EXHIBIT

1
DECLARATION OF BILLEE STARR AVINGTON

I, Billee Starr Avington, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from January 2010 until September 2010. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Community Home Health (CHH) program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with about $10,000 in federal student loans that I cannot afford. I also had to pay $88 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in community home health.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in community home health. This was supposed to include the knowledge I would need to pass the certification exam.

8. They also told me that if I attended and graduated from RSHT, I would be eligible to make a good living. They told me that my certification would allow me to run my own home health care business, and that I would be successful because it was a booming industry. They also told me that RSHT’s career services office would give me extensive assistance in finding a job.

9. The school helped me complete my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.
12. I learned near the end of the CHH program that there is no such thing as certification in “community home health” in Virginia and that RSHT did not know what certification examination I and the other CHH students would take. After I graduated the school decided that we should take the Patient Care Technician certification exam. The exam tested skills that we did not learn at RSHT, such as skills related to taking blood and EKG tests, and as a result I did not pass.

13. I and many other CHH students were very upset with how RSHT handled the CHH program and the certification issue. We complained, and the school enrolled us in a six-week Certified Nurse Aide Training Program at another school, the Professional Career Institute. It cost RSHT less than $1000 to enroll me in that program, but RSHT did not refund any of the more than $10,000 I had paid for the CHH program.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

15. Another problem with RSHT was inadequate classroom space. CCH did not have its own classroom so we would have to share space with the other programs. This created a very difficult learning environment.

16. RSHT also failed to give me an appropriate externship. For my externship, I spent six weeks at a nursing agency called Heaven Sent. Instead of gaining broad experience in home health care, I spent most of my time waiting around or engaging in activities that required no specialized medical training. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.
17. Another problem with my externship was that Heaven Sent is located in Colonial Heights, Virginia, which is about a forty-five-minute drive from my home. Completing the externship also required additional driving to the homes of Heaven Sent’s clients. The school had not told me that the externship would be so far away and did not reimburse students for gas or mileage. The distance and additional expense of the externship was a big hardship for me.

18. I have tried very hard to get a job as a home health care professional since graduating from RSHT, but I have been unsuccessful.

19. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT’s career services office has given me very little help in finding a job. I left numerous messages for the career services office and never received a call back. When I asked for help with my resume, I was told that an RSHT administrator would get back to me, but she never did. When I was finally able speak to someone in the career services office, she told me that because I was no longer in RSHT’s system, they couldn’t help me.

21. Instead of working in community home health, I clean pools part-time to make ends meet.

22. I was able to secure a forbearance on my student loans for six months, which is about to expire. I do not know how I am going to make the payments, which are over $100 per month.

23. I am white, but the vast majority of students at RSHT were African American. I think RSHT intentionally focuses its marketing and recruiting at African-American and/or lower-income people.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a
mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July [X], 2011

BY:

Bilee Starr Avington
EXHIBIT

2
DECLARATION OF VINETTA BANKS

I, Vinnetta Banks, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from June 2009 until February 2011. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Surgical Technology program at the Richmond campus. I completed the program and will graduate in October 2011.

3. I left RSHT with about $12,000 in federal student loans that I cannot afford. I also had to pay $40 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. I was interested in enrolling in the Radiologic Technology program, but the admissions officer informed me that this program was not available at the Richmond campus. She convinced me to enroll in the Surgical Technology program instead by telling me a number of things about the program that did not turn out to be true.

5. For example, she told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain the necessary clinical experience I needed to become certified as a surgical technician.

6. She also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

7. She also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. She told me that RSHT's career services office would give me extensive assistance in finding a job.

8. She told me that as a surgical technician, I would earn the same amount of money as a radiologic technologist, which was the job I was originally interested in pursuing at RSHT.

9. She also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. I did not want to take out a loan. The school helped me prepare my financial aid paperwork and did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.
11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. A central reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. There was a high rate of turnover because teachers would quit or get fired. Because the school could not replace teachers quickly enough, we went for 10 weeks without a teacher. Sometimes an RSHT administrator would try to lead the class, even though he did not have a background in surgical technology.

13. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, I had to take advanced courses in surgical technology before I completed the basic courses. This created a very difficult learning environment.

14. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn't receive our textbooks for a class until after the class had already started.

15. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Although I was only supposed to spend 5 of my 15 externship weeks learning instrumentation, RSHT did not find an externship site for me and I ended up spending 10 weeks in "central sterile," where my only task was to sterilize and pack instruments.
17. When RHST told me that I would spend my 5 remaining externship weeks in “central sterile” as well, I refused. Instead, I arranged an externship site on my own at Stoney Point Surgery Center. However, I was not able to complete all of the 150 required procedures in just one 5 week externship. As a result, I cannot be certified as a surgical technician.

18. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Even though certification is not technically required to work as a surgical technician, in practice it is what employers want to see in job applicants.

19. I have not taken the certification exam yet because I know that even if I pass the exam, I still do not have the 150 procedures to get certified. Moreover, many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT’s career services office has given me very little help in finding a job.

22. Instead of working as a surgical technician, I work part-time as a laboratory technician. I was able to get this job after taking a 6-week phlebotomy course. My current employment is not at all related to the education I received at RSHT.

23. I am supposed to start paying back my loan this fall, but I cannot afford to pay it back without a full-time job.

24. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a
mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: [Signature]
Vinnetta Banks
EXHIBIT

3
DECLARATION OF MELISSA BLANEY

I, Melissa Blaney, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2008 until 2010. The school is also known as “Richmond School of Health and Technology.”

2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.

3. I left RSHT with over $10,000.00 in federal student loans that I cannot afford. I also had to pay at least $40.00 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to become a certified surgical technician, including the knowledge I would need to pass a certification examination and the necessary clinical experience. RSHT also told me that the cost of the certification examination would be covered, and I would not have to pay for it out of my own pocket.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn $40,000 to $50,000 per year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

10. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. I have not signed up to take the certification exam because I know that I’m not adequately prepared. The
curriculum just did not match up with the certification exam, and I would have to invest considerable time to learn the material necessary for the exam on my own.

12. In addition to feeling that I was not prepared, I also did not have the money to pay for the cost of certification exam. Although RSHT had told me that they would pay for me to take the certification exam, that turned out not to be true.

13. Another big reason that we didn’t learn what we needed to learn at RSHT was that often we didn’t have a teacher. For example, at one point in the program, we did not have a teacher for over a week. We were required to come to class, but did nothing. There was not even a substitute teacher.

14. In my computer class, the teacher did not show up for the final exam. After sitting in the classroom for nearly two hours, an instructor from another program came in and informed us that we would all receive “A”s since the teacher was absent. We never took the exam for that class.

15. Additionally, RSHT did not provide us with the in-depth Anatomy and Physiology course that was promised for students in the Surgical Technology program. I received an “A” for this class even though I never had the chance to take it.

16. Textbooks were also a major problem. RSHT did not have enough textbooks for all of the students and for some classes, we never received textbooks.

17. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us, such as gloves, gowns, and medical instruments. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.
18. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. While I spent part of my externship in an operating room, I completed the remainder of externship at two dentists’ offices which did not count toward the clinical experience I needed for certification. Because RSHT did not arrange a proper externship for me, I did not have the opportunity to complete the required 150 surgical procedures. Therefore, I cannot be certified as a surgical technician.

19. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. I lack experience in the operating room that employers are looking for due to my externship placements at RSHT. I have also been told that RSHT did not have the proper accreditation in the field of surgical technology.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT’s career services office has given me no help in finding a job. When I asked for job placement assistance, I received just one email that contained one job posting and nothing further.

22. Instead of working as a surgical technician, I am unemployed. I have stopped looking for a job in the field because I do not feel as though RSHT provided me with the necessary training to work as a surgical technician.

23. I am supposed to make monthly payments on my student loans, but I cannot afford them. I have been able to defer repayment for six months, but I do not know how I am going to make the payments when the deferment is over.
24. I am white. I think RSHT intentionally targets its marketing and recruiting at low-income and/or African-American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 26, 2011

BY: MELISSA BLANEY
UNIVERSAL DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,
on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF CATHRYN CHAMPACO

1. Cathryn Champaco, hereby state as follows:

   I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

   1. I was a student at RSHT from 2008 until 2009. The school is also known as "Richmond School of Health and Technology."

   2. I was enrolled in the Surgical Technology program at the Chester campus. I left the program after about 10 months.

   3. I left RSHT with over $10,000.00 in federal student loans that I cannot afford. I also had to pay $40.00 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. The school pressured me to enroll in the Surgical Technology program. RSHT also told me a number of other things that did not turn out to be true.

5. For example, I was also told that the Surgical Technology program was the best program at the school.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become a certified surgical technician, including the knowledge I would need to pass a certification examination and the necessary clinical experience.

7. They also told me that near the end of my education at RSHT, the school would arrange externships for me where I would obtain valuable hands-on experience related to my field of study.

8. They also told me that if I attended and graduated from RSHT, I would get a good job as a surgical technician. RSHT told me that the Surgical Technology program was the one in which I would make the most money upon graduating. They told me that I would earn at least $50,000.00 a year. They also told me that RSHT’s career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.
11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. For example, the overall quality of instruction at RSHT was very poor. When we started our classes in Surgical Technology, we did not have an instructor for two weeks. In addition, our classes were supposed to last from 5:00 p.m. until 10:00 p.m. However, I was normally home by 7:00 or 7:30 p.m. Students spent the majority of class time completing crossword puzzles and word searches.

13. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, we didn't have very many medical instruments, and we would have to share these instruments with other students. Additionally, our instructors really did not teach us how to use these instruments.

14. Furthermore, RSHT did not arrange an externship for me as promised. In fact, only two students in my class got externships. RSHT told us that these two individuals got externships because they passed some sort of required test and were qualified while the rest of us were not. However, to my knowledge, such a test was never offered or administered to any of the students in my class, including the two students placed in externships. I was never offered such a test to demonstrate my knowledge before beginning the externship.

15. Additionally, RSHT subjected its students to arbitrarily-enforced rules. For instance, one day the school told us that we were required to wear white tennis shoes even though at the start of the program they told us that the color of our shoes did not matter. The school also told us that coloring our hair was against the school's dress code. RSHT would not let me attend class the following day because I continued to wear a pair of non-white tennis
shoes. RSHT also would not let me attend class because of the blonde highlights in my hair. I could not afford to buy a new pair of white tennis shoes, and did not understand the point of the hair color rule.

16. I became so frustrated with my education at RSHT that I made the decision to quit my program. RSHT told me that if I left the program at that point, I would not have to pay for the second half of the program. However, a few months later, RSHT told me that I had pay over $2,000 because I left the program early.

17. I don't know anyone from RSHT who has found a job in his or her field of study.

18. Instead of working as a surgical technician, I am unemployed.

19. My student loans are currently in deferment because I am unemployed. When my deferment expires and my loans become due, I am not sure how I will make payments. In addition, I am currently paying $50.00 per month to a collections agency to cover the $2,000 that RSHT told me I owed when leaving the program.

20. I am white. The majority of students at RSHT are African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and African-American people.

21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: [Signature]

CATHRYN CHAMPACO
EXHIBIT

5
UNIVERSAL DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF SHARON CHAVIS

I, Sharon Chavis, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until August 2008. The school is known as
"Richmond School of Health and Technology."

2. I was enrolled in the Surgical Technology program at the Richmond campus. I
did not graduate from the program.

3. I left RSHT with over $10,000 in federal student loans that I cannot afford. I also
had to pay $40 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to become a certified surgical technician, including the knowledge I would need to pass a certification examination and the necessary required clinical experience.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and participate in the externship at the same time. RSHT staff assured me that I could do both and told me that the externship would be offered in the evenings.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in the field of surgical technology, and I would earn a high salary. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

9. RSHT led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 9 above.
11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

12. For example, RSHT did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

13. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn’t receive our textbooks for a class until after the class had already started.

14. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. I had to start taking the core Surgical Technology courses before I had completed my general education coursework. This created a very difficult learning environment.

15. RSHT’s promise that I could complete the externship in the evenings also turned out not to be true. In the second week of the program, I heard rumors that the externships were only during the day. I brought my concerns to the RSHT administrators and informed them that I wanted to quit if that was the case, but they assured me that the externships could be done during the evenings. Based on this assurance, I decided to remain in the program. In August 2007, however, our class was informed that the externships were only available during the day. At this point, RSHT told me that I could no longer quit because I was already responsible for 100% of the loans.

16. A month before I was supposed to begin my externship, I learned that RSHT had no externship sites – day or night – available for me, and that I would need to leave the program until RSHT could arrange an externship placement.
17. In an effort to graduate on time, I decided to arrange an externship on my own. I contacted hospitals in Virginia, Maryland, and Washington, DC. Johns Hopkins University Hospital in Baltimore, MD agreed to take me on as an extern. I had to take a leave of absence from my day job and relocate to Maryland in order to do the externship, which put an incredible financial strain on my family.

18. I quickly discovered that I didn’t have the skills that the staff at Johns Hopkins expected to me have. I didn’t have any knowledge of the instruments, needles, or procedures used in the operating room because they were not taught to us at RSHT.

19. Because of the stress of being inadequately prepared for the externship, as well as the financial hardship created by my leave of absence, I no choice but to withdraw from my externship at Johns Hopkins.

20. I returned to RSHT and insisted that the school locate a local facility with evening hours for me to complete my externship. RSHT refused to assist me. As I had no luck arranging an appropriate externship for myself in the Richmond area, I had to leave the program.

21. I also requested that RSHT assist me with job placement. Again, they refused.

22. Instead of working as a surgical technician, I run a child care center.

23. I know very few people from RSHT who have found jobs in their field of study.

24. I am scheduled to pay over $150/month on my student loans, but I cannot afford to pay so much. I was able to defer repayment for a year, but I do not know how I am going to make the payments when the year is over.

25. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.
26. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

By: [Signature]
Sharon Chavis
UNIVERS STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF WHITLEY CLARK

I, Whitley Clark, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from January 2010 until August 2010. The school is also known as “Richmond School of Health and Technology.”

2. I learned about RSHT by seeing ads on TV. The ads said that the school provided job placement services.

3. I was enrolled in the Community Home Health (CHH) program at the Richmond campus.
4. I left RSHT with over $4,000 in federal student loans that I cannot afford. I also had to pay $40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would make me qualified as a home health aide.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to work in my field of study.

9. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. I would be qualified to work in hospitals and nursing homes, or I could do private-duty nursing.

10. The school helped prepare my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.
13. I learned near the end of the CHH program that there was uncertainty about what certification I was working towards. Nobody at RSHT seemed to know what title CHH students were eligible to receive upon completing the program. I did not learn until near the end of the class that there was a certification exam I would have to sit for after I finished my externship. I had not realized I would have to take an exam to become a certified nursing assistant.

14. Another significant problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. Our program didn’t have its own supplies so we would have to go into the surgical technician room to use their materials. We did not have sufficient access to the surgical technician room, however, so we were not able to learn what we were supposed to learn.

15. Another problem with RSHT was inadequate classroom space. Our class was supposed to have its own room, but almost every day we had to move to a different room. Sometimes we would have to go into other parts of the building or into the Annex in the mall.

16. RSHT also failed to give me an appropriate externship. The school placed me at Heaven Sent, a nursing facility in Colonial Heights, Virginia, which is about a half-hour drive outside Richmond, Virginia. I did two weeks at the externship, but then I didn’t have a car anymore and I didn’t have money for gas. The school said there was nothing they could do because they couldn’t find any closer nursing facilities. Because of my transportation difficulties, I was unable to complete the externship, which was required to graduate.

17. After I stopped doing the externship, I first heard about another program requirement that RSHT had never previously mentioned. I learned that after completing my externship I would have an additional 6-week class at a different school called the Professional Career Institute before I could graduate from RSHT.
18. I know very few people from RSHT who have found jobs in their field of study.

19. Instead of working in home health care, I am unemployed.

20. My loans have entered repayment, but I cannot afford to pay them back.

21. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at people who qualify for grants and loans. Most of the students in my program were African-American.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: [Signature]
Whitley Clark
EXHIBIT

7
UNIVERSAL DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN
and
AMANDA SMITH,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JESSICA DAVIS

I, Jessica Davis, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2010. I graduated from RSHT with
honors. The school is also known as “Richmond School of Health and Technology.”

2. I learned about RSHT through advertisements in an African-American owned
newspaper.

3. I was enrolled in the Medical Assistant program at the Richmond campus. I
completed and graduated from the program.
4. I left RSHT with over ten thousand dollars in federal student loans that I cannot afford. I also had to pay $40.00 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would give me everything I needed to work as a medical assistant. They also told me that if I attended and graduated from RSHT, it would be easy for me to get a job as a medical assistant.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. The school filled out a lot my financial aid paperwork for me and told me to sign the forms.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 8 above.

10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. One big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, I almost went through an entire module without having a teacher. Teachers were constantly leaving the program. During these times, a school administrator would come in and, instead of teaching us, would just tell us to read a chapter in a textbook.
12. An additional way in which my education at RSHT was disrupted was that financial aid officers would regularly enter class to get people to sign their loan paperwork.

13. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. Students even wrote letters to RSHT administrators about the shortage of supplies. While the administration acknowledged the problem and promised to get us the necessary supplies, the situation remained largely unchanged.

14. Another problem was that when I did my externship, I didn’t have skills that they expected to me know. I didn’t have these skills because the skills were not taught to us at RSHT. The people who were employed at my externship site did not believe that RSHT students had the necessary training to do work in the field.

15. I have tried to get a job as a Medical Assistant since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

16. I have not taken the certification exam because I do not think being certified will help me much in finding a job as a medical assistant due to RSHT’s poor reputation.

17. I know very few people from RSHT who have found jobs in their field of study.

18. RSHT’s career services office has given me very little help in finding a job. During the period around graduation, the only assistance the school provided was to e-mail me about one job. However, it was a job that I already knew about and for which I had already applied. The only other contact I’ve had with the school regarding employment is a card asking me if I had yet found a job.
19. Instead of working as a Medical Assistant, I work part-time at a deli.

20. I am supposed to pay over $100/month on my student loans. My loans are now in forbearance because I cannot afford to pay so much. I do not think I will be able to afford these payments when the forbearance expires in a few months.

21. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and African-American people. I believe that marketing RSHT as a school “on the bus line” is an attempt to appeal to minority populations. A lot of people who attended RSHT used public transportation and lived in public housing.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Even though I graduated from the program with honors, just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: JESSICA DAVIS
EXHIBIT

8
UNIVERSAL OF DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

MARY MORGAN and AMANDA SMITH, on behalf of themselves and all others similarly situated, No.: 1:11-cv-01066-GK
Plaintiffs,
v.
RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC., Defendant.

DECLARATION OF ERWIN DAWKINS, SR.

I, Erwin Dawkins, Sr., hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I became a student at RSHT in June 2009 and finished the program in December 2010. The school is also known as “Richmond School of Health and Technology.”

2. I enrolled in the Surgical Technology program at the Richmond campus.

3. I left RSHT with over $12,000 in federal student loans that I cannot afford. I also had to pay $40 out of my own pocket to RSHT every month.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. I was initially interested in the Radiologic Technology
program, but the admissions officer informed me that this program was only available at the Chester campus. I indicated that I would be willing to go to the Chester campus, but the admissions officer advised me to consider the Surgical Technology program instead. They told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that if I attended and graduated from RSHT, I would get a good job as a surgical technician. They told me that students find jobs within one to two months of graduating. They led me to believe that RSHT’s career services office would give me extensive assistance in finding a job, from offering one-on-one counseling to setting up job interviews.

7. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

8. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and participate in the externship. RSHT staff assured me that I could do both and told me that the externship would be offered in the evenings.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.
10. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

12. Another big reason that we didn’t learn what we needed to learn at RSHT was that often we didn’t have a teacher. At times, new teachers would come and go every few days.

13. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. Students from all levels were grouped into the same classes. This created a very difficult learning environment.

14. Textbooks were also a major problem. Books were included in tuition, but I did not receive my textbook until three months into the program. Some of my classmates did not receive their textbooks until even later. The only reason that I received my textbook when I did was because I complained to the administration almost every day about the lack of textbooks.

15. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. Because the school did not provide us with medical instruments, I drew and photocopied pictures of the instruments for the other students in my class.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for
150 procedures. Instead, RSHT sent me to "central sterile," where I only learned to sterilize and pack instruments. I ended up spending all 15 weeks in central sterile even though RSHT administrators continued to promise me an externship in the operating room that would count towards certification. At the time I graduated, I had not completed any of the 150 required procedures.

17. After I graduated and passed the certification exam, I continued to complain to RSHT that I could not get certified because they had not provided the required externships in the operating room. I had to complain to the RSHT administration for almost 6 months before the school finally set up an additional 5-week externship for me in an operating room in May 2011.

18. RSHT’s promise that I could complete the externship in the evenings also turned out not to be true. The externship in the operating room that RSHT finally offered me was during the day at Southside Regional Medical Center in Petersburg, which is about 40 miles away. I have had to take a leave of absence from work in order to be able to participate in the externship. I am not sure if my employer will allow me to return to work once I complete my externship.

19. My externship will end in early August 2011, and it is highly unlikely that I will satisfy the 150 case requirement. I have tried to get additional time in the operating room on my own, but health care facilities won't take me because they say that the school is supposed to set up the externship.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT’s career services office has given me very little help in finding a job. All the career services office does is post job listings on a bulletin board.
22. Instead of working as a surgical technician, I work as a custodian at Virginia Commonwealth University. This is the same job that I had before I attended RSHT.

23. I am supposed to pay about $80 per month on my student loans, but I cannot afford to pay so much. I do not know how I am going to make the payments when they become due in September 2011.

24. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 16, 2011

BY: Erwin Dawkins, Sr.
MARY MORGAN
and
AMANDA SMITH,
on behalf of themselves and all others
similarly situated,

Plaintiffs,
v.
RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

DECLARATION OF RAVONNE DOUGLASS

I, Ravonne Douglass, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until 2009. The school is also known as
   “Richmond School of Health and Technology.”

2. I was enrolled in the Surgical Technology program at the Chester campus. I
   completed and graduated from the program.

3. I left RSHT with federal student loans equal to nearly $20,000. I also had to pay
   approximately $100.00 out of my own pocket to RSHT each month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to become certified as a surgical technician.

6. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in surgical technology and would have an excellent chance of obtaining one. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

7. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

8. RSHT personnel told me that I would receive an Associate’s Degree upon completion of the program and that the Associate’s Degree and credits would transfer to another educational institution.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

10. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

11. For example, RSHT did not prepare me for a certification exam that would help me get a job as a surgical technician. After I enrolled, I discovered that the certification RSHT prepared us for, which is given by the National Center for Competency Testing (“NCCT”), is not recognized by most employers. Employers instead generally recognize a different organization’s
certification for surgical technicians, but RSHT students cannot take the other organization’s certification examination.

12. As a result of this information, I chose not to take the certification exam offered by the NCCT for which RSHT was supposedly preparing me. I do not see the point in taking the exam for a certification that will do little to help me find a job as a surgical technician. I also did not take the test because I did not feel adequately prepared for it after completing RSHT’s curriculum.

13. Another major problem with RSHT was that often we didn’t have a teacher. For example, I did not have a teacher for several weeks at one point in the program. During that time, we did not receive any sort of instruction and were left to study on our own.

14. During this period without a permanent instructor, the school sent part-time instructors to teach us who were not there consistently and would often miss classes.

15. When there was a teacher, some of the instructors did not have experience in surgical technology. For example, one of my teachers had a radiology background and did not have the required knowledge to teach the class. That teacher mostly just sat in front of the classroom and did not try to teach us.

16. Whenever students would go to the administration with concerns—such as not having instructors—an administrator would simply tell the students that RSHT was working to address the problem. However, these problems were never addressed.

17. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, our instructors would give us packs of gloves and tell us to fold the gloves back in the wrapper so
they could be re-used. This took away from the experience of preparing for the operating room since gloves are never re-used in practice. Additionally, we only had one set of instruments, and the set was an incomplete mix of new and old instruments.

18. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

19. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT’s career services office has done nothing to help me find a job as a surgical technician.

21. Instead of working as a surgical technician, I work at Goodwill.

22. Given my poor career prospects with an RSHT degree, I considered pursuing a four-year nursing degree at another school. I thought I would be able to transfer my Associates Degree and its credits to the four year institution, as RSHT had promised. However, I have learned that other schools do not recognize credits from RSHT.

23. I am supposed to make a monthly payment of over $100 on my student loans, but I cannot afford to pay so much since I am only working part-time. Currently, my loans are in forbearance but I do not know how I will pay them when the forbearance period is over. The forbearance period is only six months.

24. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a
mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: RAVONNE DOUGLASS
EXHIBIT

10
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF SUZANNE FERRELL

1. Suzanne Ferrell, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2010. The school is also known as
“Richmond School of Health and Technology.”

2. I learned about RSHT from an African-American friend who was thinking about
attending RSHT.

3. I was enrolled in the Pharmacy Technician program at the Richmond campus. I
completed and graduated from the program.
4. I left RSHT with thousands of dollars in federal student loans that I cannot afford. I also had to pay $40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study and allow me to practice as a pharmacy technician in Virginia.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become licensed in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have a good chance of obtaining one.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. Before I enrolled at RSHT, I informed the school that I had a prior drug conviction and I asked I could still be in the program and find work in the field afterwards. The RSHT employee I met with assured me that I could still work in the field and that my criminal record would not be a problem.
12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. A big reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. For example, one of my teachers left and it took almost a month for RSHT to get a replacement. In the meantime, school administrators would come into the class and give us busywork. The work included crossword puzzles and other assignments that had no relation to pharmacy technology.

15. Another big problem with RSHT was the poor quality of instruction. For example, one of my teachers had very little knowledge or experience. I had to teach myself the material because I wasn't learning in class.

16. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books. My textbooks had many grammatical mistakes and my teacher complained that much of the medical information in my books was years out of date. Pharmaceutical information and drug names change frequently so it was a serious disadvantage for me to be studying materials that were not current.

17. Another significant problem with RSHT was that the school did not have enough equipment and supplies, including pharmacy tools, for our instructors to use to teach us. There was little equipment beyond empty pill bottles. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

18. Another problem with RSHT was that I didn't have most of the skills that the staff at the drugstore expected me to know when I did my externship. I didn't feel prepared for my
externship and my externship supervisor told me that there were things that I didn’t know that I should have learned. I didn’t have these skills because the skills were not taught to us at RSHT.

19. Another problem with RSHT is that many externship placement sites do not want RSHT students because they know that RSHT does such a poor job of educating and training its students. I originally wanted to extern at a hospital, but I learned that the hospital’s pharmacy had stopped accepting RSHT students as externs because the hospital had had bad experiences in the past with RSHT students who were not properly prepared.

20. Towards the end of the program, I learned that I would not be able to get the certification that RSHT had promised. Throughout the program, I had continued to approach RSHT with questions about my certification, and RSHT repeatedly assured me that my past drug conviction would not bar me from becoming certified. RSHT continued to assure me of this up until I graduated. The information RSHT told me was not true and I cannot obtain a license to work as a pharmacy technician in Virginia. My time at RSHT turned out to be worthless because I cannot be licensed to work in the field.

21. I know very few people from RSHT who have found jobs in their field of study.

22. Instead of working as a pharmacy technician, I am unemployed. I intend to return to school soon to study automotive technology a different school.

23. I was supposed to begin paying about $50/month on my student loans last summer but I could not afford to pay so much. The only reason I have not defaulted is that I was able to get temporary forbearance on my loans.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: Suzanne Ferrell
EXHIBIT

11
UNIVERSITY DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF LISA FRANKLIN-STARKE

I, Lisa Franklin-Starke, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I was a student at RSHT from September 2008 until August 2009. The school is
also known as "Richmond School of Health and Technology."

2. I was enrolled in the Surgical Technology program at the Richmond campus.

3. I left RSHT with about several thousands of dollars in federal student loans that I
cannot afford. I also had to pay $140 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified as a surgical technician. This was supposed to include the knowledge I would need to pass the certification exam.

7. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that over 50% of students get a job offer from their externship site. They told me that the starting salary for a surgical technician is about $40,000 a year. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that the classes and externships I would need to take were offered in the evenings.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.
11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

12. The classes at RSHT were difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. On several occasions I had to take a more advanced course before I had taken the introductory course. This created a very difficult learning environment.

13. Another major problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies, including medical instruments used by surgical technicians.

14. Getting a proper externship was a crucial part of what my education at RSHT was supposed to provide because certification as a surgical technician requires participation in 150 surgical procedures. I spent 5 weeks of my externship in “central sterile,” sterilizing and packing instruments, but this experience did not assist me in obtaining the 150 procedures needed for certification. RSHT did not have any externships in the operating room available after I finished at central sterile, so I left the program, hoping that I would return when appropriate externships became available. I called RSHT regularly to check whether they had found an operating room externship site for me. After 5 months, I gave up. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified.

15. RSHT’s promise that the externship would not conflict with my day job also turned out not to be true. I had to take time off from work in order to be able to participate in the externship, which RSHT later told me was only available during the day.
16. I have looked for jobs as a surgical technician, but I have been discouraged from applying because I don’t have any hands-on experience. Moreover, many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

17. I know very few people from RSHT who have found jobs in their field of study.

18. RSHT’s career services office has given me very little help in finding a job.

19. Instead of working as a surgical technician, I work as a legal assistant for an attorney.

20. I am supposed to pay more than $100 per month on my student loans from RSHT, but I cannot afford to pay so much. I was able to defer repayment for a year, but I do not know how I am going to make the payments when the year is over.

21. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: Lisa Franklin-Strake
EXHIBIT

12
UNIVERSAL STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN
and
AMANDA SMITH,
on behalf of themselves and all others
similarly situated,
Plaintiffs,
v.
RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,
Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JOYCE FREEMAN

I, Joyce Freeman, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a current student at RSHT. The school is also known as “Richmond School of Health and Technology.” I enrolled in the school in 2009. I have completed my coursework, and am currently waiting to complete the final portion of my program’s externship component.

2. I learned about RSHT from a friend who is African-American.

3. I am enrolled in the Surgical Technology program at the Richmond campus.

4. I will leave RSHT with about $20,000.00 in federal student loans that I cannot afford. I also had to pay $40.00 out of my own pocket to RSHT every month.
5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that have not turned out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. Additionally, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to surgical technology.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the necessary externship experience and the knowledge I would need to pass the certification exam.

9. Furthermore, they told me that if I attended and graduated from RSHT, I would get a good job as a surgical technician. They told me that I would earn around $30,000 to $35,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

10. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.
13. One reason that we didn’t learn what we needed to learn at RSHT was that the school fired two of our teachers during the course of the program, even though one of the teachers was a particularly good instructor. The change in teachers created a disruptive learning environment.

14. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, the lab often did not have gloves or surgical gowns.

15. Getting a proper externship was a crucial part of what my education at RSHT was supposed to provide because certification as a surgical technician requires being on a surgical team for 150 procedures. Instead, I spent ten weeks of my externship in “central sterile,” where I only sterilized and packed instruments. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified. I have been waiting for about a year for RSHT to find me a five-week final externship assignment so I can graduate. Even if I get a good externship and graduate, however, I will not have the 150 procedures needed for certification because five weeks is not enough time to get that many procedures.

16. Many of my classmates chose to complete all of their externships in central sterile so that they could simply fulfill the graduation requirement. However, the time they spent in central sterile does not apply toward the 150 procedures needed for certification.

17. Because RSHT advised me to wait until I completed my externship to take my certification exam, I have delayed taking my exam for nearly a year. As a result, I do not feel prepared to take my certification exam since it has been so long since I have studied a lot of the material.
18. I know very few people from RSHT who have found jobs in their field of study.

19. Currently, I am working part-time as a Certified Nursing Assistant at a retirement home. I had my CNA license and this job before beginning the Surgical Technology program at RSHT.

20. RSHT knew I had my CNA license when I met with the admissions office and the school encouraged me to enroll in the Surgical Technology program. The school told me that I would be able to earn more money by attending RSHT and getting a surgical technician certification than I could as a CNA.

21. I am supposed to make a monthly payment of over $150 on my student loans, but I cannot afford to pay so much since I am only working part-time. Currently, my loans are in forbearance but I do not know how I will pay them when the forbearance period is over. The forbearance period is only six months.

22. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY

JOYCE FREEMAN
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF LOLITA GRANT

I, Lolita Grant, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I was a student at RSHT from March 2010 until October 2010. The school is also
known as “Richmond School of Health and Technology.”

2. I learned about RSHT from seeing TV advertisements. The ads said that once
you graduated, the school would find you a job at a good pay rate.

3. I was enrolled in the Community Home Health (CHH) program at the Richmond
campus. I completed the coursework for the program, but have not graduated because I have
been unable to complete the externship requirement.
4. I left RSHT with at least $4,000 in federal student loans that I cannot afford. I also had to pay $40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam.

9. RSHT employees also told me that I would receive a diploma for nursing upon completing the program.

10. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. I asked if it was a guarantee that I would find employment and they told me yes. They told me after I graduated, I would earn $16-18/hr and could work anywhere I wanted. They also told me that upon graduation, RSHT’s career services office would place me in a job.

11. The school helped me fill out my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.
12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

14. I learned near the end of the CHH program that there is no such thing as certification in “community home health” in Virginia and that RSHT did not know what certification examination I and the other CHH students would take.

15. I and many other CHH students were very upset with how RSHT handled the CHH program and the certification issue. We complained, but we received no response while I was still attending the program. In early 2011, I got a call from RSHT telling me that I could take a Certified Nursing Assistant (CNA) class at another school. I have not enrolled because RSHT told me I would need to pay a $75 readmission fee to join the class, which I do not have. In addition, unlike the RSHT campus, the CNA class is not accessible via public transportation.

16. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of hands-on skills at RSHT because of the lack of equipment and supplies.

17. RSHT also failed to arrange an externship for me as promised. When I was ready to start an externship, the school only had placements in far-away areas like Hopewell, Petersburg, and Colonial Heights, Virginia. Because I and several of my classmates did not have transportation to get to those places, RSHT told us we would have to sit out until the next externship cycle came around and they would call us when they had a placement available.

18. RSHT called me with an externship placement about half a year later, but the placement immediately fell through because my classmates and I lacked the skills and
experience that RSHT had told the externship site we possessed. RSHT sent us to a nursing facility called Comfort Keepers. However, the woman who was in charge of the facility cancelled our externship when she realized that we did not have any experience in the field. As a result, I was not able to complete the externship requirement.

19. I know very few people from RSHT who have found jobs in their field of study.

20. Instead of working in community home health, I am unemployed. Everywhere I have sought employment, no one recognizes the education that I received in community home health.

21. My loans have entered repayment, but I cannot afford to pay them back.

22. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income people, especially those people “on the bus line.” The majority of students in my program were African-American.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: Lolita Grant
EXHIBIT

14
UNIVERSITY DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF LATRICE GREELY

I, Latrice Greely, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from September 2008 until September 2010. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Surgical Technology program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with more than $20,000 in federal student loans that I cannot afford. I also had to pay $139 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would easily obtain one in a surgical center, outpatient center, or hospital. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.
12. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

13. Another major reason that we didn’t learn what we needed to learn at RSHT was that often we didn’t have a teacher. For example, one of my teachers did not show up for two weeks straight. During that time, the class would sit for an hour waiting for the teacher, sign the attendance roll, and then go home.

14. Another problem with RSHT was the poor quality of instruction. Teachers were often unknowledgeable and inexperienced. For example, one of my teachers was not able to pronounce many of the medical terms he was supposed to be teaching us.

15. RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us, including medical instruments. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Although the externship was supposed to provide us with operating room experience, I agreed to spend my first 5 week externship in “central sterile” sterilizing and packing instruments because RSHT did not have any operating room placements. I also thought it would give me an opportunity to gain familiarity with the medical instruments that are used in the field but that RSHT did not provide.
17. When RSHT told me that I would have to spend my second 5 week externship also in central sterile, I took time off from the program to try to find my own externship. I was not successful in securing my own externship due to RSHT’s poor reputation and the fact that other schools had already established externship programs with the hospitals and surgical centers in the Richmond area.

18. Because I was unable to secure an externship in the operating room, I went back to RSHT and reluctantly agreed to do my second externship in central sterile. During that time I continued to look for an externship myself that would provide the operating room experience I needed for certification.

19. My final 5 week externship was at an oral surgeon’s office, but none of the procedures I assisted with counted toward my required 150 procedures. I was forced to quit my job at UPS to attend the externship because the placement was from 9 a.m. to 5 p.m. four days a week.

20. Because I continued to complain to RSHT about the fact that my externships did not provide me with any of the 150 procedures required for certification, RSHT arranged an additional two-week placement at a plastic surgeon’s office. However, because of the surgeon’s schedule, I only assisted with one surgery over the two-week period that counted towards my 150 procedures.

21. Because RSHT did not arrange a proper externship for me, I only completed one out of the required 150 procedures and cannot be certified. I have tried to get an externship on my own since graduating so that I can get the required experience, but health care facilities won’t take me because I am no longer covered by insurance as a student.
22. Another problem with my externship experience was that I didn’t have most of the skills that the staff at my externships expected to me know. I didn’t have these skills because they were not taught to us at RSHT.

23. I have tried to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful because I do not have enough the experience that employers are looking for. Although I passed the written exam required for certification, I cannot become a certified surgical technician because I do not have the 150 required cases. I lack the right qualifications to find a job in the field because RSHT did not deliver on its promises to me.

24. I know very few people from RSHT who have found jobs in their field of study.

25. RSHT’s career services office has given me very little help in finding a job. The career services office told me to go online and apply for jobs, but offered me no individual help.

26. Instead of working as a surgical technician, I work at Chippenham Hospital in central sterile, a job which does not require any education in surgical technology.

27. I was able to put my student loans in forbearance, but I do not know how I am going to afford payments in the future. My payments are supposed to be about $200/month.

28. I am African-American. The vast majority of my program at RSHT was African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.
29. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

[Signature]

Latrice Greely
DECLARATION OF DELORES HARGROVE

I, Delores Hargrove, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from February 2007 until October 2007. The school is also known as “Richmond School of Health and Technology.”

2. I learned about RSHT from a friend who is African-American and was attending another program at RSHT.

3. I was enrolled in the Medical Billing and Coding program at the Richmond campus. I left the school about halfway through the program.
4. I left RSHT with about $10,000.00 in federal student loans that I cannot afford. I also had to pay $40.00 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would give me everything I needed to enter the medical billing and coding profession, including the knowledge I would need to pass the certification exam in the field.

7. They also told me that as part of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in the field of medical billing and coding, and that I would earn a high salary. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

9. The school completed my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what my financial aid forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 8 above.

11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

12. A major reason that we didn’t learn what we needed to learn at RSHT was the quality of teachers and instruction. The instructors RSHT provided often had no background in
the subjects they taught. For example, our Anatomy and Physiology teacher was an undergraduate student from a nearby college. The instructor did not know anything about human anatomy; in fact, the instructor's undergrad major was not even related to anatomy.

Additionally, our Medical Billing and Coding teacher quit during the program and was replaced by an instructor who was not knowledgeable in the field. Our classes were always rushed and did not provide students adequate time to process the material.

13. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, when I began the program, I started in the middle of the medical terminology course with students who had already been studying the material for a number of weeks. This created a very difficult learning environment.

14. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out-of-date books.

15. When I tried to complain about the quality of the education I was receiving, RSHT administrators would tell me that someone would get back to me. No one ever did. Eventually I was so frustrated with my experience at RSHT that I decided to leave the school about halfway through the program. I did not see the point in continuing with a worthless education.

16. I know very few people from RSHT who have found jobs in their field of study.

17. Instead of working in Medical Billing and Coding, I work at a bakery.

18. RSHT told me that even though I left the school halfway through the program, I was still responsible for the full cost of the program. RSHT also told me that if I left the program, I would not be able to obtain student loans at another school.
19. I am paying over $50.00/month on my student loans. I struggle to pay this amount every month given my current employment.

20. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: Delores Hargrove
DELORES HARGROVE
EXHIBIT

16
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN
and
AMANDA SMITH,
on behalf of themselves and all others
similarly situated,
Plaintiffs,
v.
RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,
Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JASMINE HAWKINS

I, Jasmine Hawkins, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I was a student at RSHT from June 2009 until August 2010. The school is also
known as “Richmond School of Health and Technology.”

