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**PREVENT AND PREPARE: Managing risks involved with college security**

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# THE CAMPUS SECURITY duties of the Boards of Trustees for North Carolina’s community colleges

## “The trustees of each institution shall constitute the local administrative board of such institution, with such powers and duties as are provided in this Chapter and as are delegated to it by the State Board of Community Colleges.” N.C. Gen. Stat. § 115D-20 (2016). Powers and duties of trustees.

## North Carolina General Statute *§* 115D specifies many of those powers and duties that may have bearing on safety and security, including employing a chief administrative officer (N.C. Gen. Stat. § 115D-20(1) (2016)) and other personnel (N.C. Gen. Stat. § 115D-20(2) (2016)), purchasing land (N.C. Gen. Stat. § 115D-20(3) (2016)), and leasing equipment and real property (N.C. Gen. Stat. § 115D-20(11)(2016)) and other matters.

## The powers and duties of the board of trustees of a community college do not specify state-mandated safety and security actions but defer to local autonomy "to perform such other acts and do such other things as may be necessary or proper for the exercise of the foregoing specific powers, including the adoption and enforcement of all reasonable rules, regulations, and bylaws for the government and operation of the institution under this Chapter and for the discipline of students.” N.C. Gen. Stat. § 115D-20 (2016).

# RELEVANT EXAMPLES OF CONCERN ON COLLEGE CAMPUSES

## Virginia Polytechnic Institute and State University in Blacksburg Virginia on April 16, 2007: 32 killed, 17 wounded, 6 additional injured, Student perpetrator committed suicide; Total costs $48.2M. *Report: Virginia Tech shootings cost $48.2 million*, Security Magazine, April 13, 2012, at https://www.securitymagazine.com/articles/82975-report--virginia-tech-shootings-cost--48-2-million.

## Wayne Community College in Goldsboro North Carolina on April 13, 2015: 1 employee killed, Former student sentenced to life in prison. Martha Quillin, *Former student convicted of first-degree murder in Wayne Community College shooting*, News And Observer (Raleigh), *at* www.newsobserver.com/news/local/crime/article148390839.html (May 3, 2017).

## Umpqua Community College in Roseburg Oregon on October 1, 2015: 10 killed, 7 wounded, Student perpetrator committed suicide after police engaged him. Elisha Fieldstadt, *Oregon College Shooting: Gunman Chris Harper Mercer died of suicide, Officials say*, *at* https://www.nbcnews.com/storyline/oregon-college-shooting/oregon-college-shooting-gunman-chris-harper-mercer-died-suicide-officials-n438106 (October 3, 2015).

## In 2011, a high school student was stabbed to death in Miami-Dade School District, and the school district settled for negligent security for $1.875 million. The on-duty police officer was in court that day, and the school district made no other arrangement for security. Arthur Buono, *$1.8 Million Settlement for Florida High Shool Slaying*, *at* https://blogs.lawyers.com/2011/11/1-8-million-settlement-for-florida-high-school-slaying/ (November 23, 2011).

# THE LEGAL LANDSCAPE FOR ACCESS TO DEADLY WEAPONS ON COLLEGE CAMPUS

## Federal constitutional backdrop

### Individual right to bear arms

#### The Second Amendment to the United States Constitution: “A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.” U.S. Const. amend. II.

##### The initial phrasing of the Second Amendment, “A well regulated Militia, being necessary to the security of a free State,” is interpreted by the United States Supreme Court as a prefatory clause that “announces a purpose” for the latter operative clause, but “a prefatory clause does not limit or expand the scope of the operative clause.” District of Columbia v. Heller, 554 U.S. 570, at 577- 578 (2008).

##### The operative clause is “the right of the people to keep and bear Arms, shall not be infringed.” Id. at 577- 578.

#### The Supreme Court held that the Second Amendment guarantees “the individual right to possess and carry weapons in case of confrontation.” Id. at 592.

##### D.C. had banned the possession of handguns in the privacy of a home and required the handguns to be rendered inoperable. Id. at 628*.* The Supreme Court’s holding was limited to addressing the ban.

##### In dicta, the majority stated the ruling should have no impact “on longstanding prohibitions on the possession of firearms by felons and the mentally ill, or laws forbidding the carrying of firearms in sensitive places such as schools and government buildings.” Id. at 626. This was not an exhaustive list, and readers should note that the Supreme Court did not define “school” and therefore should not necessarily assume the Court meant to include post-secondary institutions.

