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7 *Attorneys for the Representative Plaintiffs*
8 *and the Proposed Class*

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE DISTRICT OF MONTANA**
11 **MISSOULA DIVISION**

12 JOHN WALKER, LISA WALKER,
13 C.G., a Minor Child, ROY
14 PROVOST, AMY PROVOST and
15 J.P., a Minor Child, individually
16 and on behalf of all others similarly
17 situated,

18 Plaintiffs,

19 v.

20 WILDERNESS ALTERNATIVE
21 SCHOOL INC., a Montana
22 Corporation

23 Defendant.

Case No.: _____

Judge: _____

CLASS ACTION COMPLAINT

*Nationwide Class
Representation*

Jury Trial Demanded

24 Plaintiffs, John Walker, Lisa Walker, C.G., a minor child, Roy Provost,
Amy Provost, and J.P., a minor child, (collectively, "Representative
Plaintiffs") by and through their undersigned counsel hereby file this
Class Action Complaint, individually and as class representatives on
behalf of all other persons or entities similarly situated (collectively,

1 “Plaintiffs”) on knowledge as to their own status and actions and
2 otherwise upon information and belief, allege for their complaint
3 against Wilderness Alternative School, Inc., d/b/a Wilderness
4 Treatment Center (hereafter, “Defendant” or “WTC”) as follows:

5 **I. INTRODUCTION**

6
7 1. This is a consumer class action brought on behalf of all
8 purchasers or users of Defendant WTC’s services, for violations of the
9 Montana Unfair Trade Practices Act of 1973 (Mont. Code Ann. §§ 30-14-
10 101 *et seq.*), fraud in the inducement, negligent misrepresentation and
11 negligent infliction of emotional distress arising from Defendant’s
12 marketing, sale and performance of certain behavioral health, housing,
13 supervision, education, counseling, care and other related services
14 (“Services”).

15 2. Defendant has made false, misleading statements that are
16 likely to deceive reasonable consumers regarding its Services.

17 3. Defendant’s express or implied representations that its
18 Services were suitable for at-risk youth in need of rehabilitation services
19 were made in the United States and are false, deceptive, misleading and
20 violate almost every state consumer protection law in the United States.

21 4. Defendant has mistakenly or misleadingly represented that it
22 offers a safe environment which is adequately staffed to provide a safe
23 environment, lodging and counseling to support the recovery of boys
24

1 suffering from substance abuse and other behavior issues.

2
3 5. Defendant does not maintain adequate staffing, facilities and
4 other arrangements as necessary to deliver the promised Services and
5 the Representative Plaintiffs have been damaged as a result.

6 6. Representative Plaintiffs now bring this proposed consumer
7 class action on behalf of themselves and all other persons nationwide,
8 who, from the applicable limitations period(s) up to and including the
9 present, purchased or used Defendant's Services. Defendant has
10 deceived Representative Plaintiffs and other consumers nationwide.
11 Through Defendant's unfair and deceptive practices, Defendant has
12 collected millions of dollars from the sale of its Services that it would not
13 have otherwise earned. Representative Plaintiffs bring this action to stop
14 Defendant's misleading practice and recover damages.

15 **II. JURISDICTION AND VENUE**

16 7. This Court has jurisdiction over the subject matter presented
17 by this Complaint because it is a class action arising under the Class
18 Action Fairness Act of 2005 ("CAFA"), Pub. L. No. 109-2, 119 Stat. 4
19 (2005), which explicitly provides for the original jurisdiction of the
20 Federal Courts of any class action in which any member of the Plaintiff
21 class is a citizen of a state different from any Defendant, and in which
22 the matter in controversy exceeds in the aggregate the sum of
23 \$5,000,000.00, exclusive of interest and costs.
24

1 8. The total claims of the individual members of the Plaintiff
2 Class in this action are in excess of \$5,000,000.00 in the aggregate,
3 exclusive of interest and costs, as required by 28 U.S.C. § 1332(d)(2), (5).
4 As set forth below, Representative Plaintiffs are citizens of North
5 Carolina and Louisiana, and WTC can be considered a citizen of
6 Montana. Therefore, diversity of citizenship exists under CAFA and
7 diversity jurisdiction, as required by 28 U.S.C. §§ 1332(a)(1), (d)(2)(A).
8 Furthermore, Plaintiffs alleges on information and belief as WTC
9 markets itself to a national consumer base that more than two-thirds of
10 all of the members of the proposed Plaintiff Class in the aggregate are
11 citizens of a state other than Montana, where this action is originally
12 being filed, and that the total number of members of the proposed
13 Plaintiff Class is greater than 100, pursuant to 28 U.S.C. § 1332(d)(5)(B).

14 9. Venue in this judicial district is proper pursuant to 28 U.S.C.
15 §1391(a) because, as set forth below, Defendant conducts business in, and
16 may be found in, this district, and Plaintiffs purchased the subject
17 Services of this action in this judicial district. Venue is proper in this
18 Court because the Defendants engaged in the conduct at issue in this
19 judicial district and a substantial part of the events giving rise to the
20 claims herein occurred in this judicial district. 28 U.S.C. § 1391(b)(2) and
21 (b)(3).

22 10. Venue is proper in the Missoula Division because the conduct
23 at issue occurred in Flathead County, Montana. L.R. 1.2(c)(3), 3.2(b).
24

1 **III. THE PARTIES**

2
3 11. Representative Plaintiffs John Walker and Lisa Walker are
4 individuals more than 18 years old and residents of North Carolina; C.G.,
5 their son, is under the age of 18 years old and is a resident of North
6 Carolina (collectively, “Walker Family”).

7 12. Representative Plaintiffs Roy Provost and Amy Provost are
8 individuals more than 18 years old and residents of Louisiana; J.P., their
9 son, during the events herein was under the age of 18 years old and a
10 resident of Louisiana (collectively, “Provost Family”).

11 13. C.G. and J.P. were each sent by their respective parents, to a
12 facility operated by Defendant for treatment.

13 14. Defendant, Wilderness Alternative School, Inc. d/b/a
14 Wilderness Treatment Center (“WTC”), is a Montana corporation with its
15 principal place of business located at 200 Hubbart Dam Road, Marion,
16 Montana 59925. WTC’s Registered Agent, listed with the Montana
17 Secretary of State, is Nancy Brekke at the same address. Therefore,
18 WTC can be considered a “resident” of the state of Montana for purposes
19 of diversity jurisdiction or diversity of citizenship.

20 15. WTC is the provider of the Services, and is the company that
21 created and/or authorized the false, misleading, and deceptive
22 advertising for the Services and is the company that promoted, marketed
23 and sold the Services at issue in this judicial district.
24

1 16. The statements and advertising for the Services relied upon
2 by Plaintiffs were prepared and/or approved by WTC and its agents and
3 were disseminated by WTC and its agents through advertising and direct
4 statements containing the misrepresentations alleged herein. The
5 statements and advertising for the Services were designed to encourage
6 consumers to purchase the Services and reasonably misled the
7 reasonable consumer. (i.e. Plaintiffs and the Class)

8 17. Plaintiffs allege that, at all relevant times, WTC and its
9 subsidiaries affiliates and other related entities, as well as their
10 respective employees were the agents, servants and employees of WTC,
11 and at all relevant times, each acted within the scope and purpose of that
12 agency and employment.

13 18. Additionally, Plaintiffs allege that in committing the wrongful
14 acts alleged herein, WTC, in concert with its subsidiaries, affiliates
15 and/or other related entities and their respective employees, planned,
16 participated in and furthered a common scheme to induce members of
17 the public to purchase the Services by means of false, misleading,
18 deceptive and/or fraudulent representations and that WTC participated
19 in the making of such representations in that it disseminated those
20 misrepresentations or caused them to be disseminated.

21 19. Whenever reference in this Complaint is made to any act or
22 omission by WTC or its subsidiaries, affiliates, and other related entities,
23 such allegation shall be deemed to mean that the principals, officers,
24 directors, employees, agents and/or representatives of WTC committed,

1 knew of, performed, authorized, ratified and/or directed that act or
2 omission on behalf of WTC while actively engaged in the scope of their
3 duties.

4 **IV. FACTUAL ALLEGATIONS**

5
6 20. Plaintiffs repeats and re-alleges each and every allegation of
7 the foregoing paragraphs as if fully set forth herein.

8 21. Plaintiffs purchased Services from Defendant at its location
9 in Montana in reliance on statements made in its advertising materials
10 (see Exhibit 1, *Screenshots of WTC Website & Advertising Materials*,
11 attached hereto and incorporated herein) and in phone conversations
12 with Defendant's staff.

13 22. In purchasing the Services, Plaintiffs relied on the material
14 statements that the Services would be appropriate, adequate and safe for
15 their at-risk children.

16
17 23. Specifically, on April 10, 2018, Plaintiff John Walker spoke
18 with Defendant WTC via its employee Chase Sewall who answered the
19 Admissions Hotline. (see Exhibit 2, *Screenshots of WTC Website Staff*
20 *Page*, attached hereto and incorporated herein) Mr. Walker explained to
21 Mr. Sewall C.G.'s history and the critical concerns that he and Ms.
22 Walker had regarding C.G.'s stated intent to run away. Mr. Sewall
23 represented to Mr. Walker that WTC was suitable for his son, was a "good
24 match" and that there was "nowhere to run" and intense supervision

1 which prevented the risk of runaways. Mr. Sewall further stated that
2 C.G.'s situation was "very typical" of the types of children routinely in
3 their care.

4 24. Relying on the statements of WTC and ruling out other
5 facilities due to their inability to guarantee suitability for a child prone
6 to running away, Plaintiff Walker Family sent their son, C.G. to WTC.

7
8 25. WTC was aware that many children sent to its care would
9 require specialized transport and supervision to ensure safe arrival. (see
10 Exhibit 3, *WTC Website statement indicating safe escort required*,
11 attached hereto and incorporated herein)

12 26. The Walker Family ensured safe travel by hiring, at
13 substantial expense, a transportation service operated by off-duty law
14 enforcement officers which specializes in transporting teens who refuse
15 to willfully travel to a rehabilitation facility.

16 27. After admission, C.G. was assigned to WTC employee Nora
17 Rye who spoke with Mr. Walker on multiple occasions and again
18 reassured him that C.G. would not succeed in any attempts to escape or
19 run away. Ms. Rye repeated this assertion when Mr. Walker emailed her
20 regarding C.G.'s stated plan to escape with other children staying at the
21 WTC facility. (see Exhibit 4, *Email from John Walker to Nora Rye*,
22 attached hereto and incorporated herein)

23 28. WTC, including Ms. Rye, did not take necessary and required
24

1 actions to prevent C.G. from escaping.

2
3 29. On April 16, 2018 Plaintiffs Roy and Amy Provost spoke with
4 Defendant WTC via its employee Ben Dorrington. Mr. & Mrs. Provost
5 explained to Mr. Dorrington J.P.'s escape risk. Mr. Provost reiterated
6 this to Mr. Dorrington to ensure understanding that J.P. was a flight
7 risk.

8 30. Plaintiffs Roy & Amy Provost were assured by Mr. Dorrington
9 there was nowhere for J.P. to go, and that they never had an escape in
10 their facility during his [Mr. Dorrington's] tenure there. Mr. Provost was
11 very clear about J.P.'s escape risk and WTC was very adamant that they
12 were sufficiently prepared to prevent escapes.

