

Original

CHRIS STAMPS #115174
Arizona State Prison-Eyman
Ryrning Unit, 4-C-102
P.O. Box 3100
Florence, Arizona 85232-3100

19

In Propria Persona.

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY PINAL

CHRIS STAMPS,)
)
 Plaintiff,)
)
 -VS-)
)
 NARCONON DRUG REHAB, and,)
 JEANNE TRAHANT,)
)
 Defendant.)
 _____)

No. CV-95043320

COMPLAINT

Case offered

WILLIAM J. GIBSON
WJG

COMES NOW, the Plaintiff, CHRIS STAMPS, in propria
persona, in the above entitled action, and does hereby set
forth the Complaint against the above named Defendant(s) pur-
suant to Rule 2 and 3, Arizona Rules of Civil Procedure;
Article VI, Section 14 and 22, Arizona State Constitution;
and A.R.S. § 12-122 and § 12-123.

For the Superior Court has inherent power to control
it's own process. Wiesel V. Ashcraft, 26 Ariz. App. 490, 549
P.2d 585 (1976). A " Civil Action " Wenk V. Horizon Moving
and Storage Co., 131 Ariz. 131, 639 P.2d 321 (1982), is
commenced by filing a complaint with the Court. Robinson V.
Waterman S.S. Co., 7 F.R.D. 51 (D.C.N.J. 1947). Murphey V.
Valenzuela, 95 Ariz. 30, 386 P.2d 78 (1963).

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I.

This Court maintains full jurisdiction over this matter. Under Article VI, Section 14 and 23, Arizona State Constitution, the Superior Court is afforded with inherent power over Civil cases. Goodman V. Gordon, 103 Ariz. 538, 447 P.2d 230 (1968).

The Arizona Revised Statutes (A.R.S.) § 12-121 et,seq.; § 12-122 and §12-123, the Superior Court holds absolute and original jurisdiction and power over these matters. Kemble V. Stanford, 86 Ariz. 392, 347 P.2d 28 (1960) and Industrial Park V. U.S.I.F. Palo Verde Corp., 19 Ariz. App. 342, 507 P.2d 681 (1973).

The Arizona Superior Court, by virtue of its Constitutional powers, has thus set forth Rule 1, Arizona Rules of Civil Procedure, which states;

" These rules govern the procedure in the Superior Courts of Arizona in all suits of Civil nature whether cognizable as a case at law or equity. They shall be construed to secure the just, speedy, and impulsive determination of every action".

and thus, are mandatory in their nature, this Court holds absolute jurisdiction to hear and determine this matter. Ferguson V. Goff, 46 Ariz. 260, 50 P.2d 20 (1935).

II.

Venue is applicable pursuant to A.R.S. § 12-401, as the Plaintiff residence is located within the County of Pinal, at P.O.Box 3100 Florence, Arizona 85232, and the Defendant(s), resides in the State of California, at 3429 W. Olympic Ave.

III.
FACTS APPLICABLE

- A.) The Plaintiff, Chris Stamps # 115174, entered into a contract with the Narcon Drug Rehabilitation Center on or about the 20th day of October, 1994, in and through a paid agreement with Laura Mazurek,
- B.) The Plaintiff, Chris Stamps, obtained a pass from the Center on or about the 5th day of December, 1994, to transport himself to the city of Tucson, Arizona, to see the birth of his son,
- C.) The Plaintiff, Chris Stamps, returned on or about the 14th day of December, 1994, to the Narcon Drug Rehabilitation Center,
- D.) The Plaintiff, Chris Stamps, returned to Tucson on or about the 17th day of December, 1994, pursuant to an agreement with the Defendant's coordinator (Jeanne Trahant) to be allowed to spend a few days with his girlfriend and new-born son, this agreement was made in person between the Defendant and the Plaintiff, verbally, no return date was demanded,
- E.) The Plaintiff, Chris Stamps, Telephonically told the Defendant on the 22nd day of December, 1994, that he would be returning on the 23rd day of December, 1994,
- F.) On the same said date the Defendant told the Plaintiff, that it would do no good to return, that he was no longer welcome at the Narcon Drug Rehabilitation Center, said statement was made by the coordinator, Jeanne Trahant,
- G.) The Plaintiff, Chris Stamps, being under the verbal agree-

ment, had left all of his personal property within the housing department of the Narcon Drug Rehabilitation Center, under the direct care of the coordinator Jeanne Trahant,

