

STATE OF WISCONSIN

CIRCUIT COURT
BRANCH __

MILWAUKEE COUNTY

STATE OF WISCONSIN
17 West Main Street
Post Office Box 7857
Madison, Wisconsin 53707-7857,

Plaintiff,

v.

CORINTHIAN COLLEGES, INC.
6 Hutton Centre Drive
Suite 400
Santa Ana, California 92707

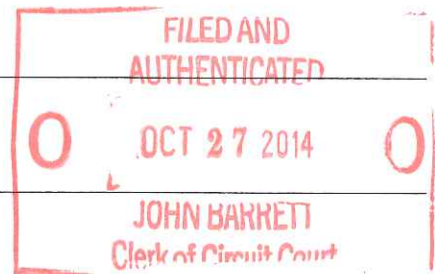
Defendant.

Case No. 2014 CX 00006

Complex Forfeiture: 30109

COMPLAINT

INTRODUCTION



The State of Wisconsin brings this enforcement action against Defendant Corinthian Colleges, Inc. for its use of false, misleading and deceptive representations to induce students to enroll in its post-secondary school "Everest College, Milwaukee." Among Corinthian's many misrepresentations were deceptive statements about critical facts such as the availability of externships in fields of study the school offered and the job placement rates of the school's graduates.

Contrary to Corinthian's representations that students would be placed into meaningful externships in their chosen field of study to provide on-the-job training and future employment potential, many students did not receive such externships. Some students were not even offered an externship; still others were placed in menial externships performing tasks that were unrelated

to their course of study. Corinthian compounded this deception by inflating the job placement rates of its graduates, which dipped to as low as 5%.

Corinthian's misrepresentations induced many Milwaukee-area students to spend (or most commonly borrow) up to \$21,000 for a course of study that, essentially, was worthless in helping them gain a new, higher-paying career. In support of its claims, the State alleges as follows:

PARTIES

1. Plaintiff, State of Wisconsin, brings this lawsuit on behalf of the Wisconsin Department of Justice ("DOJ"), and the Wisconsin Department of Agriculture, Trade and Consumer Protection ("DATCP"). The State of Wisconsin's principal offices are at the State Capitol in Madison, Wisconsin.

2. Defendant Corinthian Colleges, Inc. ("Corinthian") is a corporation organized and existing under the laws of the State of Delaware. Corinthian's principal place of business is Santa Ana, California.

3. Corinthian is engaged in the business of operating post-secondary career schools. Corinthian was founded in 1995, and has been a publicly-traded company since 1999. Corinthian operates over 100 campuses in the United States and Canada, with enrollment of over 85,000 students. In addition to other institutions across the country, Corinthian operated Everest College, Milwaukee ("Everest Milwaukee").

4. On July 2, 2014, Corinthian and its wholly and partially owned subsidiaries entered into an *Operating Agreement* with the U.S. Department of Education. Per the Operating Agreement, Corinthian placed most of its campuses up for sale and will close the remaining campuses.

JURISDICTION AND VENUE

5. This action is brought under Wis. Stat. § 100.18(11)(d) to enforce and restrain violations of Wis. Stat. § 100.18(1), and under Wis. Stat. § 100.20(6) to enforce and restrain violations of Wis. Admin. Code ch. ATCP 127. The State seeks to recover pecuniary losses suffered by Wisconsin consumers and to obtain forfeitures for those violations.

6. Venue for this action properly lies in Milwaukee County, Wisconsin in that the illegal conduct alleged by the state occurred there.

STATEMENT OF FACTS

Before opening Everest, Corinthian assured the State that it could adequately train and successfully place its projected student body.

7. In 2009, Corinthian announced its intention to open a private, post-secondary school in Milwaukee, Wisconsin, called “Everest College.”

8. Before opening the school, the Wisconsin Educational Approval Board (“WEAB”) required Corinthian seek its approval.

9. Corinthian sought to offer six allied-health programs: Dental Assistant, Massage Therapy, Medical Insurance Billing and Coding, Medical Administrative Assistant, Medical Assistant, and Pharmacy Technician.

10. Corinthian did not employ a traditional, sequential enrollment model based on a quarterly or semester curriculum. Rather, Corinthian utilized a business model that allowed for monthly enrollment into a “wheel curriculum,” which required the student to move from one module in the wheel of coursework to another. This model commingled new students with students about to graduate. After completing each module of the wheel, the student was required to complete a 160 hour externship prior to graduation. This requirement was later changed to 200

hours—after the school received complaints from prospective employers that students were not fully trained.

11. The programs lasted from eight to twelve months, with tuition and fee ranging between \$13,000 and \$20,000.

12. During its approval process, Corinthian provided the WEAB a host of information, including a projected enrollment at Everest Milwaukee of 25 to 50 students each month that would allow the school eventually to ramp up to and maintain a student body of 600.

13. Based upon the size of its projected student body, Corinthian concluded that it would need to develop 900 employer-partnerships in the Milwaukee area, to provide the externships required for its students prior to graduation.

14. Corinthian explained to the WEAB it had a goal of “a 50% hire-ratio from externship to permanent placement;” that is, at least half of externs would receive permanent job offers from the employer hosting the externship.

15. During the WEAB approval process, the WEAB expressed concerns regarding over-enrollment affecting placement rates. Corinthian responded to those concerns by saying the school would slow enrollment if the placement standards were not met.

16. The WEAB expressed concerns about Corinthian’s ability to find qualified staff to service Milwaukee’s high-needs population, and to consistently secure externship sites for 600 students in an already crowded Milwaukee allied-health program market. To address these concerns the WEAB required Corinthian to provide Milwaukee-specific data, confirming it had contacted employers to determine if 600 additional allied-health program externships could even be achieved in the greater Milwaukee area.

17. Corinthian provided the WEAB with data and analysis of how the school intended to provide students: (1) a quality education; (2) externships in their field of study; (3) timely graduation; and (4) a reasonable likelihood of career employment in their field of study.

18. This data included a list of 300 employers with whom Everest Milwaukee had purportedly connected to provide externships and/or employment to its students.

19. On January 9, 2010, Everest Milwaukee's first president, Mark Sullivan, penned an opinion editorial stating, "Despite the recession and a tough job market, last year 78% of Everest Milwaukee's graduates found employment in their fields of study." Mark Sullivan, *Everest College: Proposed school's Mission a good fit for Milwaukee*, JSONline: Your Opinions, Jan. 9, 2010. <http://www.jsonline.com/news/opinion/81039122.html>.

20. Based on Corinthian's representations that Everest Milwaukee had resources in place to accommodate the projected 600-person student body, on March 30, 2010, the WEAB approved the school's offering of five allied health programs at Everest Milwaukee: (1) Dental Assistant; (2) Medical Insurance Billing and Coding; (3) Medical Administrative Assistant; (4) Medical Assistant; and (5) Pharmacy Technician.

21. The WEAB did not originally approve the Massage Therapy program, because the WEAB believed the market could not accommodate graduates from yet another massage therapy program. The WEAB later approved the program based on Corinthian's representations that the school could meet the educational-externship and graduate-placement needs of the students in that program as well.

Contrary to Corinthian's representations to the WEAB, Corinthian enrolled more students than initially projected and never provided additional resources to adequately support the school's explosive growth.

22. Corinthian commenced soliciting and enrolling students in the summer of 2010 for a fall 2010 start date, and continued soliciting and enrolling students until July of 2012.

23. Despite a projected 600-person student body, Corinthian put in place a marketing budget for Everest Milwaukee that would double that projected enrollment in the first year.

24. Corinthian advertised to potential students through newspaper, radio and television advertisements, as well as through websites and direct-mail. It also sent recruiters into area high schools.

25. Likewise, Corinthian set enrollment goals for admissions representatives that, if achieved, would far exceed the enrollment projections provided to the WEAB.

26. For the first months the campus was operational, admissions representatives received bonuses for reaching those enrollment goals.

27. Incentive bonuses were later eliminated. However, admission representatives remained under intense pressure to enroll students, and believed their jobs were in jeopardy if certain enrollment numbers were not met.