13 31. Relying on the statements of WTC and ruling out other
14 facilities due to their inability to guarantee suitability for a child prone
15 to running away, the Provost Family sent their son, J.P. to WTC.

16 32. On the day after J.P. arrived at WTC, he broke into a room at
17 the facility in search of cigarettes. On a subsequent evening, J.P. and
18 another resident at WTC ran away from the facility after dinner and were
19 later found by police and returned to WTC.

20 33. These events, in addition to prior events, put WTC undeniably
21 on notice as to the flight risk and other risks they had undertaken and
22 the inadequacy of their safeguards, facility security and supervision.

23
24 34. C.G. and J.P. did in fact escape the facility by using a WTC

1 owned vehicle. (see Exhibit 5, *Patrol Report by Washington County Idaho*
2 *Sheriff's office*, attached hereto and incorporated herein)

3
4 35. C.G., J.P. along with other Plaintiff sons were able to drive
5 the WTC vehicle using keys left unsecured and available by WTC staff.

6 36. WTC had a duty to operate a secure facility as promised to
7 Plaintiffs and a duty to secure dangerous instruments, including but not
8 limited to motor vehicles such as the one used to escape.

9 37. During the time that C.G., J.P. and other Plaintiff sons
10 escaped, the WTC facility did not have sufficient staff on site or in the
11 cabin in which they were sleeping.

12 38. There were no WTC staff members present in or supervising
13 the cabin in which C.G. was sleeping on the evening he escaped despite
14 his prior suicide threats and despite WTC promising Mr. Walker that
15 C.G. would have 24 hour per day adult supervision as he would be on a
16 "suicide watch".

17 39. C.G. and other Plaintiff sons were taking a number of
18 prescription medications which were discontinued upon direction of WTC
19 staff and such discontinuation may have contributed to or caused
20 unpredictable behavior or an increased risk of harm.

21
22 40. WTC was or should have been aware of these increased risks.

23 41. Defendant represented independently to both the Provost
24

1 Family and Walker Family that it was well equipped to prevent run
2 ways and that there was “no place to go.” These representations were
3 in response to Plaintiffs’ stated concerns that their sons had a
4 demonstrated propensity to behave poorly and a stated desire to run
5 away from treatment facilities.

6 42. On information and belief, Defendant made similar
7 representations to other Plaintiffs. (see Exhibit 6, *Screenshots of Negative*
8 *Reviews Found Online*, attached hereto and incorporated herein)

9 43. Defendant’s representations to Plaintiffs were false, and as a
10 result, Plaintiffs entrusted their sons to care of Defendant and suffered
11 damages in an amount to be proven at trial.

12 **V. CLASS ACTION ALLEGATIONS**

13 44. Plaintiffs repeat and re-allege each and every allegation of the
14 foregoing paragraphs as if fully set forth herein.

15 45. Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs
16 bring this class action and seeks certification of the claims and certain
17 issues in this action on behalf of a Class defined as:
18

19
20 **All United States persons who have purchased Services**
21 **from WTC and persons who have been provided Services**
22 **from the applicable limitations period(s), through the filing**
23 **date of this Complaint.**
24

1 46. Plaintiffs reserve the right to amend the Class definition if
2 further investigation and discovery indicates that the Class definition
3 should be narrowed, expanded or otherwise modified. Excluded from the
4 Class are governmental entities, Defendant, any entity in which
5 Defendant has a controlling interest, and Defendant's officers, directors,
6 affiliates, legal representatives, employees, co-conspirators, successors,
7 subsidiaries, and assigns. Also excluded from the Class is any judge,
8 justice, or judicial officer presiding over this matter and the members of
9 their immediate families and judicial staff.

10 47. Defendant's practices and omissions were applied uniformly
11 to all members of the Class, including any subclass arising out of the
12 claims alleged herein, such that the questions of law and fact are common
13 to all members of the Class and any subclass.

14 48. All members of the Class and any subclass were and are
15 similarly affected by the deceptive statements regarding Defendant's
16 Services, and the relief sought herein is for the benefit of the Plaintiffs
17 and members of the Class and any subclass.

18 49. Based on the number of treatment counselors and the
19 statement on WTC's website regarding client to counselor ratio it is
20 apparent that the number of consumers in the Class is so large as to make
21 joinder impractical, if not impossible.

22 50. Questions of law and fact common to the Class exist that
23 predominate over questions affecting only individual members,
24

1 including, inter alia:

- 2
- 3 a. Whether Defendant's practices and representations related to
- 4 the marketing, and sales of the Services were unfair, deceptive
- 5 and/or unlawful in any respect, thereby violating the Montana
- 6 Unfair Trade Practices and Consumer Protection Act of 1973,
- 7 Mont. Code Ann. §§ 30-14-101 *et seq.* ("MUTPA");
- 8 b. Whether Defendant's practices and representations related to
- 9 the marketing and sale of Services amounted to negligent
- 10 misrepresentations, and/or fraud in the inducement, and/or
- 11 negligent infliction of emotional distress; and
- 12 c. Whether Defendant's conduct set forth herein injured
- 13 consumers, and if so, the extent of that injury.

14 51. The claims asserted by Plaintiff in this action are typical of

15 the claims of the members of the Plaintiff Class and any subclass,

16 as the claims arise from the same course of conduct by Defendant,

17 and the relief sought within the Class and any subclass is common

18 to the members of each.

19 52. Plaintiff will fairly and adequately represent and protect the

20 interests of the members of the Plaintiff Class and any subclass.

21 53. Plaintiff has retained counsel competent in both consumer

22 protection and class action litigation.

23

24

1 54. Certification of this class action is appropriate under Federal
2 Rule of Civil Procedure 23 because the questions of law or fact
3 common to the respective members of the Class and any subclass
4 predominate over questions of law or fact affecting only individual
5 members. This predominance makes class litigation superior to any
6 other method available for a fair and efficient judgment of the
7 claims.

8 55. Absent a class action, it would be highly unlikely that the
9 representative Plaintiffs or any other members of the Class or any
10 subclass would be able to protect their own interests because the
11 cost of litigation through individual lawsuits might exceed expected
12 recovery.

13 56. Certification also is appropriate because Defendant acted, or
14 refused to act, on grounds generally applicable to both the Class
15 and any subclass, thereby making appropriate the relief sought on
16 behalf of the Class and any subclass as respective wholes. Further,
17 given the large number of consumers of the Services and their
18 national geographic distribution, allowing individual actions to
19 proceed in lieu of a class action would run the risk of yielding
20 inconsistent and conflicting adjudications.

21 57. A class action is a fair and appropriate method for the
22 adjudication of the controversy, in that it will permit a large
23 number of claims to be resolved in a single forum simultaneously,
24 efficiently, and without the unnecessary hardship that would result

1 from the prosecution of numerous individual actions and the
2 duplication of discovery, effort, expense and burden on the courts
3 that individual actions would engender.

4 58. The benefits of proceeding as a class action, including
5 providing a method for obtaining redress for claims that would not
6 be practical to pursue individually, outweigh any difficulties that
7 might be argued with regard to the management of this class action.

8
9 **VI. FIRST CAUSE OF ACTION**
FRAUD IN THE INDUCEMENT

10 59. Plaintiffs repeats and re-alleges each and every allegation of
11 the foregoing paragraphs as if fully set forth herein.

12
13 60. Defendant represented in its advertising and phone
14 statements that it provided a safe environment for recovery.

15 61. Defendant's representations were material.

16
17 62. Defendant did not provide a safe environment. The
18 Defendant's representations were false.

19 63. Defendant represented that it maintained a specified level of
20 staff.

21
22 64. Defendant did not maintain that level of staffing. The
23 Defendant's representations were false.

1 65. Defendant represented that its facility was appropriate and
2 equipped for minors prone to run away, further representing that there
3 was “nowhere to go.”

4 66. Defendant’s facility was not appropriate or adequately
5 equipped and maintained to prevent such running away. In fact
6 Defendant, by failing to secure its vehicle, provided a means for running
7 away. The Defendant’s representations were false.

8 67. Defendant knew at the time it made such representations
9 that the same were false.

10 68. Plaintiffs relied on Defendant’s representations and their
11 reliance was reasonable.

12 69. Reliance on the truth of Defendant’s false representations was
13 the direct and/or proximate cause of damage to Plaintiffs.

14 70. Defendant knew that Plaintiffs would rely on such
15 representations and intended such reliance despite the high likelihood of
16 harm to Plaintiffs.

17 71. Plaintiff did not know that the Defendant’s representations
18 were false and had a right to rely upon such representations.

19 72. But for these fraudulent misrepresentations, Plaintiffs would
20 have not sent their children to Defendant, and/or would not have been at
21 Defendant’s facility.

1 **VII. SECOND CAUSE OF ACTION**
2 **NEGLIGENT MISREPRESENTATION**

3 73. Plaintiffs repeat and re-alleges each and every allegation of
4 the foregoing paragraphs as if fully set forth herein.

5 74. Defendant made a series of representations regarding its
6 ability to provide services to Plaintiffs including its ability to adequately
7 care for Plaintiffs' sons, prevent them from running away, and provide
8 specified levels of staffing and safety.

9 75. These representations were untrue.

10 76. Defendant knew or should have known that such
11 representations were untrue.
12

13 77. Such representations were made to induce Plaintiffs' reliance
14 upon same.
15

16 78. Plaintiffs did not know that these representations were false,
17 and reasonably and justifiably relied upon representations of Defendant.

18 79. Plaintiffs suffered damages as a result if their reliance in an
19 amount to be proven at trial.
20

21 **VIII. THIRD CAUSE OF ACTION**
22 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

23 80. Plaintiffs repeat and re-alleges each and every allegation of
24 the foregoing paragraphs as if fully set forth herein.

1 81. Due to the nature of Defendant's business and the services to
2 be provided, Defendant knew that Plaintiffs had a particular
3 susceptibility for such distress.

4 82. Defendant's actions and omissions, including without
5 limitation its failure to fulfil its obligations to provide a safe and secure
6 environment with adequate care, were reckless and outrageous.

7
8 83. As a result of Defendant's actions, Plaintiffs suffered severe
9 emotional distress including extreme fright, horror, grief, shame,
10 humiliation, embarrassment, anger, chagrin, disappointment, worry or
11 nausea.

12 84. Such severe emotional distress to both Plaintiff parents and
13 Plaintiff sons was a reasonably foreseeable consequence of Defendant's
14 negligent and/or intentional acts and omissions.

15 **IX. FOURTH CAUSE OF ACTION**
16 **VIOLATION OF MONTANA UNFAIR TRADE PRACTICES**
17 **AND CONSUMER PROTECTION ACT OF 1973**

18 85. Plaintiffs repeats and re-alleges each and every allegation of
19 the foregoing paragraphs as if fully set forth herein.

20 86. Plaintiffs are informed and believe, and thereon allege, that
21 Defendant engaged in extensive national marketing and advertising,
22 including, but not limited to, print, electronic media, television, internet
23 and direct marketing through agents, to promote and sell the Services as
24 suitable for the treatment of at-risk youth with substance abuse and

1 other issues when they were not suitable.