H.) The Plaintiff, Chris Stamps, was told by Jeanne Trahant, that all his property would be put into storage, not to worry it would be safe, she personally guaranteed that she personally would send the property through the mail/ U.P.S., to the Plaintiff, emphasis added,

I.) The Plaintiff, Chris Stamps, through-out the next (30) days attempted to contact the Defendant(s) without success, messages were left with the receptionist, from December, January, and February, for the coordinator to contact the Plaintiff, the coordinator Jeanne Trahant did not bother to return any calls,

J.) The Plaintiff's Mother, Laura Mazurek, and the Plaintiff's girlfriend, Peggy Lahey, the Plaintiff's brother, Todd Stamps, and the Plaintiff's brother's girlfriend, Kelly Morgan, all repeatedly attempted to contact the defendant Jeanne Trahant, to obtain information on how to obtain the Plaintiff's personal property from the Rehabilitation Center,

K.) The Defendant never even bothered to return any of the calls, to any of the persons named supra,

L. During the month of FEBRUARY, 1995, the Plaintiff, Chris Stamps, was in fact able to contact the Defendant, in person, and she told the Plaintiff that;" My personal items (Property) was in fact in storage and would be fine " further that;" She was too busy to worry about my property at that time but she would see that it was mailed to me",

IV.
STATEMENT OF CLAIM
AGAINST JEANNE TRAHANT.

- 1.) The Plaintiff reasserts the facts set forth in (A through L) as all true and correct to the very best of his personal knowledge,
- 2.) That the Defendant knowingly, intentionally, and deliberately, (with malice forthought) destroyed, donated, or removed the Plaintiffs personal property to an unknown designation, without the Plaintiffs consent,
- 3.) That the Defendant knowing that the Plaintiff had personal irreplaceable items, that she intentionally kept/sold/or destroyed, such as photographs,
- 3.) That the Defendant through her employment, knowingly, and intentionally, told the Plaintiff fraudulent statements about the storage of said personal items, that at no time after the 17th day of December, 1994, did she in fact intend to return the Plaintiffs personal property,
- 4.) That the Defendant through her employment, knowingly, and deliberately, told the Plaintiff's family fraudulent statements about the storage of said items, never intending to return any of their calls, inasmuch, keeping them from obtaining the property,
- 5.) That the Defendants acts, actions, or omissions, directly or indirectly denied the Plaintiff his right to obtain his personal property, thus, caused irrefutable damages to said Plaintiff,
- 6.) That the Defendant had absolutely no authority through her

individual personal capacity, or her official capacity as a coordinator for the Narcon Drug Rehabilitation Center, to remove, destroy, donate, sell, give, trade, or otherwise transfer the Plaintiffs personal belongings, without first giving the Plaintiff personal notice, and proper time to reply, and obtain his property through normal means,

v.

WHEREFORE the Plaintiff prays for judgement against the Defendant in his first statement of claim as follows:

- 1.) That the Defendant, Jeanne Trahant, be required to pay the Plaintiff a Sub-Total of \$ 4,071.00, Four Thousand Seventy-One Dollars, and no cents, in actual damages;
- 2.) That the Defendant be required to pay the Plaintiff a Sub-Total of \$ 12,213.00 in Treble damages; Twelve Thousand Two Hundred and Thirteen dollars, no cents;
- 4.) That the Defendant be required to pay the Plaintiff, a Total of \$ 100,000.00 in compensatory and/or punitive damages, One Hundred Thousand Dollars, and no cents, for the intentional deliberate mental stress, duress, and harassment she knowingly inflicted upon the Plaintiff,
- 5,) That the amounts of monetary damages be paid in cash, in either installments or in full at or before Trial,
- 6.) That all the amounts requested are not, and do not include the amount for the loss of the personal sentimental value of the Photographs, this amount is specifically requested to be decided by the Jury,

