

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

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

DEPOSITION UPON ORAL EXAMINATION OF MICHAEL NOBLES

1:00 p.m.
 Wednesday, September 28, 2005
 1200 112th Avenue Northeast, Suite C-110
 Bellevue, Washington

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APPEARANCES

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(No exhibits marked for identification.)

1 MICHAEL NOBLES, being first duly sworn by the Court
Reporter, testified as follows:

2

(Deposition commenced at 1:19 p.m.)

3

4

EXAMINATION

5

BY MR. EDMUNDS:

6

Q Would you state your name for the record.

7

A Michael David Nobles.

8

Q What is your address, Mr. Nobles?

9

A 405 South 7th Street, No. 301, Renton, Washington
98055.

10

11

Q How old are you?

12

A Thirty-five.

13

Q Are you married?

14

A Yes, sir.

15

Q To whom?

16

A To my wife.

17

Q What's her name?

18

A Edelyn Nobles.

19

Q How old is she?

20

A That's a good question. Twenty-nine, I believe.

21

Q Do you have any children?

22

A Yes.

23

Q How many?

24

A Two.

25

Q Are you now working?

1 A Yes, sir.

2 Q Where at?

3 A Bankers Auto Rebuild and Towing.

4 Q How long have you been employed there?

5 A Almost five years.

6 Q Have you retained the Lundahl law firm?

7 A No, sir.

8 Q Have you had conversations with them?

9 A Yes, sir.

10 Q When was your first conversation with them?

11 A I don't remember the date.

12 Q Do you remember the year?

13 A This year.

14 Q So 2005?

15 A Yes, sir.

16 Q Did you initiate that contact or did they?

17 A I initiated it.

18 Q What was the purpose of your initiating that contact?

19 A I saw the, I think it was on KIRO or one of the news
20 stations, reporting a suit against Crown College.

21 Q And did they also report the name of the law firm and
22 its phone number in that advertisement?

23 A No, sir, I seeked them out.

24 Q How did you find them?

25 A I had to make several phone calls. I even called, I

1 don't know if it was the "Tribune", one of the
2 newspapers that actually first had the story in it.
3 Finally, after about four phone calls I received the
4 name.

5 Q And you called them?

6 A Yes, sir.

7 Q What was the purpose of your calling them?

8 A To become a part of a suit against Crown College.

9 Q So you had that in mind when you made the call?

10 A That was the purpose of seeking them out.

11 Q When did you attend Crown College?

12 A I think I started in '96 and ended in '98, I believe.

13 Q Was the name of the college then Crown College?

14 A Yes, sir.

15 Q What program did you enroll in at Crown College?

16 A The criminal justice, associate of science, AS.

17 Q And that wasn't a paralegal study, it was in criminal
18 justice?

19 A No, sir.

20 Q So it was criminal justice?

21 A Yes, sir.

22 Q And you obtained that degree?

23 A No, sir.

24 Q What happened?

25 A I took a leave of absence.

1 Q When?

2 A I think it was the second month of '98 for 60 days.

3 Q And I take it from what you've testified to, you

4 didn't come back after 60 days?

5 A No, sir.

6 Q Why not?

7 A Because I felt I was, for lack of a better term, being

8 screwed.

9 Q So you felt you were being screwed in 1998?

10 A I was more sure of it at that point.

11 Q And tell me how you were being screwed.

12 A Well, it came down to things that were said in the

13 beginning that was offered in the classes, the

14 accreditation. Actually it wasn't -- because I was

15 wanting to continue on to a four-year degree later on

16 and that was one of the questions I had from the very

17 beginning is these credits going to be transferable.

18 And after going into the second year, a whole

19 bunch of students had a lot of questions, including

20 myself, that didn't seem to get answered. The more we

21 went outside trying to find those answers, the more we

22 found that what we thought was the case when we

23 started, wasn't the case at that point in time.

24 Q And this occurred in 1998?

25 A Yes, sir.

1 Q Do you remember the names of any of the other students
2 that were involved in this investigation?

3 A Craig House, Kara House, Emily Schaffer. There was a
4 couple others. I can't quite remember their names
5 right now.

6 Q How did you find out about Crown College?

7 A Through the television.

8 Q What kind of an ad was it on the television?

9 A Advertisement ad for Crown.

10 Q Do you recall what it talked about?

11 A It talked about getting a job, working for the police,
12 as far as I can remember, getting a degree through
13 them.

14 Q Were you interested in working for the police force at
15 that time?

16 A Uh-huh.

17 Q Are you ex-military?

18 A No, sir.

19 Q So in 1996, I think it was, do you recall -- if I were
20 to say your enrollment date was September 5, 1996,
21 would you have any reason to question that?

22 A September 5, 1996?

23 Q Yes.

24 A I don't see any reason to question it. I just know it
25 was in September.

1 Q So you know it was in September 1996?

2 A Yes, probably the 16th, I think.

3 Q And why do you say that?

4 A Because I've reviewed some paperwork and that's a
5 number that seems to come to mind.

6 Q What paperwork did you review?

7 A My paperwork that I received from Crown College,
8 paperwork that belongs to me from Crown, I guess you
9 would say.

10 Q Who did you speak with when you went into the school
11 to discuss possibly enrolling?

12 A Russ Stiefel. I think his name is S-t-i-e-f-e-l or
13 something like that.

14 Q In relation to the time you started classes, when did
15 that occur? Was it two days before, was it a couple
16 weeks before?