2. I was enrolled in the Medical Assistant program at the Richmond campus. I did
not complete the program.

3. I left RSHT with about $5,000 in federal student loans that I cannot afford. I also
had to pay $40.00 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. I felt pressured to sign up for the Medical Assistant program. They also told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. RSHT told me that they would accommodate my schedule when I was placed at an externship. I had a full-time day job and was very concerned about being able to keep my job and participate in the externship. RSHT staff assured me that I could do both and told me that the externship would be offered in the evenings.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become a certified medical assistant. This was supposed to include the knowledge I would need to pass the certification exam.

8. RSHT told me that if I attended and graduated from RSHT, I would get a good job as a medical assistant. RSHT told me that I would probably get hired at my externship. If I did not get hired at my externship, they told me that RSHT's career services office would give me assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.
11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

12. A major reason that we didn't learn what we needed to learn at RSHT was the inconsistency in teaching. At one point we did not have a teacher for one and one-half months. During this time, an RSHT administrator would come and distribute tests or send us home. My class then went through a series of teachers. This constant changing of instructors was extremely disruptive.

13. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. We were constantly skipping around in our textbook in an attempt to accommodate students at different levels. This learning process was very frustrating.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

15. In addition, the school refused to work with me to try and arrange an externship at night that would accommodate my work schedule during the day. RSHT told me that they could not find me an evening externship. As a result, I was forced to arrange an externship myself and had to take time off from RSHT to set it up.

16. After a month or two or searching, I found an externship at medical center. I went back to RSHT so that they could do the paperwork to formalize the placement, but no one at RSHT ever followed up.

17. Again, I was forced to leave the program and wait for an appropriate externship to be arranged. RSHT told me to quit my day job to complete the requirement and graduate. I was
not able to quit my job for the entire 10-week externship, so I had no choice but to drop out of the program.

18. I know very few people from RSHT who have found jobs in their field of study.

19. Instead of working as a medical assistant, I work in a nursing home delivering meals to residents. This job does not require any specialized training and it is not at all related to the education I was supposed to receive at RSHT.

20. I was able to defer repaying my student loans until next March, but I do not know how I am going to make the payments after that.

21. I am multi-racial (white, African-American, Korean, and Native American). The RSHT student body is majority African-American. I think RSHT intentionally targets its marketing and recruiting at low income and/or African American people.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: [Signature]

JASMINE HAWKINS
UNIVERSAL STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  

MARY MORGAN  
and  
AMANDA SMITH,  
on behalf of themselves and all others similarly situated,  
Plaintiffs,  
v.  
RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,  
Defendant.  

No.: 1:11-cv-01066-GK  

DECLARATION OF MARY HITE  

I, Mary Hite, hereby state as follows:  

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.  

1. I was a student at RSHT from 2009 until January 2011. The school is also known as “Richmond School of Health and Technology.”  

2. I was enrolled in the Licensed Practical Nursing (“LPN”) program at the Richmond campus. I completed and graduated from the program.  

3. I left RSHT with over $20,000.00 in federal student loans that I cannot afford. I also had to pay money out of my own pocket to RSHT every month. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain
to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified and licensed by Virginia as an LPN. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience. This also included paying for our first state board exam.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT’s career services office would provide job placement upon graduation.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. I still do not fully understand the terms of my loans. Each time I have subsequently asked RSHT about my financial obligations, I come away even more confused.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.
10. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. I did not pass the exam. I believe that the biggest reason that I did not pass is that RSHT did not teach us what we needed to know to pass the exam. The curriculum just did not match up with the certification exam.

12. I retook the exam and passed. The only reason I was able to pass the second time was that I studied a lot of material that was not part of our curriculum at RSHT.

13. RSHT did not pay for either of the certification exams that I took.

14. Another significant reason that we didn't learn what we needed to learn at RSHT was that often we didn't have a teacher. In one of my classes that met four times a week, the teacher only came one day a week. For the other day, RSHT told me to sign an attendance sheet and leave.

15. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. Our labs did not have the materials we needed to learn.

16. The quality of instruction was also very poor. Our teachers frequently refused to cover certain concepts. They said that we should learn that material in another class, or that we should have learned it in a prior class.
17. RSHT also failed to give me an appropriate externship. Instead of learning firsthand how to be a practical nurse, I spent most of my time standing around. My externship was not a valuable experience and was not at all like what RSHT told me it would be like. I think that the externship sites felt that RSHT students were not prepared to work with patients, and therefore did not want to put their patients at risk.

18. I have tried very hard to get a job as a nurse since graduating from RSHT, but I have been unsuccessful. I believe that many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. I am currently unemployed.

19. RSHT’s career services office has given me very little help in finding a job. The career services called me last month to offer assistance after this lawsuit was filed. I had not had any contact with the school since February.

20. I was so frustrated by my experience at RSHT that I called the Better Business Bureau to complain.

21. I was supposed to start repaying my loans by making a monthly payment, but I cannot afford to do so. I was able to defer repayment for a few months, but I do not know how I am going to make the payments when the deferment period is.

22. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income people like myself.
23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: 

MARY HITE
EXHIBIT

18
UNIVERSAL STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN
and
AMANDA SMITH,
on behalf of themselves and all others similarly situated,
Plaintiffs,
v.
RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,
Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF MARCUS HOLLOWAY

I, Marcus Holloway, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a current student at RSHT. I began classes in February 2011 and am scheduled to graduate in October 2011. The school is also known as “Richmond School of Health and Technology.”

2. I am enrolled in the Massage Therapy program at the Richmond campus.

3. I will leave RSHT with several thousands of dollars in federal student loans that I cannot afford. I also have had to pay $40 out of my own pocket to RSHT every month.
4. I met with an RSHT admissions officer before I enrolled at RSHT and started classes. I was interested in enrolling in the Radiologic Technology program, but the admissions officer pressured me to enroll in the Massage Therapy program instead. I told the admissions officer that I needed some time to think it over, and left the RSHT office. The admissions officer then called me every few days, about 5 or 6 times in total, and I eventually made an appointment to learn more about the Massage Therapy program.

5. When I returned to RSHT, I met with admissions and financial aid employees. They told me a number of things about the Massage Therapy program that did not turn out to be true.

6. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become licensed by Virginia in my field of study. This was supposed to include the knowledge I would need to pass the state licensing exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. They also led me to believe that the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. I did
not know I had taken out a loan, and only found out when I received a letter from Direct Loans in the mail after I had enrolled.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 9 above.

11. The education I have received from RSHT has not even come close to living up to RSHT’s promises or my expectations.

12. One significant problem with RSHT is that the school does not have enough supplies for our instructors to use to teach us. We waited for months before finally getting supplies we needed, such as towels, lotions, oils, and clean linens. These supplies were not provided by RSHT in any adequate amounts before this lawsuit was filed. We lost valuable class time because of the lack of equipment and supplies.

13. I have not begun the externship portion of the program yet, but I am worried that I will not actually get hands-on experience in the field. Some students have had to complete their externships within the school because RSHT does not allow all of the students in the Massage Therapy program to do their externships off-site.

14. I have not yet received any assistance from the career services office to find a job after graduation. I don’t know of any students who have received job placement help from RSHT.

15. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

16. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a
mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: Marcus Holloway
UNIVERSITY STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF ELISHA JONES

I, Elisha Jones, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2011. The school is also known as “Richmond School of Health and Technology.”

2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.

3. I left RSHT with well over $10,000.00 in federal student loans that I cannot afford.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn between $17.00 to $18.00/hour as a starting wage. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

8. RSHT also led me to believe that most of the cost of attending would be covered by grants, not loans, so that I would not have to repay most of the money. RSHT staff filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. RSHT also told me that that credits I earned while at RSHT would transfer to other institutions and could be applied towards a Registered Nursing ("RN") degree.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.
12. For example, RSHT has not prepared me for the certification exam. I have not taken the certification exam yet, but I have reviewed exam preparation materials and found that many of the questions are not related to areas we studied in my classes.

13. I have also learned that the certification exam that RSHT arranges for us to take, which is given by the National Center for Competency Testing ("NCCT"), is not recognized by most employers. Employers instead generally recognize a different organization's certification for surgical technicians, but RSHT students cannot take the other organization's certification examination.

14. Another problem with RSHT is that our teachers changed all the time. This includes teachers changing in the middle of a class. In one class, the replacement teacher spent much of our class time playing computer games and not making any effort to teach the class.

15. Additionally, the quality of instruction was poor. For example, with one of my instructors, class time would often consist of students completing worksheets. There would often be no teaching.

16. Textbooks were also a major problem. RSHT did not provide the students with enough textbooks, leaving people to study from photocopies.

17. Another problem at RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn't learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, our lab did not have an operating room setting; instead, it mostly consisted of a bed. At times, we also did not have basic supplies such as gloves or gowns.
18. Additionally, in one of my externships that lasted five weeks, I did not gain much valuable experience. I spent the whole externship in "central sterile" instead of in the operating room.

19. Furthermore, RSHT's initial salary figures for surgical technicians were much higher than the salaries I have found in the field. Instead of $17.00 or $18.00/hour, most surgical technicians that I know have started at around $12.00/hour.

20. Additionally, I have discovered that my RSHT credits cannot be applied towards the completion of an RN degree at another school.

21. Currently, I am working at Southside Regional Medical Center, the site of one of my externships, but the job is in central sterile and I earn $8 per hour.

22. Even though I have found employment, many of my classmates were not as fortunate. I know very few people from RSHT who have found jobs in their field of study.

23. I do not know how much my monthly student loan payments will be, but I do not expect to be able to afford them. I am supposed to start repaying my loans in a few months.

24. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people like myself.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: [Signature]
ELISHA JONES
DECLARATION OF ERICKA JOYNER

I, Ericka Joyner, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT 2006 from until 2007. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Medical Assistant program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with several thousand dollars of federal student loans that I cannot afford. After the first month and a half in the program, I also had to pay $40.00 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study upon graduation. An admissions officer told me that I would earn at least $13.00/hour and that RSHT’s career services office would give me extensive assistance in finding a job. Additionally, they said that RSHT had relationships with clinics that would provide jobs to RSHT students.

7. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

8. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

9. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

10. For example, RSHT did not prepare me for the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.
11. Another reason that we didn't learn what we needed to learn at RSHT was that we went through several teachers during the course of a month before we received a permanent teacher.

12. RSHT also failed to give me an appropriate externship. I did my externship at Primary Health Group in Richmond. Instead of learning firsthand how to be a Medical Assistant and to perform tasks like suturing and giving shots, I spent most of my time filing records and taking blood pressures. My externship was not a valuable experience and was not at all the hands-on experience RSHT told me it would be.

13. I have tried very hard to get a job as a Medical Assistant since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. Employers would tell me that RSHT students were unprofessional. This bad reputation, combined with my lack of experience in the field, has prevented me from getting a job despite having passed the certification exam.

14. I know very few people from RSHT who have found jobs in their field of study.

15. The year after graduation, I contacted RSHT for assistance in finding a job. An RSHT administrator told me that the school would get me a placement with a specific company. However, I never heard anything else about this placement. I called trying to follow up, but those calls were never returned.

16. I briefly did some temp work as a medical assistant, making $8.00/hour. However, I could never secure a full-time position. Since I could not find work, I let my certification expire.
17. I am supposed to pay over $100.00/month on my student loans, but I cannot afford to pay so much. Even though I received an initial forbearance, I have since had to default on my loans.

18. I am African-American. The students in class were predominantly African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and African-American people like myself. I also believe that RSHT’s emphasis on the school’s location “on the bus line” in its advertising is an attempt to appeal to African-American students.

19. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: Ericka Joyner

ERICKA JOYNER
EXHIBIT

21
DECLARATION OF DAWN KIDD

I, Dawn Kidd, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until 2009. The school is also known as “Richmond School of Health and Technology.”

2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.

3. I left RSHT with over $15,000 in federal student loans that I cannot afford. I also had to pay a substantial amount of money out of my own pocket to RSHT most months. These payments generally ranged from around $100 to around $200 per month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that if I attended and graduated from RSHT, I would earn between $55,000 and $75,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job and that most students were hired as permanent employees at their externship sites.

7. The school did not clearly explain to me what financial obligations I would have to incur to attend RSHT, particularly regarding the amount I would have to repay each month after graduating.

8. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

9. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

10. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. The curriculum just did not match up with the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us.
11. Another significant reason that we didn’t learn what we needed to learn at RSHT was that our instructor often changed in the middle of a class. Many of our instructors did not know enough about the subjects they were teaching us to be effective.

12. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

13. Additionally, I didn’t have most of the skills that the staff at my externship expected to me know. I didn’t have these skills because the skills were not taught to us at RSHT.

14. Even though I have found employment in the field, I now know that the jobs only pay approximately $12 to $13 per hour to start.

15. I know very few people from RSHT who have found jobs in their field of study. Many work in industries such as fast food, and not in Surgical Technology.

16. RSHT’s career services office provided me with very little help in finding a job. All the career services office did was review my resume.

17. While I have found employment in the field, I only found work through my own efforts.

18. I am supposed to pay over $150/month on my student loans, but it is very difficult to pay so much. I had to defer my loans for two months earlier this year because of the high monthly payments.

19. I am African-American. The vast majority of students in my program were also African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.
20. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: [Signature]
DAWN KIDD
EXHIBIT

22
UNIVERSITY STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF KIMBERLY LITTLE

I, Kimberly Little, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I attended RSHT from November 2009 to June 2011. The school is also known as “Richmond School of Health and Technology.”

2. I was enrolled in the Surgical Technology program at the Chester campus. I completed and graduated from the program.

3. I left RSHT with over $10,000 dollars in federal student loans that I cannot afford. I also had to pay $40 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to become a certified surgical technician, including the knowledge I needed to pass a certification examination and the required clinical experience.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

7. When I met with RSHT employees before I decided to attend, I had a full-time job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that they would work with my schedule.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn at least $20.00/hour. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

11. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.
12. For example, RSHT did not prepare me for the certification exam. I have not
signed up to take the certification exam because I know that I’m not adequately prepared. All of
my classmates that I know took the exam did not pass. I believe that the biggest reason that they
did not pass is that RSHT did not teach us what we needed to know to pass the exam. The
curriculum just did not match up with the certification exam.

13. Textbooks have also been a major problem. For example, the school refused to
provide the existing students copies of the new textbooks that the incoming students and teachers
were using. Therefore, the new students and existing students were using different textbooks in
the same class. The existing students had to use textbooks that were outdated and missing
chapters found in the new edition.

14. Another big problem with RSHT was that the school has not provided us the
supplies we were promised. For example, the school had said it would provide separate scrubs
for our externship. They did not and I was forced to pay for them on my own.

15. RSHT’s promise that they would accommodate my work schedule when it was
time for my externship turned out not to be true. Although I worked from 3 p.m. to 9 p.m. as a
security guard and asked for a day-time externship, the only externship RSHT offered me was
from 3 p.m. to 11 p.m. RSHT told me that I would have to sit out for the externship period if I
did not accept this placement. As a result, I coordinated a leave of absence from my job.
However, when it came time to go out for the externship, RSHT changed the schedule. RSHT
told me that my externship would be pushed back to a later date and that I would instead take
another class before beginning the externship. I tried to contact my job and ask for my hours
back, but it was too late; they had already given my shift to another person. Even now I have
been unable to get back my regular shift as a security guard.
16. I was lucky to receive an externship placement in the operating room at an area hospital. Many of the students in my program were not able to get similar placements and were either forced to leave the program or to go to sites where they would not obtain experience in the operating room. Even though I obtained the 150 surgical procedures required for certification, I am not certified because RSHT did not adequately prepare me to take and pass the certification exam.

17. I have been unable to find a job in the field. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. Even if I could get a job as a surgical technician, I now know that full-time jobs only pay approximately $14-$15 per hour.

18. Instead of working as a surgical technician, I am unemployed.

19. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT's career services office has done nothing at all to help me find a job.

21. My loans have not yet entered repayment, but I am not sure how I am going to make payments when they become due.

22. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.
23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

[Signature]
KIMBERLY LITTLE
EXHIBIT

23
DECLARATION OF KATHLEEN MARTIN

I, Kathleen Martin, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from October 2006 until April 2008. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Medical Billing and Coding program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with over $15,000.00 in federal student loans that I cannot afford. I also had to pay approximately $300 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable practical experience related to medical billing and coding.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified. This was supposed to include the knowledge I would need to pass the certification exam.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in medical billing and coding. They told me that I would earn approximately $40,000 a year. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

12. For example, for half of the program, I did not have a teacher. An administrator would periodically check on the class, but we were not given any assignments and had to work
on our own. On several occasions, when there was no teacher available, we were told to sit in on the Medical Assistant classes instead, even though the material covered in these classes was not relevant to billing and coding.

13. Textbooks were also a major problem. Books were included in tuition, but the school gave us out of date books. It took approximately 10 weeks for RSHT to order new books.

14. RSHT did not prepare me for the certification exam. I did not pass the exam the first time I took it because RSHT did not provide adequate instruction or textbooks.

15. When I retook the certification exam a second time, I passed. The only reason I was able to pass was that I studied very hard on my own and ordered my own study guides and textbooks. I do not think I would have passed if I had only studied the material that RSHT gave me.

16. RSHT also failed to give me an appropriate externship. I did my entire externship on campus. Instead of learning firsthand the duties of a billing and coding specialist, I spent 5 weeks in the computer lab or working out of a workbook. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

17. I have tried very hard to get a job as a billing and coding specialist since graduating from RSHT, but I have been unsuccessful. Although I have had several interviews, employers do not want to hire me because I don’t have any relevant experience. Having the externship experience that RSHT promised me would have significantly increased my chances of obtaining a job in the field.

18. I know very few people from RSHT who have found jobs in their field of study.

19. RSHT’s career services office has given me very little help in finding a job in my field of study. RSHT told me to contact an employer who had hired Medical Billing and Coding
students in the past. But when I went to work there, I found out that it was call center for Medicare and Medicaid and not related to the field of medical billing and coding or what I had studied at RSHT.

20. Instead of working as a billing and coding specialist, I am currently unemployed.

21. My loans have entered repayment, but I am not able to make the monthly payments, which are nearly $200/month.

22. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: Kathleen Martin

Kathleen Martin
EXHIBIT

24
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,

on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF IBI MBOTO

I, Ibi Mboto, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2008 until 2010. The school is also known as “Richmond School of Health and Technology.”

2. I learned about RSHT from television commercials, including advertisements on BET (Black Entertainment Television).

3. I was enrolled in the Surgical Technology program at the Richmond campus. I left the program before completing it.
4. I left RSHT with several thousands of dollars in federal student loans that I cannot afford. I also had to pay over $60.00 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would give me everything I needed to become a certified surgical technician, including the knowledge I would need to pass a certification examination in my field of study as well as the necessary clinical experience.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

8. They also told me that if I attended and graduated from RSHT, I would get a good job as a surgical technician in a hospital. RSHT told me that after graduating, I would make between $22-$28/hour. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

9. The school helped me to prepare my financial aid forms and asked me to sign them. I felt rushed to complete the financial aid process, and the school did not clearly explain to me what financial obligations I would have to incur to attend RSHT.

10. RSHT staff assured me that the program was fully accredited. As a result, when I signed up I believed that the academic credits I earned at RSHT would transfer to other educational institutions.
11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

13. RSHT created a very difficult learning environment for its students. For example, we did not have consistent teachers. When we were without an instructor, staff from the registrar or bursar’s office, who had no background in Surgical Technology, would fill in. At times, teachers would leave mid-module and we would have multiple teachers in one 5-week module. Some teachers were unknowledgeable and inexperienced. This inconsistency in teaching made it very difficult to master the material that we should have been learning in class.

14. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us, including medical instruments. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, we didn’t have the supplies to learn how to scrub, which is the most essential component to creating a sterile atmosphere in the operating room.

15. In addition, RSHT did not arrange an externship for me as promised. Getting a proper externship was a crucial part of what my education at RSHT was supposed to provide because certification as a surgical technician requires being on a surgical team for 150 procedures. However, when it came time for me to my externship, RSHT told me that there were no externship placements available. RSHT staff told me that I would have to leave the program until they were able to find an externship site for me.