2
3 87. Defendant through its officer, Nancy Brekke and other
4 employees of WTC (as detailed in preceding allegations), in the days and
5 weeks preceding enrollment of Plaintiffs' sons, made virtually identical
6 representations to each Representative Plaintiff.

7 88. In a phone call with Plaintiff John Walker, after Mr. Walker
8 explained that his son had previously threatened to run away from a
9 treatment facility and explained his concern about security, WTC
10 assured Mr. Walker that there was no cause for concern, asserted that
11 WTC was experienced, sufficiently staffed, and equipped to handle these
12 situations and that further "there was no place to go."

13 89. In a phone call with Plaintiff Roy Provost, WTC used exactly
14 the same language in response to Mr. Provost's stated concerns about his
15 son's likelihood of attempting escape, again she said that WTC was
16 equipped and that "there was no place to go."

17 90. WTC made a series of false material statements (as outlined
18 in prior allegations) for the purpose of obtaining business and income by
19 selling Services to Plaintiffs.

20 91. Relying heavily on these assertions and not knowing that
21 these statements were false, Plaintiffs spent considerable money and
22 time to transport and enroll their sons in the services provided by WTC.
23

24 92. But for these false assertions which Defendant knew or

1 should have known were false Plaintiffs would not have sent their sons
2 to WTC.

3 93. Defendant expected Plaintiffs to rely on the assertions,
4 Plaintiffs did so to their peril, suffered damages, and such reliance was
5 reasonable.
6

7 **X. PRAYER FOR RELIEF**

8 **WHEREFORE**, Plaintiffs, on behalf of themselves and all others
9 similarly situated, request relief pursuant to each cause of action set
10 forth in this Complaint as follows:

11 1. For an order certifying that the action may be maintained as
12 a class action, certifying Plaintiffs as representatives of the Class, and
13 designating their counsel as counsel for the Class;

14 2. For an award of equitable relief as follows:

15 (a) Enjoining Defendant from making any claims for the
16 Services found to violate the Montana Unfair Trade
17 Practices and Consumer Protection Act of 1973;

18 (b) Requiring Defendant to make full restitution of all
19 monies wrongfully obtained as a result of the conduct
20 described in this Complaint; and

21 (c) Requiring Defendant to disgorge all ill-gotten gains
22 flowing from the conduct described in this Complaint;

23 3. For all actual and compensatory damages they have
24

1 suffered, including consequential and incidental damages, as a
2 result of Defendant's wrongful conduct and omissions in an
3 amount to be determined at trial;

4 4. For three times the actual damages sustained in accordance
5 with applicable law;

6 5. For costs, expenses and attorney's fees incurred in
7 connection with this action;

8 6. For pre-judgment and post-judgment interest on any
9 amounts awarded;

10 7. For such other relief as the Court finds just and proper.

11 **XI. JURY DEMAND**

12 Plaintiffs respectfully demand a jury trial on all issues so triable.

13 Respectfully Submitted,

14 Dated: September 5, 2018

15 By: 

16 Keith L. Gross, Esq.
17 GROSS LAW GROUP, P.A.

ABOUT WTC

EXPERIENCE Admission



Packet
Download and fill out this packet and fax to 406-854-2832 prior to admission. [Click to view](#)

ADMISSIONS

TOUR

TESTIMONIALS Family Packet



Download our Family Packet that will prepare you and our counselors for Family Week. [Click to view](#)

FINANCING

RESOURCES WTC Brochure



Download our brochure that gives an overview of our mission, philosophy and treatment costs. [Click to view](#)

CONTACT US



Treatment Philosophy

12-step Recovery program
Minnesota Model
4 1/2 day Family program
60 day inpatient, includes 16 to 21 day wilderness experience
Males only, age 14 - 24



Quality Assurance

Counselors are Licensed
Addiction Counselors
Licensed Counselors on Entire Wilderness Trip
5:1 patient to counselor ratio
Individual treatment planning
Weekly family contact
Medically supervised
Montana State Licensed



Treatment Reputation

Featured on national TV documentary: "Over the Influence"
Services utilized by professionals from all 50 states
Selected by Avon Books: "The 100 Best Treatment Centers for Alcoholism and Drug Abuse"
Featured on NBC Nightly News with Tom Brokaw



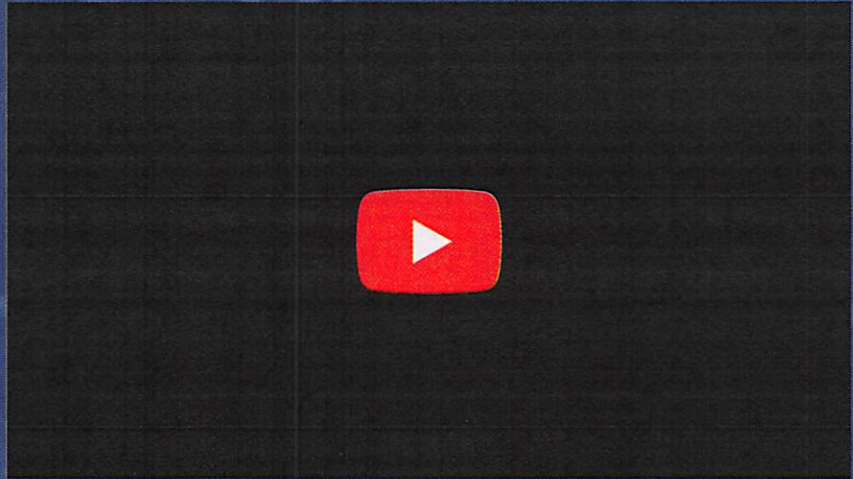
Cover Stories

"Treatment Today"
"Our Health Magazine"
"Freedom Magazine"
Featured Articles
National Geographic
"Employee Assistance"
"Montana Magazine"
"Professional Counselor"
"Addiction Professional"



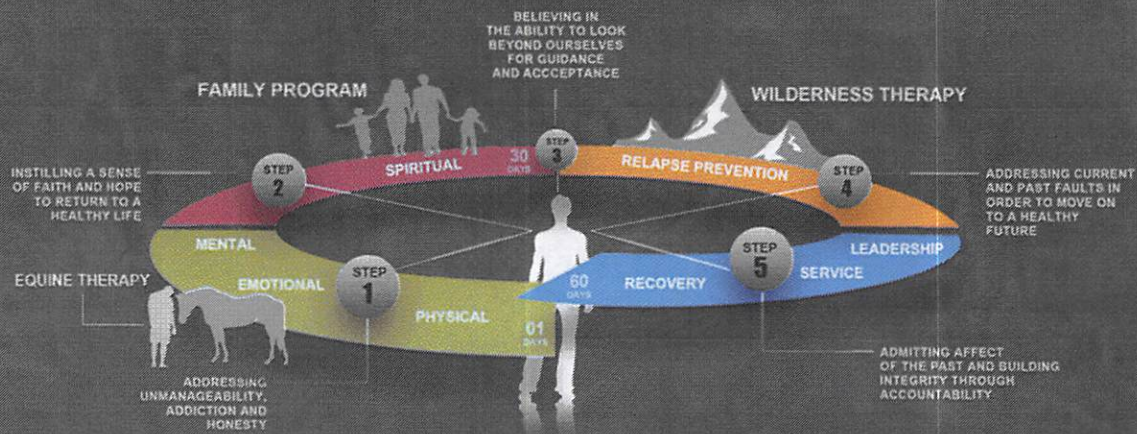
Accepting a Life of Sobriety

Wilderness Treatment Center is the first and only addiction treatment program to incorporate a traditional 30-day inpatient treatment with a wilderness expedition for young men and male teens. Each wilderness expedition is staffed with a fully licensed addiction counselor and wilderness instructor . This combination of traditional inpatient treatment and wilderness therapy approach is extremely powerful and designed to impact these young men and teens while teaching the tools they will need to live a life of sobriety.



From Discovery to Recovery | Our Philosophy

Our innovative model is built upon the therapeutic journey from discovery to recovery. Each step toward sobriety is carefully managed and addressed through individual therapy, group therapy, equine assisted therapy (**Eagala**), morning meditation, psychoeducational lectures, recreation, wilderness therapy, service and step work. While our patients have a primary counselor, the treatment philosophy of Wilderness Treatment Center provides each clinical staff member visibility into the treatment plans, behaviors and history of every patient. This team-based approach enables the entire staff the ability to address specialized circumstances and therapeutic opportunities based on individual experience. No adolescent and/or young adult program can match the amount of focus and therapeutic hours we provide each of our patients during treatment.



Recovery is the Best Alternative



Admission Packet

Click to view our Admissions paperwork that will need to be filled out, signed and faxed back to 406-854-2835.



Family Packet

Our setting is the perfect place for young men who often have trouble in the confines of a more conventional setting. Referrals come from outpatient/inpatient addiction treatment centers, individual therapists, probation officers, educational consultants, interventionists, alumni, substance abuse professionals, and families. Wilderness Treatment Center uses these resources to better assist the young men and teens.

Historical Dude Ranch

Setting

Wilderness Treatment Center is located on a 5,900 acre, working cattle ranch, 25 miles west of Kalispell, MT. This ranch was built in 1924 and functioned as a high-end dude ranch from 1924 to 1970. The ranch was purchased in 1982 and in August of 1983, we admitted our first patient. Fifty percent of the original log buildings are still functioning today, giving Wilderness Treatment Center a true ranch atmosphere.



Click to view our family packet that will need to be filled out prior to our Family Week hosted each month.

Daily Treatment Schedule

Click to view a document that shows an example of a typical week at Wilderness Treatment Center (not counting Equine Therapy, Family Week, or the Wilderness Trip).

Click to view our brochure that outlines our mission and philosophy of the program as well as costs.

CONTACT US

Medical Insurance Coverage
Inpatient treatment is covered by most major medical insurance plans however, each plan is different. If approved, our Medical Insurance claim experts will help you manage the claim process as well as file all appeals on your behalf. We are in-network with Blue Cross-Blue Shield

Direct Pay
In the event that insurance is not an option, we take direct payments through check, wire transfer as well as accept all major credit cards. We are able to break payments up throughout treatment if applicable.
*All credit card charges are subject to a 3% administration fee.

Treatment Financing
We work with Prosper Healthcare Lending, a premier financing company in the healthcare industry. They offer healthy, simple interest loans with no prepayment penalties, no restrictive interest, and longer terms for lower monthly payments.
PROSPER
CLICK TO APPLY

Treatment Services

Charges include all room, board, therapy, training sessions, wilderness trip, ropes course, family week, transportation to AA meetings, doctor visits, physicals, family consultations, psychologist reviews, nurse visits, 2.5 Academic credits and airport pickup and departure unless escorted

Call for Daily Rate
*Credit card payments are subject to a 3% service charge.

