenges head-on and fighting through them. That’s what worked for me when I was ostracized during my years of military school, and I knew it would work for Addison. I didn’t check in online as often, because I figured the personal touch was more needed. I know that there are several posts made from the PartridgeParty account during this time, and not all of them were nice, but it is very easy for someone to hack in and take control of your ID online or spoof it. I know that Addison says s/he made an anonymous call to our tip line, but nobody mentioned one to me at the time. Of course, that thing was monitored by Turing and not me.

What I do know is that Turing really tried to help Addison, even if Addison was not mature enough to get it. Again, at Ruffed Grouse, we understood that our students were wildly privileged. They were not victims, and we hated when they pretended to be victims. When Addison came to speak to Dr. Turing, Dr. Turing did the right thing. S/He tried to instill confidence in her/him, just as I would have. Yes, Addison was in tears, but a good cry can be cathartic. So Dr. Turing offered follow-ups, even weekly counseling according to her/his notes, which was the right course of action. Dr. Turing even interviewed a few of the other students and also tried to find out more about what Addison was experiencing through Ms./Mr. Zuse. Addison never followed up. It was reasonable to think the pressure valve had released, and Addison was back on track.

We felt that even more strongly when Addison won the State championship in the first week of May, 2018. I thought the students would be excited, but according to Blaine, they still couldn’t get over the stupid Eye. We decide not to hold a pep rally for the team before Regionals because Blaine was telling me there was just too much bad blood. I also got an email from Zuse shortly before the Mid-Atlantic Regionals. I was concerned, but I also knew that Addison was
feeling normal stress. So I asked Dr. Turing. Doc thought it was probably OK, especially since Addison had not come in for counseling. And Zuse apparently did not think it was a crisis, and s/he knew Addison better than anyone.

We bused any student who wanted support the team to Baltimore that morning. But when Zuse came out... no Addison! We ended up forfeiting the chair, and the other coach was able to put his best player against Blaine, his second best against Kathleen, and so on. The whole team was thrown off, and we lost 4-1. I called Addison into my office when s/he made it back to school the following Monday. I was not mad at this point. The game was over. I just wanted to make sure Addison was ready for next year. I told her that everyone would forgive her/him once s/he was winning again, although I did suggest that it might be a good idea if her/his family found somewhere else to build their dream house. That sent Addison into tears. But s/he seemed to pull her/himself together and left my office with a new resolve.

It was too bad that that resolve was to become a criminal, destroying our state-of-the-art chess lab a few weeks later – the very lab bearing Addison’s father’s name. The damage done was over $100,000, and I couldn’t let that act go unpunished. I immediately suspended Addison and move for expulsion. I fired Zuse from the chess club as well. Zero tolerance means zero tolerance. I wasn’t going to have another Jordan Simon situation at Ruffed Grouse, even if it meant putting the chess program back a few years.

So now we’re getting sued. Because of course we are. Addison still hasn’t figured out that s/he is not the victim here.
I couldn’t wait to get out. Wisawe was great and all, but it was never home, and after everything that has happened with Addison, it never will be. For the record, I never particularly enjoyed playing chess. Sure the strategy is kind of cool, and yeah, I got some money from Pitt because of it, but it moves too slow and too many of the patterns are similar. I only really started playing because my mom/dad wanted me to, and would have done about anything to have some time together. S/He was always ok but lacked the patience to be a really good player.

Frankly? I prefer my PS4. As games grew into online platforms, so did my friend base. My real friends fight off – or cause! – an alien invasion. That was especially true because at Ruffed Grouse; my mom/dad was the principal. Nobody was going to want to hang with me. But it was fine with me. The future of games is gaming, not some dusty chess factory. Now I’ve got a ton of Twitch followers, and I can play when I want. And I won’t ever have to hear about the freaking Eye or bog turtles ever again. I mean, really, who cares that much about a four inch reptile?

I didn’t always think that. When I got to Wisawe, it was chance to reinvent myself. I came from Ohio and I went to public school my entire life. But, Wisawe is a weird place, and Ruffed Grouse is even weirder. My mom/dad had banned athletics the summer before I was meant to start my freshman year. So no soccer or tennis or anything like that. Nope, it was all about this club and that club. So, I did what I was told rather than what I thought was best and joined the chess team. My mom/dad loved it! It was like a dream come true for her/him. Chess though did give me one and only friend at Ruffed Grouse – Addison.

Addison was about as cool as a cool kid could be at Ruffed Grouse. S/He was liked by all of the students, came from a rich family, and was really the best chess player I ever met. We were paired as training partners during our freshman year, but more so Addison didn’t care that my mom/dad was the principal at all. S/He was nice to me from the first day we met. The cool thing about Addison is that her/his father was super wealthy. I loved going over to her/his house. The game room was amazing, and I was able to play all of my favorite role-playing games on a giant flat screen TV! We would go to my house as well, but no one really liked hanging out too much at my place. We lived on Ruffed Grouse’s campus, a so-called perk being principal. It was gorgeous, but it meant I could never escape the place.

That’s what I realized about Ruffed Grouse: everything was rotten underneath the surface. My mom/dad was a dictator, with all of this zero tolerance this and zero tolerance that. Students were afraid to even whisper negative comments in the halls between classes. So all that moved online. A stray comment on some post would start a thread discussion or a photo on Insta that would get everyone going off. I liked having a place to vent, so I set up RG MeanPersons Club on Facebook, only no one knew it was me because I used a fake profile – RoughRuffed – not even Addison. I encouraged all of my classmates to sign up behind an anonymous account as well, and told everyone that if they wanted to be free, they should use a fake name. What I never expected was that people would start using the page to diss on their fellow students.

It got really bad in Spring of 2016 when everyone started ganging up on a few kids that were a bit too geeky, especially Kara, Andrew, and Sally. The stuff that people were saying was crazy mean. No one likes how they look in high school, so it’s not cool to go after that, but Mean People added on the way they acted, or who their parents were. It got so bad for Kara, Andrew, and Sally decided to drop out of school completely! What really upset me was that Addison, who
went by the name, _BetterthanBest_, was just about the meanest of all the people who made fun of them. I confronted Addison about it, but s/he said they were all losers and got what was coming to them. Maybe it was all of the success s/he was having with the chess stuff, you can’t use free speech to hurt people that way.

I could’ve probably ended the entire drama myself by taking down the page, but I was afraid it would look odd if it came down all of a sudden and I was worried I would get in a ton of trouble with my mom/dad if s/he found out. It was pretty awkward and when a bunch of us on the chess team went to our coach, Ms./Mr. Zuse and fessed up about the MeanPersons Club. Ms./Mr. Zuse said s/he was going to work very hard to make sure that the page got taken down. I knew Facebook won’t do anything. So I sat there pretty much in silence as I always do. Besides, if I had taken it down, I’m sure someone else would’ve just created a similar page. People really liked the page, even – or maybe especially – in its twisted form.