28. Corinthian utilized deceptive direct-mail pieces to lure students to the school, which stated the student had "been APPROVED" for a "CAREER TRAINING ASSESSMENT." *See Exhibit A (Mailer)*. In fact, there was no such Career Training Assessment.

29. The mailers further created a false sense of urgency, stating "URGENT JOB ASSESSMENT UPDATE" and "Please call this number within 7 days." *See Exhibits B and C (Mailers)*.

30. Other mailers claimed prospective students had “been selected” and had “priority status” that was “valid only for the next seven days” and that would only last for the next seven days, instructing students to return the form within that time. *See Exhibit C and D (Mailers)*.

31. In reality, there was no such thing as “priority status,” and no urgency to enroll. No prospective student was turned away after seven days for a “Career Training Assessment” or enrollment. Prospective students arriving at the campus with the mailer for a Career Training Assessment were treated exactly like any other prospective student arriving that day that had not brought in the mailer.

32. Corinthian purposely hired admission representatives with sales experience. Rather than steer prospective students to appropriate fields of study, admissions representatives directed students to unfilled programs. For example, if the Dental Program was not fully enrolled, admissions representatives would direct enrollees to that program, even if the student expressed an interest in the Medical Assistant Program.

33. Students who requested enrollment in a program that was already full were told by admissions representatives to enroll in another program and that the student could later switch their credit hours to their desired program. In fact, credits were not transferrable from one program to another.

34. Everest Milwaukee’s overriding focus was on enrollment. Its admission representatives repeatedly exceeded the enrollment goals set by Corinthian. Everest Milwaukee repeatedly enrolled more students than any other Corinthian school in its region. In fact, Everest Milwaukee had the highest enrollment of any Corinthian school for much of 2011.

35. In January of 2011, the WEAB contacted Corinthian to express its concerns about the over-enrollment well beyond projected numbers, and the ability of the school to educate, train and place those students successfully in careers for which they were trained.

36. The school's first president, Mark Sullivan, assured the WEAB that he was closely monitoring institutional capacity, and that the school would allow for additional staff to be hired and trained to meet the increased needs of the ever-increasing student body.

37. Contrary to representations to the WEAB, enrollment was not slowed. Instead, throughout 2011, Everest Milwaukee continued to enroll about 100 new students per month, far more than the amount represented to the WEAB.

38. Moreover, staff that was hired was inexperienced and/or untrained, compounding an already dire student-attrition problem and graduate placement rate.

39. By June 14, 2012, when the WEAB ordered Everest Milwaukee to indefinitely suspend all enrollments, the school had enrolled roughly 1600 students, far exceeding the school's institutional capacity as represented to the WEAB.

Everest Milwaukee had negligible enrollment standards and high attrition rates.

40. While its enrollment numbers were breaking regional and national records for Corinthian, Everest Milwaukee's student drop-rate was dangerously high and its job placement rate exceedingly low.

41. Over the objections of Corinthian management, President Sullivan utilized background checks for all programs to ensure students who were ready to learn and able to be employed in their chosen field of study were those the school enrolled.

42. President Sullivan requested to utilize entrance exams as a prerequisite to enrollment for the same reasons, but was rebuffed by Corinthian management.

43. In fall of 2011, after President Sullivan abruptly left, the school ceased utilizing background checks and admissions representatives were instructed by the Director of Admissions to call back individuals who had originally been declined enrollment, due to felony convictions, and to attempt to enroll them.

44. As a result, students with drug or violent felony convictions were enrolled in Everest Milwaukee's allied health programs. They could attend classes and attempt to secure an externship to graduate but, their criminal backgrounds would likely disqualify them from employment in the positions for which they were training, including Pharmacy Technician, Medical Assistant or Massage Therapist.

45. Teachers reported that the high student drop-rate was due in large part to the decreasing enrollment standards of the school, as well as the lack of preparedness for an accelerated allied health program.

46. Students were being enrolled despite being plainly incapable of meeting the educational rigors of the program in which they were being enrolled. For example, large numbers of the student body were not proficient in reading, and simply could not be expected to read the advanced medical terminology required of the accelerated curriculum of the allied health programs.

47. Everest Milwaukee utilized an entrance exam for prospective students, but passing the exam was not required for enrollment. Rather, if a student failed any of the three portions of the exam, they were required to receive five hours of tutoring in the subject of each failed section. The maximum number of tutoring hours a student would be required to take was fifteen.

48. According President Sullivan, nearly 50% of the student body required tutoring and there was a single tutor to administer that requirement to hundreds of students.

49. During President Sullivan's tenure, tutoring hours were required to be completed prior to the student's commencement of classes. After his departure, tutoring was allowed to be completed concurrently with the required, accelerated coursework.

50. For a student seriously deficient in basic skills, such as reading, the amount of tutoring provided was wholly inadequate to correct the deficiencies and render the student academically ready to enter their field of study.

51. The Everest Milwaukee tutor repeatedly complained to President Sullivan and his successor President Lester about her tutees' incredibly weak reading skills. The allied health programs were accelerated, and contained difficult medical terminology. The tutor reported that many of her tutees had a second grade reading level or lower, and could not be expected to learn to read *and* master the accelerated material in eight short months.

52. Corinthian management ignored her concerns and those students were permitted to remain in school, and similarly-situated students continued to be enrolled.

53. The tutor specifically recalled one particular enrolled student with a severe learning disability who could not read at all. Complaints about management's decision to allow that student to enroll and take on significant federal student loans were also ignored. The student later dropped out due to her inability to meet the rigors of the program.

54. Students with poor reading skills would have their program tests read to them, or their grades inflated. These included students who, if they graduated, would be expected to work in a doctor's office reading and completing medical charts.

Corinthian misrepresented the availability of externships.

55. As part of all allied health programs each student was required to complete a 200-hour externship to graduate. Corinthian represented to students that externships would be provided and the cost of externship was, in fact, included in the student's tuition.

56. Corinthian explicitly represented to prospective students, both in writing and orally, that the externship was an invaluable component of an Everest Milwaukee education. According to Corinthian, the externship enabled students to practice skills in the students' fields of study.

57. For example, the Everest Milwaukee catalog states: "[t]he [Medical Assistant program] externship provides the student an opportunity to apply principles and practices learned in the program and utilize entry-level medical assisting skills in working with patients."

58. The catalog further states: "[s]erving in an externship at an approved facility gives externs an opportunity to work with the principles and practices learned in the classroom."

59. When students enrolled, Everest Milwaukee representatives guaranteed students that the school would find an externship for the student in their field of study.

60. Everest Milwaukee also represented to students that externships often converted to permanent employment.

61. In the WEAB approval process, Corinthian representatives told the WEAB its goal was to have 50% of externships become permanent employment placements. In reality, Everest Milwaukee did not have enough externships to meet the students' needs..

62. And while Corinthian represented to the WEAB that the school connected with 300 potential Milwaukee-area employers, no meaningful effort had been made to establish the willingness of these employers to hire Everest Milwaukee students.

63. With respect to the Dental Assistant Program, for example, approximately forty students a month needed to be placed in externships. At no point were there more than fifteen externship sites available, and in fact, there were typically less than ten. Thus, nearly two-thirds of Dental Assistant students went without an externship.

64. Some students were forced to find their own externships, or be left with no externship at all.

65. In some instances, Everest Milwaukee allowed students to graduate without completing the required externship—contrary to Everest Milwaukee’s express representations and in violation of the WEAB approval standards and Accrediting Council for Independent Colleges and Schools (“ACICS”) accrediting standards.

66. Students were also placed in externships that did not utilize their specialized skills acquired during their degree program. For instance, Medical Assistant students were placed in nursing homes, where they functioned as nursing aides providing basic care to residents, rather than practicing their specialized program skills.

67. In an email from Regional Vice President of Human Resources Kevin Farrell to Senior Vice President of Operations Bob Botic, Farrell explained that the “major attrition problem” at the Milwaukee campus was “directly related to the lack of intern sights [sic] available for students who have finished their study and need placement. This lack of sights [sic],” he continued “has caused 63 drops in February and 90 in March, primarily the dental program.”