Equipment & Clothing
Clothing for Wilderness Expedition, fishing license, as well as all seasonal weather appropriate equipment such as backpacks, sleeping bags, tents, boots, stoves, transceivers, skis and food.
*All equipment damage due to abuse will be billed to patient's account.
Included

Family Week (strongly encouraged)
Our 4-1/2 day on-site family program allows for the reconstruction of family wholeness and health. The addiction counselors work closely with family members throughout the course of the addiction treatment to ensure the best possible outcome.
Included

After Care Support (strongly encouraged)
Aftercare is the responsibility of the patient and family however our professionals will work with you and your son to find the best and most appropriate program based on our assessment. We will help you make arrangements for aftercare during the last phase of treatment.
Included

Treatment Philosophy
12-step Recovery program
Minnesota Model
4 1/2 day Family program
60 day inpatient, includes 16 to 21 day

Quality Assurance
Counselors are Licensed
Addiction Counselors
Licensed Counselors on Entire Wilderness Trip
5:1 patient to counselor ratio
Individual treatment planning

Treatment Reputation
Featured on national TV documentary: "Over the Influence"
Services utilized by professionals from all 50 states
Selected by Avon Books:
Cover Stories
"Treatment Today"
"Our Health Magazine"
"Freedom Magazine"
Featured Articles
National Geographic
"Employee Assistance"
"Montana Magazine"

The First, The Finest



WILDERNESS
TREATMENT CENTER

A legacy of addiction treatment

Recovery is the Best Alternative

Wilderness Treatment Center is a family owned 60 day, inpatient chemical dependency addiction treatment facility for teens / young men between the ages of 14 and 24. We combine a conventional 30 day inpatient stay with a 16-21 day wilderness therapy expedition. As always, each of the expeditions is staffed by one of the addiction counselors and a wilderness instructor for the duration of the trip. The two components and length of stay allow Wilderness Treatment Center graduates to be further in the addiction recovery process than those leaving other programs.

Proven Treatment Model

From it's beginning, Wilderness Treatment Center has proven itself as a unique, safe and successful addiction treatment program for young men, approved and accepted by many major medical policies. Drug and alcohol dependency is a devastating and destructive disease and those young men who suffer from it and their families are entitled to the same loving care and addiction treatment as those suffering from any other disease. Our goal is to have young men and their families come away with a clear understanding of addiction and the tools to address and live a life of sobriety.

Addressing Addiction

Chemical dependency is defined as a primary, progressive and fatal illness. Without addiction treatment it will progress. When distrust, anger, worry and fear have become part of daily living, it is impossible to have a normal life. As soon as a family schedules their son's admission, the family's healing begins. Often, drug addiction problems are masked by anger, defiance, behavioral and emotional issues and other impulsive behaviors. Young men can be labeled ADD/ADHD, Oppositional Defiant, Conduct Disordered, Depressed and Bi-Polar. And because most young men will not be honest about the extent of their use, even well meaning addiction treatment professionals can underestimate and not accurately assess the level of impact their drug/alcohol addiction is having.

Our Mission

It is the mission of Wilderness Treatment Center to assist young men in their recovery from drug/alcohol addiction. It is our goal to introduce the young men and their families to a way of life, free from drugs and alcohol with an increased self-esteem and feeling of empowerment. Through our innovative program, incorporating the principles embodied in the 12 Steps, we instill motivation and hope for the future. Blending traditional and experiential therapies, the young men and their families create a new beginning, a new freedom, and a new happiness.

Therapeutic Philosophy

Families are informed of addiction treatment planning and progress on a weekly basis. Our 4-1/2 day family program allows for the reconstruction of family wholeness and health. The addiction counselors work closely with family members throughout the course of the addiction treatment to ensure the best possible outcome. The young men are medically supervised. Our experienced and licensed addiction treatment counselors utilize the 12 Steps and other therapeutic philosophies to assist these young men. Days are filled with individual and group therapy, informational videos and lectures, not only at the ranch, but also in the wilderness.



success for more than 30 years.



**60 DAY
INPATIENT
TREATMENT**



**14-24 YR
YOUNG MEN
AND TEENS**



**16-21 DAY
WILDERNESS
THERAPY EXPEDITION**



**35 BED
RANCH BASED
EXPERIENCE**



**12 STEP
BASED MODIFIED
THERAPY**



**32 YEAR
WILDERNESS
SUCCESS MODEL**

\$425

Per Day

\$500

Equipment Fee
(1 Time Charge)

\$100

Allowance
(Recommended)

Charges include all room, board, therapy, training sessions, wilderness trip, ropes course, Equine Assisted Psychotherapy, family week, transportation to AA meetings, doctor visits, physicals, family consultations, psychologist reviews, nurse visits, 2.5 Academic credits and airport pickup and departure unless escorted.

Treatment Financing

Treatment financing is available if insurance is not an option. We are available to discuss the various options for payment.



For More Information:

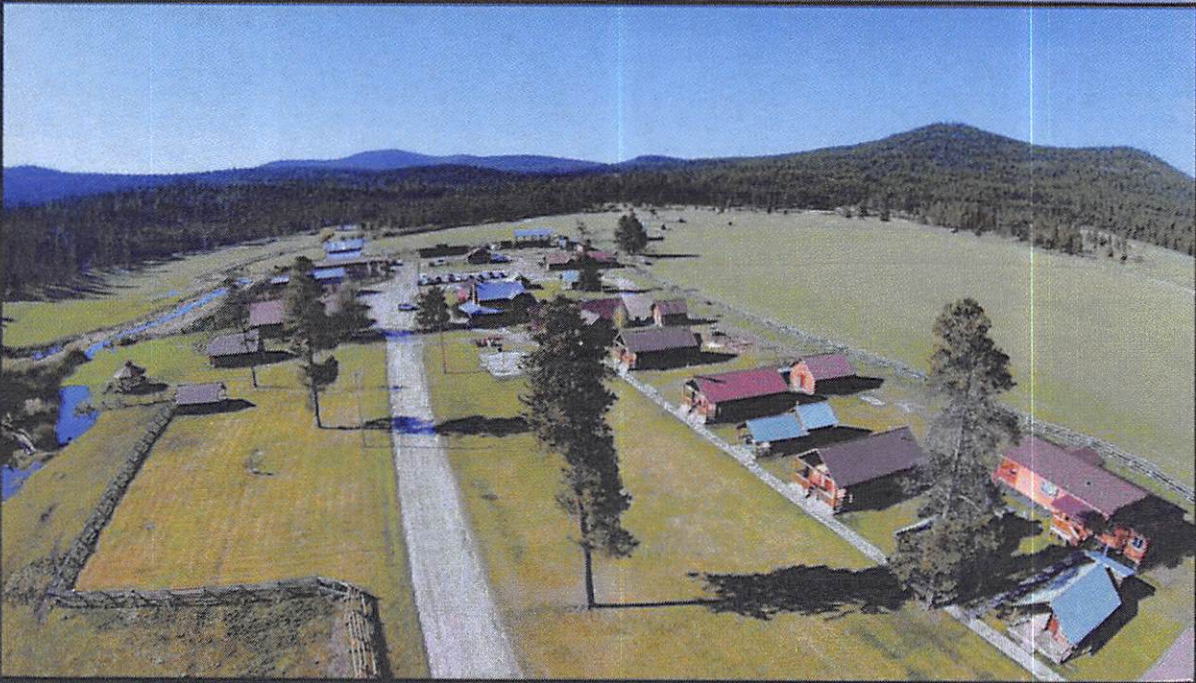
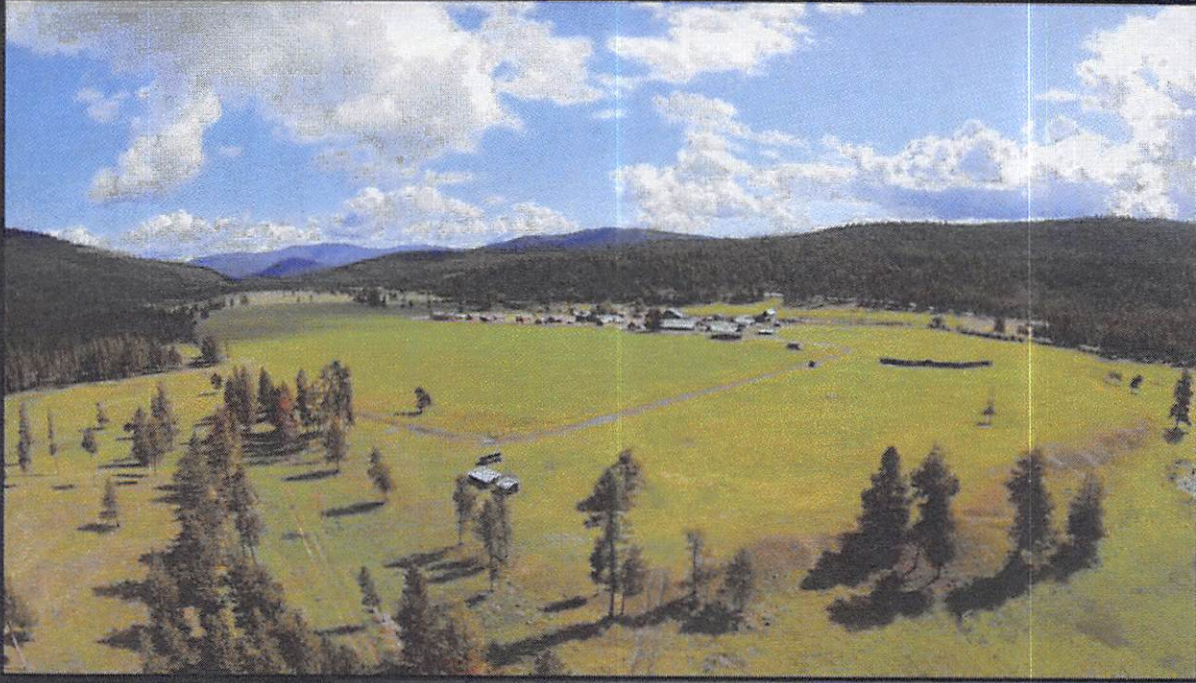
406.854.2832

wtc@wildernesstreatmentcenter.com

www.wildernesstreatmentcenter.com

www.facebook.com/wildernesstreatmentcenter





Historic Ranch Setting

Wilderness Treatment Center is located on a 4,000 acre, working cattle ranch, 25 miles west of Kalispell, MT. This ranch, the M-Lazy-V, was built in 1924 and functioned as a high-end dude ranch from 1924 to 1970. The ranch was purchased in 1982 and in August of 1983, Wilderness Treatment Center admitted its first patient. Fifty percent of the original log buildings are still functioning today, giving Wilderness Treatment Center a true ranch atmosphere. Situated 2,959 feet above sea level on the west slope of the Rocky Mountains, Kalispell and the surrounding 5000 square mile Flathead Valley enjoy a relatively mild and pleasant climate year round including four distinct seasons.

200 Hubbard Dam Road | Marion, MT | 59925





Wilderness Treatment Center

200 Hubbart Dam Rd. Marion, MT 59925 (406)854-2832 (406)854-2835 fax
www.wildernesstreatmentcenter.com

ADMISSION

Wilderness Treatment Center is an inpatient free-standing facility for males 14-24 years old. The program is approximately 60 days with the actual length of stay based on how the patient progresses through the treatment process. Patients stay is typically 60-67 days. Patients may be admitted either by self, by their physicians, family, clergy, or other treatment programs and professionals.

Admissions are scheduled seven days a week. Contact an admissions coordinator at the business office Monday through Sunday from 8:00 a.m. to 5:00 p.m. M.S.T. to make necessary arrangements.

COST

\$525

Per Day – all room, board, therapy, training sessions, equine therapy, wilderness trip, ropes course, family week, transportation to AA meetings, doctor visits, physicals, family consultations, psychologist reviews, nurse visits, 2.5 Academic credits and airport pickup and departure.