So things just got worse. The MeanPersons club had more people in it than ever, and there always was always some person or group in the crosshairs. In my sophomore year, the group was the Coding Club, and the person was Lynn Conway. I really liked Lynn. She was nice and really smart, especially at computers. She was a gamer and creator, from webpages, to programs, to bugs and fixes… I even invited her to raid with me on World of Warcraft.

Unfortunately, Lynn wasn’t good with people, and she was not into “girly” things. She was always called nerd, dork and made fun of because she never dated anyone.

People would call me the “Pet” because of my mom/dad, and I just let it fade into the wallpaper. But Lynn fought back. She had written a computer virus that would destroy computers, cell phones, and tablets if the recipient opened an IM from her. It was brilliant, and it totally backfired. People lost their devices, and the harassment went from mostly harmless to downright threatening. Lynn started skipping school, avoiding eye contact… I should’ve seen these as warning signs. Then, on April 17, 2017, she posted that note, and it sent the school into a tizzy. Was she considering taking her own life? Coming after all of us? No one knew.

Funny thing is that everyone pretended like Lynn was their best friend when they thought she might be dead, they’re the ones who drove her away. While _BetterthanBest_ was not one of the meanest commenters, even Addison was part of the negativity. S/He had a talent for making cutting comments that got stuff started, like s/he liked the back-and-forth of it. Maybe it was like chess, move-countermove, but Addison really knew how to make people mad.

Well, my mom/dad went full-bore. Frankly, I think s/he liked the chance to be even _more_ in charge. The school was basically on lockdown for a week, and there were police and federal agents and all kinds of things swarming all around. Then Lynn pulled a master stroke and told her whole story to the _Wisawe Lark_. She had run away to live with a distant relative in Walla Walla, Washington under a totally different identity. She was boggled that her note had caused so much attention, and she explained in no uncertain terms that the bullying was what caused her to run away. Lynn did send me a PM and explained that she had checked herself into a mental health clinic and hadn’t been online all week. That Sunday, the front page was all about RGHS: all the bullying and class division, mom/dad bringing in everything short of the National Guard over nothing… there were four different stories, and none of them were good.

The town was outranged, and the call for change was loud. My mom/dad told me that s/he was seriously worried that her/his job was a stake, and I could see the stress on her/him. That Monday, I guess it was the 24th or so, Addison was over my house, playing chess and hoping
my mom/dad would go out so we could hop online and game for a bit. I heard the call with the
school board guy. I couldn’t believe it; rather than expressing sorrow that a great kid was driven
crazy, my mom/dad was blaming her selfishness for putting her/his job in jeopardy. That was
the first time I ever heard her/him be insensitive. Definitely a low for me. But it happened.

The thing about my mom/dad is that s/he is a fighter. There was this one time back in Ohio
where s/he was Principal at Dianthus Hall boarding school and was accused of inflating the
student standardized test scores in order to increase admissions to high ranking colleges. I
don’t know if it was true or not, but mom/dad never backed down and eventually the matter was
dropped. Realizing that the eyes of the nation might fall upon Wisawe again, s/he decided that
action for Lynn was needed. At the assembly the next day, flanked by Ms./Mr. Zuse and the
school shrink, Dr. Turing, s/he announced that the zero tolerance policy was now extended to all
online bullying and hazing. Anyone caught violating the policy would face immediate discipline,
including suspension. I knew there was no way I was going to take down the MeanPersons
page at this point. How terrible would it have been if I had gotten suspended – for not only me,
but my mom/dad as well.

Look: my mom/dad and I have had rough times. S/He’s a tyrant, and s/he will push you around
if you let her/him. And for a long time I did. But one thing I can say about her/him is that s/he
really does want the best for the students and takes her/his job super seriously. That is why I
helped her/him set up a profile online to monitor students. I swore secrecy and never told
anyone about the online ID except for Addison. The name mom/dad came up with was super
cheesy, so it was really quite fitting – PartridgeParty. I had a little giggle to myself when
PartridgeParty requested permission to join the MeanPersons group on FB. I gave her access.

For the most part her/his posts were rather harmless. All about school spirit. S/He did have an
odd habit of trying to defend her/his real-life persona, and I figured the students would realize
that s/he was not a kid, but no one paid that much attention. At some point PartridgeParty joined
in some of the mocking of the other students to make her/himself seem more trustworthy. But I
didn’t really pay all that much attention to what was going on, on the page. When s/he broke up
the Bathroom Fight Club, it finally brought some positive news to Ruffed Grouse. I mean, other
than our success at chess.

That summer I really didn’t see Addison all that much. Addison was getting a lot of pressure to
got to nationals next year for chess and spent more time than I ever cared for playing chess.
When not playing chess, s/he was hanging out with her/his sweetheart, Bobbie. And I was
happy to sharpen my sniping skills online and build my Twitch following. When we got back to
school, I was actually playing a lot better. I guess time away from the game did me well.
Addison on the other hand, was feeling the pressure of expectations and was overthinking and
making mistakes. S/He was still our number 1, but I was catching up in the 2 spot. I was cool
with whatever, but Ms./Mr. Zuse and my mom/dad were trying to pump me up and get me to
commit more time to the team. What was also kind of odd about that fall term is that the online
bullying was practically nonexistent. I checked the MeanPersons page a few times and there
was next to no chatter. PartridgeParty had not posted in months.

By the time we got back from winter break and competition season was coming, someone found
out that Addison’s father had purchased some land and was planning to build some dream
house. I didn’t really think much of it, this land had a boulder on it that someone painted a giant
eye on and it became a community icon. Or something. Wisawe was so lame. Well, somehow
this stupid rock inspired, like, a revolution. Addison became the focus of the ire. There were
protests at our townhall and T-shirts made with cheesy logos on them. Kids even started
wearing eye patches that said “I <3 the Eye” around school until my mom/dad banned them.

Good ol’ zero tolerance at work! But for Addison, the most devastating part was that s/he was
no longer cool. S/He was now the bad guy. The online folks got our their torches and pitchforks,
and the chatter started to get really mean. By March, Bobbie had dumped Addison. S/He was in
a bad place.

I guess Addison’s dad thought s/he could buy Addison’s way out of it, so he paid a fortune for
Dorsa Derakhshani to come and teach a master chess class at Ruffed Grouse. As Addison
was captain of the team, s/he arranged for all of the particulars that day. The only thing was I
didn’t want to go. It was the inaugural season of the Overwatch League, and I wanted to watch
the live stream rather than hear about the power of the en passent, no matter how cool Dorsa is.

So, I asked Addison to exclude me from the matches so I could duck out early. Addison needed
a friend, any friend, at that point and hooked me up. But I could not tell mom/dad that I didn’t
want to play, so I just said that Addison excluded me with the intention of hurting my chess
game. I didn’t think that white lie would have caused Addison to lose her/his role as captain of
the chess team or cause my mom/dad to go nuts, but that’s what happened.

