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 FILED-Central District  
SUPERIOR COURT  
SAN BERNARDINO COUNTY

JUL 15 2008

By Stephanie Chandler  
Deputy

5 Attorneys for Plaintiffs  
6 BENCHMARK YOUNG ADULT SCHOOL, INC.  
7 AND JAYNE LONGNECKER

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF SAN BERNARDINO, CENTRAL CIVIL DISTRICT

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12 BENCHMARK YOUNG ADULT SCHOOL, )  
13 INC., a California corporation; and JAYNE )  
14 LONGNECKER, an individual, )

15 Plaintiff, )

16 v. )

17 MICHAEL CRAWFORD, an individual; and )  
18 DOES 1 through 50, inclusive, )

19 Defendant. )  
20 )  
21 )

CASE NO.: CIVSS 803920

DECLARATION OF SUSAN TRUEBLOOD IN  
SUPPORT OF PLAINTIFFS' OPPOSITION TO  
SPECIAL MOTION TO STRIKE COMPLAINT  
PURSUANT TO CCP §425.16

22 I, Susan Trueblood, declare as follows:

23 1. I make this declaration in support of Plaintiffs' Opposition To Special Motion To Strike  
24 Complaint Pursuant To CCP §425.16. I have personal knowledge of, and if called as a witness to testify  
25 could and would testify to, the following facts:

26 2. I have been a principal member in Educational Options Associates ("EOA") for  
27 approximately nine years. EOA provides educational placement options and services to parents and  
28 children.

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23 1. I make this declaration in support of Plaintiffs' Opposition To Special Motion To Strike  
24 Complaint Pursuant To CCP §425.16. I have personal knowledge of, and if called as a witness to testify  
25 could and would testify to, the following facts:

26 2. I have been a principal member in Educational Options Associates ("EOA") for  
27 approximately nine years. EOA provides educational placement options and services to parents and  
28 children.

1           3. I have been a member of the Independent Educational Consultants Association (“IECA”)  
2 for several years. IECA is the most widely recognized organization of private educational consultants.  
3 I am also a member of the Learning Disability Association.

4           4. The normal process by which I work begins when I am contacted by a parent regarding  
5 a possible placement of their child into a private educational facility. I first conduct an assessment of  
6 the child’s needs. I then provide schooling recommendations to the parents based on the results of my  
7 assessment and my knowledge of the available educational options. Parents typically then conduct their  
8 own research regarding my recommendations and make their own determination regarding what school,  
9 if any, in which to place their child.

10           5. I am familiar with Benchmark Young Adult School (“BENCHMARK”). I have placed  
11 students at BENCHMARK, as well as many other schools, over the last several years.

12           6. In the last twelve (12) to eighteen (18) months, there have been at least two or three  
13 specific instances in which my initial recommendation of BENCHMARK was rebuffed by the parents.  
14 In those instances, the parents notified me that after my initial recommendation, they had conducted  
15 their own research on the internet. In doing so, they had discovered the “Benchmark Young Adult  
16 School EXPOSED” website and reviewed the claims made on that website.

17           7. The parents notified me that based on the derogatory information and factual claims  
18 presented about BENCHMARK on that website, such as that suicide attempts were common, that  
19 BENCHMARK had committed fraud, that BENCHMARK lied to parents, and that BENCHMARK  
20 falsely made it appear as if it were accredited, the parent would not even consider BENCHMARK as  
21 a possible placement for their child. The parents also referred to the fact that the “Benchmark Young  
22 Adult School EXPOSED” website was confusingly similar to the real BENCHMARK website.

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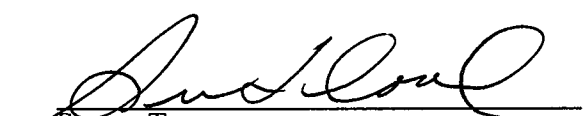
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8. The parents with whom I spoke had clearly been influenced by the statements contained on the website and had understood those statements to be making factual claims regarding BENCHMARK and its staff and program.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on July 9, 2008 in Scottsdale, Arizona.

  
SUSAN TRUEBLOOD