

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

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LATESHA GONZALEZ,)
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Plaintiff,)
)
vs.) No. 04-2-09023-2
)
KILLEBREW/DALTON, INC., d/b/a)
CROWN COLLEGE; and DOES 1 through)
10,)
)
Defendants.)

DEPOSITION OF JOANNE K. BLACK
June 30, 2005
Tacoma, Washington

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21
22
23
24
25

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1 BE IT REMEMBERED that on Thursday,
2 June 30, 2005, at 902 S. 10th Avenue, Tacoma, Washington,
3 at
4 1:00 p.m., before J. Gayle Hays, CCR, RPR, Notary Public in
5 and for the State of Washington, appeared JOANNE K. BLACK,
6 the witness herein;

7 WHEREUPON, the following proceedings
8 were had, to wit:

9

10

<<<<<< >>>>>>

11

12 JOANNE K. BLACK, having been first duly sworn
13 by the Notary, deposed and
14 testified as follows:

15

16

17

EXAMINATION

18

BY MR. KINNEAR:

19

Q Would you state your full name and address for the record,
20 please?

21

A Joanne Kathleen Black, 1407 Chestnut Street, Everett,
22 Washington 98201.

23

Q And Ms. Black, are you currently employed?

24

A Yes, I am.

25

Q Where are you employed?

26

A I'm employed at Contour Vought Aerospace and at the Law

1 Offices of Mary Schmidt.

2 Q And the aerospace company -- I'm sorry, I didn't catch the
3 name -- what do you do there?

4 A I'm an inspector.

5 Q You're an inspector. What do you inspect?

6 A Aerospace products, airplane parts.

7 Q Okay. And then the law office you're working for, what was
8 that again?

9 A Law Offices of Mary Schmidt.

10 Q What do you do there?

11 A I'm a bankruptcy paralegal part-time.

12 Q What sort of hours do you work there?

13 A I work Fridays.

14 Q You work Fridays?

15 A Uh-huh.

16 Q And what do you do as a bankruptcy paralegal?

17 A I prepare Chapter 7s, I pick funds, I do filings, I talk to
18 clients, prepare case files.

19 Q What hours do you work at Contour?

20 A At Contour, I work -- it varies. I will work anywhere from
21 4:00 in the afternoon to 5:30 in the morning Monday through
22 Thursday, or more if necessary.

23 Q Is that something where you have to leave today early?

24 A No. I've already had to take the day off.

25 Q Okay. Can you describe to me your educational background

1 prior to enrolling in Crown College?

2 A College, high school, what do you mean?

3 Q What high school did you go to?

4 A I went to Orland High School in Orland, California.

5 Q What year did you graduate?

6 A 1973.

7 Q Did you go to college after Orland?

8 A Yes, I did.

9 Q Where did you go to college?

10 A I went to college initially at Holy Names College, and then
11 later on, I went to San Jose City College, and Deanza
12 College.

13 Q What college was that?

14 A Deanza, D-E-A-N-Z-A, and also Chabot, C-H-A-B-O-T.

15 Q Starting with Holy Names, when did you go to Holy Names?

16 A 1973 to 1974.

17 Q And what type of -- were you enrolled in a degree program
18 at

19 Holy Names?

20 A General, just general.

21 Q Just a general education?

22 A Uh-huh.

23 Q A liberal arts education?

24 A No. This was more specific, scientific.

25 Q Scientific? Where is Holy Names located?

26 A Oakland, California.

1 Q Oakland, California. Is it a specialty type of school, or
2 is it a general liberal arts school?

3 A It specializes in nursing, microbiology.

4 Q Anything else?

5 A Not that I can remember offhand.

6 Q And what types of classes did you take there?

7 A I took microbiology, I took death and dying, I took
8 counseling, I took math, English, German.

9 Q You were there for a year, so I take it you didn't get a
10 degree there.

11 A No.

12 Q Why did you leave Holy Names College?

13 A I was a scholarship student. I wanted -- my parents were
14 having a hard time even with the scholarship, so I went to
15 work.

16 Q Where did you go to work?

17 A I went to work at Beckman Instruments.

18 Q Where is Beckman Instruments?

19 A Palo Alto, California.

20 Q What did you do there?

21 A I started out in the machine shop. I then went to --
22 over -- after I went all the way I could in the machine
23 shop, I went over to the electronics. Then after I did all
24 I could do in the electronics, I went into the prototype.

25 Q Anything beyond prototype?

1 A No.

2 Q How long were you at Beckman?

3 A Twelve years.

4 Q Twelve years. Why did you leave Beckman?

5 A I was raising my children. I had quit school and quit
6 working.

7 Q Did you go to school while you were working at Beckman?

8 A Yes, I did.

9 Q What schools did you attend while you were working at
10 Beckman?

11 A San Jose City College.

12 Q Did you attend any of the others while you were working at
13 Beckman?

14 A No.

15 Q When did you start at San Jose City College?

16 A I think in 1979. I'm not sure.

17 Q So approximately 1979?

18 A Uh-huh.

19 Q And were you working full-time while you were attending
20 San Jose City College?

21 A Yes, I was.

22 Q Did you attend in the evenings?

23 A I attended during the day. I did basically what I do now,
24 which is I went to work during the night.

25 Q And were you enrolled in a particular program at San Jose

1 City College, or were you just taking classes?

2 A I was enrolled in general ed. with an emphasis on business
3 law and business practices.

4 Q Were you enrolled full-time?

5 A Part full-time, depending on, you know, what I was doing
6 that semester.

7 Q So one quarter or one semester you might go full-time, and
8 one semester you might go part-time?

9 A Depending on my workload.

10 Q How long did you go to San Jose City College?

11 A Until 1982.

12 Q Did you get a degree from San Jose City College?

13 A No, I did not.

14 Q How many credits did you earn at San Jose City College?

15 A I don't remember.

16 Q Why did you quit going to San Jose City College?

17 A I was pregnant.

18 Q Was this your first child?

19 A Yes, it was.

20 Q And was it shortly after that that you left Beckman or
21 around the same time?

22 A Oh, no. I left Beckman in 1986.

23 Q Okay. How many children did you have then?

24 A I had three living, one deceased.

25 Q Then did you go back into the workforce after you left

1 Beckman before you went to Crown?

2 A Oh, yes, I did.

3 Q When was that?

4 A That was in 1992, I started part-time. And then in '94, I
5 went full-time.

6 Q And where was this?

7 A It was at Uthe Technology.

8 Q UP?

9 A U-T-H-E Technology.

10 Q What did they do?

11 A Ultrasonics.

12 Q Where is Uthe Technology located?

13 A San Jose, California.

14 Q What did you do with Uthe Technology?

15 A Everything.

16 Q What did "everything" encompass?

17 A Receptionist, answering the phone, assembly, inspection,
18 shipping, inventories.

19 Q Anything else?

20 A Testing. That's about it.

21 Q How long were you at Uthe Technology?

22 A For two years.

23 Q Two years full-time? You said you started part-time in
24 '92?

25 A And then I went full-time in '94 for about one or two
26 months.

1 Q Oh.

2 A And then I went over to -- I was with S&R in Milpitas.

3 Q S&R?

4 A Uh-huh.

5 Q That's the full name of the company?

6 A Yes, it is.

7 Q That's in Milpitas?

8 A Yes, M-I-L-P-I-T-A-S.

9 Q That's a city in California, I take it?

10 A Yes, it is.

11 Q Why did you leave Uthe Technology?

12 A I wanted more money. Since I was working full-time, I

13 could

14 demand more money.

15 Q So did you get more money at S&R?

16 A Oh, yes.

17 Q What did you do at S&R?

18 A I was an inspector.

19 Q What does S&R do?

20 A It was a machine shop, job shop.

21 Q So you started there in 1994?

22 A Uh-huh.

23 Q How long did you stay with S&R?

24 A I think until -- I was laid off in '96, I think. I'm not

25 sure.

26 Q And why were you laid off?

1 A It was the big computer cycle. It was down, and everyone
2 was being laid off.

3 Q Did you get a job after S&R?

4 A Yes, I did. I went back to school to refresh my machining
5 experience. And I started with -- I forget the name of the
6 company. It was a company in San Jose. And I should know
7 because I was there for many years, Intercast.

8 Q So you went back to school to refresh your machining.

9 What school was that?

10 A Oh, it was the machinist -- just the machinist school. I
11 don't remember the acronym for it. But it was just a
12 refresher; you went through CNC, and you went through
13 manual

14 again.

15 Q CNC?

16 A Computer-controlled machining.

17 Q And manual?

18 A Yes. Manual is where you're actually turning; CNC is where
19 you do the controlling.

20 Q With the computer?

21 A With the computer, yes.

22 Q And how long was that program for retraining?

23 A That was only like 45 days, 60 days, something like that.

24 Q Where was the school located?

25 A Fremont.

26 Q And how long were you at Intercast?

1 A I was at Intercast until 2000. I went from being a
2 machinist to machine shop manager.

3 Q Did you go to school at all while you were working at
4 Intercast?

5 A I went to school at San Jose City College and Deanza and
6 Chabot.

7 Q So you went back to San Jose City College?

8 A Uh-huh.

9 Q When was that?

10 A '98.

11 Q When you went back to San Jose City College in 1998, how
12 long were you there?

13 A I was doing nights in machining languages, I think, maybe a
14 year, year and a half.

15 Q And I'm sorry. You said you were doing nights in machining
16 languages?

17 A Yes. Each machine has a different language when you are
18 programming it, and so I went back to learn basically all

19 of

20 the languages for it.

21 Q So then maybe the courses that you took at San Jose City
22 College during that year were all related to machining --

23 A Yes.

24 Q -- and specifically to the languages for programming them?

25 A Yes.

26 Q Would that be like taking one class at a time, or was it

1 a --

2 A Yes. It was one class at a time.

3 Q That was for approximately a year that you went there?

4 A Uh-huh.

5 Q Did you take any other classes at that time when you went
6 back to San Jose City College?

7 A No.

8 Q Then I think you said you went to the other two schools,
9 Deanza and Chabot?

10 A Uh-huh.

11 Q What is Deanza College?

12 A Deanza is a college in Santa Clara.

13 Q Okay. And what type of college is that?

14 A Community college.

15 Q Community college. When did you go there, after you had
16 finished taking these classes --

17 A No. I went there while I was raising my children. I just
18 took one class there.

19 Q One class?

20 A Uh-huh.

21 Q What class was that?

22 A Religion -- actually religions of the world.

23 Q When was this? That was when you weren't working and you
24 were raising your children?

25 A Uh-huh.

1 Q Approximately when was that? Do you know?

2 A Maybe '88.

3 Q Around '88?

4 A Uh-huh.

5 Q And did you take any other classes at Deanza College?

6 A No. That was it.

7 Q Then you said you went -- is it Chabot College?

8 A Uh-huh, and I took machining languages there, CAD/CAMS.

9 Q What type of school is Chabot College?

10 A A community college.

11 Q It's a community college?

12 A Uh-huh.

13 Q You said you took machining CAD/CAMS?

14 A It's machining language and CAD/CAM.

15 Q Was that one class?

16 A It was Virtual Gibbs.

17 Q Is that the name of the language?

18 A Yes.

19 Q Virtual Gibbs, how do you spell Gibbs?

20 A G-I-B-B-S.

21 Q That was the only class you took at Chabot College?

22 A Uh-huh.

23 Q Where is Chabot College located?

24 A Fremont.

25 Q You went there while you were working at Intercast?

1 A Uh-huh.

2 Q And you were at Intericast until 2000, I believe you said?

3 A Uh-huh.

4 Q Why did you leave Intericast?

5 A I received an offer to do prototype work using Virtual
6 Gibbs, so I went to work there.

7 Q Where?

8 A Proto Industries.

9 Q Where is Proto Industries located?

10 A I believe, if it's still existing, it's in San Jose.

11 Q Was it in San Jose at the time?

12 A Uh-huh.

13 Q What did they do?

14 A Prototype work.

15 Q They would machine prototypes?

16 A Uh-huh.

17 Q What was your job there?

18 A I was the lead machinist, setup machinist, programmer and
19 inspector.

20 Q How long were you there?

21 A Eleven months.

22 Q And why did you leave?

23 A Because my rent had been raised to almost \$1,500 a month.

24 I

25 could no longer afford the Bay area. My family was in
26 Washington, so I moved here. I had a brother who was

1 disabled, and I knew that I would have to take care of him.

