

38TH ANNUAL CASE  
THE OFFICIAL  
**COLORADO  
CASE PROBLEM**

*People of the State of Colorado  
vs. Blake Katsopolis*

Written by Colorado Bar Association  
High School Mock Trial Committee



## **Case Summary**

The 9<sup>th</sup> Judicial District (Pitkin County, i.e., Aspen) is prosecuting a college admissions scandal case that the Department of Justice turned down. The Defendant, Blake Katsopolis, is a wealthy parent who utilized Kyler Gibbler's college admission counseling service to help get their child, Cameron Katsopolis, into the College of Colorado. The parent went to the College of Colorado and desperately wanted their child to go there. College of Colorado, which calls itself the Yale of the Rockies, is extremely selective, with less than a 14% admission rate. Blake Katsopolis claims to only have known of and used Gibbler's legitimate services, but Gibbler, who helped the FBI trap and prosecute dozens of wealthy parents from across the country in return for a reduced sentence, claims the Defendant was fully aware of the scam. Although Kyler Gibbler may have used some improper methods, it was determined that Cameron Katsopolis would have been accepted to College of Colorado on their own merit.

## AVAILABLE WITNESSES

### Prosecution

1. Kyler Gibbler
2. Riley Tanner – Expert
3. Drew Donaldson

### Defense

1. Blake Katsopolis
2. Cameron Katsopolis
3. Avery Gladstone – Expert

## EXHIBITS

Exhibit 1 – Transcript of Blake Katsopolis and Kyler Gibbler's Conversation

Exhibit 2 – Cameron Katsopolis' High School Transcript

Exhibit 3 – Cameron Katsopolis' College Application

Exhibit 4 – News and World Reports Admission Statistics

Exhibit 5 – Riley Tanner's CV

Exhibit 6 – Avery Gladstone's CV

Exhibit 7 – Cameron Katsopolis' Running stats (PRs and race times)

Exhibit 8 – Cameron Katsopolis' deleted social media post

Exhibit 9 – Riley Tanner's Award for Dedication of Justice

Exhibit 10 – Riley Tanner's administrative leave documentation

Exhibit 11 – Copy of SAP bank statement

Exhibit 12 – Proof of Cameron Katsopolis' ADHD

Exhibit 13 – Cameron Katsopolis' Scantron

Exhibit 14 – Donation Letter

Exhibit 15 – Drew Donaldson's handwritten notes from interview with Cameron

## STIPULATED FACTS

1. All exhibits included in the problem are accurate reproductions of the originals.
2. All witness statements are signed by the respective witness and are authentic.
3. Stipulations cannot be contradicted or challenged.
4. Both parties have stipulated that the material in the Case Summary does not constitute evidence, and no reference to the allegations or facts therein may be entered or referenced during the trial.
5. All parties are properly before the District Court. Jurisdiction and venue are proper.
6. Exhibit 3 is a true and correct copy of the application received by the College of Colorado for Cameron Katsopolis.
7. Exhibit 4 is a true and correct copy of information related to admissions at the College of Colorado.
8. Exhibit 10 is a true and correct copy of the administrative leave statement in Riley Tanner's employment file at the Colorado Springs Police Department.
9. Exhibit 11 is a true and correct copy of the bank statement for Support Your College Athletic Program and all schools listed are legitimate colleges.
10. Exhibit 12 is a true and correct copy of Cameron Katsopolis' 504 Eligibility Determination Report
11. All other objections to Exhibits 3, 4, 10, 11 and 12 are preserved for ruling during trial.
12. Drew Donaldson is an employee of the College of Colorado.
13. The College of Colorado is a state institution of higher education.

<b>DISTRICT COURT, PITKIN COUNTY, COLORADO</b> 506 E. Main St., Aspen, CO 81611 970-925-7635	<b>▲ COURT USE ONLY ▲</b>
<b>THE PEOPLE OF THE STATE OF COLORADO</b>  <b>v.</b>  <b>BLAKE KATSOPOLIS</b>	
Wilson F. McKibbet Ninth Judicial District District Attorney, # 999342 109 8 <sup>th</sup> Street, Suite 905	Case Number:  2022 CR 9999
<b>COMPLAINT AND INFORMATION</b>	

**CHARGES: 2**

**COUNT 1: CONSPIRACY, C.R.S. 18-2-201(1) COUNT**

**2: BRIBERY, C.R.S. 18-8-302(1)(a)**

Wilson F. McKibbet, District Attorney for the Ninth Judicial District of the State of Colorado, in the name and by the authority of the People of the State of Colorado, informs the court of the following offenses committed, or triable, in the County of Pitkin:

**COUNT 1: CONSPIRACY**

On or about September 1, 2020, through February 28, 2022, Blake Katsopolis, unlawfully, feloniously and knowingly conspired with Kyler Gibbler and/or others to commit the crime of bribery and with the intent to promote or facilitate the crime of bribery agreed with Kyler Gibbler and/or others to engage in conduct which constitutes the crime of bribery or an attempt to commit the crime of bribery, or agreed to aid Kyler Gibbler and/or others to aid Kyler Gibbler and/or others in the planning or commission of the crime of bribery or the attempt to commit the crime of bribery, to-wit, bribing Drew Donaldson to aid in the admission of Cameron Katsopolis to the College of Colorado.

**COUNT 2: BRIBERY**

On or about February 1, 2021, through March 1, 2022, Blake Katsopolis, unlawfully, feloniously and knowingly offered, conferred or agreed to confer a pecuniary benefit upon Drew Donaldson, to wit: \$200,000, with the intent to influence Drew Donaldson to provide a scholarship to Cameron Katsopolis for the College of Colorado's cross-country team which in turn would enhance the admission of Cameron Katsopolis as a student at the College of Colorado.

Both offenses against the peace and dignity of the People of the State of Colorado. Dated this 15<sup>th</sup> day of June, 2022.

Wilson F. McKibbet  
Ninth Judicial District Attorney

*/s/ Wilson F. McKibbet*  
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Wilson F. McKibbet, #99342

DISTRICT COURT PITKIN COUNTY, COLORADO 506 East Main Street Aspen, Colorado 81611	▲ COURT USE ONLY ▲
<b>THE PEOPLE OF THE STATE OF COLORADO</b> Plaintiff  v.  <b>BLAKE KATSOPOLIS</b> Defendant	
<b>DENIAL OF MOTION TO DISMISS</b>	

THIS MATTER comes before the Court on the Defendant’s Motion to Dismiss Pursuant to Crim. P. 12(b)(1). The Court, having considered the motion, relevant portions of the court file, and the arguments of counsel presented at a recent hearing, finds and rules as follows:

The Defendant asserts that he is not subject to conviction for Bribery under C.R.S. § 18-8-302(1)(a), and that he is also therefore not subject to conviction for Conspiracy to commit that same offense, because the person identified as the target of the alleged bribery, Drew Donaldson, is legally not a public servant. The People agree that the issue is properly presented under Crim. P. 12(b)(1), but they otherwise disagree with the merits of Defendant’s argument and oppose the Motion to Dismiss.

At its heart, bribery under C.R.S. 18-8-302(1)(a) involves offering or providing a monetary benefit to a public servant. The parties agree that the claimed public servant in this case is an employee of the College of Colorado and that the college is a public university. The issue of whether an employee of a public university is a public servant appears to be one of first impression in Colorado.



Pursuant to C.R.S. § 18-1-901(o), the term “public servant” includes “any ... employee of government ... and any person participating in ... performing a governmental function.” C.R.S. § 18-8-302(1)(i) defines the term “government” to include “the United States, any state, county, municipality, or other political unit, any branch, department, agency, or subdivision of any of the foregoing, and any corporation or other entity established by law to carry out any governmental function.” C.R.S. § 18-8-302(1)(j) defines “governmental function” to include “any activity which a public servant is legally authorized to undertake on behalf of government.”

The public university system in Colorado is created by C.R.S. §§ 23-1-101 et seq. The College of Colorado is specifically addressed by C.R.S. §§ 23-57-101 et seq. Decisions regarding student applications are subject to several statutory requirements. See ex. C.R.S. § 23-5-106.5. As such, to the extent an employee of a public academic institution is given authority to determine whether an applicant will be admitted as a student, such employee is an employee of government and is also performing a governmental function. Accordingly, the Motion to Dismiss is denied. Additionally, a jury instruction defining “public servant” may be presented to the jury that is consistent with this ruling.

SO ORDERED this 31st day of October, 2022

BY THE COURT:



John W. Madden, IV  
District Court Judge

## **JURY INSTRUCTIONS**

### **Instruction No. 1**

The Defendant, Blake Katsopolis, is charged with committing the crimes of Conspiracy and Bribery occurring on or about September 1, 2020, through March 1, 2022 from complaint. The Defendant has pleaded not guilty.

The charge against the Defendant is not evidence. The charge against the Defendant is just an accusation. The fact that the Defendant has been accused is not evidence that the Defendant committed any crime.

### **Instruction No. 2**

Every person charged with a crime is presumed innocent. This presumption of innocence remains with the defendant throughout the trial and should be given effect by you unless, after considering all of the evidence, you are then convinced that the defendant is guilty beyond a reasonable doubt.

The burden of proof is upon the prosecution to prove to the satisfaction of the jury beyond a reasonable doubt the existence of all of the elements necessary to constitute the crime charged.

Reasonable doubt means a doubt based upon reason and common sense which arises from a fair and rational consideration of all of the evidence, or the lack of evidence, in the case. It is a doubt which is not a vague, speculative or imaginary doubt, but such a doubt as would cause reasonable people to hesitate to act in matters of importance to themselves.

If you find from the evidence that each and every element of a crime has been proven beyond a reasonable doubt, you should find the defendant guilty of that crime. If you find from the evidence that the prosecution has failed to prove any one or more of the elements of a crime beyond a reasonable doubt, you should find the defendant not guilty of that crime.

### **Instruction No. 3**

A fact may be proven by either direct or circumstantial evidence. Under the law, both are acceptable ways to prove something. Neither is necessarily more reliable than the other.

Direct evidence is based on first-hand observation of the fact in question.

Circumstantial evidence is indirect. It is based on observations of related facts that may lead you to reach a conclusion about the fact in question.

#### **Instruction No. 4**

You are the sole judges of the credibility of each witness and the weight to be given to the witness's testimony. You should carefully consider all of the testimony given and the circumstances under which each witness has testified.

For each witness, consider that person's knowledge, motive, state of mind, demeanor, and manner while testifying. Consider the witness's ability to observe, the strength of that person's memory, and how that person obtained their knowledge. Consider any relationship the witness may have to either side of the case, and how each witness might be affected by the verdict. Consider how the testimony of the witness is supported or contradicted by other evidence in the case. You should consider all facts and circumstances shown by the evidence when you evaluate each witness's testimony.

You may believe all of the testimony of a witness, part of it, or none of it.

#### **Instruction No. 5**

The number of witnesses testifying for or against a certain fact does not, by itself, prove or disprove that fact.

#### **Instruction No. 6**

You are not bound by the testimony of witnesses who have testified as experts; the credibility of an expert's testimony is to be considered as that of any other witness. You may believe all of an expert witness's testimony, part of it, or none of it. The weight you give the testimony is entirely your decision.

#### **Instruction No. 7**

The elements of the crime of conspiracy are:

1. That the Defendant,
2. in the State of Colorado, at or about the date and place charged,
3. with the intent to promote or facilitate the commission of the crime of bribery,
4. agreed with another person or persons that they, or one or more of them, would engage in conduct which constituted the crime of bribery or an attempt to commit the crime of bribery, and
5. agreed to aid another person or persons in the planning or commission of the crime of bribery or an attempt to commit the crime of bribery, and
6. the defendant, or a co-conspirator, performed an overt act to pursue the conspiracy.

"Overt act" means any act knowingly committed by one of the conspirators, in an effort to accomplish some object or purpose of the conspiracy. The overt act need not be criminal in nature. It must, however, be an act that tends toward accomplishment of a plan or scheme, knowingly done in furtherance of some object or purpose of the charged conspiracy.

After considering all the evidence, if you decide the prosecution has proven each of the elements beyond a reasonable doubt, you should find the Defendant guilty of conspiracy.

After considering all the evidence, if you decide the prosecution has failed to prove any one or more of the elements beyond a reasonable doubt, you should find the Defendant not guilty of conspiracy.

**Instruction No. 8**

It is no defense to a charge of conspiracy that the defendant or the person with whom the defendant conspires did not occupy a particular position or have a particular characteristic which is an element of the crime, if the defendant believes that one of them did.

**Instruction No. 9**

The elements of the crime of bribery are:

1. That the defendant,
2. in the State of Colorado, at or about the date and place charged,
3. offered, conferred, or agreed to confer any pecuniary benefit upon a public servant,
4. with the intent,
5. to influence the public servant's exercise of discretion, or other action in their official capacity.

After considering the evidence, if you decide the prosecution has proven each of the elements beyond a reasonable doubt, you should find the defendant guilty of bribery.

After considering the evidence, if you decide the prosecution has failed to prove any one or more of the elements beyond a reasonable doubt, you should find the defendant not guilty of bribery.

**Instruction No. 10**

A crime is committed when the defendant has committed a voluntary act prohibited by law, together with a culpable state of mind.

"Voluntary act" means an act performed consciously as a result of effort or determination.

Proof of the voluntary act alone is insufficient to prove that the defendant had the required state of mind.

The culpable state of mind is as much an element of the crime as the act itself and must be proven beyond a reasonable doubt, either by direct or circumstantial evidence.

In this case, the applicable state of mind is as follows:

A person acts “intentionally” or “with intent” when their conscious objective is to cause the specific result proscribed by the statute defining the offense. It is immaterial whether or not the result actually occurred.

**Instruction No. 11**

In this case, certain words and phrases have particular meanings.

Accordingly, you are to use the following definitions where these words and phrases appear in these instructions.

A “public servant” includes any employee of a state institution of higher education who has the authority to decide whether an applicant will be admitted as a student of the institution.

