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11
12 *in pro per*

13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE DISTRICT OF ARIZONA
15

16 Kimberly R. Sweidy,
17 Plaintiff,

18 v.

19 Spring Ridge Academy, an Arizona
corporation, Jean Courtney,
20 Suzanne Courtney, Brandon Courtney,
Erin Smith, Leslie Filsinger,
21 Justin Zych, Kate Deily,
Veronica Borges

22 Defendants.
23
24

Case No. CV-21-08013-PCT-SPL

**DECLARATION OF
AMIEE YELINEK**

25 I, Amiee Yelinek, under penalty of perjury, hereby declare that I am a former Cross Creek
26 Manor and Adolescent Center For Change student. If called upon to testify as a witness, I
27 would and could competently testify, under penalty of perjury, to the following facts:

28 ///

1. I am Amiee Yelinek. I arrived at Cross Creek Manor (“CCM”) on November 10, 1991, seven days before my 16th birthday.

2. My grandparents paid for my program. My mother, who my grandparents disowned when I was nine, convinced my grandparents that if they didn’t pay for my program, I’d end up dead in the gutter.

3. I went to Provo Canyon School before CCM. I sent letters to my grandparents. Despite Utah laws mandating unrestricted and uncensored communications unless there exists a valid reason documented by the therapy team, my letters to my grandparents were being sent to my mother. That is how she learned that I was writing to my grandparents, and she didn’t like that.

4. CCM was owned by Robert (“Bob”) Lichfield, the man who later founded the Worldwide Association of Specialty Programs and Schools (“WWASPS”). Prior to founding CCM, Bob worked at Provo Canyon School, where Paris Hilton was reportedly later enrolled in 1997.

5. After eight months at CCM with no communication with the outside world, I finally got three letters mailed out through a staff member who was quitting. One of the three letters was to Child Welfare.

6. Bob removed me from Cross Creek because I sent those letters. He sent me to a detox center in Salt Lake City for two weeks, despite the fact that I was not intoxicated.

7. Bob then came to me and said, “What do you want to stop fucking with my program?”

8. Bob leased property down the street from CCM. It was a weird stucco building. It was called Adolescent Center For Change (“ACC”). And I wanted to be anywhere but CCM. CCM and ACC had the same owners, but the programs were not connected.

9. I made a deal with Bob Lichfield. I would stop making trouble and he would allow me to move down the street to ACC and attend the Brigham Young University (“BYU”) on-line home study program at my own pace, rather than the glacially slow pace at CCM. (It didn’t take me six weeks to read *The Outsiders*.)

1 10. The day I left CCM, Bob promised that I would never be sent back to CCM.

2 11. I went to ACC, which was normally a six week program, in July of 1992.

3 12. Maybe a couple of months later, Bob purchased yet another property, once a video
4 rental store, to be used as a “Rec Center.” It eventually became Cross Creek Academy.

5 13. The CCM girls and the ACC students were bussed to the Rec Center for seminars.

6 14. Jeannie Courtney ran the first seminar. She had bad vibes. She had no
7 qualifications. We were required to attend. There would be consequences if we refused.
8 And we had to repeat the seminar until we passed.

9 15. Because it was the first seminar, we didn’t know what to expect. In the seminar,
10 we were told, “If you don’t want to be here, there’s the door.”

11 16. But we had been told by counselors and other students that was not the case. We
12 were told it was mandatory. We had no choice.

13 17. It was long hours—ten to 12 hours. We were exhausted.

14 18. While in the seminar, we were given nothing to eat or drink, not even water. We
15 were discouraged from using the restroom until the scheduled break. We were promised
16 scheduled breaks, but they often didn’t materialize. For instance, we would be told that
17 we would have a break in 15 minutes. Then an hour passed.

18 19. I was a vegetarian. I basically ate lentils for two years. During the seminar, we
19 were given breakfast before the seminar. We had a lunch break and a dinner break.
20 Lunch was probably a sandwich. Overall, the food was not great. And we were
21 exhausted all the time.

22 20. The content of the first seminar conducted by Jeannie Courtney included a number
23 of activities. This was the first such seminar ever given at CCM.

24 21. There was the “Lifeboat” activity. We had to pick who lived and who died during
25 a catastrophe that involved a lifeboat without room to accommodate everyone. We
26 weren’t given all the options. When we tried to think outside the box, we were
27 discouraged. In the end, we found out that we were supposed to think outside the box.

28 22. Each person was given five minutes to present the reasons that we thought that we

1 should be saved. If we took the whole five minutes, we were “selfish.” If we did not take
2 the whole five minutes, we had “self-esteem issues.” We could not win.

