Attorney No. 99000

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

PEOPLE OF THE STATE OF ILLINOIS, Plaintiff, vs. ALTA COLLEGES, INC., a Delaware Corporation; WESTWOOD COLLEGE, INC., a Colorado Corporation d/b/a Westwood College and Westwood College Online; WESGRAY CORPORATION, a Colorado corporation d/b/a/ Westwood College-River Oaks and Westwood College-Chicago Loop; ELBERT, INC. a Colorado Corporation d/b/a Westwood College-DuPage; and EL NELL INC., a Colorado corporation d/b/a Westwood College-O'Hare Airport; Defendants.	)	No. 12CH01587

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DOROTHY BROWN CLERK

COMPLAINT FOR INJUNCTIVE AND OTHER RELIEF

NOW COMES the Plaintiff, THE PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, and brings this action against Defendant ALTA COLLEGES, INC. (hereinafter referred to as "ALTA") ; WESTWOOD COLLEGE, INC. (hereinafter referred to as "WESTWOOD"); WESGRAY CORPORATION (hereinafter referred to as "WESGRAY"); ELBERT, INC. (hereinafter referred to as "ELBERT"); and EL NELL, INC. (hereinafter referred to as "EL NELL"); for violations of the Consumer Fraud and Deceptive Practices Act, 815 ILCS 505/1, *et seq.*

NATURE OF THE CASE

1. Defendants operate for-profit schools in Illinois, including programs in the field of criminal justice. In the course of marketing and selling their criminal justice program to Illinois consumers, Defendants have made a variety of misrepresentations or false promises, including representations related to the value and transferability of its coursework and degrees that particularly impact students who enrolled in Defendants' Criminal Justice Program with the expectation that they would be able to pursue a law enforcement career with a Westwood nationally-accredited education.

2. Through deception, misrepresentations or false promises that started with online, TV and radio advertising, continued with oral promises of admissions representatives and financial aid officers, and were maintained during the course of the program via faculty, deans and a campus president, many Illinois students who tried to better themselves through a criminal justice education at Westwood now find themselves saddled with more than $50,000 in student loans, and no way to pursue a law enforcement job because their Westwood education was not regionally accredited and therefore was not recognized by other regionally accredited colleges or law enforcement employers, such as the Chicago Police Department, the Illinois State Police, and many suburban police departments.

3. More specifically, Defendants regularly promoted their Criminal Justice Program with television and radio advertisements depicting or presenting police officers – despite the fact that many police departments do not recognize Defendants' national accreditation, and as a result, very few graduates have ever become police officers in Illinois. Defendants even purchased search terms such as, "Become Police Officer in Chicago," "Chicago Police Requirements," "Join the Illinois State Police," and "Regionally Accredited Schools Chicago" in

order to present to prospective students their Internet ads and/or its website link as the top result in a Google, or other search engine result. Defendants' admissions representatives were trained to engage in zealous selling techniques to convince prospective students that Westwood was just the right fit for the student to pursue his/her career goals, and in many instances made misrepresentations or false promises regarding the value and accreditation of Westwood's criminal justice degrees. When enrolling prospective students expressed concern about financing, Defendants promised to assist the prospective students in obtaining part-time jobs to assist with paying for their degrees, but failed to follow through with that promise in any meaningful way. Defendants compounded these misrepresentations or false promises by misleading students about the magnitude of the financial burden associated with obtaining their degrees, engaging in a pattern and practice of downplaying the burdens of student loans they advised students to take out.

4. As alleged in more detail throughout this Complaint, Defendants' many misrepresentations or false promises to Illinois students and prospective students constitute violations of the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 505/2, and Plaintiff seeks to stop these violations and obtain meaningful redress for Illinois students impacted by these violations.

PUBLIC INTEREST

5. The Illinois Attorney General believes this action to be in the public interest of the citizens of the State of Illinois and brings this lawsuit pursuant to Section 7(a) of the Consumer Fraud Act, 815 ILCS 505/7(a).

JURISDICTION AND VENUE

6. This action is brought for and on behalf of the PEOPLE OF THE STATE OF

ILLINOIS, by LISA MADIGAN, ATTORNEY GENERAL OF THE STATE OF ILLINOIS, pursuant to the provisions of the Consumer Fraud and Deceptive Business Practices Act (hereinafter "Consumer Fraud Act"), 815 ILCS 505/1, *et seq.* and her common law authority as Attorney General to represent the People of the State of Illinois.

7. Venue for this action properly lies in Cook County, Illinois, pursuant to Sections 2-101 and 2-102(a) of the Illinois Code of Civil Procedure, 735 ILCS 5/2-101, 735 ILCS 5/2-102(a), because Defendants are doing business in Cook County, Illinois, and some transactions complained of herein occurred and continue to occur in Cook County, Illinois, and the surrounding counties.

PARTIES

8. Plaintiff, THE PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, the Attorney General of the State of Illinois is authorized to enforce the Consumer Fraud Act, 815 ILCS 505/7(a).

9. Defendant, ALTA, is the parent company of Defendant, WESTWOOD and is incorporated in the State of Delaware. Its principal place of business is 7604 Technology Way, Suite 400 in Denver, Colorado, which is in Denver County. Defendant, ALTA, owns and operates Defendant, WESTWOOD.

10. Although Defendant, ALTA, resides in Denver County, the acts at issue in this Complaint were conducted in the State of Illinois.

11. At all times relevant to this Complaint, Defendant, ALTA, formulated, directed, and controlled the acts and practices of Defendant, WESTWOOD, and its subsidiaries, employees and agents.

12. Defendant, ALTA, advertises its ownership of Defendant, WESTWOOD, at http://www.westwood.edu/why-westwood/about-us/.

13. Defendant, ALTA, owns the registered trademark,WESTWOOD, under which Defendants market and sell the educational services relevant to this case.

14. Defendant, ALTA, advertises the programs offered by Defendant, WESTWOOD, on internet search engines through an internet advertising campaign that specifically targets Illinois consumers searching the internet on computers located in Illinois.

15. Defendant, WESTWOOD, is a business operating in the State of Illinois and is incorporated in the State of Colorado. Its principal place of business is 7604 Technology Way, Suite 400 in Denver, Colorado, which is in Denver County.