2 And his family was here, so I moved here.

3 Q So you quit --

4 A -- Intericast.

5 Q I thought you were at Proto Industries.

6 A Yeah, Proto Industries, excuse me.

7 Q So you arrived in Washington in 2001?

8 A 2000, the very end of 2000.

9 Q End of 2000?

10 A Uh-huh.

11 Q What did you do when you arrived in Washington?

12 A I got a job as an inspector in a machine shop in Redmond.

13 Q What company was that?

14 A I don't remember their name. I'm sorry.

15 Q You don't remember the name?

16 A Huh-huh.

17 Q How long were you there?

18 A I was there until October 16th when I was laid off. This
19 was a Boeing thing.

20 Q October 16th of what year?

21 A 2000.

22 Q 2000?

23 A I think it was -- I was there for less than a year, so I

24 was

25 there in November. I'm sorry. My mind is getting hazy on

26 that.

1 Q So you don't remember?

2 A I left in 2000, so it would have been 2001 in October.

3 Q That you left?

4 A Yeah. I didn't leave; I was laid off.

5 Q Laid off?

6 A Yes.

7 Q What did you do after you left the machine shop in Redmond?

8 A I looked around for a job. I found out that the machining
9 industry was leaving the Puget Sound area, that I had to
10 stay in the Puget Sound area for my brother, and so I
11 needed

12 to retrain into a different career.

13 Q So did you look for a job for a while?

14 A Oh, yes.

15 Q How long?

16 A I looked for a month, and then I knew that it was
17 impossible.

18 Q So what did you decide to do?

19 A I decided to take a workers retraining.

20 Q What is workers retraining?

21 A Workers retraining is a service offered by Washington to
22 help displaced workers. In this case, it was for the
23 machining industry where there was negative growth.

24 Q And what does that involve?

25 A That involves -- they will support you for roughly a year's
26 worth of unemployment while you attend a school to retrain

1 into another career.

2 Q So what did you decide to retrain into?

3 A I looked at the top ten, and I tried to get into the

4 medical

5 field. The school started too late, so I decided on a

6 paralegal.

7 Q You say you looked at the top ten. What was the top ten?

8 A Four of them were medical, one was waitressing. The one

9 that I matched best was the paralegal one.

10 Q And this is the top ten --

11 A Growth careers.

12 Q -- growth careers?

13 A Set out by Washington State Employment.

14 Q Okay. And the medical field -- you say the paralegal was

15 the one that you were the most qualified for. Why was

16 that?

17 A It would start earlier. The medical started only in July.

18 And I had had background in legal more than I had in

19 medical.

20 Q And what background in legal was that?

21 A The business law, my divorce, subsequent issues dealing

22 with

23 the divorce.

24 Q You say the medical field started only in July.

25 Was that a particular school?

26 A Uh-huh.

1 Q What school was that?

2 A Bellevue Community College.

1 Q And what type of course was that or program was that?

2 A It was a radiologist.

3 Q Was that the only school that offered courses in the

4 medical

5 field?

6 A Uh-huh.

7 Q No other schools offered courses in the medical field?

8 A Not that I was aware of, no.

9 Q So you decided on paralegal?

10 A Uh-huh.

11 Q It was because you thought that was the best fit for you?

12 A Uh-huh. I could use my machining skills along with my

13 engineering skills along with my business skills.

14 Q So did you look for a school to take paralegal training?

15 A Yes, I did.

16 Q Where did you look?

17 A I looked all throughout the Puget Sound area, and I had

18 decided on Edmonds Community College.

19 Q What schools did you look at?

20 A I looked at Shoreline. I looked at Skagit. I looked at

21 High Line. I looked at the legal assistant at Lake

22 Washington Technical. I went online, and that's where I

23 found Crown.

24 Q How did you select Edmonds?

25 A Edmonds was closest to me.

26 Q Where did you live at the time?

1 A Redmond.

2 Q Edmonds was closer than Shoreline?

3 A Uh-huh.

4 Q I don't know where Edmonds Community College is.

5 A It's up 405. To get to Shoreline, you've got to go across
6 520, the bridge, during peak hours.

7 Q Picking between 405 and 520 is not a choice I'd want to
8 make.

9 A It was going the opposite way on 405, the opposite commute.

10 Q Okay. So when you say -- you said Edmonds was your first
11 choice. Is that correct?

12 A Yes.

13 Q And was it solely because it was closest, or were there
14 other reasons?

15 A I had researched them. They were the first ones in the
16 area
17 with a paralegal program. They had a very good reputation.

18 In the course of doing the workers retraining, you
19 have
20 to fill out a packet, and you have to research not only the
21 school you want to go to, but every other school that's
22 around there that can offer the same thing.

23 Q So that was part of what you were required to do for
24 getting --

25 A Yes.

26 Q -- qualifying for workers retraining?

1 A Yes. You have to hand in a packet.

1 Q And Crown was one of the ones you considered at that time?

2 A I found Crown when I was doing final -- I had decided on
3 Edmonds, and I was doing a final check of the workers
4 retraining list online. And they were under it for
5 paralegal, so I called them up.

6 Q So that's how you found out about Crown was from the --

7 A Workers retraining.

8 Q -- workers retraining had a list, and they listed Crown --

9 A Yes.

10 Q -- as one of the schools --

11 A As a qualified provider. I had to only deal with qualified
12 providers.

13 Q So you called Crown?

14 A Yes, I did.

15 Q And this was at the end of 2001. Is that accurate?

16 A This was in November, December of 2001.

17 Q Do you remember who you talked to when you called Crown?

18 A Angie.

19 Q Angie? Do you know Angie's last name?

20 A Gonzalez, I think. I talked to many people, but she was

21 the

22 primary admissions representative.

23 Q Was she the first person you talked to?

24 A Yes.

25 Q Did you talk with her about Crown that first day when you
26 talked to her on the phone?

1 A Yes, I did.

2 Q What do you remember about that conversation?

3 A I told her that I was a workers retraining person, and I
4 was
5 investigating Crown.

6 And I told her everything about Edmonds, and I wanted
7 to know what Crown could offer me.

8 Q And what did she say?

9 A She said -- to summarize, she said it could offer me
10 everything that Edmonds had with a 97 percent placement
11 rate
12 in the paralegal field; and it would be accelerated, so
13 instead of doing two years through Edmonds, I could do it
14 in
15 14 months through Crown.

16 Q Did she say anything else?

17 A We talked on many occasions.

18 Q I was just talking about that first conversation.

19 A The first conversation? We talked about tuition. She said
20 I would have to try for a Pell grant. She said they had a
21 superior education. It was important to me that they had
22 practicing attorneys as teachers like Edmonds. She said
23 they have practicing attorneys.

24 Q So was there anything else in that initial conversation?

25 A We talked about transferability of credits, quality of
26 education, why I should choose Crown.

1 Q This was all in the first conversation?

2 A It was a very -- I had been prepared when I called.

1 Q And what did she say about the transferability of credits?

2 A That my credits -- I had discussed my credits from
3 California, and I did not know which school I wanted to go
4 to. And I was pretty sure that I would stay in Washington,
5 but I didn't know if I would be out of state.

6 And so she said that the credits were transferable
7 within Washington, but as far as out of state, she didn't
8 know.

9 Q Anything else she said about the transferability of
10 credits?

11 A Well, it was the exact same degree as I would get from
12 Edmonds.

13 I told her I did not know which school I wanted to go
14 to, but I wanted it left open. I wanted to -- I didn't
15 know
16 if I would continue on with school beyond that degree, but
17 it's something that I definitely wanted to keep as an
18 option. I was more interested in the 97 percent placement.

19 Q Did you ask her about the 97 percent placement?

20 A Oh, yes, I did.

21 Q What did you ask her?

22 A I asked her the placement rate, and she said that they had
23 97 percent placement within the paralegal field.

24 Q Did you ask her anything else about that?

25 A Yes. I asked her if I could talk to any of the students
26 who

1 had graduated. She said no, there was privacy issues, but
2 that they were all throughout.

1 Q Anything else that was talked about in that first
2 conversation?

3 A I may be getting into more than one conversation. I don't
4 know.

5 I talked to her for -- I checked the cloud room at
6 least three times, but I know these were things that I
7 discussed with Angie.

8 Q How soon after that initial conversation did you enroll in
9 Crown?

10 A I was told by Angie that they had worker retraining funds
11 available to help pay for tuition, and that I needed to get
12 enrolled quickly, before December 31st, if I were to be
13 eligible for any of those funds.

14 Q How soon after the initial conversation with Angie did you
15 enroll in Crown?

16 A I think within two weeks.

17 Q Within two weeks? So are you saying that there were a
18 number of conversations with Angie after that first
19 conversation but before you enrolled --

20 A Uh-huh.

21 Q -- or were there subsequent conversations after you
22 enrolled?

23 A There were subsequent, before and after.

24 Q So you're not sure when these conversation took --

25 A All of those things were covered before I enrolled.

1 Q Before you enrolled. Okay.

2 A I needed to have that put into my packet for UI.

3 Q You needed to have what put into your packet?

4 A All of the information from Crown to put into my packet to
5 qualify for UI.

6 Q Like the placement --

7 A Placement, transferability of credits, all of that stuff.

8 Q So you put all of that in your packet to --

9 A Uh-huh.

10 Q -- to unemployment?

11 A Yes.

12 Q Do you have a copy of that packet?

13 A No, I don't.

14 Q But that was information you were required to gather for --

15 A Yes. My packet was about an inch thick.

16 Q About an inch thick?

17 A Uh-huh.

18 Q What else did they require you to put in your packet?

19 A You have to --

20 Q Was it just information about Crown, or is there other
21 information?

22 A Information about what Crown can do for you, information
23 about the field itself, information about the employment
24 prospects, information from other schools, how your school
25 compares to that.

1 My packet got knocked back once because of the court
2 clerk -- because court clerk wasn't in the top ten, but
3 paralegal was.

4 Q So did you start off submitting for court clerk?

5 A I put that as what can this job -- what can this school
6 qualify you for. And Crown can qualify me as a paralegal,
7 as a court clerk, and I think one other thing.

8 Q Okay.

9 A I put in all of their web pages. I put in web pages from
10 Washington Employment figures for King County, Snohomish
11 County, Pierce County, job prospects, that type of things.

12 Q So they required you to go through quite a bit of work --

13 A A tremendous amount of time.

14 Q -- to qualify for that?

15 A They have you go through classes with them where they tell
16 what you're getting into, what your limitations are, so
17 forth and so on.

18 Q Why did you pick Crown if Edmonds was your number one
19 choice?

20 A Because they said, if you look at the course schedule, the
21 course schedule is almost the same as Edmonds. They had
22 practicing attorneys, which was the exact same as Edmonds.

23 What I had was I had a year's worth of worker
24 retraining benefits, and so I would be in trouble going the
25 two years. I would have to work and go to school, and I

1 wanted to have it accelerated. It was very important to
2 me.

3 If I was given the opportunity to have the same education
4 accelerated, that would be best for me.

5 There was a big wave of people because of the Boeing
6 thing where a lot of the Boeing people were becoming
7 paralegals. And at Edmonds there were a tremendous amount.
8 Classes were very full of people becoming paralegals. The
9 quicker I got out into the field, the quicker I would get a
10 better job.

11 Q So it was a combination of -- the acceleration was very
12 attractive to you, both because you could get ahead of this
13 wave of people, and because the timing matched pretty
14 closely with the workers retraining funding; they fund for
15 a
16 year in effect?

17 A Right.

18 Q And that helped. Is that accurate?

19 A Yes. Actually it turned out to be 18 months that they
20 funded.

21 Q Oh, they funded for 18 months?

22 A Yes.

23 Q I thought you said a year.

24 A Initially, and then they had extensions after that.

25 Q Okay. So did you get the extensions?

26 A Yes, I did. And then they had the 97 percent placement. I

1 was told by Angie that the placement papers were at the

1 college. It was an absolute certainty, 97 percent. I said
2 is it 97 percent employed, or 97 employed in the paralegal
3 field? She said 97 percent employed in the legal field.