\$0

Clothing Allowance – Clothing for Wilderness Expedition, fishing license, film, etc. All equipment such as backpacks, sleeping bags, etc. is provided. Any equipment damage due to abuse will be billed to patient's account.

\$0

Family Week – Our 4 ½ day family program is held once per month, utilizing the principles of the Al-Anon program and family system dynamics. Our family therapists are available Sunday through Thursday for phone conferences and will arrange a family week attendance with you.

\$0

Aftercare – Aftercare is the responsibility of the patient and family. The patient and his counselor will make arrangements for aftercare during the last phase of treatment based on recommendations by the treatment team.

ACCREDITATION

Wilderness Treatment Center is a licensed, free-standing, in-patient and day treatment program that uses the steps of A.A. and N.A. The program is medically supervised and covered by some medical insurance plans.

Wilderness Treatment Center is licensed through the State of Montana Department of Public Health and Human Services, Addiction and Mental Health Disorders Division.



Wilderness Treatment Center
200 Hubbart Dam Rd. Marion, MT 59925 (406)854-2832 (406)854-2835 fax
www.wildernesstreatmentcenter.com

FEE PAYMENT AGREEMENT

******* PLEASE SIGN AND FAX BACK *******

Date: _____ Patient Name: _____

I understand that the cost of treatment is \$525 per day for Wilderness Treatment Center's 60 day program. If the patient stays for 60 days, the cost is \$31,500. If the patient stays longer than 60 days, the charge is still \$525 for each additional day. Check, wire or cash are acceptable forms of payment. We also accept Visa, MasterCard, Discover and American Express and will include a non-refundable 3% administrative fee on each transaction if a card is used for payment. Checks, cash or wires are not subject to administrative fees.

- **The amount of the down payment is \$10,500 and is due upon admission.**
- **The 30 day payment will be \$10,500 and is due 30 days after admission.**
- **The final payment is \$10,500 plus any additional days and is due upon discharge.**

Any additional balance for days beyond the 60 day stay is due and payable upon discharge from our program. Most patients stay is between 60-67 days. 60 days is the minimum amount of programming days to graduate our program. A final bill will be sent after discharge for any additional charges beyond the discharge date.

The costs cover: all room, board, therapy, training sessions, equine therapy, wilderness trip, wilderness equipment, ropes course, family week, transportation to AA meetings, doctor visit/physical, family consultations, psychologist review, nurse visits, 2.5 Academic credits and airport pickup and departure if necessary.

Past due payments shall bear interest at the rate of 18%. This includes the down payment, 30 day payment, and final payment. All accounts not paid within 60 days of discharge shall be subject to collection in accordance with our collection policy and that in the event of collection, I agree to pay any and all costs of collection, including litigation costs and reasonable attorney fees incurred.

Wilderness Treatment Center will try and work with your insurance carrier, however, please note that there is no guarantee of payment from the carrier. An insurance claim will be submitted after discharge for WTC. If payment from the insurance carrier comes directly to WTC, a refund for any overpayment will be processed in a timely manner.

Signature

Signature

SS# _____

SS# _____

Address and Phone



Wilderness Treatment Center
200 Hubbard Dam Rd. Marion, MT 59925 (406)854-2832 (406)854-2835 fax

(Patient Name)

**ACKNOWLEDGEMENT OF RISK
ASSUMPTION OF RISK AND RESPONSIBILITY**

PLEASE READ CAREFULLY

All participants will be actively involved in a wilderness expedition during week five, six, and seven. There are significant elements of risk in any adventure that travels beyond the trailhead in which trekking, hiking, mountaineering, rappelling, rock climbing, skiing, solo, snowshoes, backpacking, fishing or initiative games can occur.

ACKNOWLEDGEMENT OF RISK:

In agreeing to have your son attend WTC, you recognize the fact that there is an inherent danger in the following activities: 1) Falls, 2) Cold weather related injuries including hypothermia and frostbite, 3) Heat-related illness including heat exhaustion and heat stroke, 4) Acts of nature which may include: avalanche, rock falls, crevice falls, high winds and severe cold, 5) River crossings, fording or travel, including travel to and from the activities, 6) Risks associated with crossing, climbing or down climbing rocks and ice, 7) Equipment failure. I/we also acknowledge that certain foreseeable or unforeseeable events may contribute to the unpredictability of the activity. Personal property may be damaged or lost and that I/we may suffer an accident or illness in remote places where there is no available medical facility and that wearing a helmet and appropriate clothing are basic safety precautions. As a potential user of the services Wilderness Treatment Center provides you have a right to ask the safety record and accident incidents of past participants at Wilderness Treatment Center.

PARENT SIGNATURE

PATIENT SIGNATURE

HEALTH INSURANCE AUTHORIZATION FORM

WILDERNESS TREATMENT CENTER

(Patient)

In cases where the patient is covered for the cost of care and treatment, under an insurance plan, either his own or under that of the responsible person: it is necessary to obtain the signature of the policy-holder on the following authorizations before a claim may be submitted for payment.

AUTHORIZATION TO RELEASE INFORMATION: I hereby authorize the above treatment center to release medical information necessary to process this claim following the HIPPA Act.

Date: _____ Signature: _____

AUTHORIZATION TO PAY INSURANCE BENEFITS: I hereby authorize payment of the Hospital Benefits herein specified and otherwise payable to me, directly to the Treatment Center. I also understand that I am financially responsible for all charges not covered by the insurance company.

Date: _____ Signature: _____

Please answer the following questions to the best of your ability.

Insurance Company's Name and Address: _____

Insured's Name and Address: _____

Insured's Identifying Number/Social Security Number: _____

Insured's Group Number: _____ Policy Number: _____

Insured's Certificate Number or Other: _____

If patient has other health insurance, health plan or state assistance, enter its name, address, and policy or medical assistance number here: _____



Wilderness Treatment Center
200 Hubbard Dam Rd. Marion, MT 59925 (406)854-2832 (406)854-2835 fax

CONSENT TO MEDICAL CARE AND TREATMENT

I, _____ (legal guardian), authorize all medical and surgical treatment, x-ray, laboratory, anesthesia, and other medical/hospital procedures as may be performed or prescribed by a licensed physician for,

_____ (patient's name) and waive my right to informed consent of treatment.

Birth Date _____

Birthplace _____

Mother's Maiden Name _____

Allergies _____

Chronic Illnesses _____

Regular Medications _____

Date of Last Tetanus Immunization _____

Patient's Physician _____

Physician's Phone Number _____

Mother's Emergency Contact Number _____

Father's Emergency Contact Number _____

Date

Signature of Legal Guardian

Witness

Patient's Address

Wilderness Treatment Center

Patient# _____ Date: _____
SSN: _____

Patient Name: _____ Age: _____ DOB: _____

How did you hear about us: _____

Parent _____

Phone _____

Address _____

Insurance _____ Policy # _____

Group # _____ Phone _____

Employment _____ SSN: _____

Parent _____

Phone _____

Address _____

Drug of Choice _____ Secondary _____

Duration and Frequency of Use _____

Prior Treatment: Yes _____ No _____ Inpatient _____ Outpatient _____

Previous Programs and Dates:

1) _____

2) _____

3) _____

4) _____

5) _____

6) _____

Current Living Situation: _____

Siblings (Name and Ages) _____

Physical Condition _____

Allergies _____

Medications _____

Family Physician _____ Phone _____

Immunization Record _____

Person's perception of own alcohol/drug problem: Accepts _____ Denies _____

Comments _____

Age person started using chemicals _____

Consequences of use _____

Legal Status: N/A _____ Probation _____ Parole _____ Court Ordered _____

Probation Officer _____ Phone _____

Attorney _____ Phone _____

Mental Status (any mental health concerns/history of trauma/etc...)

Needs or Focus Areas _____

Additional Information _____

WILDERNESS TREATMENT CENTER PROGRAM COSTS

******* PLEASE READ AND FAX BACK *******

The following is an explanation of the billing procedures for WTC. The cost of treatment is \$525 per day and the average length of stay is 60 days, however, there are many factors that are involved in the length of stay. The progress of the patient, admission date, the family week schedule and the wilderness trip so approximately 67 days is a possibility.

The \$525 per day includes:

- Room and Board
- Individual and Group Therapy
- Education groups, lectures and videos
- Parent consultation and weekly updates
- Complete physical exam and lab work
- Psychological test
- Family week
- Equine Therapy
- High ropes course
- Wilderness equipment and trip supplies
- Recommendations with the aftercare placement

The extra charges that may be on the bill are any extra doctor visits for sickness, medication reviews, or insurance phone conferences with the Medical Director and the insurance company. Any medications, extra blood tests, x-rays, damages or incidental expenses will be on the final bill.

If there is insurance being utilized for treatment we need to know prior to admission as it will affect any coverage if we send it in late due to preauthorization. The insurance company is not billed until the patient is discharged for treatment and it then takes a minimum of 30 days to hear anything. The down payment, 30 day and final payment must be paid timely on each of the due dates. Past due payments shall bear interest at the rate of 18%.

We have a 72 hour hold policy which means there is no fee adjustment or reductions for periods in which a patient is not physically at WTC, if they leave the facility unauthorized we hold the bed and bill accordingly. This policy is leveraged only if we have a waiting list for treatment.

Please read this and sign and return with the fee payment agreement that you understand the billing procedure and agree with the treatment process, length of stay and agree to pay accordingly.

Date: _____ Parent's Name: _____

Patient Name: _____



WILDERNESS TREATMENT CENTER

Packing List

REQUIRED

- Jeans
- Long sleeved shirts
- T-Shirts
- Coat, Hat, Gloves
- Tennis Shoes
- Socks (for winter heavy socks)
- Underwear (long underwear in winter months)
- Toiletries (toothpaste, toothbrush, shampoo, razors, etc.)
- Shorts in summer months
- Flip-Flops for shower
- Writing paper, enveloped, stamps
- Chap Stick
- Personal account money (\$100 recommended)

OPTIONAL

- Sweatshirt
- Lightweight hiking boots
- Rain Jacket

Because our facility is located on a working cattle ranch, dress is very casual. Please bring clothes that you don't mind getting dirty, and if possible, mark them with your name. Laundry will be done every four days, so bring enough clothes for that kind of time period, but not much more, as storage is limited. We provide bedding and towels.

DO NOT bring any electronics, essential oils or jewelry. (You will not be allowed to wear jewelry on the wilderness trip and all cell phones will be locked up on admission) Also, **DO NOT** bring magazines or books (besides treatment material, AA literature or religious bibles). Chewing gum is not allowed. Please notify us before admission if the patient is on prescribed medication.

Wilderness Treatment Center is not responsible for personal property brought for the patient's own use. It is the patient's responsibility to take care of the personal property and to turn in any valuables in their possession. We are not responsible for any belongings left (patients leaving belongings at time of discharge or if a patient leaves the facility against staff advice) or for mailing any articles left at our facility.