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**KYLER GIBBLER – WITNESS STATEMENT – PROSECUTION**

My name is Kyler Gibbler. You have probably heard my name in the news and on documentaries referred to as the “mastermind” behind the college entrance cheating scandal. This has been dubbed by the Federal Bureau of Investigation as the “Key Scandal” since I provided the side door “key” for many wealthy families to obtain admission for their child into prestigious colleges and universities.

Let me tell you more about myself. I am a college graduate, having earned a Bachelor of Arts in marketing from Rocky Mountain College in Aspen. I later obtained a master’s degree in Counseling at the University of Southern Utah (USU). I had difficulty obtaining admission to USU, as my grade point average at Rocky Mountain College was only a 2.7. I learned a lot about marketing but not much of anything else. I mostly spent a lot of time frequenting the tourist traps in Aspen. My Graduate Record Examination score was only a 140. I knew I needed help, so I investigated some admissions counseling agencies. I found these agencies would not be much help unless I had rich parents who could make a substantial “donation” to the school. My parents were not rich (and not likely to help me anyways). They said I had to “earn my own way” into a program. Luckily USU accepted me, and I earned a 3.2 grade point average. I always felt that a college admissions counseling program should provide better service to admissions, which is why I focused on college admission counseling at USU. But the idea of donations to get into college for a bachelor’s or master’s program stuck with me.

While at USU, I started a college admissions counseling service. The idea was to give prospective students that leg up that I had never been given. I formed a limited liability company, which I called “Easy College Admissions, LLC” (“ECA”, for short), and I began running internet ads targeting the parents of students who could use some professional help completing college admission applications, reference letters, and preparing for the ACT/SAT tests. I quickly found success and became familiar with admissions programs and personnel at many of the universities and colleges throughout the United

25 States.

26 One of the things I learned from my numerous contacts at college admissions departments across  
27 the country is that money does not *always* buy a student admission to a college or university. Large  
28 donations are often made by wealthy families, including sponsoring new buildings for millions of dollars,  
29 but even those donations do not guarantee admission for those parents' children.

30 This revelation led me to discover and implement what I now call the "side-door key" to gaining  
31 college admission. This "side door" is open for students who excelled at high school sports, especially  
32 some of the less funded programs at a college, such as cross-country, tennis, track, swimming, and  
33 wrestling, who have good ACT or SAT scores (as elite institutions still implement base line requirements  
34 for those test scores for great high school athletes); and, most importantly, that donate to under-funded  
35 college athletic programs. These donations are especially helpful to admissions for these student athletes  
36 because the better funded programs tended to promote the coach's stature within the college coaching  
37 community. This is especially true where I could find coaches that complain to me that their donations  
38 are falling behind their salary needs, which I take as a clear invite to "donate" to those programs.

39 This led to my idea to market a side door admission service to wealthy parents. I sold this as an  
40 opportunity for those parents to get what they wanted without having to go through the considerably  
41 more costly "back door" process, and I made a lot of money assisting them in the process. I started  
42 accepting donations from these parents into a non-profit, tax-exempt entity I created. And then, in turn,  
43 I would donate a portion of these donations to under-funded college athletic programs. This minimized  
44 my tax liabilities and allowed the parents to deduct their donations. I called this entity "Support Your  
45 College Athletic Programs" or "SAP," and secured a 501(c)(3) nonprofit status for SAP from the Internal  
46 Revenue Service. I even donated the first \$10,000 out of my own pocket to make it look more legitimate.

47 With this entity in place, I engaged in an Internet marketing program guaranteeing parents that  
48 their child would be admitted to the college of their choice if they purchased the "premium package" of

49 my college admissions counseling services. The FBI later made me remove this webpage from the Internet,  
50 and I can no longer access this domain. Therefore, I cannot produce a copy of the website, as requested  
51 by defense counsel. Once I was able to convince parents to retain my services through ECA, we would  
52 often discuss additional fees for several available “add-on” services such as retaining a proctor for  
53 ACT/SAT test taking and fees for professional services allowing a student to take these tests at private  
54 locations.

55           Given the highly competitive nature of college admissions, I was flooded with confidential  
56 inquiries from parents that had heard of my work from other parents or saw my marketing “guaranteeing”  
57 I could get their kids in the school of their dreams. After some cursory screening, and once the family paid  
58 my initial fee of \$25,000, I would come right out and tell my prospective clients that, in exchange for hiring  
59 me and for making a several hundred-thousand-dollar donations through SAP, I could virtually guarantee  
60 their child admission to the school of the parents’ and student’s choice. Most parents understood this six-  
61 figure donation was pennies on the dollar compared to how much of an endowment they would need to  
62 make directly. In fact, mostly every set of parents who hired me was already wellaware of the entire Key  
63 Scheme. Still, some parents didn’t think it could work for them because their child was so obviously not  
64 an athlete, but I could always overcome this for the right donation. This was true of Cameron Kastopolis.

65           Shortly after Blake Katsopolis contacted me about Cameron, it became clear to me that Cameron  
66 was a bright student, but far from an accomplished athlete. It was clear that I needed to create an  
67 admission profile for Cameron that had a great ACT score and presented Cameron as an athlete in one of  
68 the lesser-known sports. The Katstopolises made two things clear when they decided to hire me to work  
69 with Cameron: First, Cameron was not to know anything about any donations or the outrageous amounts  
70 they were paying me directly for my services—it all needed to seem like I was just a “normal” admission  
71 counselor; and second, it was crucial to them that Cameron attend the College of Colorado. It seems  
72 Blake had attended the College of Colorado, and Blake had always dreamed that Cameron would carry



73 on this legacy. Blake was not as familiar with the details of the Key Scheme as most of my clients are, so  
74 I had to explain to Blake that even large donations to the College would likely not help. However, some  
75 well-placed donations with ACT and the College was the first starting point. Blake understood this and  
76 told me money was no issue. They could pay me \$1,000,000 for my services and all of the necessary  
77 “add-ons,” so long as I would guarantee Cameron’s admission. The money was transferred into SAP’s  
78 account, and I began my work.

79 I learned that Cameron has a documented history of ADHD, and that through a 504 plan,  
80 Cameron had been allowed accommodations when taking tests. I then reached out to one of my ACT  
81 contacts and, for a small \$5,000 fee, I was able to secure permission to provide Cameron a private  
82 proctor while taking the ACT. Exhibit 12 is a copy of the 504 plan I received from Blake and used to  
83 paper the request for permission. Cameron was ultimately able to take the test at a private location  
84 near the College of Colorado in Colorado Springs. I then paid a colleague of mine, Matt Johnson,  
85 \$10,000 to proctor Cameron’s ACT test. Matt had obtained a perfect score on the ACT the year before and  
86 now did consulting with the ACT testing program, so he was quite familiar with the current ACT test. I  
87 arranged to have Cameron one-on-one with Matt in the private proctor room, and Matt took it from  
88 there. I did not ask Matt about his proctoring process, but it was successful. Cameron achieved a 34 out  
89 of 36 on the ACT. Next, I worked closely with Cameron on the actual college application. Once  
90 completed and signed by Cameron, I told Cameron I would submit it on Cameron’s behalf. This, I told  
91 Cameron, was my normal procedure. I did not tell Cameron that I modified the application after  
92 Cameron signed it to indicate that Cameron’s great grandmother had partial Ute Indian tribe ancestry,  
93 as Blake had instructed me to keep Cameron in the dark on this. (Native American heritage is a helpful  
94 criterion for admission to the College of Colorado.) I also doctored Cameron’s resume to show that  
95 Cameron was on the high school cross-country team and has qualified for the state tournament, when,  
96 in reality, Cameron is a casual runner at best. Luckily, Cameron had done enough non-official races that I

97 could put together what looked to be a legitimate portfolio of competition photos. After completing  
98 these changes, I provided a copy to Blake. Blake gave the go-ahead to submit this application to the  
99 College of Colorado. Exhibit 3 is that application.

100 After that, Blake and Cameron met with Drew Donaldson, the coach of the College of Colorado's  
101 cross-country team, during a tour of the College that I had scheduled. I had not worked with Drew before,  
102 so, my first approach with Drew about getting Cameron on the cross-country team was to show Drew  
103 Cameron's college application. At first, Drew hesitated, but when I said I could get \$200,000 for the  
104 program, Drew indicated there might just be a spot for Cameron on the team, but that Drew needed to  
105 interview Cameron first. I made sure that Drew knew not to mention Blake Katsopolis' donation during  
106 the interview with Cameron. I explained that Blake was quite sensitive about maintaining the impression  
107 that Cameron got in on merit. Drew agreed. I made the donation directly to Drew "for the team" and told  
108 Drew to provide a donation letter directly to Blake. Later, I learned that Drew did not actually award  
109 Cameron a spot on the team. I was shocked, but that's what happens when there is not a solid working  
110 relationship.

111 Finally, at Blake's request I made three \$25,000 donations in Blake's name to different scholarship  
112 programs at the College of Colorado. Each of these helped underprivileged students attend the college.  
113 The rest of the \$1 million was retained by SAP. I was not surprised when Cameron was accepted. My Key  
114 program had once again been successful.

115 Not long after Cameron's admission, I received a call from Agent Riley Tanner from the FBI.  
116 Agent Tanner told me the FBI was investigating schemes to get students into college who otherwise  
117 would not qualify. Agent Tanner asked to meet with me to discuss this investigation. I obtained legal  
118 counsel, who ultimately set up this meeting. Apparently, Agent Tanner had plenty of evidence to secure  
119 my conviction on a number of federal felonies, but the FBI was willing to reduce my charges and  
120 potential sentencing recommendations if I cooperated. Agent Tanner indicated that the FBI wanted to

121 pursue criminal charges against the parents who had paid me money to get their children into college. I  
122 knew I had no choice, and I agreed to a plea deal where I would cooperate with the FBI's investigation in  
123 exchange for a single felony charge and a significant reduction in my jail sentence. My plea will be  
124 finalized at the conclusion of this investigation and prosecution of Blake Katsopolis and the other  
125 parents, provided I cooperate.

126 Before I had agreed to this plea deal, I had mentioned Blake Katsopolis to Agent Tanner, and  
127 Agent Tanner seemed particularly interested in Katsopolis, who is a well-known real estate developer.  
128 Riley wanted me to approach Blake and get a taped admission that Blake had paid me to get Cameron  
129 into the College of Colorado and was aware of the fraudulent schemes I used. I called Blake and said I  
130 always like to follow up with the parent to see if they were satisfied with my admissions work. Blake  
131 was clearly suspicious and didn't want to talk on the phone. Blake said, "you never know who might be  
132 listening," but told me we could meet in a neutral location.

133 Blake and I met at Starbucks after Riley and other FBI agents had wired me so they could  
134 listen and record the conversation. I told Blake that the real reason I wanted the meeting was that I was  
135 worried about an audit that was being conducted on SAP and how the IRS might discover the true nature  
136 of the donations Blake had approved. Blake seemed to understand that I was trying to get an admission.  
137 Blake immediately denied knowing anything about the doctored test scores and application or the  
138 payment to the cross-country program in exchange for a spot. It was clear to me from Blake's  
139 mannerisms and tone of voice that Blake was just playing dumb out of suspicion I was wearing a wire. I  
140 have not read the transcript of the conversation, but I know the words Blake used were carefully chosen  
141 to ensure that, if a recording was being made, it would not contain anything incriminating. Blake knew  
142 something was up. Despite those fake denials, however, Blake knew from the very beginning every step  
143 in my scheme to guarantee Cameron's admission to the College of Colorado, despite Cameron's  
144 mediocre qualifications. Blake knew that Cameron wasn't the only student who I helped in that way,

145 and Blake surely would not have made nearly \$1 million in payments and in donations to my foundation  
146 if that wasn't the case.

147 I have carefully reviewed this statement. It is true and accurate, and it includes  
148 everything I know of that could be relevant to the events I discussed. I understand that I can and must  
149 update this statement if anything, new occurs to me before the trial.

150 By: KylerGibbler

151 Kyler Gibbler

1 **RILEY TANNER – EXPERT WITNESS STATEMENT –PROSECUTION**

2 My name is Riley Tanner, and I am a Special Agent for the Securities Fraud  
3 Division of the Federal Bureau of Investigation. I was the lead investigator for Operation Varsity Blues.  
4 We initially were investigating a “pump-and-dump” stock scheme conducted by the infamous Mr. Corrie  
5 Lobin. After searching Mr. Lobin’s home pursuant to a valid warrant, we advised Lobin that he faced  
6 serious charges of stock fraud and manipulation. Mr. Lobin then asked us if he could direct us  
7 toward another fraud scheme would we reduce his charges or not charge him at all on the stock fraud  
8 matters. Per our normal practice, we advised Lobin that we would do what we could, but no promises  
9 could be made until we knew more.

10 Lobin thought for a few moments and then said he had paid Kyler Gibbler a large  
11 sum of money to get Lobin’s daughter into a prestigious Ivy League School. Lobin said he knew there  
12 were many other parents who had also paid Gibbler for this “college admission” service. Essentially,  
13 Lobin said, Gibbler’s scheme involved taking money from parents and using that, in part, to bribe college  
14 athletic coaches to admit students to their athletic programs regardless of their athletic ability and also  
15 to bribe or hire exam administrators to falsify ACT and SAT answers. I was appalled. I couldn’t believe  
16 rich people could get away with such a scheme while normal, everyday working parents often failed to  
17 get their students into the college of their child’s choice.

18 I immediately focused a new investigation on Gibbler. Once I had gathered  
19 enough evidence against Gibbler I was able to get a Court order to wiretap Gibbler’s phone. That gave us  
20 all the evidence we needed, and I confronted Gibbler. Gibbler, like Lobin, wanted to work out a deal. I  
21 really wanted to get those rich, entitled parents and with little effort was able to convince Gibbler to  
22 cooperate with our investigation. We had no idea how deep the rabbit hole would go.