4 Q Did you go look at the papers at Crown College?

5 A No, I did not. According to Washington State law -- from
6 what I understood from Crown and from what I understood
7 from

8 Angie, they were under Washington State law -- the
9 admissions representatives aren't allowed to lie.

10 Q Do you think she was lying to you?

11 A Oh, I know she was lying to me. I found out later that she
12 was lying to me. It took me six months to get the figures
13 out of workers retraining, but it was 68 percent, not 97;
14 and that was even if they were employed at McDonald's.

15 Q That's what you got from workers retraining?

16 A Yes, I did.

17 Q Did you ever check the papers at Crown and what they were
18 basing those numbers on?

19 A No, I did not.

20 Q No, you didn't?

21 A Huh-huh. They did not send them to me. I asked them to
22 send them to me. They said no, you would have to come to
23 Crown to get them to look at them. They're right in the
24 lobby. I said I can't do that.

25 My daughter at this time had a specific heart problem.

26 My car was not in the best of shape; going down to Tacoma

1 for a full day to look at papers when I knew that they had
2 to have a certain credibility to them in order to operate
3 within the State of Washington.

4 Q Okay. So your car wasn't working well, and your daughter
5 had a heart condition, so it was to your benefit to be at
6 home?

7 A It was to my benefit to be at home, yes, but it was not to
8 my benefit to be without a job.

9 Q Right.

10 A I needed the job, I needed to get the medical insurance, I
11 needed to get out there fast.

12 So you know, the car not being in the best of shape,
13 the daughter not being in the best of shape, it was not
14 something that I had to go to Tacoma for. I could get
15 everything online. And after a certain point, you have to
16 be able to trust the admissions representative.

17 I was also told this figure by Sheila. I was told
18 this

19 by the other admissions representative. It wasn't until I
20 brought out the Department of Education default rate that
21 they lowered it down to 83 percent of the graduates from
22 Crown were placed in the legal field, and that's when I got
23 very suspicious.

24 Q What default rate are you talking about?

25 A I had researched the Department of Education default rate
26 for student loans for Crown. When I started getting

1 suspicious of this towards the middle of the year --
2 actually before my second year -- I went to the Department
3 of Education, and through trial and error, I found this.
4 And I'm going -- I found the default rates for the years
5 involved.

6 And I'm saying, well, if they have 97 percent
7 placement, how can they have 97 percent placement if these
8 people are defaulting on their loans.

9 Q So you were talking about default on loans. And that
10 68 percent, or whatever number you said it was for the
11 default rate, was a defaulting on loans, not a placement
12 rate?

13 A Right. And that's when I asked them, I said, you know,
14 97 percent. And then I was told, oh, no, 83 percent,
15 because it was 17 percent for that year that I asked them
16 about 17 percent default rate. And they go, well,
17 83 percent of our graduates graduate.

18 Q I'm sorry. 83 what percent?

19 A 83 percent of the people who graduate.

20 Q Okay. This was a year or two after your initial
21 enrollment.

22 Is that correct?

23 A No. This was about six to eight months after my initial
24 enrollment.

25 (Exhibit No. 1 marked
26 for identification.)

1

2 Q (By Mr. Kinnear) Showing you what's been marked as
3 Exhibit 1, can you identify this document?

4 A Yes. That's the Enrollment Agreement I signed.

5 Q That is your signature on Page 2 of the agreement?

6 A Yes, it is.

7 Q And you were enrolled in the paralegal studies program. Is
8 that correct?

9 A Yes.

10 Q I'm trying to understand those numbers. I apologize if I'm
11 going back over them.

12 You were told by Angie that they had a 97 percent --

13 A -- placement --

14 Q -- placement rate --

15 A -- within the legal field.

16 Q -- within the legal field for paralegal, for the people in
17 the paralegal program.

18 Did you talk about any other courses of placement
19 rates

20 for any of their other courses of study?

21 A No, I did not.

22 Q You had mentioned court clerk, and I believe -- and correct
23 me if I'm wrong -- that if you were looking for a job as
24 court clerk, you would have enrolled in their criminal
25 justice program?

26 A I don't know. I was not going for court clerk. I was

1 merely copying what they had on their website for my
2 workers

3 retraining packet.

4 Q For the packet you put together?

5 A Uh-huh.

6 Q So you didn't discuss that?

7 A Huh-huh.

8 Q I just want to make sure I understood.

9 And then you said that it took you a long time, but
10 you

11 got some other number out of workers retraining.

12 A This was after I had been expelled.

13 Q When were you expelled?

14 A In November of 2002.

15 Q So in November of 2002 after -- was it a month after?

16 Approximately how long after November 2002?

17 A About a week before I was expelled, I had been questioning
18 workers retraining on their figure. And I asked them if
19 they could please corroborate their figure.

20 Q You asked workers retraining to check into the placement
21 rate for Crown College?

22 A Yes.

23 Q And what did they tell you?

24 A They told me it was 68 percent in any field.

25 Q Sixty-eight percent in any field?

26 A Uh-huh. Sixty-eight percent of the people who had gone to

1 Crown were employed in any field.

1 Q So do you know if that was for a particular time period, or
2 was that collectively from Crown?

3 A No. It was for -- I believe the first year was 1998
4 through

5 2000.

6 Q And so that was -- if I'm correct, it was anyone who had
7 enrolled at Crown was included?

8 A Through the workers retraining program.

9 Q Oh, these were people just in workers retraining?

10 A Uh-huh.

11 Q But it was not specific to paralegal?

12 A No. It was -- we have looked at the Social Security
13 numbers, and these people are employed.

14 Q Or they're not reporting income.

15 And you found this out right about the time -- was it
16 before you were expelled or after that you found out?

17 A No. It was after. It took many months.

18 Q You contacted them about a week before you were expelled,
19 but it took quite a while to get the answer?

20 A Yes. It's not something that you could just --

21 Q Call them up?

22 A -- call them up and ask. They had to collate it and go
23 through and find the records and everything.

24 Q And then you said you contacted the Department of
25 Education --

26 A Uh-huh.

1 Q -- about --

2 A No, I didn't contact them. I checked their website.

3 Q You checked --

4 A I found their website.

5 Q And when was this?

6 A That was some time in the summer of 2002.

7 Q What did you find on their website?

8 A I found a three-year breakdown of their student loan

9 default

10 rate.

11 Q For Crown College?

12 A Uh-huh.

13 Q For what three-year period?

14 A I think it was '98, '99 and 2000.

15 Q And what did it say?

16 A I think the lowest default rate was 17 percent, the highest

17 was 20. At 25 percent, they would have lost their ability

18 to have student funding.

19 Q So they had a default rate during that period that ran

20 between 17 percent and 20 percent?

21 A Uh-huh.

22 Q And that was for --

23 A -- student loans.

24 Q -- all students loans to students who had attended Crown

25 College?

26 A Uh-huh.

1 Q And was it broken down by categories of study?

2 A No.

3 Q Was it broken down by whether they had graduated or not?

4 A No.

5 Q And then the final number you talked about was -- you said
6 they --

7 A When I confronted them with this, I said, how can you
8 have -- because I had asked them to make sure, because we
9 were in a very bad employment period, and that's why I kept
10 asking, are you sure you have a 97 percent placement rate.
11 Yes, yes, yes.

12 Then when I found that site, I confronted them with
13 that. And I said, look, you have a default rate of this.
14 And they go, oh, well, it's 83 percent.

15 Q Who is "they"?

16 A I remember Sheila was in the background. It was one of the
17 admissions representatives.

18 Q Do you remember which admissions representative?

19 A No. I talked to many people to make sure about the
20 placement rate. But I do remember Sheila because that made
21 me feel better.

22 Q Who told you 83 percent?

23 A Sheila was there.

24 Q Did Sheila tell you?

25 A She either told me, or I heard her saying it. She either

1 told me, or she was in the background, yes.

2 Q So you don't know for sure who told you, but Sheila was
3 present?

4 A Yes. Sheila was present. It was on the phone. I said,
5 are
6 you sure about this.

7 Q It was on the phone? How do you know Sheila was in the
8 background?

9 A Because she was talking to Sheila.

10 Q Who is "she"?

11 A The person I was talking to on the phone.

12 Q But we don't know who that is?

13 A No. I don't remember who that was.

14 Q You remember the 83 percent but not the person?

15 A Oh, yeah, you bet I remember the 83 percent.

16 Q And this was in the summer of 2002?

17 A Uh-huh.

18 Q Did that bother you?

19 A It bothered me because it was yet another thing that I was
20 finding out that was wrong.

21 MR. KINNEAR: Can we take about a five
22 to ten-minute break?

23

24 (Break taken 2:05 p.m. to 2:12 p.m.)

25

26 (Exhibit No. 2 marked

1 for identification.)

2

3 EXAMINATION (Continuing)

4 BY MR. KINNEAR:

5 Q You were an online student. Is that correct?

6 A Yes.

7 Q And was that beneficial to you not to have to commute to
8 school?

9 A It made no difference.

10 Q It made no difference?

11 A Huh-huh.

12 Q Showing you what's been marked as Exhibit No. 2, can you
13 identify what that is?

14 A It looks to be a form submission.

15 Q Of what?

16 A For Crown College.

17 Q Looking at Page 2 of that document, it is a form submission
18 that's an e-mail apparently from foggynights@peoplepc.com.

19 Do you know whose address that is?

20 A That was mine.

21 Q So did you submit this form submission?

22 A I don't remember doing so, but I'm sure I did.

23 Q Is that information about you accurate?

24 A I think so.

25 Q It shows on there the company name as Pacific Tool, Inc.

1 Previously you testified that you had been working at a
2 machine shop in Redmond, and you couldn't remember the
3 name.

4 Is Pacific Tool, Inc. the name of the company?

5 A Yes, it is.

6 Q Have you attended any other colleges besides the ones
7 you've

8 already identified?

9 A Oh, yes.

10 Q What schools?

11 A I have attended Edmonds Community College.

12 Q Okay. When did you attend Edmonds Community College?

13 A From January of 2003 off and on until this last quarter.

14 Q Did you attend Edmonds before you went to Crown?

15 A No, I did not. And then I have attended Washington State
16 University.

17 Q January 2003 off and on until last quarter.

18 What program or courses -- program of study did you
19 enroll in there?

20 A I have an AA in general and an ATA in paralegal.

21 Q ATA? What is an ATA?

22 A Associate of technical arts.

23 Q And how many credits did you take at Edmonds?

24 A Whatever it took to get me my degrees. I don't know. I
25 don't remember offhand.

26 Q Do you have an approximate number?

1 A I think it's at least 60 to get a degree.

1 Q And did you graduate last quarter?

2 A From which one?

3 Q From Edmonds.

4 A Actually I graduated this quarter. I wanted to brush up on
5 my computer skills, so that's my ATA in paralegal.

6 Last year I graduated with my AA in general studies.

7 Actually, technically, I could have graduated the last year
8 on both the paralegal and the AA. I just wanted to go back
9 and get my computer skills.

10 Q So last year you graduated. When last year did you
11 graduate

12 with your general AA?

13 A June.

14 Q So from January of 2003 until June of 2004, you attended
15 Edmonds Community College?

16 A Uh-huh.

17 Q You graduated with an AA degree?

18 A Uh-huh, and I completed my ATA except for my computer
19 skills.

20 Q So you just had one more class that you needed to take?

21 A I just wanted to take some other classes to make sure I was
22 good with my office skills, my Word, my Excel.

23 Q So those weren't required for graduation, or were they?

24 A They were not required for graduation. They were
25 required -- you needed to sign off on your computer skills.

26 Q And then you're presently attending Washington State?

1 A Uh-huh. I will be attending in the fall.

2 Q So you haven't started yet?

3 A No. I did start last fall, and then I broke off to get my
4 computer skills at Edmonds. So I went to Washington State,
5 Edmonds, and now I'm going back to Washington State.

6 Q How long did you --

7 A Just took one quarter.

8 Q One quarter. What were you enrolled in there?

9 A Criminal justice.

10 Q How many classes did you take?

11 A Three.

12 Q What classes?

13 A Ethics, political science, and I believe it was criminal
14 investigation.

15 Q Then you just went one quarter at Washington State?

16 A Uh-huh.

17 Q Is that a local campus here?

18 A Oh, no. It's long distance.

19 Q Did you do that over the internet?

20 A Uh-huh.

21 Q And then you went back to Edmonds after that one quarter?

22 A Uh-huh.

23 (Exhibit No. 3 marked
24 for identification.)

