

1 J. Douglas Kirk - SBN 125808
KIRK & TOBERTY, LLP
2 Attorneys at Law
2201 Dupont Drive, Suite 820
3 Irvine, California 92612
(949) 851-0355 • FAX (949) 851-1250

Coy FILED-Central District
SUPERIOR COURT
SAN BERNARDINO COUNTY

JUL 15 2008

4 Ward J. Lott - SBN 211307
5 CALL, JENSEN & FERRELL
A Professional Corporation
6 610 Newport Center Drive, Suite 700
Newport Beach, CA 92660
7 (949) 717-3000

By *Stephanie Chandler*
Deputy

8 Attorneys for Plaintiffs
BENCHMARK YOUNG ADULT SCHOOL, INC.
9 AND JAYNE LONGNECKER

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

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COUNTY OF SAN BERNARDINO, CENTRAL CIVIL DISTRICT

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15 BENCHARK YOUNG ADULT SCHOOL,)
INC., a California corporation; and JAYNE)
16 LONGNECKER, an individual,)

CASE NO.: CIVSS 803920

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Plaintiff,

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

18

19

v.

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21 MICHAEL CRAWFORD, an individual; and
DOES 1 through 50, inclusive,

22

Defendant.

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25 I, Ronnie Armendarez, declare as follows:

26 1. I am an employee of Plaintiff, Benchmark Young Adult School, Inc. ("BENCHMARK")

27 I make this declaration in support of Plaintiffs' Opposition To Special Motion To Strike Complaint

28 Pursuant To CCP §425.16. I have personal knowledge of, and if called as a witness to testify could and

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

BENCHARK YOUNG ADULT SCHOOL,)
INC., a California corporation; and JAYNE)
16 LONGNECKER, an individual,)

Plaintiff,

v.

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

Defendant.

CASE NO.: CIVSS 803920
DECLARATION OF RONNIE ARMENDAREZ IN
SUPPORT OF PLAINTIFFS' OPPOSITION TO
SPECIAL MOTION TO STRIKE COMPLAINT
PURSUANT TO CCP §425.16

I, Ronnie Armendarez, declare as follows:

1. I am an employee of Plaintiff, Benchmark Young Adult School, Inc. ("BENCHMARK")
- I make this declaration in support of Plaintiffs' Opposition To Special Motion To Strike Complaint Pursuant To CCP §425.16. I have personal knowledge of, and if called as a witness to testify could and

1 would testify to, the following facts:

2 2. I have been employed by BENCHMARK as a Resident Counselor/Life Coach for
3 approximately seven (7) years. In that capacity, my job duties include generally maintaining a healthy
4 environment for the BENCHMARK students.

5 3. BENCHMARK maintains a residential facility (“RESIDENTIAL PROPERTY”) for
6 BENCHMARK students on State Street in Redlands. For most of the BENCHMARK students, the
7 RESIDENTIAL PROPERTY is their home.

8 4. On Saturday, November 24, 2007, I was working at the RESIDENTIAL PROPERTY on
9 my regular weekend schedule. I noticed Michael Crawford (“CRAWFORD”) close to the
10 RESIDENTIAL PROPERTY. I knew who CRAWFORD was because he was a student at
11 BENCHMARK when I first began working there several years ago.

12 5. When I first noticed CRAWFORD, he was sitting in a vehicle parked on the street by the
13 RESIDENTIAL PROPERTY. I noticed that he was holding a video camera and appeared to be
14 videotaping BENCHMARK students and staff. I left him alone.

15 6. Over the next several days, CRAWFORD appeared every day at the RESIDENTIAL
16 PROPERTY. CRAWFORD would begin at 7 am and continue (taking breaks throughout the day
17 coinciding with the BENCHMARK schedule) until sometime after 9 pm. I personally saw and heard
18 the actions CRAWFORD took over the next several days as he prevented BENCHMARK from
19 conducting its day to day activities and interfered with BENCHMARK’s business, its relationship with
20 its students, and the entire structure of the BENCHMARK program. Although I was not personally
21 present earlier in the week, my understanding is that CRAWFORD began his activities on the
22 Wednesday, November 21, 2007, the day prior to Thanksgiving.