17 A It could have been a week.

18 Q Who set up the appointment with Mr. Stiefel?

19 A Nobody. I went in and they said I could speak to him.

20 Q So unannounced you went into the offices on the campus
21 and they referred you to Mr. Stiefel?

22 A Yes, sir.

23 Q And Mr. Stiefel was there in an office?

24 A Yes, sir.

25 Q And he took time out to speak with you; correct?

1 A Yes, sir.

2 Q How long did you speak with him for?

3 A I'm guessing 45 minutes.

4 Q What did the two of you discuss?

5 A We discussed the program.

6 Q The criminal justice program?

7 A That is correct.

8 Q And what was said about it?

9 A Well, he reiterated the advertisement on television
10 that yes, this can help you get a job in the police
11 force. I told him that I wasn't quite interested in
12 that right away, that I wanted to continue on. He
13 said that that's a very viable option, that you'll be
14 able to do that. We discussed the ins and outs of the
15 criminal justice degree and what's all involved in it.
16 We discussed the times that I could come to class. We
17 discussed the many resources that were supposedly
18 supposed to be available to me.

19 Q And what were those?

20 A Library, computer lab.

21 We also discussed internship at the end of the
22 first year, a two-week internship with a correctional
23 facility or a minimum two-week internship with a
24 correctional facility. We discussed the hands-on
25 training that would be involved with physical

1 education, different aspects of the program that he
2 highlighted.

3 Q What did he tell you about the physical education
4 aspects of the program?

5 A He said that you would have some minimal combat
6 training, experience in arresting, take-downs, that
7 kind of thing.

8 Q Were you interested in that, the take-downs?

9 A I was interested in anything that had to do with the
10 program and that was part of it.

11 Q Was there a library?

12 A No.

13 Q None at all?

14 A No. Crown College did not have their own library in
15 Renton.

16 Q What did they have?

17 A They used City University's library temporarily.

18 Q Where was that?

19 A It was right in the same parking lot.

20 Q So it was right there accessible?

21 A Yes. Well, certain times of the day it was
22 accessible.

23 Q Was it closed at night?

24 A I don't remember. When I tried to use the library, I
25 believe I tried to use it during the day, and I can't

1 quite remember the problem that they were having, but
2 the library became inaccessible and I just
3 discontinued using it.

4 Q So it was inaccessible at some point and you quit
5 using it at that point; is that accurate?

6 A I couldn't use it because it was inaccessible. That
7 would be more accurate.

8 Q So I take it you went there one day and you couldn't
9 use it?

10 A No.

11 Q What happened?

12 A It was through the other students' instructor informed
13 us that it wasn't available at this time.

14 Q An instructor told you that personally?

15 A Uh-huh.

16 Q Who was that?

17 A I believe it was Russ Ossenbach (phonetic).

18 Q And what did he say?

19 A I don't remember exact words. Paraphrasing, the
20 library is off limits for right now.

21 Q Did you check back in a week or two to find out?

22 A Yes, we all checked it out.

23 Q Not "we". I want to know you.

24 A The class as a whole checked and he made the
25 announcement --

1 Q Stop there.

2 A He made the announcement every day.

3 Q Every day he told you?

4 A Every day, sir.

5 Q Where were you sitting when he did this every day?

6 A In class.

7 Q Where's the classroom located?

8 A Second floor.

9 Q And "he" was whom?

10 A Who?

11 Q Who was the "he" that told you every day?

12 A Russ Ossenbach, the instructor.

13 Q Was that part of his introduction to the course for

14 the day?

15 A Yes, there was time that we would go and use the

16 library and there was time that it couldn't be used.

17 So if during that time we couldn't use it, he would

18 let us know. In other words, when we came to class

19 that day, if the library is not accessible, we can't

20 use it that day, he would let us know.

21 Q When was this class, what time of the day?

22 A It was during the morning, 8:00 a.m., I believe, to

23 1:00.

24 Q 8:00 a.m. to 1:00 was his class time?

25 A Uh-huh.

1 Q And for how long was his class, how many weeks, how
2 many months?

3 A I don't remember. I believe he was changed out for
4 some other instructor. I don't remember how long he
5 was there.

6 Q When he was changed out for another instructor, did
7 that new instructor tell you every day that the
8 library was inaccessible?

9 A No.

10 Q What happened with regard to the library? What was
11 said?

12 A Between him, the new instructor?

13 Q From the new instructor to the class.

14 A Nothing.

15 Q And after the new instructor came on board, did you
16 attempt to use the library at any point?

17 A I think at that point nobody bothered trying to use
18 the library.

19 Q I take it then the answer is no?

20 MR. EDMUNDS: Let's read the question back
21 and let's have a little bit of a lesson on how we can
22 get through this deposition.

23 (Pending question read back.)

24 Q Did you hear that question?

25 A Yes.

1 Q Did you understand it?

2 A Yes, sir.

3 Q What is your answer?

4 A My answer is no.

5 Q Thank you.

6 Have you tried to further your education? After
7 leaving Crown, I'm gathering sometime in '98, have you
8 tried to go back to school?