7.) That a Jury be convened to decide all amounts of Monetary damages including (6) six supra,

3.) That the Defendant be required to pay any and all Court costs, attorney fee's, and service fees consequentially incurred,

VI.

JURY DEMAND

The Plaintiff request a Jury to be sworn and impaneled pursuant to Arizona Rules of Civil Procedure, Rule 38 Et.Seq. to all issues not resolved at the time of Trial, if this matter should go to Trial,

VII.

**SECOND CLAIM FOR JUDGEMENT
AGAINST, NARCONON DRUG REHABILITATION.**

1.) That the Plaintiff, Chris Stamps, entered into in good faith, a contract agreement, that was breached by Narconon Drug Rehabilitation directly,

2.) That in and through the direct or indirect employment responsibility, of named employee supra, the Center breached the Trust, Agreement, and terms of said contract,

3.) That through the direct or indirect acts, actions, or omissions, the Center breached the Contract, with the Plaintiff,

4.) That through this duty, trust, agreement, and responsibility, the Narconon Drug Rehabilitation Center breached the contract directly or indirectly attached as a second party, to the property loss,

5.) That the Center had no authority to authorize the removal

of said property,

6.) That the Defendant directly or indirectly had knowledge of the breach of the contract and failed to inform the Plaintiff of the breach, inasmuch as are now accountable for the acts, actions, or omissions of their said employee,

7.) That through the employment of said named employee the unlawful removal, donation, theft, sale, or transfer of the Plaintiff's personal property to an un-named designation, is now also directly or indirectly attachably linked as the second named party,

VIII.

WHEREFORE the Plaintiff prays for judgement against the Defendant in this second statement of claim as follows:

- 1.) That the Defendant, Narconon Drug Rehab.Center, pay the Plaintiff, a total of \$ 100,000.00 in compensatory and/or punitive damages for the acts, actions, or omissions of their said employee, within the breach of the contract,
- 2.) That the Defendant, Narconon Drug Rehab.Center, pay the Plaintiff, a total of \$ 50,000.00 in actual damages,
- 3.) That the Defendant, Narconon Drug Rehab.Center, pay for any and all Court costs, attorney fee's, and service fees consequentially incurred,
- 4.) That all monetary amounts be paid in cash, in either installments or in full, at or before Trial,
- 5.) That all the amounts requested, are not, and do not, include the amount for the loss of the personal sentimental value of

the Photographs, this amount of monetary damages is specifically requested to be decided by the Jury,

IX.

SECOND JURY DEMAND

The Plaintiff request a Jury to be sworn and impaneled pursuant to the Arizona Rules of Civil Procedure, Rule 38 Et.Seq. to all issues not resolved at the time of Trial, if this matter should go to Trial,

X.

WHEREFORE the Plaintiff prays for judgement against the Defendant(s), excluding the Photographs, as follows:

- 1.) Jointly a Total of \$ 54,213.00 in actual damages to be paid to the Plaintiff, Chris Stamps # 115174, being housed at P.O.Box 3100 Florence, Arizona 85232,
- 2.) Jointly \$ 200,000.00 in compensatory and/or punitive damages to be paid to the Plaintiff, supra,
- 3.) Separately Jeanne Trahan, \$ 12,213.00 in Treble damages, to be paid to the Plaintiff, supra,
- 4.) Jointly both Defendant(s) are specifically requested to be held accountable for the loss of the Photographs, a Total monetary amount, to be set by the Jury, to be paid to the Plaintiff, above and beyond all other monetary amounts.