16. Defendant, WESTWOOD, owns and operates separate corporations. The subsidiaries owned and operated by Defendant, WESTWOOD, include, but are not limited to, WESGRAY, ELBERT, and EL NELL.

17. Although Defendant, WESTWOOD, resides in Denver County, the acts at issue in this Complaint were conducted in the State of Illinois.

18 At all times relevant to this Complaint, Defendant, WESTWOOD, formulated, directed, and controlled the acts and practices of Defendants WESGRAY,ELBERT, and EL NELL; and their employees and agents.

19. Defendant, WESGRAY, is a business operating in the State of Illinois and is incorporated in the State of Colorado. Its principal place of business is 7604 Technology Way, Suite 400 in Denver, Colorado, which is in Denver County.

20. Defendant, WESGRAY, owns and operates two Westwood College branch locations: Westwood College – River Oaks campus, located at 80 River Oaks Center, Calumet

City, Illinois; and Westwood College – Loop campus, located at 1 North State Street, Chicago, Illinois.

21. Although Defendant, WESGRAY, resides in Denver County, the acts at issue in this Complaint were conducted in the State of Illinois.

22. Defendant, ELBERT, is a business operating in the State of Illinois and is incorporated in the State of Colorado. Its principal place of business is 7604 Technology Way, Suite 400 in Denver, Colorado, which is in Denver County.

23. Defendant, ELBERT, owns and operates one Westwood College main campus location: Westwood College – DuPage campus, located at 7155 James Avenue, Woodridge, Illinois.

24. Although Defendant, ELBERT, resides in Denver County, the acts at issue in this Complaint were conducted in the State of Illinois.

25. Defendant, EL NELL, is a business operating in the State of Illinois and is incorporated in the State of Colorado. Its principal place of business is 7604 Technology Way, Suite 400 in Denver, Colorado, which is in Denver County.

26. Defendant, EL NELL, owns and operates one Westwood College campus location: Westwood College – O'Hare campus, located at 8501 W. Higgins Road, Chicago, Illinois.

27. Although Defendant, EL NELL, resides in Denver County, the acts at issue in this Complaint were conducted in the State of Illinois.

28. For purposes of this Complaint for Injunctive and Other Relief, any references to the acts and practices of Defendants shall mean that such acts and practices are by and through the acts of Defendants, ALTA, WESTWOOD, WESGRAY, ELBERT, EL NELL, and their

collective officers, members, employees, representatives, or other agents and all persons or entities in active concert or participation with Defendants.

TRADE AND COMMERCE

29. Section 1(f) of the Consumer Fraud Act, 815 ILCS § 505/1(f), defines "trade" and "commerce" as follows:

> The terms 'trade' and 'commerce' mean the advertising, offering for sale, or distribution of any services and any property, tangible or intangible, real, personal, or mixed, and any other article, commodity, or thing of value wherever situated, and shall include any trade or commerce directly or indirectly affecting the people of this State.

30. Defendants were at all times relevant hereto, engaged in trade and commerce in the State of Illinois by advertising, offering for sale, and soliciting consumers to invest in educational courses and degree-granting programs with Defendants, including but not limited to, Defendants' Criminal Justice Program.

DEFENDANTS' UNFAIR OR DECEPTIVE BUSINESS PRACTICES

31. As described below, in the course of trade or commerce in the State of Illinois, Defendants have engaged in acts or practices that violate Illinois law. Defendants' conduct is ongoing and has the potential to impact any Illinois consumer who purchases Defendants' services.

32. Defendant, WESTWOOD, is a for-profit school that provides higher education to post-high school students.

33. As part of the institutional structure, Defendants sell services related to providing consumers with educational courses and the potential to obtain an associate's degree, a bachelor's degree, and/or a master's degree from Defendants.

34. At all relevant times, Defendants' School of Justice offered educational courses, an associate's degree, and a bachelor's degree in criminal justice.

35. The cost to attend Defendants' institution is more expensive than institutions such as community colleges or state universities which have traditionally served lower income students.

36. For example, in March 2007, the tuition for Defendants' three-year Bachelor's of Applied Science degree in criminal justice was $21,255 per year, or $63,765 total. In 2012, the tuition for Defendants' 2.8-year Bachelor's of Applied Science degree in criminal justice is $25,575 per year, or $71,610 total.

37. In comparison, the tuition for the 2011-2012 academic year to obtain a three-year Associates of Arts degree in criminal justice from the College of DuPage – which is regionally, as opposed to nationally, accredited and less than ten miles away from Defendants' DuPage campus – was $4,224 per year, or $12,672 total.

38. As alleged in greater detail below, Defendants' three-year Bachelor's of Applied Science degree in criminal justice costing over $60,000 total would not meet the minimum educational requirements for either the Chicago Police Department (for most if not all of the period relevant to this lawsuit) or the Illinois State Police.

39. In contrast, the College of DuPage's three-year Associates of Arts degree in criminal justice for $12,672 total would meet both the Chicago Police Department and the Illinois State Police minimum educational requirements.

40. In effect, Defendants charge a premium for a criminal justice degree that many times is worthless because the degree does not assist students with finding employment in law

enforcement, is not regionally accredited, and fails to adequately prepare students to secure employment that would enable them to repay their much larger federal and private student loans.

41. At all relevant times, Defendants solicited consumers through radio advertisements, radio spots, television commercials, magazine advertisements, newspaper advertisements, billboards, direct mailings to consumer's homes, school and job fair booths, online advertisements, and through their websites, including but not limited to, www.westwood.edu, and www.go.westwood.edu.

42. Defendants make available to potential students a Career Success Kit promoting Defendants' degree programs, including its Criminal Justice Program. (See Career Success Kit attached hereto as Exhibit 1.)

43. Defendants' Career Success Kit states the following, "Westwood is committed to giving you more than an accredited degree."

44. The statement, "Westwood is committed to giving you more than an accredited degree" contains an asterisk that references a small footnote stating, "Accredited by the Accrediting Council for Independent Colleges and Schools (ACICS) or Accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC)."

45. Defendants' Career Success Kit fails to mention that ACICS and ACCSC are national accrediting bodies, which are generally not as favored or accepted by law enforcement agencies as regional accrediting bodies.