9 A I tried researching the idea while I was at Crown on
10 my leave of absence to research it, and the whole
11 point of my research was to see if the credits would
12 transfer over, and they would not. And considering I
13 have still a loan out there, I couldn't go back to
14 school.

15 Q I beg your pardon?

16 A I have a loan out there for Crown.

17 Q In 1998?

18 A Yes.

19 Q So for seven years you haven't been able to go back to
20 school?

21 A No, I haven't paid on the loan, sir.

22 Q During those seven years have you tried to go back to
23 school?

24 A You can't go back to school.

25 Q You can't. Why not?

1 A Because unless you're paying on a Title IV funding
2 loan, you cannot get Title IV funding to go back to
3 school.

4 Q So unless you pay the loan --

5 A Unless you pay on it for six consecutive months in a
6 row after you've deviated from the loan, you cannot go
7 back to school.

8 Q Let's try this. Has any governmental official told
9 you that you're not allowed to go to school anymore
10 because you haven't paid this loan?

11 A Yes.

12 Q So what school, what official has told you that you
13 cannot go to school anymore because you haven't paid
14 on this loan?

15 A NELA, Northwest Education Loan Association.

16 Q Have you considered suing them for telling you that
17 you can't go back to school?

18 A No, I have not because they're right.

19 Q They're right that you can't go back to school?

20 A You've got to pay six consecutive months on the loan
21 without deviation before you can apply for Title IV
22 funding again. That is the law.

23 Q Even if you go bankrupt?

24 A Even if you go bankrupt.

25 Q Have you gone bankrupt?

1 A Yes, I have.

2 Q When did you go bankrupt?

3 A I think it was discharged the beginning of this year.

4 Q Was that a Chapter 7?

5 A Yes.

6 Q So it's a no asset, in essence, bankruptcy?

7 A Uh-huh.

8 Q And so the loans, were they discharged in the
9 bankruptcy?

10 A No.

11 Q How much do they total?

12 A At this time, I believe eighteen thousand.

13 Q And the money is owed to whom?

14 A NELA, the collectors for NELA.

15 Q Have you attempted to make some kind of payment
16 arrangement?

17 A I've been making payment arrangements, yes.

18 Q Tell me, was there a computer lab at Crown?

19 A At the beginning, no.

20 Q And in relation to when you started, when did they
21 have one?

22 A Roughly six months later.

23 Q In the facility in Renton?

24 A Yes.

25 Q And what did it look like when the computer lab was

1 set up?

2 A A little room with three computers with poor Internet
3 connection that always went down.

4 Q So the Internet connection that was there always went
5 down. Was that 24 hours a day it was down?

6 A I don't know, sir, I wasn't there 24 hours a day.
7 During the time that I was there, there was a problem.

8 Q You said "always," so I'm taking what you mean, taking
9 you at your word that at the time you were there in
10 the computer lab it never worked.

11 A Okay, like I just said, when I was there, there was a
12 problem with it.

13 Q And what do you mean by "a problem"?

14 A Slow connection or no connection.

15 Q And this is in 1996?

16 A No, it'd be in '97.

17 Q Did you have experience using other computer
18 connections at that time in '97?

19 A I don't quite understand the question.

20 Q I'm trying to get a benchmark for the slow nature of
21 the connection.

22 A Yes, sir, I had my own computer.

23 Q Where was that?

24 A At home.

25 Q And I take it that the service, the speed of your

1 service at home was faster?

2 A Yes, sir.

3 Q Did you complain to any people affiliated with Crown
4 about the library problem?

5 A Yes.

6 Q Who to?

7 A Bonnie, the instructors.

8 Q That's plural. Who were "they"?

9 A I know I complained to Russ, I complained to -- Russ
10 Ossenbach. I know I've complained to Rick Drury. I
11 don't remember the other instructor's name.

12 Q What did you say to them?

13 A "When is this going to be dealt with?"

14 Q And what did they say?

15 A They don't know.

16 Q And I take it you had research that you needed to
17 conduct in the library; is that accurate?

18 A Yes, sir.

19 Q For what classes?

20 A I don't remember the classes. All the classes
21 negligibly required some sort of research.

22 Q Did you graduate from high school?

23 A No, sir.

24 Q Did you get your GED?

25 A Yes, sir.

1 Q Where did you go to high school?

2 A The last high school I attended was Tenino High.

3 Q In Tenino?

4 A Uh-huh.

5 Q Were you a good student in high school?

6 A I wasn't there long enough to see that I was. I
7 dropped out and tried to go back and went to Job Corps
8 and then tried to go back to school.

9 Q And they wouldn't let you back in?

10 A No, they let me back in, but I wasn't in there very
11 long.

12 Q If a high school curriculum was four years, how many
13 years did you attend?

14 A Probably two.

15 Q You dropped out?

16 A Uh-huh.

17 Q Did you work?

18 A Yes.

19 Q What did you do when you dropped out?

20 A Worked at a KFC.

21 Q And for how long did you do that?

22 A I don't know, sir.

23 Q How many --

24 A That's 20 years ago.

25 Q Let's go back through your employment then. You are

1 working at Bankers Auto Rebuild and Towing?