23 But first, a little about myself. My CV, which is exhibit 5, explains some of this,  
24 but I have always had a passion to “do a good turn daily.” I attended the College of Colorado from 1996-

25 2002. I majored in Kinesiology with a minor in Women's Studies. During college, I worked as a security  
26 guard for a Circle T gas station. I wasn't the best student, but I was determined to graduate. After my  
27 third senior year, I graduated and began working for the Colorado Springs Police Department or CSPD as  
28 a patrol officer and for the first several years I worked mostly the graveyard shift. I saw all types of  
29 things: kids vandalizing vacant buildings, reckless speeding, and cyclists refusing to stay in the bike lane.  
30 The cyclists were the most egregious offenders. While working for CSPD, they paid for me to attend the  
31 Colorado Law Enforcement Training Academy. There I learned investigative techniques including how to  
32 investigate white collar types of crimes. White collar crimes seemed to be becoming more frequent  
33 especially at that time in El Paso County. I was also trained in how to find and prosecute financial fraud.

34 Over the next fifteen years, I rose in the ranks in law enforcement to Detective,  
35 where I lead the white-collar division. About five years into my law enforcement career, I received  
36 an award for my dedication to justice. It is the award provided as exhibit 9 and is one of my proudest  
37 moments. Of course, if you are in law enforcement long enough, somebody will complain about  
38 something you did. Exhibit 10 is a letter CSPD put in my personnel file in connection with once such  
39 complaint. Although I was placed on unpaid leave for "refusing to stop pursuing a closed investigation"  
40 a few years later, I believe my determination is an asset. I refuse to "walk away" when a wrong has clearly  
41 been committed.

42 Later on, I applied to the FBI. I had just completed an investigation that led to  
43 the arrest of a financier who perpetrated a Ponzi scheme in the Aspen area. That was four years ago, and  
44 I was not surprised when the FBI immediately accepted my application. I was assigned to the Securities  
45 Fraud division as a special agent. We would go after CEOs and Chairmen that would engage in  
46 securities and stock fraud, and that's what led us here today. As I said earlier, Mr. Lobin led us to Kyler  
47 Gibbler. Kyler Gibbler is a scam artist. Over the course of the investigation, we learned Gibbler had a  
48 questionable history of telling grandiose tales, like claiming to be on the boards of Fortune 500

49 Companies. Gibbler told people that one of Gibbler's companies had over 200 employees and that  
50 Gibbler graduated from an Ivy League university—neither of which were true. Gibbler even claims to  
51 have climbed Mount Everest!

52                   The wiretap on Gibbler's phone revealed that Gibbler had an expansive  
53 network that spanned across the nation's most prestigious universities. Gibbler would use this network  
54 to circumvent the admissions process through a test-cheating scheme and an athletic recruitment ruse.  
55 Gibbler would pay coaches to fraudulently classify the applicant as an "athlete" being recruited for  
56 underfunded sports, like the cross-country team. Gibbler even paid proctors to modify the test scores of  
57 applicants. Gibbler raked in millions from parents by fraudulently getting their kids into elite colleges.  
58 Gibbler had the parents pay the money to a nonprofit so they get a deduction for their "donation" and  
59 then would use some money to bribe coaches and hire test proctors. The rest was kept! One bank  
60 record even showed that there was millions of dollars in the account. Exhibit 11 is the record I'm talking  
61 about.

62                   Once we confronted Gibbler, Gibbler agreed to cooperate by wearing a wire to  
63 help me obtain evidence against all these high-powered, rich parents. Gibbler helped the FBI record  
64 dozens of phone calls and/or arranged recorded meetings with these parents, and Gibbler got a  
65 number of these parents to admit to the conspiracy. This led to solid cases which the Department of  
66 Justice successfully prosecuted. Other parents were suspicious which made it harder for me to "get  
67 them."

68                   Blake Katsopolis was one of these suspicious parents. We prepared a sting  
69 operation against Katsopolis based on what Gibbler told us. However, we knew Katsopolis was smart  
70 because Katsopolis refused to talk on the phone and only agreed to talk with Gibbler in person. A  
71 recording of the meeting was made; but, somehow, the original recording was lost. Regardless, a  
72 transcript was made before it was lost. Exhibit 1 is a copy of the transcript.

73 I know the transcript is accurate as I listened to the conversation as it occurred.  
74 Then I listened to the tape while reading the transcript. It is accurate. During their meeting, Gibbler tried  
75 getting Blake Katsopolis to admit to knowledge of the admissions scheme for Blake's child. Gibbler tried  
76 to get Blake to admit Blake knew what was up and for what the payments made to Gibbler would be used.  
77 Blake appeared to catch on, but it was clear that Blake Katsopolis denied all knowledge of this because  
78 Blake was suspicious. Blake acted and talked like there was an awareness that the police were listening. I  
79 could tell by Katsopolis' tone and vocal pattern. Blake Katsopolis absolutely knew we were listening.  
80 There is no doubt in my mind that Blake tried to make a show of denying knowledge of the scheme for  
81 Cameron and for what the monies Blake paid Gibbler would be used. This conclusion is based on my  
82 knowledge, training, and experience.

83 After I heard the recording of their meeting, I was able to get enough other hard  
84 evidence through a subpoena by which I obtained a copy of the scantron used for Cameron's ACT  
85 scores, which is exhibit 13. I noticed the scantron had more eraser marks than usual, and the answers  
86 with eraser marks on them were darker than the others—which meant someone else was changing the  
87 answers with a different pencil! There is no way those scores are real based on the scantron's  
88 presentation. Remember, I found evidence of funds transferred between Blake and Gibbler totaling  
89 approximately \$1,000,000. Blake is honestly trying to argue that Blake didn't know where that money  
90 was going? Who pays \$1,000,000 and doesn't know or doesn't care to ask where their money is going?

91 I turned over the transcript and evidence I had against Blake Katsopolis to the  
92 Assistant United States Attorney, but the AUSA declined the case due to "lack of evidence." I couldn't  
93 believe it. Just because Blake denied knowledge of the scheme in the recorded conversation was no  
94 reason not to prosecute. We had successfully prosecuted other parents on less evidence. I knew I  
95 should just let it go, but like when I worked for the El Paso law enforcement, I was determined not to let  
96 Katsopolis get away with this.



97 I was assigned to a joint task force investigating a fraud case in Pitkin County, so  
98 I called my contact at the Pitkin County District Attorney's office to help us present the case to the 9<sup>th</sup> JD  
99 District Attorney. I explained to my contact that we had Blake Katsopolis dead to rights on this one. I  
100 told him that my boss at the FBI just was not being realistic. After a long conversation, I met with the  
101 District Attorney. It turned out the District Attorney didn't like rich parents getting away with things and  
102 getting special favors. He agreed to file charges. I may get in trouble again for not "letting go" of an  
103 investigation but these entitled parents must not get away with this.

104 I have carefully reviewed this statement. It is true and accurate, and it includes  
105 everything I know of that could be relevant to the events I discussed. I understand that I can and must  
106 update this statement if anything, new occurs to me before the trial.

107

108

By: RileyTanner

109

Riley Tanner

1 **DREW DONALDSON – WITNESS STATEMENT –PROSECUTION**

2 My name is Drew Donaldson and I coach the College of Colorado’s cross-country  
3 team. I have been a cross-country coach for over twenty years, and I have worked at the College of  
4 Colorado for the past eight years. I know what it takes to compete at the college level and what it takes  
5 to keep a college cross-country program running. I have had hundreds, if not thousands, of  
6 conversations with student athletes interested in competing at the top levels.

7 Let me start by telling you a bit about how the college athletics recruiting  
8 process works. The college recruiting process can be confusing. There are tons of recruiting rules that  
9 vary by division, and the process varies widely based on the sport, and how heavily an athlete is being  
10 recruited. Top level recruits, especially in high profile sports like football and men’s basketball, will be  
11 sent tons of letters, receive tons of phone calls and may be offered athletic scholarships before they  
12 even enter high school. These athletes won’t have to take much initiative in the recruiting process. For  
13 recruits who are not as well-known nationally, they will have to be more proactive in the recruiting  
14 process, and they will often have to sell themselves to college coaches to get a scholarship or a  
15 guaranteed spot on a team.

16 The sport the athlete plays will also have a huge influence on the process.  
17 Some sports, like football and men’s basketball, are extremely high-profile and bring in a ton of money  
18 for the school, making selection for those programs extremely selective (and scholarships much more  
19 likely). Other sports are highly selective because only a few schools in the country offer those programs.  
20 For example, there are currently only 16 NCAA men’s gymnastics programs. Recruiting for those 16  
21 teams is highly competitive and the athletes selected are typically well-known nationally and  
22 internationally. It would be impossible for a student athlete to be able to fake their way on to one of  
23 those teams.

24 There are, however, low profile sports that bring in little in the way of

25 money, notoriety, or attention compared with football and basketball. In college athletics, volleyball,  
26 water polo, sailing, tennis, cross-country, and soccer are relatively small-time affairs that don't fill  
27 stadiums or drive billion-dollar media contracts. Unlike football and basketball, there is little in the  
28 way of formal rankings or general knowledge for what are seen as "minor" sports. For that reason,  
29 admissions officials usually have to take coaches like me at their word when we tell them that an  
30 applicant is worthy of a spot on a volleyball, soccer, cross-country, or sailing team.

31                   There's another important variable here, though, and that is this: just like the  
32 high-profile sports of football and basketball, coaches in the so-called Olympic sports are generally  
33 allowed to reserve several slots each year for students who might not otherwise gain admission. These  
34 slots are often in addition to those reserved for the truly elite athletes who receive athletic scholarships or  
35 their equivalent at the most selective universities. The practice of reserving spots for athletes in minor  
36 sports has grown in recent years as more colleges commit to pursuing excellence in every activity. As  
37 the United States' population continues to grow, slots at the most selective colleges are more  
38 competitive than ever. Even so, there are usually a few spots open in the lower profile sports as there  
39 are just not enough athletes to fill those positions. The way athletic recruiting works at College of  
40 Colorado is that each sport is given a certain number of spots out of the entire student body that can  
41 be filled with student athletes. For example, our cross-country team has 22 positions, and we are given  
42 22 spots to be filled by student athletes. Because cross-country is not a well-known sport but has ties to  
43 some long distance running Olympic events, the school allows our team to fill those spots.

44                   Now, while some of the top athletes receive scholarships, many intercollegiate  
45 athletes who do not receive aid are still recruited to participate in sports at the collegiate level. Many  
46 student athletes are responsible for 100% of their tuition, and this is especially true of highly  
47 competitive programs like the College of Colorado. For that reason, we have some students each year  
48 who have been recruited for sports but never show up to practice. They can continue at the college

49 because they have been admitted and pay their own tuition, and often nobody keeps track of those  
50 students. The last thing you should know about our program is just how under-funded we are compared  
51 to, say, football or basketball. My track and field athletes are outstanding. I believe they have the  
52 capacity to compete with the very best across the country. But they don't always get that opportunity,  
53 because we don't have the budget to make it happen. We end up taking road trips to regional meets  
54 instead of flying to national events. We typically rely on fundraisers to go on road trips and have even  
55 had student car washes and bake sales to raise money for essentials like running shoes and uniforms. I  
56 understand the reason for it, from the administration's perspective: the College typically loses money  
57 on the low-profile sports like mine. There are very few ticket sales, concessions, ads, or licensing of  
58 apparel in the track space. By contrast, the College of Colorado sells out nearly every football and  
59 basketball game and receives millions of dollars in apparel sales, concessions, and donations from  
60 boosters to keep those programs competitive. There is also money that comes in from television deals,  
61 ad sales at the stadium, and licensing deals with a variety of goods and service providers.

62                   So now let me tell you a bit about my interactions with Kyler Gibbler and the  
63 Katsopolis family. Kyler Gibbler was introduced to me as a "recruiting consultant" who was interested in  
64 helping athletes in lower profile sports gain admission to prestigious colleges. I was excited to meet with  
65 Gibbler because College of Colorado mainly recruits from the metro region and the College was looking  
66 to expand its recruiting pool nationally and even internationally. The College was really interested in  
67 attracting the top prospects and I was interested in developing a world class cross-country team.

68                   Gibbler was really easy to talk to and was very flattering of me and my  
69 work. Gibbler also mentioned the program's well-known money issues. Gibbler was very  
70 knowledgeable about college athletics finances. Gibbler described in great detail the differences in  
71 budgeting and fundraising for lower profile sports compared to high-profile sports like football and  
72 basketball. Gibbler knew the College's administrators were not interested in funding the low-profile

73 sports because these sports are not seen as money makers for the College. Gibbler mentioned that I was  
74 one of the lowest paid cross-country coaches in the country and that I did such amazing work with our  
75 athletes that I really should be paid something more than I was making. I had to agree, but we also  
76 had a small program and, as Gibbler already mentioned, the program did not have the money to pay  
77 me a higher salary. And Gibbler reminded me that, by contrast, the football coach at College of Colorado  
78 is the highest paid employee at the College.

79                   The conversation then moved to an athlete Gibbler wanted to help get  
80 accepted to College of Colorado, by the name of Cameron Katsopolis. Gibbler said Cameron's parent,  
81 Blake Katsopolis, was extremely wealthy and was also an alumnus of the College. Gibbler indicated that  
82 Blake was willing to donate \$200,000 to the cross-country program with a mutual understanding that  
83 Cameron would also be accepted to the school. That amount of money would be a lot of support for my  
84 program, and I was really excited about the possibility of attending larger, competitive tournaments,  
85 and perhaps even compete for a national title. I asked my Athletic Director if this was something we  
86 could look into, but my Athletic Director told me that the Katsopolis family would need to donate at least  
87 ten times that amount in order to have any impact on admissions. And while I have a few guaranteed  
88 spots to give every year, I had already used the team's available recruiting spots for admissions.