RESPECTFULLY SUBMITTED this 20 day of November, 1995.

BY: Chris Stamps
CHRIS STAMPS # 115174
Plaintiff/Pro-Per.
P.O.Box 3100
Florence, Arizona 85232

ITEMIZED LISTED ITEMS

Tennis Shoes; 1pr., \$ 40.00	\$ 40.00
Boots ; 1pr., \$ 50.00	\$ 50.00
Levis Jeans ; 9pr., \$ 30.00	\$ 270.00
Dress Pants ; 8pr., \$ 40.00	\$ 320.00
T. Shirts ; 50 ., \$ 20.00	\$ 1000.00
Dress Shirts; 10 ., \$ 30.00	\$ 300.00
Sweaters ; 4 ., \$ 40.00	\$ 160.00
Flannels ; 30 ., \$ 40.00	\$ 1200.00
Jacket ; 2 ., \$ 50.00	\$ 100.00
Dress Socks ; 8 ., \$ 2.00	\$ 12.00
Sport Socks ; 12 ., \$ 1.00	\$ 12.00
Boxers ; 6 ., \$ 2.00	\$ 12.00
Underwear ; 10 ., \$ 1.50	\$ 15.00
Belts ; 2 ., \$ 20.00	\$ 40.00

Sub-Total \$ 3,531.00

Music Tapes ; 60 ., \$ 8.00 \$ 480.00

Picture Albums: 4., \$15.00 \$ 60.00

Pictures Boxes full/ Undetermined value.

Sub-Total \$ 540.00

Total \$ 4,071.00

William W. Holder
SKARECKY, CALES & HOLDER, P.A.
3130 North Third Avenue, #300
Phoenix, Arizona 85013
(602) 248-0393
State Bar No. 009478
Attorneys for Defendant

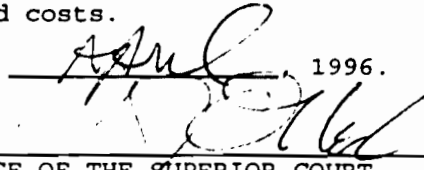
IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
PINAL COUNTY, ARIZONA

CHRIS STAMPS,)	
Plaintiff,)	No. CV95-043320
v.)	
)	ORDER
JEANNE TRAHANT; NARCONON REHAB)	
(LOS ANGELES),)	
Defendants.)	(Assigned to Honorable William J. O'Neil)


The defendants having filed a Motion to Dismiss, the plaintiff having failed to respond thereto, and good cause appearing;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, that the above-captioned matter is dismissed with prejudice, each party to bear their own attorney's fees and costs.

DATED this 18 day of April, 1996.



JUDGE OF THE SUPERIOR COURT


910 349

William W. Holder
SKARECKY, CALES & HOLDER, P.A.
3130 North Third Avenue, #300
Phoenix, Arizona 85013
(602) 248-0393
State Bar No. 009478
Attorneys for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
PINAL COUNTY, ARIZONA

CHRIS STAMPS,)	
Plaintiff,)	No. CV95-043320
v.)	
)	DEFENDANTS' MOTION TO
JEANNE TRAHANT; NARCONON REHAB)	DISMISS
(LOS ANGELES),)	
)	(Assigned to Honorable
Defendants.)	William J. O'Neil)
_____)	4/15 pd 510 # 215

Defendants JEANNE TRAHANT and NARCONON LOS ANGELES, incorrectly named in the complaint as NARCONON REHAB (LOS ANGELES), by their undersigned counsel and pursuant to Rule 12(b), A.R.C.P., hereby move this Court for an order dismissing the above-captioned matter with prejudice. This motion is supported by the attached Memorandum of Points and Authorities.

DATED this 7th day of March, 1996.

SKARECKY, CALES & HOLDER, P.A.