68. Director of Career Services Sona Reican and President Lester had weekly calls with the corporate management of Corinthian, explaining that there were insufficient externship sites, and in particular Dental Assistant sites. Ms. Reican indicated that the caliber of students, in the absence of entrance exams and the elimination of background checks, declined significantly—

making externships and career placement nearly impossible. She suggested that the school decrease enrollment in the Dental Assistant program to allow her to attempt to catch up and get the current students placed.

69. Corinthian ignored the pleas from its local managers and continued to over-enroll students without the means to place them in externships.

Corinthian misrepresented the career services made available to students.

70. Corinthian promised significant help to potential, as well as enrolled, students from its career services department, emphasizing a nationwide network of employers and lifetime support for graduates. Its representations about “career training for life” were critical to consumers’ decision to enroll in Everest Milwaukee.

71. Upon enrollment, students were provided a congratulations letter that promised “Placement assistance throughout your career.”

72. Contrary to the school’s representations, the Career Services Department at Everest Milwaukee was understaffed and ill-equipped to deal with the number of students the school was over-enrolling.

73. The first Director of Career Services had no career services experience in education and lasted only from October 2010 to November 2011, when she walked out without warning.

74. Sona Reican, a more qualified director, was hired in November of 2011, and arrived to her office facing underdeveloped and inadequate career service systems.

75. For months, Ms. Reican was not trained on Corinthian’s internal operation systems and did not have access to the school’s verification placement software. Because of these hindrances, she could not independently review extern and graduate placements—the task at the

core of her role as director. Ms. Reican made repeated requests to resolve these issues, but they went unanswered by Corinthian.

76. When Ms. Reican was hired, she was not fully informed of Everest Milwaukee's dismal placement rates, which, she soon realized, were at 5.5%.

77. Not surprisingly, students report receiving little to no help with their employment search. Some report being given Craigslist advertisements when requesting help in seeking employment openings.

78. Corinthian management knew full well of the problems at Everest Milwaukee, with its Regional Vice President Operations Craig Wood describing them in an email to Executive Vice President of Operations Bob Botic this way: "The problems at Milwaukee were deep seated. [sic] We have been enrolling large numbers of students each month into an Education Department that is not fully prepared to handle them. Additionally, we are now graduating larger and larger classes into the hands of a Career Services department that is ill prepared to help them."

Corinthian misrepresented its job placement success and potential wages of its graduates.

79. A critical part of Corinthian's marketing was the touting of the success of its graduates in finding permanent jobs in the fields in which they received specialized training.

80. From a date unknown to the State, but starting at least in October 2010 and continuing until June 2012, Corinthian's representations and advertisements related to job placement rates were untrue, misleading or both.

81. Corinthian admissions representatives represented to potential, as well as enrolling students, that its job placements rates for its allied health programs nationwide was 80-90%.

82. Corinthian’s President stated that the nationwide placement rate of its graduates was 78%.

83. Corinthian’s website, to which it directed all prospective students, included disclosures of placement rates for each program, for the years 2011 and 2012.

84. The national placement rates disclosed on the website and in the school’s brochures were far less than the 80-90% quoted by administration representatives to enrolling students. *See Exhibits E, F and G. (Program Disclosures)*

85. Corinthian was also required to disclose placement rates for Milwaukee graduates for the years 2011 and 2012.

86. The placement rates disclosed on Corinthian’s website for most of the Milwaukee programs was “N/A,” which according to Corinthian’s website, meant “There was no data to disclose because the program was too new or it is not required to be calculated.”

87. Yet Corinthian was in fact calculating placement rates and regularly providing them to Everest Milwaukee’s accreditor, ACICS, which had been placed Everest Milwaukee on heightened scrutiny because the school’s exceedingly low placement rates.

88. By December 2011, ACICS placed Everest Milwaukee campus on heightened monitoring because the placement rate of Everest Milwaukee fell far below the 65% ACICS placement standards.

89. Corinthian reported the following graduate placement rates for Everest Milwaukee to its accrediting entity—for its five allied health programs:

• Dental Assistant	28.6%
• Medical Administrative Assistant	46.7%
• Medical Assistant	53.7%
• Medical Insurance Billing and Coding	31.8%
• Pharmacy Technician	48.1%

90. During the approval process, Corinthian assured the WEAB that if the school encountered problems with placement, they would address them. "We are in the business of placement," Corinthian officials assured the WEAB. "We will monitor placement weekly."

91. Corinthian failed to alert the WEAB to the heightened monitoring of the school's accreditor, ACICS.

92. In early 2011, the WEAB expressed concerns of its own about the schools' over-enrollment and Corinthian's ability to place its students into jobs. Corinthian falsely represented to the WEAB that it had the capacity to place graduates into jobs.

93. Enrollment beyond institutional capacity, especially in career services, continued for every month Corinthian was enrolling students, and its recruiters reported that the pressure to enroll students never ceased.

94. And even though President Sullivan assured the WEAB the school would monitor its institutional capacity for meeting the needs of the growing student body, the school's placement rate for July 1, 2011 to December 31, 2011 was only 42%, and internal reports reflected as of December of 2011, it dropped to 5%.

95. Corinthian routinely disclosed inflated placement rates at Everest Milwaukee to prospective students and its accreditors.

96. By its own admission, Corinthian included graduates in their placement figures who held positions that were not considered "employment gained as a result of their educational objectives," as defined by Corinthian's own standards.

97. For example, Medical Assistant Program graduates hired into home healthcare positions were regularly being considered placed in their field, even though the specialty training and skills they attained in school are not utilized in those positions.

98. As another example, Corinthian counted as successfully “placed” in his field, a Medical Assistant graduate who was employed as a barber.

99. Yet another Medical Assistant graduate was included in the successfully placed tabulation, but in fact had returned to the same Certified Nursing Assistant position that she had prior to earning her degree.

100. Still other graduates were counted as “employed” despite not finding a job and remaining unemployed during the time they were reported as “employed.”

101. Corinthian was aware of allegations of inflated placement rates, having received reports from two employees about the misconduct. Both of those employees were terminated from their employment soon after alerting management to this false reporting.

102. One of those employees witnessed the manipulation of graduation placement rates, and was asked to manipulate placement numbers as well. She reported this conduct to Regional Vice President Kevin Farrell, who, upon arriving at the campus to investigate the allegations, asked her to resign.

103. Yet another Career Services Representative reported the inaccurate placements to the Director of Career Services Sona Reican, and she was terminated two days later. She then penned a letter to Regional Vice President Kevin Farrell explaining six falsified placements.

104. Regional Vice President Farrell conducted an internal investigation of the seventy placements the school reported to Corinthian management for March of 2012. While he represented to “corporate” that he orally verified placements without proper written verification, some of those purported “verifications” included students who were never employed; employed in temporary positions by a staffing agency; and students employed outside their field of study.

105. In addition to misrepresenting its placement success, Corinthian made false representations to prospective students about the potential for higher wages or salaries with an Everest Milwaukee degree.

106. For instance, Everest Milwaukee recruiters told prospective Medical Assistant and Medical Administrative Assistant students that they would earn wages of between \$16 and \$22 per hour.

107. In fact, when Everest Milwaukee closed its doors in August of 2013, more than 60% of the roughly 1600 students enrolled had dropped out. And of that 40% that had graduated, more than 60% of them were unemployed. Many of those employed graduates are employed out of their field of study, in the job they held prior to enrollment, or are making minimum wage.

108. Few, if any, graduates are earning wages as high as projected by admission representatives.

VIOLATIONS

COUNT I

Fraudulent Representations Wis. Stat. § 100.18(1)

109. Plaintiff re-alleges all preceding paragraphs of the complaint and incorporates them herein.

110. Wisconsin Statute § 100.18(1) prohibits any person or firm, with intent to sell merchandise or a service, from making any assertion, representation or statement of fact which is untrue, deceptive or misleading.

111. In advertisements, on its website, and in written and oral statements made to prospective students, for the purpose of enrolling students in Everest Milwaukee, Corinthian made untrue, deceptive or misleading statements regarding the following:

- a. Everest Milwaukee's success rate in placing its graduates;
 - b. The transferability of credits from one program to another;
 - c. The availability of externships in the students' fields of study, together with the training provided by and employment opportunities accompanying those externships; and
 - d. The earnings Everest Milwaukee graduates could expect to achieve.
112. Each misrepresentation described in this complaint constitutes a separate violation.