2 A Uh-huh.

3 Q Where are they located?

4 A In Renton.

5 Q And for almost five years you've done that?

6 A Yes, sir.

7 Q So would it be fair to say that you started in the
8 year 2000?

9 A It would.

10 Q And before you are working with Bankers Auto Rebuild
11 and Towing who did you work with?

12 A Superior.

13 Q Superior?

14 A Towing.

15 Q And for how long were you with Superior?

16 A Three days.

17 Q What happened?

18 A I got hit while on the job, I was out of work for five
19 to six months due to a back and neck injury, had to go
20 through rehabilitation.

21 Q Did the Department of Labor and Industries provide
22 coverage for that?

23 A Yes, sir.

24 Q Did you receive a disability from them?

25 A Yes, sir.

1 Q Is it permanent?

2 A No, sir.

3 Q They paid a lump sum payment; is that accurate?

4 A No, they didn't. They paid monthly, L & I coverage

5 monthly.

6 Q And before Superior who did you work for?

7 A I think it was Gene's Towing, Gene Meyers Towing.

8 There's a Gene Meyers Towing and then there's a Gene's

9 Towing.

10 Q And how long did you work for them?

11 A I'm guessing a total of a year.

12 Q And that takes us back to about 1999?

13 A Uh-huh.

14 Q What did you do prior to Gene's Towing?

15 A Worked in the sprinkler trade field, fire sprinklers.

16 Q For whom?

17 A Washington Fire Sprinklers, Fire Systems West, Western

18 States Fire Protection.

19 Q For how many years did you work in the sprinkler trade

20 field?

21 A I'm guessing two to three.

22 Q That takes us back to about '96, '97?

23 A Uh-huh.

24 Q What did you do before that?

25 A Worked for Total Living Concept.

1 Q What are they?

2 A They provide assistance to persons that are disabled.

3 Q What did you do for them?

4 A Provided assistance in their bills, provided
5 assistance in transportation, locating a place to
6 live, supervision, dealing with their doctors,
7 psychiatrist.

8 Q For how long did you do that?

9 A I'm guessing a year, year and a half. I'm not sure.

10 Q And before that what you did do?

11 A I think I was in Job Corps at that point trying to get
12 my GED.

13 Q And for how long did that take?

14 A Three months.

15 Q So let's go back to the conversation with Mr. Stiefel.

16 You say that he spoke about an internship?

17 A Yes sir.

18 Q That at the end of the first year there would be a
19 minimum of a two-week internship with a correctional
20 facility?

21 A That is correct, sir.

22 Q What happened with respect to any internship?

23 A It disappeared.

24 Q And by that, what do you mean?

25 A They no longer had it.

1 Q "They" being Crown College?

2 A Yes.

3 Q How did you find that out?

4 A When I asked Bonnie, when I asked -- I can't remember
5 his name off the top of my head. When I asked the
6 instructor that I had there, I think it was one of
7 them that they went through, they no longer had that
8 option.

9 Q Did they have any alternatives?

10 A No, sir.

11 Q What about physical training?

12 A I think they did it for one day, two days, and that
13 was it.

14 Q With whom?

15 A I don't remember the guy's name. I believe it was
16 while I was still in Russ Ossenbach's class.

17 Q So someone came in from off campus?

18 A No, we went to some gym. I don't quite remember where
19 it was.

20 Q How many credits did you compile approximately at
21 Crown?

22 A According to my recent unofficial transcript from
23 them, I believe it was twenty-four in the first year,
24 and I'm guessing maybe six to ten in the second year.

25 Q What did you intend to do with your degree at Crown?

1 A I planned on going to a four-year, get a bachelor's.

2 Q By the way, it sounds like these classes were in
3 attendance, they weren't online?

4 A Yes, sir.

5 Q Where did you want to go to school to get a four-year
6 degree?

7 A At that time I checked out several places. I checked
8 out Green River, I checked out Highline, I believe I
9 even went to the University.

10 Q Do you have a specific recollection of going to the
11 University?

12 A That's too vague. I know I visited several different
13 places.

14 Q Who did you speak with, if anybody, at Green River?

15 A It'd be the admissions counselor.

16 Q Do you have any notes or do you recall their name?

17 A No.

18 Q What were you told?

19 A I was told that Crown College is not recognized as an
20 accredited school, they do not accept any type of
21 credits from them, their accreditation is no more than
22 a K-through-12 type of accreditation.

23 (Recessed 1:54 p.m. to 1:57 p.m.)

24 Q So the person at Green River told you that Crown was
25 not accredited and that it was no better than a K,

1 dash, 12?

2 A That is correct.

3 Q And what did you do to investigate the accuracy of
4 these assertions by this person at Green River?

5 A I checked some more schools.

6 Q And that included Highline?

7 A That is correct.

8 Q And what did they say?

9 A They don't accept their accreditation.

10 Q In the one instance Green River said they weren't
11 accredited, and now I have something different from
12 Highline?

13 A Yes, they don't accept their type of accreditation.

14 Q And did you then investigate what type of
15 accreditation that Crown did have?

16 A I left that to an attorney.

17 Q And when was that?

18 A That was in '98.

19 Q What happened?

20 A I took a leave of absence and decided to contact an
21 attorney. Several of us did. Well, I took a leave of
22 absence.