By William W. Holder
WILLIAM W. HOLDER 009478
3130 North Third Avenue, #300
Phoenix, Arizona 85013
Attorneys for Plaintiff

MEMORANDUM OF POINTS AND AUTHORITIES

I. THE COMPLAINT SHOULD BE DISMISSED FOR LACK OF PERSONAL JURISDICTION OVER THE DEFENDANTS.

Rule 12(b)(2), A.R.C.P., authorizes dismissal of an action for lack of jurisdiction over the person. Here, as more

fully set forth in the attached Affidavit of JEANNE TRAHANT, neither defendant has the required minimum contacts with the State of Arizona.

JEANNE TRAHANT is the Executive Director of NARCONON LOS ANGELES, which is a drug rehabilitation program located in Los Angeles, California. The plaintiff was enrolled in the program in Los Angeles in 1994 and, because of violations of the rules of the program, was dismissed while he was on a leave of absence in Arizona. Since then, plaintiff has been incarcerated in the State of Arizona and is now so incarcerated. In short, the only contact between any of the parties to this lawsuit, and the State of Arizona, is the fact that the plaintiff has come to Arizona since the events described in the complaint, and is now located in Arizona.

The complaint should be dismissed pursuant to Rule 12(b)(2) because it does not allege any basis for personal jurisdiction over either of the defendants.

II. THE COMPLAINT SHOULD BE DISMISSED FOR INSUFFICIENCY OF SERVICE OF PROCESS.

The only attempt at service of process that has been made here was pursuant to Rule 4.1(c), A.R.C.P., which authorizes service by first-class mail with a notice and acknowledgement of receipt addressed to the sender. Here, the two defendants did receive one copy each of the complaint, by first-class mail. However, neither defendant has signed the acknowledgement of service or returned it to the plaintiff. See Affidavit of JEANNE TRAHANT, attached hereto.

Because there has been no sufficient service of process

of the summons and complaint, the complaint should be dismissed pursuant to Rule 12(b)(5), A.R.C.P.

III. THE COMPLAINT SHOULD BE DISMISSED FOR FAILURE TO STATE A CLAIM.

Rule 12(b)(6), authorizes dismissal of a complaint for failure to state a claim. As more fully set forth in the Affidavit of JEANNE TRAHANT, and based on the receipt dated February 7, 1996, attached hereto, plaintiff's complaint is moot. His clothing has been returned to his brother Todd A. Stamps and the brother has signed a receipt for it. Because the complaint is moot, the complaint fails to state a claim and should be dismissed pursuant to Rule 12(b)(6), A.R.C.P.

IV. CONCLUSION.

For any or all of the reasons set forth above, this Court should grant the motion of defendants to dismiss the above-captioned complaint with prejudice.

DATED this 7th day of March, 1996.

SKARECKY, CALES & HOLDER, P.A.

By William W. Holder
WILLIAM W. HOLDER 009478
3130 North Third Avenue, #300
Phoenix, Arizona 85013
Attorneys for Plaintiff

COPY of the foregoing
~~hand-delivered~~ mailed this 8th day of
March, 1996, to:

Honorable William J. O'Neil
PINAL COUNTY SUPERIOR COURT
P.O. Box 889
Florence, Arizona 85232-0889

MEMORANDUM OF POINTS AND AUTHORATIES

I) LACK OF PERSONAL JURISDICTION:

The Defendant's, in their Motion to Dismiss and Reply in Support, have alledged this Court does not have Personal Jurisdiction over either of the Defendant's, for Lack of Minimal Contact.

The facts surrounding this issue are simple, the Plaintiff was an Arizona resident at the time a verbal contract was made over the telephone, between the Defendant's and Plaintiff/Plaintiff's Family.

The Plaintiff's mother, Laura Mazurek, as a result of this verbal contract, sent a large sum of money to the Defendants, from Arizona, see Supporting Affidavit of Laura Mazurek, ¶ B, Ex. A herein.

Furthermore, Plaintiff was in Arizona, on a temporary leave from Narconin to see the birth of his son when the Defendant's reneged on their contract and fraudulently terminated the Plaintiff from the treatment program, without providing any form of refund, and additionally without returning any of the Plaintiff's personal property to him.