Anyway, people kept wailing on Addison online, and the MeanPersons page was more active
than ever. I told Addison that if s/he was really concerned that s/he should use the school’s anti-
bullying policy and report it to the administration. Addison really didn’t want to make a big deal
about it, but promised that s/he would at least make an effort to chat to Dr. Turing about what
s/he was experiencing. In April, I followed up, and Addison said Dr. Turing suggested that they
meet regularly for counseling, but Addison thought it was a waste of time. Addison saying,
“Anytime I spend not playing chess is time wasted.” To me that was stupid. What’s the point of
having a bullying policy if you are not going to take advantage of it when you need it? I even
asked Addison if it was ok for me to speak to my mom/dad about it. I knew if mom/dad really
understood what Addison was thinking, s/he would have acted. Winning that chess
championship was everything to my mom/dad, and s/he would have done whatever it took to
support the team’s star player. I did get a visit from Dr. Turing asking me what was going on
with Addison, but I wasn’t going to play the snitch.

The odd thing was that PartidgeParty started posting again and this time it was done with
vengeance towards Addison. Attacking her/his personal life, her/his appearance, even claiming
that Addison was cheating and taking drugs. There is no way though that my mom/dad would
do that. I know s/he was mad about the entire Dorsa master class thing, but it was not in the
best interest of the school or students for Addison to not do well at chess. A lot was hinging on
Addison’s success. In fact, Mom/Dad was always asking me at dinner how Addison was
performing. I so wanted to tell her/him about the bullying and Addison’s refusal to get help from
Dr. Turing, but it wasn’t really my place. I guess I felt that Addison was old enough to take care
of her/himself. I was wrong. I definitely wasn’t the one using the account, even though I knew
the password. My best guess is that someone stole the ID. It’s not all that hard to do really,
especially since the password was “password.”

After winning States, we were in the middle of AP exams, and Addison was in a bad place. I
know s/he pleaded with her/his dad to abandon the plans for the Eye, but he refused. Addison
rebelled by bailing on the regional chess championship. That only made things worse for
Addison, as now the students were using #mightyhasfallen to diss her/him about the Eye and
how s/he was a coward. To make matters worse, my mom/dad was furious and I know s/he
ripped into Addison one day. S/He felt about it and even went online to say some nice things 
about Addison. Little good that did. It was a drop of mild positivity in a bucket of animosity.

Then someone – and I don't know who – posted this fake profile of Addison with all kinds of 
really awful stuff in it. Anyone would have snapped under that pressure. On June 14, 2018, 
Addison went full on ballistic at the chess lab, destroying all of the computer equipment and 
ended up leaving the school. Some people just tip over a king to quit, but Addison did love the 
dramatic gesture.

That really brought things to a head, and we all knew another major crackdown was coming. It 
was near the end of the school year, but there would be consequences. So most of us deleted 
our fake profiles and cleaned up social media comments and stuff. RG MeanPersons, whoever 
it was, was no exception. They nuked that account all the way down to the ones and zeros. Ain't 
no coming back from that. Probably for the best, too. Addison wasn't the nicest person, but s/he 
doesn't deserve to have that following her/him around for the next twenty years. Come to think 
of it, I'm glad my comments won't be following me, either.
Dakota Turing

7:35-3:00, five days a week, less in-service, less holidays. One hundred eighty days, unless snow hits. One thousand, three hundred, fifty hours. That’s how much time a school has to repair the damage done by the other seven thousand, four hundred and sixteen hours. We get kids for 15% of their year, and with that, we’re supposed to make up for absentee parents in half our kids and helicopter parents in the other half; fractured, vicious Mean Girls peer groups; pressure to excel from literally every avenue; and, of course, the hormonal agony that is being a teenager. When you think about it, actually think about it, it’s absurd. I’m proud to be here to set the record straight.

From the time I graduated from high school myself, I just wanted to help other people make high school less awful. I was bullied, like most of my peers. The locker room slights, the unrelenting social pecking order definition and redefinition, the occasional physical confrontation at the bus stop or the football field: you name it, I went through it. When I got to Kalmia, half of me wanted to understand my tormentors, and half just wanted to figure out how to stop it. Thankfully, I could help both of them by studying adolescent psychology and double-majoring in anthropology. And let me tell you, it opened my eyes.

In high school, I assumed that bullying was a Western problem, an artifact of consumerism or capitalism or TV or something. Turns out, nope. In 2005, a worldwide survey found bullying in all 28 different cultures examined, from the Mbuti of central Africa to the suburbs of the United States, and everywhere in between. And it’s not limited just to humans: every species of primate we have studied bullies in one form or another. Female baboons are the bullies, and it’s primarily a male behavior in chimpanzees, but the point is basically the same. Sometimes the behavior involves physical violence, and other times it’s just intimidation or bluster until the weaker member of the species submits. But bullying is natural.

In many of these studies, especially in primates, the initial trigger for the bullying was some violation of an accepted social norm, just as humans bully based on perceived social status, sexuality, or race. And across species, the victims of bullying are typically members of the social group who are still developing toward full maturity, what in humans we call adulthood. So teachers, administrators, and parents? We’re quite literally fighting human nature.

But don’t twist my words here, “natural” and “acceptable” are not synonyms. Influenza is natural, but I still get my flu shot every year. And just as the evidence shows that bullying is common across nations and species, it also shows that the damage caused by bullying is widespread. Those bullied female baboons? They experience greater stress indicators and lower rates of reproductive success. Bullied rats are less likely to drink enough water or consume enough of other resources, and mice that have suffered social defeats are more stressed, to the point that their internal brain chemistry changes.

Even if we are fighting nature, we can succeed. 3000 years ago, it was common for powerful males to have multiple wives and concubines. Today, it’s virtually unheard of. People don’t marry at 13 or 14 anymore. You can’t assault your neighbor for his land, or over who gets the best cut of meat. The process of civilization is a long war against our natural impulses, and it’s one we’re winning. But it’s a hard fight.

And it’s doubly hard when you’re not just fighting nature, you’re fighting nurture. Bullying in nature is a form of competition for resources, and we sure haven’t done away with that.
Competition can bring out the best in us, but it can also bring out the worst: racism, economic inequality, gender discrimination, violence. At their heart, these things are all about competition. And these kids at Ruffed Grouse? They’re born into competition, steeped in competition. The nicest house. The best looking car. Heck, half their parents are in finance, trying to take money from one another every day. And the other half are doctors, lawyers, professors… people who have survived the academic dogpile, excelled in high school to get to college, excelled in college to get to professional school, and so forth. This whole part of town is nothing but the hyper-competitive. You think Little League dads are bad? Try explaining to someone with a Field Medal that her son needs remedial algebra.

