

Handout 8
Deposition of Olivia Marquez

Q. Ms. Marquez, are you the supervisor for the Computer Science Club at Ann Arbor Public High School?

A. We call it the “coach,” but yes.

Q. How long have you been the coach of the Computer Science Club?

A. Just about two years now, or almost two years, I guess.

Q. How did you come to be the coach?

A. Well, my daughter is a student at the school, and she is in the club. She told me that the previous coach had to step down because he became ill. They needed a new coach, so I volunteered to step in.

Q. What led you to volunteer?

A. Well, it was important to my daughter. But also, I really enjoy working with kids, and I think it is important to encourage kids to consider computer science, and other STEM fields, as a career.

Q. Sorry, other what fields?

A. Oh, right, STEM. It’s an acronym that stands for Science, Technology, Engineering, and Mathematics.

Q. Do you also encourage students to work for government agencies like the NSA?

A. Well, I certainly discuss it with them. I think that working for the government gets a bad reputation. Teenagers especially see it as bureaucratic and boring. I want to make sure they know how important the work we do is, and how interesting it can be. I want them to view a government job as a terrific use of their talents. The government needs talented scientists and engineers. And high school is a perfect time to get kids thinking about these things, while they are thinking about where they want to go to college.

Q. So do you talk about those things as coach of the club?

A. Yes, absolutely. I expose them to opportunities for careers in the STEM fields, and tell them how to train for those jobs, and encourage them to have the confidence to take the necessary classes.

Q. Ms. Marquez, how do you know the Plaintiff, Kenji Davis?

A. Kenji was a member of the Computer Science Club. I met him about a year before I became the coach, because I was a guest speaker at one of the club meetings and he came up to chat with me afterwards. I was impressed with his passion for computer science and math, and his ability to engage with me in a very mature and articulate way.

Q. But he isn’t currently a member of the club, correct?

A. No, he dropped out about a month after I took over as coach.

Q. What were your impressions of Mr. Davis?

A. I thought he was bright, motivated, disciplined, mature, and not afraid to tackle a challenge.

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Q. Was he well-liked by the other club members?

A. Oh yeah. I get the sense that the computer science club is like a second family for these kids, especially because if they aren't into sports, or the arts, or things like that. And from what I saw, Kenji got along well with the other kids and was part of that family, at least until he quit.

Q. Did you discuss his decision to quit with him?

A. Yes, I tried, but he wasn't really responsive. He developed this conspiracy-theory mindset about how the government is spying on everyone all the time. I think he spent a lot of time reading some fringe websites and believing everything he read. I tried to talk to him about his views, and how the NSA does a lot of things other than some of the controversial programs he sees in the news. I told him about all of the other math and science opportunities there are, both in the government and out of it. But he still quit the club.

Q. Did that bother you?

A. Well, a bit, I guess. I hated to think that he was giving up participating in this club that had been so important to him just because I was the coach and I work for the NSA. But I wasn't going to stop volunteering, because I knew the club really needed me.

Q. Ms. Marquez, let's turn now to February 20, 2014, the day of the assembly. Why were you asked to speak at the assembly?

A. The Principal asked me to speak as a computer scientist and government employee, to inform the students about careers in the STEM fields and in the government, and also to talk about what the computer science club does and how to get involved.

Q. Did you see Mr. Davis at the assembly?

A. Yeah, he was hard to miss. He was on stage and in the front row. Not to mention the patch on his shirt that read "The NSA Sucks" in big bold letters. You couldn't really miss it.

Q. Did Mr. Davis interrupt your speech?

A. Well, not orally. There were students murmuring before the assembly began, but I gave my speech as planned. I don't hold anything against Kenji, but he definitely disparaged the computer science club and my employer in front of the entire student body, which is disappointing.

Q. Were any of the club activities affected, either that day or in the days following the assembly?

A. The other students in club were noticeably upset. You know, these kids, they devote a lot of time and passion to computer science club and believe in it and they are sort of protective of me, I think. That day some of the other club members were calling him a traitor.

Q. Did anyone mention confronting Mr. Davis?

A. Not that I can remember. They were clearly upset but no one said anything to me about approaching him, or getting revenge or anything like that, if that's what you're asking.

Q. Since the incident, have you observed any interaction between Mr. Davis and the current members of computer science club?

A. Well, I think he was suspended for the rest of the week of the incident. Since then, I've seen some students give him the cold shoulder, but I have not seen any actual interaction between Kenji and the rest of my kids in the club.