COUNT II
Misrepresentation – Mail Solicitations
Wis. Stat. § 100.20 and Wis. Admin. Code § ATCP 127.

113. Plaintiff re-alleges all preceding paragraphs of the complaint and incorporates them herein.

114. At all times relevant to this complaint, Corinthian has been a “seller” of “consumer goods or services” pursuant to Wis. Admin. Code § ATCP 127.01(21), based upon its sale of educational services, which are consumer services within the meaning of Wis. Admin. Code § ATCP 127.01(3).

115. Corinthian's direct-mail marketing pieces sent to prospective students constituted “mail solicitations” within the meaning of Wis. Admin. Code § ATCP 127.30(2), and those solicitations and the subsequent dealings and contracts resulting from them constituted “mail transactions” within the meaning of Wis. Admin. Code § ATCP 127.30(3).

116. Corinthian's sales of educational services to Milwaukee-Everest students who were solicited by means of direct mail constitute “mail transactions” as defined by Wis. Admin. Code § ATCP 127.30(3).

117. Wisconsin Administrative Code § ATCP 127.44(5) provides that no seller, in a direct-mail solicitation may “misrepresent the nature, quantity, material characteristics, performance or efficacy of the goods or services offered or promoted by a seller.”

118. Corinthian committed multiple, separate violations of Wis. Admin. Code § ATCP 127.44(5) by misrepresenting the following to consumers:

- a. The transferability of credits from one program to another;
- b. Everest Milwaukee's success rate in placing its graduates;
- c. The availability of externships in the students' fields of study, together with the training provided by and employment opportunities accompanying those externships; and
- d. The earnings Everest Milwaukee graduates could expect to achieve.

119. Wisconsin Administrative Code § ATCP 127.44(11) provides that no seller, in a direct-mail solicitation may "Misrepresent that the seller is conducting a special sales promotion, is making a special offer limited to a few persons, is making a special offer for a limited period of time."

120. Corinthian committed multiple, separate violations of Wis. Admin. Code § ATCP 127.44(11) by misrepresenting a false sense of urgency to visit the campus for a career assessment and enrollment when no such priority existed.

121. The misrepresentations alleged above also constitute violations of Wis. Admin. Code § ATCP 127.44(15) because they were false, deceptive or misleading.

122. Each misrepresentation described in this complaint constitutes a separate violation.

COUNT III
Misrepresentation – Face-to-Face Solicitations
Wis. Stat. § 100.20 and Wis. Admin. Code § ATCP 127.

123. Plaintiff re-alleges all preceding paragraphs of the complaint and incorporates them herein.

124. At all times relevant to this complaint, Corinthian has been a "seller" of "consumer goods or services" pursuant to Wis. Admin. Code § ATCP 127.01(21), based upon its sale of educational services, which are consumer services within the meaning of Wis. Admin. Code § ATCP 127.01(3).

125. Corinthian's verbal presentations to high school students and others constituted "fact-to-face solicitations" within the meaning of Wis. Admin. Code § ATCP 127.60(1), and those solicitations and the subsequent dealings and contracts resulting from them constituted "face-to-face transactions" within the meaning of Wis. Admin. Code § ATCP 127.60(2).

126. Corinthian's sales of educational services to Everest Milwaukee students who were solicited by means of face-to-face solicitations constitute "face-to-face transactions" as defined by Wis. Admin. Code § ATCP 127.60(2).

127. Wisconsin Administrative Code § ATCP 127.72(5) provides no seller, in a face-to-face transaction, may misrepresent the nature, quantity, material characteristics, performance or efficacy of the goods or services offered or promoted by that seller.

128. Corinthian committed multiple, separate violations of Wis. Admin. Code § ATCP 127.72(5) by misrepresenting the following to consumers in mail transactions:

- a. Everest Milwaukee's success rate in placing its graduates;
- b. The transferability of credits from one program to another;
- c. The availability of externships in the students' fields of study, together with the training provided by and employment opportunities accompanying those externships; and
- d. The earnings Everest Milwaukee graduates could expect to achieve.

129. The misrepresentations alleged above also constitute violations of Wis. Admin. Code § ATCP 127.72(15) because they were false, deceptive or misleading.

130. Each misrepresentation described in this complaint constitutes a separate violation.

PRAYER FOR RELIEF

Plaintiff, State of Wisconsin, demands relief against Defendants as follows:

A. Finding that Defendant violated Wis. Stat. § 100.18 and Wis. Admin. Code §§ ATCP 127.44(5) and (15), and 127.72(5) and (15).

B. Ordering Defendant to restore any pecuniary losses suffered by any person because of Defendant's acts or practices in violation of Wis. Stat. § 100.18(1) or Wis. Admin. Code ch. 127, pursuant to Wis. Stats. §§ 100.18(11) and 100.20(6).

C. Imposing civil forfeitures against Defendant in the amount of not less than \$50.00 nor more than \$200.00 for each violation of Wis. Stat. § 100.18(1), and not less than \$100.00 nor more than \$10,000.00 for each violation of Wis. Admin. Code ch. ATCP 127, pursuant to Wis. Stats. §§ 100.20(6) and 100.26(6), plus all applicable assessments.

D. Entering appropriate injunctive relief prohibiting further violations of law.

E. Awarding the State, pursuant to Wis. Stat. § 100.263, the expenses of investigation and prosecution, including attorneys fees, relating to enforcement of Defendants' violations of Wis. Stat. § 100.18(1).

F. Providing such other and further equitable relief as justice and equity may require.

Dated this 27 day of October, 2014.

Respectfully submitted,

J.B. VAN HOLLEN
Attorney General



LARA SUTHERLIN
Assistant Attorney General
State Bar #1057096

Attorneys for State of Wisconsin

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857

STATUS INFORMATION

Everest COLLEGE

Wisconsin Resident Career Training and Assistance

1311 N. 6th Street Milwaukee, WI 53212 www.4skillsgo2everest.com

Your Status: [X] APPROVED [] REJECTED Affix this label to reply form below

<<US Monitor>> John Sample 123 Main St Anytown, WI 12345

Dear John,

You have been APPROVED.

Recently your name appeared on our list of Milwaukee-area persons who are "APPROVED." That means you are entitled to receive a CAREER TRAINING ASSESSMENT about career training programs open for enrollment now at Everest College in Milwaukee.

CAREER TRAINING ASSESSMENT

Please call this number within 7 days: 1-800-123-4567 Tell the representative your Approval I.D. Code (see red box at top) Call between 9 a.m. and 5 p.m., Monday - Friday

CALL 1-800-123-4567 or mail the Request Form for NEW information about your options:

- Financial assistance to pay for training. Financial aid is available for those who qualify. Help with finding employment after graduation. Everest College gives you career placement assistance immediately after you complete your career training, and whenever you need it later to help you find employment. (All our graduates have access to our full time Career Services department.)

This phone consultation for Wisconsin residents is a SERVICE. There is NO obligation.

When you call, Everest College representatives can put you in touch with a student finance planner who can give you updated information about money that may be available to help pay for all or part of your career training cost. Financial aid is available for those who qualify. You can ask questions about different careers now open for training: What training do you need and/or what do employers look for? You can learn about programs with flexible class schedules - evening and weekend classes** - where you can get real hands-on experience.

Please call within the next 7 days. It only takes a few minutes to hear about your options for career training that can help you learn the skills you need for a rewarding career towards a brighter future.

Authorized by: Brad Buchanan, Executive Vice President

P.S. Call 1-800-123-4567 to get answers fast. Or just complete and return the REQUEST for INFORMATION form below in the next 7 days. (Put your Approval I.D. Code on the form before you mail it.) Or visit www.4skillsgo2everest.com.

* Your own hard work, professionalism, experience, work attitude, local market and other factors will impact your personal employment opportunities and pay. ** Programs and schedules vary by campus. ACICS

64_ACR 0311

(CO)ACR-F 0311

REQUEST for INFORMATION

YES! I want to learn more about my options for training for a new career that is rewarding and could lead to a brighter future. Please tell me about: The "Everest 7-Point Advantage" (see other side), payment help, and career placement assistance. Call 1-800-123-4567

Place your Approval I.D. Code (red label) here

NO obligation.

