

STATE OF TEXAS §
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COUNTY OF TRAVIS §

AFFIDAVIT OF HEIDI GUELMAN

BEFORE ME, the undersigned Notary Public, this day personally appeared Heidi Gudelman, who being by me duly sworn on her oath, deposed and stated the following:

1. My name is Heidi Gudelman. I am over 18 years of age, I am of sound mind, and I understand the taking of an oath. I have personal knowledge of every statement made in this affidavit, all of which are true and correct.
2. I am the Principal of Lake Pointe Elementary School ("Lake Pointe") in the Lake Travis Independent School District ("LTISD" or "District").
3. I have been an educator for 24 years. I began my career as a high school special education teacher in New Braunfels Independent School District, and also taught elementary school before obtaining my Masters in Guidance and Counseling in 1990. I have worked as an at-risk counselor in Austin Independent School District and as a counselor at three elementary schools in Lake Travis ISD, including Lake Pointe. I became the Principal of Lake Pointe in 2003.
4. I hold the following certifications: Principal Grades Early Childhood - 12; Special Education Counselor Grades Pre-Kindergarten - 12; Counselor Grades Pre-Kindergarten -12 ; Elementary Self-Contained Grades 1-8; Elementary English Grades 1-8; Language and/or Learning Disabled Grades Pre-Kindergarten - 12.
5. Like the other campuses in the District, Lake Pointe uses the V-Soft Raptor System, provided by Raptor Technologies, Inc. ("Raptor System"), to screen visitors to the campus. The Raptor System was first used at Lake Pointe during the 2006-2007 school year, and has been used since then.
6. The Raptor System is used during school hours, from 7:20 to 3:00. The Raptor System is not used for after-school or weekend events. On a day when we expect a large volume of parent visitors, or for certain specific events that we host on campus, we do not use the Raptor System for those visitors whose driver's licenses have already been scanned into the system, because we simply would not be able to get parents in the doors fast enough. The District administration has approved the fact that we do not use the Raptor System on specific days that involve high parent traffic.
7. At Lake Pointe, we conduct student assemblies every morning. All students attend, and all parents are invited. A large number of parents attend these assemblies every week. The assemblies are held in the gymnasium, and visitors coming on campus for the assemblies are permitted to enter the building through a back door that is near the entrance to the gym. Campus staff monitor the door, and campus staff stand in the hallway between the gym and the rest of the campus, and do not permit visitors to enter the other parts of the building. The campus staff member monitoring the hallway tells visitors that, if they wish to

walk into the other parts of the building, they must enter through the front doors and check-in at the front office, or the staff member will escort them to the office.

8. In addition to the weekly assemblies, the campus hosts special events like the Thanksgiving Luncheon and "Breakfast with Dad." During those events, because of the high volume of parent visitors, campus office staff direct parents who have already had their driver's licenses scanned into the Raptor System to sign a hard-copy sign-in sheet, and provide the parents a sticker name tag that says, "Visitor." Those whose driver's licenses have not yet been scanned into the Raptor System must check-in through our normal procedure using the Raptor System.
9. Near the beginning of the 2006-2007 school year, when the Raptor System was first implemented at Lake Pointe, the campus disseminated to all parents an information sheet about the Raptor System and its use on the campus. The information sheet was given to parents in the "Tuesday Folder," a folder that each student has that is sent home every Tuesday with important written information for parents to review. I am the custodian of records for Lake Pointe Elementary School. I am authorized to make this affidavit on behalf of the District. Attached to this affidavit is the information sheet about the Raptor System that was sent home to parents with Lake Pointe students. It is true and correct copy of the original document maintained by the District, and is maintained by the District in the regular course of business.
10. When I notice that a non-employee adult in the Lake Pointe building during the school day, is not wearing a name tag, I approach them, ask them why they are not wearing a name tag, and direct them to the office to sign in and obtain a name tag.
11. For parents who have already scanned their driver's licenses, I do not require that they scan their driver's licenses each time that they come to the campus, because their information is saved in the Raptor System. The parent's name is typed into the Raptor System, and the system generates a sticker name tag, which includes their name and their scanned driver's license photograph. The parent is required to wear the name tag while on campus.
12. I have read Mr. Lovelace's affidavit, and he asserts that his driver's license was scanned into the Raptor System at Lake Pointe. That is accurate. On a day after he had had his license scanned and had gone through the Raptor System sign-in process, Mr. Lovelace came to the campus for a meeting with campus staff, which I attended. He did not enter the building through the front door, and he did not sign-in through the Raptor system. Each and every outside door to the building other than the front doors were locked that day. I noticed during the meeting that Mr. Lovelace was not wearing a name badge, so, I went to the Raptor System to determine if he had properly checked-in. He had not. Later that day, I called Mr. Lovelace's home and left a voicemail for him, instructing him that, when he visited Lake Pointe, he was required to enter through the front door, and he was required to check-in using the Raptor System. Mr. Lovelace did not return my call.

Heidi Gudelman

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SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on this day,
July 30, 2009.

Kathy A. Johnson

Notary Public in and for the
State of Texas

My Commission Expires: 7.8.13