89                   Gibbler suggested taking Cameron as a walk-on and asked if I'd be willing to  
90 meet the Katsopolis family on their visit to the school. And although I had already used all of my  
91 recruiting spots for the year and I had a full team roster, I agreed to meet with the Katsopolis family to see  
92 if I could still talk Blake into making a donation to the program. I really wanted to get to a tournament  
93 that would qualify us for a national championship, and I figured that maybe Blake Katsopolis would be  
94 willing to donate something as an alum—if not hundreds of thousands of dollars, some smaller amount  
95 (and for a program relying on car washes and bake sales, every little bit helps). Before the meeting,  
96 Gibblersaid not to bring up the donation because Blake wanted Cameron to think Cameron would get in

97 “on merit, not on money.” I was confused by this comment as I was under the impression that of course  
98 Cameron was applying on merit— and, like I said, I’d already told Gibbler that I’d filled my roster for the  
99 year. But I did not want to jeopardize the chance of the program getting the donation or the raise I might  
100 receive if the College viewed me as a successful fundraiser, so I agreed not to mention money.

101                   During the meeting, I could immediately tell something was wrong. Exhibit 15 is a  
102 copy of the notes I made during this meeting. For instance, Cameron talked about running and wanting  
103 to try out for the team but didn’t seem to have run either track or cross-country in high school. That  
104 was one of the biggest red flags for me. In fact, when I asked about track experience other than cross-  
105 country, Cameron did not know the basics about competing in any track event and, as I tried to ask  
106 clarifying questions, I was steered away from the topic by both Blake and Gibbler. Cameron was  
107 intelligent and academically gifted, and seemed to be a decent athlete, you can see it in the race times  
108 that were shared from Meter Masters in exhibit 7, but there is a difference between being a casual  
109 jogger and elite college running prospect, like we recruit. I also found it strange that Blake and Gibbler  
110 seemed to be echoing each other’s talking points and raising issues that were purely superficial when it  
111 comes to running and athletic development, which I took note of during the interview. It was clear to me  
112 that the two had rehearsed whatever act they were putting on for me. I was so off put by the  
113 conversation, I made up some excuse about going to a meeting or something just so I could leave. Like I  
114 said, because Gibbler indicated Blake wanted to make a substantial donation to my program, I didn’t  
115 challenge anyone at the meeting; however, the whole situation left me very uncomfortable. At any rate,  
116 because I had already filled my roster, and because Blake and Gibbler made me uncomfortable, I did not  
117 take any steps to help get Cameron into the school. That was the last I heard or thought about the  
118 Katsopolis family and Kyler Gibbler for months.

119                   Later in the year, I got a call from Gibbler. Gibbler called to thank me for  
120 getting Cameron into College of Colorado. I told Gibbler I was excited for Cameron but that I didn’t really

121 do anything to help. Gibbler kept on talking and said Blake wanted to keep the promise about the  
122 donation and that Gibbler would write the program a check for \$200,000. I later received a check to the  
123 cross-country program from Gibbler's "SAP" foundation for \$200,000. I was surprised the money came  
124 from Gibbler and not Blake, but I just assumed it was a tax avoidance strategy or something like that. So,  
125 I sent a letter thanking SAP for the donation, it's exhibit 14 . I did not personally receive any money from  
126 Kyler Gibbler's donation. Every cent went to support student athletes in the track department. A short  
127 while after the check arrived, I saw Cameron on campus and asked how things were going. Cameron told  
128 me everything was going just fine and that they were planning on showing up on the first day of practice  
129 to try out for the team. True to Cameron's word, Cameron did try out. Cameron was a good runner, but  
130 not nearly good enough to make the team.

131                   A few months later, I heard Blake was being charged with crimes  
132 connected to Cameron's admission to College of Colorado. After the charges were brought, I went and  
133 looked at Cameron's application. I recognized the application as being the standard form used by the  
134 College, the admissions packet is kept by the College in the regular course of business, and I had  
135 reviewed hundreds of applications over the past few years so I knew where the records were located,  
136 how to access them, how to read them, and I am able to determine if the record is authentic. As soon  
137 as I read through the application, my jaw dropped. I saw information in the record that I knew to be  
138 false. Although it was clear to me from our conversation that Cameron never competed in cross-country  
139 (or track for that matter), the application stated Cameron went to the high school state tournament in  
140 cross-country. I was also able to confirm with some of my other athletes that they never saw Cameron at  
141 any cross-country event and the number of cross-country athletes in Colorado is small enough that  
142 someone would have definitely recognized and remembered Cameron had they competed at any state-  
143 level event.

144                   I have carefully reviewed this statement. It is true and accurate, and it includes

145 everything I know of that could be relevant to the events I discussed. I understand that I can and must  
146 update this statement if anything, new occurs to me before the trial.

147

148

By: Drew Donaldson

149

Drew Donaldson



1 **BLAKE KATSOPOLIS – WITNESS STATEMENT – DEFENSE**

2 My name is Blake Katsopolis, and I am a commercial real estate developer in  
3 Aspen. I am aware that the Pitkin County District Attorney has alleged that I conspired with Kyler Gibbler  
4 to bribe officials at the College of Colorado cross-country program to get my child, Cameron Katsopolis,  
5 accepted into the school as an undergrad. This could not be farther from the truth.

6 I attended College of Colorado from 1988 through 1992. Back then, nobody  
7 would have called it the “Yale of the Rockies;” it was just a small, private, liberal arts school—and not a  
8 particularly selective one. However, my College of Colorado education has been invaluable, and I truly  
9 do not think I would be where I am today if I had attended a large university. You see, I was just an  
10 average high school student, with no passion for academics or drive to succeed in academic or business  
11 endeavors. College of Colorado’s unique approach to a higher education—with low student-to-teacher  
12 ratios, a block scheduling system, and emphasis on self-study—was exactly what I needed, however, to  
13 break me from my academic rut. This individualized approach allowed me to form strong bonds with my  
14 professors and explore areas of study I was passionate about. I desperately wanted Cameron to have that  
15 same experience. When Cameron was a high school junior, we hired Kyler Gibbler on the  
16 recommendation of several of my business colleagues, who had told me that Gibbler was the best  
17 private college admissions counselor in the area. One of our friends even described Gibbler as a  
18 “miracle-worker” because Gibbler helped his daughter get accepted to her dream school: Harvard!

19 Cameron was a College of Colorado legacy though, and I had made numerous  
20 donations to the school, and numerous scholarship programs, over the years. Cameron was also near  
21 the top 25% of the class in terms of high school GPA and had always been an above-average test taker,  
22 despite having an ADHD diagnosis. Exhibit 12 is Cameron’s 504 plan, which lays that all out. All this to  
23 say, I didn’t think Cameron would need a “miracle worker” to get accepted into College of Colorado. At  
24 the same time, I was well-aware that the College of Colorado had become more of a national brand and

25 was among, if not at the top of, the list of most selective schools in the region. So, I figured why not hire  
26 Gibbler to offer additional insight on how to put Cameron’s best qualities forward? Besides, Gibbler was  
27 highly recommended by my colleagues and had a demonstrated track record of success. The services  
28 seemed like a wise and responsible avenue to consider.

29                   When Cameron and I first met with Gibbler, I was shocked that, in Gibbler’s  
30 opinion, College of Colorado would be a “reach” school for Cameron. Gibbler told us that, nowadays, top  
31 colleges are putting an outsized emphasis on extracurricular activities to differentiate between the  
32 overwhelming number of applicants with solid academic credentials, and Cameron’s lack of  
33 extracurriculars was a disadvantage. I later privately told Gibbler that I made nearly \$1 million in  
34 donations to College of Colorado over my lifetime, thinking that would maybe enhance Gibbler’s  
35 analysis. However, Gibbler told me that periodic five-figure and six-figure donations do not really move  
36 the needle. Gibbler said, maybe, buying a building or something like that—a serious multi-million-dollar  
37 donation—would get you a “back-door” second look from some admissions departments, but even that  
38 would not guarantee admission at a small school like College of Colorado. I was somewhat frustrated  
39 that, at least in Gibbler’s view, my alma mater wouldn’t recognize my previous financial loyalty, or put  
40 any significant weight on the family legacy, not to mention the bequest pledged in my will. But I  
41 remained hopeful that we could help Cameron get into College of Colorado through Gibbler’s character  
42 and academic coaching.

43                   I surely didn’t want Cameron to be known as the kid whose parents bought a new  
44 building to help Cameron secure admission, with the implication that Cameron did not deserve to be  
45 there. Gibbler said that wouldn’t be a problem. Gibbler claimed to be able to coach kids to reach their  
46 true potential, so they can ultimately submit an application that the admissions department will flag to  
47 approve. With Gibbler’s established relationships with decision makers at College of Colorado, and a  
48 generous donation made through the SAP program, Gibbler said we could be sure that Cameron would

49 get a “close look” by their admissions department.

50                   To increase Cameron’s chances, Gibbler recommended we try to get Cameron  
51 onto a sports team. Although Cameron had not been involved in any high school sports, I have long been  
52 an avid long-distance runner, and I got Cameron interested in running. Cameron participated in a couple  
53 of 5k and 10k races with me and had respectable finishes, which you can see in exhibit 7, but Cameron  
54 really preferred trail running, and I stopped pushing Cameron to join the school team after a while.  
55 Gibbler said that Cameron’s previous pursuit of long-distance running still might be enough to get  
56 Cameron considered by the College of Colorado cross-country team, and Gibbler asked us to send  
57 photographs of Cameron participating in races for Gibbler to incorporate into Cameron’s application. I  
58 had no idea that Gibbler was later going to use these photographs to falsely claim that Cameron had  
59 been on the high school cross-country team and had qualified for the state tournament. I understood  
60 Gibbler would mention this prior running experience in a favorable light, you know, apply some  
61 marketing grease. However, I was not aware Gibbler would fabricate any details of that experience.

62                   Well, conveniently, Gibbler had a relationship with one of the College of  
63 Colorado cross-country coaches, Drew Donaldson. Gibbler arranged a face-to-face meeting with  
64 Donaldson after Cameron toured the campus, which was, admittedly, awkward given Cameron’s lack of  
65 interest in the sport. Although Donaldson never outright denied the possibility that Cameron could walk  
66 on to the team, I do not believe Gibbler’s efforts to get Donaldson to consider Cameron for the team  
67 helped Cameron gain admission. Nor do I recall Donaldson suggesting that during the meeting. And as far  
68 as I am aware, Cameron was never actually invited onto the team anyway. During that meeting,  
69 Cameron was honest about not having participated in high school cross-country, which led me to believe  
70 that Cameron too was unaware that Gibbler had embellished Cameron’s application to reflect that  
71 Cameron was on the high school team. I certainly would not have approved of Gibbler making these  
72 false claims, and I know Cameron is not the type of person that would have stood for that either.

73                   Gibbler also suggested we set Cameron up with a private SAT and ACT tutor,  
74   which I would have expected any college admissions coach to do. Although this tutor helped Cameron  
75   secure alternative arrangements for both standardized tests, this did not seem out of the ordinary, given  
76   Cameron’s well-documented ADHD diagnosis. Since Cameron was very young, Cameron has been  
77   entitled to the accommodation of taking tests in a quiet environment or a separate room without  
78   distractions. The fact that Cameron’s scores were consistent with several practice tests with these  
79   accommodations was not surprising either. The accommodations created a more comfortable  
80   environment.

81                   All in all, I paid Gibbler a total of \$1 million, which included the fees for Gibbler’s  
82   services, private tutoring, and charitable donations to the school through SAP. Exhibit 11 is a print-out  
83   from that bank account, but I can’t tell you if it’s accurate. In fact, I’m not sure if that \$1,000,000 deposit  
84   is from me or someone else. I admit that using money for a potential advantage feels morally  
85   questionable, but only in the same way that billionaires securing spots for their kids in elite colleges  
86   through the “back door” of donating \$50 or 100 million also feels unfair. Gibbler had me convinced that’s  
87   just the way the system works, and that parents need to leverage the system for their kids to even be  
88   noticed. I believed all the money I donated would go towards need-based scholarships for underprivileged  
89   students to attend my alma mater, as all my previous donations to the school have done. Even though  
90   the idea behind these philanthropic investments was to help Cameron’s chances, it was for a worthy  
91   cause either way.

92                   Right before the nationwide scandal broke, Gibbler asked if we could meet.  
93   During this meeting, Gibbler told me Gibbler’s foundation, SAP, was being audited and that I could be  
94   implicated in the investigation of any financial improprieties. During this meeting, Gibbler also falsely  
95   characterized my donations to Donaldson and stated that I paid for Cameron’s ACT scores to be  
96   changed. I was shocked—that was not what we had ever talked about and not what I understood

97 Gibbler was doing as an admission counselor. It was so strange that Gibbler was claiming we had all  
98 these conversations we never had. I obviously was confused and, frankly, outraged. I later learned that  
99 Gibbler was wearing a wire trying to make a false conspiracy case for the FBI to deflect attention from  
100 Gibbler's own independent nefarious acts. Exhibit 1 is supposedly the transcript. I can't vouch for every  
101 line, but that's pretty much how that conversation went down.

102 I truly don't understand why I am being prosecuted in connection with Gibbler's  
103 scam, given my repeated denials during that recorded conversation that Gibbler and I ever discussed  
104 engaging in outright fraud or bribery to get Cameron accepted into College of Colorado. The FBI has  
105 exposed Gibbler as a world-class con artist. Gibbler is just trying to pin me—a well-known player in  
106 Colorado real estate—to give the prosecutors a big fish to go after in exchange for a plea deal. Gibbler  
107 cannot be trusted to tell the truth about my involvement in Gibbler's operation, or anything else.

108 I have carefully reviewed this statement. It is true and accurate, and it includes  
109 everything I know of that could be relevant to the events I discussed. I understand that I can and must  
110 update this statement if anything new occurs to me before the trial.

111

112

By: Blake Katsopolis

113

Blake Katsopolis

1 **CAMERON KATSOPOLIS – WITNESSSTATEMENT – DEFENSE**

2  
3 Hi! My name is Cameron.

4 Growing up in Aspen, it has always been my dream, and my parent’s dream TBH,  
5 for me to go to the College of Colorado. I mean it’s been ingrained in me since I could talk that, it was  
6 the place to go and where I would go. Everyone in my family has gone there. I mean, parents even have  
7 their names on a plaque in the fine arts building. If I didn’t get in, I think my whole family would be  
8 disappointed in me. The pressure is a lot sometimes. I can tell you how happy I was when I received my  
9 admissions letter. I worked hard for this.