Your Approval I.D. Code [Barcode]

Name and address on file: John Sample 123 Main St Anytown, WI 12345

Complete the following: Primary Phone (this is important): () Other Phone: ()

E-mail:

Learn about training for:

- Medical Assistant
Medical Insurance Billing and Coding
Dental Assistant
Pharmacy Technician
Medical Administrative Assistant
Not Sure

I have: High School Diploma GED Neither

Not Sure Which
Career Path Is Best For You,
John Sample?
That's A Great Reason
To Call Today:
1-800-123-4567

John, you have more options than you may think. Call us today, and you'll speak immediately with an admissions representative who will match your skills and interests with one of the career paths listed below. Then, you can be on your way to a brighter future...

- Medical Assistant
- Medical Insurance Billing and Coding
- Dental Assistant
- Pharmacy Technician
- Medical Administrative Assistant

There's No Cost,
No Obligation.
Call Toll-Free:
1-800-123-4567

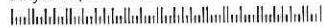
Everest
COLLEGE
www.4skillsgo2everest.com

URGENT JOB ASSESSMENT UPDATE

CALL 1-800-123-4567 FOR YOUR NO-COST, JOB-RELATED ASSESSMENT.

AUTHORIZED FOR NO-COST ASSESSMENT:

«US Monitor»
John Sample
123 Main St
Anytown, WI 12345



John, this Job Assessment
Update is for authorized
Wisconsin residents.
This is a great time to call us.

WHEN YOU CALL 1-800-123-4567, YOU'LL NEED THIS AUTHORIZATION CODE: 577830

Dear John,

You are among a group of Wisconsin residents who have been authorized for a professional Job-Related Assessment at NO COST TO YOU. This could be the perfect time to learn how you can make your move to a better future in a matter of **months, NOT YEARS.**

John, we believe you're the kind of individual with the skills we can develop to help you qualify for a better job.* And we're ready to help you every step of the way. But you need to take the first step.

Call 1-800-123-4567 Within 10 Days
For Your NO-COST, JOB-RELATED ASSESSMENT
With Our Admissions Representative

1. You'll learn which of your skills are in demand by employers these days.
2. You'll discover how our real-world, hands-on training can convert your most sought-after skills into a more rewarding career.
3. That's it. There's no obligation. What happens next is up to you.

Just give us the go-ahead to get started. We'll help you find money to help pay for your training. Financial aid is available for those who qualify. And many of our students qualify.

Turn over, please...

* Your own hard work, professionalism, experience, work attitude, local market and other factors will impact your personal employment opportunities and pay. ACICS
For more information about our graduation rates, the median debt of students who completed the program and other important information, please visit our website at www.everest.edu/disclosures.

30_JOB 0711

(CO)JOB-F 0711

TO GET STARTED FASTER, CALL 1-800-123-4567

YES, please call me for my No-Cost, Job-Related Assessment. I understand I am under NO OBLIGATION.

John Sample
123 Main St
Anytown, WI 12345
(Please correct if necessary)

**NO COST
NO OBLIGATION**

Training starts soon for: (check the one that most interests you)

- Medical Assistant
- Medical Insurance Billing and Coding
- Dental Assistant
- Pharmacy Technician
- Medical Administrative Assistant
- Not Sure

PRIMARY PHONE: _____

CELL or OTHER PHONE: _____

E-MAIL: _____

I have: High School Diploma GED Neither

Everest College
1311 N. 6th Street, Milwaukee, WI 53212
CHESIVELE.COM | 800.123.4567 | 414.224.2244 | 414.224.2244 | 414.224.2244

Exhibit B

STATUS INFORMATION

Wisconsin Resident
Career Training and Assistance



1311 N. 6th Street
Milwaukee, WI 53212
www.go2everest.com

Your Status:
 APPROVED REJECTED

Position only for label
Do not print blue line.

▲ Affix this label to reply form below ▲

«US Monitor»
 John Sample
 123 Main St
 Anytown, WI 12345



Dear John,

You have been APPROVED.

Recently your name appeared on our list of Milwaukee-area persons who are "APPROVED." That means if you've earned a High School Diploma or GED, you are entitled to receive a CAREER TRAINING ASSESSMENT about career training programs open for enrollment now at Everest College in Milwaukee.

CAREER TRAINING ASSESSMENT

Please call this number within 7 days: 1-800-123-4567

Tell the representative your Approval I.D. Code (see red box at top)

Call between 9 a.m. and 5 p.m., Monday - Friday

CALL 1-800-123-4567 or mail the Request Form for NEW information about your options:

- Financial assistance to pay for training. Financial aid is available for those who qualify.
- Help with finding a job. Everest College gives you assistance immediately after you complete your career training, and whenever you need it later to help you find employment. (All our graduates have access to our full time Career Services department.)

This phone consultation for Wisconsin residents is a SERVICE. There is NO obligation.

When you call, Everest College representatives can put you in touch with a student finance planner who can give you updated information about money that may be available to help pay for all or part of your career training cost. Financial aid is available for those who qualify. You can ask questions about different careers now open for training: What education or training do you need beyond your High School Diploma or GED? What do employers look for? You can learn about programs with flexible class schedules — evening and weekend classes** — where you can get real hands-on experience that will build on what you have already accomplished in your life.

Please call within the next 7 days. It only takes a few minutes to hear about your options for career training that can further your education and help you learn the skills you need for a rewarding career with better pay.

Authorized by:

Brad Buchanan, Executive Vice President

P.S. Call 1-800-123-4567 to get answers fast. Or just complete and return the REQUEST for INFORMATION form below in the next 7 days. (Put your Approval I.D. Code on the form before you mail it.) Or visit www.go2everest.com.

* Your own hard work, professionalism, experience, work attitude, local market and other factors will impact your personal employment opportunities and pay.
 ** Programs and schedules vary by campus.
 ACICS

250_ACR_BT 1110


(CO)ACR-BTF 1110

REQUEST for INFORMATION

YES! I want to learn more about my options for training for a new career that is rewarding and could lead to better pay. Please tell me about: The "Everest 7-Point Advantage" (see other side), payment help, and career placement assistance.
 Call 1-800-123-4567. Or mail this request within the next 7 days.

▶ Place your Approval I.D. Code (red label) here

NO obligation.

Your Approval I.D. Code 

▶ Learn about training for:

- Medical Assistant
- Medical Insurance Billing and Coding
- Dental Assistant
- Not Sure

▶ Name and address on file: John Sample
 123 Main St
 Anytown, WI 12345

▶ Complete the following:
 Primary Phone (this is important): (_____) _____

Other Phone: (_____) _____

E-mail: _____

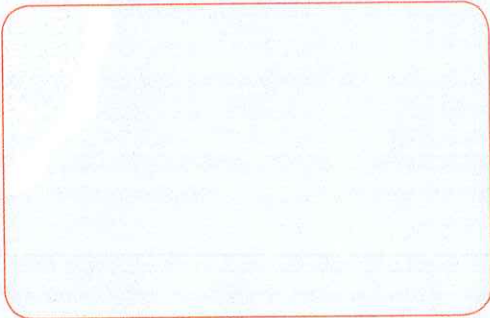
▶ I have:

- High School Diploma
- GED
- Neither

«CREATIVE CODE» «SCH CODE» «ADKEY» «ADKEY» «LEAD ID» «LEAD ID»
 Cell Code «Cell Code» «INFOLURE JOB#» «INFOLURE SOL ID» «MSP SEQUENCE»

Everest COLLEGE

«US Monitor»
John Sample
123 Main St
Anytown, WI 12345



Use your cell phone or home phone to call us as soon as you receive this. If the line is busy, redial right away. Don't miss your priority opportunity.

Dear John,

If you're unemployed - or working at a job you don't love - call us.

We can help you find a better, more rewarding career, and a job you'll actually enjoy, by taking advantage of specific career training at Everest College.