So that’s what I mean. We get 15% of the kid’s life to try and help them be well-adjusted, emotionally stable young adults. And then they go home and their parents and peers have four times as much time to screw them up. Big shock that the school needs full-time mental health staff, right?

I suppose I should start a little further back, just so you understand how I got to where I wound up, and how I came to be here. After I graduated from Kalmia in 1996, I did AmeriCorps, teaching in Pittsburgh public schools. I quickly came to love the city, and so I enrolled at Carnegie Mellon for my graduate studies. Once I finished my Ph.D. in clinical psychology with an emphasis on psychological administration at CMU in 2004, I began work as a counselor in Erie. After three years in Erie, I joined the Pittsburgh School District administrative staff as a coordinating psychologist, working on mental health programs and examining violence in the Pittsburgh schools. After five years there, though, it was clear that I would never have the resources to establish the kinds of comprehensive programming I wanted.

That’s how I found my way to Ruffed Grouse: resources. They paid me well, and they gave me what we needed to establish comprehensive programs for maximizing student potential. I also coordinated a program for students challenged with autism spectrum disorders, attention deficit or hyperactivity, or other problems. About three or four years in, other schools started noticing RG’s success, both academically and in terms of recruiting students. Parents with students suffering mental health issues are delighted to see them in an effective learning environment, and they are not only happy to pay full-freight tuition, but they are eager donors as well. Private schools need those kinds of parents, and so RG moved me to half-time status while I began consulting with other institutions. For most of that time, RG had a licensed social worker on staff to pick up the slack on counseling, but they came and went. Still, I’d designed a great program; all they needed to do was implement it, so there was less work for them.

It’s not like I wasn’t there. I just wasn’t there as much. I filled the gaps where I could with Skype or FaceTime, which wasn’t ideal. And honestly, I’m a better administrator than I am a counselor. I guess I’m better at studying people than healing them. Different strokes, I guess.

That said, I was sure to come back when there was an issue or during important parts of the year. For example, when Lynn Conway disappeared, I was on the next plane, even though it meant leaving a lucrative consulting gig with Oregon State University. By the time we opened school the next day, I had pulled together school psychologists from all the local schools, and Ruffed Grouse had a full team of caregivers on hand to assist with distraught students. And of course I was trying to help Principal Eckert not go any further over the edge.

To me, Lynn fit a profile of students who are at risk. Lynn was never especially well-liked, either by the students or the staff. Her parents were finishing a bitter divorce. She liked math.
was an outsider in many ways. That doesn’t excuse the harassment that she suffered, but some of that was brought on by her destruction of online profiles of other students. For many modern adolescents and teenagers, the online identity is as or even more carefully cultivated and maintained than their real modes of speech, dress, or affectation. Virtual can be more real for them than reality. Destroying an online avatar can be like murder for a teen.

Which is also what makes cyberbullying so problematic. In a world of pervasive online contact, where students judge their closest friends and romantic prospects by comments, likes, and follows on social media, performative social media displays serve as everything from hierarchy-defining status contests to courtship rituals. Students who choose to opt out of cyberspace engagement today are socially isolated like students who didn’t watch popular television or listen to popular music were two or three decades ago. As a result, disengaging from social media is not an option for students who wish social standing, and thus they are exposed to the cruelty of their peers in most of their waking hours if they wish to be a part of the community. This means cyberbullying can be even more destructive than in-person bullying.

That’s why I was so proud of the zero tolerance policies enacted after Lynn Conway re-emerged in that terrible article. Most schools just accept that they’ll never be able to police cyberbullying fully, but at RGHS, we made it clear that any harassment would be addressed with serious sanctions. Principal Eckert called it “zero-tolerance,” which I’m not sure was completely accurate, because there were several students who received formal reprimands or detentions, rather than suspensions or expulsions after online incidents of harassment. But that’s not that surprising; Ruffed Grouse is a tuition-based school, besides which, ruining kids’ future after a single sexist or racist or harassing incident could actually be counter-productive. It’s just not reasonable to expect that level of self-control or self-awareness in teenagers whose brains and impulse control had not fully developed. I fully supported educating these students, and all of them had to write 500- or 1000-word essays on what they had learned from the incident.

But that was not all we did, of course. We established a rotation where there was always a professional on campus who could assist with mental health issues or bullying. And we sent emails weekly containing resources for stress relief, self-esteem building, and therapeutic exercises for students feeling unwell, whether because of bullying or for any other reason. I wrote those myself, and they included different things each week, but all of them known to reduce stress or other challenges. We called it Ruffed Grouse: My House, because we wanted the students to feel ownership of it and of the school environment.

It was about a year later, in April 2018, that I met Addison Babbage for counseling the first time. Addison was a junior and was, so far as I could tell, a very popular individual, the opposite of Lynn Conway. S/He was also the captain of our renowned chess team, a savant of some kind, I’m led by Ms./Mr. Zuse to believe. Addison’s family had gotten embroiled in some kind of real estate fiasco I didn’t really understand, and Addison stopped me in the hallway to ask about seeing me. I told her/him, of course, we could meet the very next day. Addison was very worked up during the meeting, very dramatic, with sweeping hand gestures and out-of-place emotionality. S/He even shed a tear or two. But therapy is hard, and that’s expected. About twenty minutes into our conversation, I finally got to speak, and I began by saying that I was a little surprised to see her/him, because s/he seemed so strong and came from what seemed to be a strong family background. I told her/him that s/he had the reserves of strength to overcome this challenge, if s/he put her mind to pushing through it. I guess Addison took this as a sign that I didn’t care, because s/he started shouting at me, saying I was ignoring the issue, and
demanding that I file all kinds of paperwork, including a criminal complaint! Addison is young, so
s/he does not appreciate the kind of blowback that can come from taking things to law
enforcement, especially if one of the other students or parents got arrested.

I advised that s/he come see me again the following week, and we could discuss it, and I told
her/him that if s/he still wanted to make a formal complaint in a couple weeks, we would figure
out how to do that. I even offered regular counseling sessions with Addison. I guess Addison is
more used to getting her/his way than that, because s/he screamed at me that I didn’t
understand or care, which was totally untrue, and stormed out. I made an appointment on our
Performance and Mental Health Counseling intranet, so Addison should have been invited to
see me automatically. But s/he never came by. I knew about an anonymous hotline call in
March, but there had not been once since. And s/he never left a voice mail or email with the
Ruffed Grouse hotline or with me personally after our session, either. If s/he had, I would have
either referred her/him to the social worker for counseling or recommended someone locally. I
also did some investigating. I spoke to Blaine Eckert, trying to get some insight there, but Blaine
was really of little help. Maybe it was the Eye thing. Still, I definitely made the effort.