25

1 Q (By Mr. Kinnear) Can you identify what this is, Exhibit
2 No. 3?

3 A Worker Retraining Program Career Schools and Colleges
4 Application.

5 Q Is that your signature on Page 1?

6 A Yes.

7 Q Going to Page 2 of the document, is that your handwriting?

8 A The beginning is.

9 Q The name and Social Security number and address?

10 A Yes.

11 Q Then after that --

12 A That is not my handwriting.

13 Q Do you know who completed the rest of that?

14 A No, I don't.

15 Q You don't. Okay. Was the rest of that completed by Crown?

16 A It would have had to have been.

17 (Exhibit No. 4 marked

18 for identification.)

19

20 Q (By Mr. Kinnear) Showing you what's been marked as

21 Exhibit No. 4, can you identify what that is?

22 A It's a proposal.

23 Q Is that your signature on the bottom of the first page?

24 A It looks to be.

25 Q Did you prepare this?

1 A I prepared this for the Pierce County Consortium, which was
2 not my original proposal. This was the one in the middle
3 of
4 the year.

5 Q What does that mean?

6 A It means that the Pierce County Consortium -- because I
7 lived in Redmond, I could not get the Redmond Consortium
8 help with the tuition. I found out in the middle of the
9 year that Pierce County would help me with my tuition, so I
10 applied there.

11 Q Is that part of the same worker retraining?

12 A No. This is different.

13 Q This is a different program?

14 A Uh-huh. I had to fill out a different packet for that.

15 Q Had you been getting assistance with your tuition prior to
16 this date?

17 A Through federal funding.

18 Q Through the student loans or through Pell grants?

19 A Student loans and Pell grants.

20 Q But this was -- tell me about this program, what this
21 provided.

22 A This provided help with worker retraining for the tuition.

23 Q Specifically what did it provide? Did it pay for the
24 tuition?

25 A Uh-huh.

26 Q In its entirety?

1 A Yes, it did.

2 Q How much did it pay? Do you remember?

3 A No. It was only for one quarter.

4 Q It was only for one quarter?

5 A Uh-huh.

6 Q Why was it only for one quarter?

7 A I only found out about it in July. Or actually I guess

8 half

9 of the year, and then I was expelled.

10 (Exhibit No. 5 marked

11 for identification.)

12

13 Q (By Mr. Kinnear) Showing you the document that's marked

14 Exhibit 5, can you identify what this is?

15 A Textbook Payment and Return, Student Handbook and School

16 Catalog Acknowledgement.

17 Q Is that your signature on the document?

18 A Yes, it is.

19 Q And on the bottom, it indicates that you received a copy of

20 Crown College's Student Handbook and School Catalog.

21 Did you receive this?

22 A Yes, I did.

23 Q When we were talking about you found out about what you

24 believe to be a discrepancy in the placement rate based on

25 numbers that you got from the Department of Education and

26 worker retraining, I asked if it bothered you; and you said

1 that, along with a number of other things, something to
2 that
3 effect.

4 What were the other things that bothered you?

5 A The sound, the fact that the overturn of the teachers and
6 the staff was so great. And that was about the middle of
7 the year, so that's the only things I knew about then that
8 were of concern to me.

9 Q Tell me about the problem with the sound.

10 A What specifically?

11 Q I wasn't there. I don't know what the problem was with the
12 sound.

13 What was the problem with the sound?

14 A We wouldn't not be able to hear the teacher. The sound
15 would cut out.

16 Q Who is "we"?

17 A The online classes.

18 Q No one was able to hear them?

19 A Uh-huh.

20 Q How often would this happen?

21 A A minimum of twice a week, sometimes once or more a day, it
22 would cut out for long periods.

23 Q A minimum of twice a week, sometimes you said for how long?

24 A We would miss full classes because of the sound.

25 Q So for the entire period you were going there, you had this
26 problem with the sound?

1 A Yes.

2 Q And all the students that were in the online classes
3 experienced this?

4 A Yes.

5 Q And how often did you miss full classes?

6 A A lot. I missed two finals that were oral. The finals
7 could not be given.

8 Q Did they make them up, or they just didn't have them?

9 A We just didn't have them. On the second one, I handed in
10 my

11 paper. On the first one, it was a mock trial, and so we
12 just didn't have the mock trial.

13 Q What classes were those in?

14 A One was my first class, which was the trial.

15 Q What was the name of that class?

16 A I can't give you the name. It was The Trail Part II.

17 Q So it was the first class you were enrolled in?

18 A Uh-huh.

19 Q What was the other class?

20 A It was a speech class.

21 Q You say you handed in your paper?

22 A Uh-huh.

23 Q What was the paper on?

24 A A speech that we were given to do.

25 Q So it was the text of the speech you were going to give?

26 A Yes.

1 Q You said the sound would go down a minimum of twice a week.

2 For how long?

3 A At least long enough for somebody to run out looking for a

4 technician. That was during the day.

5 Q You were enrolled in the day program?

6 A I was enrolled in the day program for the first year, the

7 night program for the second.

8 Q Was it better in the night program?

9 A No.

10 Q Same problem throughout?

11 A Yes.

12 Q Any other problems with the sound that we've missed?

13 A Not that I can think of.

14 Q And then you said the overturn of teachers and staff was so

15 great.

16 A Uh-huh.

17 Q Tell me about that.

18 A For our legal classes, the first two classes, instead of

19 getting an attorney, we got a private investigator.

20 Q What classes were those?

21 A The Trial and The Office.

22 Q Did you like him as a teacher?

23 A Oh, yes, I did.

24 Q What other problems with turnover?

25 A The office turnover.

1 Q What was going on?

2 A People kept -- I could never talk to one person at a time,
3 it seemed. It was just difficult keeping the continuity.

4 Q Anything else about the turnover of the instructors and
5 office personnel that I should know?

6 A That, plus my classes got changed in mid stride.

7 Q Tell me about that.

8 A The first class was a class that we were supposed to have
9 at
10 the beginning of the semester, but they didn't get --
11 assign
12 us to it until in the middle of the semester. So they
13 wanted to put us into it at the third class of the
14 semester.

15 And I said, if we do that, it's going to wreck the
16 seven-month rotation, and I'm going to be screwed. I'll
17 have to wait the seven months for this class to come back
18 up
19 again so that I can take this class.

20 And so they were going to put me in it. They put me
21 in
22 it. I complained. I went to one of the staff, and I said
23 I
24 can't do this. Please put me into it at the end of the
25 freshman rotation. Don't you see what you're doing to me?
26 And she was able to talk to the registrar and convince the

1 registrar to put me in the end.

2 Q Who was that staff member? Do you remember?

3 A I think it was Stephanie.

4 Q So they were able to fix that problem?

5 A Yes, but I had missed two days out of my first week on that

1 class.

2 Q Did that cause a problem?

3 A There's only 12 days in a class.

4 Q What grade did you get in the class?

5 A I always got A's. And then the second one, they had
6 changed

7 the amount of credits that were needed. And so in order to
8 keep my time schedule that I had put in my packet, I had to
9 take that class during the day auditing and take the --
10 start my sophomore year during the nights, so I doubled up
11 on classes.

12 Q Was that to meet the requirements for worker retraining?

13 I'm not sure -- I don't understand. Explain it to me.

14 A It was the first part of Trial Practice which was your
15 civil

16 procedures you were supposed to get, and they decided it
17 wasn't necessary for a paralegal to have civil procedure.

18 I said it was necessary for me. I talked to Sheila.

19 We went back and forth about it. She said the best that

20 she

21 could do for me was for me to audit the class, and then I

22 would take the -- start my sophomore year at night, and I

23 said that's fine; if that's what I have to do, that's what

24 I

25 have to do.

26 Q So did they charge you for that?

1 A No. They did not charge me for that.

2 Q So they --

3 A But I also did not get graded in it, and I did not get

1 credit for it.

2 Q And -- okay.

3 A Basically I sat in on the class.

4 Q You then said that -- I believe you said that, at the time
5 we were talking about, which was the summer of 2002, that
6 those were the only problems you knew about at the time.

7 I take it -- I imply from that that there were
8 subsequent problems you learned about.

9 A Yes, there were.

10 Q What were those?

11 A They had lost -- it just snowballed from there. I think
12 the

13 first thing was they had lost this stuff, and it had to be
14 sent to them again by workers retraining, because they had
15 lost letters that I had sent them.

16 The sound continued. I found out about -- I found out
17 about my education.

18 Q They lost some letters?

19 A Uh-huh.

20 Q Were you able to get copies of the letters from some other
21 source?

22 A No. I sent them -- I believe I sent them the e-mails, an
23 e-mail of the letters that I had sent to their financial
24 aid

25 asking them to cancel the loans since I had this.

26 Q So was there confusion on the money aspect?

1 A Yes, there was.

1 Q Did it get straightened out?

2 A Four months later, yes.

3 Q But it did get straightened out?

4 A It did get straightened out.

5 Q And you made some comment about you found out about your
6 education.

7 A Yes, I did.

8 Q What did you find out about your education?

9 A I had been working and going to school nights so that I
10 could get a job. We had been told that there was an
11 internship involved in the paralegal program by Angie, and
12 then I found out that there wasn't an internship involved,
13 so I had to go find an internship.

14 I went to the U.S. Attorney's office, and I applied
15 for
16 an internship, and I got it. And I was there for one week,
17 and then they said they didn't need me anymore. I needed
18 desperately to have a job since all of my paralegal studies
19 were done. And since the only classes I was taking I had
20 already taken in San Jose City College, I was applying for
21 jobs. I was interviewing.

22 On about my fifth interview, an attorney took me aside
23 and said, you don't have the knowledge we need to be a
24 paralegal.

25 I went to the Washington State Paralegal dinner, and I
26 sat with a group of other students from Skagit and Edmonds.

1 And they were all talking about what the attorney had been
2 talking about and which I had never been taught.

3 Q Who did you work for at the U.S. Attorney's office?

4 A I don't remember.

5 Q Was that in Seattle?

6 A Yes, it was.

7 Q Downtown Seattle?

8 A Uh-huh.

9 Q Was this --

10 A I ran everything I did past Mr. Slater. And I said, have I
11 done anything wrong? And he said no.

12 Q Who is Mr. Slater?

13 A Mr. Slater was my paralegal instructor.

14 Q Who did you interview with that told you that you do not
15 have the knowledge they needed?

16 A It was a divorce attorney in Auburn, a woman. I don't
17 remember her name.

18 Q You don't remember her name?

19 A Huh-huh.

20 Q You went on about five interviews.

21 Do you remember who else you interviewed with?

22 A It was people in the paper, people on the work sites
23 looking

24 for entry paralegals.

25 Q Do you remember any specific names?

26 A No.

1 Q People in the work sites, what do you mean "work sites"?

2 A On UI, there's a job search page that you can go to, and it
3 pops up jobs that people are hiring for.

4 Q Did you ask Crown for help with placement?

5 A Yes, I did.

6 Q Who did you talk to?

7 A I talked to Georgina. I talked to Russ.

8 Q The first one was Regina?

9 A Georgina. She's the one who was in charge of the
10 internships.

11 Q What did she tell you?

12 A I think it was Georgina. It started with a G.

13 Q What did she tell you?

14 A She told me she had no contacts, that she had just started
15 off in the job.

16 I used Crown's alumni job site to look for jobs. It
17 was never updated. Whenever I found an internship, legal
18 internship, available, I would forward the information to
19 Georgina.

20 Q You said you talked to Russ, did you say?

21 A Uh-huh.

22 Q Russ, who is Russ?

23 A Stiefel.

24 Q What did he say to you?

25 A At this point in time, I asked him -- since I had been told

1 about the 97 percent placement rate in the school, I asked
2 him, please give me the names of some of the people who
3 have

4 been hired as a paralegal. He said he knew of one, and he
5 knew of one court reporter, but that I should ask Mr. Hunt.