IMPORTANT INFORMATION:

ALL PATIENTS MUST BRING PICTURE ID

MARK ALL CLOTHING

BRING A COPY OF VACCINATIONS AND LIST OF ALLERGIES

ALL MEDICATION MUST BE IN ORIGINAL BOTTLE WITH CLEARLY MARKED INSTRUCTIONS

NO PACKAGES ALLOWED DURING TREATMENT



Wilderness Treatment Center Sample Therapy Schedule

a.m.	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
7:00	WAKE UP	WAKE UP	WAKE UP	WAKE UP	WAKE UP	WAKE UP	WAKE UP/FREE
8:00	BREAKFAST	BREAKFAST	BREAKFAST	BREAKFAST	BREAKFAST	BREAKFAST	
9:00	CHORES	CHORES	CHORES	CHORES	CHORES	CHORES	
10:00	MORNING MEDITATION	MORNING MEDITATION	MORNING MEDITATION	MORNING MEDITATION	MORNING MEDITATION	MORNING MEDITATION	BRUNCH AND FREE TIME
11:00	PSYCHOEDUCATIONAL LECTURE	PSYCHOEDUCATIONAL LECTURE	PSYCHOEDUCATIONAL LECTURE	PSYCHOEDUCATIONAL LECTURE	PSYCHOEDUCATIONAL LECTURE	PSYCHOEDUCATIONAL LECTURE	
12:00	GROUP THERAPY	GROUP THERAPY	GROUP THERAPY	GROUP THERAPY	WORK THERAPY	WORK THERAPY	MORNING MEDITATION
1:00	LUNCH	LUNCH	LUNCH	LUNCH	LUNCH	LUNCH	ORGANIZED RECREATIONAL THERAPY
2:00	INDIVIDUAL COUNSELING	INDIVIDUAL COUNSELING	INDIVIDUAL COUNSELING	INDIVIDUAL COUNSELING			
3:00	STEP GROUP THERAPY	STEP GROUP THERAPY	COMMUNITY	RECREATION THERAPY	WORK THERAPY	WORK THERAPY	
4:00	INDIVIDUAL COUNSEL PSYCHOEDUCATIONAL LECTURE	INDIVIDUAL COUNSEL PSYCHOEDUCATIONAL LECTURE	INDIVIDUAL COUNSEL PSYCHOEDUCATIONAL LECTURE	INDIVIDUAL COUNSEL PSYCHOEDUCATIONAL LECTURE			INDIVIDUAL ASSIGNMENTS
5:00	FREE	FREE	FREE	FREE			DINNER
6:00	DINNER	DINNER	DINNER	DINNER	DINNER	DINNER	
7:00	FREE	FREE	FREE	FREE		FREE	FREE
8:00	NARCOTICS ANONYMOUS	BIG BOOK STUDY	AA MEETING KALISPELL/ON-SITE	BIG BOOK STUDY	FREE ORGANIZED ENTERTAINMENT	AA MEETING KALISPELL/ON-SITE	AA SPEAKER ON-SITE AA MEETING
9:00	FREE	FREE	FREE	FREE		FREE	FREE
10:00	IN-CABIN	IN-CABIN	IN-CABIN	IN-CABIN	IN-CABIN	IN-CABIN	IN-CABIN
11:00	LIGHTS OUT	LIGHTS OUT	LIGHTS OUT	LIGHTS OUT	LIGHTS OUT	LIGHTS OUT	LIGHTS OUT





Administrative



NANCY BREKKE

CO-FOUNDER & CHIEF ADMINISTRATIVE OFFICER

As co-founder Nancy has been a part of Wilderness Treatment Center since the very beginning in 1983. She and her late husband John have established a quality of care that is expected for each and every patient that comes through the program for the past 32 years. As co-owner and administrator, Nancy not only works closely with all staff, but knows each patient very well and is committed to helping these young men on the road to recovery.



MATT BREKKE

OPERATIONS DIRECTOR

Matt Brekke is the Director of Operations and is tasked with overall strategic and operational responsibility for the facilities operations, business and marketing initiatives. Matt grew up on the facility with his two younger brothers since the age of 7. He recently returned to WTC from a 15 year career in Denver, CO having worked in multiple marketing and business leadership positions as well as his own consulting company.



BEN DORRINGTON

DIRECTOR OF ADMISSIONS, COUNSELOR, L.A.C.

Ben is a Licensed Addictions Counselor and a native of the Flathead Valley. He has a degree in Psychology from Linfield College and has been working at Wilderness Treatment Center since 2003. Ben is an avid golfer, fisherman and softball enthusiast.



CHASE SEWELL

BUSINESS DEVELOPMENT MANAGER

Since beginning his journey in recovery, Chase has worked with many programs helping adolescents and young adults achieve sobriety. He has spent his career in several recovery residences, an intensive outpatient program as a group therapist, and working with a drug screening company doing field work with clients.





MARY TOLLEFSON

ADMISSIONS COORDINATOR

Mary joined WTC in September of 2003. She has an extensive history working in the field including Alcohol and Drug Services in Bozeman and Northern Montana Chemical Dependency Center. Her experience as an administrator and with insurance companies adds to her expertise in performing her role.



CAROLYN (CJ) MCISAAC

ADMINISTRATIVE ASSISTANT

Carolyn, also known as CJ, was born and raised in Idaho. She attended secretarial school and worked at the National Reactor Testing Station/Idaho Engineering Labs. Since 1990 CJ has been the heart beat of WTC and probably the first person you will speak with when calling WTC.



ROSE SWEENEY

ADMINISTRATIVE ASSISTANT

Rose has been working at Wilderness Treatment Center for the past 3 years and has lived in Montana for the past 35. Rose is an avid horse enthusiast and accomplished dressage rider.



ALEXIS LAYCHAK

NURSE, LPN

Alexis and her husband moved from New Jersey to Montana in 1996. Her nursing career has been in primary hospital settings, home care, and addiction treatment centers. Alexis began working at WTC in 2002, and describes her time here as the most rewarding of any setting in her nursing career.

wildernesstreatmentcenter.com



rewarding of any setting in her nursing career.

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VIEN EMERY

NURSE, LPN

Vien joined us in 2016 after moving to Montana in 2011. She attended Vermont Technical College where she received her LPN. On top of helping out these young men each day, Vien manages a busy household with her husband Seth and kids Wylie, Mason, and Scout. When she is not checking symptoms she is out enjoying everything Montana has to offer in the outdoors.

Clinical



TIMOTHY J. STUTZMAN, M.D.

MEDICAL DIRECTOR

After growing up in the Flathead Valley, Dr. Stutzman received his Doctor of Medicine Degree from Loma Linda University in Loma Linda, Calif. He completed his residency at Family Medicine of Southwest Washington in Vancouver, Wash. Dr. Stutzman is board certified by the American Board of Family Practice and is a member of the Academy of Family Practice.



CHRIS NADASI, PH.D., ED.S.

CONSULTING PSYCHOLOGIST

Dr. Chris Nadasi is our licensed clinical psychologist providing intake, assessment, psychological and educational testing services at Wilderness Treatment Center. Chris has worked with adolescents and young adults for two decades, and has provided clinical services through several therapeutic schools and program.

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MARK LYGA

CLINICAL DIRECTOR, COUNSELOR

Mark has been at W.T.C. since 1998. He has a B.A. from State University of New York and an MSW from Syracuse. He is a Licensed Addiction Counselor and is a NAADAC certified Master Addiction Counselor. Mark hails from Upstate New York and moved to Montana to pursue his career at WTC.



PATRICK HAWKINS

CLINICAL DIRECTOR, COUNSELOR

Patrick is a Licensed Addiction Counselor. He has been working in the field of Chemical Dependency since 1995. He has worked at Hazelden Center for Youth and Families and Way 12 Half Way House. He received his training at The College of Saint Catherine in Minnesota. He has over 900 days in the backcountry on over 40 expeditions. He is married and the father of 2.



ROBERT BREKKE, L.A.C.

LICENSED ADDICTION COUNSELOR

Rob is a licensed addiction counselor. He graduated from Prescott College with a degree in Psychology. Rob has worked with at-risk youth in a variety of settings and locations including Outward Bound as program director. He has also completed an internship at the Hazelden Foundation.



JOE HERMES, L.A.C.

LICENSED ADDICTION COUNSELOR

Joe comes to us from St. Paul, MN. He holds a degree in Economics with a minor in Psychology from University of Minnesota Duluth and a Masters in Addiction Counseling from the Hazelden Graduate School of Addiction Studies. Joe is passionate about recovery and believes the 12 steps can transform lives.



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NATE MOORE, L.A.C.-E, WFR
LICENSED ADDICTION COUNSELOR

Nate comes to us from Indiana where he attended Indiana Wesleyan University receiving both B.S. in Psychology and Addiction Counseling. Most recently he was an Assistant Group Lead at Elements Wilderness Program where he was responsible for direct client care, treatment plan implementation, biopsychosocial and crisis management. Nate not only enjoys counseling adolescents on their addiction but is considered a "wilderness nut" logging over 100 days long distance backpacking, over 400 days in low impact camping and more than 600 days comfort living in a wilderness environment.



JOHN RAUSCH, L.A.C.
LICENSED ADDICTION COUNSELOR

John is a licensed addictions counselor who has returned to WTC after serving as an addictions counselor for the Montana Department of Corrections. He has had a great deal of experience as an addictions counselor and started his career as an addictions counselor with WTC in 2005. John has a Master's Degree in Addictions Studies from Governors State University and a bachelor's degree in criminal justice from the same institution.



NORA RYE, M.S.W., L.A.C.-E
LICENSED ADDICTION COUNSELOR (ELIGIBLE)

Nora joins us with 6 years of past experience counseling, mentoring and coordinating care for children, adolescents and adults. She has a passion for wilderness therapy with experience in neuropsychology with graduate-level research. She has also volunteered as a crisis response advocate for survivors of sexual assault. Nora has a Masters of Social Work from the University of Montana and in her off time, enjoys the outdoors and has a soft spot for all the dogs on campus.



BRANDON VAN ARSDALE, L.A.C.-E
LICENSED ADDICTION COUNSELOR (ELIGIBLE)

Brandon joined WTC to leverage his background in helping at-risk children as well as his love of the outdoors. His past work experience includes Radke Home for Boys, Clark Fork School and Paws Up activity guide. Brandon has a B.A. in Sociology from University of Montana. When he is not working, Brandon enjoys taking advantage of everything Montana has to offer including rafting, skiing, hiking, kayaking, mountain biking and spending time with Hunter, his Australian Shepherd and Meg, his fiance'.



Wilderness



GLENN BROWN, WFR, AV1
SENIOR WILDERNESS INSTRUCTOR

Glen is a Montana native and a Drummond High School graduate. Glen was honorably discharged from the Air force in 1995 and has held a variety of wilderness related positions since. Notably, Glen has worked for the United States Forest Service and has extensive knowledge of the Seeley-Swan, Mission, and Bob Marshall Wilderness areas.



JEROME VAL RIOS, WFR
WILDERNESS INSTRUCTOR

Jerome represents our international staff dynamic originating from France. He has worked throughout the U.S. in varied outdoor positions including a Teen Wilderness Adventure Coordinator in New Hampshire. He brings a wealth of experiential knowledge to the team and fluently speaks French, Spanish and English.



MATT COLEMAN, W-EMT
WILDERNESS INSTRUCTOR

Matt originally comes from Minnesota, where he graduated St. Cloud State University with a associates degree in criminal justice. Matt found his passion for wilderness therapy while working at a correctional facility, lead canoeing, hiking and winter camping trips all over northern Minnesota. He is a certified Wilderness EMT, Leave no trace master educator and professional climbing wall instructor. In his free time Matt enjoys hiking, hunting and white water kayaking.