I also of course let Principal Eckert know that I was counseling Addison. Knowing how s/he is,
though, I told her/him it was for performance counseling. I emailed Mr./Ms. Zuse, too, because
as coach, s/he would need to keep her/his eyes open. S/He was also a good point of contact for
computer harassment type stuff. And I sent an email to the general help box at Facebook, but
they never responded. None of them did, really. But I know how busy everyone is, especially
around exam time, and when Addison no-showed her/his appointment, there was little we could
do. For all I knew, I had been right, the seeming moment of crisis had blown over, and Addison
was back on top of the social hierarchy. Things change very quickly with teens and I am no
stranger to drama that spikes and then fades away.

Weeks later, we got a request to make a formal cyberbullying complaint. But we had not seen
any serious mental issues from Addison, and s/he was not coming in for counseling. S/He just
had to say the word, and we would have tried to help her/him stay mentally straight. But that
word never came, and if Ms./Mr. Zuse was not convinced something was wrong, I had no
reason to disagree. AP exam season and a major tournament in a mental sport? I would have
been more worried if Addison was not showing some signs of stress. I suppose I could have
forced Addison into a clinical interview, but starting a counseling relationship with compulsion
rarely leads to progress. We avoid it unless it’s absolutely necessary.

Shortly after the incident with the chess room, I was called to Principal Eckert’s office, and my
services were terminated. I wasn’t surprised; in Principal Eckert’s eyes, there needed to be a
scapegoat, and I was handy. It was my anti-bullying program, after all. Even so, I thought it
was fairly ridiculous to suggest that the firing was because I had failed to note Addison’s likely
behavior. I’m a school psychologist, not a mind-reader! And I’m not a computer hacker, violating
Facebook’s terms of service with fake names or whatever to spy on kids. We provide a
resource; we don’t press ourselves on our students.

Even if we failed Addison, which I don’t think we did, we likely prevented many cyberbullying
issues, and we provided first-rate mental health and performance enhancement for hundreds of
students each year. That’s a lot of which to be proud! Frankly, it was also kind of a relief to
sever ties with Principal Eckert, too. I now get to work with juvenile detention centers across
Western Pennsylvania, and honestly? I feel like I’m smiling on the way to work for the first time in years.’

There is one other thing I feel like needs to be said. A lot of parents have blamed the “competitive culture” at Ruffed Grouse for the Conway and Babbage incidents. But it’s amazing how the same parents don’t seem to blame the competitive culture when it comes to college admissions or in their own homes. Parents are the driving force! When parents teach their kids that winning matters, that’s… well, there are arguments in the school psych community, but I think it’s reasonably fine. It’s not all participation trophies in the real world! Similarly, when parents teach their kids that they are special, I think that can be very healthy for self-esteem and familial development.

The problem is when the two are put together, and when parents teach their kids that because they’re special, they’ll win. The logical extension – in which our parents are all too happy to indulge – is that if the students don’t win, or excel, or meet their expectations, no matter how unrealistic, it’s because the teacher or coach is biased against them, the other team is cheating, the ref called the game wrong, or some other factor. The truth is simple: competition means losing. Sometimes, it means losing a lot, and sometimes those losses have real costs in terms of prize money, college scholarships, or whatever else. But it’s only by overcoming these losses that you can grow. Being told you’re special and deserve to win and got cheated is exactly the wrong lesson. It breeds entitlement, and it retards personal growth. If it happens often enough, it can actually stop that growth entirely.

So you want to know what happened to Addison Babbage? Well, yes, you can start with chess, and cyberbullying was probably a factor at some level. But you have got to look at the parents, too. The parents, though, put on pressure 24/7, including their expectations while the students are at school. Too much pressure can actually stunt development and hurt overall performance. Addison’s parents were “winners,” as society defines that term, and it’s no surprise that they would pass on a desire for Addison to succeed as well. But when I asked Addison where s/he felt the pressure in her/his life was coming from, the first thing s/he said was her/his parents’ expectations. They wanted Ivy League, no excuses, and preferably a top Ivy like they had gone to. And I got the sense from Addison that they were not around. The same wins in business meant that Charles Babbage was working 80 hour weeks and Marianne was on the road promoting her bestsellers or popping onto CNN. But the levels of pressure put on Addison were too much for her/him, and s/he needed the support of her/his parents. They weren’t there; they were off, succeeding in their own right, yes, but checking in on tournament results and watching a few games now and again with an “attaboy” isn’t parenting.

With the lion’s share of the time and opportunity must go the lion’s share of the responsibility. Ruffed Grouse saw Addison 15% of the year. The Babbages had her/him the other 85% of the time. Ruffed Grouse does not have access to Addison’s social media. Her/his parents bought her/him the computer. So tell me: whose fault is this again?
<table>
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<tr>
<th>Exhibit 1</th>
<th>Ruffed Grouse High School Cyberbullying Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exhibit 2</td>
<td>Email from Lynn Conway to RGHS ListServe</td>
</tr>
<tr>
<td>Exhibit 3</td>
<td>Op-Ed from <em>Wisawe Lark</em></td>
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<td>Exhibit 4</td>
<td>Article from Lancaster Online</td>
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<td>Exhibit 5</td>
<td>Op-Ed from <em>Wisawe Lark</em></td>
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<td>Exhibit 6</td>
<td>Photo of The Eye</td>
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<td>Exhibit 11</td>
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<td>Formal Complaint by Makenzie Zuse (via email) and response from Teagan Eckert, and Dakota Turing</td>
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</tbody>
</table>
The Board of Trustees and Administration of Ruffed Grouse High School finds bullying, including and especially online or cyberbullying, morally reprehensible. Online harassment is counter the very principles of brotherly love and sisterly affection that is the foundation of our academic institution. We strongly believe in the freedom of speech, freedom of association, and freedom of belief. Online forums and social medium platforms certainly can and should be used as tools to advance these core beliefs. However, when such tools are used with the intention to harm, to harass, to embarrass, and/or to isolate members of the student body, Ruffed Grouse cannot stand idly by. We are a community striving for academic excellence and social responsibility. When one of our members of the Ruffed Grouse family suffers, we all suffer.

Therefore, Ruffed Grouse reaffirms that all students, faculty, administrators, staff, parents, guardians and all other interested parties are forbidden from intentionally engaging in negative online posts regarding current and former students of Ruffed Grouse aimed at harming, harassing, embarrassing, and/or isolating said students.

Harassment includes any written, verbal or physical conduct that adversely affects the ability of one or more students to participate in or benefit from the school’s educational programs or activities because the conduct is so severe, persistent or pervasive.