23 7. During this time, CRAWFORD engaging in numerous activities that were extremely
24 disruptive to the BENCHMARK students and staff and the entire structure of the BENCHMARK
25 program. He was using a handheld video camera to record the students and staff without their
26 permission. He was also constantly yelling derogatory statements about BENCHMARK, including
27 yelling out that “The BENCHMARK program is a bunch of bullshit”, and heckling students.

28 8. CRAWFORD was also actively soliciting BENCHMARK students to immediately leave

1 14. CRAWFORD began exhibiting anger towards me, making comments to me such as “You are
2 full of shit.”, “You are brainwashing kids”, “the program is full of shit”. Several of the students began
3 to approach CRAWFORD. Out of respect for the students and program, I began to encourage the
4 students to stay calm in the face of CRAWFORD’s provocations. I asked them to stop and go back
5 inside I directed those students to the back of the RESIDENTIAL PROPERTY. The students left the
6 area. CRAWFORD continued yelling obscenities at me.

7 15. Later that afternoon, I saw that CRAWFORD was now walking onto the RESIDENTIAL
8 PROPERTY and accosting students. I watched as CRAWFORD attempted to force a student to accept
9 papers CRAWFORD had on brain washing from the Third Reich era. The student said he did not want
10 the material. CRAWFORD then told the student that BENCHMARK was “brainwashing” him, and
11 that BENCHMARK was a “cult”. I watch as he approached and attempted to hand him some written
12 material.

13 16. I approached CRAWFORD and told him he had to move off the RESIDENTIAL PROPERTY.
14 After he did so, I went back inside.

15 17. He returned to the RESIDENTIAL PROPERTY at approximately 6:30 pm, this time with a
16 third person. CRAWFORD now became extremely aggressive, yelling at students “get me a staff
17 member”, “I want his stuff”, “he is with me”, “I want all of his stuff or I am calling the cops”. I had no
18 idea what he was referring to, so I asked him if he was ok. CRAWFORD now said that one of the
19 BENCHMARK students had decided to go with him. I saw for the first time that one of the people with
20 CRAWFORD was a BENCHMARK student named “Marcos”.

21 18. I walked back inside and notified my supervisor, Sheri, of the situation. Sheri walked out and
22 asked what was happening. CRAWFORD immediately began screaming and shouting profanities at
23 Sheri.

24 19. Sheri attempted to have a conversation with CRAWFORD but CRAWFORD continued yelling
25 obscenities at her and would not allow her to talk. The police were again contacted and came to the
26 RESIDENTIAL PROPERTY.

27 20. The police discussed the situation with CRAWFORD and Sheri and advised CRAWFORD that
28 he should leave. CRAWFORD did eventually leave.

1 the BENCHMARK program. As an example, CRAWFORD repeatedly yelled that he would pay any
2 student \$100.00 and provide them with a free airplane ticket to anywhere in the United States if they
3 would at that moment walk away from BENCHMARK.

4 9. After watching CRAWFORD's actions over several hours and observing the extent to
5 which he was causing a disruption to BENCHMARK'S operations and its students and staff, I felt that
6 things were getting out of control. I called the police. The police came and spoke to CRAWFORD.
7 They then told me that they had informed CRAWFORD that if he came onto BENCHMARK property
8 he would be committing a trespass.

9 10. I questioned the police officers and asked if it was okay for CRAWFORD to disturb the
10 peace. The police officer reiterated that if CRAWFORD came onto BENCHMARK property he was
11 committing trespass. Although I believed that CRAWFORD was seriously disrupting BENCHMARK
12 with his activities, I did not take any further action at this time. CRAWFORD maintained his presence
13 at BENCHMARK throughout November 24, 2007 until at least when I left my shift, at 7 pm.