16. As a result, I was forced to try to arrange one on my own. However, I found that local hospitals did not want to accept me as an extern once they found out I attended RSHT even
though they had student externs from other area schools. I believe that these hospitals were not accepting RSHT students because of the poor reputation of RSHT.

17. Frustrated that RSHT was not providing the externship that they had promised, I had no choice but to leave the program. I decided to enroll at another area college, but during the process of enrolling, I discovered that my credits earned at RSHT would not transfer.

18. I know very few people from my program at RSHT who have found jobs in their field of study.

19. I have been able to defer paying my student loans back for the present time, but I do not know how much those payments will be when they become due. In addition, RSHT claims that I owe them over $4,000 because I left in the middle of the program, and has filed suit against me in state court.

20. I am African-American. The majority of students at RSHT are African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: [Signature]

[Signature]
EXHIBIT

25
DECLARATION OF HERBERT A. MEADE

I, Herbert A. Meade, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until early in 2011. The school is also known as “Richmond School of Health and Technology.”

2. I was enrolled in the Surgical Technology program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with thousands of dollars in federal student loans. I also had to make payments out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. I met with RSHT employees specifically to find about entering a Registered Nurse ("RN") program. RSHT told me that it did not have a RN program, but that I should enroll in the school's Surgical Technology program. The admissions person I met with told me that after finishing the Surgical Technology program, I would be able to transfer my credits to another school such as Virginia Commonwealth University or Virginian Union University and apply them toward a RN degree. She also told me that if I worked at a hospital as a surgical technician, I could become a RN through on-the-job training.

6. She also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study. She said that RSHT had relationships with plenty of externship sites so that it would not have difficulty placing me in a good externship.

7. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job as a surgical technician and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. In one instance, an RSHT employee actually forged my initials on a financial aid form. I discovered the forgery when a second RSHT employee asked me to re-sign a document.
After I asked questions about my initials, the second employee admitted that the other employee had committed forgery. The second employee showed me the forged document and shredded it in front of me.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

12. A significant reason that we didn’t learn what we needed to learn at RSHT was that we spent a great deal of time in several classes without a teacher. For example, I did not have an instructor for my pharmacology class. We mostly just sat in pharmacology class without an instructor.

13. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books and sometimes we didn’t receive our textbooks for a class until well after the class had already started. Sometimes our instructor had a different edition of a textbook than we had.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, one of our instructors had to make surgical caps into masks in order to conserve materials. Additionally, our mock operating room had very few instruments that it should have had.

15. RSHT also failed to give me an appropriate externship. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.
16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Instead, I spent most of my externship in "central sterile," where I only sterilized and packed instruments.

17. I expressed concern to RSHT about getting my 150 cases for the purposes of certification, and refused to return to central sterile. In response, RSHT told me to come to school since there were no externship sites. RSHT made spend the rest of my externship, approximately five weeks, sitting in the computer lab.

18. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified.

19. For example, RSHT did not prepare me for the certification exam. When I took the exam, I found that many of the questions were not related to areas we studied in my classes. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us.

20. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Despite the fact that I have applied to jobs all over the country, I cannot even get an interview. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

21. I know very few people from RSHT who have found jobs in their field of study.

22. RSHT’s career services office has given me very little help in finding a job.

23. Instead of working as a surgical technician, I work as a tractor-trailer driver.
24. I also have subsequently discovered that my Surgical Technology credits from will not transfer to another institution and that I cannot apply them toward a RN degree.

25. I am black. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or black people.

26. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a lot of debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: HERBERT A. MEADE
EXHIBIT

26
DECLARATION OF JANA MIRTCHEVA

I, Jana Mirtcheva, hereby state as follows:

1. I was a student at RSHT from 2007 until 2010. The school is also known as "Richmond School of Health and Technology."

2. I initially enrolled in the Licensed Practical Nursing (LPN) program at the Richmond campus. In the middle of the LPN program, I switched to the Medical Assistant program. I completed and graduated from the Medical Assistant program.

3. I left RSHT with approximately $14,000 in federal student loans that I cannot afford. I also had to pay $40.00 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled in the LPN program at RSHT. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to become licensed in my field of study, including the knowledge I would need to pass the state licensing examination, as well as the required clinical experience.

6. They also told me that RSHT would arrange clinicals for me where I would obtain valuable hands-on experience related to my field of study.

7. RSHT staff also told me that the school had excellent teachers.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

9. The school helped me prepare my financial aid forms and asked me to sign them. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. When I met with RSHT employees before I decided to attend, I had a full-time job from 3 p.m. to 11 p.m. and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could both attend classes and keep working.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.
13. For instance, the clinicals that RSHT assigned me to did not allow me to continue working at my full-time job as they had promised. I kept arriving at my full-time job late because I was not allowed to leave clinicals early, and eventually I was fired. Losing my job caused a great deal of stress and financial hardship for me, and I was unemployed for about a year.

14. Moreover, the instruction was not adequate for students to learn the required material. One of my classes consisted solely of reading several chapters together during class time and then taking a pop quiz on the material. We were left to study on our own to learn the material. When I tried to ask my instructor for help on content I did not understand, she was not available to answer my questions. As a result of the poor instruction, I was unable to pass the exam at the end of the class. I re-took the class, but had the same teacher and the same difficulty learning the material. When I took the exam for the second time, again I was not able to pass it.

15. The course I failed was a required course for the LPN program and RSHT told me I could only take it twice. As a result, when I did not pass the second time, I was forced to leave the program.

16. Frustrated with my experience but still wanting to get an education in the health professions, I switched to the Medical Assistant program in the hopes that it would provide me with better training. Before I enrolled in the Medical Assistant program, an RSHT employee told me a number of things that did not turn out to be true.

17. For example, she told me that attending and graduating from RSHT would give me everything I needed to become a certified medical assistant, including the knowledge I would need to pass the certification examination.
18. She also told me that RSHT would arrange an externship for me where I would obtain valuable hands-on experience related to becoming a medical assistant.

19. She also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. She told me that RSHT’s career services office would give me extensive assistance in finding a job.

20. The school helped me prepare my financial aid forms and asked me to sign them. RSHT did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

21. In making my final decision to enroll in the Medical Assistant program, I relied on the promises that the school made to me like the promises described in paragraphs 17 to 19 above.

22. However, the Medical Assistant program had numerous problems as well. For example, the Medical Assistant program at RSHT did not prepare me for the certification exam. I did not take the exam because I do not think I would have passed if I had only studied the material that RSHT taught us. Almost everyone I know who took the certification exam failed it. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

23. Another major reason that we didn’t learn what we needed to learn at RSHT was that we didn’t always have a teacher. One of our teachers was suddenly fired in the middle of a module. That teacher’s replacement would often fail to show up to class. There was also a period of time during which we had no teacher assigned to our class at all. During this time, an RSHT administrator who was not experienced in my field would simply give us assignments and
then come in the next day and go over the answers to these assignments. There was no
instruction at this time and we were left to study on our own.

24. Textbooks were also a major problem. For example, even though books were
included in our tuition, we didn’t receive our textbooks for our business class until a few weeks
after the class had ended.

25. Another problem with RSHT was that the school did not have enough medical
equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic
clinical skills at RSHT because of the lack of equipment and supplies. For example, we lacked
basic supplies such as needles and blood pressure cuffs. We also did not have a refill pack for a
mechanical arm that was supposed to simulate the experience of drawing blood.

26. When I and other students complained about the quality of instruction and the
lack of equipment and supplies, RSHT never addressed our concerns.

27. RSHT did a poor job in arranging my externship. At first, the school sent me to
an externship that wanted me to have completed several training classes before beginning my
externship. As a result, I was not able to complete this externship because I was not adequately
prepared by RSHT and did not have time to complete these courses before the externship was to
begin. I told RSHT that the site was not appropriate and asked that they find me a new
placement. While they did find me a new site, I did not receive the details about where I would
go until two days before I was to start there.

28. I have tried to get a job as a medical assistant after graduating from RSHT, but I
have been unsuccessful. I believe employers do not want to hire RSHT graduates because the
school does such a poor job of educating and training its students.

29. Instead of working as a medical assistant, I work at a hair salon.
30. I know very few people from RSHT who have found jobs in their field of study.

31. After I graduated in 2010, RSHT’s career services office offered me very little help in finding a job. All the career services office did was email me job listings that I could find myself online.

32. Since this lawsuit was filed, the school has contacted me numerous times offering career services assistance. I have not followed up because I do not believe RSHT can help me find a job in the field.

33. I am supposed to pay over $100 per month for my student loans, but I cannot afford to pay so much. My loans are currently in forbearance. I do not know how I will make the payments once the forbearance period expires.

34. I am white. The majority of students at RSHT are African-American.

35. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: Jana Mirtcheva

JANA MIRTCHEVA
EXHIBIT

27
DECLARATION OF PATRICIA MITCHELL

I, Patricia Mitchell, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2010, when I completed my coursework. I formally graduated from RSHT in 2011. The school is also known as “Richmond School of Health and Technology.”

2. I was initially enrolled in the Surgical Technology program at the Richmond campus. I then transferred to the Surgical Technology program at Chester. I completed and graduated from the program at Chester.
3. I left RSHT with about $20,000 in federal student loans that I could not afford. I also had to pay around $140.00 out of my own pocket to RSHT every five weeks.

4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would give me everything I needed to work as a certified surgical technician, including the knowledge I would need to pass the certification exam and the necessary clinical experience. RSHT told me that the cost of my certification exam would be covered by financial aid.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to my field of study.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT’s career services office would offer job placement.

8. They also told me that the school was fully accredited, and any credits I earned would transfer to other educational institutions.

9. RSHT told me that after I graduated, I would have no problem paying back the loans I had taken out. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.
11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

12. For example, RSHT did not prepare me for the certification exam. I have not signed up to take the certification exam because I know that I’m not adequately prepared. The content of the curriculum just did not match up with the questions on the exam, and I would have to invest considerable time to learn the material necessary to pass the exam on my own.

13. In addition to feeling that I was not prepared, I also did not have the money to pay for the cost of certification exam. Although RSHT had told me that they would pay for me to take the exam, I found out that was not true around the time that I was completing the program.

14. Another big reason that we didn’t learn what we needed to learn at RSHT was that often we didn’t have a teacher. At times, an RSHT administrator would come in and read to us out of the textbook and then dismiss us early. Other times, we would just sit in class without instruction, or simply leave early.

15. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, RSHT placed new students into classes that were already in progress. This meant that within my class, we had students who were just beginning and students who were way ahead. This created a very difficult learning environment.

16. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books.

17. Another big problem with RSHT was that the school did not have enough medical equipment and supplies, including medical instruments. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.
18. I was lucky to receive an externship placement in the operating room at an area hospital. Many of the students in my program were not able to get similar placements and had to go to sites where they would not obtain experience in the operating room. Even though I obtained the 150 surgical procedures required for certification, I am not certified because RSHT did not adequately prepare me to take and pass the certification exam. Even if I was prepared, I could not afford to pay for the exam myself.

19. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

20. I know only one person from RSHT who has found a job in her field of study.

21. RSHT’s career services office has not given me any help in finding a job. They have never even reviewed my resume.

22. Instead of working as a surgical technician, I am about to begin a job as a certified nursing assistant (CNA). I earned my CNA license years before I attended RSHT. The position is not at all related to what I studied at RSHT.

23. I was able to defer payment on my student loans, but I do not know how I am going to make the payments when the deferral period is over.

24. I am African-American. The majority of RSHT students are African-American. I think the RSHT intentionally targets its marketing and recruiting at lower-income and African-American people like myself.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a
mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 24, 2011

BY: Patricia Mitchell

PATRICIA MITCHELL
EXHIBIT

28
DECLARATION OF QAMARAH NASIR

I, Qamarah Nasir, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2004 until 2005. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Medical Assistant program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with over $4,000.00 in federal student loans that I cannot afford.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to becoming a medical assistant.

7. RSHT told me that if I attended and graduated from RSHT, I would get a good job with a good salary. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

8. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

10. The education I received from RSHT did not even come close to living up to the school’s promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. This is because my classes at RSHT taught only the most basic information. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class.
12. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, when we were learning how to draw blood, we practiced on straws and oranges because RSHT did not have the appropriate equipment for us to practice on.

13. I also experienced problems with my externships because I didn’t have most of the skills that the staff at my externship sites expected to me know. I didn’t have these skills because the skills were not taught to us at RSHT.

14. For example, I did not feel confident at my externships because of the poor training I received at RSHT. My first externship was at a doctor’s office. The doctor expected me to assist during a pap smear, but I had no idea what to do and I gave the doctor the incorrect instrument during the procedure. At my second externship, I was asked to draw a patient’s blood but did not know how to do it properly.

15. After graduating, the only job RSHT helped me to find was not as a medical assistant, but rather as a residential counselor for adults with mental disabilities. This job didn’t require any specialized medical training.

16. Instead of working as a medical assistant, I now work part-time during the academic year in a school cafeteria.

17. When my medical assistant certification expired soon after I graduated, I had no choice but to allow it to expire because keeping the certification valid was costly and I could not find a job. I have never had a job as a medical assistant, and even though RSHT led me to believe the program offered a valuable certification. Many employers do not want to hire RSHT
graduates because they know that RSHT does such a poor job of educating and training its
students. Moreover, many employers do not recognize the certification I earned through RSHT.

18. I know very few people from RSHT who have found jobs in their field of study.

19. My student loans are currently in forbearance due to economic hardship. I am not
sure how I will make the payments when the forbearance runs out.

20. I am African-American. I think RSHT intentionally targets its marketing and
recruiting at lower-income and African-American people like myself.

21. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and
ripped off by the school. Just about the only thing I have to show for my time at RSHT is a
mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth
about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

[Signature]

QAMARAH NASIR
DECLARATION OF LATISHA NEAL

I, Latisha Neal, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2010. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Medical Billing and Coding program at the Chester campus. I completed and graduated from the program.

3. I left RSHT over $5,000.00 in federal student loans that I cannot afford. I also had to pay $40.00 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study. I was also told the certification exam fee would be covered by the cost of tuition.

6. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

7. The school filled out a lot of my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. Every time I had a question about financial aid, the person I spoke with said that a supervisor needed to be consulted. I did not even understand the extent to which I had taken out loans—as opposed to receiving financial aid—until after I had signed my enrollment agreement.

8. RSHT also told me that while the Medical Billing and Coding program was not an associates’ degree program at that time, the school was currently in the process of converting it into an associates’ degree program. They told me that it would switch to the associate’s degree program and graduate with that degree.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 9 above.

10. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.
11. For example, RSHT did not prepare me for the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the material that RSHT taught us.

12. Additionally, when the time came for me to take the certification exam, the school told me that I had to borrow additional money from the federal government to pay for the test.

13. Another big reason that we didn't learn what we needed to learn at RSHT was teacher attendance. For example, one of our teachers would sometimes simply not show up to class. Additionally, this instructor went on a two-week vacation and left us with a substitute. The substitute teacher would come in and, instead of teaching us, would just tell us to read a chapter in a textbook or tell us to sign an attendance sheet and leave.

14. Additionally, at one point in the program, we simply did not have a teacher.

15. The classes at RSHT were also difficult places to learn because students would start in the middle of an instruction period and then would experience new students joining the same class. Therefore, people in the same class were often at different points in the curriculum. This created a very difficult learning environment.

16. Textbooks were also a major problem for many students. While I had new textbooks, people who were already in the class had older books. People with new books had to share with people who had older books. Additionally, the instructors would often be using a different textbook than the students.

17. Another problem with RSHT was that the school did not have enough functioning computers for everyone in my class to use. In our computer lab, about half of the computers did not work.
18. We also found out halfway through the program that Medical Billing and Coding at RSHT would remain a certificate program and was not going to be changed to an associates' degree program. This was very upsetting to myself and many other students.

19. I have tried very hard to get a job as a medical billing and coding professional since graduating from RSHT, but I have been unsuccessful. I believe that many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

20. I have also learned that the certification exam that RSHT arranges for us to take, which is given by the National Center for Competency Testing, is not recognized by most employers. Employers instead generally recognize a different organization's certification for medical assistants, but RSHT students cannot take the other organization's certification examination.

21. I know very few people from RSHT who have found jobs in their field of study.

22. RSHT’s career services office has given me very little help in finding a job. Any job leads that the school posted on its jobs board were simply pulled from the internet. Whenever I would speak with the career services person, she was not very helpful. For example, I sent her my resume for her to review, and she never followed up with me.

23. Around graduation, I requested a meeting with career services, but the career services person was not at school. I met with another person at RSHT who simply had me fill out a form so that the school could keep in touch with me with job postings. There has not been any follow up.

24. Instead of working as a medical billing and coding professional, I am unemployed. Despite having applied for many jobs, I have not been able to find work. I became
frustrated and allowed my medical assistant certification to expire instead of paying more money to renew it. I do not feel doing the recertification now is worthwhile because I cannot find a job.

25. I am supposed to pay over $50.00/month on my student loans, but I cannot afford to pay so much. I was able to defer repayment twice, but I do not know how I am going to make the payments when the deferment is scheduled to end in September 2011.


27. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: Latisha Neal

LATISHA NEAL
EXHIBIT

30
DECLARATION OF IRENE SHOKUNBI

I, Irene Shokunbi, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I have been a student at RSHT since March 2010. The school is also known as “Richmond School of Health and Technology.”

2. I am enrolled in the Community Home Health (CHH) program at the Richmond campus.

3. I left RSHT with over ten thousand dollars in federal student loans that I cannot afford. I also had to pay around $89 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn at least $12 an hour, and that I would earn more than a certified nursing assistant. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.

11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.
12. I learned near the end of the CHH program that there is no such thing as certification in "community home health" in Virginia and that RSHT did not know what certification examination I and the other CHH students would take. The school decided that we should take the Patient Care Technician (PCT) certification exam. I decided not to take that exam because working as a PCT was a much lower level of certification than I had been promised.

13. I, and many other CHH students, were very upset with how RSHT handled the CHH program and the certification issue. We complained, and the school arranged for us to take a six-week Certified Nurse Aide (CNA) Training Program at another school, the Professional Career Institute. I do not plan to enroll in this program when I graduate from RSHT. RSHT promised me a certification higher than a CNA, and I paid more than $10,000 to become a community home health care professional. The program at PCI costs RSHT less than $1,000 and provides a lower level of certification than I was promised.

14. Textbooks were also a major problem. Books were included in tuition, but the school often gave us out of date books.

15. In addition, the externship did not turn out the way I expected. The school tried to set me up with an externship in Colonial Heights, but that was too far for me to travel with my day job. Although externships were required to graduate, I was forced to try to arrange an externship on my own. I sought an externship placement at various sites and explained that I was a student in home health care, but no one recognized the program or had ever heard of this degree.
16. Almost six months after I finished classes, a classmate informed me that the school had a new externship site in Richmond. I called RSHT immediately to sign up, and had to pay a $75 readmission fee.

17. I started my externship at Comfort Keepers in May 2011. Instead of gaining firsthand experience in home health care, I spent most of my time doing tasks that did not require any medical training and were not related to my field of study. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

18. I know very few people from RSHT who have found jobs in their field of study.

19. I do not believe I will be able to work as a home health care professional when I graduate from RSHT because I have not had the appropriate experience and externship. Instead, I will have to continue working as a security officer, the job I had before I began the CHH program.

20. I am supposed to pay over $100 per month on my student loans, but I cannot afford to pay so much. I was able to defer repayment for a year, but I do not know how I am going to make the payments when the year is over.

21. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.
22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 14, 2011

BY: [Signature]

Irene Shokunbi
EXHIBIT

31
DETHLETES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN
and
AMANDA SMITH,
on behalf of themselves and all others
similarly situated,
Plaintiffs,
v.
RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,
Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF JENNIFER SNOTHERLY

I, Jennifer Snotherly, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I was a student at RSHT from March 2010 until April 2011. The school is also
known as “Richmond School of Health and Technology.”

2. I learned about RSHT from seeing ads on TV. The ads said RSHT had career
counseling and good job placement. I also looked at the school’s website which said the same
thing.