46. Defendants' Career Success Kit also states the following:

> We take your success as seriously as you do. As a Westwood student, you'll be assigned a personalized group of Success Team members to support you from the day you enroll until after you've begun your career. Your Success Team is available to help you with any questions you may have along the way, including those regarding enrollment, student financing and academic support. We

> encourage you to use this team whenever you need—no question or concern is too big or too small.

47. Defendants' Career Success Kit further states the following about career opportunities:

> We're here to help you prepare for a career you'll love. Our Career Services department will guide you into your chosen field by helping you identify your career goals, build your resume and polish your interviewing skills. We'll also help connect you with top employers in your field. From the day you begin classes, to the day you begin your career, we'll help you prepare for success.

48. In many instances, Defendants do not connect Westwood students with "top employers" or any law enforcement employers.

49. In most instances, students who graduate with a criminal justice degree from Defendants' schools are not placed in positions within their chosen field of law enforcement.

50. In many instances, students who graduate with a criminal justice degree from Westwood and obtain employment are earning approximately minimum wage up to $10.50 per hour, or an average annual compensation of less than $22,000.

Misrepresentations about Defendants' Accreditation

Background and Defendants' Candidacy for Regional Accreditation

51. Accreditation is a voluntary system of peer review conducted by non-governmental accrediting bodies to determine and ensure uniform and quality education. Reputable accrediting associations are recognized by either the Council for Higher Education Accreditation (CHEA) or the U.S. Department of Education (DOE) as reliable authorities as to the quality of postsecondary education within the meaning of the Higher Education Act.

52. Institutional accreditors evaluate and accredit an entire educational institution. Institutional accreditation is provided by regional and national associations.

53. In general, regional accreditation is preferred by most employers and post-

secondary institutions over national accreditation. The industry standard is that regionally accredited schools usually will not accept or recognize credits from a nationally-accredited school.

54. There are six regional associations that are recognized as legitimate accrediting bodies by CHEA and DOE. The North Central Association, Higher Learning Commission (HLC), located in Chicago, Illinois, is the regional accreditation body that accredits degree-granting institutions of higher education in Illinois.

55. All four of Defendants' Illinois campuses are nationally accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).

56. Defendants have never achieved regional accreditation with HLC.

57. In 2004, Defendants sought affiliation with HLC through HLC's Candidacy Program.

58. HLC requires that all applicants hold candidacy status for at least two years. The candidacy period lasts for a maximum of four years.

59. During HLC's Candidacy Program, an institution seeking accreditation first undergoes a self-study process for initial candidacy to demonstrate that it meets HLC's Eligibility Requirements. The institution documents the degree to which it meets HLC's criteria for Accreditation, and submits a plan for its candidacy period. During the candidacy period, HLC sends Evaluation Teams to conduct comprehensive visits of the institution and submits its findings and recommendations to HLC's Board of Trustees, which is the decision-making body for all evaluations for initial candidacy and initial accreditation.

60. In November 2004, Defendants started HLC's candidacy Self Study process.

61. In March 2005, Defendants submitted its Preliminary Information Form to the

Higher Learning Commission, which is the first step in the process of obtaining initial accreditation status.[1]

62. In February 2006, HLC approved Defendants' Preliminary Information Form.

63. In March 2007, Defendants submitted their Self-Study Report to HLC in support of their application for accreditation.

64. On June 18, 2007, HLC's Evaluation Team visited Defendants' DuPage campus.

65. On June 18, 2007, HLC's Evaluation Team visited Defendants' Chicago Loop campus.

66. On September 24, 2007, HLC's Review Committee issued a report granting Defendants' candidacy application, but also noting that the "default rate for student loans is high and increasing" and that despite high levels of spending on recruiting, Westwood had "less than a 50% retention rate."

67. On September 26, 2007, HLC sent Defendants a letter indicating that Defendants met HLC's requirements for candidacy status per the Review Committee's report.

68. On October 12, 2007, HLC sent a letter to Defendants, confirming that HLC Board of Trustees ratified the Review Committee's recommendation that Defendants be granted candidacy status.

69. Thus, the earliest that Defendants could have possibly attained regional accreditation was October 2009.

70. From May 4, 2009 through June 10, 2009, HLC's evaluation team conducted comprehensive visits of Defendants' Illinois campuses for initial accreditation.

71. HLC's Evaluation Team issued a report summarizing the team's findings based

[1] An institution seeking initial status with HLC participates in the Eligibility Process, the goal of which is to determine whether the institution is sufficiently prepared for a team visit.

their on-site visits conducted during May and June 2009.

72. The Evaluation Team's report noted student complaints alleging Defendants' inadequate instruction, fraudulent handling of student financial aid, misrepresentations or false promises regarding Defendants' accreditation and students' ability to transfer Defendants' credits, and high cost of attendance. (See page 4 of HLC's Evaluation Report attached hereto as Exhibit 2.)

73. The Evaluation Team's report includes a recommendation that Defendants remain in candidacy status, stating that "the team recognizes that Westwood College has made significant progress toward becoming accredited, but it is also the team's judgment that the college would be best served to remain in candidate status while it deals with the numerous issues identified in this report."

74. On February 17, 2010, HLC's Board of Trustees issued a letter confirming its decision to continue Defendants' candidacy and attached a Statement of Affiliation Status which states Defendants were in candidacy for accreditation.

75. The February 17, 2010 letter also states that the year of Defendants' last comprehensive evaluation was 2008-2009, and that the year for its next comprehensive evaluation would be 2011-2012.

76. On August 4, 2010, the Government Accountability Office (GAO) testified before the Senate Health, Education, Labor and Pensions (HELP) identifying the results of its undercover investigation of 15 for-profit schools, including Defendants.

77. The GAO's testimony identified the following fraudulent and deceptive practices at Defendants' Texas campus: (1) admissions representatives failed to disclose graduation rate and the cost of the program; (2) admissions representative encouraged an applicant to change the

Free Application for Federal Student Aid (FAFSA) to add dependents falsely to qualify for grants in spite of the fact that the applicant notified the representatives that he had received a $250,000 inheritance and was able to pay the cost of the program.

78. On August 12, 2010, HLC sent Defendants a formal letter demanding that Defendants file with HLC a report responding to the GAO report findings as well as to HLC's candidacy requirements that institutions must provide accurate and complete information to potential students, comply with state and federal laws, and comply with the Higher Education Act.