23 Q And what happened with that contact with the attorney?
24 What did it lead to, if anything?

25 A Honestly, it led to us running out of money. I had no

1 money to go very far. But yes, in the checking out of
2 the different resources he has, he came to the same
3 conclusion.

4 Q Who was this?

5 A DeMers and Gagnier.

6 Q Are they still in business?

7 A Yes, sir, I believe they are.

8 Q So they checked it out and they determined what?

9 A They determined that the argument that we had that
10 their accreditation was not transferable, that nobody
11 wanted to recognize it was the case.

12 Q So that was their opinion?

13 A No, that was from their research.

14 Q So they didn't even have to go to a judge, did they,
15 because they had the answer; right?

16 A I'm sorry?

17 Q I said that's their opinion, wasn't it; and you said
18 no. I take it you're saying that it's a fact?

19 A No, I said that was their research.

20 Q That was the conclusion of their research?

21 A That is correct.

22 Q So was that an opinion they rendered to you?

23 A That was the summation from their conclusion of the
24 research they did.

25 Q Did they bring a suit?

1 A No, we didn't have the money to push it.

2 Q So they wanted cash to pursue the litigation?

3 A They wanted more, yes.

4 Q And how much had they been paid?

5 A I don't remember.

6 Q It sounds like you ran out of money. Was it a
7 significant amount of money?

8 A It was several of us that went in. And then the plan
9 that was arranged for us to pay wasn't able to be kept
10 up with due to the fact that several didn't have the
11 money and then I was left by myself.

12 Q And you decided not to pursue it therefore?

13 A I decided I didn't have the funds to pursue it, that
14 is correct.

15 Q Now, this number you gave me for the student loan,
16 which I think is sixteen thousand, is it? How much --

17 A It's eighteen thousand at this point.

18 Q And how much was it in 1998 when you graduated?

19 A Anywhere from fourteen to fifteen, I believe.

20 Q Did you receive a student handbook and a school
21 catalog?

22 A Yes, I did.

23 Q Did you receive those at or about the time you
24 enrolled?

25 A I received that at the time that I talked to Russ

1 Stiefel.

2 Q You're a careful man, aren't you?

3 A I try to be.

4 Q You read the handbook and the catalog?

5 A Yes, sir.

6 Q And is Russ Stiefel the only person from Crown that
7 you spoke with before signing the enrollment
8 agreement?

9 A Yes, sir.

10 Q Did you ever talk with or meet with a Matt McCauley?

11 A The name sounds familiar. I think there was some kind
12 of orientation later with him or something, but he
13 wasn't the admissions person that I remember.

14 Q Other than Green River and Highline discussions -- it
15 sounds like you had those discussions in 1998?

16 A Yes, sir.

17 Q What schools have you spoken with about either
18 transferring your credits or getting your degree?

19 A Since then or during that time?

20 Q Both. I thought it might just be Highline and Green
21 River that you spoke with. But if it's more, please
22 elucidate.

23 A When you call Renton Voc Tech and they say the same
24 thing -- I've talked to the Seattle Police Department.
25 They do not find that Crown College is -- how did they

1 put it. I'm paraphrasing it. I'm trying to remember.
2 The recognition in regards to their schooling, I guess
3 it's not recognizable through them.

4 Q Do they require a degree at the Seattle PD?

5 A Not that I know of.

6 Q And why would it be important that they recognized it?

7 A I don't know. John Wabel seemed to make it look
8 important.

9 Q Well, what I'm trying to follow here is you apparently
10 spoke with someone from the Seattle PD and they told
11 you that they didn't recognize Crown. I'm trying to
12 find out how that came about in a conversation with an
13 entity, the Seattle PD, that doesn't even require
14 college.

15 A Because at one point Seattle was there at the school
16 and John was trying to make it look like you'll be one
17 step further up the ladder if you have a degree.

18 And when I contacted Seattle, they said no, you
19 won't be one step up the ladder. You'll be starting
20 just like everybody else that would come out of high
21 school or with a GED because Crown College is not
22 recognized as a valuable source of schooling, or
23 whatever you want to call it.

24 Q And when did this occur? When did this conversation
25 with the Seattle PD occur?

1 A I believe they came in during the first year. And
2 then I also spoke with them in '98, called them up.

3 Q So they came in during the first year, the Seattle PD?

4 A Uh-huh.

5 Q Is that when someone who came to Crown to speak on
6 behalf of the Seattle PD told you that the Crown
7 College program was worthless?

8 A No, they told me that in '98.

9 Q What happened when the Seattle PD came to Crown in
10 '97?

11 A It was supposedly some special speaker thing. They
12 came in telling people, the different students about
13 Seattle PD.

14 Q So someone was there representing the Seattle PD. You
15 were there?

16 A Yes, sir.

17 Q Did you ask the Seattle PD about the value of the
18 Crown program and how they looked upon it?

19 A No, not directly.

20 Q Why not?

21 A I just didn't ask. That was my first year. That
22 wouldn't be a question I would ask, whether Crown
23 College would be valuable to them, considering I
24 already thought it was.