#### The Supreme Court held “that the Second Amendment right [to keep and bear arms for the purpose of self-defense] is fully applicable as to the states,” as incorporated through the Fourteenth Amendment in McDonald v. Chicago, 561 U.S. 742 (2010). In that case, the City of Chicago and Village of Oak Park had municipal bans on firearms similar to those held to be unconstitutional in Heller.

#### What is the standard of review for restrictions on individual right to bear arms?

##### The majority in Heller rejected rational basis review. *See,* Heller, 554 US at 628 n 27 and at 634-35.

##### The majority in Heller rejected an interest balancing test. *See*, Heller, 554 US at 634-35.

##### *McDonald* does not speak to which standard is appropriate for review, and the four-justice plurality adds that the “incorporated Bill of Rights portections ‘are all to be enforced against the States under the Fourteenth Amendment according to the same standards that protect those personal rights against federal encroachment.’” McDonald,561 U.S. at 765, quoting Malloy v. Hogan, 378 U.S. 1, at 10-11 (1964).

For consideration by community colleges in North Carolina, the Fourth Circuit Court of Appeals imposed a two pronged inquiry, namely, first, to determine “whether the challenged law imposes a burden on conduct falling within the scope of the Second Amendment’s guarantee,” United States v. Chester, 628 F. 3d 673, 680 (4th Cir. 2010) and “if the challenged regulation does burden conduct within the scope of the Second Amendment as historically understood, the court must apply “an appropriate form of means-end scrutiny.” Id., at 683. This intermediate scrutiny places the burden of justifying government regulation on the government, namely the burden of showing “a reasonable fit between

##### the challenged regulation and a substantial government objective.” Id., at 683.

## Current NORTH CAROLINA legislative approaches

### Concealed Carry laws

#### North Carolina is a common-law state for the open carry of firearms.

##### On September 1, 1842, Anson County resident Robert S. Huntley was beaten and killed by his fellow citizens because they “were terrified, and the peace of the State endangered” by Mr. Huntley being openly armed with a double-barrelled gun, riding on the property of Mr. James H. Ratcliff, and threatening him. State v. Huntley, 25 N.C. (3 Ired.) 418, 419 (1843). Overturning Mr. Ratcliff’s conviction for the murder of Mr. Huntley, the Supreme Court held, in part, “[A]lthough a gun is an ‘unusual weapon,’ it is to be remembered that the carrying of a gun, per se, constitutes no … offence. For any lawful purpose – either of business or amusement – the citizen is at perfect liberty to carry his gun.” Huntley, 25 N.C. (3 Ired.) at 422-423.

##### Following Huntley, however, persons are cautioned not to go armed to the terror of the people. “It is the wicked purpose, and the mischievous result, which essentially constitute the crime. He shall not carry about this or any other weapon of death to terrify and alarm, and in such manner as naturally will terrify and alarm a peaceful people.” Huntley, 25 N.C. (3 Ired.) at 423.

#### North Carolina includes carrying concealed weapons in its criminal law statutes under Article 25 – Offenses Against the Public Peace.

##### It is unlawful to conceal and carry various knives and other deadly weapons except “on the person’s own premises.” N.C. Gen. Stat. § 14-269(a) (2016).

It is unlawful to conceal and carry pistols or guns except “on the person’s own premises;” or if the concealed weapon is a handgun carried by a person who has been lawfully issued a concealed handgun permit and the carrying is within the scope of the permit; or if the person carrying a handgun is a military permittee who can provide proof of deployment to

##### a requesting law enforcement officer. N.C. Gen. Stat. § 14-269(a1)(1), (2), and (3) (2016).

##### Violations of the concealed carry statute for knives or like deadly weapons constitute a Class 2 misdemeanor. Violations of the concealed carry statute for pistols or guns constitute a Class 2 misdemeanor for the first offense and a Class H felony for the second offense. N.C. Gen. Stat. § 14-269(c) (2016).

#### As of May 2017, NC was one of 16 states in which the legislature banned concealed weapons on college and university campuses (National Conference of State Legislators, Guns on Campus: Overview, at http://www.ncsl.org/research/education/guns-on-campus-overview.aspx (May 5, 2017)) but is a state that permits concealed weapons to be stored in a locked vehicle on campus.