79. HLC noted in its August 12, 2010 letter that prior to HLC's most recent evaluation visit, HLC had received complaints from students regarding Defendants' recruiting practices, issues with administration, and Defendants' financial aid process. Although HLC could not verify the complaints at the time of the visit, HLC noted the complaints "bear new significance in light of the GAO findings."

80. In response to the August 12, 2010 HLC letter, Defendants submitted a letter on September 1, 2010 stating that Defendants continued to meet HLC eligibility requirements.

81. On August 26, 2010, The Texas Workforce Commission (TWC) sent each of Defendants' campuses operating in Texas a notice to revoke TWC's Certificate of Approval to operate in Texas.

82. On September 1, 2010, one of Defendants' national accreditors at the time, the Accrediting Commission of Career Schools and Colleges (ACCSC), placed Defendants' Denver North Campus on probation status in response to Defendants' application for accreditation renewal.

83. On September 16, 2010, the Wisconsin Educational Approval Board (EAB) for its

online division sent Defendants a letter ordering them to cease enrolling Wisconsin residents because Defendants were not approved by the EAB.

84. On October 5, 2010, in response to the possible revocation of TWC's Certificate of Approval, the Wisconsin EAB's cease and desist order, and ACCSC's probation order, HLC sent Defendants a letter requesting that Defendants submit a report identifying the following: (1) the degree-granting status of all of Defendants' campuses; (2) Defendant's status with all accrediting agencies; (3) standing with each state; (4) investigative reports from any state; and (5) any lawsuits filed against Defendants. (See HLC October 5, 2010 letter attached hereto as Exhibit 3.)

85. On November 1, 2010, Defendants provided HLC a report in response to HLC's October 5, 2010 letter regarding Defendants' status with accreditors and state regulatory authorities.

86. On November 1, 2010, Defendants withdrew their candidacy application with HLC. (See withdrawal letter attached hereto as Exhibit 4.)

87. On November 6, 2010, HLC sent Defendants a letter accepting Defendants' withdrawal. (See HLC's response letter attached hereto as Exhibit 5.)

88. On November 6, 2010, HLC issued the following Public Disclosure Notice regarding Defendants' accreditation status:

> The Commission granted candidacy status to Westwood College in 2007. The Commission conducted an evaluation of Westwood College for initial accreditation beginning with a team visit in May 2009. That evaluation process determined that Westwood did not yet meet the Criteria for Accreditation, but that it did continue to meet the requirements for continued candidacy. Westwood College was granted continued candidacy in February 2010. On November 1, 2010, Westwood College voluntarily withdrew from affiliation with the Commission.

<u>Misrepresentations about Regional Accreditation</u>

89. During students' initial admission process, potential students met with Defendants' admissions representatives to take a tour of one of Defendants' campuses, take a placement exam, and complete enrollment paperwork.

90. Many prospective students also discussed their career goals and motivations for considering Westwood with their admissions representatives.

91. During many of these discussions, the admissions representatives attempted to persuade prospective students to enroll in Westwood by making misrepresentations or false promises about Defendants' accreditation status.

92. In some instances, admissions representatives told prospective students that Defendants were both nationally and regionally accredited.

93. In some instances, admissions representatives told prospective students that Defendants were accredited, without disclosing the difference between national and regional accreditation or its significance.

94. In some instances, admissions representatives told prospective students that Defendants were in the process of becoming regionally accredited and would attain regional accreditation by a date certain.

95. Many prospective students specifically asked admissions representatives whether they would be able to obtain a master's or law degree after completing a Westwood bachelor's degree program.

96. In response, admissions representatives typically assured these students that they would be able to pursue higher degrees based on their Westwood bachelor's degree when, in fact, they could not pursue a master's or law degree at most Illinois institutions based on their Westwood bachelor's degree.

97. Many prospective students specifically asked admissions representatives about their credit transferability options in case they needed to transfer to another college or university.

98. In response, admissions representatives typically assured these consumers that they could transfer to any school without fully explaining how the transfer process works.

99. Once students were officially enrolled in Defendants' classes, many continued to ask Defendants' instructors and administration about Defendants' accreditation.

100. Defendants' faculty and representatives made assurances to students regarding regional accreditation after students expressed concern about accreditation and threatened to withdraw from Defendants' classes.

101. In some instances, Defendants falsely represented to students that Defendants would obtain regional accreditation by a date certain.

102. In some instances, Defendants falsely represented to students that, upon graduation, students would be "grandfathered in" and considered to have a regionally accredited degree once Defendants had attained regional accreditation.

103. In some instances, Defendants discouraged students from asking questions regarding accreditation and threatened students with suspension or expulsion if students did not comply.

104. Between 2005 and 2008, rumors circulated at Defendants' DuPage campus regarding accreditation. Specifically, former Westwood students informed students that other colleges would not accept Westwood credits.

105. In or about 2008, Defendants' DuPage campus President, Kelly Moore, made several classroom visits for the purpose of addressing accreditation rumors.

106. During these classroom visits, Ms. Moore assured students that Defendants would

be regionally accredited within two to three years and that students must stop discussing the issue, and that students who continued to discuss accreditation risked suspension or expulsion.

107. A consumer who enrolled at Defendants' DuPage in October 2007 was told during the admissions process that Westwood would be regionally accredited "next year." During her time at the school, this student also heard Ms. Moore represent that Defendants would be regionally accredited "in a few months."

108. In 2009, Ms. Moore and several other instructors and administrators went to different classrooms to inform students that Defendants were in candidacy to be regionally accredited and should be regionally accredited by the end of 2009.

109. When students expressed concern regarding accreditation, Ms. Moore repeated her assertion that Defendants would be accredited by the end of 2009.

110. Ms. Moore also stated that if Defendants became regionally accredited after students had graduated, students could come back, take another course, and receive a new regionally accredited diploma.

111. Ms. Moore held a student assembly in 2008 and told students that Defendants would be regionally accredited by the time the students graduated.

112. Between 2005 and 2007, rumors circulated at Defendants' Chicago Loop campus regarding accreditation. Specifically, former Westwood students informed students that other colleges would not accept Westwood credits, and that the Chicago Police Department was not hiring Westwood graduates because Westwood was not regionally accredited.