There is zero tolerance for any student(s), faculty, administrators, and/or staff engaging in such behavior. Punishment can range from suspension to expulsion for students and from formal reprimand to termination for faculty, administrator, and staff. Parents and guardians found to have engaged in online bullying can also face discipline ranging from monetary fines to corresponding student expulsion.
To proactively advance this policy, Ruffed Grouse will:

- **Create a 24/7 Anti-Bullying Hotline** that can be used to report online abuse anonymously.
- **Continue to Provide Access to Dedicated School Psychologists** who are trained in issues pertaining to online bullying.
- **Provide Regular Opportunities to Students, Parents, and Guardians** to meet with Ruffed Grouse’s administration regarding this policy or individual issues.
- **Provide an Anti-Bullying Toolkit** of resources that can be used by students, faculty, administrators, staff, parents and guardians to educate themselves regarding the issues caused by online harassment as well as coping skills for those that are bullied.
- **Establish a Formal Anti-Bullying and Harassment Program** and Name Up to Three Anti-Bullying and Harassment Monitors among the faculty and staff.

Ruffed Grouse pledges to take full responsibility for the well-being of students who are victims of online bullying. Students being bullied online must follow this protocol:

- Report online bullying timely. We can only help if you let us know.
- Provide evidence that you are the victim of online bullying by an individual or group of individuals. This process may entail providing screen shots or directing school officials to offending posts.
- Follow the guidance of designated school psychologists and/or Anti-Bullying and Harassment Monitors. We will help you get the help you need.
- Do not engage in “counter-bullying”. Two wrongs definitely do not make a right. In fact, online, counter-bullying can lead to a “flame war” in which bullying or harassment escalates.
- Cooperate in any investigation conducted by the Ruffed Grouse administration.

Importantly, please note that submitting a false claim of online bullying is a serious offense and is also subject to the school zero-tolerance policy.

In light of the recent loss our community suffered as the result of online bullying, this policy and pledge is effective immediately. Any questions regarding this policy, or online bullying in general can be submitted through the Ruffed Grouse Principal’s office or to one or the Anti-Bullying and Harassment Monitors.
To those who may now have a concern:

Ruffed Grouse ... I will not miss you. The laughs, the stares, the constant whispers in my ear that could not be heard but only read never left my mind. You were with me always, poisoning cyberspace with your vile slander and your whispered lies. When I woke, when I slept, it was there. You were there. But when I cried out loud, nobody bothered to hear. Not my so-called friends, who could have helped me; not my enemies, who would have rejoiced; not even my teachers, who should have saved me. Maybe now that it is too late to matter, somebody will listen.

I have thought about ways to make you all pay for your silence, to pay for your uncaring ways. But I know you won't change, not without you walking a darker path. So that is the path I will walk, and I will make you walk it, too. Perhaps when you're holding your own broken children in your arms, you will understand. Perhaps only when Ruffed Grouse is no more will the pain end.

I never told my parents. I love you, I'm sorry. I thought I was stronger.

Lynn Conway
Readers, I call them like I see them and that’s why you love the Lark. And, I am saying it right now, Ruffed Grouse might have gotten rid of the athletic programs that ruined reputation, they might have a new hard-nosed principal, and they might have a highly ranked chess team but, it is really just the same old Ruffed Grouse: an embarrassment to Wisawe, a joke of an institution charging tens of thousands of dollars a year to fail its students.

We all know about the tremendous person-hunt that spread across our community like a wildfire looking for Lynn Conway. Principal Eckert took a plea for help from someone who was being bullied mercilessly online as the ramblings of a mad-woman bent on revenge. The seven day manhunt captured the attention of the national media, sucked up the resources of the FBI, and our local and state police, and turned out to be nothing more that Lynn looking to get away from the students that caused her so much pain and an administration that failed in their duty to protect the innocent.

I caught up with Lynn on Skype earlier today and she couldn’t believe what happened in the time it took her to get the emergency mental health care she needed and get out of Wisawe. She summed it up in a few choice words – “they are all idiots”! Lynn is happily living with her Aunt outside Seattle now, but don’t looking: she has gone underground to escape the monsters at Ruffed Grouse. Dear readers, if you saw the things that these teens say online in barely-disguised identities you would have no question why she had to leave before something really awful really did happen. There is a lot more healing that will occur, but after a well-deserved mental break, I am happy that Lynn is on the mend.

The same cannot be said for Ruffed Grouse! It will take years to undo this latest self-inflicted wound. Cyberbullying has finally reached our collective consciousness, but Principal Eckert missed the memo. Someone this out of touch should be immediately dismissed. The school needs someone who gets today’s students and the pain that they face from the schoolyard hellscape that the internet has become. Wisawe has lost the luminescent spirit that was Lynn Conway. Ruffed Grouse cannot stand by and wait for the next victim.
Ruffed Grouse is one again in trouble. The much ballyhooed private high school that once bragged of its miles long trophy cases has fallen on tough times. And now, the downfall of another Principal is within sight.

From the disgrace of Leona Hamline (steroids), to the tragic demise of Jordan Simon (overdose), the very foundation of the institution – athletics – was stripped with the installation of Principal Teagan Eckert in 2015. Principal Eckert carries a reputation as a hard-nosed no-nonsense disciplinarian with no time for distractions from the educational mission of the high school. "Zero-Tolerance." Or so that is what s/he wanted you to believe.

But now the Intelligencer has learned that former Ruffed Grouse student Lynn Conway’s "manhunt" and dramatic escape to the Pacific falls at the feet of her Ruffed Grouse classmates, who tormented her unchecked for years online. And the community is calling for Principal Eckert’s immediate resignation. Parents are looking for answers as to why cyberbullying is happening under a zero-tolerance mandate and extremely high tuition. "It’s been an issue for years. No one cares." Those are the harsh words of Jenny Eniac, who had to pull her daughter out of Ruffed Grouse because of online harassment. "I can’t believe they let it get this far."

Today, Ruffed Grouse announced what it is calling one of the United States’ strongest anti-bullying promises and pledges. "It is our duty to protect our students, both in our classrooms, at home, and online. We promise to do more, this problem will no longer be ignored!,” said Principal Eckert. With cyberbullying on the rise, we only hope that this time Ruffed Grouse is right!
Readers, the sign of maturation is admitting when you are wrong. On April 24, 2017, I wrote a scathing blog that called for the principal of Ruffed Grouse to be fired for the ridiculous escapade that was Lynn Conway’s cry for help. While I still firmly believe that the school made a number of mistakes (the most serious of which was placing the entire town on lockdown for 7 days while Lynn Conway was missing), the true test of character is not the incident itself, but the reaction. I am happy to report that Ruffed Grouse’s character is stronger than ever.

Over the past couple of months, Ruffed Grouse reacted with great merit under the guidance of Principal Eckert. The day after my blog, Eckert extended her/his zero-tolerance policy to cyberbullying. Ruffed Grouse went one step further and pledged to keep all of its students safe from online harassment. To the best of my research, this is one of the most far reaching cyberbullying policies in the region. Of course, I was skeptical if it would work. Of course, I thought this was a hail Mary effort by Eckert to save her/his job. Of course, I was wrong!