25 Q I'm just curious, because they were right in front of

1 you and I wanted to know if you did ask.

2 A No, sir.

3 Q Who did you speak with when the person apparently
4 spoke critically of Crown? Who was this at the
5 Seattle PD?

6 A I don't remember, sir. I just called the admissions
7 numbers for the colleges or called up the human
8 resource numbers that tracked them down. Some numbers
9 were given me by other students.

10 Q Who did you speak with at Renton Voc Tech?

11 A I didn't take down any names, sir.

12 Q What did they say?

13 A That their accreditation is not something they accept.

14 Q And did you speak to anybody at Crown to complain
15 about problems you were encountering in terms of
16 transfer of credits?

17 A Yes, sir.

18 Q Who?

19 A Everybody. John, Stephen, Russ. Everybody.

20 Q John, Stephen, Russ. Any other names?

21 A Bonnie, Rick.

22 Q Anybody else?

23 A Not that I can remember.

24 Q What did you say to them?

25 A Basically from what I'm hearing is that these credits

1 are not transferable, as I was told before that they
2 would be easily transferable, there shouldn't be any
3 problems, it's up to the schools, but there shouldn't
4 be any problems.

5 Q So you spoke with Highline, Green River, Renton Voc
6 Tech, the Seattle PD. Any others?

7 A Not that I can remember at this time.

8 Q So having spoken with those four entities,
9 institutions, you stopped pursuing the thought or the
10 goal of transferring and getting your four-year
11 education?

12 A Yes, sir, from Crown.

13 Q As we sit here in 2005, do you have any intention of
14 continuing your education?

15 A Yes, I do.

16 Q What's your plan?

17 A The plan is to go back to school and get a regionally
18 accredited criminal justice degree.

19 Q Any plan as to where you would go?

20 A No, sir, not yet.

21 Q And a regionally accredited criminal justice degree,
22 is that required by any of the law enforcement
23 agencies?

24 A No, sir, but it would help get you a step further.

25 Q If you wanted a job with a law enforcement agency,

1 despite these problems that you've recounted having
2 with Crown, why didn't you apply for one?

3 A Because after the Crown situation deteriorated, I
4 wound up having some issues in the family that had to
5 be dealt with.

6 Q Such as?

7 A Such as divorce, fighting for custody, things like
8 that.

9 Q The cloud hanging over those experiences, how long did
10 that last?

11 A Four years, maybe, three or four years.

12 Q Did you ultimately get some custody?

13 A No, nothing normal than an every-other-weekend father.

14 Q Both kids?

15 A No, just one. I have one from a previous marriage.

16 Q Girl or boy?

17 A Girl.

18 Q Naturally she wanted child support?

19 A Uh-huh.

20 Q And that heaped on the problems; fair to say?

21 A Yes, sir.

22 Q So you've never applied for a law enforcement
23 position?

24 A Not during those times, no.

25 Q Any time?

1 A I recently tried, but that's --

2 Q "Recently," being 2005?

3 A Yes.

4 Q Which departments are you pursuing?

5 A It's an online thing. You don't actually apply to
6 them, but you just do this thing online, and I think
7 it's called Police Quiz or something. Before you can
8 actually apply to the police force you have to take
9 some tests and stuff like that. It's a physical test
10 and some written thing.

11 Q Do these prepare you for these exams, the quiz line
12 you were talking about, or is that the actual part of
13 the test?

14 A No, all police departments, they require you at some
15 point to take a test or something like that, and it's
16 like an entrance exam to whether or not you're going
17 to be capable of applying or not, something like that.

18 Q Have you taken those yet?

19 A No, I haven't.

20 Q You're preparing to?

21 A You don't prepare. You just take it. You can work
22 out, hope you can run the mile in a good amount of
23 time.

24 Q How fast?

25 A I think it's 13 minutes.

1 Q Did you go to Oregon Coast Community College?

2 A I didn't go there. I took a GED test there.

3 Q And you got a private investigator diploma in 1996?

4 A Uh-huh.

5 Q And that was in the course of pursuing law
6 enforcement?

7 A Yes, sir.

8 Q Earlier you spoke -- and I'm almost finished, by the
9 way. Did you bring any documents with you?

10 A Yeah, I've got some complaints. I need to make sure
11 that you get copies, let you get copies of this.
12 Those are complaints against Crown College.

13 And then there's a letter that the attorney that I
14 retained wrote to Jason Woeller, a letter, and his
15 response, Jason Woeller's response. I'll let you make
16 copies of that, too.

17 And then a letter from the attorney that I
18 retained, Work Force Training and Education
19 Coordinating Board, he wrote to them and they
20 responded to him as well.

21 Q While I'm looking at this trying to speed this along,
22 you said something earlier in connection with the
23 transferability of credits about the fact that it'd be
24 up to the institution receiving the credits, the
25 request, but that you were also told that it shouldn't

1 be a problem; is that right?

2 A That is correct.

3 Q So you were told both things, that it was up to the
4 discretion of the receiving school, but that it
5 shouldn't be a problem?

6 A I was told that, just like them, if they were to
7 receive any credits, it would be up to their
8 discretion, just like any other school, but there
9 shouldn't be a problem, and they gave City University
10 as an example.

