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9 Attorneys for Plaintiffs

10  
11 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
12 **IN AND FOR GILA COUNTY**

13 GERALD BOUMA, a married man,  
JOHNNA LASH, a married woman,  
14 LINDA MILLER, a married woman, and  
PATRICK WARD, a single man,  
15  
16 Plaintiffs,  
v.  
17 TIMOTHY TRENT, a married man, and  
DAISY FLORES, his wife,  
18  
19 Defendants.

**No. CV2009-0340**

**SECOND AMENDED COMPLAINT**  
**(Tort non-motor vehicle)**

**Jury Trial Demanded**

(Assigned to Hon. William J. O'Neil)

19 Plaintiffs allege as follows:

20 **JURISDICTION AND VENUE**

- 21 1. At all material times, Plaintiffs (jointly "Plaintiffs") Gerald Bouma  
22 ("Bouma"), Johnna Lash, ("Lash"), Linda Miller ("Miller"), were residents of Gila County,  
23 Arizona. Patrick Ward ("Ward") was a resident of Gila County and at times a resident of  
24 New Mexico.
- 25 2. Timothy Trent ("Trent") and Daisy Flores ("Flores") are husband and wife  
26 and residents of Gila County, Arizona.
- 27 3. Trent was acting at all times for the benefit of their marital community.
- 28









- 1           58.    Ward moved to Arizona.
- 2           59.    Ward lost one game out of six.
- 3           60.    The team staff was not made up of academic professionals.
- 4           61.    For example, one staff member, Brad Beauchamp (“Beauchamp”) called
- 5   Ward’s son a “mother-f--ker” and told Ward’s son to “get the f--k off the field.”
- 6           62.    When Ward objected, this staff member intimated that he would have Trent
- 7   fire Ward.
- 8           63.    Beauchamp was a School Board member at the time.
- 9           64.    Trent issued a letter stripping Ward of his coaching duties but did not give
- 10   reasons.
- 11          65.    Ward wanted to tell his story to the school board but Trent would not let him.
- 12          66.    Ward was denied access to the School Board and the grievance process.
- 13          67.    Trent put pressure on the president of the local union not to represent Ward.
- 14          68.    The Board would not accept Ward’s resignation.
- 15          69.    In October 2008, Ward was offered a job in Truth or Consequences, New
- 16   Mexico.
- 17          70.    Trent threatened to fire Stephens if Stephens recommended Ward to anyone.
- 18          71.    After Trent spoke with the superintendent in Truth or Consequences, the job
- 19   offer of \$55,000.00 plus a \$10,000.00 bonus was revoked.
- 20          72.    Trent refused to communicate with Ward.
- 21          73.    On December 31st, a school district in Cloudcroft, New Mexico offered Ward
- 22   the job of head football coach which Ward accepted.
- 23          74.    Afterwards, the Assistant Director told Ward that the new superintendent
- 24   spoke to Trent and the new superintendent yanked the job offer.
- 25          75.    Ward found employment in a school district in Gallup, New Mexico.
- 26          76.    Beauchamp found out about this contract through Trent and spoke to the
- 27   superintendent of the school district in Gallup causing Ward to be released from a third
- 28   employment contract.







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- D. an award of punitive damages against Trent in an amount sufficient to express society’s disapproval of his outrageous conduct and to deter such conduct by Trent and others in the future;
- E. an award of taxable costs;
- F. an award of pre-judgment and post-judgment interest on all amounts at the highest rate permitted by law; and
- G. such other and further relief as this Court may deem just and proper.

Dated this 21st day of June 2010.

LAW OFFICES OF KEVIN KOELBEL, P.C  
LAW OFFICES OF WILLIAM R. HOBSON, P.C.

By: \_\_\_\_\_  
Kevin Koelbel  
William R. Hobson

1 ORIGINAL filed by mail with:  
2 Gila County Superior Court, Clerk  
3 1400 E. Ash  
4 Globe, AZ 85501

4 And copy mailed to:  
5 Hon. William J. O'Neil  
6 Pinal County Superior Court  
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11 this 21st day of June 2010.

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