113. In or about 2007, students at Defendants' Chicago Loop campus routinely asked instructors and administration about Defendants' accreditation. In response, Defendants' agents, including, but not limited to, Defendants' Chicago Loop campus Academic Dean, Dillon

Rasmussen, assured students that Defendants would be regionally accredited by the time they graduated.

114. In some instances, Defendants' agents, including, but not limited to, Mr. Rasmussen, told students that if they graduated before Defendants obtained regional accreditation, their diplomas would be "that much more valuable to employers" and that no employers would check the students' graduation date.

115. In at least one instance, Mr. Rasmussen told students that Defendants were in the process of obtaining regional accreditation and that even those who had graduated before Westwood became accredited would be "grandfathered in" and their "degrees would be worth the same" as students who had graduated after Defendants became accredited.

116. The practice of Defendants making misrepresentations or false promises regarding their accreditation status including the time by which Defendants would attain regional accreditation prevented students from withdrawing from Defendants' classes and saving themselves the costs of Defendants' regionally unaccredited degree.

Misrepresentations that Westwood's Criminal Justice Program Qualifies Students for a Career in Law Enforcement

117. Defendants advertised that students who graduate with an associate's degree or bachelor's degree in criminal justice would be eligible to obtain positions within the criminal justice field, including, but not limited to, corrections officers, children's advocates, youth care counselors, police officers, federal agents, crime scene investigators, forensic scientists, and coroners.

118. Defendants solicited consumers to enroll in Defendants' Criminal Justice Program through direct e-mail marketing.

119. These direct e-mail solicitations advertised the Westwood College School of Justice as a place to prepare for a career as a law enforcement officer, even though many police departments would not recognize a Westwood criminal justice degree.

120. In many instances, prospective students interested in Westwood's Criminal Justice Program learned about the program through television advertisements, which represented that Defendants' Criminal Justice Program would prepare consumers for "exciting criminal justice career opportunities in law enforcement, investigation, corrections, probation, advocacy, and more."

121. For example, one of Defendants' advertisements promoting their Criminal Justice Program states as follows:

> Passionate about justice? A degree in criminal justice from Westwood College is your key to a rewarding career. High paying jobs in criminal justice are growing faster than average with exciting job opportunities; like law enforcement officer, legal investigator, youth probation officer, and more.
> Call now for Westwood's free career success kit with the latest criminal justice salary information.
> Westwood provides all the tools you need to get your career going fast.
> Faculty with real-world experience. . .
> Hands-on training. . .
> Field demonstrations in the classroom. . .
> Plus, a bachelor's degree in only three years, so you can make a difference sooner. . .
> Westwood College; a place where you can succeed.
> Call now for Westwood's free career success kit.

122. Another advertisement promoting Defendants' Criminal Justice Program states as follows:

> I always wanted a career serving others but this (dish washer pictured) wasn't what I had in mind.
> Then I decided to give Westwood College a call. With a degree in criminal justice, there are tons of opportunities to really make a difference, like being a youth care counselor, a law enforcement officer, or a children's advocate.

> With my degree from Westwood, I went from this (dish washer pictured) to this (woman in suit with child pictured).
> So call Westwood now and start your career.
> Get your bachelor's degree from Westwood in just three years. Start today with your free career success kit.

123. Many of Defendants' television advertisements for the Criminal Justice Program also contained repeated dramatic images of police officers investigating crime scenes and apprehending criminals.

124. Prospective Westwood criminal justice students frequently informed Defendants of their desire to become Chicago Police Officers, Illinois State Police Officers, and Juvenile and Adult Probation Officers.

125. With intent that students rely, Defendants failed to inform prospective and current students in the Criminal Justice Program that they would be thwarted from obtaining many types of employment in law enforcement because Defendants' Criminal Justice Program does not have regional accreditation.

126. The Chicago Police Department set the following minimum educational requirements for persons applying for a Police Officer position during the November 2003 hiring cycle:

> Applicants must have at least 60 semester (or 90 quarter) hours of credit, prior to January 31, 2004, from a college or university **accredited by one of the six regional accrediting bodies** responsible for evaluating two and four year institutions that grant Associate's and Bachelor's degrees. Colleges and universities in Illinois are accredited by the North Central Association of Colleges and Schools. Also acceptable are applicants who have completed four years of continuous active duty in the armed forces of the United States. .

(See Chicago Police Department 2003 Job Update press release attached hereto as Exhibit 6) (emphasis added).)

127. The Chicago Police Department set the following minimum educational requirements for persons applying for a Police Officer position during the June 2006 hiring cycle:

> Applicants must have at least 60 semester (or 90 quarter) hours of credit, prior to August 31, 2006, from a college or university **accredited by one of the six regional accrediting bodies** responsible for evaluating two and four year institutions that grant Associate's and Bachelor's degrees. Colleges and universities in Illinois are accredited by the North Central Association of Colleges and Schools. Also acceptable are applicants who have completed four years of continuous active duty in the armed forces of the United States, or applicants who have completed 30 semester (or 45 quarter hours from a college or university accredited by **one of the six regional accrediting bodies** responsible for evaluating two and four year institutions that grant Associate's and Bachelor's degrees and one year of continuous active duty in the armed forces of the United States . . .

(See 2006 City of Chicago Police Officer Examination Announcement attached hereto as Exhibit 7) (emphasis added).)

128. The Illinois State Police Merit Board has set the following minimum educational requirements for persons applying for an Illinois State Trooper position as of May 2010:

> **Option 1)** An Associate of Arts Degree or equivalent course work* AND meet one of the following two job experience requirements: 3 consecutive years of continuous, full time service, as a police officer, with the same police agency OR three consecutive years of active military duty.
> **Option 2)** An Associate of Science Degree or equivalent course work* AND meet one of the following two job experience requirements: 3 consecutive years of continuous, full time service, as a police officer, with the same police agency OR three consecutive years of active military duty.
> **Option 3)** An Associate of Applied Science Degree, ONLY if the degree is in Law Enforcement/Criminal Justice AND meet one of the following two job experience requirements: 3 consecutive years of continuous, full time service, as a police officer, with the same police agency OR three consecutive years of active military duty.
> **Option 4)** A Bachelor's Degree
> *Please note: the college or university must be accredited by one of the following associations:
>
> Middle States Association of Colleges and Schools
> North Central Association of Colleges and Schools
> New England Association of Schools and Colleges
> Northwest Association of Schools and Colleges
> Southern Association of Colleges and Schools
> Western Association of Schools and College

(See Illinois State Merit Board Pre-Employment Requirements attached hereto as Exhibit 8.)