6 Since Mr. Hunt had just moved up from California, he
7 had basically no idea about the past students.

8 Q Did you talk to anybody else about it?

9 A I complained about the alumni site, the job site not being
10 updated.

11 Q Who did you complain to?

12 A I think Mr. Wabel, Mr. Stiefel. I complained all over the
13 place.

14 Q Did you talk personally with Mr. Wabel? Was this all done
15 by e-mail?

16 A Some of it was done by e-mail. My conversations with
17 Mr. Wabel were done by e-mail and by phone.

18 Q What did Mr. Wabel tell you?

19 A About the job, or about the sound?

20 Q You were talking about the site being updated, the alumni
21 site being updated.

22 A I just sent him an e-mail on that. It was a general e-
23 mail.

24 I was giving them sites that they could put on their alumni
25 site to improve.

26 Q So it was suggestions to improve it?

1 A Uh-huh.

1 Q You said you talked with Mr. Wabel by phone?

2 A Uh-huh.

3 Q What did you talk to him about?

4 A The sound.

5 Q The sound?

6 A Uh-huh.

7 Q What did he say to you?

8 A He told me in February that, when I said we can't do this

9 anymore, we have to have sound in the classroom, he told

10 me,

11 first of all, he knew of no problem; second of all, that we

12 had a stinky room.

13 Q A what?

14 A What he called it a stinky room.

15 Q Stinky room?

16 A Uh-huh.

17 Q What is a stinky room?

18 A Where the sound was just bad. This was one room where it

19 was bad. No one had informed him. None of the staff or

20 any

21 of the students had informed him about any sound problems.

22 Q What else did he say?

23 A He said that he would try to fix it.

24 Q Anything else?

25 A He said it would be repaired in three weeks.

26 Q Was it?

1 A No.

1 Q Did you ever move out of the stinky room?

2 A No. I asked. I was told that we could not.

3 Q Is "stinky room" a technical term?

4 A That's just what he called it.

5 Q What other problems with your education? I'm sorry. You
6 said you went to a paralegal dinner --

7 A Uh-huh.

8 Q -- and that the students who had attended other schools
9 were

10 talking about what the attorney had been talking about.

11 You

12 said something like that. I didn't understand what that
13 means.

14 A And other things; dealing with civil procedure, binders,
15 Bates stamps, research, everything to do with a paralegal.

16 Q And these were things that you were not familiar with?

17 A Yes.

18 Q What were those things? It was binders --

19 A The court binders, the working papers; civil procedure as
20 regards to King County; court locations. Bates stamps was

21 a

22 big one, because I looked like a fool.

23 Q Anything else?

24 A I think it was summarizing depositions, other things. It
25 became very apparent to me that my education was not on par
26 with what they had gotten.

1 Q So you had a paralegal degree from Edmonds. Is that
2 correct?

1 A Uh-huh.

2 Q Did you take a number of paralegal training classes at
3 Edmonds?

4 A Yes, I did.

5 Q How many?

6 A Probably around ten.

7 Q What were those classes?

8 A Employment law, intro to law, legal research, civil
9 procedure, torts, contracts, intellectual property,
10 probate.

11 I know I'm missing a couple.

12 Q Did you find those substantially different than the classes
13 at Crown?

14 A Extremely.

15 Q What were the differences?

16 A Basically my whole education at Crown was covered in the
17 intro to law class. This is very upsetting to me. I need
18 a
19 break right now.

20 (Break taken 2:54 p.m. to 2:58 p.m.)

21

22 EXAMINATION (Continuing)

23 BY MR. KINNEAR:

24 Q I apologize if this is difficult for you. And if it would
25 be better to continue it at some other time, we can do
26 that.

1 A No. I can't afford it.

2 Q I don't want to put you under undue stress.

1 A No, thank you.

2 Q And I guess I want to make sure that you feel in decent
3 condition to answer the questions.

4 A Yes. It was just the shock that just all hit me again.

5 Q Can I ask you if you're currently taking any medication?

6 A Yes, I am.

7 Q What types of medications?

8 A I take Prozac.

9 Q Prozac?

10 A Uh-huh.

11 Q Any others?

12 A No.

13 Q We were at Edmonds Community College. And you said that
14 basically the intro to law class covered your whole
15 education at Crown.

16 A Actually when I went to get my books at Edmonds, there were
17 other books there. And I was with some other paralegal
18 students. And I looked -- there was a book called The Blue
19 Book of Citations. And as we all know, that's critical to
20 Washington State law.

21 And I held it up and I go, do you think I'll need this
22 book? And they go, didn't you go to a paralegal class?

23 And

24 I go, yeah, and they started laughing at me. So there were
25 books that I was introduced to in the intro to law that
26 were

1 critical for me that had never been part of my curriculum

2 at

1 Crown.

2 Q What books were those?

3 A The major one being the Blue Book of Citations.

4 Q And what other ones?

5 A Oh, lord. We had a CLE manual. For Crown we had the CLE

6 manual, we had the NOLA manual, we had the Torts in a

7 Nutshell, and we have Black's Law. And I think that's

8 about

9 it. So about that much books, about that many books.

10 I called the author of the CLE manual trying to
11 understand this. And I said, did you intend for your book
12 to be the backbone of the paralegal program. And she said,
13 never. It was supposed to be for paralegals who already

14 had

15 two years of paralegal experience under their belt. It
16 never was supposed to be used for a textbook.

17 So I had my legal research textbooks. I had my
18 citations. I had all of Washington court law, state law,
19 federal law. The list goes on and on.

20 Q Washington State law, a book of Washington State law?

21 A You know the CR's, the court rules, we had that. And we

22 had

23 the regs., the Washington RCW's.

24 Q The RCW's, all of them?

25 A Uh-huh.

26 Q You had a book of all the Washington --

1 A No, of three court procedures, the RCW's that go with the
2 court procedures. So we had federal court, local, legal

1 research. I had tried with Crown to get them to have more
2 books, because I had been going to the Gallagher Law
3 Library, and I talked to a research librarian, and they
4 gave
5 me this book, and I sent it to Crown. I sent it to
6 Mr. Slater. I go, this is a really good book for research.
7 And they took it and never gave it back.

8 The big one, the big one on court law -- no, I'm
9 sorry -- on the contract law. I could bring my books in.
10 You know.

11 MS. LUNDAHL: I do.

12 A The really, really big one.

13 Q (By Mr. Kinnear) I don't know what the big one is. I'm
14 sorry.

15 MS. LUNDAHL: Proctor On Torts.

16 THE WITNESS: No. It's not Proctor on
17 Torts, no, because that was in the library.

18 Q (By Mr. Kinnear) There are two on contracts, Corbin?

19 A This one has in the back the uniform code.

20 Q The UCC?

21 A I don't remember. I'm sorry.

22 Q Okay. You took your classes online. Is that correct?

23 A Uh-huh.

24 Q And online they used various citations to get you to
25 various

26 legal sources. Is that correct?

1 A I would have to say no.

1 Q They didn't?

2 A We did not follow the PowerPoints. I did download the
3 PowerPoints, but we did not follow the PowerPoints.

4 Q They didn't follow the --

5 A No. I was the one who brought up the RCW's in the class.
6 The court rules I never heard of. But the RCW's, I was the
7 one who gave the legislative ones to that.

8 Q Which class was that, in all your classes?

9 A Uh-huh. I was the researcher. Were there links? Yes,
10 there were links. I remember links. I would have to go
11 through my folders. I have all the PowerPoints I
12 downloaded.

13 Q For every class?

14 A Most every class, yeah.

15 Q Save those on your computer?

16 A No, saved them in hard copy.

17 Q You sent a number of e-mails to Crown?

18 A Oh, yes.

19 Q Did you save those?

20 A I saved a number of those, yes.

21 Q Did you save those on your computer and hard copy?

22 A Hard copy and computer.

23 Q What other problems did you experience with Crown?

24 A We've covered the sound, the losing the paperwork, the lack
25 of technical assistance.

1 Q What was the problem with lack of technical assistance?

2 A We would try to get technical help, and we were unable to.

3 Q How often did that happen?

4 A Most of the time. Stephanie was put in our classroom to
5 make sure that we could get somebody in. Sometimes even
6 Stephanie wouldn't be there. I would e-mail because I
7 couldn't get ahold of them over the phone.

8 I know for Katie -- Katie was in England -- she would
9 have me call for her to try to get ahold of people, and we
10 could never get ahold of people.

11 Q When you would call for technical support?

12 A Uh-huh.

13 Q How often did that happen?

14 A We finally were getting technical support right at the very
15 end where they would answer the phone calls in November.

16 Q So how frequently did you call technical support and not
17 get
18 an answer?

19 A Most of it up until the end. I don't remember actually
20 getting somebody over the phone for technical support until
21 November.

22 Q I apologize, but how often did this occur?

23 Was it once a month, once every two weeks? How often
24 did this occur?

25 A The first class, it was every day during the first class.

26 Q Every single day?

1 A Every single day at least two, three times a day.

2 Q Would you get an answering machine, or just no answer when
3 you called for technical support?

4 A There was an answering service. I remember that. I don't
5 remember if it was an answering machine or if it just rang.
6 I just knew that we couldn't get ahold of them.

7 Q Would you leave a message?

8 A If there was an answering machine, yes.

9 Q Or a service?

10 A Uh-huh. Mr. Fisher, Mr. Slater would send the student out
11 of class to try and get ahold of the technical people.

12 Q But they would never respond?

13 A It was very hard to get them to respond. I think at the
14 end

15 of the second class, two months into it, we still hadn't
16 gotten ahold of the technical people. So that's when I
17 called -- I started complaining to Mr. Jones.

18 Q And what happened as a result of your complaints?

19 A He sent me to Mr. Wabel.

20 Q What did Mr. Wabel say?

21 A Mr. Wabel said it was a stinky room.

22 Q That was the conversation we had earlier?

23 A Uh-huh.

24 Q Any other problems you had at Crown?

25 A Let's see, placement, the no internship, the admissions
26 officers, everything basically they said was a lie, the

1 paperwork gone.

2 I found myself being an intermediary on a lot of this
3 stuff.

4 Q Were there any other problems you experienced while you
5 were

6 at Crown? I want to make sure we've covered everything.

7 A Just a lot of lies, a lot of lies.

8 Q You've discussed what you said --

9 A Oh, and the books, the books.

10 Q What was the problem with the books?

11 A When we started, we had books being sent to us. In the
12 middle of the year, they decided that they would go with a
13 book warehouse to order books. So I tried to get my books
14 in advance, and I was told that I could not; that Crown
15 would not give them their list in advance.

16 So we wound up getting our -- I normally liked my
17 books

18 a week before my class started. And in some cases, we
19 weren't getting the books until the second week of the
20 class.

21 Q How often did that happen?

22 A Twice.

23 Q Twice?

24 A Uh-huh.

25 Q Did that problem get fixed?

26 A I don't know. I was expelled shortly afterwards.

1 Q You've filed a complaint with ACCSAT. Is that correct?

1 A Yes, it is.

2 (Exhibit No. 6 marked
3 for identification.)
4

5 Q (By Mr. Kinnear) Have you seen this document that's been
6 marked as Exhibit 6 before?

7 A No, I have never.

8 Q Could you read it?

9 A "Dear Mr. Jones."

10 Q Oh, just read it to yourself. I'm sorry.

11 A Okay. And there was also the grade acceleration. I
12 remember talking to Mr. Stiefel about the grade
13 acceleration. Okay.

14 Q When did you file your complaint with the ACCSAT?

15 A It was in the first part of 2003. I was asked by fellow
16 students not to file a complaint with them until they had
17 gotten their degrees.

18 Q So this was after you had left the school?

19 A Uh-huh.

20 Q And --

21 A I had started the complaint that week, but they had told
22 me -- they had begged me please not to file it yet until
23 they were able to get their degrees.

24 Q Which students were those?

25 A Shyla, Ricky, Kris, and I know there was more.

1 Q Do you remember --

2 A Kate.

3 Q -- any others?

4 A I know Angela didn't want me to file the report. See, they
5 told me that they were informed by their instructor that

6 any

7 contact with me would have resulted in expulsion from
8 school.

9 Q Who told you that?

10 A Shyla told me that. Robert told me that.

11 Q Robert?

12 A Uh-huh.

13 Q He wasn't one of the ones you just mentioned.

14 A Robert is also one of the ones who asked me not to do the
15 complaint.

16 Q And Shyla and Robert. Anybody else tell you that they had
17 been told that?

18 A I know I got many e-mails afterwards. I can't tell you who
19 I got them from. I forgot their names now. I know them by
20 their screen names. I don't know them by their -- right

21 off

22 the bat.