10 My parents are both pretty well known for their successes in the real estate  
11 industry, so I’ve always been trying to break away from being under the family shadow and make a name  
12 for myself. I am not super close with my parents. Conversations with them are mostly on a “need to  
13 know basis,” and mostly on text since they travel a lot for work, or they are at parties, so I don’t really  
14 see them that much either. Our relationship always seems transactional. Nevertheless, I try hard to  
15 make them proud of me. They have given me a good life and a lot of opportunities that most kids don’t  
16 get. The limited time we do spend as a family, they always taught me good values like working hard and  
17 not relying on the family name.

18 Outside of school, I’ve always been very into sports and a self-proclaimed  
19 “outdoor enthusiast.” Mostly skiing, camping, and some trail running is my niche. I never liked the  
20 reviews that “Youtubers” made. I didn’t think they were ever honest about their reviews, so I decided to  
21 do my own thing about three years ago. I do a lot on social media and have developed a huge following,  
22 not just among “Aspenites”, but globally. I’m blue check mark verified on Instagram and have over 5  
23 million followers on Tik Tok. I think it has helped a lot with my admissions to school too in setting me  
24 apart from everyone else even though I never really intended it to be for the college app stuff. The social

25 media platform I've created is doing well, I'm making some money off sponsorship deals, etc. I am still  
26 not 100 percent sure what I want to do with my future or what major to pick. My parents weren't always  
27 really supportive of the social media stuff. They thought it was a waste of time and that I spent too much  
28 time online instead of working on my college application, testing and participating in other  
29 extracurricular activities. But when it came around to actually applying for school, they started to change  
30 their tune. They put in a lot of effort to get me extra help in college preparation, and they encouraged  
31 me to get more involved in school sports. My parents had really pushed for me to participate on the  
32 cross-country team since they were big runners and I've done a few races with them. I never did join the  
33 team though. If I am going to run, I am going to do it for me, not the school. They're not the ones who  
34 pay me for it like my sponsors might.

35                   Since getting into the College of Colorado has always been such a big deal,  
36 starting in my junior year, my parents started setting up these counseling sessions with Gibbler and some  
37 associate coaches to help me prep my application and improve my test taking skills. I took a ton of ACT  
38 practice tests with them as well as a multi week bootcamp. I think I even took every single past released  
39 exam for practice. My scoring average was between 33 and 35. I never kept those because I didn't think  
40 it would become a thing, and Gibbler told me some test taking psychologist said it was bad for the  
41 "vibes" and my energy or something if I held onto the old tests. I met with Gibbler and Gibbler's team  
42 about 3 times a week for a year. It isn't a lot when you think about the other kids from richer families at  
43 Pitkin High School, who have private counselors that have been meeting with them 3 times a week since  
44 kindergarten. I've always had to work harder than the average student for my grades. I've struggled with  
45 ADHD all of my life, but I've never let it hold me back. I was placed on a Section 504 in 2014 and that  
46 really helped. It allowed me to sit near the front of the class and I was also given extra time to take tests  
47 and, if needed, was allowed to take the tests in a separate room where I would not be distracted. I've  
48 also learned additional tools to help me focus on the tasks at hand. All this really helped, and my GPA

49 proves this. Having ADHD just meant that sometimes I'd need to put in more time or exercise to burn off  
50 my restless energy. Running helps me focus, its one tool I have learned along the way. But it also wasn't  
51 uncommon that I'd stay up until 2am on most school nights just so that I could keep up with my AP  
52 courses and keep my grades up. I have found the balance that works for me. After all, as my transcript  
53 shows in exhibit 2, I was able to achieve an unweighted 3.9 GPA (not counting extra GPA points for my  
54 AP or honors classes).

55 I was told by Gibbler that due to my ADHD I would receive an accommodation to  
56 take the ACT, but this meant I would need to take the test in Colorado Springs. At first, I thought it was a  
57 little weird that we were going to travel down to the Springs for my test, but my parents told me that we  
58 were going to make a trip out of it. After I was done with the test, we would check out some campuses  
59 that were down there, including College of Colorado, explore the hot springs, and hike the Manitou  
60 Incline, so I was pretty stoked about that.

61 All my hard work at the multi-week ACT prep course really paid off. It all went  
62 according to how I practiced it at home. I was in a separate room. I had to really pay attention because I  
63 had problems in the past filling in the right bubbles on the scantron. It's a really common symptom of  
64 my ADHD. I walked out of the exam feeling really good. Turns out I scored at 34. I know that Gibbler now  
65 claims that the proctor "fixed" some answers but that simply is not true. My score was right in my  
66 practice score range and I had no proctor "fixing" my "errors" then. Of course, I didn't always finish  
67 those practice tests in the allotted time. But taking extra time is something I have always been allowed  
68 to have due to my ADHD.

69 After the test, we went to the College of Colorado to tour the campus. Kyler  
70 introduced me to Drew Donaldson, the cross-country coach for the College of Colorado, and we talked  
71 for a while about opportunities on the schools' cross-country team. I thought Drew was nice at first, but  
72 not like any of the coaches or teachers that I've had any experience with. They were kind of awkward.



73 Drew didn't really seem present and seemed really nervous, like their mind was on something else the  
74 whole time. Donaldson seemed surprised at my lack of participation on the high school cross country  
75 team. Donaldson was not sure I would get a scholarship for the team, then said something strange:  
76 "We'll have to see how much money the program has." I thought that was strange. Anyway, it was cool  
77 to see the campus and after speaking with the coach, I did decide that even if I was not awarded a  
78 scholarship and a place on the team, I would try out as a walk on for the cross-country team. I thought it  
79 would be a good way to meet some new friends and maybe I would find someone who would want to  
80 do some trail running with me. I guess it wasn't really a surprise that I didn't make the cut for the team  
81 when I tried out. I also didn't really try that hard either. I was recovering from COVID, so I was kind of  
82 out of shape.

83                   Three weeks later, I got my acceptance letter! I couldn't believe it. But the joy I  
84 had experienced didn't last long. Shortly after that my parent was accused of buying my admission, and  
85 my family and everything I worked for was wrapped up in this scandal. I lost a ton of followers on my  
86 social media and everyone at school started to look at me differently. People would make fun of me and  
87 some were really upset. A bunch of my sponsors pulled out as well. But I would never have done  
88 something like this. It cost me my online brand that I had painstakingly built. It's really embarrassing that  
89 people think my parents bribed my way into college, especially because I worked so hard to get in on my  
90 own. I know my parents. They've always told me that no matter what else happened, if I told the truth  
91 then I would be successful. My parents instilled in me throughout my life the need to be honest and  
92 ethical in all my dealings with others. If I did that and worked hard, success would come just as it had to  
93 each of them. The more I think about it, the more I am convinced that Gibbler is just trying to make my  
94 parents take the fall for Gibbler's actions. Also, I reviewed my college application and it is not the one I  
95 drafted with Gibbler. I should have known better than to give it to Gibbler to submit. The idea that I had  
96 Native American heritage is absurd. I trust my parents and they would have not approved an



1 **AVERY GLADSTONE – EXPERT WITNESS STATEMENT – DEFENSE**

2 My name is Avery Gladstone. I am a college admissions counselor in Denver,  
3 Colorado, and a member of the National Association for College Admissions Counseling. I have an  
4 undergraduate degree from the University of California, but I've been here in Colorado for more most of  
5 my adult life. As you can tell from my CV, which is exhibit 6, I have worked in the admissions counseling  
6 field for 19 years. In that role, I have counseled hundreds of kids and families through the thicket of  
7 college admissions. I got into this job because I was the first person in my family to go to college. Back  
8 when I was applying, I had no idea how to navigate the admissions process—and neither did anyone  
9 around me. There was a lot to learn, and when I got to the other side of applying to college, I knew that I  
10 wanted to make that process easier on other kids and families. Unfortunately, a lot has changed in the  
11 world of elite American universities in the more than two decades since I graduated, and none of it for  
12 the better. But more on that later.

13 I was asked by the defense in this case to answer several questions. First: what is  
14 the college admissions process in the United States like today? Second: what is the role of admissions  
15 counselors in that process? And third: Is it possible that Cameron Katsopolis was admitted to the College  
16 of Colorado on merit? In approaching these questions in this case, I applied the same methodology and  
17 rigor that I would if one of my own clients had asked me. I relied on my background and nearly two  
18 decades of experience in this field. I also relied on my review of relevant materials, including publicly  
19 available data on the College of Colorado's admissions practices, along with average ACT/SAT scores,  
20 GPA information, and other statistics regarding the College's incoming class of admitted students;  
21 Cameron Katsopolis' high school grades, high school transcripts, extracurricular activities, and the  
22 information provided to me about Cameron's ACT scores and learning disability. That includes exhibits 2,  
23 3, 7 and 12. My review also included information about the scandal at issue here, and information  
24 provided by both the FBI and the prosecution in this case.

25                               So, let's start with what you need to know about what it's like today to try and  
26 get into an elite American university. Bottom line: it's terrible. The system has been broken for a while  
27 and it keeps getting worse. You should start by understanding that the quality of the education a kid can  
28 get at an "elite" university isn't actually much better (if it's better at all) than the quality of education  
29 they can get anywhere else. If your goal is to go to school and learn something about literature or history  
30 or math or engineering, you can go to any of the universities in our fine state and get just about the  
31 same substantive education on either of those topics. I know it's hard to believe, but it's true.

32                               So why do people vie for the limited number of spots at the College of Colorado  
33 (theso-called "Yale of the Rockies")? There's really one answer to that question: prestige. And in my  
34 view, that is mostly the fault of *U.S. News and World Report*. US News started ranking colleges back in  
35 1983, and their rankings were based on just one criterion. That criterion was ... you guessed it. Prestige.  
36 And how do you build up the prestige of a school? By convincing more and more people to apply for the  
37 same number of spots, thereby driving down the acceptance rate. I'm not here to tell you that prestige  
38 doesn't matter. For some "elite" careers and "elite" graduate programs, it matters a whole lot. But what  
39 I *am* telling you is that the only reason it matters is because we've all decided to buy into the idea that  
40 how selective your college was, how many people they turned down before letting you in, is somehow  
41 an indication of how good an education you got. And that is just nuts.

42                               Here's what that means for kids and for families applying to college today. There  
43 are a handful of schools across the United States that kids want to get into, and their parents want them  
44 to go to. Kids want to go there because they believe that where they go to school is going to impact the  
45 options available to them down the road. Parents want their kids to go there for a whole host of  
46 reasons. Some parents care because they want their kid to go to their alma mater. Others care because  
47 they never went to college themselves, and they want to live vicariously through Junior. And for others,  
48 it's all a status symbol. Bottom line: instead of looking at the whole world of colleges, many kids and

49 parents set their sights on the rarified few. They decide that's what their shooting for, and then they  
50 spend four years of high school trying to make that happen. I shouldn't complain about it too much,  
51 since this system is my bread and butter, and it has been for 19 years. But I'm complaining anyways  
52 because the system is broken.

53                   So, what happens? That's where I come in. The parents who can pay for help for  
54 their kids do exactly that. Every parent wants the best for their child, and some parents are in a position  
55 to pay me (or someone like me) tens of thousands of dollars to maximize their chances of getting into  
56 the school of their dreams. The process is often years long. It can start as early as eighth grade. And while  
57 practices vary from one place to another, it typically involves some combination of (1) advice-giving on  
58 high school classes and extracurricular activities (for example, I might advise a client to take more AP  
59 classes or to focus on a "niche" sport); (2) standardized test tutoring, and legitimate accommodations  
60 for tests for those with learning disabilities; and (3) eventually, assistance with applications themselves,  
61 from the content of essays to application strategies like early decision. Many admissions counselors  
62 even advise parents to make donations to schools or programs. I don't personally do that, as I've always  
63 found that a little too sleazy for my taste and I guess we all have to draw the line somewhere.

64                   Now, all these services can easily run families thousands of dollars. You could say  
65 it is a profitable business for me, I guess—or at least it was before someone like Gibbler comes along and  
66 tarnishes the reputation of all of us legitimate admissions counselors. Is it unfair that the privileged can  
67 and do pay for these services, and everyone else is left in the dust? Maybe. But that's the way the world  
68 works. And everything I just described to you is 100% above board.

69                   Now the next question you have to consider is, how does all this relate to the  
70 facts of this case. Well, here are some facts that you should start with. The College of Colorado is one of  
71 those elite institutions I was telling you about earlier. You can see how elite it is on Exhibit 4, which is *US*  
72 *News and World Report's* ranking for the school. Their acceptance rate is about 14%. Admitted students

73 have an average ACT score of 31, and an average GPA of 3.9. They could fill their incoming class twice  
74 over with valedictorians from around the country, and still have to turn some down. With numbers like  
75 that, unless you're willing to cough up \$25 million or more to have a building or something named after  
76 you, legacy doesn't matter much.

77                   Based on my review of the materials in this case, Blake and Cameron Katsopolis  
78 could have been any of the dozens of students and families I work with every year to navigate the college  
79 admissions process. Blake wanted the best for Cameron, just as every parent does. Blake reached out to  
80 a college admissions counselor, one who at the time had a sterling reputation for helping kids navigate  
81 the admissions process. Blake hired Kyler to help them put together the strongest possible admissions  
82 package. And until Kyler went rogue and started changing things without Blake's or Cameron's  
83 knowledge, the services Kyler provided looked exactly like the legitimate coaching services that I or any  
84 other admissions counselor would provide. Those included helping Cameron get ready for the ACT and  
85 advocating for special accommodations given Cameron's known and preexisting learning disability. They  
86 also included identifying extracurriculars of potential interest—here, cross-country—and arranging visits  
87 to a college that was at the top of Cameron's list. While Cameron may not have competed while in high  
88 school, the cross-country team at College of Colorado seemed of interest to Cameron. It was totally  
89 reasonable that Blake believed Gibbler was providing actual admissions counseling and not some side  
90 door scam. Had I been hired by Blake, I would have done those same things. Was Gibbler more expensive  
91 than me? Sure, but that's because (like I said) until the truth came out, Gibbler had a unique reputation  
92 for success. Of course, people with money like Blake want the best for their children. What I would *not*  
93 have done is what Kyler did next: cheating on Cameron's ACT, lying about Cameron's ethnicity,  
94 attempting to bribe an innocent cross-country coach, or pocketing millions in fake donations from clients  
95 around the country. But again, I digress.