129. As alleged in greater detail above, HLC, which is the North Central Association of Colleges and Schools, Higher Learning Commission, and is located in Chicago, Illinois, is the regional accreditation body that accredits degree-granting institutions of higher education in Illinois.

130. Defendants withdrew their candidacy application for accreditation by HLC on November 1, 2010, and were at no point prior to that accredited by HLC or any regional accreditation body.

131. Thus, degrees conferred by Defendants did not meet the minimum educational requirements posted for employment as a police officer with the Chicago Police Department in November 2003 and June 2006.

132. Additionally, degrees conferred by Defendants do not meet the minimum educational requirements for persons applying for an Illinois State Trooper position at anytime.

133. To justify their misrepresentations or false promises about employment with these institutions, Defendants have told former and current Westwood students a number of different stories, all designed to ensure that students did not drop out of Defendants' Criminal Justice Program.

134. One such misrepresentation or false promise was that although students might not be able to get a job as a Chicago police officer, they could get a job as a suburban police officer and then easily transfer to the Chicago Police Department.

135. In fact, the Chicago Police Department's *Police Department Career Information* website specifically states that the Chicago Police Department does not accept lateral transfers from other jurisdictions. See Chicago Police Frequently Asked Questions at:

https://portal.chicagopolice.org/portal/page/portal/ChicagoPolice/GET_INFORMED/InsideCPD/JoinTeamCPD/CPDCareerFAQ.

136. In April 2009, Defendants held at least three town hall-style meetings at Defendants' Chicago Loop campus to address student concerns that the Chicago Police Department only hired graduates from regionally accredited schools. (See email attached as Exhibit 9.)

137. During this meeting, Defendants' Chicago Loop campus Academic Dean, Dillon Rasmussen, explained to students that because Defendants were not regionally accredited, they could not become Chicago police officers.

138. Many students responded that their admissions representatives had lied to them by telling them that Defendants were "fully accredited" and that the students could become Chicago police officers and their credits would transfer to other institutions.

139. Mr. Rasmussen acknowledged that Defendants' admissions representatives had misled the students by apologizing for the admissions representatives' actions.

140. But even after acknowledging that the students had been misled, Mr. Rasmussen advised disappointed students to withdraw from Westwood.

Misrepresentations about Consumers' Criminal Backgrounds

141 In some instances, Defendants failed to inform prospective and current students in the Criminal Justice Program who have criminal records that they would not be able to obtain, or would have a difficult time obtaining, employment in the law enforcement field due to their criminal backgrounds.

142. In some instances, prospective students with criminal backgrounds asked Defendants' admissions representatives whether or not their criminal backgrounds would be a problem because they wanted to attend Westwood in order to become police officers.

143. In some instances, Defendants' admissions representatives told prospective students interested in becoming police officers not to be concerned about their criminal backgrounds.

144. In some instances, Defendants' admissions representatives told prospective students with criminal backgrounds who were interested in becoming police officers not to worry, because their records could be expunged.

145. Defendants' admissions representatives did not refer prospective students to seek the advice of legal counsel concerning expungement.

146. Defendants' admissions representatives did not tell prospective students that a criminal background would in fact almost certainly prevent them from becoming police officers in many cities, counties, and states after graduating with a degree from Defendants' Criminal Justice Program.

147. Once students with criminal backgrounds enrolled in Defendants' Criminal Justice Program, they began learning from classmates and Westwood graduates that many police departments, including the Chicago Police Department and the Illinois State Police, would not hire anyone with a criminal background

148. In many instances, those students then asked Criminal Justice faculty members and administrators, including DuPage campus President, Kelly Moore, whether their criminal backgrounds would in fact be a problem despite what they had been told by Westwood's admissions representatives.

149. Defendants, including Ms. Moore, assured these students that they could secure jobs in the criminal justice field despite having criminal backgrounds.

150. Many Westwood Criminal Justice students decided to remain in Westwood's Criminal Justice Program after hearing these reassurances from Westwood's faculty members and administrators.

Misrepresentations about Student Financing

151. During the enrollment process, Defendants took advantage of students' lack of experience with the financial aid process by downplaying the financial burden associated with attending Defendants' programs.

152. Once the admissions representative persuaded a prospective student to enroll, the admissions representative then arranged a meeting with a financial aid officer so that the prospective student could apply for federal grants, federal loans, and private loans to cover the cost of attendance.

153. Training materials that Defendants provided to their admissions representatives instructed the admissions representatives how to "close" when discussing tuition and financial aid. (See "The Art of Closing Without Closing" attached hereto as Exhibit 10; "Psychology of the Phone Script and Seven-Step Interview" attached hereto as Exhibit 11.)

154. The training materials recommended that admissions representatives explaining the financial aid process should "[i]ncrease energy and enthusiasm – Financial Aid is Easy and Affordable." (See Exhibit 11.)

155. According to the training materials, admissions representatives were to finish the financial aid discussion by asking: "Do you see that Westwood can help make this [the cost of

Defendants' programs] affordable and obtainable financially through our financial aid process?" (See Exhibit 10).

156. In practice, Defendants' admissions representatives filled out a "Student Budget" with prospective students describing in part how the prospective student could manage his or her monthly expenses. (See "Student Budget" attached hereto as Exhibit 12.)

157. According to the student budget sheet, Defendants' commitment to the prospective student included assistance obtaining part time employment.

158. Admissions representatives also told prospective students that Defendants' career services office would assist them in securing employment related to their field of study while attending Defendants' Criminal Justice Program.

159. When filling out the student budget with a prospective student, the admissions representative juxtaposed the prospective student's estimated monthly contribution toward his or her "Educational Investment" with the approximate wages a prospective student could expect to earn from a part time job.

160. For example, if a prospective student was told that his or her estimated monthly contribution towards the cost of Defendants' program would be $190.00, that figure would be compared to the $700.00 to $960.00 per month the student was told he or she could expect to earn working a part-time job.