23 Q Do you have copies of those e-mails?

24 A Probably not, no.

25 Q Probably not. Why not?

26 A Because it wasn't e-mail. I'm sorry. It was instant

1 messages .

1 Q Instant messages?

2 A AOL instant message, and MSN instant message.

3 Q Does this letter accurately describe the complaint that you
4 filed with ACCSAT?

5 A Uh-huh, among other things. This is a very short summary.

6 Q Were there other things in your complaint?

7 A I would have to get out the complaint and take a look at
8 it.

9 Basically it's everything I've told you now.

10 Q So basically everything you've told me was part of your
11 complaint to --

12 A Uh-huh. There was the -- not only the transfer of credits,
13 the ABA certification when Mr. Cline came and said Mr. Hunt
14 had announced that the program was ABA certified.

15 Q When was this?

16 A That was the end of summer.

17 Q And who is Mr. Cline?

18 A One of my teachers.

19 Q He came into your class?

20 A He was my teacher.

21 Q He did this in class?

22 A Uh-huh.

23 Q What did he say?

24 A He said that the paralegal program was ABA certified.

25 I had previously talked to Mr. Wabel during the sound
26 situation about the admissions officer saying that the

1 credits were transferable. When I went into nights, I
2 talked to a couple of the students, and I found out that
3 nobody at night -- I thought that he would go ahead and
4 write a letter and say, gee, you know, because of all the
5 things that are -- you know, the laws in Washington, that
6 he
7 would write a letter and say, if you were told this, it was
8 wrong.

9 So I went on nights, and I found everyone on nights
10 believed that their credits would transfer. So at the same
11 time I talked to Mr. Wabel about saying, okay, now we're
12 being told that it's ABA certified, I also told them that,
13 again, this hadn't been corrected.

14 Later on, when I went back into the classroom,
15 Mr. Hunt's classroom, I guess, a month later, I found out
16 that neither one had been corrected, and that they still
17 felt that the ABA -- the paralegal program was ABA
18 certified.

19 Q When was this?

20 A I was asked -- I went in there to look at a class because
21 they were saying that the teacher was lecturing on his
22 vacation, and they asked me to help, because they knew I
23 would talk to Mr. Wabel. And so I talked to some people,
24 and I instant messaged and -- I'm sorry. My mind just went
25 blank.

26 And I found out that they were still under the belief

1 that it was ABA certified, and that this had not been
2 corrected.

3 Q Do you know the approximate date this occurred?

4 A October, November.

5 Q What year?

6 A 2002.

7 Q And this was a different part of the paralegal program --

8 A Uh-huh.

9 Q -- than what you were in?

10 A I was at nights in my second year.

11 Q This was the --

12 A I had friends that were still finishing up their first year
13 in paralegal.

14 Q So this was the first year in the paralegal program?

15 A And they came to me and said he's lecturing on his
16 vacation.

17 Q Who were these friends?

18 A One was Piper.

19 Q Who else?

20 A Raptor Maniac. I forget his name -- James, James Morales.

21 Q And who was lecturing on his vacation?

22 A Mr. Hunt.

23 Q Where was he?

24 A I didn't ask.

25 Q How did you know he was on vacation?

26 A No. He was lecturing in class on his vacation, concerning

1 his vacation. He wasn't teaching. He was --

2 Q I thought you meant he was doing it while he was on
3 vacation.

4 A No, no.

5 Q I apologize. I didn't understand. What was he saying?

6 A Piper just said that she was trying to get him back to the
7 subject, and that he was -- I don't remember the specifics.
8 Okay.

9 Q So you weren't actually in --

10 A Huh-huh.

11 Q -- attending that class when it happened?

12 A No.

13 Q This is what you were told?

14 A Uh-huh.

15 Q Okay. But you said that, at that time, who was still under
16 the impression that the paralegal program was ABA
17 certified?

18 A Michelle. Her name was Michelle.

19 Q And what class was Michelle in?

20 A The paralegal first year.

21 Q How did you happen -- did you e-mail her?

22 A We were IM'ing. I was trying to find out if Piper was
23 telling the truth or not.

24 Q So you were contacting other students in that class --

25 A Huh-huh.

26 Q -- with instant messaging?

1 A Uh-huh.

2 Q Do you do that when you're online in the cloud room?

3 A Uh-huh.

4 Q Is that how it works?

5 A Uh-huh.

6 Q This is what, during classroom?

7 A Uh-huh.

8 Q So you're having a side conversation during classroom?

9 A During a break.

10 Q During a break?

11 A Yeah.

12 Q I've never gone to school online. I don't know how it
13 works.

14 A No, no. They have breaks, and they have quiet times, and
15 things like that.

16 Q Grade acceleration, tell me about grade acceleration.

17 A People were given A's when their assignments hadn't even
18 been opened.

19 Q How do you know their assignments hadn't been opened?

20 A I talked to Mr. Slater.

21 Q How did Mr. Slater know?

22 A Because he had been told.

23 Q By who?

24 A They were told that their salary did not include time spent
25 for grading assignments. Basically that was supposed to be

1 time out of their pockets.

2 I know, in a couple of cases, I talked to more than

3 one

4 teacher. I talked to Mr. Stiefel about it. He goes, well,

5 grade acceleration happens in every school.

6 Q So were your grades accelerated?

7 A I was a 4.0 at Edmonds Community College, actually 3.8.

8 Were they? I believe in a couple cases, yes, because the

9 teacher had no idea what I had written.

10 Q How do you know that?

11 A Because I made reference to it.

12 Q What do you mean, you made reference to it?

13 A I made a comment concerning the paper I had handed in or a

14 test I had handed in, and they had no idea what I was

15 talking about.

16 Q What teacher was that?

17 A It was second year. I know Mr. Cline had no idea, because

18 he was abnormal psychology. And the first class we had

19 with

20 him, he said, I don't know why they put me in this class.

21 I

22 don't know anything about abnormal psychology. But I have

23 a psychiatrist that we can go to if we get into trouble.

24 Q You were saying that there was a teacher you made reference

25 to about a paper.

26 A It was a woman teacher. I don't remember her name.

1 Q You don't remember her name?

2 A No, I don't.

1 Q Okay. It was in one of -- I think the humanities. It
2 wasn't my legal courses.

3 (Exhibit No. 7 marked
4 for identification.)

5

6 Q (By Mr. Kinnear) Showing you what's been marked as
7 Exhibit 7, do you recognize this?

8 A Yes.

9 Q What is it?

10 A This is a letter. When I was expelled from Crown, as I'm
11 sure Crown knows, when you're on workers retraining, the
12 minute you stop going to school, that's the minute your
13 income ceases.

14 So I needed to go through a trial in order to get my
15 worker retraining benefits back. I had asked for
16 information from Crown on many, many occasions, and they
17 had
18 not given me information. This was another attempt on my
19 part to go through and get my transcripts so that I could
20 show the workers retraining.

21 I did not get the actual written reason why I was
22 expelled. They had told the workers retraining that I had
23 not been expelled, that I had quit. And so this threw me
24 into a tremendously big trial, and it was about six months
25 before I got my workers retraining benefits back.

26 Q Who is Monica Anderson?

1 A She's the head of ACCSAT.

2 Q So was this sent to her in connection with the complaint

3 you

4 filed?

5 A After I tried and tried and tried to get my transcript for

6 this trial in order to submit it as an exhibit, I finally

7 turned to them and I said, look, I can't get my transcript,

8 can you help me. This is what's going on. I was sent my

9 transcript.

10 Q The timing on this, if you look at the previous exhibit,

11 Exhibit 6 is dated right around the same time.

12 A Uh-huh.

13 Q It appears to be part of the same --

14 A No. It's a separate one.

15 Q -- process. This is separate from that?

16 A Uh-huh.

17 Q Okay. It discusses some of the same issues?

18 A I still have not gotten any response from ACCSAT.

19 Q You haven't?

20 A No.

21 Q Okay. Near the bottom of Exhibit 7, it says, "You can't
22 paperwork sound, though we do have tape recordings of it."

23 A Yes.

24 Q Do you have tape recordings of the sound?

25 A Yes. Kate Balance has tape recordings of the sound.

26 Q Who is Kate Balance?

1 A She's the student, one of the other students.

2 Q Do you have any tape recordings?

3 A No. I do know that other students do have tape recordings.

4 The only ones that I know that have it that are accessible
5 to me is Kate.

6 Q What other students have tape recordings?

7 A I only know them by their -- I know Kent had some.

8 Q Kent?

9 A Kent Smith had some.

10 Q Anybody else?

11 A I know just some rumors of other people making tape
12 recordings.

13 Q Do you know who?

14 A No.

15 Q You started to say you know them by their --

16 A I know some by their internet name.

17 Q Do you know their internet names?

18 A Not off the bat, no. I don't remember.

19 Q Was there something that could refresh your memory,
20 something you may have on your computer or hard copy that
21 would refresh your memory of that?

22 A No, because I wasn't interested in the tape recordings from
23 the class.

24 Q Down at the very bottom of the first page of Exhibit 7, the
25 last little bit there says, "I can send you letters that I

1 A Nothing.

2 Q Have you had any further communications with ACCSAT?

3 A No. They do not answer my e-mails.

4 Q Have you sent them e-mails?

5 A Not for a while. I tried calling. I left a message on the
6 answering service.

7 Q How long ago?

8 A I think two months ago.

9 Q And they didn't call back?

10 A No. And then I told them about the complaint, and they
11 tried to get the response from ACCSAT.

12 Q So they have written to ACCSAT?

13 A It's my understanding, yes.

14 Q It says, "I owe monies to be paid back from the 'useless'
15 education at Crown."

16 Do you owe student loans?

17 A Yes, I do.

18 Q Are you current on those or in default?

19 A I'm current on them.

20 Q Why were you expelled?

21 A Because I butchered the name of Crown, many, many reasons.

22 Q Many, many reasons?

23 A Uh-huh. I never got a written statement saying why I was
24 expelled.

25 Q Did you request one?

1 A Yes, I did.

2 Q In writing?

3 A Yes, I did.

4 Q Who did you send it to?

5 A I sent it to Crown.

6 Q Who at Crown?

7 A There was a woman who sent me a letter saying that I could
8 get reinstated at Crown after a month.

9 (Exhibit No. 9 marked
10 for identification.)

11

12 Q (By Mr. Kinnear) Maybe this will help refresh your memory,
13 or maybe not.

14 A Yes.

15 Q Showing you what's been marked as Exhibit 9, can you
16 identify that document?

17 Can you identify Exhibit 9?

18 A This is the letter that tells me that I was terminated for
19 the good of the college --

20 Q That's --

21 A -- for failure to comply with the student code of conduct.

22 Q You said it says that you can reapply within 60 days from
23 the termination date. Is that correct?

24 A Yes.

25 Q You said there was a woman who sent you this letter, which

1 appears to be Jennifer Martinez.

2 Does this refresh your recollection?

3 A I probably would have sent it to her.

4 Q Probably. You don't know?

5 A I don't remember the specifics on that.

6 Q And you sent them a letter what, requesting something?

7 A I sent them requesting my transcript and requesting the
8 reason why I was expelled, the exact reason why I was
9 expelled.

10 Q And you think you sent it to Jennifer Martinez?

11 A I know one time I sent a certified letter, and I received a
12 copy that had been signed for Sheila.

13 Q That Sheila got the letter?

14 A That they signed it for Sheila. It was addressed to
15 Sheila,

16 and they had signed it for Sheila.

17 Q And that letter was asking for --

18 A The transcript.

19 Q -- the transcript?

20 A These are things that I needed for the trial.

21 Q The trial, was this an actual trial?

22 A Yes. This was an actual trial.

23 Q In Superior Court?

24 A Under -- for UI, under a court, a judge.

25 Q Was it an administrative law judge?

26 A It may have been. I don't know.

1 Q You don't know?

2 A No. I would need the paperwork in front of me to see his
3 title.

4 Q In the letter to Sheila, did you ask for a written
5 statement

6 of the specific reasons why you had been terminated?

