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DOUGLAS J. MASSON
MATTHEW A. SALSBERY

J. FREDERICK HOFFMAN (1922-2003)
DAVID W. LUHMAN, *Of Counsel*

August 18, 2015

West Lafayette Community School Board of Trustees
1130 N. Salisbury Street
West Lafayette, IN 47906-2447

Re: *West Lafayette Community School Corporation Board Vacancy*

Dear Members of the West Lafayette School Board:

Please accept this letter as my application for the vacant position on the West Lafayette Community School Board of Trustees. As to the minimum qualifications listed in the advertisement of vacancy, I hereby affirm that I am registered to vote in the West Lafayette School district and have resided in the district for more than one year. I do not currently hold lucrative office and meet the requirements set forth in IC 20-26-4 and IC 3-8-1.

The notice of vacancy requested that applicants address certain questions in their cover letters. Those questions and my responses are as follow:

1. Why are you interested in serving on the WLCSC board?

I am interested in serving on the West Lafayette Community School Corporation Board for the general reason that I believe an educated citizenry is the foundation of a strong community and for the more pedestrian reason that I have two children in the West Lafayette Schools. I wish to do my part to ensure that the governance contributing to the strong education my children have received continues into the future. Additionally, as a small business owner and property owner in the University Farm neighborhood, I have a stake in both the continued vitality of our schools and their prudent management.

2. Do you have adequate time to make this commitment?

The short answer is "yes." The longer answer is that, like any involved member of the community, I am busy. Between raising a family, managing a small business, and coaching two soccer teams, there are not many idle hours in my day. However, as the saying goes, busy people get things done. If selected for this position, I would make the time to honor this commitment.

3. What past experiences or qualifications make you feel you would be an asset to the children of West Lafayette?

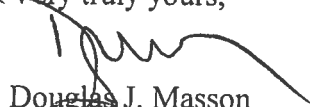
I have served as the Tippecanoe County attorney for many years and, before that, as an attorney in the Legislative Services Agency of the Indiana General Assembly. In those roles, I have gained an understanding of how local government functions and how public policy is implemented. Specific to issues likely to come before the School Board, I have reviewed and negotiated

contracts, drafted resolutions and ordinances, participated in the development of budgets, and provided counsel on a wide variety of personnel issues. My prior work at the Legislative Services Agency mostly involved advising legislators and drafting statutes. Perhaps more relevant to the issue of the school board position, that work led me to start writing "Masson's Blog," a blog I have written since 2004, primarily focused on the Indiana General Assembly. Over the years, I have seen the developments in education policy out of the State House which have led me to believe that traditional public education needs advocates at the local level. My wife, my mother, and my brother have all been school teachers. Consequently, I have an affinity and respect for educators. As the product of public schools from kindergarten through law school, I know what a great education they can provide.

Finally, since 2010, between my son and daughter's GLRSA soccer teams, I have had the privilege of coaching fifteen seasons. In the course of that coaching, I have seen the kids grow and develop, been able to work with their parents, and have hopefully gained insight into some of the various ways in which children learn. Certainly, I have gained an appreciation for how the children and their families contribute to a vibrant and vital West Lafayette.

I enclose my curriculum vitae for your consideration and thank you for your consideration.

Very truly yours,



Douglas J. Masson
DJM

CURRICULUM VITAE
DOUGLAS J. MASSON
(last updated August 18, 2015)

BUSINESS ADDRESS

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EDUCATION

- 1996 Indiana University School of Law J.D. *cum laude*
Bloomington, Indiana
- 1993 Miami University B.A. History and Political Science
Oxford, Ohio

EXPERIENCE

- 2002 - present Partner - Hoffman, Luhman, & Masson, P.C., Lafayette, Indiana: General civil practice. Managing partner since 2014. As one of the county attorneys, I have handled most litigation matters for Tippecanoe County, including without limitation representation of the Sheriff in claims under 42 U.S.C. §1983 and representation of the County in employment matters. Since January 2015, I have served as the primary county attorney and, in that capacity, advise the Commissioners, Council, and other county officials on the wide spectrum of matters addressed by county government.
- 1999 - 2001 Associate - Hoffman, Luhman & Masson, P.C., Lafayette, Indiana: General civil practice with a focus on creditors rights and collections law.
- 1998 - 1999 Deputy Director, Office of Code Revision, Legislative Services Agency of the Indiana General Assembly: Proofed and edited draft legislation for the Indiana General Assembly; drafted the annual technical corrections bill; assisted with production of the Indiana Code and Indiana Register; provided staff support and counsel to the Code Revision Committee.
- 1996 - 1998 Staff Attorney, Office of Bill Drafting and Research, Legislative Services Agency of the Indiana General Assembly: Primarily drafted legislation requested by

legislators and served as staff counsel for the House Transportation Committee, the House Commerce Committee, and the House Public Safety Committee.