161. Thus, Defendants led prospective students to believe that Defendants were committed to helping students acquire part-time jobs related to the criminal justice field that would become a significant component of the prospective students' budget.

162. However, once a prospective student enrolled, Defendants merely sent the students job postings cut and pasted from job placement websites such as Monster.com and CareerBuilder.com.

163. The job postings sent to students rarely, if ever, related to their criminal justice field of study.

164. Defendants additionally made misrepresentations or false promises to students and prospective students regarding the nature of the students' financing options.

165. Defendants' training materials instructed admissions representatives to discuss four payment options with prospective students: grants, government loans, private loans and Defendants' APEX financing program. (See Exhibit 10.)

166. The training materials described grants as "[g]ravy money."

167. The training materials described government loans as "deferred payments."

168. The training materials described private loans as having "MANY options" (capitalization in original).

169. In cases where federal and private loans were not enough to cover the full cost of attendance, Defendants encouraged students to use Defendants' APEX financing program.

170. Under Defendants' APEX financing program, Defendants effectively allowed a student's outstanding balance not covered by other sources of federal aid or private loans to accumulate without interest while the student was enrolled in their program.

171. Defendants' training materials described Defendants' APEX financing program as the "[o]nly option you HAVE to pay back monthly while in school" (capitalization in original).

172. During the time that they were enrolled in Defendants' Criminal Justice Program, students paid a defined amount – normally about $150.00 per month – toward the accruing balance.

173. The students paid their defined amount directly to Defendants' financial aid office.

174. When a student graduated or withdrew from Defendants' program, the remaining balance financed was transferred to UNISA, Inc., a loan servicing company that predominantly serves institutions of higher education.

175. Ninety days after the student graduated or withdrew from Defendants' program, interest rates as high as eighteen percent (18%) began to accrue on any unpaid balance financed through Defendants' APEX financing program.

176. When a student graduated, Defendants encouraged the student to refinance the balance to obtain a lower interest rate – essentially encouraging the student to take yet another loan to guarantee that Defendants were paid in full.

177. If a student failed to refinance the balance and subsequently defaulted on his or her payments, the outstanding amount was transferred back to Defendants, who sent it to collection.

178. Defendants claim that the high interest rates on APEX financing are designed to "ensure that students have exhausted all other financing options first."

179. However, in some instances, Defendants convinced students to enroll in Defendants' APEX financing program by telling them that it would reduce the amount of private loans they needed to secure.

180. At least one student – Paul Lindsay – was led to believe that his monthly payments of $110.00 in connection with Defendants' APEX financing program were being applied to his private loans through Sallie Mae.

181. Some students and prospective students were advised only of their monthly APEX payment amount without being told that they would ultimately be responsible for any remaining APEX balance.

182. In other words, Defendants led some students and prospective students to believe that if they made all of their monthly APEX payments while earning a degree, they would have paid off their APEX financing by the time they graduated.

183. Upon finishing or leaving the Defendants' program, the students would later discover that they were responsible for additional APEX financing amounts accruing interest at eighteen percent (18%).

184. In some instances, Defendants refused to release students' transcripts until the remaining balance from the APEX financing program was paid in full.

185. One student who paid $50.00 per month in connection with Defendants' APEX financing program – Ernca Todorov – discovered after graduating that she owed $1,800.00 towards the remaining balance.

186. The $1,800.00 owed by that student is currently in collection.

187. Another student who never signed up to participate in Defendants' APEX financing program – Megan Hansen – was told after graduating that she owed a balance of $879.00 after graduating.

188. When Ms. Hansen contacted Defendants about the amount owed, Defendants were unable to explain how she became enrolled in the APEX financing program.

189. Yet another student – Nicole Rivera – was told that she would have to pay between $150.00 and $200.00 per month in connection with Defendants' APEX financing program.

190. Upon graduating, Ms. Rivera learned that she owed an extra $5,000.00 in addition to the monthly payments she had been making.

191. Defendants further failed to provide specific information concerning the total costs and fees chargeable to a prospective student for the degree Defendants offered.

192. For example, Defendants provided prospective criminal justice applicants with varying estimates for the total cost of their Criminal Justice Program.

193. These estimates generally ranged between $50,000.00 and $60,000.00.

194. After approximating the total cost of the program to a given student, Defendants then made misrepresentations or false promises to the student that he or she qualified for financial aid to cover the full amount at the time he or she enrolled.

195. In some instances, Defendants' financial aid officers told students that they qualified for loans in the full amount of the cost approximated to the students, but then encouraged the students to take additional loans "just in case."

196. One student – Malissa Peloquin – was told that the cost of her criminal justice degree would be about $56,000.00.

197. Defendants' financial aid officer then told Ms. Peloquin that she was approved for federal financial aid to cover the full cost of her degree.

198. However, the financial aid officer additionally recommended that Ms. Peloquin apply for a separate $10,000.00 private loan to cover additional unexpected expenses "just in case."

199. Because the financial aid officer referred to the separate $10,000.00 private loan as a "just in case" loan, Ms. Peloquin believed it would be returned if not used.

200. Throughout Ms. Peloquin's time enrolled in Defendants' program, Defendants' financial aid office convinced the student to take out two additional $10,000.00 "just in case" loans.

201. After graduating and upon entering repayment of her loans, Ms. Peloquin expected to owe slightly more than $56,000.00.

202. Defendants had told Ms. Peloquin that the entire cost of the program was $56,000.00, and during Ms. Peloquin's time enrolled in the program, tuition had increased on only one occasion.

203. Ms. Peloquin believed that she had taken out one $56,000.00 loan and three $10,000.00 "just in case" loans – one $10,000.00 "just in case" loan at the beginning of each year.

204. Ms. Peloquin further believed – based on Defendants' characterization of the loans as "just in case" – that the majority of the three $10,000.00 loans had been returned to her lender as unused.

205. Ms. Peloquin believed that a portion of the "just in case" loans would be applied to the tuition increase and the remainder returned to the lender.

206. However, upon graduating and entering repayment, Ms. Peloquin discovered that she actually owed just under $77,000.00 for multiple loans with interest rates ranging from 2.9% to 11.9%.

207. Ms. Peloquin also learned that no portion of the three $10,000.00 "just in case" loans had been returned to any of her lenders, that she could not return any of the $10,000.00

"just in case" loans at that time, and that her monthly payments toward her student debt would be $598.00 per month for twenty-five years.