The fact is that the policy is working. Through anonymous sources, I learned that the new online protocols allowed Eckert to sniff out a student club—a fight club, if you will allow—that was not only organizing and videoing arranged scuffles between students for subscriber and likes on Youtube, but calling out the losers in the most heinous of rhetoric online. The fights were taking place in between classes and the students would use the school bell to signify the start and end of each round. Principal Eckert was quick to react. Swiftly catching the students in the act, punishment was dolled out equally as fast resulting in 5 suspensions.

I managed to catch up with Eckert this morning and when asked how s/he knew what was going on all s/he said was, “we have our methods and our methods are working.” Maybe it was the cyberbullying hotline, maybe it was a mole, but whatever it was, it worked. Maybe Ruffed Grouse has finally turned a corner and will once again be the leader it always was.
Exhibit 7

Save the

because who else will watch over you?

I ❤️
Exhibit 8

Ruffed Grouse Cyberbullying Hotline Transcript
Date: 03/21/2018
Time: 23:12

RECORDING: Thank you for calling the Ruffed Grouse Cyberbullying Hotline. This is a recorded service. If you are experiencing an emergency, please hang up and immediately dial 911. What is your name?

CALLER: I would prefer to remain unknown.

RECORDING: What is your telephone number?

CALLER: I would prefer to remain unknown.

RECORDING: What is your email address?

CALLER: I would prefer to remain unknown.

RECORDING: Please explain the reason why you called the Ruffed Grouse Cyberbullying Hotline.

CALLER: For the past couple of months I have been constantly harassed online. It is because of my father buying this big property that everyone is ganging up on me. Something about this stupid rock called the eye. I do not want to be labeled a snitch, but the harassment has got to stop. I cannot sleep and cannot focus on school. This is not my fault and I am being blamed. I beg you to take down the Facebook page called MeanPersons Club. This is where all of the bad stuff is said. I wish I could say more, but I am worried it will get back to me and make the problem worse.

RECORDING: Thank you for calling the Ruffed Grouse Cyberbullying Hotline. We take all recordings seriously and your statement will be reviewed by a trained professional. Remember that if this is a true emergency, please hang up and call 911. If you are currently feeling threatened or are considering self-harm, please hang up and call 911. Thank you. Have a nice day!
'RAGE' Your freaking child WAS invited. COULDVE (*&*%& COME and BEEN PART OF THIS. DIDN'T WANT TO BE INVOLVED!! AND YOU. Letting me take the fall. How dare you. I hate this place. I am the captain and how I am not because you LIED OR MORE SO were afraid to tell the truth.

Addison Babbage
March 24, 2018

Thanks dad!! Dorsa Derakhshani - Chess Master - AT MY FREAKING SCHOOL!!! We are going to kill it this season.

Addison Babbage
March 13, 2018

My favorite place is becoming my own living nightmare. I loved this place and they ruined it. I have come to hate everything and everyone.

Addison Babbage
March 12, 2018

"tears" you just try and improve yourself and you get nothing in return. People fear you down because they just dont understand.

Addison Babbage
March 6, 2018

Sometimes people just dont know what you are going through. Sometimes people are just jerks. Go ahead. Say what you are going to say. You know what you are. You suck. I am better than you. I will rise above this.

Addison Babbage
February 26, 2018

Nobody knows the pain another is going through. Sometimes you have to be stronger than people know. Sometimes you have to keep your head down and just hope that tomorrow will get better.
“squeak” Pops, got the land. Time to build our dream house. This is becoming my favorite place on earth.

Addison Babbage
February 13, 2018

New season. Same results. I AM THE BEST!!! Suck it cheetahs. A new GRAND MASTER in the making!

Addison Babbage
February 13, 2018


Addison Babbage
December 8, 2017

Be careful on social media. You never know who you are talking to on social media.

Addison Babbage
May 28, 2017

0 tolerance. 0 freaking tolerance. It is sad. But really??? People in pain do not need to be locked down like this. It will drive people away.

Addison Babbage
April 25, 2017

Wow. Tragedy happens. SMH. This place is out of freaking control. Seriously!!!! SMH happens. How can this place be really out of control. Locker searches. Seriously????

Addison Babbage
April 21, 2017

😭😭😭😭 you never know when people are hurting. Lynn, it can’t be true. It just can’t be. 😭😭😭😭
What can I say, I am a chess champion!

I love Ruffed Grouse High! It is the best place to be a student, a chess champion, and an all around rock star like me.

Really, is that the best you fools have - "the Per"! Mess with Blaine and you mess with me. RG Mean Persons Club, lame, can't even punctuate right.

So people make fun of you and you tuck and run ... really ... this is a great school! Why on earth would you transfer because people made bad comments about your $MH

WAHOO!!! I made the chess team - Zuse is the BEST COACH ANYWHERE.

Going to Ruffed Grouse High! Thank God my parents are the BEST!
Exhibit 10

Facebook Page of Addison Babbage

DO YOU KNOW ADDISON?
To see what they share with friends, send them a friend request.

Intro
Crazy chess “champion.” I think I am cool, but fact, I am not. I am LAME!!

Photos

Friends

PartridgeParty
May 19, 2018
Maybe we are being too hard on Addison? I mean, it would be cool if we won nationals next year! I think we tone it down. Tolerate doesn’t mean like, right?

Like
Comment
Share

Write a comment...

Addison Babbage
May 19, 2018
My name is Addison Babbage…..but you can call me Whiny Loser!

Like
Comment
Share

Write a comment...

PartridgeParty
May 17, 2018
Only the fool keeps coming back for more pain. And the pain will never stop until you leave Wisaw and leave the Eye alone. Go away and fast. No one likes you!

Like
Comment
Share

Write a comment...

Addison Babbage
May 14, 2018
"I am a chess champion" = Grade a looooser.

Like
Comment
Share

Write a comment...
Addison Babbage
May 10, 2018
I am a terrible person. I think I am better than everyone, but in the end I am just an underachieving rich kid!

Addison Babbage
May 7, 2018
So this is how it is. Look at me. I am so awesome. So what that nobody likes me, that I am clearly only here because of my father, and I am not smart enough to be in this school. Oh, and I cheat at chess.

Addison Babbage
May 6, 2018
Oh ya… my dad is wealthy and I am going to make sure you ALL know it. Destroying landmarks is my rich hobby!

PartridgeParty
May 4, 2018
You’re literally the biggest loser EVER! You have no friends. Just even the pawns like you. Might as well knock over your kings before someone knocks you out!

Addison Babbage
April 23, 2018
My family is going to destroy everything you love. That is what we do. We are the kind of people you cannot trust. I am a user… and I am the boss!

Addison Babbage
April 20, 2018
Looooook at me……I am a "chess champion." How awesome am I. Not!
Re: Addison B.