14 11. On November 25, 2007, I again began my shift at the RESIDENTIAL PROPERTY at 7
15 am. CRAWFORD again showed up at the RESIDENTIAL PROPERTY at around 7:00 am with a video
16 camera in his hand. He again began harassing students, this time more aggressively confronting them
17 as they walked by.

18 12. I observed that the BENCHMARK students were also becoming increasingly frustrated
19 with CRAWFORD'S actions. CRAWFORD continued making comments that "Benchmark is
20 brainwashing you", and "come with me", to the BENCHMARK students. Since CRAWFORD appeared
21 to be seeking to escalate the conflict he was creating, I called the police for the second time. The police
22 again informed me that if CRAWFORD came onto BENCHMARK property he was committing
23 trespass.

24 13. After the police left for the second time, CRAWFORD now specifically began targeting me
25 as well as the students. CRAWFORD followed me to where a few students were off property. He
26 videotaped and photographed us. As he did this, I advised the students that if they did not want
27 CRAWFORD to video tape them, they should go to the back of the RESIDENTIAL PROPERTY where
28 CRAWFORD did not have access.

1 21. Later that same night I received a telephone call from a different BENCHMARK student who
2 lives independently. He advised me that he needed my help because CRAWFORD was at his residence
3 trying to coerce him to immediately leave the BENCHMARK program. The student told me that
4 CRAWFORD was offering him money and a plane ticket to immediately leave the program and that he
5 wanted CRAWFORD to leave him alone.

6 22. As I arrived at the student's residence, I saw that CRAWFORD was there. The student told
7 CRAWFORD that he had made a mistake in speaking to CRAWFORD. He then asked me to take him
8 away from CRAWFORD. The student told CRAWFORD that BENCHMARK had done nothing but
9 help him and that CRAWFORD should just leave.

10 23. Hearing that the student wanted him to leave, CRAWFORD appeared to completely lose
11 control. He began screaming at me and flailing his arms wildly. He brought his face to within three (3)
12 inches of my face, and screamed that I was "bitch". He continued screaming profanities at me, including
13 that I was "a fucking ass hole" and a "brain washing fuck head".

14 24. CRAWFORD caused such an uproar that it attracted the attention of the manager of the
15 location. As the manager approached, CRAWFORD noticed that the manager approaching and
16 immediately switched his behavior and language, stopped using profanity and resumed a normal
17 demeanor.

18 25. I walked away from CRAWFORD and did not have any further contact with him.

19 26. The following day, November 26, 2007, CRAWFORD appeared at the BENCHMARK
20 Educational Center ("ED CENTER") on Essex Court in Redlands. The ED CENTER is the heart of the
21 BENCHMARK program, where students participate in daily activities, including attending group
22 sessions and meeting with their primary counselors.

23 27. I noticed CRAWFORD when I came to work at approximately 1 pm at the ED CENTER.
24 CRAWFORD appeared intent on causing as serious a disturbance as possible. CRAWFORD began
25 taking photographs of students and staff. We left him alone. He eventually left the ED CENTER.

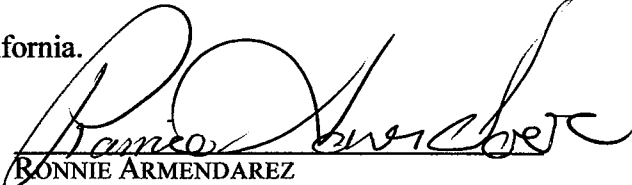
26 28. At approximately 5:30 pm, CRAWFORD appeared back at the RESIDENTIAL PROPERTY
27 with a video camera and tripod. CRAWFORD resumed the videotaping and heckling of staff and
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students. After approximately one (1) hour, CRAWFORD left.

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

Executed on July , 2008 in Redlands, California.



RONNIE ARMENDAREZ

7-14-08