11 Q Did you contact City University?

12 A No.

13 Q Is it safe to say the package you handed me is
14 primarily records of complaints made by other
15 students?

16 A That is correct.

17 Q Do I have your permission to make copies of these?

18 A Yes.

19 MR. QUASHIE: He's concerned that some of it
20 might go -- if I could just watch you make copies.

21 MR. EDMUNDS: Oh, yes, Alphonso, you may.

22 Q Anything else, so we only have to do this once?

23 A This is a letter from the attorney that I retained to
24 Mr. Woeller and then his response -- Wabel.

25 This is just a letter to Work Force Training and

1 Education and then their response.

2 (Discussion off the record.)

3 MR. EDMUNDS: I don't have any further
4 questions at this time.

5 MS. LUNDAHL: I have a few.

6 EXAMINATION

7 BY MS. LUNDAHL:

8 Q What was your reason for choosing Crown College?

9 A The course outlined to me, it seemed pretty in-depth,
10 it had an internship, the extensive -- a couple weeks,
11 I can't remember exactly how long it was supposed to
12 be. The physical education aspect of things, I think
13 it was actually supposed to be longer than that, it's
14 been so long. The supposed transferability of the
15 credits, the resources that they were -- the library,
16 the Internet, that kind of thing, that was supposed to
17 be available, which I wound up getting my own computer
18 later on because it wasn't up to my expectations. And
19 the time that I could go to classes was supposed to
20 work well with my schedule.

21 Q Let's talk about the time. Did things change with
22 respect to the class schedules during the time that
23 you attended Crown?

24 A Yes, I started in the morning, and the latter part of
25 the first year, I believe, it changed to the evening,

1 Q During the period of time when you were initially
2 attending Crown, did Crown in fact share a campus with
3 City University, share facilities?

4 A Campus? I know that there was two buildings down in
5 Renton and the library for City University was in
6 another building and we were on the second floor. I
7 think maybe one or two rooms was used by City. I
8 can't quite remember of the building we were in, but I
9 do know that they were two separate buildings and
10 there might have been a few rooms that City University
11 used on the second floor.

12 Q There was also some discussion about the library.
13 Were representations made to you during your
14 admissions and enrollment process about Crown's
15 library?

16 A They said -- I was told by Russ that their library was
17 accessible, had plenty of resources to choose from in
18 your studies, and I didn't think further.

19 Q During the time that you were at Crown after the City
20 University library became unavailable, did Crown ever
21 secure a replacement library?

22 A No, ma'am.

23 Q Did the Renton campus of Crown College, are they still
24 operating there?

25 A Not that I know of. I believe they closed.

1 Q Do you recall about when they closed?

2 A I think it was in '98 or '99.

3 Q At the time you attended Crown College did you live in
4 Renton?

5 A No, ma'am, I lived in Covington.

6 Q So you did have to commute some distance to your
7 classes in Renton?

8 A Yes, ma'am.

9 Q You mentioned that the internship that was originally
10 discussed with you as part of the enrollment process
11 was not available, became unavailable. Was there any
12 other internship opportunities made available to you?

13 A No, ma'am.

14 Q Did you receive any physical fitness training other
15 than the one or two days in the gym that you
16 mentioned?

17 A No, ma'am.

18 Q At the time during your first year that the speaker
19 from Seattle police department came and spoke with the
20 class, did you have any reason to doubt Mr. Wabel's
21 representations concerning the assistance a Crown
22 College education might give you in placement with the
23 Seattle police department?

24 A No, ma'am.

25 Q Did anyone other than Russ Stiefel make

1 representations to you concerning about whether their
2 credits or degrees would be accepted by other
3 regionally accredited institutions?

4 MR. EDMUNDS: Objection; leading.

5 Q You can go ahead and answer.

6 A Well, the first year I didn't have any questions so
7 much as that had already been answered by Russ. It
8 was going -- well, actually the latter part of the
9 first year and into the second year, I would say, is
10 when I started thinking transferability, that I
11 started having questions, and then I'm finding out
12 from when I had mentioned it to the instructors, as
13 Rick at that time I mentioned it to, I know I
14 mentioned it to Bonnie, I know it was mentioned to
15 John because he came in, and not only did I mention
16 it, but multiple students mentioned it, that we had a
17 question in regards to the accreditation, I believe it
18 was.

19 MR. EDMUNDS: Objection; nonresponsive and
20 narrative. We'll move to strike.

21 Q Let me back up.

22 A What was the question initially? I guess maybe I was
23 thinking out loud.

24 (Pending question read back.)

25 A Generally speaking, John made mention of the

1 transferability, Bonnie, and there was Rick, too.

2 MR. EDMUNDS: Same objection; nonresponsive.

3 Move to strike.

4 Q Now, when you said "John," who were you referring to?

5 A John Wabel.

6 Q And Bonnie?

7 A I don't remember her last name.

8 Q What was her position?

9 A I think she was a site coordinator.

10 Q And Rick, do you recall his last name?

11 A He was an instructor.

12 Q Would that possibly be Rick Drury?

13 A It is.

14 Q Now, were any representations made by Crown College
15 staff concerning the accreditation status of Crown?

16 A Accreditation status?

17 Q Or the accreditation. Just strike the "status" part.

18 A Representations that they made was the same as what
19 Russ made at the beginning, that there shouldn't be
20 anybody problem. I believe I'm answering your
21 question correctly. There shouldn't be any problem
22 transferring over, but it is up to the discretion of
23 the institution.