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##### The statute for weapons on campus or other educational property covers community colleges, public or private schools, and four-year institutions. N.C. Gen. Stat. § 14-269.2(a)(1b) (2016).

##### The statute for weapons on campus or other educational property covers educational property including “[a]ny school building or bus, school campus, grounds, recreational area, athletic field, or other property owned, used, or operated by any … board of trustees….” N.C. Gen. Stat. § 14-269.2(a)(1) (2016).

##### N.C. Gen. Stat. § 14-269.2 delineates categories of felonies and misdemeanors to possess or carry certain items and also provides for various exceptions to the statutory prohibitions.

##### The most relevant exceptions for purposes of community college campus security are the provisions banning weapons on educational property which “shall not apply to a person who has a concealed handgun permit that is valid … or who is exempt from obtaining a permit …, if any of the following conditions are met:

#### “(1) The person has a handgun in a closed compartment or container within the person's locked vehicle or in a locked container securely affixed to the person's vehicle and only unlocks the vehicle to enter or exit the vehicle while the firearm remains in the closed compartment at all times and immediately locks the vehicle following the entrance or exit.

#### (2) The person has a handgun concealed on the person and the person remains in the locked vehicle and only unlocks the vehicle to allow the entrance or exit of another person.

#### (3) The person is within a locked vehicle and removes the handgun from concealment only for the amount of time reasonably necessary to do either of the following:

#### a. Move the handgun from concealment on the person to a closed compartment or container within the vehicle.

#### b. Move the handgun from within a closed compartment or container within the vehicle to concealment on the person.”

#### N.C. Gen. Stat. § 14-269.2(k)(2016).

##### “[A] person who was authorized to have a concealed handgun in a locked vehicle pursuant to [N.C. Gen. Stat. § 14-269.2] subsection (k) … and removed the handgun from the vehicle only in response to a threatening situation in which deadly force was justified” has an affirmative defense to prosecution. N.C. Gen. Stat. § 14-269.2(l)

###### The use of non-deadly force is justified “when and to the extent that the person reasonably believes that the conduct is necessary to defend himself or herself or another against the other’s imminent use of unlawful force.” N.C. Gen. Stat. § 14-51.3(a)

###### The use of deadly force without “a duty to retreat from a place he or she has the lawful right to be” is justified if a person “reasonably believes that such force is necessary to prevent imminent death or great bodily harm to himself or herself or another.” N.C. Gen. Stat. § 14-51.3(a)(1)

###### The use of deadly force without “a duty to retreat” by “[t]he lawful occupant of a … workplace” building is justified if a person “held a reasonable fear of imminent death or serious bodily harm to himself or herself or another” N.C. Gen. Stat. § 14-51.3(a)(2) (2016) and N.C. Gen. Stat. § 14-51.2 (2016). Refer to local legal counsel for further clarification of N.C. Gen. Stat. § 14-51.2 due to the limited discussion here of the applicable circumstances.

###### If the use of force or deadly force is justified, the person is immune from civil or criminal liability unless that force is used against a law enforcement officer or bail bondsman lawfully performing their duties as described in the statute. .” N.C. Gen. Stat. § 14-51.3(b) (2016).

#### States are divided as to the legality of Campus Carry, the possession on college property of a weapon concealed on a person.

##### The North Carolina General Assembly proposed House Bill 251 and its comparable Senate version, S 204, in the 2017-2018 long session to allow concealed carry on community college property, but the bills were referred to committee in March 2017 and went no further. Neither bill proceeded to a vote in its respective chamber during the 2017 session. *See, e.g.,* https://ncleg.net/gascripts/BillLookUp/BillLookUp.pl?Session=2017&BillID=HB+251&submitButton=Go (providing legislative history for HB 251).

##### Mandatory campus carry is required in Arkansas, Colorado, Georgia Idaho, Kansas, Mississippi, Oregon, Tennessee, Texas, Utah, and Wisconsin. Posting by Adilene Rodriguez, *Current Laws on Guns On Campus in the United States*, (April 2017) *at* <https://www.tun.com/blog/current-laws-on-guns-on-campus-in-the-united-states/> (last visited March 30, 2018.) For example, since August 2016, Texas Senate Bill 11 allows individuals over 21 years with a concealed handgun license to carry concealed firearms at public universities and extended that to their community colleges in April 2017. Colleges can designate gun-free zones but cannot completely prohibit firearms. University of Texas at San Antonio, *Campus Carry. About Texas Senate Bill 11*, (2017) *at* https://www.utsa.edu/campuscarry/aboutsb11.html (last visited March 30, 2018).