It should be noted that not only was this temporary leave to Arizona approved by the Defendants, but it also places the Plaintiff in Arizona at the time he was defrauded by the Defendants, see Supporting Affidavit's of Laura Mazurek, ¶ C, D AND E, Ex. A herein, and Peggy Lahey, ¶ D, Ex. B herein.

The Plaintiff maintains that given the fact that he was in Arizona at the time the agreement was made, and at the time the agreement was broken by the Defendant's, that these two points are more than enough to establish Minimal Contact and Personal Jurisdiction for this Court.

II) INSUFFICIENCY OF SERVICE:

It appears that the Defendant's hope to have this complaint dismissed based upon their refusal to sign and return the acknowledgment of service, although they clearly admit that they both received copies, refer to Defendant's Motion to Dismiss, pg. 2, §2, and attached Affidavit of Jeanne Trahant.

The Plaintiff has complied with (A.R.C.P.) Rule 4.2(c), to the best of his ability, however, he has been unable to complete the process due to Defendant's refusal to sign.

In any event, Service has been made, and the Defendant's have admitted to having received copies of the Complaint, under Oath.

III) FAILURE TO STATE A CLAIM:

The Plaintiff has set forth claims upon which relief can be granted, in the following instances;

A) STATEMENT OF CLAIM AGAINST JEANNE TRAHANT:

At pg. 5, ln. 1 through pg. 6, ln. 6 of Plaintiffs Complaint, he specifically sets forth claims against Defendant Trahant.

B) STATEMENT OF CLAIM AGAINST NARCONON DRUG REHAB.:

At pg. 7, ¶ 1 through pg. 8, ln. 10 of Plaintiffs Complaint, he specifically sets forth claims against Narconon Drug Rehab.

Conley v. Gibson, 355 U.S. 41, 78 S.Ct. 99 (1957),
"A complaint should not be dismissed for failure to state a claim unless it appears beyond a doubt that the Plaintiff can prove no set of facts in support of his claims which would entitle him to relief.", see also Schever v. Rhodes, 416 U.S. 232, 236, 94 S.Ct. 1683 (1974).

The Plaintiff has attached three (3) Affidavits in support of his claims and intends to use them, along with other evidence to support his arguments throughout the course of this action.

wherefore, Plaintiff Prays this Court will Deny Defendants Motion
to Dismiss in full.

Respectfully Submitted this 6 day of May, 1996.


CHRIS STAMPS, Pro-Per

Copy of the foregoing
mailed this 6 day of
May, 1996, To:

WILLIAM W. HOLDER
Attorney for Defendants
3130 North Third Ave., #300
Phoenix, Az. 85013

By: C.S.
CHRIS STAMPS, Pro-Per

STATE OF ARIZONA)
)
COUNTY OF PIMA) SS.

A F F I D A V I T

I, PEGGY LAHEY, being duly sworn upon oath and am otherwise competent to testify as to the facts in this Affidavit, that same said facts are true and correct to the very best of my personal knowledge.

- (A) That I am over the legal age of 21 years, competent to testify to the facts stated;
- (B) That I am Chris Stamps Girlfriend, and have personal knowledge to the fact that the items mailed to Chris from the Narconon Los Angeles Center, on the 7th day of February, 1996, were in fact NOT items that belonged to Chris;
- (C) That I was personally present when Todd Stamps received the package and further I was personally present when Todd opened the package;
- (D) That in June of 1995, I personally stopped by the Narconon Los Angeles Center to pick up Chris Stamps personal affects when I was on vacation in California, Jeanne Trahant personally told me that Chris Stamps personal items had been donated;
- (E) That I had previously called from Arizona, left a message number, with staff members, and then finally spoke to Jeanne she assured me that Chris Stamps personal affects would be mailed, this being prior to my visit while on vacation;
- (F) That I am a resident of the State of Arizona and reside at 101 N. JESSICA #133 TUCSON, AZ 85710
My Home phone no (520) 298 7978 Business no (520) 747 3775
- (G) That Chris Stamps came home to Arizona on leave to see his sons birth when he was told he could not return to Narconon Los Angeles Center.