3. I was enrolled in the Medical Assistant program at the Chester campus.
4. I left RSHT with thousands of dollars in federal student loans that I cannot afford. I also had to pay $40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to the medical assistant profession.

7. They also told me that attending and graduating from RSHT would give me everything I needed to work as a medical assistant.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. I came into RSHT’s admissions office interested in joining the Licensed Practical Nursing (LPN) program, but staff in the office talked me out of it, telling me that I could do more as a Medical Assistant. They told me that a Medical Assistant was “higher” than an LPN, made more money than an LPN, and would offer me greater job opportunities. They told me that I would have no problem finding a job, and that RSHT’s career services office would give me extensive job placement assistance, including career development classes and resume-writing help.

9. The school filled out my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 9 above.
11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

12. For example, the classes at RSHT were difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, new students moved into classes that were already in progress so that half the people would be finishing as new students were starting. This created a very difficult learning environment and often the teacher could not keep track of what material different people in the class had covered.

13. The classes at RSHT were also difficult places to learn because the curriculum was disorganized. For example, I took advanced classes in my field of study before completing basic education classes.

14. Textbooks were also a problem. Books were included in tuition, but some students had out of date books. That made instruction difficult because the information in their books would contradict the information in mine. Sometimes we didn’t receive our textbooks for a class until after the class had already started and we would have to borrow books from each other or rush to make photocopies. In addition, there were one or two textbooks that I never received at all.

15. Another major problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. Another problem with RSHT was the poor quality of instruction. Many of my teachers were inexperienced and unknowledgeable. They gave assignments straight from the book without explaining concepts or answering questions.
17. RSHT also failed to give me an appropriate externship. I started doing my externship at Riverside Regional Jail. Instead of learning firsthand how to be a medical assistant and to perform tasks like drawing blood or administering medication, I spent most of my time waiting around or running errands for the jail’s staff. I later began another externship at a doctor’s office. Instead of interacting with patients or taking their vital signs, I spent most of my time answering phones. Neither externship was a valuable experience. Neither was at all like what RSHT told me to expect.

18. Another problem with my first externships was that I didn’t have most of the skills that the staff at the jail expected me to know. The jail needed me to have hands-on experience with tasks like drawing blood. I didn’t have that experience because it was not taught to me at RSHT.

19. Another problem with RSHT is that the administrators were unresponsive. One administrator told me that I could not return to my second externship until I scheduled an in-person meeting with another administrator. The school never followed up with me about this meeting or returned repeated phone calls and messages I left at RSHT. As a result, I was forced to leave the program without completing the externship requirement.

20. I don’t know any classmates from RSHT who have found jobs in their field of study.

21. Instead of working as a medical assistant, I am unemployed.

22. My loans have not yet entered repayment, but I do not know how I am going to make the payments when they begin.
23. I am white. The vast majority of students in my program were African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 11, 2011

BY:

Jennifer Snotherly
EXHIBIT

32
DECLARATION OF SHANELLE THOMAS

I, Shanelle Thomas, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until 2009. The school is also known as “Richmond School of Health and Technology.”

2. I learned about RSHT in a newspaper advertisement.

3. I was enrolled in the Surgical Technology program at the Richmond campus. I completed and graduated from the program.
4. I left RSHT with more than $10,000 of dollars in federal student loans that I cannot afford. I also had to make monthly payments of over $50 out of my own pocket to RSHT. When I was late in making this payment once, RSHT did not allow me to attend classes.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and led me to believe that I would not have any difficulty obtaining one. They provided me with handouts that discussed salaries for surgical technicians. They led me to believe that after graduating from RSHT, I would earn over $35,000 as a surgical technician.

7. They told me that RSHT’s career services office would provide extensive job placement assistance.

8. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

9. The school filled out my Free Application for Federal Student Aid (FAFSA) for me and told me to sign the forms.

10. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that I could complete my externship in the evening.
11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

13. For example, RSHT did not prepare me for the certification exam. I have not yet taken the certification exam but I did take a practice exam. I do not think I could pass the exam by studying only the material that RSHT taught us because the exam includes many subjects that were not covered in our classes at RSHT.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies. For example, we could not do lab work because our lab was not adequately set up and we could not practice unpacking gowns and gloves and keeping them sterile as often as we needed to because the school made us reuse gowns and gloves.

15. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Because RSHT did not arrange for externships in a way that would allow me to complete all 150 procedures, I could not reach the required number of procedures. Therefore, I cannot be certified.

16. After completing a number of procedures at my first externship, I spent my next two externships in “central sterile,” where I only sterilized and packed instruments. The time spent in central sterile does not count toward the 150 procedures. Even though I completed more
procedures at a subsequent externship, I could not reach the required number of procedures while working there.

17. Despite the school’s promise to me, RSHT assigned me to daytime externships. I tried to keep my job and complete the externships, but I lost my job because of the time I had to spend at the externship. Completion of the assigned externships is a requirement for graduation at RSHT. I would not have lost my job if RSHT had kept its promise that I could complete the program in the evenings.

18. Another problem with my externships was that I didn’t have most of the skills that staff at my externships expected to me know. I didn’t have these skills because the skills were not taught to us at RSHT.

19. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students.

20. I know very few people from RSHT who have found jobs in their field of study.

21. RSHT’s career services office has given me very little help in finding a job. RSHT never set up any interviews for me or made any real effort to place me in a job.

22. Instead of working as a surgical technician, I have enrolled at another school to get my bachelor’s degree. Since my credits did not transfer, I feel as though I have a degree from RSHT that is basically worthless.

23. I am African-American. Most of the students in my program were African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.
24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: Shanelle Thomas

SHANELLE THOMAS
DECLARATION OF ANDRE TYLER

I, Andre Tyler, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from January 2009 until December 2010. The school is also known as “Richmond School of Health and Technology.”

2. I was enrolled in the Surgical Technician program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with over $10,000 in federal student loans that I cannot afford. I also had to pay $40 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange a 15-week externship for me where I would obtain valuable clinical experience related to my field of study, including a 10-week externship in an operating room.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified as a surgical technician. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

7. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that I would earn at least $40,000 a year. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

8. Before enrolling in the program, I told RSHT that I had a misdemeanor conviction from four years earlier. I asked if that would be a problem for me as a student or when it came time to apply for jobs in the field. RSHT assured me that it would not be a problem.

9. The school completed my financial aid paperwork and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

11. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.
12. For example, RSHT did not prepare me for the certification exam. I failed the exam the first time I took it because the material on the exam did not match up to the material we learned in class. I took the exam a second time and passed it, but only because I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed the second time if I had only studied the material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

13. A major reason that we didn’t learn what we needed to learn at RSHT was that often we didn’t have a teacher. One time we didn’t have an instructor for two weeks. During that time, RSHT administrators would come in and give us assignments from the syllabus to complete on our own. There was a lot of turnover in teachers which made it hard for students who were struggling to learn the required material.

14. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, RSHT placed new students into classes that were already in progress. This meant that within my class, we had students who were just beginning and students who were way ahead. This created a very difficult learning environment.

15. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us, including medical instruments, gowns, and gloves. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for
150 procedures. Instead, RSHT sent me to “central sterile,” where I only learned to sterilize and pack instruments. I ended up spending all 15 weeks in central sterile even though RSHT administrators continued to promise me an externship in the operating room that would count towards certification. At the time I graduated, I had not completed any of the 150 required procedures. As a result, even though I have passed the written exam, I am not eligible for certification because I did not have the opportunity to complete the necessary surgical experiences during my externship.

17. I was upset with how RSHT handled my externship placement. When I complained to school administrators about the problem, they responded by telling me that I could not get an externship placement at a hospital because I had a misdemeanor. I was upset at this news because I had talked to RSHT about this very issue before I enrolled, and they assured me that it was not a problem.

18. I started applying for jobs as surgical technician even before I graduated from the program. I have tried very hard to find employment as a surgical technician since graduating and passing the certification exam, but I have been unsuccessful. I applied for over 50 jobs in the field, without receiving any offers. Employers have told me that the problem with my application is that I am not certified. Even though certification is not technically required to work as a surgical technician, in practice it is what employers want to see in job applicants.

19. RSHT’s career services office has not helped me in finding a job. All the career services office did was send me one email with two job postings that I had already found myself online. When I visited the career services office in person for more assistance, RSHT staff told me that they would follow up with me. No one ever did.
20. Instead of working as a surgical technician I work at Greater Richmond ARC, a local nonprofit organization, as a custodian.

21. My loans have entered repayment, but I cannot afford to pay them back.

22. I am African-American. The majority of students in my program were African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: Andre Tyler

Andre Tyler
EXHIBIT

34
UNIVERSAL UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF SHEENA TYLER

I, Sheena Tyler, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I was a student at RSHT from September 2007 until the beginning of 2010. The
   school is also known as “Richmond School of Health and Technology.”

2. I was enrolled in the Surgical Technology program at the Richmond campus.

3. I left RSHT with thousands of dollars in federal student loans that I cannot afford.
   I also had to pay $40 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to work in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job in my field of study and would have an excellent chance of obtaining one. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. When I met with RSHT employees before I decided to attend, I had a full-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that the classes I would need to take were offered in the evenings.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.
12. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

13. Classes at RSHT were difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, RSHT placed new students into classes that were already in progress. This meant that within my class, students would be studying different parts of the same chapter depending on when they entered the program. This created a very difficult learning environment.

14. In addition, other resources at RSHT were also lacking. Computers in the computer lab were broken and usually there were no printers that students could use. The school library did not have many books.

15. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us, including medical instruments. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

16. RSHT also failed to give me an appropriate externship. I did a ten week externship at Henrico Doctors’ Hospital. Instead of learning firsthand how to be a surgical technician by observing surgery and assisting doctors in the operating or emergency room, I spent all of my time cleaning instruments. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

17. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. Instead I spent ten weeks of my internship in “central sterile,” where I only sterilized and packed instruments. I can graduate from RSHT by completing another five weeks
of externship, but I still will not have the 150 procedures required for certification because the school did not arrange a proper externship for me for the first ten weeks.

18. RSHT’s promise that I could complete the program in the evenings also turned out not to be true. The only externship placement available to me in the evenings was central sterile, but central sterile does not provide the hands-on operating room experience required for certification. Employers generally want surgical technicians to be certified, especially if they do not have substantial operating room experience.

19. I know very few people from RSHT who have found jobs in their field of study.

20. Instead of working as a surgical technician, I work for Virginia Premier Health Plan as a data entry clerk.

21. I am supposed to pay over $100/month on my student loans, but I cannot afford to pay so much. I was able to place my loans in forbearance, but recently learned that I no longer qualify for forbearance. I do not know how I am going to make the payments.

22. I am African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and/or African-American people.

23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: ________________________________
Sheena Tyler
EXHIBIT

35
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND
TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF L'TANYA WALKER

I, L’Tanya Walker, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I was a student at RSHT from May 2007 until March 2009. The school is also
known as “Richmond School of Health and Technology.”

2. I learned about RSHT by looking online for X-Ray Technician programs. RSHT
listed Radiologic Technology on their website as a program that they offered. I called RSHT and
inquired specifically about the X-Ray Technician program. I made an appointment to meet with
RSHT staff in person but when I went in they told me they weren’t offering the X-Ray
Technician program at that time.
3. A RSHT employee from the admissions office suggested that I enroll in the Surgical Technology program at the Chester campus. I completed and graduated from the program.

4. I left RSHT with more than $10,000 in direct federal student loans that I cannot afford. I also left with several thousands of dollars in loans from Sallie Mae that I cannot afford.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. For example, they told me that attending and graduating from RSHT would prepare me to pass a examination in my field of study that I would take at the end of the program. I later learned that this was the certification examination.

7. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that attending and graduating from RSHT would give me everything I needed to work in my field of study. This was supposed to include the knowledge I would need to pass the exam and the necessary clinical experience.

9. They also guaranteed that if I attended and graduated from RSHT, I would get a good job in my field of study and would earn at least $17 per hour. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

10. They also told me that most of the cost of attending RSHT would be covered by loans that I would not have to begin repaying until after I finished the program.
11. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

12. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

13. The education I received from RSHT did not even come close to living up to RSHT's promises or my expectations.

14. For example, RSHT did not prepare me for the certification exam. I have not tried to take the exam in large part because I do not feel well-prepared after completing the program at RSHT. I do not believe that RSHT taught us what we needed to know to pass the exam.

15. One of the reasons we didn't learn what we needed to learn at RSHT was that often we would get a different teacher for each "module." A module is only five weeks long. This was very disruptive.

16. Getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for 150 procedures. A significant part of my externship was in a doctor's office, however, where I did not get any surgical experience.

17. Another problem with my externship was that when I did get into the operating room, I did not feel comfortable because I didn't have enough preparation. RSHT should have given us more preparation before I was in the operating room on my externship.

18. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. I work at a hospital now in "central sterile." This position
involves cleaning and sterilizing instruments but does not require any education in surgical technology. I applied for an Assistant Surgical Technician job at the same hospital and was told that I was not qualified.

19. I know very few people from RSHT who have found jobs in their field of study.

20. RSHT’s career services office has given me no help in finding a job. All the career services office did is tell me to type up my resume.

21. I started out in my job in central sterile earning $10/hour and am now up to $12/hour. This job will not help me find a surgical technician job because it provides no opportunity to gain experience in the operating room.

22. About half a year into my classes at RSHT, I discovered that I was supposed to start making payments on my Sallie Mae loan, even though RSHT had told me that I would not have to start repaying my loans until after I graduated. I went to talk to RSHT administrators about this and they told me that the way they had filled out my financial aid forms, I would have to start paying the loan back before I graduated.

23. I am supposed to pay over $150 per month on my federal student loans and over $100 per month on my Sallie Mae loans, but I cannot afford to pay so much. My direct loans are currently in forbearance, but I do not know how I am going to make the payments when the forbearance period ends. Even with the federal loans in forbearance, it is extremely difficult to make the payments on the Sallie Mae loans.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: ____________________________

L’Tanya Walker
EXHIBIT

36
DECLARATION OF SANDRA WHITE

I, Sandra White, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2009 until 2011. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Surgical Technology program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with about $20,000 in federal student loans that I cannot afford. I also paid between $50 and $60 each month to RSHT out of my own pocket.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience in the operating room. They said that out of the 15 week externship, I would complete 10 weeks in an operating room.

7. They also told me that if I attended and graduated from RSHT, I was guaranteed a good job as a surgical technician. They told me that I would earn approximately $19 to $20 per hour. They told me that RSHT’s career services office would find me employment when I graduated.

8. The school prepared my financial aid forms and asked me to sign them. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

10. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

11. For example, RSHT did not prepare me for the certification exam. The only reason I passed the exam was that I studied very hard on my own. I had to study a lot of material that we never learned in class. I do not think I would have passed if I had only studied the
material that RSHT taught us. I believe that the biggest reason that many other students did not pass is that RSHT did not teach us what we needed to know to pass the exam.

12. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. For example, the school constantly rotated new students into my classes who were at different points in the curriculum. As a result, we would often have to jump ahead or slow down to accommodate the new students’ schedules. Additionally, these newer students were working out of different textbooks. This created a very difficult learning environment.

13. Another problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies, including medical instruments. The instruments RSHT did have were often broken. We also did not have basic supplies such as gowns or hats. The supply shortage was so severe that one of my instructors asked for donations from her work so that we could have basic equipment, such as gloves.

14. RSHT also failed to give me an appropriate externship. I did my externship at Henrico Doctors’ Hospital (Forest Campus). My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

15. Getting a proper externship was a crucial part of what my education at RSHT was supposed to provide because certification as a surgical technician requires being on a surgical team for 150 procedures. Instead I spent all of my externship in “central sterile,” where I only sterilized and packed instruments. Because RSHT did not arrange a proper externship for me, I did not get my 150 procedures and cannot be certified.
16. I have tried very hard to get a job as a surgical technician since graduating from RSHT, but I have been unsuccessful. Many employers do not want to hire RSHT graduates because they know that RSHT does such a poor job of educating and training its students. I also lack experience in the operating room that employers look for because RSHT did not provide me any externships in the operating room.

17. I don't know anyone from RSHT who has found a job in his or her field of study.

18. RSHT's career services office has given me very little help in finding a job. All the career services office did was provide a board with job postings that I found myself on the internet.

19. Instead of working as a surgical technician, I am unemployed.

20. I am currently within the six-month grace period for my student loans, but will have to start repaying them next month. I have no idea how I will make the payments, which are over $200/month.

21. I am African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people like myself.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 14, 2011

BY: [Signature]
SANDRA WHITE
EXHIBIT

37
DECLARATION OF JOLISA WILLIAMS

I, Jolisa Williams, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT between 2006 and 2007. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Medical Assistant program at the Chester campus.

3. I left RSHT with over $10,000 in federal student loans that I cannot afford. I also had to pay $40 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in my field of study.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

7. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

8. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that I would earn about $36,000 a year. They told me that RSHT's career services office would give me extensive assistance in finding a job.

9. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. When I met with RSHT employees before I decided to attend, I had a part-time day job and was very concerned about being able to keep my job and attend school at the same time. RSHT staff assured me that I could do both and told me that the externship I would need to complete would be offered in the evenings.
11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 10 above.

12. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

13. For example, we didn’t learn what we needed to learn at RSHT because of the lack of quality and consistency in the instruction. It seemed that every couple months, we had a new teacher. Sometimes we didn’t have a teacher at all. Even when we did have a teacher, the teacher would often end the class as much as two hours before it was scheduled to end.

14. The classes at RSHT were also difficult places to learn because RSHT routinely assigned students to classes out of the proper sequence. If the school had not yet lined up an instructor for the next class in our sequence, we had to skip ahead to a more advanced class, and then return later to the introductory class. This created a very difficult learning environment.

15. Textbooks were also a major problem. Books were included in tuition, but sometimes we didn’t receive our textbooks for a class until weeks after the class had already started.

16. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We were always reusing old supplies. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

17. In addition, RSHT did not arrange an appropriate externship for me as promised. The externship the school arranged for me was during the day, even though I had a day job. Instead, I had to arrange an externship on my own, even though it was required to graduate, and I was not able to find one on my own in the evenings. In order to participate in the daytime
externship that I was able to find on my own, I had to cut my hours at work approximately in half and switch to the night shift. I could not afford to finish the externship because of the huge financial strain on my family. I tried several times to go back and finish the externship, but RSHT told me that I could not, and that my only option was to start all over with the basic courses.

18. Because RSHT did not find me an externship in the evenings, I was not able to complete the Medical Assistant program. I had to leave the program because of the financial hardship even though I had completed almost all of the graduation requirements.

19. I know very few people from RSHT who have found jobs in their field of study.

20. Instead of working as a medical assistant, I work at Sam’s Club.

21. I was originally supposed to pay over $200 per month on my student loans, but I could not afford to pay so much. I had to default on my loans. I am now required to pay $116 per month, which is very hard for me to do.


23. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 18, 2011

BY: Jolisa Williams
EXHIBIT

38
UNIVERSITY DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN

and

AMANDA SMITH,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,

Defendant.

No.: 1:11-cv-01066-GK

DECLARATION OF REGINA WILLIAMS

I, Regina Williams, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2007 until 2008. The school is also known as
“Richmond School of Health and Technology.”

2. I was enrolled in the Surgical Technology program at the Chester campus. I
completed and graduated from the program.

3. I left RSHT with about $16,000.00 in federal student loans that I cannot afford. I
also was required to pay an additional amount out of my own pocket.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable clinical experience related to my field of study.

6. They also told me that attending and graduating from RSHT would give me everything I needed to become certified in my field of study. This was supposed to include the knowledge I would need to pass the certification exam and the necessary clinical experience.

7. They also told me that if I attended and graduated from RSHT, I would get a good job in my field of study. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

8. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT. The school simply told me that these forms had something to do with the federal government.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 7 above.

10. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

11. One big reason that we didn’t learn what we needed to learn at RSHT was that often we didn’t have a teacher. For example, one of my instructors left in the middle of a module.
12. When we did have instructors, they were not always trained as surgical technicians. For example, one teacher was actually a radiology instructor and not trained as a surgical technician. She did not have the knowledge to teach our class effectively. Two other instructors were retired Registered Nurses and also did not have training as surgical technicians. Those two instructors would just sit in the classroom while other students and I worked out of our books.

