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FILED
IN COUNTY CLERK'S OFFICE

A.M. JAN 17 2003 P.M.

PIERCE COUNTY, WASHINGTON
KEVIN STOCK, County Clerk
BY _____ DEPUTY

SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

LOLA JACKSON, AMANDA C. EBARB,
ALICIA LANDEN, and JULIA GAAN,

NO: 00-2-12358-8

Plaintiffs,

Second Amended Complaint

v.

~~(Proposed)~~

KILLEBREW/DALTON, INC., dba
Crown College, a Washington Corporation

Defendants.

Plaintiffs allege as follows:

I. The Parties

- 1.1 Plaintiff Lola Jackson is a resident of Pierce County, Washington.
- 1.2 Plaintiff Amanda Ebarb is a resident of the state of Washington.
- 1.3 Plaintiff Alicia Landen is a resident of Pierce County, Washington.
- 1.4 Plaintiff Julia Gaan is a resident of King County, Washington

1 and its conduct, Crown employees/agents represented to the plaintiffs that their
2 Crown credits would transfer to another undergraduate institution should they wish
3 to transfer, and a Crown degree would be recognized by area law schools.

4 2.6 Crown also represented that it had "state of the art" equipment and
5 materials and could enable students to receive a quality education by attending
6 classes via the internet.

7 2.7 Plaintiffs justifiably relied on these representations when deciding to
8 enroll at Crown and to remain at Crown.

9 2.8 These representations were false.

10 2.9 These representations affect a matter of public concern with the
11 ability to deceive the public.

12 2.10 Plaintiffs discovered well after enrollment that their Crown credits
13 would not transfer to other undergraduate schools in the area, and that no area law
14 school would recognize a Crown degree or Crown credits.

15 2.11 When Plaintiffs raised the transferability issue with Crown officials,
16 they were retaliated against.

17 2.12 Crown placed several of the Plaintiffs on probation and/or expelled
18 the Plaintiffs contrary to its own policies and procedures and in violation of state law
19 and federal law.

20 2.13 Plaintiff Lola Jackson was expelled for reasons contrary to Crown's
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1 own policies and procedures as well a written contract entered into with Ms. Jackson
2 just prior to her expulsion.

3 2.14 Defendants and/or its employees and agents failed to exercise
4 reasonable care or competence in advising Plaintiffs to attend Crown in light of their
5 career plans.

6 2.15 As a result of said conduct, Plaintiffs suffered damages including the
7 cost of tuition, fees, supplies, lost wages while attending Crown, other expenses
8 related to their attendance at Crown, loss of time, loans and interest on said loans,
9 and such other relief to be proven at trial.

11 III. Causes of Action

12 3.1 Defendant's liability to Plaintiffs includes, but is not limited to,
13 breach of contract, negligence, negligent and intentional misrepresentation, fraud,
14 and violation of the Consumer Protection Act.

15 IV. Prayer for Relief

16 4.1 Plaintiffs ask the court to award each Plaintiff her individual general
17 and special damages, as well as costs, attorneys fees, and such other relief as the
18 court deems proper.

19 Dated this 7 day of January, 2003.

20
21 By: 

22 PHIL BRENNAN, WSBA #25711
23 Attorney for Plaintiffs