96                   My review also shows that Cameron Katsopolis would have been admitted

97 without any of Gibbler’s shenanigans. Cameron had a 3.9 GPA in high school, and that was *before*  
98 adjustment for the AP and honors classes Cameron took. That is *higher* than the average GPA for  
99 students admitted to the College of Colorado. With an ACT score of 34, Cameron was also above average  
100 for the College (average is 31). And while we’re on that topic, I also don’t see any evidence in this case  
101 that Gibbler’s fake proctor actually changed Cameron’s ACT score. Cameron was reportedly routinely  
102 scoring between 33 and 35 on the ACT practice tests—a score that’s exactly in line with Cameron’s actual  
103 ACT score. With numbers like that, it’s clear that Cameron was well above the *average* student admitted  
104 to the College of Colorado. Numbers like that don’t lie. It’s therefore much more likely than not that  
105 Cameron would have been admitted on merit without any of the illegal interference of the prosecution’s  
106 cooperating witnesses. There’s been some mention by the prosecution that Blake Katsopolis’ \$200,000  
107 donation to the cross-country team somehow influenced Cameron’s application. That makes no sense.  
108 The donation was made after Cameron was already admitted. It is a matter of basic logic that for one  
109 thing to cause another, the cause has got to come *before* the effect. Also, Cameron did not even make  
110 the cross-country team.

111                   And while we’re on the topic of sloppy arguments from the prosecution, let me  
112 just say that the approach to this entire scandal has been spurious from the outset. Usually, the way  
113 that fraud works is that the victim ends up worse off than they were before. The colleges that were  
114 supposedly the “victims” of this fraud? They pocketed (and kept) millions of dollars in donations. Not to  
115 mention that the press around all of this just added to their prestige, and you’ll remember I told you  
116 before that that’s part of the root of the problem with American universities. Tyler Gibbler, who is the  
117 admitted “mastermind” of this whole scheme, is still walking around free and has never spent a day  
118 behind bars, while parents who just want the best for their kids get dragged through the mud and  
119 prosecuted criminally. The FBI ought to be ashamed of themselves.

120                   And that’s all about the way the federal government has handled prosecuting

121 cases where they thought they had enough merit to go forward with a prosecution! When the US  
122 attorney's office declines to prosecute a case, that is because the US attorneys' office believes the  
123 prosecution cannot meet its burden of proof. The Pitkin County District Attorney must be truly off their  
124 rocker, prosecuting an innocent parent and dragging someone's name through the mud, all after the  
125 Feds decided there wasn't enough there to prosecute. Makes you ask yourself, why would they bother.  
126 The only thing I can figure is the DA's office needs to drum up some favorable press ahead of the next  
127 election, and I guess they've decided going after an innocent family is the best way to do it. For my work  
128 in this matter, I charge \$500 per hour—the same hourly rate I charge for the admissions counseling  
129 services I provide.

130 I have carefully reviewed this statement. It is true and accurate, and it includes  
131 everything I know of that could be relevant to the events I discussed. I understand that I can and must  
132 update this statement if anything new occurs to me before the trial.

133 By: *Avery Gladstone*

134 Avery Gladstone



## EXHIBIT 1

### **Transcript of Meeting between Kyler Gibbler and Blake Katsopolis Starbucks Coffee Shop - Cooper Street Mall Aspen, Colorado**

Kyler: Hi Blake. How are you doing today?

Blake: Fine. What's this all about? You said you wanted to follow up on your work for Cameron. I already told you I really appreciated all your work for Cameron. You did a great job and earned every penny. Cameron is really excited to go to College of Colorado and even tried out for the cross country team but, as you know, Cameron really wasn't qualified for that.

Kyler: Well about the money you paid me. That's the reason I needed to talk to you.

Blake: What do you mean? I clearly paid you to help Cameron with the ACT test and admission application. The other money as you know was to be donated to help financially strapped, qualified students go to CC. You know I really want everyone who is truly qualified, like Cameron, to go to CC. It was such a great school for me.

Kyler: Well the money. You see that's part of the problem. My company is being audited by the IRS and I'm afraid they are going to discover the real reason you paid me so much money to get Cameron into CC.

Blake: What do you mean? You told me you run a legitimate college admission assistance program. What would the IRS discover?

Kyler: Well, you know. As you said, you paid me to make sure Cameron's ACT scores were near the top. That's why we got Cameron to take the test separately so that we could have our guy, Matt Johnson, proctor Cameron's examination. You knew that Matt was going to make sure Cameron's answers were correct.

Blake: You're nuts. What are you trying to do? I knew nothing of changing answers. Cameron is a smart kid. Are you trying to set me up?

Kyler: Nothing of the sort. We had a deal. You paid me \$1.0 million. I hired Matt and talked to the cross country coach to do the "end around" to get Cameron in on an athletic waiver. Just like I told you I would do. I even paid the cross country coach \$200,000. I changed Cameron's admission application and said Cameron had been on the high school track team and qualified for state. I also added, at your request, that Cameron's great grandmother had Indian heritage blood because you thought that would help even though it wasn't true. You know all this. You read and approved the application after I changed it and before I sent it into CC admissions.

Blake: What is going on here? None of that happened. Are you trying to get me to say something to get you off the hook? I paid you that money for your purported excellent college admission assistance services. Nothing more. You were to donate most of that money to those scholarships. You told me such donations would help get Cameron admitted to CC.

Kyler: Now Blake don't get upset. I am just worried about the audit. You knew only \$75,000 was going to scholarships. The IRS is suspicious of so much money going into my company and my write-offs. I told you that \$1.0 million was chump change. If you wanted to donate a multi-million dollar building that may help - but even then that donation was no guarantee. You said you didn't have that kind of money so you agreed to my million dollar program.

Blake: I really don't like what's going on here. I think you are in trouble and trying to set me up. You had better not try to do that. I have money and will bring you down for making false allegations against me.

Kyler: Blake, don't threaten me. You knew the scheme. You knew you were paying me to use my contacts and my skills to get Cameron into CC. Cameron would never had made it into CC without that and you know it.

Blake: I'm done here. You and your so called audit can go to ..... I'm out of here. [Reporter can hear door slam]

Kyler: Sorry Riley. Blake seemed really suspicious just like we thought.

The recording then ended.

I hereby certified that the foregoing is a true, complete and correct transcription of the recording provided me by Riley Tanner and the FBI.

/s/ J.C. Miller  
T.C. Miller  
Certified Court Reporter

**CERTIFIED TRUE COPY**

*J.C. Miller*

**EXHIBIT 2**

**Pitkin High School  
OFFICIAL HIGH SCHOOL TRANSCRIPT**

STUDENT INFORMATION	SCHOOL INFORMATION
FULL NAME: Cameron C Katsopolis ADDRESS: 123 Snowmass Court Aspen, CO 81611 PHONE NUMBER: 303-888-1234 EMAIL ADDRESS: adventurewithcameron@gmail.com DATE OF BIRTH: 10/20/2005 PARENT/GUARDIAN: Blake and Jesse Katsopolis	NAME: Pitkin High School ADDRESS: 111 High School Road Aspen, CO 81611 PHONE NUMBER: 303-277-3647 EMAIL ADDRESS: pitkinhigh@aspenk12.net

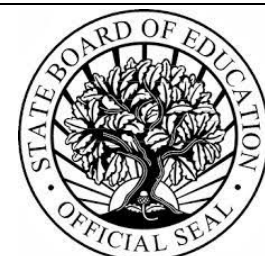
**ACADEMIC RECORD**

SCHOOL YEAR: 2018 - 2019	GRADE LEVEL: 9	SCHOOL YEAR: 2019 - 2020	GRADE LEVEL: 10																																																						
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ACADEMIC SUMMARY	GRADING SCALE	NOTES
Cumulative GPA: 3.93 Credits Earned: 28 Weighted GPA: 4.28 Diploma Earned: yes Graduation Date: 5/18/2022	90 - 100 = A 80 - 89 = B 70 - 79 = C 60 - 69 = D 59 - below = F	* AP courses are taught by highly qualified high school teachers. The AP Examinations are administered each year in May and represent the culmination of college-level work in a given discipline in a secondary school setting. AP classes are more heavily weighted than regular classes and can add 1 point to your GPA.

I do hereby self-certify and affirm that this is the official transcript and record of Cameron C Katsopolis in the academic studies of 2018-2022.

Signature: *Ashley Staab*      Title: Principal      Date: 5/18/2022



# Application for Admission and Scholarships



## Application Form

2022-2023 Academic Year

collegeofcolorado.edu/admissions

Undergraduate Admissions, 1 College Drive, Colorado Springs CO 80829

Email: admissions@cocolorado.edu Telephone: 719.917.1111

**Failure to complete all sections may significantly delay the processing time of your application. Please sign your application and include the \$50 nonrefundable fee. An essay is required if you have been out of school for more than one year. An essay is recommended if you are applying as a freshman.**

### Your Information

Name Katsopolis Cameron C  
Last First Middle Suffix (Jr., III, etc.)

Previous Name (other name under which your transcripts might appear)

n/a

Last First Middle Suffix (Jr., III, etc.)

Preferred Name (Nickname) Cameron

Date of Birth 10 / 20 / 2005  
mm / dd / yyyy

Social Security Number 8 7 6 5 4 3 2 1 0

Please verify the accuracy of your Social Security Number before submitting your application. Entering an inaccurate SSN could cause significant problems with your student record, especially if you intend to apply for need-based financial aid at College of Colorado.

Sex  Male  Female  Other: \_\_\_\_\_  Prefer not to answer

Which type of applicant are you? (If you have not yet graduated high school but have already earned college credit, you are still considered a freshman applicant.)  Freshman Applicant  Transfer Applicant

For freshman applicants, what is your preferred admission plan?  Early Action (Deadline November 15)  Rolling (Deadline February 1)

When do you plan to enroll?  Fall (August 2022)  Spring (January 2023)  Summer I (May 2023)  Summer II (July 2023)

College:  Arts and Sciences  Business  Communication  Education  Engineering and Technology  Fine Arts

Health Sciences and Professions  Honors Tutorial College  International Studies  University College

Please select the college and major to which you are applying. (Please refer to the majors list for options and major codes.)

Undecided

Major

ND0410

Major Code

What is your country of citizenship? United States of America

Do you have a current immigration status?  Yes  No

If yes, what is your current immigration status?  Asylee  Temporary Protective Status  Refugee Deferred Action for Childhood Arrivals

Undocumented  Permanent Resident  Other \_\_\_\_\_

Are you an international student?  Yes  No If yes, please complete the International Application for Admission and Scholarships. DO NOT COMPLETE THIS FORM.

Are you a Colorado Resident?  Yes  No Since what date have you been an Colorado resident? 10 / 20 / 2005  
mm / dd / yyyy

What is your country of residence? United States of America

Where were you born? Aspen Colorado USA  
City State Country

### Permanent Address

123 Snowmass Court Aspen Colorado  
Street Address Apartment# City State/Province  
81611 Pitkin USA 5 / 21 / 2018  
Zip/Postal Code County Country Address Valid Since mm/dd/yyyy

### Mailing Address

123 Snowmass Court Aspen Colorado  
Street Address Apartment# City State/Province  
81611 Pitkin USA 5 / 21 / 2018  
Zip/Postal Code County Country Address Valid Since mm/dd/yyyy

Home Phone (303)888-1234 Cell Phone (303)030-3333  
(Area Code) Phone Number (Area Code) Phone Number

**Permission to text:**  Yes, I give College of Colorado permission to send me important updates and information about my application status. Contact methods may include text messaging and phone calls generated from an automated dialing system.

E-mail Address adventurewithcameron@gmail.com

### Ethnic Background

This information is optional and will not be used for discriminatory purposes.

Hispanic or LatinX  Middle Eastern or North African  Native Hawaiian or Other Pacific Islander  White  
 American Indian or Alaskan Native  Asian  Black or African American  Two or more  Other

### Military Status

College of Colorado is a designated Military Friendly® School. Responses to these questions may be used in communicating additional information to you about the Veterans and Military Student Services Center and other campus resources including advising, support, and financial services.

Are you currently serving on active duty in the U.S. Armed Forces for purposes other than training?  Yes  No

Are you a veteran of the U.S. Armed Forces?  Yes  No

For purposes of the following questions, a veteran is defined as an individual who (1) has engaged in active duty in the U.S. Armed Forces (Army, Navy, Air Force, Marines, or Coast Guard) or is a National Guard or Reserve enlistee who was called to active duty for other than state or training purposes, or was a cadet or midshipman at one of the service academies, and (2) was released under a condition other than dishonorable. Also answer "Yes" if these conditions do not apply now but will apply by June 30, 2022. An individual should answer "No" if they (1) have never engaged in active duty in the U.S. Armed Forces, (2) is currently an ROTC student or cadet or midshipman at a service academy, (3) is a national Guard or Reserve enlistee activated only for state or training purposes, or (4) was engaged in active duty in the U.S. Armed Forces but released under dishonorable conditions.

Are you a member of the National Guard or the U.S. Armed Forces reserve?  Yes  No

Would your family like to receive information about Veterans Affairs educational benefits and services available through the College of Colorado Veterans and Military Student Services Center?  Yes  No

### Emergency Contact Information

Name Katsopolis Blake  
Last First

Address 123 Snowmass Court  
Street Address Apartment#  
Aspen Colorado 81611  
City State/Province Zip/Postal Code  
Pitkin  
County Country (if not U.S.)