##### Twenty-one states allow institutions to decide campus carry. Posting by Adilene Rodriguez, *Current Laws on Guns On Campus in the United States*, (April 2017) *at* <https://www.tun.com/blog/current-laws-on-guns-on-campus-in-the-united-states/> (last visited March 30, 2018.)

##### North Carolina’s current law is an example of nonpermissive campus carry, banning firearms on campuses except in limited circumstances. Twenty states plus the District of Columbia use this model. Posting by Adilene Rodriguez, *Current Laws on Guns On Campus in the United States*, (April 2017) *at* <https://www.tun.com/blog/current-laws-on-guns-on-campus-in-the-united-states/> (last visited March 30, 2018.)

### The North Carolina General Assembly expanded in 2013 the parameters of community-based policing in primary and secondary schools.

#### The chief of police of a local or county police department or the Sheriff of a county may establish volunteer safety resource office programs. N.C. Gen. Stat. § 160A-288.4 (2016) and N.C. Gen. Stat. § 162-26 (2016).

##### Nonsalaried special deputies serving in public schools must have prior experience as a sworn law enforcement officer or a military police officer with a minimum of two years’ service and an honorable discharge if no longer in the armed services. N.C. Gen. Stat. § 160A-288.4(a) (2016) and N.C. Gen. Stat. § 162-26(a) (2016).

##### There are training and medical examination requirements for volunteer school safety resource officers. *N.C. Gen. Stat. §* 160A-288.4(b) and *N.C. Gen. Stat. §* 162-26(b).

#### North Carolina counties have begun to implement these programs.

##### Randolph County. *See*, Justyn Melrose, *Rockingham County armed volunteer officer program gets support from state lawmakers, sheriffs*, *available at* http://www.greensboro.com/rockingham\_now/news/eden\_reidsville/rockingham-county-armed-volunteer-officer-program-gets-support-from-state/article\_8dbd211a-1ccd-11e8-a9c9-2793d6234538.html (February 28, 2018).

##### Rockingham County. *See*, Jessica Mensch, *North Carolina School District moving forward with armed volunteers in schools*, *at* <http://www.abc10.com/article/news/north-carolina-school-district-moving-forward-with-armed-volunteers-in-schools/103-525947155> (March 4, 2018).

##### Stanly County. *See,* Media Release, Office of the Sheriff, Stanly County, on file with the author, and *see*, Liz Foster, *Stanly Co. schools to implement armed volunteer program*, *at* <http://www.wsoctv.com/news/local/stanly-co-schools-to-implement-armed-volunteer-resource-officers/712512038> (March 7, 2018).

But not in the largest public school districts in North Carolina: Forsyth County , Guilford County, Charlotte-Mecklenburg Schools, or Wake County. *See*, T. Keung Hui, *To improve safety, some rural NC school districts look to armed volunteers*, *at*

##### <http://www.charlotteobserver.com/news/local/education/article205996944.html> (March 23, 2018).

##### And not considered possible in Wilkes County due to a lack of training standards. *See*, Jule Hubard, *Volunteer SRO plan ‘not doable’*, *at* <http://www.journalpatriot.com/news/volunteer-sro-plan-not-doable/article_25a4a63c-1e23-11e8-b2aa-a3feeabfee73.html>, (March 2, 2018).

#### The statutory language creating programs to appoint volunteer school safety resource officers does address liability concerns. “There shall be no liability on the part of and no cause of action shall arise against a volunteer school safety resource officer,” the Sheriff or chief of police, sheriff’s employees or employees of the local law enforcement agency who supervise the volunteer SROs, the public school system or its employees “for any good-faith action taken by them in the performance of their duties with regard to the volunteer school safety resource officer program.” N.C. Gen. Stat. § 160A-288.4(d) (2016) and N.C. Gen. Stat. § 162-26(d) (2016).