Teagan Eckert
To: Makenzie Zuse

Dear Makenzie:

Thank you for your note and your concern. Rest assured, I take this as a very serious matter and it will be dealt with appropriately. I personally know about this situation and I will take appropriate action. The cyberbullying policy is in place for a reason. I should know, I created it!

Leave this one with me. Get back to chess. We have states coming up, and our fourth and fifth seats are lagging. I do not want any distractions.

TE

Makenzie Zuse
To: Teagan Eckert

Dear Principal Eckert:

I am very worried about Addison. S/H seems anxious to me. I have collected a lot of evidence that s/he is under heavy attack online because of the whole Eye thing. In addition, and I hate saying this, but I think someone you are very close to is partially responsible. Can we have a meeting so I can present my findings? I do not want this to go on any longer.

Makenzie
Hey Blaine, need your help.

The situation with the Eye and everything has got me way down :( thinking of going and seeing Dr. T. I don’t know what else to do.

Yo Al Long time. Yeah, I see all that stuff. Crazy! Go tommorrow. That is what the policy is all about.

O.K.

So, I went. Waste of time. Dr. T is as bad as your mom/dad. Got a lecture instead of help. Not going back to get yelled at every week!

That sucks! Are you sure? I think you really need some help.

Sure! Thx
PROGRESS NOTE
RGHS Performance and Mental Health

CONFIDENTIAL

Student Name: Babbage, Addison  Date of Birth: March 31, 2000
Provider Name: Turing, D., Ph.D.  Date of Service: April 12, 2018
Reason for Visit:

___ Performance (Acute)  ___ Performance (Regular)
___ Mental Health (Acute)  ___ Mental Health (Chronic)
☒ Urgent Issue (Acute)

Referred by:

___ Faculty (___________)  ___ Administration (___________)
___ Parent  ☒ Self
___ Other (___________)

Others in Attendance: Y/N  Student Receiving Outside Care: Y/N
Student on Medication: Y/N

Student Reports:

___ Suicidal Ideation  ___ Academic Issues
☒ Extracurricular Issues  ___ Hallucinations
___ Alcohol Use  ___ Drug Use
___ Paranoia  ☒ Physical Symptoms
☒ Stress  ___ Insomnia
___ Pain  ___ Difficulty Concentrating
___ Panic Symptoms  ___ Difficulty Communicating

Depression Scale: 1 2 3 4 5 6 7 8 9 10
Anxiety Scale: 1 2 3 4 5 6 7 8 9 10

Family Situation

☒ Stable  ___ Unstable

Social (School, Relationships) Situation

☒ Stable  ___ Unstable

Symptoms Over Time:

___ Improving  ___ Worsening
☒ About the Same

Clinical Evaluation: (Check if Abnormal)

___ Mood  ___ Affect  ___ Thought Content
__ Dress __ Cognition __ Thought Process
__ Motor Skills __ Alertness __ Attention Span

Clinical Encounter Notes:

Addison came to see me today after making an appointment yesterday. S/He considerably stressed by pressures both at home and at school, in the chess club. There is also some kind of issue stemming from social media and a recent breakup after several years of casual dating, rendered by Addison as a “love of my life” situation. Her/His social standing has suffered, and s/he is having difficulty adjusting. Addison was emotional but lucid during the first fifteen minutes of the encounter but became enraged when I suggested that s/he had reserves of strength to call upon. S/He demanded that I file a criminal complaint. When I advised against such drastic action, particularly in light of the unclear basis for taking it, Addison threw a tantrum and stormed out. Fortunately, I was able to obtain a commitment to future counseling. Perhaps someone closer to her/his own age and further from that of her/his father would find it easier speaking with her/him and/or could avoid the intense emotional outbursts, totally out of scale to the actual stimuli. One would almost suspect a histrionic personality disorder from the level of emotion. Perhaps s/he is just having a bad few weeks, not atypical for a Junior in high school. It seems likely this will simply pass naturally, even without intervention by P&MH or other staff or administration.

Plan of Action:

Addison has been scheduled for follow-up with social worker Sandy Bletcherly for next week. I hope s/he attends, but once AP exams and the chess regionals pass in May, a full recovery can be expected regardless.

E-SIGNATURE:

_D. Turing, Ph.D._

Identification Verified by SigScan!

Printed by M. Rejewski, 11/1/2019, 3:32 pm
### Exhibit 14

<table>
<thead>
<tr>
<th>Dakota Turing, Ph.D.</th>
<th>May 15, 2018</th>
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</thead>
<tbody>
<tr>
<td>To: Teagan Eckert</td>
<td>22:50:55</td>
</tr>
<tr>
<td>Cc: Makenzie Zuse</td>
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</tbody>
</table>

All:

Sorry for the delay. Was in Sacramento for the University of California system meetings. Predictions are hard, and assessing emotional state is really tricky. People can succeed while falling apart, and they can fail while totally fine. What I can say is that Addison came in for counseling and then stormed out. We have offered follow-up counseling, but s/he did not show for it. I’ll renew that offer through the automated system, but I’m not optimistic. It will likely be fine, but stress is natural for a junior staring down a major competition with college implications, and summer is nearly here. Mr./Ms. Zuse, if you think this is a mental health crisis requiring immediate response, please send Addison here during homeroom, and we will assign someone to see her/him. Or forward our brochure on outside crisis counseling.

Dr. Dakota Turing, Ph.D.

<table>
<thead>
<tr>
<th>Teagan Eckert</th>
<th>May 12, 2018</th>
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</thead>
<tbody>
<tr>
<td>To: Makenzie Zuse</td>
<td>07:16:23</td>
</tr>
<tr>
<td>Cc: Dakota Turing, Ph.D.</td>
<td></td>
</tr>
</tbody>
</table>

Are you sure that’s how Addison wants to handle this? Getting other kids suspended has never been a quick bath to ending bullying. Plus, Addison has look great, like a STATE CHAMPION! Whaddya think, Doc?

<table>
<thead>
<tr>
<th>Makenzie Zuse</th>
<th>May 11, 2018</th>
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<tbody>
<tr>
<td>To: Teagan Eckert</td>
<td>08:15:12</td>
</tr>
<tr>
<td>Cc: Dakota Turing, Ph.D.</td>
<td></td>
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</tbody>
</table>

Dear Dr. Turing and Principal Eckert:

I am advising you of a formal complaint by one of our students, junior Addison Babbage, under the cyberbullying policy. Although there are various very problematic posts, the locus of the cyberbullying is a Facebook page called RGMeanPersons (as in Roughed Grouse MeanPersons). I have obtained access to the group – regrettably, by making mean comments – and I can tell you that this looks to me like classic cyberbullying. It seems like it is having a real impact on Addison. You should look at the comments and posts under #mightyhasfallen, especially the stuff by the user PartridgeParty. Ugly stuff.

Principal Eckert, please engage our Zero Tolerance Incident Response Protocol. Dr. Turing, please try and help Addison with the fallout.

MZ