Phone Number (303)888-1234 Phone Type  Home  Work  Cell

Relationship parent Email bkatsopolis@aspenstates.org

## Family Information

Would you like to receive more information about resources available to students who are or have been in foster care?  Yes  No

### Parent/Guardian 1

Highest level of school this parent or guardian has **completed**

Less than HS Graduate  HS Graduate or Equivalent  Some College  Technical School  2-Year College Degree  Bachelor's Level Degree  
 Some Graduate School  Master's Level Degree  Doctorate (Academic)  Doctorate (Professional)  Post-Doctorate

Did this parent or guardian graduate from College of Colorado?  Yes  No Graduation Year 1992  
YYYY

Is this parent or guardian an employee of College of Colorado?  Yes  No

Name Katsopolis Blake  
Last First

E-mail Address bkatsopolis@aspenstates.org

Phone Number (303)888-1234 Phone Type  Home  Work  Cell

### Parent/Guardian 2

Highest level of school this parent or guardian has **completed**

Less than HS Graduate  HS Graduate or Equivalent  Some College  Technical School  2-Year College Degree  Bachelor's Level Degree  
 Some Graduate School  Master's Level Degree  Doctorate (Academic)  Doctorate (Professional)  Post-Doctorate

Did this parent or guardian graduate from College of Colorado?  Yes  No Graduation Year 1992  
YYYY

Is this parent or guardian an employee of College of Colorado?  Yes  No

Name Katsopolis Jesse  
Last First

E-mail Address jesse.katsopolis@gmail.com

Phone Number (303)888-1234 Phone Type  Home  Work  Cell

Do you have family members who have attended, or are currently attending, College of Colorado?  Yes  No

Name Katsopolis Blake  
Last First

Relationship Parent Graduation Year 1992  
YYYY

Name Katsopolis Jesse  
Last First

Relationship Parent Graduation Year 1992  
YYYY

Name \_\_\_\_\_  
Last First

Relationship \_\_\_\_\_ Graduation Year \_\_\_\_\_  
YYYY

## Your Education

---

Current High School

High School Type  Public  Private  Homeschool

Name Pitkin High School

---

Aspen

Colorado

81611

City

State/Province

Zip Code

---

Graduation Date 5 / 18 / 2022  
mm / dd / yyyy

GED?  Yes  No  / /  
mm / dd / yyyy

State \_\_\_\_\_

---

## College Coursework

---

Have you ever taken College of Colorado coursework (regardless of location or level)?

Yes  No

Have you attended any other colleges or universities?

Yes  No

## Extracurricular Activities (Optional)

---

Please list any extracurricular activities that you participate in. Reporting activities can help colleges better understand your life outside of the classroom.

Completed 30+ hours of community service

---

Honor Roll Student (4 years)

---

Cross-country team participant and State competition qualifier

---

Social Media Influencer

---

Signature *Cameron Katsopolis*

Date 11 / 2 / 2021

---

I understand that I am responsible for submitting complete and accurate information on my application form and in all related application materials. I certify that the information contained in this application form and in all application materials is complete and accurate, and I understand that submission of inaccurate information by me or at my direction may be sufficient cause for terminating my enrollment. I understand that I am required to notify Undergraduate Admissions if any of the information provided on this application for admission changes after submission. College of Colorado reserves the right to alter terms of admission, up to and including revocation of the admission offer, if necessary.

College of Colorado Notice of Nondiscrimination: College of Colorado, an equal access/equal opportunity affirmative action institution, does not discriminate against any person in educational or employment opportunities because of race, color, religion, age, national ancestry, ethnicity, national origin, sex, pregnancy, sexual orientation, gender identity or expression, military service or veteran status, mental or physical disability, or genetic information. Retaliation is also prohibited by University policy. ©2022 College of Colorado. All rights reserved.



# U.S. News & World Report: College Rankings 2022

## College of Colorado Admissions

#12 in National Universities

College of Colorado admissions is most selective with an acceptance rate of 14%. Half the applicants admitted to College of Colorado have an ACT score between 29 and 33. However, one quarter of admitted applicants achieved scores above these ranges and one quarter scored below these ranges. The application deadline is Feb. 1 and the application fee at College of Colorado is \$50.

Admissions officials at College of Colorado consider a student's GPA a very important academic factor with the average GPA of accepted students being 3.9. An applicant's high school class rank, when available, is considered very important and letters of recommendation are considered very important for admissions officials at College of Colorado.

## College of Colorado Admissions Stats

APPLICATION DEADLINE	APPLICATION FEE	ACCEPTANCE RATE
<b>February 1</b>	<b>\$50</b>	<b>14%</b>

---

## College of Colorado Admissions Requirements

Admission Interview	Recommended
Required Standardized Tests	ACT
SAT/ACT Scores Must be Received By	Feb 1
Campus Visit	N/A

## College of Colorado Applications

Application Deadline	Feb 1
Early Decision Deadline	Nov 15
Application Fee	\$50
Common Application Accepted	Yes
Deadline for Housing Deposit	N/A

## Entering Class Stats

Selectivity	Most Selective
Acceptance Rate	14%
Early Decision Acceptance Rate	N/A



# EXHIBIT 5

**RILEY TANNER**

Denver, Colorado  
Office: 303-629-7171  
[tannerj@denver.fbi.gov](mailto:tannerj@denver.fbi.gov)

## Aptitudes:

Secure Transactions  
Money Crimes  
Forensic Training  
General Public Information  
Financial System Maintenance  
Surveillance Operations  
Cadets  
Brigade Commander  
Community Goals  
Operations Orders  
Bank Fraud  
Clandestine Wire Transfers  
White Collar Crimes  
Financial Fraud

## Employment History

### **Special Agent; 2018 - Present**

Federal Bureau of Investigation, Denver, CO and Kansas City field offices

- Assist local law enforcement personnel in financial and securities fraud investigation and suppression.
- Examine possible fraudulent insurance, money laundering, and securities/investment/“Ponzi” claims and associated criminal activity throughout entire states of Colorado and Wyoming, Western District of Missouri and the entire state of Kansas.
- Facilitated the training of 72 Law Enforcement Officers in various digital forensic tools and techniques in FY 2022.
- Conduct law enforcement records check on individuals.
- Supervised all domestic terrorism investigations and source reporting within District of Missouri.

### **Sheriff Deputy I/Patrol Officer/Detective 2002- 2017**

El Paso County Sheriff/Colorado Springs PD, Colorado Springs, CO

- Governor’s “Dedication to Justice” award recipient.
- Served in joint law enforcement division paroling unincorporated and muni incidents.
- Developed and implemented emergency procedures for securing crime scenes and victim/witness interviews on-scene.
- Developed creative solutions to increase effectiveness of gaming crime and financial theft investigations, including coding Financial Crime Security web portal and program inventory.

### **Premises Surveillance and Property Retention**

#### **Officer (Part-Time); 1996- 2002**

Circle T Convenience, Inc., Woodland Park, CO

- Patrolled convenience store and automobile fueling premises for security and property threats.
- Developed and implemented CI/risk mngmt program for convenience store operations.
- Served as Trainer for new security team members.

---

**Education****Cadet/Deputy Academy, 2003**

Colo State Law Enforcement Training Academy, Golden, CO  
- Electronic Crimes discipline  
- CBI small business investigations liaison

**Bachelor of Arts degree - Kinesiology; 2002**

College of Colorado, Colorado Springs, CO  
- Women's Studies minor  
- President's Scholarship honoree

**Associate degree – History; 1996**

Adams State University, Alamosa, CO

---

**Publications**

*Peterson Market Guide for Electronic Fraud Detection; 2022,*  
co-author (Khann, Yonnsün, Tanner); PETERSON Inc.

*Forensic Accounting and Wire Collar Fraud Examination; No.*  
Dakota Univ. Press; 2 ed (April 15, 2018).

*PDQs and XYZs of Fraud Detection Accounting: Applying  
Kinesiology Perspectives to Advance Financial Fraud  
Investigations,* Whaquney; 1st ed. (September 13, 2014).

## EXHIBIT 6

### Avery Gladstone

Highlands Ranch, CO 80129

Home: 303-791-0020 | Cell: 303-471-5471

[agladstone@go2college.com](mailto:agladstone@go2college.com)

#### Professional Summary

Passionate and well-qualified private College Admissions Counselor with nearly twenty years of student advising experience. Committed to educating and supporting students and their families throughout the transition from high school to higher education. Excels in coaching students to consider realistic and financially feasible college goals. Adept at coaching students through the higher education admissions process from writing effective application essays to test preparation, academic success, and entrance interviewing skills.

#### Core Qualifications

- College and career counseling for students and parents of students
- Member National Association for College Admissions Counseling; Region 11 Chair 2011-2014
- Facilitation of exciting college and career workshops
- Professional development training for teenagers
- Passionate about financial feasibility and college affordability
- Strong writing and editing skills
- Public speaking
- Excellent academic background

#### Experience

##### College Admissions and Scholastic Advisor

6/1/2014 – current

**Gladstone Academics LLC, Glendale, Colorado**

- Serve as a privately retained College Admissions and financial assistance counselor for high-achieving high school students seeking admission to elite American universities.
- Coordinate drop-in college admissions sessions for students and families seeking alignment for merit-based scholarships and admission interview guidance for top tier academic institutions.
- Maintain a 92% success rate in successful and affordable college admission for program participants since 2018; consistently placing participants at one of their top three schools.

##### College Admissions Consultant

7/1/2011 – 5/1/2014

**Quad Educationalists, Buffalo, New York**

- Served as a licensed private College Admissions Counselor for a caseload of 130 middle and high school students throughout their preparation and search for an affordable higher education path.
- Coached students in pre-college and college admissions planning, including locating academic tutors, extra-curricular advising, social media profiling, and early identification of scholarships and grants to attend highly ranked universities and colleges.
- Achieved successful placement and admissions of students at top tier institutions 7.1x greater than schools' published acceptance rates during the 2013-2014 academic year. Over 73% of clients were admitted to their top-choice schools.

**College Admissions Coordinator and Career Counselor**  
**10/1/03– 6/1/2011**

**Colorado Early Technical College, Eads, Colorado**

- As an in-house licensed College Admissions Counselor, implemented new series of college application workshop sessions for students with topics ranging from writing effective application essays to finding the right college or trade program fit.
- Organized monthly college and career panels for participants to learn more about college-university life and planning for a long-term career after college or trade school graduation.
- Designed a new financial feasibility and higher education affordability initiative within the program offering drop-in sessions for students and families within the program to review and analyze complicated financial aid award letters.

**Education**

**Graduate Certificate Student Advising**

**2003**; University of Central Wyoming, Saratoga, Wyoming

**Bachelor of Arts – Psychology Departmental**

**2001**; University of California, Irvine, California

**Honors and Publications**

*Navigating Admission: From College Apps to Admission Letters, Step by Step*; Spring 2022 conference presentation, National Association for College Admissions Counseling

*Higher Ed Hacks: Crushing College Admissions Essays*, June 2020; Vol. 41, Issue 17; Young Forbes Mag.

*College Prep Tips as You Pursue College*, May 2018; [ScholastiWise.com](http://ScholastiWise.com)

Oak Grove Academy (Perris, CA) National Honors Society Member, 1999

**MeterMasters USA****Official Colorado 2021 Race Times for Cameron Katsopolis**

Date	Meet	Location	Event	Official Time
1/31	Colorado 14 Meet	Englewood, CO	5K	21:02.8
4/20	Carbon Springs Meet	Longmont, CO	10K	43:43.02
6/23	Southwestern Showdown	Alamosa, CO	5K	19:90.02 <b>PR</b>
8/2	Copper Cauldron	Copper Mountain, CO	10K	40:54.07 <b>PR</b>

EXHIBIT 8

ADVENTUREWITHCAMERON



Posts



**adventurewithcameron**

College of Colorado



4,101 likes

**adventurewithcameron** Let the new adventure begin!  
Can't wait to attend College of Colorado in the fall. Special thank you to my College Admission Counsler, Kyle Gibbler, for all of your support!

[View all 50 comments](#)

January 16, 2022



# DEDICATION TO JUSTICE AWARD

IN RECOGNITION OF

# RILEY TANNER

For your high standards and continuing excellence in serving & protecting, and to the outstanding contributions you give every day to the entire community.

NOVEMBER 18, 2007

Your impact will live forever in our hearts and minds.

*Denise Frazer*

Denise Frazer, Chief of Police



*Steve Hale*

Steve Hale, Deputy Chief

EXHIBIT 10



6/26/2010

Detective Riley Tanner

4245 Clover Drive, Colorado Springs, CO, 80903

Dear Det. Tanner,

As we discussed today, this is to notify you that you are being placed on administrative leave effective immediately in accordance with the Colorado Springs Police Department.

This administrative leave is to allow the department time to review the following allegation(s) of refusing to stop pursuing a closed investigation.

This investigation will be conducted in a thorough manner and will be kept as confidential as possible. As a reminder, CSPD maintains an anti-retaliation policy that all employees are expected to adhere to.

As part of our investigation, we will be scheduling a meeting with you in order to discuss this matter. Please call or email me with your current contact information so that we may contact you to schedule this meeting.

If you have any questions related to other work issues or you need to come to the workplace for any reason during the period of administrative leave, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Amy Sreenen". The signature is written in a cursive, flowing style.