#### Be aware that the statutory provisions allowing for the creation of volunteer safety resource officer programs do not address whether school boards of education may allow the presence of volunteer school resource officers in Early College or Middle College high schools, and nor do they address chain of command for community college campus security and liability for boards of trustees or employees of community colleges when Early College or Middle College high schools are co-located on educational property owned by community colleges’ trustees.

### School safety is a topic for discussion for the upcoming legislative session of the North Carolina General Assembly.

#### The North Carolina General Assembly appointed a Select Committee for School Safety as a House Select Committee. Marvin Beach, North Carolina House Select Committee on School Safety Created, at http://www.wccbcharlotte.com/2018/02/20/north-carolina-house-select-committee-school-safety-created/ (February 20, 2018) which convened for its first meeting on March 21, 2018. See, https://www.ncleg.net/gascripts/DocumentSites/browseDocSite.asp?nID=385&sFolderName=\3-21-2018 (last accessed March 30, 2018) (agenda and related meeting materials).

#### See, also, Donna King, NC House works on school safety strategy, North State Journal, at https://nsjonline.com/article/2018/03/democrat-lawmakers-propose-restricting-access-to-some-firearms/ (March 20, 2018).

## The Public Health Approach to Violence Prevention

### Define and monitor the problem

#### Is there data for violence of campus in your area? What have your campuses seen? Look to your Clery Act reporting as a first step. Talk to your local law enforcement and first responder organizations.

#### Policy review and development

##### The annual review of safety policies helps to keep up with a shifting legal landscape.

##### Define what is a weapon on your campus. Consider knives and firearms, but also bow hunting implements and explosives such as fireworks.

##### Determine what guidance to offer your employees and students in different situations.

### Identify risk and protective factors

#### Risk factors are characteristics that increase the likelihood of a person becoming a victim or perpetrator of violence. The Centers for Disease Control and Prevention, The Public Health Approach to Violence Prevention, at <https://www.cdc.gov/violenceprevention/overview/publichealthapproach.html> (March 25, 2015).

#### Protective factors are characteristics that decrease the likelihood of a person becoming a victim or perpetrator of violence because providing a buffer against risk. The Centers for Disease Control and Prevention, The Public Health Approach to Violence Prevention, at <https://www.cdc.gov/violenceprevention/overview/publichealthapproach.html> (March 25, 2015).

#### Empanel threat assessment or behavior assessment teams for a cross-functional assessment of alerts regarding students, employees, or the public to assist with identifying and monitoring the problem and the risk and protective factors.

##### Ensure there is outreach following assessment as needed. Risks do not necessarily equate to violence, and protective factors do not always remain protective.

##### Maintain ongoing monitoring as needed. This is often watchful waiting. Involve local law enforcement organizations to assist with monitoring.

###### North Carolina Information Sharing and Analysis Center (ISAAC) within the North Carolina State Bureau of Investigation “is an all-crimes fusion center located in Raleigh” … that “develops actionable intelligence on immediate and emerging threats and shares it with … partners in a timely manner.” North Carolina Information Sharing and Analysis Center (ISAAC) flyer, *available at* <http://www.ncsbi.gov/NCISAAC/NCISAACFCFlyer_2017.aspx> *(last visited March 30, 2018).*

### Develop and test prevention strategies

#### The CDC recommends an evidence-based approach to planning that takes into account what law enforcement literature recommends. The Centers for Disease Control and Prevention, The Public Health Approach to Violence Prevention, at <https://www.cdc.gov/violenceprevention/overview/publichealthapproach.html> (March 25, 2015). Keep in mind the recommendations of your local law enforcement organizations and consider stakeholder focus groups to design prevention programs.

#### Maintain practices for primary intervention for violent behavior by students, employees, and visitors.

#### Adapt the model of management-by-walking-around to daily security maintenance for community-based policing on campus.

#### Provide physical security measures including locks, but also limiting access to side and back doors and providing adequate line-of-sight around campus landscaping.

#### Respond to substance abuse and mental health concerns to minimize risk factors and emphasize protective factors.

### Assure widespread adoptions

#### Apply policy consistently and communicate widely.

#### Provide training for frontline staff, facilities personnel, faculty members including distance learning faculty who may not be physically present at campus locations but whose students may take a mix of distance learning and seated classes, and anyone who encounters students and the visiting public on your campuses. Approach professional development proactively from your human resources staff and faculty subject matter experts but also from campus security/campus police and your local law enforcement partners.