Under penalty of perjury, I declare that I have

examined the above statements, made by me, and to the very best of my belief, each and all are true and correct.

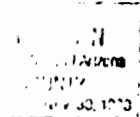
Further Affiant sayeth not.

Peggy Lahey
Affiant's Signature

SUBSCRIBED AND SWORN; to before me this 29 day of April, 1996.

11-3098
MY Commission Expires

Robert T. Curran
Notary Public



KRISTI YOUTSEY RUIZ, CLERK
PINAL COUNTY CLERK OF THE SUPERIOR COURT

DATE: 12-29-2004
TIME: 14:35:31 CHECK: CASH: CREDIT: CHANGE:
RECEIPT #: S 200266923 \$0.00 \$20.50 \$0.00 \$10.00
RECEIVED OF: CHRIS STAMPS MEMO:
BY CLERK: TAMMY S.

CASE NUMBER	EVENT/SERVICE	AMOUNT
S -1100 -CV -0095043320	906 COMPARISON/COPY FEE PER PAGE	\$10.50
STAMPS VS NARCONON DRUG REHAB		
PARTY: STAMPS CHRIS		
	TOTAL RECEIPT...	\$10.50

William W. Holder
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3130 North Third Avenue, #300
Phoenix, Arizona 85013
(602) 248-0393
State Bar No. 009478
Attorneys for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

PINAL COUNTY, ARIZONA

CHRIS STAMPS,)	
Plaintiff,)	No. CV95-043320
v.)	
JEANNE TRAHANT; NARCONON REHAB)	AFFIDAVIT OF JEANNE
(LOS ANGELES),)	TRAHAHNT
Defendants.)	
<hr/>		

STATE OF CALIFORNIA)
) ss.
County of Los Angeles)

1. I am over the age of eighteen and otherwise competent to testify in a court of law in the State of Arizona. I make this affidavit based on my own personal knowledge and free from duress or undue influence of any kind.

2. I am the executive director of Narconon Los Angeles. Narconon Los Angeles is a dba of Narconon International, which itself is a licensee of Able International ("Association for Better Living and Education.") As such, I am authorized to make this affidavit on behalf of myself individually and on behalf of Narconon Los Angeles, named in the complaint as NARCONON REHAB (LOS ANGELES).

3. Narconon Los Angeles and I have each received only one copy of the complaint in the above-captioned matter. They were both received by first-class mail. An acknowledgement of service

was contained in the envelope with the complaint, but neither I nor Narconon Los Angeles have signed any such acknowledgement.

4. CHRIS STAMPS was a student in Narconon's Drug Rehabilitation program in Los Angeles in 1994. He was a resident of California when he first enrolled in the program. Because of his repeated breaking of the rules of the program, he was dismissed from the program. He was on a leave of absence in Arizona when further information about his actions came to light and he was thereupon dismissed from the program. He left some of his personal belongings behind, in Los Angeles. Neither Narconon nor I have any contact with the State of Arizona, resulting from our relationship with CHRIS STAMPS, except for the fact that he chose to go to Arizona during a leave of absence during which he was dismissed from our California program.

5. Since the filing of the lawsuit, Narconon has returned the clothes which CHRIS STAMPS left at our facility in Los Angeles to his ~~mother~~ ^{Brother JT} in Arizona.

6. CHRIS STAMPS was dismissed from our program in December of 1994, and has no involvement in the program since then.

FURTHER AFFIANT SAYETH NAUGHT.

Jeanne Trahant
JEANNE TRAHANT

SUBSCRIBED AND SWORN TO before me this 16th day
of February, 1996.

3/3/98
Notary Expiration Date

Mary K. Meyer
NOTARY PUBLIC