GARRETT BRUMMEL, WFR
WILDERNESS INSTRUCTOR

Garrett is originally from Olympia Washington but has been a Montana resident since 2008. He graduated with B.A. degrees from the University of Montana Western in both Psychology and Sociology. Garrett enjoys all aspects of the outdoors and you can find him hiking, camping, biking, snowboarding, wakeboarding, and fishing during his time away from work.



Support



LARRY ANDERSON
RANCH HAND

Larry has been a part of the WTC family since 1987 when he and his wife Terry moved to Kalispell looking for a new start. Larry manages the ranch and livestock while keeping the 6000 acres of fenced land up and running. After 28 years working at WTC, Larry has become an institution here and continues to provide our young men sound advice from an old cowboy.



RILEY
CANINE THERAPIST

Riley is our newest lab arrival and spends his days tearing up toilet paper, chasing tennis balls and running all over the ranch. More times than not you can find him cheering up patients having a tough day or meeting families during family week. His best friends are Cooper and Ruby who he gets to play with on many occasions.



Treatment Philosophy

- 12-step Recovery program Minnesota Model
- 4 1/2 day Family program
- 60 day inpatient, includes 16 to 21 day wilderness experience
- Males only, age 14 - 24



Quality Assurance

- Counselors are Licensed Addiction Counselors
- Licensed Counselors on Entire Wilderness Trip
- 5:1 patient to counselor ratio
- Individual treatment planning
- Weekly family contact
- Medically supervised
- Montana State Licensed



Treatment Reputation

- Featured on national TV documentary: "Over the Influence"
- Services utilized by professionals from all 50 states
- Selected by Avon Books: "The 100 Best Treatment Centers"



Cover Stories

- "Treatment Today"
- "Our Health Magazine"
- "Freedom Magazine"
- Featured Articles
- National Geographic
- "Employee Assistance"
- "Montana Magazine"
- "Professional Counselor"
- "Addiction Professional"



Transportation

Please contact us as soon as you have booked transportation. We will then ensure there is staff available to pick up the patient from the airport. Unfortunately we do not have the staff to return to town so if you are accompanying the patient we ask that you rent a car for transport.

Referrals

We do not need a direct referral for admission. Most families will call on their own finding us through a variety of referral sources. Private therapist, psychiatrist, psychologists, doctors, outpatient/inpatient programs, interventionists, educational consultants, employee assistance professionals, addiction consultants, alumni, internet, attorneys, probation officers, etc. may all recommend our program, but we will still need to speak with a family member or guardian.

Adolescent Intervention & Transport

Services

Wilderness Treatment Center can provide recommendations for Adolescent Interventionists as well as Transport Services. In some cases families require teens to be safely escorted to Wilderness Treatment Center to ensure admission. Call us today if you need intervention or transport support for your son.

Call today: 406-854-2832

Need to Book a Flight?

Please check any of the flight booking options below. Depending on the time of year, direct flights are available from Chicago, Las Vegas, Seattle, Denver, Minneapolis, and Salt Lake City to Kalispell, MT (FCA).



Admission

Family Packet

WTC Brochure

PLAINTIFF'S EXHIBIT 3
tabbles



John Walker [REDACTED]

[REDACTED]
John Walker [REDACTED]
To: nora@wildernesstreatmentcenter.com
Cc: Lisa [REDACTED]

Sun, Apr 22, 2018 at 9:20 PM

Hi Nora,

After an unproductive phone call Saturday night, [REDACTED] tonight to inform him of his escape plan Monday, which involves stealing a truck with several of his newfound friends.

In your collective 30 years in business, I'm sure you've seen and are prepared for all manner of escape artists, from sophisticated to attention-seeking, but wanted to let you know where we are in our conversations with [REDACTED] as of today.

Thank you,

John and Lisa





Case SOP1800241

Printed on May 15, 2018

Status	Approved
Report Type	Patrol
Primary Officer	Sam Edwards
Investigator	None
Reported At	04/23/18 10:37
Incident Date	04/23/18 10:37
Incident Code	PURSUIT : Pursuit
Location	90 S 1st St, Cambridge, ID 83610
Zone	Cambridge
Beat	
Disposition	Under Investigation
Disposition Date/Time	05/14/18 12:08

Unspecified

JUVENILE - Age 17

JUVENILE - Age 16

JUVENILE - Age 17

JUVENILE - Age 16

ROADIFER, SHAWNA L - Age 36

Primary Narrative By Sam Edwards, 04/23/18 14:52**Pursuit**

Incident report: Pursuit

Vehicle: 2009 White Chevrolet Tahoe
 Montana Plate BRP 268

Location: Hwy 95 at approximately mp 102 to Hwy 95 at the Park Street light mp 84.

Date and time: 4/23/2018 at approximately 1037 hrs (10:37 am)

On the above date and time I was notified by Dispatch that an individual had attempted to break into a car in Cambridge. Dispatch advised that when the homeowner yelled at the individual he took off running and got into a white Chevrolet Tahoe with Montana plate BRP 268. She was unsure of their direction of travel from her residence. I was south bound on Hwy 95 at approximately mp 88 and turned around and headed to the residence in Cambridge to take the report. As I started down Midvale hill at about the rest stop the vehicle in question passed me south bound. I turned around and activated my emergency lights to attempt a traffic stop and identify any occupants in the vehicle. I was south bound attempting to catch up and the vehicle was passing slower traffic in a very dangerous manner. At

approximately 95 and Mp 95 someone in the vehicle threw out a case of Beer as they passed several vehicles. The pursuit continued until we entered the city limits of Weiser where Chief Carl Smith #162 and Officer Riley Hall #168 were stopping oncoming traffic. The vehicle in question turned west onto Park Street and came to a stop. A felony stop was conducted and all 4 subjects in the vehicle were taken into custody with out further incident.

After all the subjects were in custody Myself and Detective Aaron Walker responded back to highway 95 and approximately mile post 95 where I witnessed someone in the vehicle throw out a case of beer. We were able to find evidence of that and then I left the scene to assist another Deputy with a call in Cambridge. After I cleared that scene I responded to the residence where one of the subjects attempted to get into the pickup in Cambridge. I arrived on scene and spoke to the vehicle owner who advised she saw a young man sneak up to her truck and make entry through the drivers door. She advised she ran outside and yelled at him and he took off running toward the white vehicle with Montana plates that was just up the street. I asked if they got anything out of the vehicle and she said no. I then asked if they caused any damage and she advised no. I took pictures of the vehicle and tried to pull latent fingerprints from the pickup. I then took statements from the owner and a witness then cleared the scene.

Staff Sergeant Samuel I Edwards #241
Washington County Sheriffs Office

Supporting Narrative By Aaron Walker, 04/24/18 13:36

On April 23, 2018 at about 10:48 a.m. I was advised by Washington County Dispatch that Sgt. Edwards was attempting to stop a vehicle that had left the scene of an attempted vehicle burglary in Cambridge, Washington County, Idaho. The reporting party, Shana Roadifer called dispatch after seeing a male individual open the door of her white 2007 GMC Sierra pickup, Idaho license plate number 2A13169. After being confronted, the subject got into a white 2009 Chevy Tahoe with Montana license plate BRP268. Dispatch also advised me that Sgt. Edwards was following the vehicle south on Highway 95. At 10:50 a.m. I heard Sgt. Edwards advise over the radio that he was in pursuit of the vehicle. He further advised that his overhead emergency lights and siren was activated and that the suspect vehicle was traveling at about 90 miles per hour, passing several cars in an unsafe manner. At 10:54 a.m. I joined the pursuit as the secondary unit at about mile marker 91. While pursuing the suspect vehicle, I noticed that the driver maintained a speed around 90 miles per hour when not obstructed by traffic. As the driver approached other vehicles, the driver would swerve around and pass impeding traffic, regardless of oncoming traffic in such a way as to endanger other motorists on the road. As we approached Park Street, the driver turned east onto E. Park Street and stopped the vehicle.

Sgt. Edwards and I ordered the four occupants out of the car at gun point and they were taken into custody by Chief Deputy Strong and Sheriff Thomas without incident. We inventoried the vehicle and noticed the strong odor of marijuana, however, we were unable to locate any contraband. While attempting to locate contraband, a passing motorist yelled "Dilly, dilly!" as he drove by. I took pictures of the vehicle and its contents. Woody's Towing was called to remove it. Additionally, Sgt. Edwards told me that he observed the occupants of the vehicle throw a box of beer out of the window while he was pursuing the vehicle. Sgt. Edwards told me that he had been worried during the pursuit that the driver was going to cause a head on crash with an oncoming vehicle due to the way he was passing other cars on the highway. He also said that he had observed a box of beer be thrown from a window of the Tahoe while he was pursuing it at approximately mile marker 95. I later located the area where the beer had been thrown out at approximately mile marker 95.5. I found several Bud Light Beer cans and a Bud Light box. I also took pictures of the beer cans. It is possible that the motorist who yelled "Dilly, dilly!" out the window had observed the destruction of the Bud Light and was congratulating us on avenging the wasted beer and banishing the perpetrators to the pit of misery.

After securing the occupants of the vehicle and the vehicle itself, I was contacted by Deputy Andy Upton of the Flathead County Sheriff's Office in Kalispell, Montana. He advised me that the vehicle had been reported stolen from Wilderness Alternative Schools Inc. in Marion, Montana at about 3:00 a.m. He went on to say that four juveniles had been reported as missing from the school and they were suspected of theft of the vehicle. Dep. Upton advised me of the names of the suspects and that charges against each of them was being considered in his jurisdiction. The names he provided are as follows:



He stated that all of the boys except for R [REDACTED] had been entered as run aways in NCIC. Dep. Upton told me that the owner of the Tahoe estimated the value of the vehicle to be \$21,000.00.

After speaking to Dep. Upton, I interviewed each of the suspects. Each suspect was advised of his Miranda rights before questioning. Additionally, each suspect is a juvenile and they were advised that they could have a parent or guardian with them during questioning if they so chose.

I began the interviews with [REDACTED]^{C.G.} is 16 years old and is from Chapel Hill, North Carolina. He stated that he had been at Wilderness Treatment Center since April 13. He said that he had not known the other three boys before arriving at the treatment center. [REDACTED]^{C.G.} stated that the others had talked about taking a car and leaving the center. On April 22 while taking evening medications, one of them unlocked a window to the office where keys for facility vehicles were kept. Later that night, about 11:30 p.m., P [REDACTED]^{J.P.} and D [REDACTED] went to the office and got a key to the Tahoe. After getting the key, the two went back to the cabin, where the four of them stayed, and got [REDACTED]^{C.G.} and R [REDACTED]. They took their clothes and left the facility. [REDACTED] said that they were trying to get to California. When asked, [REDACTED] said that D [REDACTED] had tried to get into a pickup in Cambridge to find money so they could buy gas and food. [REDACTED] stated that they had all been smoking marijuana in the car and that they had been drinking Bud Light beer, but that D [REDACTED] threw all the beer out the window during the pursuit, at which time P [REDACTED] was driving.

After interviewing [REDACTED], I interviewed R [REDACTED] who invoked his right to refuse to answer questions without his parents there. R [REDACTED] is 16 years old and is from [REDACTED], California.