Amy Sreenen

Director of Human Resources

303-824-5371



**EXHIBIT 11**



717 Mountain Lane  
Aspen, CO 81611  
info@mtnbank.com

**STATEMENT OF ACCOUNT**

Business Account

CUSTOMER NAME <b>Support Your College Athlete Program</b>
ADDRESS 5890 Green Lane Aspen, CO 81611

BRANCH NAME Aspen
CARD NUMBER 4321-9876-1234-6789
ACCOUNT NUMBER 1234567890
PERIOD 10/01/2020 – 11/01/2020

OPENING BALANCE	TOTAL CREDIT	TOTAL DEBIT	CLOSING BALANCE
\$1,500,000	\$1,250,000	\$2,000,000	\$2,250,000

DATE	REFERENCE	TRANSACTION DESCRIPTION	DEBIT	CREDIT	BALANCE
10/02/2020	3046872	Deposit		\$1,000,000	\$2,500,000
10/05/2020	3046873	Donation – University of Pueblo	\$100,000		\$2,400,000
10/05/2020	3046874	Donation – College of Denver	\$50,000		\$2,350,000
10/09/2020	3046875	Deposit		\$500,000	\$2,850,000
10/11/2020	3046876	Donation – College of Denver	\$200,000		\$2,650,000
10/15/2020	3046877	Donation – University of Pueblo	\$250,000		\$2,400,000
10/16/2020	3046878	Donation – Fort Collins College	\$500,000		\$1,900,000
10/22/2020	3046879	Deposit		\$500,000	\$2,400,000
10/25/2020	3046880	Donation – Glenwood University	\$100,000		\$2,300,000
10/28/2020	3046881	Donation – Ouray College	\$50,000		\$2,250,000

<b>TOTAL</b>			\$1,250,000	\$2,000,000	\$2,250,000
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**Pitkin County School District**

SECTION 504 ELIGIBILITY DETERMINATION REPORT	
<b>Student Name:</b> Cameron Katsopolis	<b>Student ID:</b> 1922001
<b>School/Grade:</b> Pitkin High School	<b>Date of Birth:</b> 10/20/2005
<b>Parent/Guardian(s) Name(s):</b> Blake Katsopolis Jesse Katsopolis	<b>Home Phone:</b> <b>Guardian 1:</b> (303) 888-1234 <b>Guardian 2:</b> (303) 888-1234
<b>Meeting Date:</b>  <input type="checkbox"/> <b>Reevaluation (Every 3 years)</b> <input type="checkbox"/> <b>Initial</b> <input checked="" type="checkbox"/> <b>Review (Annually)</b> <input type="checkbox"/> <b>Other:</b>	<b>Referred By:</b> Danny Richardson  <b>Relationship to Student/Position:</b> Pitkin High School Counselor

MEETING PARTICIPANTS	
Name and Title	Signature
Blake Katsopolis, Parent	<i>Blake Katsopolis</i>
Sarah Creed, Counselor	<i>Sarah Creed</i>
James Smith, Teacher	<i>James Smith</i>

I have received my Section 504 Parents Rights BlakeKatsopolis

Parent/Guardian signature

**PART A: SUMMARY OF EVALUATION DATA**

Describe the evaluation data collected including, as relevant, formal testing results, aptitude and achievement data, behavioral observations, disciplinary referrals, classroom performance indicators, teacher recommendations and anecdotal information, health history, current health information, and outside professional opinions, including any medical opinions provided by

parents.

Cameron was diagnosed in February 2014 with ADHD through the Special Education Program at Pitkin Elementary.

## PART B: DETERMINATION OF WHETHER THE STUDENT HAS A DISABILITY UNDER SECTION 504

1. Does the student have a physical or mental impairment?

YES

**If yes,** identify the impairment and provide information supporting the existence of the impairment such as the diagnosis or specific indicators of the impairment.

ADHD

2. Does the physical or mental impairment substantially limit one or more major life activities?

YES

**If yes,** then the student has a disability under Section 504.

Please identify the major life activity/activities that is/are impacted by the impairment:

- |                                   |  |   |   |
|-----------------------------------|--|---|---|
| <input type="checkbox"/> Walking  | <input type="checkbox"/> Hearing             | <input type="checkbox"/> Performing Manual Tasks  | <input type="checkbox"/> Communicating            |
| <input type="checkbox"/> Standing | <input type="checkbox"/> Speaking            | <input type="checkbox"/> Eating                   | <input type="checkbox"/> Caring for Oneself       |
| <input type="checkbox"/> Lifting  | <input type="checkbox"/> Breathing           | <input type="checkbox"/> Sleeping                 | <input checked="" type="checkbox"/> Concentrating |
| <input type="checkbox"/> Bending  | <input type="checkbox"/> Working             | <input type="checkbox"/> The functioning of _____ | <input type="checkbox"/> Seeing                   |
| <input type="checkbox"/> Thinking | <input checked="" type="checkbox"/> Learning | (identify major bodily function)                  | <input type="checkbox"/> Other: _____             |

Briefly describe the reason for and data supporting the decision:

Cameron misses out on a lot of learning opportunities because of difficulty focusing and being fully engaged in the classroom.

3. Does the student need related aids or services, or other accommodations, to access the programs and services of the school district as adequately as their non-disabled peers?

YES

Briefly explain the reason for this decision:

Cameron's ADHD impact their ability to access the curriculum.

*If Questions 1-3 were all answered "Yes," the student is eligible for a Section 504 Plan, and Part C of this form should be filled out.*

### PART C: SECTION 504 ACCOMMODATION PLAN

**Student Name:** Cameron Katsopolis

**Effective Date:** 2/16/2014

**Disability Identified:**  
ADHD

**Case Manager Assigned:**  
Sarah Creed

Please specify the student's needs related to the identified disability, and the accommodations, including related aids and services that the student requires in order to access school programming and activities as adequately as non-disabled students.

**Need: SETTING / ENVIRONMENTAL**

Accommodation: Cameron will be offered preferential seating at the front of the class. Cameron can request a testing environment away from distractions and will be given extra time as requested.

**Need: TIMING / SCHEDULING**

Accommodation: If needed, Cameron will receive extra time on projects. They must communicate with their teacher before the due date, demonstrate progress, and agree upon the extended due date.

Cameron will receive extended time on assessments and be responsible for communicating this need to their teachers.

**Need: RESPONSE**

Accommodation: Cameron's teachers will take care not to draw attention to their disability in front of other students, and will speak with Cameron privately when discussing accommodations.

(Attach additional pages describing needs and corresponding accommodations, as necessary.)

**\*\*A copy of this plan should be provided to all individuals responsible for implementation.**

### PART D: DURATION OF PLAN

Duration of current Section 504 Plan: from (date): 2/16/2022 to (date): 2/16/2023

Review Year: 2021

Review Year: 2022

Reassessment Year: N/A

Initial Plan Date: 2/16/2014

### PART E: PRIOR WRITTEN NOTICE

***The District's conclusion as to your child's eligibility determination is reflected in Part B.2. of this form.***

***The placement the District offers students is reflected in Part C of this form. During the development of the plan outlined in Part C, the Section 504 team meeting provided a forum for participants to propose and consider alternative related aids and services, accommodations, and/or educational settings for Student's placement. If one or more of the proposals you suggested were not adopted by the Section 504 Team, the following list provides the rationale supporting the 504 Team's decisions. If any of your unadopted proposals is not reflected here, please contact the Student's case manager.***

***Nothing else considered at this time***

1. Proposal: \_\_\_\_\_

Data related to proposal: \_\_\_\_\_

Not adopted by 504 Team for the following reason(s): \_\_\_\_\_

2. Proposal: \_\_\_\_\_

Data related to proposal: \_\_\_\_\_

Not adopted by 504 Team for the following reason(s): \_\_\_\_\_

3. Proposal: \_\_\_\_\_

Data related to proposal: \_\_\_\_\_

Not adopted by 504 Team for the following reason(s): \_\_\_\_\_

**For District Use:**

File the original 504 Eligibility Determination Report in the student's 504 file.

Provide/send a copy of the report to the student's parent/guardian.

Provide copies of the Section 504 Plan (Part C) to administrators, teachers, and any other District staff responsible for implementation.

ACT Test Answer Sheet

Marking Directions: Mark only one oval for each question. Fill in response completely. Erase errors cleanly without smudging.

Correct mark: ○●○○○

Do NOT use these incorrect or bad marks.

- Incorrect marks: ○●○●○●
- Overlapping mark: ○●○●○●
- Cross-out mark: ○●○●○●
- Smudged erasure: ○●○●○●
- Mark is too light: ○●○●○●

NAME: Cameron Katsopolis

DATE: 9-11-21

FORM CODE: 060059

TEST 1

- |            |            |            |            |            |            |
|------------|------------|------------|------------|------------|------------|
| 1 A B C D  | 14 A B C D | 27 A B C D | 40 A B C D | 53 A B C D | 66 A B C D |
| 2 B C D E  | 15 A B C D | 28 F G H J | 41 A B C D | 54 F G H J | 67 A B C D |
| 3 A B C D  | 16 A B C D | 29 A B C D | 42 F G H J | 55 A B C D | 68 F G H J |
| 4 F G H J  | 17 A B C D | 30 F G H J | 43 A B C D | 56 F G H J | 69 A B C D |
| 5 A B C D  | 18 F G H J | 31 A B C D | 44 A B C D | 57 A B C D | 70 F G H J |
| 6 F G H J  | 19 A B C D | 32 A B C D | 45 A B C D | 58 F G H J | 71 A B C D |
| 7 A B C D  | 20 F G H J | 33 A B C D | 46 A B C D | 59 A B C D | 72 F G H J |
| 8 F G H J  | 21 A B C D | 34 A B C D | 47 A B C D | 60 F G H J | 73 A B C D |
| 9 A B C D  | 22 F G H J | 35 A B C D | 48 F G H J | 61 A B C D | 74 F G H J |
| 10 F G H J | 23 A B C D | 36 F G H J | 49 A B C D | 62 F G H J | 75 A B C D |
| 11 A B C D | 24 A B C D | 37 A B C D | 50 A B C D | 63 A B C D |            |
| 12 F G H J | 25 A B C D | 38 F G H J | 51 A B C D | 64 A B C D |            |
| 13 A B C D | 26 F G H J | 39 A B C D | 52 F G H J | 65 A B C D |            |

TEST 2

- |              |              |              |              |              |              |
|--------------|--------------|--------------|--------------|--------------|--------------|
| 1 A B C D E  | 11 A B C D E | 21 A B C D E | 31 A B C D E | 41 A B C D E | 51 A B C D E |
| 2 F G H J K  | 12 F G H J K | 22 F G H J K | 32 F G H J K | 42 F G H J K | 52 F G H J K |
| 3 A B C D E  | 13 A B C D E | 23 A B C D E | 33 A B C D E | 43 A B C D E | 53 A B C D E |
| 4 F G H J K  | 14 F G H J K | 24 F G H J K | 34 F G H J K | 44 F G H J K | 54 F G H J K |
| 5 A B C D E  | 15 A B C D E | 25 A B C D E | 35 A B C D E | 45 A B C D E | 55 A B C D E |
| 6 F G H J K  | 16 F G H J K | 26 F G H J K | 36 F G H J K | 46 F G H J K | 56 F G H J K |
| 7 A B C D E  | 17 A B C D E | 27 A B C D E | 37 A B C D E | 47 A B C D E | 57 A B C D E |
| 8 F G H J K  | 18 F G H J K | 28 F G H J K | 38 F G H J K | 48 F G H J K | 58 F G H J K |
| 9 A B C D E  | 19 A B C D E | 29 A B C D E | 39 A B C D E | 49 A B C D E | 59 A B C D E |
| 10 F G H J K | 20 F G H J K | 30 F G H J K | 40 F G H J K | 50 F G H J K | 60 A B C D E |

TEST 3

- |           |            |            |            |            |            |
|-----------|------------|------------|------------|------------|------------|
| 1 A B C D | 8 F G H J  | 15 A B C D | 22 A B C D | 29 A B C D | 36 F G H J |
| 2 F G H J | 9 A B C D  | 16 F G H J | 23 A B C D | 30 F G H J | 37 A B C D |
| 3 A B C D | 10 F G H J | 17 A B C D | 24 A B C D | 31 A B C D | 38 F G H J |
| 4 F G H J | 11 A B C D | 18 F G H J | 25 A B C D | 32 F G H J | 39 A B C D |
| 5 A B C D | 12 F G H J | 19 A B C D | 26 F G H J | 33 A B C D | 40 A B C D |
| 6 F G H J | 13 A B C D | 20 A B C D | 27 A B C D | 34 F G H J |            |
| 7 A B C D | 14 F G H J | 21 A B C D | 28 F G H J | 35 A B C D |            |

TEST 4

- |           |            |            |            |            |            |
|-----------|------------|------------|------------|------------|------------|
| 1 A B C D | 8 F G H J  | 15 A B C D | 22 F G H J | 29 A B C D | 36 F G H J |
| 2 F G H J | 9 A B C D  | 16 A B C D | 23 A B C D | 30 F G H J | 37 A B C D |
| 3 A B C D | 10 F G H J | 17 A B C D | 24 F G H J | 31 A B C D | 38 F G H J |
| 4 F G H J | 11 A B C D | 18 F G H J | 25 A B C D | 32 F G H J | 39 A B C D |
| 5 A B C D | 12 A B C D | 19 A B C D | 26 F G H J | 33 A B C D | 40 F G H J |
| 6 F G H J | 13 A B C D | 20 F G H J | 27 A B C D | 34 F G H J |            |
| 7 A B C D | 14 F G H J | 21 A B C D | 28 F G H J | 35 A B C D |            |

SCORES with optional Writing

English: \_\_\_\_\_ percentile  
 Writing: \_\_\_\_\_ percentile  
 English/Writing: \_\_\_\_\_ percentile  
 Math: \_\_\_\_\_ percentile  
 Reading: \_\_\_\_\_ percentile  
 Science: \_\_\_\_\_ percentile  
 Composite: \_\_\_\_\_ percentile

SCORES

English: 33 96 percentile  
 Math: 35 99 percentile  
 Reading: 34 97 percentile  
 Science: 35 98 percentile  
 Composite: 34 99 percentile

EXHIBIT 14



1 College Drive  
Colorado Springs, CO 80829

February 18, 2022

Kyler Gibbler  
Support Your College Athletic Programs (SAP)  
5890 Green Lane  
Aspen, Colorado 81611

Dear Kyler Gibbler,

On behalf of the College of Colorado Cross-Country team, I wish to thank you and the Katsopolis family for the \$200,000 donation. Our team will be using this money towards running shoes, uniforms, and travel expenses.

This generosity helps us to continue to provide an outstanding program to our students with the outcome of more competitions and recognition of our program in the future.

Thank you again for thinking of the College of Colorado Cross-Country team!

Sincerely,

*Drew Donaldson*

Drew Donaldson  
Cross-Country Coach  
College of Colorado



9/11/21

Cameron Katsopolis

Nice kid

Good grades / good ACT

H.S. XC team ???

Blake answered most questions  
times OK - not great - may walk on

200K to program !!!