- WE'VE HELPED OVER 200,000 PEOPLE - many just like you - train for jobs in in-demand* fields. How? By following our "5 Steps to Success," the proven approach to a better next career. Here's why it works:
1. We focus only on in-demand professions with above average employment opportunities so you don't face a dead-end field.
2. We concentrate on what you need to know with training designed to help you get into the workforce as quickly as possible.
3. You get current, real-world, hands-on experience - the practical training that today's employers look for.
4. We work closely with hiring companies - they list open positions with our Career Services department.
5. Once you graduate, we actually help you find your new job and have ongoing career services assistance as you move up the career ladder.



We know how to prepare you for a better future. We've helped over 200,000 people succeed. Now it's your turn. You can do this. Put our proven approach to work for you.

Call us today at 1-800-123-4567. Classes start frequently and financial aid is available for those who qualify. But hurry, your priority status is valid for only the next seven days.

Sincerely,

Brad Buchanan (signature)

Brad Buchanan
Executive Vice President

*Your own hard work, professionalism, experience, work attitude, local market and other factors will impact your personal employment opportunities and pay.
ACICS

133_PRO 0211

(CO)PRO-F 0211

Call 1-800-123-4567 now for fast service.

Or return this form within 7 days.

"5 Steps to Success" for John Sample

YES, I'm ready for a brighter future. Tell me more about how I can make the "5 Steps to Success" work for me. I understand there is no cost or obligation.

PLEASE MAKE ANY CORRECTIONS:
John Sample
123 Main St
Anytown, WI 12345

PRIMARY PHONE
OTHER PHONE
E-MAIL

Check the one that most interests you:

- Medical Assistant
Dental Assistant
Medical Administrative Assistant
Medical Insurance Billing and Coding
Pharmacy Technician
Not Sure

I have: High School Diploma GED Neither

1311 N. 6th Street
Milwaukee, WI 53212

«CREATIVE CODE» School «SCH_CODE» Adkey «ADKEY» Lead ID «LEAD ID»
Cell Code «Cell Code» «NFOLURE JOB#» «NFOLURE SOL ID» «MSP SEQUENCE»

Everest College, Milwaukee

The following program disclosures are provided pursuant to federal regulations effective July 1, 2011.

"Occupation" data reflects the type of occupations the program generally prepares students to enter. (For government data regarding occupations, please navigate to www.onetonline.org.) To the extent permitted under the standards of the applicable accrediting agency or state agency, the placement rates reported below may reflect students that completed the program and obtained employment in one of the occupations listed in the standard occupational titles below or other occupations that utilize the core skills taught in the program.

"On-Time Completion Rate" reflects the percent of graduates between July 1, 2009, and June 30, 2010 who completed their program within 100 percent of the normal timeframe as described in the school catalog or enrollment agreement.

"Costs to Students" reflects the current costs of the academic program for students completing the program on time, including tuition and fees, estimated books and supplies, and if applicable, room and board. Costs do not reflect potential increases.

"Placement Rates" reflects the percent of graduates securing employment as calculated pursuant to applicable state agencies', institutional accrediting agencies' or programmatic accrediting agencies' required calculation methodologies. Each agency has different criteria in determining what constitutes a placement and these placements may or may not be listed in the standard occupations listed below. (For more information about calculations and timeframes, refer to the descriptions at the end of this disclosure.)

"Median Loan Debt" reflects the median loan debt incurred by students who completed the program, between July 1, 2009, and June 30, 2010, including Title IV program loans, private educational loans and institutional financing plans.

Unless otherwise noted below, the data included in this disclosure are for the entire educational institution as defined by the Department of Education, which may include a number of individual campus locations (even in different states) and both online and physical delivery modalities. See footnotes for a list of the campuses included in the institution. In many cases, the on-time completion rate, the cost to students, the placement rate and the median loan debt may differ (often significantly) between these physical locations and delivery modalities. The data below reflect averages for all students in all locations and delivery modalities (or, in the case of program cost, the ranges of program costs) across all locations and delivery modalities.

These disclosures are available online at www.everest.edu/disclosures.

Business (Associate)		
Occupation (Title, SOC Code)	First-Line Supervisors/Managers of Non-Retail Sales Workers	41-1012
	First-Line Supervisors/Managers of Retail Sales Workers	41-1011
	Managers	11-9199
	Sales & Related Workers	41-9099
	Sales Representatives, Services	41-3099
Cost to Students		
Institution	Tuition and Fees	\$32,352 to \$43,872
	Books and Supplies	\$0 to \$3,440
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$33,639
	Books and Supplies	\$3,440
	Room and Board	N/A
On-Time Completion Rate		12%
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	83.3% to 100%
	State	83.3% to 95.24%
Milwaukee Campus	Institutional Accreditor	N/A
Median Loan Debt	Title IV Program Loans	\$28,805
	Private Education Loans	\$0
	Institutional Financing Plans	\$0

Criminal Justice (Associate)		
Occupation (Title, SOC Code)	Security Officer/ Guards	33-9032
Cost to Students		
Institution	Tuition and Fees	\$32,352 to \$43,872
	Books and Supplies	\$0 to \$3,400
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$33,639
	Books and Supplies	\$2,937
	Room and Board	N/A

Criminal Justice (Associate)		
On-Time Completion Rate		14%
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	45.5% to 64.3%
	State	35.7% to 64.29%
Milwaukee Campus	Institutional Accreditor	N/A
Median Loan Debt	Title IV Program Loans	\$28,123
	Private Education Loans	\$0
	Institutional Financing Plans	\$0

Dental Assistant (Diploma)		
Occupation (Title, SOC Code)	Dental Assistants	31-9091
Cost to Students		
Institution	Tuition and Fees	\$15,842
	Books and Supplies	\$869
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,842
	Books and Supplies	\$869
	Room and Board	N/A
On-Time Completion Rate		New Program
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	N/A
Milwaukee Campus	Institutional Accreditor	N/A
Median Loan Debt	Title IV Program Loans	N/A
	Private Education Loans	N/A
	Institutional Financing Plans	N/A

Massage Therapy (Diploma)		
Occupation (Title, SOC Code)	Massage Therapists	31-9011
Cost to Students		

Massage Therapy (Diploma)		
Institution	Tuition and Fees	\$15,842 to \$18,012
	Books and Supplies	\$1,372 to \$1,398
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,842
	Books and Supplies	\$1,398
	Room and Board	N/A
On-Time Completion Rate		59%
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	41.5% to 53%
	State	40.48% to 52.38%
Milwaukee Campus	Institutional Accreditor	N/A
Median Loan Debt	Title IV Program Loans	\$9,310
	Private Education Loans	\$0
	Institutional Financing Plans	\$0

Medical Administrative Assistant (Diploma)		
Occupation (Title, SOC Code)	Medical Assistants	31-9092
	Medical Secretaries	43-6013
Cost to Students		
Institution	Tuition and Fees	\$15,842 to \$18,180
	Books and Supplies	\$1,375 to \$1,425
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,842
	Books and Supplies	\$1,398
	Room and Board	N/A
On-Time Completion Rate		54%
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	41% to 62.5%
	State	37.2% to 56.82%
Milwaukee Campus	Institutional Accreditor	N/A

Medical Administrative Assistant (Diploma)		
Median Loan Debt	Title IV Program Loans	\$9,310
	Private Education Loans	\$329
	Institutional Financing Plans	\$0

Medical Assistant (Diploma)		
Occupation (Title, SOC Code)	Medical Assistants	31-9092
Cost to Students		
Institution	Tuition and Fees	\$18,880 to \$21,641
	Books and Supplies	\$1,261 to \$1,630
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$18,880
	Books and Supplies	\$1,494
	Room and Board	N/A
On-Time Completion Rate		42%
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	55.2% to 58.1%
	Programmatic Accreditor	56.98% to 61.9%
	State	49.7% to 52.2%
Milwaukee Campus	Institutional Accreditor	N/A
	Programmatic Accreditor	N/A
Median Loan Debt	Title IV Program Loans	\$9,310
	Private Education Loans	\$305
	Institutional Financing Plans	\$0

Medical Insurance Billing and Coding (Diploma)		
Occupation (Title, SOC Code)	Medical Records and Health Information Technicians	29-2071
Cost to Students		
Institution	Tuition and Fees	\$15,842
	Books and Supplies	\$1,851
	Room and Board	N/A