3 23. There was the “Trust” activity. We were presented with a number of scenarios.
4 And we had to declare whether we trusted the other seminar participants in that particular
5 situation or scenario. For instance, did we trust the person to take our dog to the vet?
6 Bear in mind, we often didn’t even know the person we were supposed to trust or not
7 trust.

8 24. After going through a number of these scenarios, we were told, “Ultimately, none
9 of that matters. You either trust or you don’t trust.”

10 25. This was difficult for a lot of people, including me. I am not a “pleaser.” I don’t
11 need to tell people what they want to hear. Nevertheless, it’s very difficult and unpleasant
12 to look into the face of a person you don’t even know and tell that person that you don’t
13 trust them based on absolutely nothing.

14 26. Suddenly, the whole activity becomes about me “not trusting,” rather than
15 someone possibly being sketchy or even just an unknown.

16 27. We also engaged in hitting pillows while screaming, as well as beating walls while
17 screaming. This was called “purging.” After these two activities came to the attention of
18 Bob Lichfield, Jeannie Courtney was restricted from having the students engage in these
19 two particular activities. Future participants were not forced to “purge.”

20 28. I live on an island with about 11,000 people. Someone asked me to look into a
21 woman at the local Vashon Youth and Family Services Resource Center, Osha Miller,
22 also known as Osha Christianson. This woman worked at Diamond Ranch Academy, as
23 indicated on her LinkedIn profile, from Jul 2007 - Feb 2009 as a “Special Education Para
24 Professional” and from Feb 2013 - Jul 2013 as an “Art Teacher.”

25 29. Diamond Ranch Academy is a TTI school in Utah with many on-line allegations of
26 abuse, spanning two decades, as well as a recent (filed December 30, 2022) parental
27 lawsuit by Dean Goodridge for the death of his daughter Taylor (Utah District Court,
28 Central Division: Case 4:22-cv-00102-DN). Mr. Goodridge’s Complaint alleges, “Upon

1 information and belief, Taylor died of sepsis related to her several weeks of complaints to
2 the staff.”

3 30. Ms. Christianson worked at Diamond Ranch Academy. And she has found her
4 way into our little local community of Vashon, where she again has access to vulnerable
5 parents and children, who are at risk for being persuaded by her that the “solution” to the
6 challenges they are experiencing can be remedied by sending their child away to a school
7 in the TTI. The public has no way of knowing what types of referral programs and what
8 types of kickbacks, if any, are utilized in the TTI.

9 31. I now return to the seminars that I attended decades ago. There were three total.
10 They were given weeks apart, if my memory serves, but it seemed longer at the time. The
11 CCM program was six months in length, the ACC program was six weeks in length, and
12 the seminars contained the same students, so I don’t think the spacing could have been
13 more than a few weeks.

14 32. As described above, the first one was conducted by Jeannie Courtney. The second
15 one was conducted by David Gilcrease, her ex-husband. The third one was conducted by
16 both of them, together.

17 33. I don’t remember much about the second seminar with David Gilcrease, except a
18 “Pop,” as described below. At the time, I didn’t know they had a name for what they
19 were intentionally doing to us.

20 34. I also remember that we were forced “out of our comfort zone” by performing in
21 front of the group. Ron Kleinman performed to Garth Brooks. Ron, who looked like
22 Bob’s Big Boy, went back to the facility to prepare to be Garth Brooks.

23 35. I was a Pointer Sister, along with two Native American girls (see below regarding
24 how the Native American girls arrived at the facility). It was not unnoticed by the
25 participants that they were being assigned roles that were the opposite of what we were in
26 real life.

27 36. After each person or group performed, if our audience of other participants stood
28 up, that meant we were “giving it our all.” If they didn’t stand, we weren’t “giving it our

1 all.”

2 37. At some point in the seminar, we were also required to perform to “The Impossible
3 Dream.”

4 38. I do remember that the third seminar was not as taxing as the first two. Jeannie
5 Courtney and David Gilcrease attempted to build us back up. They started telling us our
6 strengths. I was told that I was a Monkey and not a Butterfly. I don’t remember what
7 either of those terms meant.

8 39. The staff members of CCM and ACC were forced to participate in the seminars,
9 and that did not go over well.

10 40. While I was at CCM and ACC, there were complaints about a staff member named
11 Tom abusing a student named Ron Kleinman. Tom repeatedly denied the allegations
12 prior to the seminars. At the “Seminar Graduation,” Tom apologized to Ron, but there
13 were never any consequences for Tom’s abusive behavior and Tom’s repeatedly lying
14 about his abusive behavior.