13. Whenever students in my program raised concerns about not having instructors, the administration never responded to these students or concerns.

14. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

15. For example, the lab did not have the correct instruments that we needed to learn. Instead, we were forced to work with what the school had on hand. We also had to look at books for pictures of medical instruments because the school did not actually have the instruments we needed.

16. RSHT also said they would install a “scrub up” sink in the lab, which would allow students to practice scrubbing themselves, as they would before surgery. When I graduated from RSHT, there was still no scrub up sink.

17. RSHT’s library did not have the necessary resources to help us write papers for our classes.

18. Furthermore, getting a proper externship was a crucial part of what my education at RSHT was supposed to be because certification as a surgical technician requires being on a surgical team for at least 150 procedures. I arranged for my own externship at my current
employer because I had already been employed there as an Operating Room Aide. The only reason I currently have a job as an Operating Room Technician at the place I completed my externship is because of my own efforts. RSHT did not provide me with any job placement assistance.

19. Many of my classmates were not as fortunate. During my time as a student at RSHT, I observed the school sending out students to externships before they had completed the classroom component of the curriculum. This did not make sense, since there were numerous students who had already completed the classroom component of the program without externship placement. The process of externship placement was extremely disorganized.

20. RSHT also told me that the first test for certification in my field of study was included in the tuition, and that it did not matter when I took the exam. However, when I decided to take the exam after completing the program, the school told me it was no longer willing to pay for it. The cost of exam registration exceeds $100.00, and I cannot afford to pay for it. As a result, I have not yet taken the certification exam.

21. While I believe I could take the certification exam and pass, it is only because of my experience working in the field. RSHT did not prepare me for the certification exam. Some of the material tested on the exam is not related to what we studied in my classes. I do not think I would be able to pass if I relied only on the material that RSHT taught us.

22. My loans are currently in forbearance. I am supposed to pay over $100 per month, but I cannot afford to pay so much. I am not sure how I will pay the loans back when the forbearance period ends.

23. I know very few people from RSHT who have found jobs in their field of study.
24. I am African-American. The majority of my classmates at RHST were African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

25. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Since I taught myself most of the material, just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I feel as though I could have gone to nursing school for less money than I paid to enroll in RSHT's Surgical Technology program. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 19, 2011

BY: Regina Williams
EXHIBIT

39
DECLARATION OF TIANNA WILLIAMS

I, Tianna Williams, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from spring 2009 until spring 2011. The school is also known as “Richmond School of Health and Technology.”

2. I learned about RSHT through ads on TV and on R&B and hip-hop radio stations like 92.1 and 106.5.

3. I was enrolled in the Licensed Practical Nursing (LPN) program at the Richmond campus.
4. I left RSHT with thousands of dollars in federal student loans that I cannot afford. I also had to pay at least $40 out of my own pocket to RSHT every month.

5. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

6. They told me that attending and graduating from RSHT would give me everything I needed to become licensed as a LPN.

7. They also told me that the school would arrange externships for me where I would obtain valuable clinical experience related to my field of study.

8. They also told me that if I attended and graduated from RSHT, I would be eligible for a good job and would have an excellent chance of obtaining one as an LPN. They told me that I would earn $30,000-40,000 a year. They told me that RSHT’s career services office would give me extensive assistance in finding a job.

9. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

10. They also told me that the school offered free tutoring. The school knew when it told me this that I was going to attend evening classes, but did not say anything about tutoring only being available during the day.

11. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 6 to 11 above.

12. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.
13. For example, one big reason that we didn’t learn what we needed to learn at RSHT was that often we didn’t have a teacher. For example, I had to sit out of the program for several months because the school did not have a teacher for the anatomy class I needed to take. Making me sit out for so long was very disruptive for my education.

14. Another reason my classes at RSHT did not facilitate student learning was that RSHT routinely assigned students to classes out of the proper sequence. For example, even though the concepts in “Anatomy & Physiology II” built on the concepts in “Anatomy & Physiology I,” I was placed in the Anatomy & Physiology II class first. This created a very difficult learning environment.

15. As a result, I sought extra help to compensate for not learning the course material in the proper order. When I asked RSHT for the tutoring promised to me when I signed up, I was told that tutoring would only be available during regular business hours and that I was out of luck because I worked during the day.

16. Textbooks were also a major problem. Books were included in tuition, but often we didn’t receive our textbooks for a class until after the class had already started. The books also contained inaccurate information.

17. Another big problem with RSHT was that the school did not have enough medical equipment and supplies for our instructors to use to teach us. We didn’t learn a lot of basic clinical skills at RSHT because of the lack of equipment and supplies.

18. RSHT also failed to give me appropriate clinical experience. When I arrived at the hospital I was assigned to for my clinical hours, I did not feel that RSHT had adequately prepared me. I did not know how to do many basic procedures that I should have been prepared by RSHT to perform.
19. There was also not enough supervision on my clinical hours, so they would rotate among students and force one student to sit out each week.

20. Because of the poor quality of education I was receiving at RSHT, I withdrew from the school in May 2011.

21. Instead of working as an LPN, I work at a hotel.

22. My loans have not yet entered repayment, but I am not sure how I will pay them when they come due if I am not able to defer repayment.

23. I am African-American. The majority of my classmates at RSHT were African-American. I think RSHT intentionally focuses its marketing and recruiting at lower-income and African-American people.

24. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: Tianna Williams
DECLARATION OF DELORES WOODY

I, Delores Woody, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I was a student at RSHT from 2010 until 2011. The school is also known as "Richmond School of Health and Technology."

2. I was enrolled in the Community Home Health program at the Richmond campus. I completed and graduated from the program.

3. I left RSHT with about $5,000.00 in federal student loans that I cannot afford. I also had to pay $40.00 out of my own pocket to RSHT every month.
4. I met with RSHT employees from the admissions and financial aid offices before I enrolled at RSHT and started classes. They told me a number of things that did not turn out to be true.

5. For example, they told me that attending and graduating from RSHT would prepare me to pass a certification examination in community home health.

6. They also told me that near the end of my education at RSHT, the school would arrange an externship for me where I would obtain valuable hands-on experience related to community home health.

7. They also told me that if I attended and graduated from RSHT, I was guaranteed a job in my field of study. They told me that I would earn enough money to cover the cost of any loans I was taking out, and to not worry about the cost of attending the program. They also told me that RSHT’s career services office would give me extensive assistance in finding a job.

8. They also led me to believe that most of the cost of attending RSHT would be covered by grants, not loans, so that I would not have to repay most of the money. The school filled out my financial aid paperwork for me and told me to sign the forms. The school did not clearly explain to me what the forms meant and what financial obligations I would have to incur to attend RSHT.

9. In making my final decision to enroll at RSHT, I relied on the promises that the school made to me like the promises described in paragraphs 5 to 8 above.

10. The education I received from RSHT did not even come close to living up to RSHT’s promises or my expectations.

11. I learned a few weeks into the CHH program that there is no such thing as certification in “community home health” in Virginia and that RSHT did not know what
certification examination I and the other CHH students would take. Due to student complaints, the school enrolled us in a six-week Certified Nurse Aide Training Program at another school, the Professional Career Institute ("PCI"). It cost RSHT less than $1000 to enroll me in that program, but RSHT did not refund any of the more than $10,000 I had paid for the CHH program.

12. Another problem with RSHT was inadequate classroom space. CHH did not have its own classroom so we would have to share space with the other programs. This created a very difficult learning environment.

13. RSHT also failed to give me an appropriate externship. For my externship, I spent six weeks at a nursing agency called Heaven Sent. Instead of gaining hands-on experience in home health care, I spent most of my time observing the on-staff nurses. My externship was not a valuable experience and was not at all like what RSHT told me it would be like.

14. Another problem with my externship was that Heaven Sent is located in Colonial Heights, Virginia, which is about a forty-five-minute drive from my home. Completing the externship also required additional driving to the homes of Heaven Sent’s clients. I did not have a car at the time so I had to borrow friends’ cars in order to get to the externship site, which caused a great deal of stress. The school had not told me that the externship would be so far away. If I knew the externship would be outside of Richmond I would not have enrolled. The distance and additional expense of the externship was a big hardship for me.

15. I have tried very hard to get a job as a home health care professional since graduating from RSHT, but I have been unsuccessful.

16. I know very few people from RSHT who have found jobs in their field of study.
17. RSHT's career services office has given me no help in finding a job. The only thing the career services office has done is review my resume.

18. Instead of working as a home health care professional, I am unemployed.

19. My student loans have not yet entered repayment. I do not know how I am going to make the payments when the six-month post-graduation grace period is over.

20. I am African-American. The majority of students at RSHT are African-American. I think RSHT intentionally targets its marketing and recruiting at lower-income and/or African-American people.

21. I have suffered great personal anguish as a result of RSHT's broken promises. As a woman in my fifties trying to turn my life around, the fact that I am still on food stamps and cannot pay my bills has caused me great hardship and stress. I have suffered panic attacks because of my inability to find work as RSHT had promised.

22. I wish I had never gone to RSHT. I feel like I was used, taken advantage of, and ripped off by the school. Just about the only thing I have to show for my time at RSHT is a mountain of unaffordable debt. I never would have enrolled at RSHT if I had known the truth about the school.

EXECUTED WITHIN THE UNITED STATES ON: July 20, 2011

BY: DELORES WOODY
EXHIBIT

41
DECLARATION OF TIANA BRANCH

I, Tiana Branch, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee of RSHT, a school that is also known as "Richmond School of Health and Technology." I am African-American.

2. I was an instructor at the Richmond campus in 2005 and 2006. The classes I taught included Anatomy I and II, Medical Terminology, and Pharmacology. I taught students in the Medical Assisting and Licensed Practical Nursing ("LPN") programs.

3. I left RSHT voluntarily to continue my own education. I left RSHT because I was concerned that the school was engaged in fraudulent practices, such as falsifying loan applications and changing grades to keep failing students in school. I did not want to be connected with a place that did things like this.
4. RSHT had many significant problems and I felt that the school did not live up to its promises to give students a good education and enhance their career prospects.

5. One of RSHT's biggest problems was the lack of resources. Working medical equipment is essential for teaching clinical skills and anatomy to students, but there was never enough. For example, we did not have an adequate supply of working blood pressure cuffs or mannequins. There was a small laboratory, but most of the equipment in the lab was broken. Sometimes school officials would tell me that more equipment was on order, but it would never arrive.

6. I had to resort to showing students photographs of the equipment that they were supposed to be learning to use. This was not a remotely adequate substitute for real and functioning equipment. RSHT’s failure to provide adequate equipment prevented students from learning important clinical skills, including very basic skills.

7. Another problem was that administrators regularly called students out of class to sign or re-sign financial aid forms and make monthly tuition payments. I would get a list of students and was told to have those students leave class and go to see one of the financial aid staff. This was very disruptive and interfered with my ability to teach and students' opportunities to learn. I heard that loan applications were being falsified or changed, which would mean that students had to re-sign financial aid forms.

8. Sometimes RSHT did not even assign a teacher to a class. The school would instead have one person cover multiple classes that were going on at the same time. That person would just show a video to each class instead of teaching anything. I saw some of these videos. I know they were off-topic or irrelevant to what needed to be taught. The videos were used to cover up the fact that there was no instructor to teach the class. This happened with both
classroom and clinical courses. I know that students went to clinical sites and found no instructor there. They would wait an hour or two and then come back to the school.

9. RSHT also did a poor job of preparing students for certification and licensing examinations that they must pass at the end of their education. Students must pass these exams to obtain a credential in their field of study from the state or from an independent organization. Much of the material that is tested on these examinations had to be cut out of the RSHT curriculum because not enough time was allotted for the material. The information that was cut out was critical to what the students needed to learn in order to pass the certification exams. The school also failed to conduct adequate review classes to prepare the students for these exams.

10. RSHT was also unable to place students in appropriate externships. The school kept losing externship sites because students performed so poorly on their externships and could not perform basic tasks. They performed poorly because the school did not teach them adequately and give them the opportunity to develop their knowledge and clinical skills. In direct response, many health care facilities refused to take any more RSHT students as externs. RSHT knew that it could not provide enough externships to qualify students to pass the certification exams at the time it was encouraging students to come to the school. RSHT knew that its track record was terrible in getting externships, yet the school still told students to come to the school and promised they would be able to pass the certification exams and get high paying jobs.

11. Without enough suitable sites, RSHT assigned students to inappropriate facilities for their externships. For example, students who were in school to become licensed practical nurses in hospitals and in surgical settings were assigned to daycare facilities and nursing homes. Students could not get proper and worthwhile training at such facilities. Externships at such
facilities also do not count toward the clinical training hours students must have before they can sit for the LPN licensing examination. I think it is very likely that RSHT falsified records so that its students could sit for the exam. I know that students had to have a certain number of externship hours and grades in order to sit for certain exams. I saw students sitting for exams that I know did not have enough clinical hours or externship hours or grades to qualify. The only way this could have happened was if RSHT falsified records.

12. Employers have had poor experiences with RSHT graduates as well as with externs because of the poor education offered at RSHT. As a result, the school's reputation is very bad and it is difficult for RSHT graduates to find jobs in the area. Many employers simply do not want to hire RSHT students.

13. Another practice at RSHT was changing students' grades. Administrators regularly pressured me to change grades so that students would not fail out. Ms. Blakey and Ms. Barnes were two of the administrators who told me to change the grades of my students. I believe that Daisy Williams, the director of the campus, pressured Ms. Blakey and Ms. Barnes to get teachers to change the grades. Daisy Williams told me that my job was to retain all my students. I had to hand in my grade book at the end of each module and I know that after I handed it in, some students' grades were changed from failing to passing. This allowed RSHT to continue to earn money from the students because it kept the students from failing out of the school. I refused to change grades. I felt this was wrong. Students that failed should not be given passing grades or allowed to stay in the school. I left the school because I did not want any part of this practice of changing grades.

14. The vast majority of the students at RSHT's Richmond campus were poor and African-American. I believe this was intentional. Administrators admitted that the school
targeted its marketing efforts at areas that were predominantly low-income and African-American. I talked to the enrollment advisers or "reps" who were responsible for marketing efforts. They made clear to me that they deliberately targeted African-American neighborhoods. I know that particular zip codes were targeted on the basis of race. The reps were told to go to African-American zip codes, but not to white zip codes. The reps told me that African-American neighborhoods were targeted because it was thought that African Americans were vulnerable. The reps thought that African Americans would agree to take out loans and come to RSHT without asking any questions and inquiring about terms, costs, price, or what they would get from their education. These marketing efforts included targeted flyers and telephone calls. Administrators said that prospective students from the targeted areas were easier to persuade to enroll because they did not have much to lose.

15. I know that all of the recruiting reps when I was at the school were African-American. The reps told me that they knew they could flash their smiles and convince African-American female applicants to agree to take out loans without asking any questions. The reps told me that they knew many of the applicants did not have any idea what they were getting into.

16. I also know that RSHT advertised on the African-American radio stations, like 106.5 and Power 92. RSHT did not advertise on white radio stations like Q94. The reps told me that they went to African-American high schools to recruit students to come to the school. They did not care if the students were qualified or would be able to pass the certification exam. They just wanted to find "bodies" to fill spots at the school so RSHT could get more loans from the government and make more money.
17. The reps worked on commission. I do not know exactly how it worked, but they made more money if they brought in more students. The reps had quotas they were supposed to meet for each quarter. If they exceeded those quotas, the reps made more money.

18. It was obvious to me as an instructor that the school was routinely enrolling an unusually large number of students from socioeconomically disadvantaged backgrounds who did not have the skills to succeed in college, yet failing to provide them with the necessary support to overcome those disadvantages.

19. The school's admissions staff, also known as "enrollment advisors," gave prospective students lots of hope about their futures if they enrolled, but it was false hope because the school simply was not set up to make students successful. The advisors or reps made false promises about jobs that applicants would get even when they knew the students were not up to it.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: September 27, 2011.

BY: Tiana Branch
EXHIBIT

42
MARY MORGAN, et al.,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

DECLARATION OF RENEA P. BURKE

I, Renea P. Burke, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee at RSHT, a school that is also known as “Richmond School of Health and Technology.”

2. I worked as the Bursar of the Chester campus from July 2010 until May 2011. My job primarily involved collecting tuition payments from students, but I also helped with administrative duties like answering the phone at the front desk and depositing checks.

3. I felt that my supervisors and the work environment at RSHT were very unethical. My superiors repeatedly asked me to do tasks that made me uncomfortable.

4. For example, my supervisor, Debbie Harris, told me that I needed to obtain monthly tuition payments from students in any manner possible, even if it meant disrupting...
students in class, harassing them with phone calls to their homes, or repeatedly calling them into my office for meetings. These monthly out-of-pocket tuition payments started at $40, but they varied from student to student.

5. Occasionally, I would receive a notice advising me that a particular student’s monthly payments had gone up for no apparent reason. Students complained about these increases to me.

6. One time, a student who had already graduated came to me and asked why she was being charged for a $40 payment that she had already made. She showed me the receipt from that payment. When I consulted one of the accountants in the corporate office, I realized that he had recorded this student’s social security number incorrectly and had credited her payment to the wrong account. This inconsistency and poor record-keeping was typical at RSHT. If that student had not paid close attention to her records and maintained her receipts, RSHT would have overcharged her.

7. My superiors at RSHT, including Stephanie Fuina in the corporate office, also told me that I was not allowed to show students their tuition payment statements. Often students would ask to see their statements for tax purposes. On several occasions, I checked in with Ms. Fuina to see if I could make an exception and show a student his or her statement, but Ms. Fuina always said no. I think RSHT prohibited students from seeing their tuition payment statements, because it did not want them to know how much they were paying to attend RSHT.

8. One time, I was in a meeting with Ms. Harris and a student who was behind on her payments. Ms. Harris told the student that she should collect and sell aluminum cans if that’s what it would take for her to make her payments. Ms. Harris said that other students had done that in the past, at her request.
9. Ms. Harris also once suggested to me that I should inform female African American students with weaves or braids that they should stop getting their hair done so that they could afford to make their monthly payments to RSHT. I felt that this was a racially charged statement, because I thought it was odd that she was focusing on African-American women’s hair styles.

10. In general, these sorts of suggestions seemed callous and unethical. I believe that most of the students who were struggling with monthly payments should not have been recruited by RSHT in the first place. RSHT went out of its way to recruit low-income students in primarily African-American neighborhoods even though recruiters knew that these students would struggle with loan and tuition payments.

11. I know this because whenever I answered calls at the front desk from prospective students, I would ask them how they heard about RSHT. A large number of callers said they saw a sign about RSHT in the Petersburg Social Services Office. It is my belief that Petersburg is a predominantly African-American and low-income community.

12. Targeting people in this community helped RSHT receive federal financial aid because low-income people at the Social Services Office who received government subsidies were more likely to qualify for federal financial aid. Targeting people from socioeconomically disadvantaged backgrounds and particularly African Americans also allowed RSHT to take advantage of their inexperience and lack of sophistication with respect to higher education and debt. RSHT preyed upon these people.

13. While working at RSHT, I also noticed that the programs at the school were very weak. Students never had enough textbooks or medical supplies. Some students were forced to come to the front office copy machine and copy other students’ textbooks. The turnover rate for
teachers was high. Often times, students would go for long periods in a class without a teacher while they waited for a new instructor to be assigned to teach the course. Students who graduate from RSHT have an extremely difficult time finding jobs.

14. In May of 2011, I finally expressed to my superiors that I was uncomfortable with a lot of the things they asked me to do. I was fired during that same meeting. I am convinced that RSHT terminated me because I was unwilling to go to extreme measures to collect out-of-pocket payments from students, and as a result, I did not bring in as much money to RSHT as they would have liked.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: October 31, 2011.

BY: Renea P. Burke
EXHIBIT

43
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARY MORGAN, et al.,

on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH
AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

DECLARATION OF DEANNA COSNER

I, Deanna Cosner, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have
personal knowledge of the matters set forth below.

