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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

| | | |
|-----------------------------------|---|-------------------------|
| LATESHA GONZALEZ, a single woman, |) | NO. 04 2 09023 2 |
| |) | |
| Plaintiff, |) | DECLARATION OF ADRIENNE |
| |) | ROCCO |
| v. |) | |
| |) | |
| KILLEBREW/DALTON, INC., d/b/a as |) | |
| CROWN COLLEGE; and DOES 1 through |) | |
| 10, |) | |
| |) | |
| Defendants. |) | |

I, Adrienne Rocco, declare as follows:

1. I am over 18 years of age, am competent to testify and make this declaration based on my personal knowledge.
2. I worked for Crown College as admissions representative from early 2000 to May 2001 and then I requested a transfer to student services and I worked there approximately a year and then resigned.
3. I resumed working for Crown on September 2004 and then again April 11, 2006.

1 4. During my last employment at Crown I was instructed to tell the
2 prospective students "anything" in order to get them enrolled. I was told to
3 "exaggerate the truth" and let potential/current and restarting students know that
4 "our credits will transfer anywhere in the United States because we provide an
5 education to every student in the company."

6 5. I was told by Sheila Mullineaux to misrepresent to prospective/current
7 and restarting students who inquired about the lawsuits against Crown College that
8 it was case of mistaken identity and that the "Crown College" cited in the lawsuit
9 was actually a "Crown College" in Minnesota. I was also informed to make this
10 misrepresentation to prospective/current and restarting students who inquired
11 about Crown being on "probation" with the ACCSCT.

12 6. Sheila Mullineaux instructed me and other Crown College staff to back
13 date the cancellation/no show dates for numerous students. This was because on
14 numerous occasions, Crown College drew funds from the Department of Education
15 and/or the Northwest Educational Loan Association after a student had cancelled or
16 not fully attended. This was in violation of the refund policies of the Department of
17 Education and the ACCSCT. See Exhibit "A_" attached hereto.

18 7. I was told by Sheilla M to accept faxed copies of enrollment papers which
19 is against Department of Education and ACCSCT regulations. See Exhibit "B"
20 attached hereto.

21 8. I was told by Sheila Mullineux to send out the improper enrollment
22 agreement to prospective students. This was because our enrollment in some
23 programs was lower than Crown College desired. Thus when a student sought to
24 enroll in the Business Administration program and the Criminal Justice Program
25

1 needed more enrollments, a Criminal Justice enrollment papers would be sent out
2 and the student would be encouraged to fill that out. It was corrected in other
3 records later but the enrollment agreement stayed the same so that enrollment in
4 the desired program could be artificially inflated. See Exhibit "C".

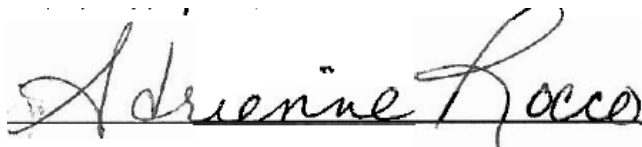
5 9. I was told by Sheila Mullineaux to write invalid job placement positions
6 for future and current students. In some cases we simply created the fact that they
7 were in jobs. Alternatively, we would hear get information that they had been
8 placed in a job and without confirming it, we would simply list them as employed in
9 that field.

10 10. I was told to use my own handwriting to initial enrollment documents that
11 were not completely filled out in violation of Department of Education and ACCSCT
12 regulations.

13 11. The amount of people attending Crown College was inflated to 318. At
14 the time I left Crown College there were 125 students.

15 I declare under penalty of perjury of the laws of the state of Washington that the
16 foregoing statements are true and correct.
17

18 Signed at Tacoma, Washington this 24th day of May 2006.
19

20
21 Handwritten signature of Adrienne Rocco in black ink, written over a horizontal line.

22 Adrienne Rocco
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