24 MS. LUNDAHL: I have no further questions.

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FURTHER EXAMINATION

BY MR. EDMUNDS:

Q Mr. Nobles, have you ever been convicted of a crime.

A No, sir.

Q What county were you divorced in?

A King.

MR. EDMUNDS: Thank you.

(Deposition concluded 2:30 p.m.)

(Signature reserved.)

CERTIFICATE

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STATE OF WASHINGTON)

) ss.

COUNTY OF KING)

I, the undersigned Notary Public in and for the State of Washington, do hereby certify:

That the annexed and foregoing deposition of the witness named herein was taken stenographically before me and reduced to typewriting under my direction;

I further certify that said witness was afforded the opportunity to examine, read, and sign said deposition after the same was transcribed, unless indicated in the record that the parties and the witness waive the signing;

I further certify that all objections made at the time of said examination to my qualifications or the manner of taking each deposition, or to the conduct of any party, have been noted by me upon the said deposition;

I further certify that I am not a relative or employee or attorney or counsel of any of the parties to said action, or a relative or employee of any such attorney or counsel, and that I am not financially interested in the said action or the outcome thereof;

I further certify that the witness before examination was by me duly sworn to testify the truth, the

1 whole truth, and nothing but the truth;

2 I further certify that the deposition, as
3 transcribed, is a full true, and correct transcript of the
4 testimony, including questions and answers, and all
5 objections, motions and exceptions of counsel made and taken
6 at the time of the foregoing examination.

7

8

9 IN WITNESS WHEREOF, I have hereunto set my hand
10 and affixed my official seal this 10th day of October, 2005.

11

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ELAINE K. RIPPEN

Cert/Lic No. 2742

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Notary Public in and for the

State of Washington,

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Residing at Seattle

Commission Expires: 6-24-09

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DECLARATION OF WITNESS

STATE OF WASHINGTON)

) ss.

COUNTY OF _____)

Pursuant to the laws of the State of Washington, I
declare under penalty of perjury the following to be true:

I have read my deposition and the same is true and
accurate save and except for changes and/or corrections, if
any, as indicated by me on the CORRECTIONS or CHANGES page
herein.

Signed at _____, Washington on the _____ day
of _____, 2005.

MICHAEL NOBLES

(Reported by: Elaine K. Rippen)

1 NORTHWEST COURT REPORTERS Gonzales v. Killebrew/Dalton
 Elaine K. Rippen Pierce County No. 04-2-09023-2
 2 1415 Second Avenue
 Suite 1107
 3 Seattle, WA 98101 Depo: Michael Nobles
 (206) 623-6136 September 28, 2005

4

5 Please make all corrections, changes or clarifications to
 your testimony on this sheet, showing page and line number
 6 and the nature of the change. If there are no changes,
 write "none" across the page. Sign this sheet on the line
 7 provided.

8	Page	Line	Reason for Change
9	____/____/	_____	_____
10	____/____/	_____	_____
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21	____/____/	_____	_____

22 See: Wash. Reports 34A,
 Rule 30(b), USCA 28,
 23 Rule 30(e)

24 Signature: _____
 MICHAEL NOBLES

25

1 NORTHWEST COURT REPORTERS
1415 Second Avenue, Suite 1107
2 Seattle, Washington 98101
(206) 623-6136
3

October 10, 2005

4
5 TO: Michael Nobles
6 RE: Gonzales v. Killebrew/Dalton
7 DEPOSITION TAKEN: September 28, 2005

8 Dear Mr. Nobles:

9 Your deposition taken regarding the above-referenced
case has been transcribed and is ready for you to read and
10 sign.

11 You have the right to review your transcript and make
whatever changes or corrections are applicable, or you may
12 waive that right under the Court rules. If you wish to read
your deposition, I will make it available at my office at a
13 time convenient for you to come in, or you may advise me if
you wish to waive that right.

14
Please be aware that the Court rules provide that
15 signature must be accomplished within 30 days of receipt of
notice or before trial, whichever occurs first.

16
Please call me at (206) 623-6136 if you have any
17 questions.

18 Thank you for your cooperation in this matter.
19

Sincerely,

20
21
Elaine K. Rippen, RPR

22
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24 cc: Court file
Wesley Edmunds
25

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NORTHWEST COURT REPORTERS
1415 Second Avenue, Suite 1107
Seattle, Washington 98101
(206) 623-6136

DATE: October 10, 2005
TO: Wesley Edmunds

NOTICE RE FILING OF ORIGINAL DEPOSITION

RE: Case Name: Gonzales v. Killebrew/Dalton
Venue: Pierce County Superior Court
Case No.: 04-2-09023-2
Deposition of: Michael Nobles
Taken: September 28, 2005

Enclosed is the original sealed transcript of
MICHAEL NOBLES.

The original signature page and changes, if any,
received by this office will be forwarded to all counsel.

Elaine K. Rippen

cc: File
Karen Lundahl