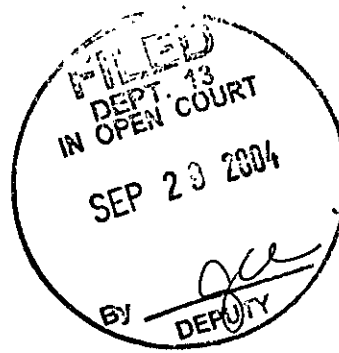


04-2-09023-2 21870682 AMCPT 10-01-04



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

9	LATESHA GONZALEZ, a single woman,	) NO. 04-2-09023-2
10	Plaintiff,	) FIRST AMENDED COMPLAINT
11	v.	) <del>Proposed</del>
12	KILLEBREW/DALTON, INC., d/b/a as CROWN	)
13	COLLEGE and DOES 1 through 10,	)
14	Defendants.	)

COMES NOW the plaintiff, Latesha Gonzalez, and alleges as follows:

**I. PARTIES, JURISDICTION AND VENUE**

1. Plaintiff is, and at all times mentioned herein was a resident of King County, Washington

2. Defendant Killebrew/Dalton, Inc. is, and at all times mentioned herein, a corporation incorporated in the State of Washington which does business, in Pierce County, Washington, as Crown College at 8739 South Hosmer, Tacoma, Washington, hereinafter referred to as "Crown".



1           10. Defendant Crown's representations to plaintiff as set forth above  
2 were made with the intent to induce reliance on them.

3           11. Plaintiff was ignorant of the falsity of Defendant Crown's  
4 representations as set forth above, and justifiably relied on them in entering  
5 into the contract with Crown.

6           12. Plaintiff's reliance on Defendant's Crown's representations as set  
7 forth above, has caused her monetary damages, including, but not limited to,  
8 tuition, books, fees, lost income from employment she left to attend Crown,  
9 interest on loans and transportation costs.

10           13. After approximately eighteen months of instruction and the  
11 accumulation of substantial Crown credits, plaintiff, in anticipation of her  
12 transfer to Gonzaga, contacted that school, and was told that none of her  
13 Crown credits would transfer.

14           14. Plaintiff subsequently inquired of several schools and was told that  
15 her Crown credits were not transferable to any school accredited by the  
16 Northwest Association of Secondary Schools and Colleges ("NASC"). Moreover,  
17 any degree issued by Crown would not be recognized by any law school in the  
18 State of Washington or in any other state.

19           15. Plaintiff's sole reason for attending Crown, which she clearly  
20 stated to Crown, was to transfer her Crown credits to Gonzaga University in  
21 order to get her Bachelor Degree there and ultimately go to law school.

22           16. All the time and financial resources plaintiff expended to  
23 attend Crown have been completely wasted.

1 III. CLAIMS

2 Common Law Fraud

3 17. Plaintiff realleges the allegations in paragraph 1 through 16,  
4 herein.

5 18. The acts and representations of Defendant Crown and its agents,  
6 representatives and employees constitute common law fraud.

7 Fraudulent Inducement

8 20. Plaintiff realleges the allegations in paragraph 1 through 16,  
9 herein. The acts and representations of Defendant Crown and its agents,  
10 representatives and employees constitute fraudulent inducement.

11 Negligent Misrepresentation

12 21. Plaintiff realleges the allegations in paragraph 1 through 16,  
13 herein.

14 22. The acts and representations of Defendant Crown and its agents,  
15 representatives and employees constitute negligent misrepresentation.

16 Intentional Misrepresentation

17 23. Plaintiff realleges the allegations in paragraph 1 through 16,  
18 herein.

19 24. The acts and representations of Defendant Crown and its agents,  
20 representatives and employees constitute intentional misrepresentation.

21 Consumer Protection Act (RCW 19.86)

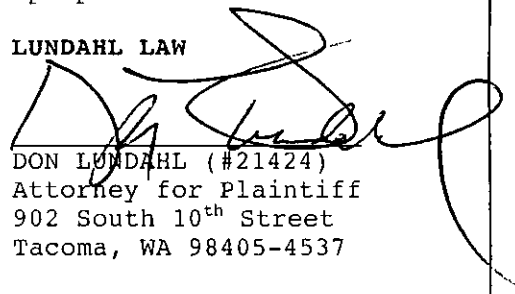
22 25. Plaintiff realleges the allegations in paragraph 1 through 16,  
23 herein.



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- 1. Damages in an amount to be determined at trail.
- 2. An injunction prohibiting Defendant Crown for continuing the practice of representing to consumers that credits earned at Crown are transferable or might be transferable to secondary schools which are accredited by the NASC pursuant to RCW 19.86.095.
- 3. Treble damages pursuant to RCW 19.86.090.
- 4. Attorney fees and costs pursuant to RCW 19.86.090.
- 5. Such other relief as the Court deems proper.

LUNDAHL LAW



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