1. I am a former employee at RSHT, a school that is also known as “Richmond
   School of Health and Technology.”

2. I worked as the Registrar of the Chester campus from April 2010 until April 2011,
   when I left voluntarily. I left because I felt that the school was taking advantage of
disadvantaged students by saddling them with tremendous debts while failing to fulfill its
promises to give them a good education and open up opportunities for good careers and jobs that
paid well. I also left because school employees, including senior staff, regularly engaged in
dishonest practices. I did not want to be a part of this.
3. As the Registrar, I was responsible for all of the students' academic files. These files contained or were supposed to contain, among other things, each student's grades, attendance records, and high school transcript or GED certificate. Most of these records were kept on paper, but some were kept by computer.

4. One of my responsibilities was to send transcript request forms out to the high schools that new RSHT students had attended. RSHT was supposed to have proof of high school graduation or a GED certificate in its files within five weeks of when the student started classes. My understanding is that this was a governmental regulatory requirement.

5. Many high school transcripts and GED certificates were missing from the files when I started working at RSHT. In some cases, a transcript request form had been signed by the student but never sent. In other cases, the file did not even include a signed request form.

6. Sandra Kerrick and Debbie Harris were very concerned about the missing transcripts and GED certificates because an accreditation audit was coming up. Ms. Kerrick was the Academic Dean for the Chester campus and Ms. Harris was the School Director for the Chester campus. I believe they sent the old request forms in to the high school or state board in the case of a GED and forged students' signatures on new forms, which they also sent in. When responses came back by fax, they covered up the date on the fax transmission line and recopied the documents. I know this because the high school transcripts that we received looked different from the ones we had. They put the new documents in the students' files so it looked like RSHT had followed proper procedures and requested and obtained the documents in a timely manner. I saw Sandra Kerrick and Debbie Harris put white out on the fax transmission line and forge the seal on these documents. They then asked me to back date the documents.
7. These were not the only records that RSHT handled in a dishonest way. The school had to maintain attendance records, and show adequate attendance, for regulatory purposes. I was responsible for picking up the daily attendance sheets from each class every day. Ms. Kerrick regularly told me to mark students as “P” (for “present”) even though I knew they had been absent and the students told me they had been absent.

8. Similarly, I remember identifying two students from before I began working at RSHT whose files did not contain any information about attendance. When I came back early from lunch one day, I saw another employee entering Ps in the grade book and computer database for the students. The employee later said that the attendance information had been there all along and that I must have just missed it.

9. I sometimes identified other records that were missing from the files, only to later find them set up to look as if they had been in the files all along. I often noticed these changes right after a weekend.

10. RSHT also forged records about whether graduates had obtained jobs in their field of study. The school had to maintain and report this information for regulatory purposes. I believe that senior staff would come in over the weekend and sign students’ names on forms saying that they were working in their field of study.

11. RSHT also changed students’ grades from failing to passing. I was familiar with this because I was responsible for receiving grades from instructors and entering them. I also had to notify Ms. Kerrick, the Academic Dean, when Ds and Fs were submitted by instructors. I remember one time when six students were given Fs in the Anatomy and Physiology class. I reported this to Ms. Kerrick, and then found that four of the six Fs were changed to Cs by the end of the day. I saw grades changed like this regularly. This allowed the students to continue their
enrollment at RSHT, which allowed RSHT to continue collecting their federal financial aid dollars.

12. RSHT engaged in similar practices with respect to financial aid forms. I saw Tammy Raines cut students’ signatures out of documents in students’ files and paste them onto financial aid forms that were submitted to the federal government. Ms. Raines is an RSHT employee and is the sister of RSHT’s founder, Margarett Knight. I also saw a student’s parent’s 2007 tax return that was made to look like a 2009 return by changing the “7” into a “9.” I believe Stacy Ruiz, the financial aid officer, saw Tammy Raines cutting out the signatures. Later, Stacy showed me a box of documents and forms that had signatures cut out. Stacy held up some of the documents with signatures cut out to show me. I never saw Stacy Ruiz cutting out signatures or forging documents. Stacy told me that she was very concerned about the practices she saw going on.

13. Prior to audits, I would be asked to get signatures from students for forms that were missing signatures. If I could not get a signature, I believe that Tammy Raines and others forged signatures on these documents for purposes of the audit. I could tell this by looking at the signatures. On one occasion I recognized Joyce Whitehurst’s handwriting on one of the supposed student’s signatures. I confronted her about this and she said: “you gotta sign what you gotta sign.” I also know that some students were taken out of the school database prior to an audit.

14. Similarly, Ms. Harris once asked me to mark a document as “received” on a particular date even though we both knew that it had not been received on that date.
15. I was present once when Maxine Stine, the Director of Education from RSHT's corporate office, accused Ms. Harris of engaging in fraud. I was asked to leave before they discussed the matter in detail.

16. I sometimes cried because all the dishonest things going on around me at RSHT made me scared. I felt threatened not to talk about these things. In the summer of 2010, Ms. Harris said a news channel was doing an expose on proprietary colleges and that we should keep our mouths shut if we valued our jobs. I always felt like my job was at risk if I spoke up about the dishonest practices at RSHT.

17. There were many problems at RSHT in addition to these kinds of dishonest practices. One was that the school often did not assign qualified teachers for classes. For example, Ms. Kerrick taught a Medical Assisting class even though her degree was in physical education.

18. The Community Home Health program was simply a mess. Well into the program the students learned that the program had not been set up to lead to any credential and that RSHT was going to send them to another school to take a short Certified Nursing Assistant class. The students were extremely upset because they could have just enrolled in a CNA class to begin with and saved a huge amount of time and money. I believe that senior administrators knew about the credential problem long before they told the students.

19. The overall quality of the education at RSHT was so poor that many students who got good grades could not pass the certification or licensing examinations offered by independent or governmental entities. Admissions staff regularly told prospective students that RSHT would prepare them to pass these exams, but it was not true.
20. RSHT specifically targeted low-income people for enrollment. Financial aid officers asked prospective students if they received food stamps or assistance under other anti-poverty programs. People who received such assistance were more desirable because it meant they were eligible for more financial aid. Targeting people from socioeconomically disadvantaged backgrounds also allowed RSHT to take advantage of their inexperience and lack of sophistication with respect to higher education and debt. RSHT preyed upon these people.

21. The school’s targeting of low-income people was reflected in its disproportionately high number of African-American students.

22. I have contacted the State Council on Higher Education for Virginia to explain my concerns about RSHT. I do not think the school should be allowed to continue to operate the way it has or to victimize more students.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: October 4, 2011.

BY: ____________________________
    Deanna Cosner
MARY MORGAN, et al.,

on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

DECLARATION OF BRENDA DREW

I, Brenda Drew, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee at the Richmond campus of RSHT, a school that is also known as “Richmond School of Health and Technology.” I am African-American, as was the vast majority of the student population at the Richmond campus.

2. I hold a Doctorate in Education from the University of Virginia and have decades of experience working in the field of education. Among other positions, I have served as a high school principal in Richmond and am currently a consultant to Virginia Union University, an historically Black College and University (HBCU) in Richmond.

3. I was the Academic Dean of RSHT’s Richmond campus. I interviewed for the position with Maxine Stine and Melanie Chewning. Maxine Stein was the Director of Education
for RSHT and worked at the corporate office. Melanie Chewning was the Director of the Richmond campus.

4. I began work at RSHT in May 2010. I resigned voluntarily in September 2010. I left because I felt that RSHT was not providing a remotely adequate education to its students, that the school was doing a great disservice to its students, that the senior staff at the school was not interested in improving its educational programs, and that the school’s sole purpose was to earn money. I did not want to be a part of this. I also left because senior staff treated most employees and students, including myself, very poorly and unprofessionally.

5. I spent my first week as an RSHT employee in training. The training consisted primarily of reviewing the school’s curriculum guide, which Ms. Stine had developed, and other RSHT handbooks. I was surprised to find that the curriculum guide contained very little information about the content and goals of the school’s educational programs. Based on my many years of experience in education, I know that a curriculum guide should set forth in considerable detail information about what students are supposed to learn in each class and program. RSHT’s curriculum guide did not.

6. There were many ways in which RSHT failed to provide the education its students deserved, some of which I describe here.

7. One of the biggest reasons that the education provided by the school was poor was that the school did not provide any support to help instructors develop their teaching skills. This kind of support was badly needed at RSHT because RSHT hired many instructors without any significant teaching experience. For example, the school would hire instructors in Surgical Technology and Pharmacy Technology who had not taught before. Even with the best intentions, instructors without teaching experience and teaching skills typically are not effective
in the classroom. Given its hiring practices, RSHT should have provided regular staff development opportunities for its instructors. The students suffered educationally because the school did not provide these opportunities.

8. RSHT also failed to offer students the kind of broad developmental support that they needed, such as mentoring and tutoring. The vast majority of the students at RSHT were from educationally and socioeconomically disadvantaged backgrounds. They did not have the skills, knowledge, and habits needed for success in higher education or in skilled professions. This was apparent to me as soon as I started working at RSHT. I believe it was RSHT’s goal to attract students like this because the students’ inexperience and lack of sophistication made it easier to persuade them to enroll. Senior employees must have been aware, like I was, that the vast majority of RSHT’s students did not understand how to succeed in higher education or skilled professions. Many of these students had been out of contact with educational institutions for a long period of time. Because RSHT relied on such students to fill the school and to make money, the school was obligated to give the students the developmental support they needed to learn how to succeed in school and work. The school made no effort to provide this support, however, and the students were left to struggle without the assistance that RSHT should have given them.

9. Another way in which RSHT failed its students was by simply neglecting to assign teachers to classes. The Surgical Technology students, for example, went six weeks (an entire mod) without a qualified surgical technology teacher after one teacher was fired. Instead of finding a new teacher, RSHT arranged for a former Dean named Mark Russell to cover the class. Mr. Russell was not qualified to teach the course and did not try to teach it. Instead, he
would play a video at the beginning of class and then tell the students to leave well before the class was scheduled to end.

10. RSHT’s decision to assign Mr. Russell to the class was consistent with its practice of assigning administrative staff as substitute teachers instead of people who were qualified to teach the particular course. I and other administrators were frequently required to act as substitute teachers in classes that we were not qualified to teach because the assigned instructors were often absent. I objected to Ms. Chewning about this practice because I felt it was detrimental to the students, but the practice was not changed.

11. One of the things I learned by substituting was that the students in any given class typically were working from different editions of the textbook. This makes it very difficult for even an experienced and competent instructor to teach a class effectively. RSHT was responsible for this problem because RSHT purchased and distributed the textbooks using the students’ tuition dollars.

12. RSHT also failed to provide adequate supplies and equipment for laboratory classes. The laboratory classes are very important because RSHT’s programs involve healthcare fields. Students are supposed to get hands-on clinical training in these classes so that they learn how to work with the supplies and equipment that are used regularly in the fields they are preparing to enter. RSHT’s failure to provide these materials prevented students from learning important practical clinical skills, including very basic skills that give them the practical experience they need.

13. Similarly, the school did not have nearly enough computers for the computer course that students were required to take.
14. RSHT also failed to provide appropriate externships for its students. This was a very significant problem in all of the programs, but it was especially important for the Surgical Technology students because they cannot become certified without sufficient operating room experience. They are supposed to gain this experience through their externships which are required for certification. These externships involve a large number of required operating room cases. During the time I worked at RSHT, the only place surgical technology students were sent was to a “central sterile” externship, where they merely clean and prepare instruments. They do not gain any practical operating room experience at all in central sterile. Hospitals and other healthcare facilities did not want RSHT students in their operating rooms because the school’s reputation was so bad.

15. I told Ms. Chewning about this problem but she did not care, even though she was the highest ranking employee at the Richmond campus and the lack of proper externships prevents graduates from becoming certified as surgical technologists. She told me that it was somebody else’s job to worry about finding externships for students, not hers.

16. RSHT’s Community Home Health (“CHH”) program was a debacle that served to enrich the school at the expense of its students. The program’s curriculum was not aligned with any credential. The students began asking Ms. Chewning lots of questions when they realized that they were not going to earn any credential, but Ms. Chewning ignored them. In the end — and only after more than a dozen students complained to the State Council of Higher Education for Virginia — RSHT sent the CHH students to a short Certified Nursing Assistant program at another school. That only made them eligible for the low-level CNA credential, however, even though the students paid RSHT over $10,000 each for the CHH program. The students could
have become eligible for this credential for a small fraction of the cost and time they spent at RSHT if they had gone somewhere else instead of RSHT.

17. The CHH externships were also inadequate. The only externship the school could find for the CHH students was with a nursing agency in Petersburg. Even then, the facility would only permit the students to "shadow" its employees and would not let them do any hands-on work. This made the externships of very little value. In addition, setting up externships in Petersburg placed a great hardship on the CHH students, many of whom did not have cars and/or could not afford the gas to drive back and forth between Richmond and Petersburg every day.

18. Another problem at RSHT was the way the school handled things when students were behind on the out-of-pocket payments that they had made to the school every month. These payments were typically $40 and covered the portion of tuition that student loans did not. A financial aid staffer would come to the classroom door with a list of students who were behind and call out their names. Students who were behind by a month or more generally were not permitted to continue coming to class until they were caught up. This interfered substantially with students' academic progress, even though only a very small portion of students' tuition was involved. Moreover, the public way in which the school did this was embarrassing and entirely unnecessary.

19. RSHT also changed students' grades. Senior administrators would change the grades of students who were failing into passing grades. This allowed RSHT to continue to earn money from the students because it kept the students from failing out of the school. I remember notifying Ms. Chewning about one student who was receiving an F because of poor attendance, and learning later that the student had instead received a passing grade. I know that senior administrators, including Ms. Chewning, changed failing grades of students to passing grades.
20. I remember another incident in which RSHT used a different kind of dishonest tactic to increase the money it was making off of a student. The student had once been enrolled in RSHT's nursing program and had taken and passed four general education classes. When she later reenrolled at RSHT in the Medical Assisting program, Ms. Chewning said that she had to retake the very same general education classes. In other words, RSHT refused to honor its own credits, which allowed it to charge the student more money for the Medical Assisting program than was justified. I told Ms. Chewning that this made no sense and was improper, but she refused to change her mind.

21. I believe RSHT intentionally recruited African-American and low-income students because it believed it could take advantage of their limited experience and sophistication with respect to post-high school education. RSHT recruiters and administrators knew that they could make a lot of money in the African American community because they could find underprivileged students in this community who would qualify for the government loans that RSHT needed to be profitable. Recruiters were put under pressure to find as many new students as they could. They had quotas that they had to meet. Students were recruited for the Richmond campus from low income housing projects located in the African American community. The Richmond campus is located on the "bus line," which was highly accessible to the African American areas of Richmond. I believe the school's location on the bus line makes it easy for it to target the African American community.

22. Melanie Chewning met with the recruiters every week to make sure they were getting as many new students as possible. Even though she was my supervisor and accountable for the instructional program, she met with me and her staff far less frequently than the recruiters.
23. I know that the advertisements for RSHT appeared on TV at the same time as the Montel Williams Show.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: September 27, 2011.

BY: Brenda Drew
EXHIBIT

45
MARY MORGAN, et al.,

on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,

Defendant.

No. 1:11-cv-01066-GK

DECLARATION OF CATHLEEN A. FREIBURGER

I, Cathleen A. Freiburger, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee at the Chester campus of RSHT, a school that is also known as "Richmond School of Health and Technology." Even though the Chester campus is situated in a majority white area, the student body is majority African-American.

2. I was hired as Career Services Placement Coordinator for the Chester campus in April 2010. I was hired to work with students to place them in externships and help them find permanent jobs.

3. I only stayed at RSHT until December 2010, when I left voluntarily. I left because senior RSHT employees falsified records and wanted me to falsify records as well. I also left because I felt like RSHT was ruining its students' lives by saddling them with
tremendous debts while failing to fulfill its promises to prepare them for good careers and jobs that paid well. I did not want to be a part of this.

4. On my very first day at RSHT, I was very surprised when Sandra Kerrick, the school director, handed me a textbook and told me that I would be teaching the Career Development course. I was not trained to teach from this textbook or to teach this course. I was supposed to teach the students at the end of their time at the school, when they were finished with their curriculum. I wound up teaching this course to students from the Medical Assisting, Pharmacy Technician, and Community Home Health programs. But the students were not well served, because the textbook was not the right one for this course.

5. Finding appropriate externships for students was very difficult and I believe the school failed to live up to its promises and obligations to the students to place them in appropriate externships. A major reason for this is that many healthcare facilities in the area will not accept RSHT students as externs. They refuse because they have taken RSHT students as externs before and had bad experiences. The students were poor externs because they had not learned nearly enough at RSHT and were extremely unprepared to work in a real healthcare setting with responsibilities for real patients. I spoke with staff at some of these facilities and they told me that they were shocked at how little RSHT students knew and how unprepared they were.

6. For much of the time that I was at RSHT, there was only one facility for which we could place Surgical Technology students who studied at the Richmond campus. That facility was Henrico Doctors’ Hospital. Henrico, however, would generally only let us place students in its central sterilization division (also known as “central sterile”), not in the operating room. This was not an adequate placement because Surgical Technology students must participate in a
minimum number of surgical procedures to become certified after graduation from RSHT. Time in central sterile does not count toward this requirement. To the best of my understanding, students without enough procedures cannot sit for the National Board of Surgical Technology and Surgical Assisting’s written examination. As a direct result, many students were ineligible for certification even though they graduated from RSHT. Furthermore, central sterile fails to provide students with the kind of hands on surgical experience they need to help them find and succeed in surgical technology jobs after graduating.

7. Another way in which RSHT prevented students from having a worthwhile externship experience was by failing to tell them before they enrolled that most externship sites were only accessible by car. This was very important because many students did not have a car or could not afford to buy the gas needed to drive to and from an externship site every day. As a result, many students not only were denied what should have been valuable real world experience as an extern, but they were also ineligible to graduate because satisfactory fulfillment of RSHT’s externship requirement is needed to graduate.

8. In the end, few students had appropriate and educationally beneficial externship experiences. Senior RSHT personnel knew about these problems because I told them. I do not think I was the first to raise these problems with senior staff. RSHT nonetheless continued to enroll as many students as it could, even though it knew that it did not have the ability to meet their educational needs.

9. I knew that RSHT senior administrators knew about this problem because the forms that students filled out in which they talked about their experience at the school year after year made clear that they had been unable to get externship experience.
10. One of my responsibilities was to certify that students had completed the externship requirement. But because of the problems described above, among others, many students did not. Nonetheless, I was instructed by my superiors at RSHT to include false documentation in students’ files saying that they had completed their externship. Sandra Kerrick told me to do this. She told me: “you will do whatever needs to be done,” and that “you will not fail these kiddies.” By this, Ms. Kerrick meant that RSHT did not care if the students got jobs or could pay their loans, but only that we needed to keep the students in the school so RSHT could get the government loans that made the school profitable. I refused to falsify records even though that is what I was told to do.

11. In addition to the externship problems, RSHT students also did poorly in finding jobs in their field of study. The school tried to hide its poor record in job placement by falsifying records, including records that were subject to audit. This included documents called “Graduate Status Form” and “Graduate Employment and Evaluation Questionnaire.” These forms ask graduates about their current employment status and their opinion of RSHT. I saw the School Director, Debra Harris, forge both substantive answers and signatures on these forms. I was instructed that I was not to let people say anything bad about RSHT when they filled out these forms. Many people did say bad things about RSHT on these forms, however, and the school would destroy those forms. I did not participate in destroying responses that the school was unhappy with.

12. Another dishonest practice at RSHT was to change students’ grades. I learned that senior administrators would change the grades of students who were failing into passing grades. This allowed RSHT to continue to earn money from the students because it kept the students from failing out of the school.
13. Deanna Cosner, who was the Registrar at the Chester campus, told me that she personally saw Stacy Ruiz falsify student loan applications by forging names and signatures on the applications. Stacy Ruiz was a financial aide who worked at the Chester campus. Deanna and Stacy shared an office so Deanna could see what Stacy was doing. These were loan applications that were to be sent to the federal government to qualify RSHT to receive federal student loan funding.