Medical Insurance Billing and Coding (Diploma)		
Milwaukee Campus	Tuition and Fees	\$15,842
	Books and Supplies	\$1,851
	Room and Board	N/A
On-Time Completion Rate		New Program
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	N/A
Milwaukee Campus	Institutional Accreditor	N/A
Median Loan Debt	Title IV Program Loans	N/A
	Private Education Loans	N/A
	Institutional Financing Plans	N/A

Pharmacy Technician (Diploma)		
Occupation (Title, SOC Code)	Pharmacy Technicians	29-2052
Cost to Students		
Institution	Tuition and Fees	\$15,842 to \$18,255
	Books and Supplies	\$853 to \$888
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,842
	Books and Supplies	\$853
	Room and Board	N/A
On-Time Completion Rate		New Program
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	N/A
	State	N/A
Milwaukee Campus	Institutional Accreditor	N/A
Median Loan Debt	Title IV Program Loans	N/A
	Private Education Loans	N/A
	Institutional Financing Plans	N/A

Footnotes:

Institutional Accreditor - Accrediting Council for Independent Colleges and Schools (ACICS) uses the following formula to calculate placement for accredited institutions: placed in a field of study plus placed in a field related to study divided by the number of graduates and completers minus those unavailable for work. Placed in a field of study involves the direct use of the skills taught in the program. Placed in a field related to study involves an indirect use of the skills taught in the program. Time Frame: July 1, 2009 through June 30, 2010.

Programmatic Accreditor - The Medical Assistant program is accredited by the Commission on Accreditation of Allied Health Education Programs (www.caahep.org) upon the recommendation of the Medical Assisting Education Review Board (MAERB). MAERB uses the following formula to calculate placement for accredited programs: number of graduates employed full or part-time in a related field, as well as those continuing their education or serving in the military, divided by number of graduates. Time Frame: January 1, 2005, through December 31, 2009.

State - Florida Commission on Independent Education calculation for placement rate: placed in a field of study plus placed in a field related to study divided by the number of graduates minus those unavailable for work. Time Frame: July 1, 2009, through June 30, 2010.

Placement Rate N/A - There is no data to disclose because this program is too new or is not required to be calculated.

Median Load Debt N/A - Per Education Department guidance, data not provided due to fewer than ten completers or program is too new.

This Institution Includes:

- Everest College, Milwaukee
- Everest University, Brandon
- Everest University, Orange Park
- Everest University, Tampa

Program Disclosures

Everest College, Milwaukee

The following program disclosures are provided pursuant to federal law.

"Occupation" data reflects the type of occupations the program generally prepares students to enter. (For government data regarding occupations, please navigate to www.onetonline.org.) To the extent permitted under the standards of the applicable accrediting agency or state agency, the placement rates reported below may reflect students who completed the program and obtained employment in one of the occupations listed in the standard occupational titles below or other occupations that utilize the core skills taught in the program.

"On-Time Completion Rate" reflects the percent of graduates between July 1, 2010, and June 30, 2011, who completed their program within 100 percent of the normal time frame as described in the school catalog or enrollment agreement.

"Costs to Students" reflects the costs of the academic program for students completing the program on time, including tuition and fees, estimated books and supplies, and if applicable, room and board. Costs do not reflect potential increases and are current as of the publication date of this disclosure.

"Placement Rates" reflects the percent of graduates securing employment as calculated pursuant to the required calculation methodologies and time frames of the applicable state agencies, institutional accrediting agencies or programmatic accrediting agencies. Each agency has different criteria in determining what constitutes a placement, and these placements may or may not be listed in the standard occupations listed below. (For more information about calculations and time frames, refer to the descriptions at the end of this disclosure.)

"Median Loan Debt" reflects the median loan debt incurred by students who completed the program, between July 1, 2009, and June 30, 2010, including Title IV program loans, private educational loans and institutional financing plans.

Unless otherwise noted below, the data included in this disclosure are for the entire educational institution as defined by the Department of Education, which may include a number of individual campus locations (even in different states) and both online and physical delivery modalities. See footnotes for a list of the campuses included in the institution. In many cases, the on-time completion rate, the cost to students, the placement rate and the median loan debt may differ (often significantly) between these physical locations and delivery modalities. The data below reflect averages for all students in all locations and delivery modalities (or, in the case of program cost, the ranges of program costs) across all locations and delivery modalities.

Dental Assistant (Diploma)		
Occupation (Title, SOC Code)	Dental Assistants	31-9091
Cost to Students		
Institution	Tuition and Fees	\$15,803
	Books and Supplies	\$907
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,803.00
	Books and Supplies	\$906.97
	Room and Board	N/A
On-Time Completion Rate		N/A
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	20%
	State	20%
Milwaukee Campus	Institutional Accreditor	20%
	State	20%
Median Loan Debt	Title IV Program Loans	N/A
	Private Education Loans	N/A
	Institutional Financing Plans	N/A

Massage Therapy (Diploma)		
Occupation (Title, SOC Code)	Massage Therapists	31-9011
Cost to Students		
Institution	Tuition and Fees	\$17,298 to \$18,012
	Books and Supplies	\$1,421 to \$1,442
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$17,298.00
	Books and Supplies	\$1,423.11
	Room and Board	N/A
On-Time Completion Rate		64.29%
Placement Rates (See footnotes)		

Massage Therapy (Diploma)		
Institution	Institutional Accreditor	66.7% to 69.2%
	State	66.7% to 69.2%
Milwaukee Campus	Institutional Accreditor	N/A
	State	N/A
Median Loan Debt	Title IV Program Loans	\$9,310
	Private Education Loans	\$0
	Institutional Financing Plans	\$0

Medical Administrative Assistant (Diploma)		
Occupation (Title, SOC Code)	Medical Assistants	31-9092
	Medical Secretaries	43-6013
Cost to Students		
Institution	Tuition and Fees	\$15,803 to \$18,180
	Books and Supplies	\$1,398 to \$1,746
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,803.00
	Books and Supplies	\$1,483.33
	Room and Board	N/A
On-Time Completion Rate		54.32%
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	61.1% to 62.2%
	State	57.8% to 64.1%
Milwaukee Campus	Institutional Accreditor	N/A
	State	N/A
Median Loan Debt	Title IV Program Loans	\$9,310
	Private Education Loans	\$329
	Institutional Financing Plans	\$0

Medical Assistant (Diploma)		
Occupation (Title, SOC Code)	Medical Assistants	31-9092

Medical Assistant (Diploma)		
Cost to Students		
Institution	Tuition and Fees	\$18,841 to \$21,841
	Books and Supplies	\$1,589 to \$1,853
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$18,841.00
	Books and Supplies	\$1,588.96
	Room and Board	N/A
On-Time Completion Rate		55.08%
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	57.2% to 65.6%
	Programmatic Accreditor	40.91% to 62.18%
	State	57.8% to 64.85%
Milwaukee Campus	Institutional Accreditor	N/A
	Programmatic Accreditor	40.91%
	State	N/A
Median Loan Debt	Title IV Program Loans	\$9,310
	Private Education Loans	\$305
	Institutional Financing Plans	\$0

Medical Insurance Billing and Coding (Diploma)		
Occupation (Title, SOC Code)	Medical Records and Health Information Technicians	29-2071
Cost to Students		
Institution	Tuition and Fees	\$15,803
	Books and Supplies	\$1,962
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,803.00
	Books and Supplies	\$1,962.33
	Room and Board	N/A
On-Time Completion Rate		N/A
Placement Rates (See footnotes)		

Medical Insurance Billing and Coding (Diploma)		
Institution	Institutional Accreditor	0%
	State	0%
Milwaukee Campus	Institutional Accreditor	0%
	State	0%
Median Loan Debt	Title IV Program Loans	N/A
	Private Education Loans	N/A
	Institutional Financing Plans	N/A

Pharmacy Technician (Diploma)		
Occupation (Title, SOC Code)	Pharmacy Technicians	29-2052
Cost to Students		
Institution	Tuition and Fees	\$15,803 to \$18,255
	Books and Supplies	\$910 to \$915
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,803.00
	Books and Supplies	\$910.19
	Room and Board	N/A
On-Time Completion Rate		75.68%
Placement Rates (See footnotes)		
Institution	Institutional Accreditor	76.5%
	State	82.35%
Milwaukee Campus	Institutional Accreditor	N/A
	State	N/A
Median Loan Debt	Title IV Program Loans	N/A
	Private Education Loans	N/A
	Institutional Financing Plans	N/A

Footnotes:

Institutional Accreditor - ACICS uses the following formula to calculate placement for accredited institutions: placed in a field of study plus placed in a field related to study divided by the number of graduates and completers minus those unavailable for work. Placed in a field of study involves the direct use of the skills taught in the program. Placed in a field related to study involves an indirect use of the skills taught in the program. Time Frame: July 1, 2009 through June 30, 2010.