15 41. I was eventually allowed to attend Hurricane High School next to La Verkin. I got
16 special privileges because I was a trouble maker who reported the abuse in the letters that
17 were smuggled out and sent. My high school diploma is from the BYU Home Study
18 program, because BYU contracted with various campuses, including Hurricane High
19 School. Technically I have a diploma and a GED, the latter obtained when I applied to
20 Dixie State University (now Utah Tech University).

21 42. Because I had graduated high school, they could not keep me until I turned 18.

22 43. Prior to the seminars, Jack Williams, who previously worked for Provo Canyon
23 School, as did Bob Lichfield, showed up to ACC with a truckload of Native American
24 children. Those Native American children stayed at ACC long enough to attend two of
25 the seminars. Those Native American children also spent time at Cinnamon Hills.

26 44. Those Native American children came from different reservations. They were
27 forced to cut their hair, which was very traumatic for them. A fair portion of them are
28 now dead. I have found a number of them on Facebook.

1 45. After I left the program, I returned to staff one day of a seminar. There was a girl
2 from my hometown who had been sent to CCM, and in the back of my mind, I thought
3 that I could help her by staffing the seminar. I only staffed the seminar for one day,
4 because I learned that I was pregnant.

5 46. During that one day of staffing, I learned about "Do A Pop." Doing A Pop was
6 pushing a seminar participant until the participant "lost their mind." The shorthand for
7 this was "Pop." I was told, "We're going to Do A Pop after lunch." It was described as
8 "explode" and "let it all out." I never heard this term when participating. I only heard it
9 that one day of staffing.

10 47. During a Pop, low music was playing. It was Wilson Phillips. To this day, I cannot
11 listen to Wilson Phillips.

12 48. Participants were told, "Your Dad doesn't love you, tell him how you feel about
13 that." Participants were provoked and instigated until they "lost it."

14 49. Seventy five to ninety percent of the students there had been sexually violated in
15 some manner. I, fortunately, had not been. For many, memories of Dad were very
16 volatile.

17 50. This was followed by victim blaming and shaming. It was crazy making.

18 51. There were Groups where we were instructed to tell other participants what we
19 thought about them. It was called, "Feedback." It was abusive.

20 52. Bob Lichfield kept his promise never to send me back to CCM. The day I left
21 ACC for Dixie State University, Bob Lichfield sent all the remaining girls at ACC to
22 CCM, and ACC became an all boys facility.

23 53. That didn't last long. Bob Lichfield purchased a program in Samoa called
24 Paradise Cove. The ACC building was phased out, until only a handful of boys remained.
25 After all, it was only ever intended to be a six-week program. The boys were moved to
26 Transition House behind CCM. (Transition House originally had the high level girls.)

27 54. My brother, Chaz, attended two seminars. But my mother was not willing to send
28 my brother to Samoa.

1 55. On January 4, 2010, I was in Las Vegas with my daughter, who was 17 at the time,
2 visiting family. We had some time to kill, so we decided to take a trip to Utah.

3 56. My daughter, always up for an adventure, agreed to visit Cross Creek Academy
4 where she would pretend to be a potential student. She lied and said that she'd been
5 living with her father and that he wanted to send her away. She said that she and I had
6 decided that "the devil you know is better than the devil you don't," and she was looking
7 into Cross Creek Academy.

8 57. My daughter really threw herself into the role, including headphones, eyeliner, and
9 glaring stares.

10 58. Cross Creek Academy was the revamped Rec Center, housing boys and girls. Karr
11 Farnsworth, who previously worked at Provo Canyon School and who previously
12 "kidnapped" me and took me to Provo Canyon School, was the Director of Cross Creek
13 Academy.

14 59. In 2010, Karr was not as imposing as he once was (to a teenager).

15 60. While at Cross Creek Academy, my daughter and I asked to speak to some of the
16 girls. We were placed in a room with five or six girls, of different statuses. From Cross
17 Creek Academy's perspective, this would also insure that if a Level One girl revealed too
18 much, the Level Six girl could tattle on her.

19 61. I asked the girls if they went to the seminars. I also slipped in a comment about
20 the Statute of Limitations on Child Abuse.

21 62. As I was leaving, one of the girls came up to me and asked if she could give me a
22 hug. While hugging me, she whispered in my ear, "I'm a Butterfly."

23 63. Given the strict instructions that we were never supposed to talk about what
24 happened in those seminars, she was taking quite a risk.

25 64. This drove me to tears.

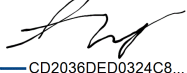
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Respectfully Submitted,

February 10, 2023

DocuSigned by:

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Amiee Yelinek