ADMISSIONS

November 4, 1996 State Courts of Indiana
 United States District Court for the Northern District of Indiana
 United States District Court for the Southern District of Indiana

March 3, 2003 United States Court of Appeals for the Seventh Circuit

October 18, 2004 United States Supreme Court

May 24, 2012 United States District Court for the District of Arizona, *pro hac vice*

SELECTED CASES

Severson v. Board of Trustees of Purdue University, 777 N.E.2d 1181 (Ind. Ct. App. 2002). (Tippecanoe County Sheriff's Deputy entitled to law enforcement immunity against claim of Purdue residential assistant murdered by student where estate of residential assistant claimed that Sheriff's Deputy had promised protection and was negligent in providing protection.)

Old Romney Development Co. v. Tippecanoe County, 817 N.E.2d 1282 (Ind. Ct. App. 2004) (County entitled to summary judgment on inverse condemnation claim where property still had indirect access to new highway even though direct access was no longer available.)

Browell v. Davidson, 595 F.Supp.2d 907 (N.D. Ind. 2009). (Sheriff's deputies did not violate kidnaping victim's civil rights where they fired shots at fleeing vehicle with victim and kidnaper.)

Olson v. Brown, 594 F.3d 577 (7th Cir. 2010) (Jail inmate's putative class action over mail handling and other matters was not moot even though class was not certified prior to putative class representative's transfer from the jail)

J.M. v. Review Bd. of Indiana Dept. of Workforce Development, 975 N.E.2d (Ind. 2012) (Indiana Supreme Court reversed Indiana Court of Appeals, holding that a "just cause" termination determination could be upheld under alternate rationales supported by the record; not only the rationale selected by the Department of Workforce Development for analysis.)

Findlay v. Lendermon, 2012 WL 5948241 (N.D. Ind. 2012) (Officer entitled to summary judgment on wrongful seizure and wrongful arrest claims where he had probable cause to seize a video camera being operated by the plaintiff and where plaintiff refused to comply with officer's instructions to turn over the camera. Question of fact remained on excessive force claim.)

Findlay v. Lendermon, 722 F.3d 895, (7th Cir. 2013) (Officer entitled to qualified immunity on

plaintiff's excessive force claim where plaintiff failed to cite analogous case law that would put reasonable officer on notice that level of force used was probably unlawful.)

PUBLICATIONS

- December 2012 - May 2014 Indiana Business Journal - Forefront. Semi-monthly column on a variety of Indiana policy issues.
- November 2004 - present Masson's Blog: A Citizen's Guide to Indiana. Focused primarily on the Indiana General Assembly and state case law.
- Fall 1996 *The Genie Let Loose: Ineffectual Encryption Export Restrictions and Their Deleterious Effect on Business*, 2 J. Tech. L. & Pol'y 4 (1996). (Article discussing the ineffective and counterproductive restrictions on exports involving encryption technology.)
- Spring 1996 *Fixation on Fixation: Why Imposing Old Copyright Law on New Technology Will Not Work*, 71 Ind. L. J. 1049 (1996) (Article discussing the inadequacies of copyright law designed for traditional media in dealing with issues unique to electronic media).

COMMUNITY ORGANIZATIONS

- 2005 - 2011 Board of Directors, Legal Aid Corporation of Tippecanoe County. Organization devoted to providing legal services to low income individuals in civil, non-fee generating cases. Served as President of the Board from 2008-2010 and Vice President from 2007-2008. Additionally, I was a member of the annual golf outing fund raiser committee from its inception in 2005 through 2014.
- 2009 - 2012 Board of Directors, Shared Enterprise Management Inc. Non-profit organization that serves as landlord and provides building management for the Howarth Center in Lafayette, Indiana. The Howarth Center provides space for area non-profits on a cooperative model with goals that include creating synergy between those non-profits, providing space at below market rents, and allowing those non-profits to focus on their respective missions rather than on building management.
- 2010 - Present Greater Lafayette Recreational Soccer Alliance. Volunteer coach for two youth soccer teams in Tippecanoe County, Indiana.