Programmatic Accreditor - ABHES uses the following formula to calculate placement for accredited institutions: graduates placed in a field of study plus placed in a field related to study divided by the number of graduates and completers minus those unavailable for work. Time Frame: July 1, 2009 through June 30, 2010.

State - Commission on Independent Education calculation for placement rate: number of graduates placed divided by number of graduates less employed in military or continuing education. Time Frame: July 1, 2010 through June 30, 2011.

State - Wisconsin Educational Approval Board calculation for placement rate: number of graduates employed divided by number of graduates. Time Frame: July 1, 2010 through June 30, 2011.

Placement Rate N/A - There is no data to disclose because this program is too new or is not required to be calculated.

On-Time Completion N/A - Per Education Department guidance, data not provided due to fewer than ten completers or program is too new.

Median Load Debt N/A - Per Education Department guidance, data not provided due to fewer than ten completers or program is too new.

This Institution Includes:

- Everest College, Milwaukee
- Everest University, Brandon
- Everest University, Orange Park
- Everest University, Tampa

Program Disclosures

Everest College, Milwaukee

The following program disclosures are provided pursuant to federal law.

"Occupation" data reflects the type of occupations the program generally prepares students to enter. (For government data regarding occupations, please navigate to www.onetonline.org.) To the extent permitted under the standards of the applicable accrediting agency or state agency, the placement rates reported below may reflect students who completed the program and obtained employment in one of the occupations listed in the standard occupational titles below or other occupations that utilize the core skills taught in the program.

"On-Time Completion Rate" reflects the percent of graduates between July 1, 2012, and June 30, 2013, who completed their program within 100 percent of the normal time frame as described in the school catalog or enrollment agreement.

"Costs to Students" reflects the costs of the academic program for students completing the program on time, including tuition and fees, estimated books and supplies, and if applicable, room and board. Costs do not reflect potential increases and are current as of the publication date of this disclosure.

"Placement Rates" reflects the percent of graduates securing employment as calculated pursuant to the required calculation methodologies and time frames of the applicable state agencies, institutional accrediting agencies or programmatic accrediting agencies. Each agency has different criteria in determining what constitutes a placement, and these placements may or may not be listed in the standard occupations listed below. (For more information about calculations and time frames, refer to the descriptions at the end of this disclosure.)

"Median Loan Debt" reflects the median loan debt incurred by students who completed the program, between July 1, 2011, and June 30, 2012, including Title IV program loans, private educational loans and institutional financing plans.

Unless otherwise noted below, the data included in this disclosure are for the entire educational institution as defined by the Department of Education, which may include a number of individual campus locations (even in different states) and both online and physical delivery modalities. See footnotes for a list of the campuses included in the institution. In many cases, the on-time completion rate, the cost to students, the placement rate and the median loan debt may differ (often significantly) between these physical locations and delivery modalities. The data below reflect averages for all students in all locations and delivery modalities (or, in the case of program cost, the ranges of program costs) across all locations and delivery modalities.

Dental Assistant (Diploma)		
Occupation (Title, SOC Code)	Dental Assistants	31-9091
Cost to Students		
Institutions	Tuition and Fees	\$15,803
	Books and Supplies	\$907
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,803.00
	Books and Supplies	\$906.97
	Room and Board	N/A
On-Time Completion Rate		9.09%
Placement Rates (See footnotes)		
Institutions	Institutional Accreditor	20%
	State	20%
Milwaukee Campus	Institutional Accreditor	20%
	State	20%
Median Loan Debt	Title IV Program Loans	N/A
	Private Education Loans	N/A
	Institutional Financing Plans	N/A

Massage Therapy (Diploma)		
Occupation (Title, SOC Code)	Massage Therapists	31-9011
Cost to Students		
Institutions	Tuition and Fees	\$17,298 to \$18,012
	Books and Supplies	\$1,421 to \$1,442
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$17,298.00
	Books and Supplies	\$1,423.11
	Room and Board	N/A
On-Time Completion Rate		67.05%
Placement Rates (See footnotes)		

Massage Therapy (Diploma)		
Institutions	Institutional Accreditor	66.7% to 69.2%
	State	66.7% to 69.2%
Milwaukee Campus	Institutional Accreditor	N/A
	State	N/A
Median Loan Debt	Title IV Program Loans	\$9,454
	Private Education Loans	\$2,563
	Institutional Financing Plans	\$0

Medical Administrative Assistant (Diploma)		
Occupation (Title, SOC Code)	Medical Assistants	31-9092
	Medical Secretaries	43-6013
Cost to Students		
Institutions	Tuition and Fees	\$15,803 to \$18,180
	Books and Supplies	\$1,398 to \$1,746
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,803.00
	Books and Supplies	\$1,483.33
	Room and Board	N/A
On-Time Completion Rate		18.37%
Placement Rates (See footnotes)		
Institutions	Institutional Accreditor	61.1% to 62.2%
	State	57.8% to 64.1%
Milwaukee Campus	Institutional Accreditor	N/A
	State	N/A
Median Loan Debt	Title IV Program Loans	\$9,454
	Private Education Loans	\$2,236
	Institutional Financing Plans	\$0

Medical Assistant (Diploma)		
Occupation (Title, SOC Code)	Medical Assistants	31-9092

Medical Assistant (Diploma)		
Cost to Students		
Institutions	Tuition and Fees	\$18,841 to \$21,641
	Books and Supplies	\$1,589 to \$1,853
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$18,841.00
	Books and Supplies	\$1,588.96
	Room and Board	N/A
On-Time Completion Rate		21.38%
Placement Rates (See footnotes)		
Institutions	Institutional Accreditor	57.2% to 65.6%
	Programmatic Accreditor	40.91% to 62.18%
	State	57.8% to 64.85%
Milwaukee Campus	Institutional Accreditor	N/A
	Programmatic Accreditor	40.91%
	State	N/A
Median Loan Debt	Title IV Program Loans	\$9,454
	Private Education Loans	\$2,576
	Institutional Financing Plans	\$0

Medical Insurance Billing and Coding (Diploma)		
Occupation (Title, SOC Code)	Medical Records and Health Information Technicians	29-2071
Cost to Students		
Institutions	Tuition and Fees	\$12,936 to \$15,803
	Books and Supplies	\$1,962 to \$2,022
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,803.00
	Books and Supplies	\$1,962.33
	Room and Board	N/A
On-Time Completion Rate		35.29%
Placement Rates (See footnotes)		

Medical Insurance Billing and Coding (Diploma)		
Institutions	Institutional Accreditor	0%
	State	0%
Milwaukee Campus	Institutional Accreditor	0%
	State	0%
Median Loan Debt	Title IV Program Loans	N/A
	Private Education Loans	N/A
	Institutional Financing Plans	N/A

Pharmacy Technician (Diploma)		
Occupation (Title, SOC Code)	Pharmacy Technicians	29-2052
Cost to Students		
Institutions	Tuition and Fees	\$15,803 to \$43,844
	Books and Supplies	\$910 to \$3,400
	Room and Board	N/A
Milwaukee Campus	Tuition and Fees	\$15,803.00
	Books and Supplies	\$910.19
	Room and Board	N/A
On-Time Completion Rate		34.21%
Placement Rates (See footnotes)		
Institutions	Institutional Accreditor	63.6% to 76.5%
	State	63.6% to 82.35%
Milwaukee Campus	Institutional Accreditor	N/A
	State	N/A
Median Loan Debt	Title IV Program Loans	N/A
	Private Education Loans	N/A
	Institutional Financing Plans	N/A

Footnotes:

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