14. RSHT was also dishonest in how it dealt with students on the front end, when the school was trying to persuade them to enroll in the first place. One of the school’s marketing techniques was to hold “open houses” on campus. Administrators and teachers were required to attend these events and give a short speech saying that RSHT was a wonderful school, that its students received a top education, and that enrolling would open up opportunities for good, well-paying jobs in good careers. Speakers strongly implied that students would have no difficulty finding a good job after graduating. Speakers also told students that externships would be available at night when they knew that was not true for all the programs. The message that the school sought to communicate was that “RSHT will make your dreams come true.” Much of the information conveyed to prospective students at these events to entice them to enroll was false. Through open houses and RSHT’s other communications with prospective students, the school sought to take advantage of less sophisticated people who lacked the experience to see through the school’s slick sales pitch.

15. RSHT’s single-minded concern with making money at the expense of what was good for its students was also evident in how little regard it had for prospective students’ specific career goals and interests. If people expressed interest in a particular program but there were no
openings in that program at the moment, admissions personnel would use high pressure tactics to persuade them to enroll in a different program instead of waiting for the program they wanted.

16. RSHT’s Community Home Health program demonstrates the school’s disregard for its students’ best interests. Students paid over $10,000 for the program, but the school failed to align the program’s curriculum with any credential offered by a state or independent body. RSHT wound up paying less than $1,000 per student to enroll the Community Home Health students in a Certified Nurse Aide program at another school so that the students would be eligible for a credential, even a low-level one. The students wound up paying more than $10,000 for an education worth less than $1,000, but RSHT kept the difference.

17. I also believe that the school had an obligation, which it did not live up to, to help its students understand more about the significant financial responsibilities they were assuming to attend RSHT. It was clear that most of the students at RSHT had little experience with and understanding of money management and debt, yet the school aggressively pushed them into taking out large federal student loans. Instead of helping the students understand what they were doing financially, I believe the school took advantage of its students’ lack of financial sophistication. The school did this for its own financial gain and at the expense of both its students and the federal government, which supplied the funds necessary for RSHT to exist and make money.

18. I believe RSHT targeted African American and minority communities in particular because they thought individuals in these communities would be easier to recruit for their fraudulent programs. This was clear to me from the advertising that the school did, and from what I saw about how the school went about recruiting students, and where admissions employees went to recruit students. I also know this because I heard the sales pitch that the
recruiters made to prospective students in these communities. It was like listening to a used car sales person sell a product that was a lemon to an unsuspecting and trusting customer desperate to have a car.

19. RSHT put information on its website that it knew was not true. For example, RSHT advertised that it was an approved testing site for Pharmacy Technician and Community Home Health. This was not true. I told senior administrators that they should take this off the website but they did not.

20. One of the dishonest practices that caused me to leave RSHT in December of 2010 was the pressure I was put under to modify and falsify records for an upcoming audit. The school director Debbie Harris wanted me and others to change records to make it appear that RSHT had more graduates placed in jobs than it did. I refused to do this. I learned that the directive to change these records had come from Carolyn Lake in the front office. These records went back to 2009. I left the company rather than participate in what I thought was an unethical and fraudulent practice.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: September 29, 2011.

BY: Cathleen A. Freiburger
ADDENDUM DECLARATION OF CATHLEEN A. FREIBURGER

I, Cathleen A. Freiburger, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. On September 27, 2011, I provided a declaration in the above case.

2. About a week later, I spoke with Deanna Cosner, a former coworker of mine while I was employed at RSHT. After that conversation, I realized that my declaration contained an inaccuracy. Paragraph 13 of the declaration states that Deanna had told me that she saw Stacy Ruiz, a financial aid officer at RSHT, falsify student loan applications by forging names and signatures. I realize after talking with Deanna that I confused Stacy Ruiz with Tammy Raines. Deanna told me that she had seen Tammy Raines, Stacy’s supervisor, forging signatures on student loan applications while she was sitting at Stacy’s desk, not Stacy Ruiz.
I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: October 11, 2011.

BY: Cathleen A. Freiburger
Cathleen A. Freiburger
EXHIBIT

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DECLARATION OF SELENA R. HIGGINS

I, Selena R. Higgins, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee of RSHT, a school that is also known as “Richmond School of Health and Technology.” I was the main instructor for the Community Home Health (“CHH”) program at the Richmond campus from January 2010 through May 2011. I left voluntarily when the last of my CHH students finished the program.

2. I have been a Registered Nurse since approximately February 2011. I was a Licensed Practical Nurse for approximately twenty years before becoming a Registered Nurse. I have worked as a nurse in a variety of healthcare settings over the last twenty years.
3. I interviewed for my job at RSHT with Mark Russell, who was the Dean of Allied Health at the Richmond campus. Allied Health encompassed all of the programs offered at the Richmond campus except for the Practical Nursing program.

4. RSHT was about to begin its 35-week CHH program when I interviewed and Dr. Russell was searching for an instructor for the program. Dr. Russell showed me the curriculum for the first module (classes at RSHT are divided into modules, which last five weeks). It appeared to me that the CHH program was essentially a Certified Nurse Aide ("CNA") program with a home healthcare focus, and I asked Dr. Russell if this was correct. He said it was. CNAs are licensed by Virginia through its Board of Nursing. CNAs typically provide low-level assistance in nursing homes and in patients’ homes.

5. After I started teaching at RSHT I obtained a copy of the full 35-week curriculum from Melanie Chewning, who was the Director of the Richmond campus. I was very concerned when I reviewed the full curriculum, because I knew that it did not align with any certification or license. I promptly addressed this concern to Ms. Chewning and told her that without any credential, the students would be largely unemployable. I told her that even if the students could get a job as a home health aide after graduating, agencies that hire aides without the CNA credential typically pay only minimum wage and do not provide benefits. Ms. Chewning eventually told me to talk to Maxine Stine about this. Ms. Stine was the Director of Education for all of RSHT and worked at the corporate office.

6. I met with Ms. Stine and told her that the CHH program is really a CNA program and needed to have a credential attached to it so that the students could find jobs after graduating. I did not know at the time that RSHT had previously offered a CNA program (technically, a
"nurse aide education program") that was approved by the Virginia Board of Nursing, but that the Board had rescinded its approval in 2005.

7. Ms. Stine replied that the CHH program was a “Home Health” program, not a CNA program. There is no such thing as a “Home Health” credential in Virginia, however. I told Ms. Stine that whatever she called the program, the people who perform the tasks from the CHH curriculum in patients’ homes are typically CNAs. I also told her that the program was not going to work as it was designed. Ms. Stine was very defensive about the CHH program and refused to acknowledge any problems with it.

8. I repeatedly complained to Ms. Chewning that the CHH program was fundamentally flawed because the students would not be eligible for any credential. At one point I suggested just turning it into an official CNA program. Ms. Chewning replied that the school had a CNA program once before and could not “go that route,” or words to that effect.

9. My complaints to Ms. Chewning and Ms. Stine continued over the course of many months. Ms. Chewning told me that she explained my concern about the CHH program to RSHT’s CEO, Carolyn Lake, but I never had the opportunity to speak to Ms. Lake about it directly. All this time, RSHT was enrolling more students in the CHH program.

10. My concern that the CHH program was deeply flawed because it would not lead to some kind of recognized credential was confirmed by area healthcare employers. RSHT had what it called an “advisory board,” which consisted of healthcare providers from various facilities in the area. They would come to the school periodically and RSHT would promote its programs at these meetings. I knew some of the advisory board members from my many years in nursing.
11. I expressed to my RSHT supervisors that we should cancel the advisory board meeting because the CHH program was not right and we should not be promoting it. I was overruled by Calvin Brown, the head of career development at the RSHT Richmond campus.

12. The advisory board members said they would not be able to hire graduates of the CHH program if they did not earn a relevant certification. They also said they could not help provide externship opportunities for the CHH students because graduates of the program were not eligible for any certification.

13. The CHH students eventually learned that the program was not set up to lead to any certification. They were extremely upset. The students told me that when RSHT was trying to get them to enroll, the school told them that they would earn a credential in home healthcare and that they would be able to earn much more than minimum wage. Students were also told that completing the CHH program would allow them to do a variety of other things, including opening their own home health businesses and working for home health agencies. The students sent letters of complaint to Ms. Chewning and to the State Council of Higher Education of Virginia, a state agency. I went to a meeting that one student arranged with Ms. Chewning, who said that she was unaware of the credential issue. By that point I had been telling her about it for months and the students had sent her letters about it. Ms. Chewning claimed that she had never received the letters. I know this was not true, because I was the one who delivered the letters to her.

14. After the students sent their complaints to the state and close to when most of the students were going to finish the CHH program, RSHT decided that the students should sit for the Patient Care Technician ("PCT") examination. This exam is given by the National Center for Competency Testing, an independent non-governmental agency that offers several medical
certifications. I reviewed the PCT materials and it was apparent to me that the CHH curriculum was not aligned with the PCT exam, and that the CHH students would therefore not do well on it. I advised the students against taking the PCT exam, because I knew that the CHH curriculum had not prepared them for it. The students who took the PCT exam did not pass.

15. RSHT’s next attempt to address the credential problem was to send the CHH students to a CNA course at a different for-profit school in Richmond, the Professional Career Institute (“PCI”). This was a six-week course and cost less than $1,000. RSHT paid this cost, but did not pay the CHH students back any of the more than $10,000 they had each paid to attend RSHT. RSHT also refused to pay the fee for taking the CNA exam. I know of some students who have not been able to sit for the CNA exam, because they cannot afford the exam fee.

16. PCI is able to offer a CNA course in only six weeks, because Virginia only requires CNA programs to include 120 hours of training. RSHT’s CHH classes, however, met several hours a day, four days a week, for 35 weeks.

17. One of the CHH students, Mary Morgan, told me that she had previously been a CNA. This meant that she didn’t need to take any class to get her CNA license reinstated, she could just study on her own and take the examination. Ms. Morgan told me that before she enrolled at RSHT, she had told the admissions office that she had previously been a CNA.

18. The CHH program had significant flaws even beyond the credential problem. One of these was its inability to place students in appropriate externships. RSHT’s reputation in the community is so bad that it is very difficult for the school to place students in externships. The only externship site that RSHT could find for the CHH students was a home health care agency near Petersburg. That agency would only take two students as externs at a time. Also, this location was very problematic because many of the CHH students did not have cars and/or
could not afford the gas money to go so far every day. Since the school advertised that it was “on the bus line,” it did not make any sense to force students to go to an externship that required a car. Students told me that, before they enrolled in RSHT, they were not told they would need to drive to an externship.

19. Several students completed the CHH program but were not allowed to graduate because they were unable to complete the externship requirement. The externship requirement was for 100 hours. For CNA programs, Virginia requires only 40 hours of skills training through direct client care.

20. Another major problem with the CHH program was the lack of resources. The CHH curriculum required a certain amount of hands-on laboratory time, but RSHT did not give the students sufficient access to the lab to come close to meeting that requirement. Even when RSHT would schedule times for the students to go to the lab, the lab was very often not available during those times. Time in the lab is important because it allows students to get hands-on clinical training with the supplies and equipment they will need to use when they finish school and are working. RSHT’s failure to provide enough lab time prevented students from practicing and adequately developing important clinical skills, including very basic skills.

21. The vast majority of the students I encountered at RSHT were poor, African-American, and lived in public housing. I do not think this was by chance. To the contrary, I believe that RSHT marketed itself to attract students from educationally and socioeconomically disadvantaged backgrounds because their inexperience and lack of sophistication made it easier to persuade them to enroll.

22. Consistent with this, I learned from talking with my CHH students that they did not have a very good understanding of the federal student aid programs, even though RSHT
arranged for them to borrow large amounts of money through those programs to pay their tuition. After they told me that RSHT filled out their federal FAFSA forms, I brought in a blank FAFSA and the students did not recognize it. They told me that Jennifer from the Richmond admissions office had given them only a vague explanation of how their loans worked and told them to sign the papers that the school filled out for them.

23. Even though RSHT did not explain the financial aid forms and programs to the students, it frequently called students out of class to sign the forms. RSHT would also call students out of class to have them pay school fees. This was very disruptive and interfered with my ability to teach and students’ opportunities to learn.

24. RSHT also acted unethically in other areas. For example, RSHT wanted me to teach the CHH students how to administer medications, but I refused. It would be illegal for them to administer medications without a license, and they were not going to earn the necessary license by attending the CHH program at RSHT.

25. It is my understanding that RSHT also manipulated its records about the number of graduates who were employed in their field of study, information which I understand must be maintained for regulatory purposes. If a graduate was working in an administrative or janitorial job in a hospital, for example, RSHT officials would claim that the job was in the person’s field of study simply because it involved healthcare, even if the job had no other connection to what the person had studied.

26. I feel terribly for my CHH students because RSHT set up the program to take advantage of them for financial gain. I did my best for the students, but I believe they would have been better off if instead of going to RSHT, they had just taken a much shorter and much less expensive CNA class at another school.
I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: October 7, 2011.

BY: Selena R. Higgins

Selena R. Higgins
MARY MORGAN, et al.,

on behalf of themselves and all others similarly situated,

Plaintiffs, No. 1:11-cv-01066-GK

v.

RICHMOND SCHOOL OF HEALTH AND TECHNOLOGY, INC.,

Defendant.

DECLARATION OF STACY RUIZ

1, Stacy Ruiz, hereby state as follows:

I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth below.

1. I am a former employee of RSHT, a school also known as the “Richmond School of Health and Technology.”

2. I began working as a financial aid officer at RSHT’s Chester campus in late June 2009, and I worked there until August 12, 2011. My job involved handling and processing students’ financial aid applications. Prior to working at RSHT, I was a military police officer at Fort Drum, in New York, and I later worked for about three years as a student account officer at Platt College, a private college located in California. I am familiar with financial aid documents and the procedures for receiving federal financial aid.
3. I felt that my supervisors and the work environment at RSHT were very unethical. There was also a complete lack of consistency and professionalism at RSHT. Policies were rarely written down, and, to the extent that some policies were in writing, they often were not followed. For example, when I first began working, I would explain to students the financial information contained on their ledger cards. I was then told never to let students see this information. However, in early 2011 when RSHT learned that it would be audited, I was told that if the auditors asked, I was to say that we did in fact provide students their ledger information, even though I had been directed not to provide that information.

4. I was told not to share other financial information with students as well. For instance, I was told never to give students any disbursement notification forms we received from the federal government on their behalf. I was also told not to tell graduating students how much money they had taken out in loans. Instead, my supervisors told me to refer students to the National Student Loan Database System.

5. I also witnessed my direct supervisor, Tammy Raines, fraudulently obtain student signatures on financial aid documents by cutting and pasting signatures and having students sign blank forms. These documents included Institutional Student Information Record ("ISIR") correction forms and loan change forms. ISIR correction forms are used to correct students' financial aid information on file with the federal government. Loan change forms can be used to request additional loan amounts from the federal government. Anytime either form is submitted to the federal government, it is required to have the particular student's signature on the form.

6. I was told by Raines to have students sign blank ISIR correction forms, so that if a change to that student's financial profile needed to be made, RSHT would have a signature on
hand and would not need to contact the student. Raines also told me to have students sign blank loan change forms.

7. When Raines did not have a blank form already containing a student's signature, she would forge that student's signature by cutting and pasting the signature on to the document. She would cut out the student's signature from another form, paste that signature onto the unsigned form, and then photocopy the document with the pasted signature to make it look like an original.

8. One time, I saw Raines with scissors cutting out a signature from a student's financial aid document. I left the office, and when I returned, I saw a large box containing many documents waiting to be shredded. About thirty of those documents were ISIR change forms with holes where the signatures had been cut out. I showed Deanna Cosner, a co-worker, some of the documents with holes in them.

9. By having blank forms containing student signatures on file, or by cutting and pasting student signatures, RSHT was able to request additional loans from the federal government in students' names without the students knowing that additional loans were being taken out and without the consent of those students.

10. RSHT officials knew that I was uncomfortable with their practices, so they did not ask me to forge or change signatures. I never forged or cut and pasted signatures. I think doing something like that is unethical and wrong.

11. Other RSHT practices seemed wrong to me. For example, Raines would request the full amount of available federal subsidized and unsubsidized loans for students, even if that full amount was unnecessary given a particular student's financial profile. In such cases, the students were told that a certain amount of loans were being taken out on their behalf, but, in
fact, a higher amount of loans were actually taken out. These additional funds were taken off the ledger sheets upon the students' graduation, but I do not know whether RSHT ever returned these additional funds to the federal government. Even if the additional funds were returned to the federal government, the students were charged interest on some of the loans while they were enrolled. These additional amounts should not have been taken out in students' names, and the students never should have been charged that interest.

12. In one instance, I know that RSHT was receiving more money in federal loans and grants than was necessary for that student. The student requested to have the additional money reimbursed to her, rather than to the school. I informed the student that to receive the reimbursement, she needed to write a letter indicating that she wanted the additional funds reimbursed as stated in the RSHT student handbook, and I provided her with a federal form detailing the necessary procedure. The student later met with Debbie Harris, the School Director, who told her that RSHT would not reimburse any money to her until she graduated or withdrew from the program. I knew that withholding the money in that manner was wrong, because it was contrary to the RSHT student handbook.

13. Another time, the father of a student contacted the RSHT financial aid office. He was upset because RSHT had requested more loan money for his child than RSHT had indicated it would request when the student initially enrolled. It is my understanding that the additional money was taken out in the student's name without the student's knowledge or consent. Because the father complained, Raines sent the money back to the federal government. The father only noticed this discrepancy because he looked closely at the original loan documentation provided to his child, and then noticed that additional loans had been taken out. A student who did not pay very close attention to these documents might not have noticed such a discrepancy.
14. RSHT also had the following policy: If a student attended at least 25% of a semester, she would be charged 50% of the charges for that semester; if a student attended 50% of a semester, she would be charged 75% of the charges for that semester; and if a student attended 75% of a semester, she would be charged 100% of the charges for that semester. Sometimes, a student’s federal loans would not cover the additional amounts charged for periods the student did not attend. In those cases, RSHT would sue students in court for the balance of the unpaid funds. Officials in the RSHT collections department would brag about their success rate in such actions. These officials would also harass students at home and on Facebook. I have seen former RSHT students working at low-paying jobs, such as at Sheetz, who have told me that RSHT sued them for unpaid charges.

15. I also know that RSHT officials changed students’ grades, because I would hear them talking about it.

16. Many RSHT students did not understand the financial obligations they were getting into by enrolling at the school. Several students who had been enrolled at RSHT for months admitted to me that they could not read. I was amazed that RSHT had enrolled those students. Without the ability to read, those students could not review their loan documentation and almost certainly could not understand their loan obligations.

17. It was clear that many other students also did not understand their obligations. When students were about to graduate, I would conduct exit interviews with them, during which I explained loan obligations. Students would sometimes incorrectly tell me that they did not have any loans. Those students did not understand that they had taken out loans to attend RSHT. They believed that by filling out the financial forms upon enrollment and during their time at RSHT they were receiving grants, not loans.
18. It seems pretty clear to me that RSHT was targeting people of color. About 80% of the students at the Chester campus were people of color. Many students lived near each other in communities like Petersburg and Colonial Heights. Most students lived in public housing and received food stamps and other subsidies. Targeting people in these communities helped the school receive federal financial aid. Because people who lived in those communities were likely to receive government subsidies, they also would be more likely to qualify for federal financial aid.

19. While working at RSHT, I noticed that the programs at the school were very weak. The turnover rate for teachers was high. Often times, students would go for long periods in a class without a teacher while they waited for a new instructor to be assigned to teach the course.

20. Students who graduate from RSHT have an extremely difficult time finding jobs. One student told me that it was a “joke” for her to have gone to RSHT, because the credential turned out to be meaningless to employers. She said that potential employers “laughed” at her.

21. Because of the unethical practices and inconsistent and unprofessional work environment, I was uncomfortable working at RSHT. Cathy Freiburger, a co-worker, questioned RSHT’s practices. At first I was scared that I would be fired if I openly questioned RSHT’s practices. Eventually, I decided to voice concerns with the way that RSHT was operating to Raines. Raines called me into a meeting with Harris and Carolyn Lake, the CEO of RSHT. I told them about some of my concerns, and that it felt like they were trying to find a way to get rid of me. I was fired shortly thereafter. I am convinced that RSHT terminated me because I would not participate in what I thought were unethical practices, and because I knew a lot of information about their improper conduct.
I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

EXECUTED WITHIN THE UNITED STATES ON: October 31, 2011.

BY: Stacy Ruiz