I then spoke D [REDACTED]. D [REDACTED] is 17 years old and is from [REDACTED] Virginia. He told me that he had helped P [REDACTED] take the keys out of the office, confirming what [REDACTED] stated. He also stated that he had paid someone \$20 to buy the beer for them but could not remember where that took place. He also confirmed that he had opened the door to a pickup in Cambridge with the intent of taking money from the vehicle to get gas. D [REDACTED] said that he threw the beer out of the window during the pursuit as well, and admitted to having smoked marijuana. D [REDACTED] also confirmed that P [REDACTED] was driving during the pursuit.

Finally, I interviewed P [REDACTED]. P [REDACTED] is 17 years old and is from [REDACTED] Louisiana. He stated he had unlocked the window to the office area with the intention to come back later and take the keys for the Chevy Tahoe. He stated that he purchased "half a blunt" of marijuana from a man for the sum of \$10. P [REDACTED] stated that when they got to Cambridge, they were almost out of gas so they all agreed that D [REDACTED] would try to find money or food in a pickup. P [REDACTED] said that after the owner of the pickup came out, they left. I asked him why he did not pull over when he saw Sgt. Edwards behind him with lights and sirens. He said that he knew he was in trouble and that the others were telling him to go.

After the interviews were completed, I allowed each of them to contact their parents. I spoke to each of the parents as well and advised them of their child's whereabouts and the possible charges against them. I also contacted Dahlia Stender from Washington County Juvenile probation. I advised her of the incident and she agreed to assist in getting bed available at the Canyon County Juvenile Detention Center, where they were transported a short time later. To the time of this report, charges are pending.

Supporting Narrative By Jeff Anderson, 05/12/18 13:53

On May 12, 2018 I released the keys and the 2009 White Chevy Tahoe (VIN 1GNFK13059R255488) to Kenneth Alden Haaby (DOB 1-5-61) of J & S Transport out of Billings, Montana. Mr. Haaby visually inspected the vehicle, marking

any damage, and then gave me a copy of the Straight Bill of Lading. I had him sign the release of property form and gave him the keys. Mr. Haaby loaded the Tahoe on a transport vehicle and left. The Release of Property form and the Bill of Lading are attached to this report.

6

BD on SEPTEMBER 21, 2016 2:06 PM

Our experience with WTC was traumatizing. This is a Disorganize program with limited supervision and they do not care about the kids or their families. When I called up initially I emphasize that my son is 18 years old and is a runner. They told me that they specialize in Young adolescents like this. Which is not true. Every time my son wanted to leave they gave him his phone and said go. After leaving three times in 11 days and they called and told me that he had to leave the program because he left three times. Which makes no sense because I told them that he was a runner and they never told me about this rule. The day before I had a conference with his counselor who told me he was doing better. As a parent dealing with a problem child we still worry and love our child very much. Which is why when we received a call from Mark telling me that our son had to leave immediately and that they were going to drop him off at a homeless shelter my wife and I were shocked, welded and panicked. I had to have my attorney call them and arrange them to take my son to the airport and not a homeless shelter. They also took away his phone the day before and mailed it to us so there was no way we could even communicate with our son. Luckily at the airport they assisted him because this WTC program that I paid \$7000 for 11 days did nothing but traumatize our family. Also as a point of interest the first night my son was asked by another student to show me his penis. When I brought this up to Marc I believe he is the program director he said he would look into it. A week later we got a phone call from WTC that two students were molested and that the person was arrested and that my son was safe unharmed and uninvolved.

[REPLY >](#)

UNKNOWN on SEPTEMBER 23, 2016 11:30 AM

When did this happen? In the past or just recently?

[REPLY >](#)

DEBBIE KUTCHER on NOVEMBER 16, 2016 5:07 AM

Our family also had a very different experience. My son is also a runner and left the ranch after 10 days. However, we choose not to save him and allowed consequences to occur, understanding it was his choice. He decided to return to the ranch and complete the program. Today he is sober and happy. WTC made a great impression and was the beginning of his road to recovery. The family week is crucial and provides support and information about addition. Enabling by family will destroy an addicts chance at recovery. The staff is the best addiction counselors we have encountered. My son now lives in a sober living house and many of the guys he meets have attended WTC. They tell stories and laugh about how hard the program is but how badly they needed it, and are so glad they went to WTC.



Wilderness Treatment Center in Marion, MT

Call (406) 854-2832 to Contact Wilderness Treatment Center

VISIT WEBSITE

READ THE REHABS.COM 360 GUIDE

 DK

Our family is so thankful for this treatment center. My son attended at the age of 18 after fighting addiction for several years. It was the beginning of the road to recovery for our family. He also choose to leave the facility after a week, however we did not rescue him and allowed whatever consequences to occur. He decided to return and complete the program. WTC has all the ingredients to begin recovery and help young men who are desperate. The staff is the most qualified and caring people you will find in a rehab center.

Flag For Review

FACILITIES: ADD A RESPONSE

 Dgd



Treatment Effectiveness



Accommodations & Amenities



Meals & Nutrition

The most unprofessional program that exists. My son who was 18 years old attended WTC because they assured us that they are able to handle teenagers who attempt to leave programs and that was not true. After my son left his third time they basically called me when my wife and I were vacationing and said that they are going to drop my son off at a homeless shelter. My son has never been away from our home and they're threatening me to put my son in a homeless shelter? I had my attorney call them which at that point they took him to the airport. Disgusting place and unprofessional in every way.

Flag For Review

FACILITIES: ADD A RESPONSE

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VISIT WEBSITE

READ THE REHABS.COM 360 GUIDE


 S.E.

As a parent whose son attended WTC, the only weak link I observed in this otherwise stellar treatment center is the way one of the owner's sons, who is a counselor working directly with the boys, is allowed to degrade and provoke the boys. I want to clarify that the other son who works in the administrative end, presents himself in a professional manner. However, he seems to allow the other to sabotage the treatment the facility is providing Rob was observed during family week dealing with the boys in a nontherapeutic, punitive, and aggressive way. I can only imagine how he treats the boys when families are not present. I am surprised he continues to have a license as a counselor. The dynamic at play reminds me of the family dynamic in an alcoholic family, in which the alcoholic, is enabled, and the family hides the disease and covers it up to keep up the family image. It was observed that the nonfamilial counselors have to do damage control and do not have the power to address this unhealthy dynamic stemming from a family run business if they want to stay employed at WTC. When Rob's treatment of the boys was brought up by the boys in group therapy meetings, there seemed to be an unspoken rule to redirect this discussion. The mother, who is the owner, seems to protect her adult son from consequences of his nontherapeutic, unprofessional, and unethical behaviors. It is sad that an otherwise outstanding facility continues to allow this family member to undermine the good work they are trying to do. **IT IS TIME FOR HIM TO BE REMOVED FROM DIRECT CONTACT WITH THE BOYS.** The other staff members seem to have learned to either keep quiet and ignore, sometimes even defend, the bullying and unprofessional interactions with the boys. Truly, I am surprised that other boys and family members have not complained more about his behaviors. He was not observed having problems with boys who conformed to his bullying and did not oppose him. However, any boy who defied his treatment and refused to be broken, has no avenue to discuss the treatment they are experiencing. And once the mother is informed that one of the boys has cursed her son with the same words he used with them, it seems the staff rejects the boy. Just as a sick family turns on the family member who won't conform and keep the family's secret. Most of these boys have experienced trauma in their pasts with abusive adults, and his treatment, seems to add another layer of trauma. **THIS PROBLEM WITH WTC NEEDS TO BE CORRECTED IN THE BEST INTEREST OF THE BOYS, THE STAFF, AND THE COMPANY.**

Flag For Review

FACILITIES: ADD A RESPONSE

Recommended Reviews for Wilderness Treatment Center

 Your trust is our top concern, so businesses can't pay to alter or remove their reviews. [Learn more.](#) ✕

Search within the reviews



Sort by **Yelp Sort** ▾

Language **English (1)** ▾



L. G.

San Francisco, CA

 0 friends

 11 reviews



With so few reviews, your opinion of **Wilderness Treatment Center** could be huge. Start your review today.




A. G.

San Francisco, CA

 0 friends

 1 review

 11/20/2017

 First to Review

I was surprised that there were no reviews whatsoever on this program. For our purposes, it was the wrong choice. However I give it 2 stars because we kept in touch with other families that attended and some of their experiences were neutral. Several programs later (the norm) my advice is that local and IN network programs are best (you are closer, can check in on the program/son, keep cost well under control). Addict must also see the need to be there, NO amount of distance nor money can do that for them we've since learned. It is not a dual diagnosis program (many state they are now). Our son's personal experience was a traumatic one unfortunately. A program 25 miles away fully covered by ins. turned out to be more positive and effective. We have met with MANY professionals over the years \$\$... AA or NA parents groups provided the most useful contacts/advice and friendships...and they're free. Book recommendation: "Clean" by David Sheff.

4 people voted for this review

Wilderness Treatment Center

200 Hubbart Dam Rd, Marion, MT

 Write a review

3.9  7 reviews

Sort by: Lowest rating ▼



Riley Krishnek

1 review

 4 months ago

I first went to WTC for treatment in 2012 and had an amazing experience, the place was clean and organized and the staff was extremely respectful and genuine. I went back in 2018 to receive treatment a second time, expecting to have a somewhat similar experience to the one I had back in 2012. I'm sad to say that I was highly disappointed. From the cleanliness of the treatment center, to the way I was treated by the day staff (counselors especially), as well as the night staff. One of the night staff members actually caused several patients to relapse on marijuana during my stay there. Obviously no-one winds up in treatment from going on a super good streak in life, but everyone deserves to be treated with respect and I felt as if I were below the staff and less of a person than them, as did a majority of my peers. I chose to be there and to get help and I genuinely wish I would have chosen a different place. The place is very helpful to younger people, especially those who aren't respecting their families.

This is my personal opinion from my experience with the Wilderness Treatment Center. If you're choosing to go to get help as an adult I would highly recommend choosing a different facility.



Harrison Fortney

2 reviews

 a year ago

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

JOHN PLAINTIFFS
JOHN WALKER, LISA WALKER, C.G., a Minor Child, ROY PROVOST, AMY PROVOST AND J.P., a Minor Child, individually and on behalf of all others similarly situated

(b) County of Residence of First Listed Plaintiff Orange Co., NC
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Gross Law Group, P.A.
478 N. Babcock Street, Melbourne, FL 32935
(321) 586-2223

DEFENDANTS

WILDERNESS ALTERNATIVE SCHOOL INC., a Montana Corporation

County of Residence of First Listed Defendant Flathead Co., MT
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1
2 2
3 3
4 4
5 5
6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, LABOR, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Class Action Fairness Act of 2005 ("CAFA"), Pub. L. No. 109-2, 119 Stat. 4 (2005)

Brief description of cause:
Fraud / Unfair Trade practices involving Defendant's Services

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE SIGNATURE OF ATTORNEY OF RECORD

September 5, 2018

FOR OFFICE USE ONLY

SIGNATURE OF ATTORNEY OF RECORD

[Handwritten Signature]

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: ['Insufficient Staffing' at Wilderness Treatment Center to Blame for Escape of Runaway-Risk Minors, Class Action Claims](#)