7 A Yes, I did.

8 Q You did?

9 A Uh-huh.

10 Q Do you have a copy of that letter?

11 A I don't know.

12 Q You don't know?

13 A Huh-huh.

14 Q Do you have the slip that was signed for it?

15 A I don't know. I'd have to go look in my box.

16 Q Your box?

17 A Uh-huh.

18 Q Do you have a box of materials relating to your time at
19 Crown?

20 A Uh-huh.

21 Q How big is the box?

22 A You don't want to know.

23 Q Yes, I do. Unfortunately I do.

24 Prior to being expelled, do you recall having any
25 phone

26 conversations with Sheila Mullineaux?

1 A Yes.

1 Q What do you remember about those conversations?

2 A I remember when I couldn't get into the room, and she
3 expelled me.

4 I remember her being very nice and correcting the
5 things about my loans.

6 I remember talking to her and saying that I was having
7 trouble getting ahold of her, and she disagreeing with that
8 and saying she always answered her messages. And I'm
9 saying, well, you're not getting your messages because I've
10 been trying to get ahold of you.

11 Q Did you talk about -- did she talk to you before you were
12 expelled?

13 A I was talking only with Russ Stiefel. And then after Russ
14 went on vacation, I was talking with Sheila.

15 Q And this was before you were expelled?

16 A Yes, it was.

17 Q And so what were those -- what was the nature of those
18 discussions?

19 A I had discussed my transcript, because I had been told at
20 the beginning of the year that they had all the paperwork
21 necessary for me for Crown including my transcripts and my
22 high school diploma.

23 In the middle of the year, I was informed by Crown
24 that

25 I could not continue on in the second year because they did
26 not have my high school diploma. I said okay, and I called

1 Orland High School, and I asked them please to rush a copy
2 of my high school diploma. And I asked them if they had
3 ever sent out a copy of my diploma, and they said no.

4 At the same time I was taking a course with Russ
5 Stiefel. And it was math --

6 MR. KINNEAR: Excuse me. Let's take a
7 five-minute break.

8

9 (Break taken 3:41 p.m. to 3:49 p.m.)

10

11 (Last question and answer read.)

12

13 A All of my credits had been rejected by Crown. And the math
14 class -- I had taken basically finite math, calculus, all
15 the rest earlier. And they refused to accept my psychology
16 and my math and the other credits. So I said okay, it's
17 from a different state, that's fine.

18 In this math class, they were teaching me how to add
19 again. And I said -- I asked Mr. Stiefel about my
20 transcript, and I wanted to be absolutely sure that they
21 had

22 judged my transcript, because now I found out that it was
23 missing paperwork, they had lost paperwork, so forth and so
24 on. I just wanted to know if they had my transcript to

25 make

26 sure it was judged.

1

We went back and forth about this, back and forth.

1 Then he went on vacation. Then I talked to Ms. Mullineaux
2 about it, and it had been judged, but it had been judged by
3 Mr. Stiefel, and I could not understand why Mr. Stiefel
4 didn't tell me, oh, well, Joanne, just these credits
5 weren't
6 transferable.

7 Q (By Mr. Kinnear) They were the credits from San Jose?

8 A Uh-huh.

9 Q Hadn't there been a big to-do about the transferability of
10 those credits earlier?

11 A With Mr. Stiefel.

12 Q You said it was at the end of your first year that this
13 occurred?

14 A No. This was in the second year that this occurred.

15 Q The second year? When was it?

16 A It came up at a sore point at the math class.

17 Q When was the math class?

18 A I couldn't tell you.

19 Q You don't know?

20 A Huh-huh.

21 Q And so that's what your conversations with Mr. Stiefel and
22 Ms. Mullineaux were about?

23 A On the transcripts, yes.

24 Q Were there other things discussed?

25 A Oh, yes, the grade acceleration.

26 Q Were there other things discussed?

1 A The loan situation; the fact that, in order for me to avoid
2 fines and all of that, I could not touch the check, and
3 they
4 kept wanting to send me the check.

5 Q Did that get fixed?

6 A Yes. That did get fixed.

7 Q And this was all in October, November of 2002?

8 A Yes.

9 Q Was anything else discussed?

10 A The sound, there was a breakdown of the sound. And one of
11 the students went there, and they had been told that it was
12 a virus that affected the backbone of the internet.

13 And at this point in time, I was doubting everything
14 that Crown said. I called Verizon, and I said, was there a
15 problem with the internet itself that would cause the
16 interruption of the classes, because we weren't getting the
17 class at all. And they laughed, and they said no, it would
18 be on the news.

19 Q When was this?

20 A Maybe a week, two weeks, before I was expelled.

21 Q Was anything else discussed with Mr. Stiefel and
22 Ms. Mullineaux?

23 A Oh, I could not talk to the staff. I was talking with
24 Mr. Stiefel only.

25 Q Why was that?

26 A The staff did not like my e-mails.

1 Q Had you been sending them a lot of e-mails?

2 A Oh, yes.

3 Q Okay. Anything else that was discussed?

4 A There may have been. Oh --

5 Q Go ahead.

6 A There was an issue where somebody was getting unsolicited
7 e-mails from me, and everyone in my address book had given
8 me their e-mail address. So I had wanted to know who was
9 getting these unsolicited e-mails, because nobody was
10 telling me that they were offended or that they didn't want
11 me to e-mail them, and they had all given me their address.

12 Q Were they students or staff members?

13 A I believe at that time it was a student, because when I was
14 being expelled, it was an unsolicited e-mail to another
15 student.

16 Q That was the concern of the school?

17 A Yes.

18 Q And they asked you not to send unsolicited e-mails to other
19 students?

20 A Every person I had on my list had asked me to e-mail them.

21 Q So were you sending a number of e-mails to the other
22 students?

23 A Uh-huh.

24 Q The thing on the high school transcript, did you supply
25 your
26 transcripts to Crown when you first enrolled?

1 A I don't remember. I don't remember if they were sent to
2 them, if I gave them, or what.

3 All I know is that the suspicion was that, since I
4 was -- I had taken many psychology classes, and I was a
5 psychology aide, and I had taken the health, and I had
6 taken

7 the math and all this stuff, why I had to repeat all these
8 classes. And so my thought was that maybe they did not --
9 they thought they did not have my transcript.

10 Q Your high school transcript?

11 A My college transcript from San Jose City.

12 Q Your college transcript?

13 A Uh-huh, since I had been told that they had both my
14 transcript from my high school and my college.

15 And then I called San Jose City, and I said, do you
16 have a record of sending my college transcript to Crown?
17 And they said no, but our records only go back eight weeks.

18 Q So they wouldn't know?

19 A They wouldn't know. I asked Mr. Stiefel, this is what I
20 was

21 concerned about, can you please just go over there and see
22 if my transcript is there. That's all I want. I just want
23 to know if it was.

24 Q Was it there?

25 A Yes. Actually I think you found it there.

26 Q It was there?

1 A It was there.

1 Q It was the high school transcript that wasn't there?

2 A No. We had gotten the high school transcript. I don't
3 know

4 when they got the college transcript. I don't know when
5 they got the high school diploma.

6 All I know is that they told me going into the second
7 year that I could not go into the second year without them
8 having my high school diploma.

9 Q So that is what had raised the question?

10 A Yes, that plus the fact that I was learning how to add
11 again

12 raised the question that this was such a basic math class.
13 Why I would have to repeat a math class I had basically had
14 in fifth grade was beyond me.

15 Q Back to when you were talking about -- I got a little
16 confused.

17 Mr. Hunt lecturing about his vacation, you were
18 communicating with -- was it Piper you said?

19 A Uh-huh.

20 Q And who was the girl you said still believed that --
21 Michelle was it?

22 A Yes. And I remember one of them was Michelle.

23 Q -- was Michelle? And you were instant messaging with them?

24 A Uh-huh.

25 Q Were they day students?

26 A Uh-huh.

1 Q So that was during their class?

1 A Yes.

2 Q You were a night student?

3 A Yes, I was.

4 Q And anybody talk to you about that you were not to go into
5 other classrooms?

6 A No. In fact, it was encouraged.

7 Q It was encouraged? Who encouraged you?

8 A When the sound would go out, especially during the first
9 year, I would go into the night class and get the documents
10 from the night class and pass them around during the day.
11 Mr. Hunt did not object to me being in the class. I

12 audited

13 one class.

14 Q You audited the class that --

15 A Just that one class.

16 Q That one that we discussed earlier?

17 A Uh-huh.

18 Q I understand. How often did you go into other classes?

19 A I went into Mr. Hunt's class once. And then on the day

20 that

21 I was expelled, Kate called me on -- I was on the computer
22 on Microsoft, and she instant messaged me, and she said, I
23 can't get any sound, something is the matter with my
24 computer, and I can't get ahold of the tech guy. Can you
25 please help me?

26 Q So what did you do?

1 A I went in there, and I tried to message the tech. And I

1 don't remember his name.

2 Then finally after a period of time, I just gave up

3 and

4 said, there's nothing I can do.

5 Q So you went in there, went into the classroom and tried to
6 send a message to the tech?

7 A Yeah, because the tech's name was up there.

8 Q Did you have any discussions with Ms. Mullineaux after you
9 were expelled?

10 A She said that the only -- that if I tried to contact anyone
11 from Crown except to get my transcript, that they would
12 take

13 legal action against me.

14 Q Was this in a phone conversation --

15 A Yes, this was.

16 Q -- or an e-mail?

17 Do you remember anything else that was discussed?

18 A That was during my expulsion.

19 Q Was it after you were expelled, or were you discussing it
20 with Ms. Mullineaux?

21 A No. She was telling me I was expelled. There was very
22 little discussion. I was listening.

23 Q Did she say why you were expelled?

24 A I had butchered the name of Crown.

25 Q Did she say that?

26 A Yes.

1 Q Was else did she say?

1 A She said I had sent an unsolicited e-mail to another
2 student.

3 Q What else?

4 A I have it written down. I would have to look for it.

5 Q Is that in the box?

6 A Probably. I don't know.

7 Q But you have it at home?

8 A Yes. I remember because I was right -- no, actually you
9 should have it, because it was in the complaint to ACCSAT.
10 And if you've got a copy of that complaint, then I was
11 writing that complaint as I was being expelled.

12 Q Okay. You were writing it as you were being expelled?

13 A Uh-huh.

14 Q Did you know you were going to be expelled?

15 A No.

16 MR. KINNEAR: I have no more questions.

17

18

19 EXAMINATION

20 BY MS. LUNDAHL:

21 Q Now, with respect to the transferability of credits, after
22 you were expelled from Crown, sometime after that you
23 started a program at Edmonds, a paralegal program at
24 Edmonds?

25 A I tried to find a paralegal program where I could transfer

1 my credits to, and there was none in Washington State.

2 Q And what paralegal programs in Washington did you talk to
3 about transferring your credits from Crown?

4 A I had previously called other schools which accepted Crown
5 credits, and I was told that they had no paralegal program.

6 Q Which schools did you contact?

7 A City and University of Phoenix.

8 Q So those were the only two schools that you knew that did
9 accept credits?

10 A Yes.

11 Q But they had no paralegal program?

12 A Right.

13 Q Now, did you contact any of the paralegal -- other
14 paralegal

15 programs in this area to see if they would accept Crown
16 credits?

17 A Yes, I did.

18 Q And do you recall which colleges or programs you contacted?

19 A I submitted the transcript to Edmonds Community College

20 with

21 the rest of my transcripts, and they gave that back to me,
22 and they said under no way, shape or form would they accept
23 these credits.

24 Q Did they give you any explanation for their refusal to
25 accept those credits?

1 A A different accreditation. It wasn't under Washington
2 State
3 law. And -- well, first of all, Edmonds is also an ABA

1 certified school.

2 But I think the main reason was because it was ACCSAT.

3 They didn't even look up the catalog, so I can't say

4 anything about what was --

5 Q So it was a type of accreditation that was the problem?

6 A Uh-huh.

7 Q Did you have any idea before you started your studies at

8 Crown College that there would be this kind of problem with

9 transferring your credits?

10 A Oh, no. It came as a total shock when I found out about

11 the

12 suit.

13 Q What information, if any, was provided to you prior to your

14 enrollment at Crown about transferability of credits?