## Liability concerns

### This is not an exhaustive study of potential liability in the setting of campus security. The reader is advised to seek legal counsel to explore these matters further.

### Examples of potential causes of action

#### Negligence (in providing security, in training employees, in managing an incident, in applying your policies and procedures).

#### Community Colleges are not obligated to redress claims of negligence except as sovereign immunity is waived by the North Carolina

#### Tort Claims Act. For a summary assessment of sovereign immunity, or the legal concept that the King or the State can do no wrong, see, Guy Seidman, The Origins of Accountability: Everything I know about the sovereign’s immunity, I learned from King Henry III, 40 St. Louis U. L.J. 393 (2004-2005). Note, this does not abrogate potential liability for willful misconduct by agents of the college.

The North Carolina Industrial Commission decides claims against State agencies, including community colleges, under the North Carolina Tort Claims Act, N.C. Gen. Stat. § 143-291 (2016), to “determine whether or not each individual claim arose as a result of the negligence of any

#### officer, employee, involuntary servant or agent of the sate while acting within the scope of his office, employment, service, agency or authority.” N.C. Gen. Stat. § 143-291 (a) (2016).

#### Keys to determining the success of a claim under the North Carolina Tort Claims Act include whether the employee was acting within the scope of employment; whether negligence was the proximate cause of the injury; and whether there was contributory negligence on the part of the claimant. Note that contributory negligence is a bar to recovery in North Carolina. N.C. Gen. Stat. § 143-299.1 (2016).

#### For successful claims, the community college that employed the negligence employee must pay the first $150,000 ordered as recovery by the Industrial Commission and the balance is paid using estimated lapsed salaried or otherwise as permitted under N.C. Gen. Stat. § 143-299.4 (2016).

#### If community colleges purchase commercial general insurance, then that coverage holds in lieu of the college’s obligation otherwise to pay under the North Carolina Tort Claims Act. N.C . Gen. Stat. § 143-291 (2016).

#### Public Duty Doctrine as a defense

#### Note that for claims of negligent security, a claim may be barred by the public duty doctrine, N.C. Gen. Stat. § 143-299.1A (2016), if a community college employs a “law enforcement officer” within the definition of N.C. Gen. Stat. § 143-299.1A(d) such as one actively serving in a law enforcement and crime prevention role, N.C. Gen. Stat. § 143-299.1A(d)(1) (2016), or as a sworn officer with the power of arrest, N.C. Gen. Stat. § 143-299.1A(d)(2) (2016).

In Wood v. Guilford County, the North Carolina Supreme Court denied a county employee recovery following an assault at the county courthouse because the county provided security services as part of its general police functions, even though the function was provided through the contractual services of a private security detail. Wood v. Guilford County, 558 S.E. 2d 490 (N.C. 2002).

#### Premises liability.

Community colleges should take reasonable care in the provision of campus security. In 1998, the North Carolina Supreme Court adopted a simple approach to liability for landowners in the case of injury to lawful visitors to their property, namely “the duty to exercise reasonable care in the maintenance of their premises for the protection of lawful visitors.” Nelson v. Freeland, 507 S.E. 2d 882, 892 (N.C. 1998)

#### Worker’s compensation

Community college employees may be due recovery under the North Carolina scheme for worker’s compensation for injuries sustained related to campus security incidents. Compensable injuries “must be shown to have resulted from an accident arising out of and in the course of the employment.” Duncan v. City of Charlotte, 66 S.E. 2d 22, 25 (N.C. 1951) (citations omitted). *See also*, N.C. Gen. Stat. § 97-2(b) (2016).

In 2012, the North Carolina Court of Appeals upheld a decision allowing worker’s compensation benefits for James A. Hunt, a middle school principal shot on the way to work, two days after promoting violence prevention at his school. Bryan Mims, *Court upholds workers’ comp award to wounded principal*, WRAL, *at* <http://www.wral.com/court-upholds-workers-comp-award-to-wounded-principal/10940803/> *(April 3, 2012).* *See, also*, the unpublished opinion of the North Carolina Court of Appeals, NO. COA11-1110, *available at* www.ic.nc.gov/ncic/pages/court/w18411.pdf.