15 A They said that the degrees were from Washington State, they

16 were under Washington State, and that they were

17 transferable

18 within Washington.

19 Q Now, did you have any reason at the time of enrollment to

20 question that statement?

21 A No, because on their web page, they were fully accredited,

22 they were from Washington State. I had talked with more

23 than one person. They were on the workers retraining. You

24 know, at that time, given the laws that I knew in

25 Washington, I was covered.

26 Q Now, you mentioned going to the paralegal association

1 dinner.

1 A Uh-huh.

2 Q And when you talk about what the attorney said, was there a
3 guest speaker at that dinner?

4 A No. The attorney was talking to me, and she felt sorry for
5 me because I was so frustrated.

6 Q Then it was not a speaker, it was someone else?

7 A A person I had interviewed with.

8 Q Now, you mentioned a conversation that you had after that
9 dinner. I believe it was with Mr. Slater.

10 A Yes.

11 Q And do you recall the content of that conversation?

12 A I was very -- I needed to know whether it was the sound or
13 the program. That was the reason why there was so big a
14 difference. At that time when I had it, I had not talked
15 to
16 the book person who said they had been having problems
17 since
18 '98 or '99, or something like that.

19 So I didn't know if it was sound problems during the
20 class, or whether it was just the class itself. So I went
21 to Mr. Slater, and I go, what's up? I said, why have you
22 done this? He said, it's not me. He was instructed by
23 Mr. Wabel to only teach us a little bit, because Mr. Wabel
24 said that the employers had told him that they only wanted
25 a
26 little bit of knowledge.

1 He talked to me about the grading situation. He said
2 he had wanted a second year for paralegal because he knew,

1 especially about the civil procedure, that we hadn't had
2 what we needed to make it out there in the workforce.

3 He told me that the thing about the transferability of
4 credits was well known, that it was well known that their
5 admissions representatives were misrepresenting, and that
6 it
7 was considered a joke.

8 He told me that he had gone to Mr. Wabel and had told
9 him that this was a problem, and that Mr. Wabel said, yes,
10 he knew it was fraud, but it doesn't matter because people
11 would only find out after they graduated. And the only
12 reason I found out early was because I was the only one who
13 had been part of the Washington State Paralegal
14 Association,

15 and I was the only one who was looking for a job, and I
16 wasn't supposed to find out. He said they aren't going to
17 find out until after they graduate.

18 Q Did that conversation with Mr. Slater take place online or
19 in person?

20 A Over the phone.

21 Q Now, when you talked about putting together your complaints
22 to the ACCSAT, did you do that by letter?

23 Or in what form was your complaint, if you recall?

24 A I believe I wrote it in Word, and then I may have pasted it
25 onto their website or I e-mailed a copy.

26 Q So it was electronically --

1 A Yes. And I was talking to Monica on the phone, so I know

1 that she had gotten it.

2 Q And when you say "Monica," you mean Monica Anderson?

3 A Yes.

4 Q Did you ever receive any written response from ACCSAT
5 except

6 for this e-mail which I believe is Exhibit 7?

7 A Maybe -- what they told me is that -- there was another
8 e-mail, and they apologized. They said that they could not
9 refund any money, because I was concerned about that. And
10 there was absolutely no recourse for us through ACCSAT.

11 Q Now, you were shown as part of the questioning from
12 Mr. Kinnear Exhibit 6, which was a letter from ACCSAT to
13 the
14 college.

15 Had you ever seen that before today?

16 A No.

17 Q And also, with respect to the letter marked as Exhibit 8,
18 the September 24, 2003 letter, to Crown College from Monica
19 Anderson, had you ever seen that before today?

20 A No.

21 Q Did you ever see any responses from Crown to the ACCSAT
22 complaint?

23 A No.

24 Q Now, let me clarify here.

25 On Exhibit 1, the enrollment agreement, what date did
26 you sign that?

1 A September 1, 2001.

1 Q Was this a form that was mailed to you, and you mailed it
2 back in?

3 A Yes.

4 Q Now, you also signed, I believe -- you also signed a form
5 regarding textbook payment and acknowledging receipt of the
6 school catalog. That's marked as Exhibit 5.

7 What date did you sign that?

8 A December 1, 2001.

9 Q So the catalog and the handbook came to you along with the
10 enrollment agreement?

11 A Yes.

12 Q Had you already basically decided to enroll at Crown prior
13 to receiving the catalog and the handbook?

14 A Oh, yeah.

15 Q And did you, in fact -- you got those along with these
16 forms, is that correct --

17 A Yes.

18 Q -- on or about December 1, 2001?

19 A Yeah, I think so.

20 Q And did you read the students handbook or the catalog?

21 A Yes, I did.

22 Q At that point in time, did you have any reason to doubt the
23 statements contained in the catalog about the
24 transferability of credits?

25 A No. It was against the law for them to say that credits

1 were transferable if they weren't transferable.

2 Q I believe you testified to that earlier.

3 Is that a statement that was made to you by one of the
4 admissions reps that basically it was illegal for them to -
5 -

6 A When I went through -- they said that the degrees were from
7 Washington State, which means that they were under either
8 RCW or ATC or ATCB, which both of them state that there are
9 fines and criminal penalty for people who lie about
10 transferability of credits.

11 Q You also talked a little bit about the problem with loans
12 caused by the office paperwork. I just want to clarify
13 that
14 a little bit.

15 Now, what paperwork was it that you were referring to?

16 A When I was qualified for this, Patricia sent them the
17 information that I had qualified for this. And I sent them
18 a letter saying, please do not take out any loans for me
19 for
20 that year because I have the WorkSource Training.

21 Q When you're referring to "this," you're referring to --

22 A What Patricia had sent them, and the letters that I sent
23 them.

24 Q The WorkSource Training Fund?

25 A Uh-huh.

26 Q It was your intent to use the WorkSource Training funds

1 rather than loan funds --

2 A Yes.

1 Q -- to pay for that part of your tuition --

2 A Right.

3 Q -- for that one quarter?

4 A Actually two quarters.

5 Q And so what happened?

6 A They had -- what happened was, I received the check in the
7 mail. And I already knew that, if I accepted the check and
8 cashed the check, that any loans and fees and interest
9 would

10 be charged to me.

11 I sent the check back, and I called the school, and I
12 said, look, this is what's going on. They said, we do not
13 have this paperwork. I said, we sent this to you. Pat
14 sent

15 this to you. No, we don't have this paperwork.

16 I sent the check back so that I would not be charged
17 for the loan. They put the check -- instead of giving it
18 back, they put it in my folder. I got Pat to send whatever
19 paperwork that she sent to them again to tell them again
20 that, yes, that I had -- I was covered for the tuition for
21 this.

22 Q And when you are speaking of Patricia, that's --

23 A Patricia Chase.

24 Q -- Patricia Chase was the WorkSource Training Consortium?

25 A Yes.

26 Q What happened as a result of the actions of Crown College?

1 A They sent the check to me again, and they wanted me to cash

1 it. No, actually they sent the check to me again. They
2 told me just to cash it. And I said no, and I sent it back
3 to them again, and they put it in the file.

4 I was talking to a new woman who was different than
5 the
6 one that I had sent the letters to because that one had
7 quit. We resent everything back. Rather than returning
8 the
9 money to Sally Mae, they left it in the folder.

10 And then in November, I think the last part of
11 November, I think Sheila was the one who sent it back to
12 the
13 Sally Mae, and all the interest and fees and all that were
14 thrown out.

15 Q But in the meantime, you had been contacted and expected to
16 pay interest and fees on this?

17 A Oh, yeah, yeah.

18 Q Okay. You mentioned that for some of your classes you
19 didn't get your books until the second week of class.

20 How long were -- was each class session at Crown
21 College?

22 A Three weeks. Each week was four days.

23 Q So in other words, on several occasions, you didn't receive
24 any textbooks until class was almost over?

25 A On two occasions, it was the Monday of the second class.

26 Q And these books were basically direct shipped to you; they

1 weren't things you could get --

2 A Yes.

1 Q -- on your own?

2 A I wanted to get them on my own, but I was not ever given

3 the

4 book list to get them on my own. Otherwise I would have.

5 I

6 would have just gotten them online. I think one I actually

7 did get online.

8 Q Part of the fees you paid to Crown included Crown supplying

9 the books to you?

10 A Yes. And I asked them for a breakdown of the book costs,

11 and I never got that either.

12 Q Do you know how much you paid each year in fees on top of

13 your tuition?

14 A Huh-huh.

15 MS. LUNDAHL: I have no further

16 questions.

17 MR. KINNEAR: I have just a couple

18 quick

19 questions.

20

21

22 EXAMINATION

23 BY MR. KINNEAR:

24 Q You mentioned -- you said something about on the sound

25 problems, until you talked to the book person, that the

26 problems had existed since 1998 or 1999.

1 Who is the book person?

2 A I would have to go back. And it was the very first book

1 person they had that was in charge of dealing with all the
2 problems with the book supplier.

3 Q So it was an employee of Crown --

4 A Yes.

5 Q -- that was in charge of coordinating getting books to
6 students?

7 A Yes.

8 Q And when was it that this conversation took place?

9 A I would say October, November. I think I started getting
10 the books in September, but I'm not sure.

11 Q Started getting the books in September when they switched
12 over to the new system?

13 A Uh-huh.

14 Q And so it was somewhere around October or November of 2002?

15 A I don't know. I would have to look.

16 Q Approximately?

17 A Yeah.

18 Q Do you have a record of this somewhere?

19 A I might.

20 Q So you don't know whether you do or not?

21 A No, I don't.

22 Q Okay. I'm just trying to clarify.

23 A That's okay.

24 Q Similarly, this conversation you just discussed with
25 Mr. Slater following the -- this was after the paralegal

1 dinner, was it, the Washington State Paralegal dinner?

2 A Yes.

3 Q When was that Washington State Paralegal dinner?

4 A I believe at the end of October.

5 Q October of 2002?

6 A I think at the very end.

7 Q And so the conversation with Mr. Slater took place within a
8 week, or was it the next day or shortly after?

9 When did it take place, I guess, is my question.

10 A It would have been within the first week. I was very
11 distraught.

12 Q Within one week of that --

13 A Uh-huh.

14 Q Okay. Have you lived at the same address since you started
15 school at Crown, or have you moved?

16 A Oh, no. I moved from where we were to the 95th Court
17 Apartment, into Everett.

18 Q I guess my question is, when you were going to Crown, what
19 was your phone number? Would that be in Crown's files?

20 A It probably was.

21 Q We had an earlier --

22 A (425) 869-0377.

23 Q Was that your phone number during the entire time you were
24 at Crown?

25 A I would have to ask Verizon. I assume so, yes.

1 Q You didn't move during that time period --

2 A No.

3 Q -- or change phone carriers or something?

4 A Huh-huh.

5 MR. KINNEAR: Those are the only
6 questions I have.

7 MS. LUNDAHL: No further questions.

8

9 (Signature reserved.)

10 (Deposition concluded at

11 4:26 p.m.)

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1 STATE OF WASHINGTON) I, J. Gayle Hays, CCR, RPR,
) ss CCR # 1964, a duly authorized
2 COUNTY OF KING) Notary Public in and for the State
 Of Washington, residing at
3 Renton, do hereby
 certify:

4
5
6 That the foregoing deposition of JOANNE K. BLACK
 was taken before me and completed on June 30, 2005, and
7 thereafter was transcribed under my direction; that the
 deposition is a full, true and complete transcript of the
 testimony of said witness, including all questions,
8 answers,
 objections, motions and exceptions;

9 That the witness, before examination, was by me
10 duly sworn to testify the truth, the whole truth, and
 nothing but the truth, and that the witness reserved the
 right of signature;

11
12 That I am not a relative, employee, attorney or
 counsel of any party to this action or relative or employee
13 of any such attorney or counsel and that I am not
 financially interested in the said action or the outcome
 thereof;

14
15 That I am herewith securely sealing the said
 deposition and promptly delivering the same to
 Attorney Grant Kinnear.

16
17 IN WITNESS WHEREOF, I have hereunto set my hand
 and affixed my official seal this 6th day of July, 2005.

18
19
20
21 _____
 J. Gayle Hays, CCR, RPR, Notary
22 Public in and for the State
 of Washington, residing at
 Renton.

23
24
25