208. The training materials that Defendants provided to their admissions representatives instructed the admissions representatives to stress that "EVERYTHING is charged to a student account" (capitalization in original), and that financial aid assists with paying the student account.

209. In other words, Defendants instructed admissions representatives to tell students that the cost of their education would be charged to a student account, and that their financial aid would then be applied to that account.

210. Defendants' financial aid officers then led the students to believe that they had taken one lump sum loan, which was applied to that student account.

211. These misrepresentations or false promises discouraged students from leaving Defendants' programs by causing the students to believe that they have no alternative but to finish the program that they have already taken a lump sum loan to pay for – as opposed to leaving the program and ceasing to incur additional debt.

212. Defendants further compounded their misrepresentations or false promises regarding financial aid by failing to provide students with written information regarding the balance of their student accounts and the loans they had received unless the students specifically asked for it.

213. In at least one instance, even when a student – Annete Arkema – asked for documentation concerning her student loans, Defendants' financial aid office simply promised to mail the documents to her without ever following through on that promise.

214. Defendants engaged in high pressure tactics designed to induce students to obtain additional loans while enrolled in Defendants' programs.

215. In many instances, students were pulled out of class and told that they would need to take additional loans to remain enrolled in Defendants' programs.

216. Many times, students were told that they could not return to class until they filled out the necessary paperwork to obtain additional loans.

217. At least one student – Paul Lindsay – described Defendants' actions as a "shakedown."

False and Deceptive Internet Advertising

218 Defendant, ALTA, also engaged in a pattern and practice of manipulating the manner in which information about their programs is presented on the internet.

219. Defendant, ALTA, employs an internet advertising agency to maximize the internet exposure of their programs in defined geographic regions, including Illinois.

220. Defendant, ALTA's internet advertising campaign specifically targets geographic regions where Defendants maintain ground campuses, including Illinois.

221. In fact, Defendant, ALTA's internet advertising campaign is specifically designed to reach consumers using the internet on computers located in, among other states, Illinois.

222. One of the goals of Defendant, ALTA's internet advertising campaign is to ensure that the websites advertising Defendants' programs appear first or near first on the list of results when certain search terms are entered into internet search engines such as Google, Bing, or Yahoo.

223. This process is known as search engine optimization.

224. Through its internet advertising agency, Defendant, ALTA, also bids on certain internet search terms that prompt advertisements for the school when consumers search internet search engines using specified search terms at certain times and in certain geographic regions, including Illinois.

225. Thus, when an Illinois consumer enters pre-defined search terms into an internet search engine from a computer located in Chicago, Illinois, Defendant, ALTA's internet marketing campaign either (1) optimizes the likelihood that a website advertising their programs will appear first or close to first on the search results list; (2) prompts an internet advertisement for Defendants' programs; or (3) both.

226. Defendant, ALTA, has engaged in these practices of optimizing and bidding on search terms without regard for their capacity to mislead or confuse Illinois consumers.

227. For example, one of the search terms that Defendant, ALTA, used during relevant times was "Regionally Accredited College List Illinois."

228. Thus, if an Illinois consumer was looking for a list of regionally accredited colleges in Illinois and entered the search term "Regionally Accredited College List Illinois" into a search engine from a computer located in Illinois, Defendant, ALTA's campaign was designed to either (1) optimize the likelihood that a website advertising Defendants' programs would appear first or near to first in the search results list; (2) prompt an internet advertisement for Defendants' programs; or (3) both.

229. Defendants' schools were never regionally accredited institutions.

230. Engaging in practices designed to advertise Defendants' programs to consumers who are looking for regionally accredited colleges when Defendants' schools are not regionally accredited has the capacity to, and tends to, mislead and confuse consumers.

231. Other similarly used search terms relating to accreditation include:

a. Regionally Accredited Schools Illinois;

b. Regionally Accredited College Illinois;

c. Regionally Accredited Schools Chicago;

d. Regionally Accredited Colleges List;

e. List of Regionally Accredited Schools;

f. Regionally Accredited Colleges; and

g. Regionally Accredited Online Schools.

232. The appearance of a link to a website advertising Defendants' programs on a list of results obtained by entering these search terms has the capacity to, and tends to, mislead and confuse consumers.

233. As recently as January 12, 2012, typing the search term "List of Regionally Accredited Colleges in Illinois" into the search engine Google from a computer located in Chicago, Illinois yielded an advertisement for Defendants stating: "Westwood College Illinois . . . New Employment Pledge! Start a New Career. Learn More." (See advertisement attached hereto as Exhibit 13.)

234. The advertisement was based on the input search term.

235. The advertisement included a link that would redirect a consumer who clicked on it to Defendants' internet landing page located at www.westwood.edu/Chicago.

236. In addition, employers such as the Chicago Police Department, the Illinois State Police, and the Federal Bureau of Investigations will not recognize, or have not recognized during relevant time periods, Defendants' degrees and credits in connection with becoming a Chicago police officer, an Illinois State Trooper, or an F.B.I. Special Agent.

237. Yet Defendant, ALTA, used during relevant times search terms such as the following to either (1) optimize the likelihood that a website advertising their programs would appear first or near to first in the search results list; (2) prompt an internet advertisement for Defendants' programs; or (3) both:

h. Become a Police Officer in Chicago;

i. Chicago Police Academy;

j. Chicago Police Requirements;

k. Join the Illinois State Police;

l. State Trooper College;

m. State Trooper Degrees;

n. How to Become FBI Agent in Illinois;

o. Requirements FBI Special Agent;

p. FBI College;

q. FBI Training.

238. The appearance of a link to a website advertising Defendants' programs on a list of results obtained by entering these search terms, or the prompting of an advertisement for Defendants' programs by entering these search terms, has the capacity to mislead and confuse consumers.

239. As recently as January 12, 2012, typing the search term "Requirements for Illinois State Police" into the search engine Google from a computer located in Chicago, Illinois yielded an advertisement for Defendants stating: "Police requirements Illinois . . . 3 Year Degree, 4 Chicago Locations. Get Criminal Justice Program Info." (See advertisement attached hereto as Exhibit 14.)

240. The advertisement was based on the input search term.

241. The advertisement included a link that would redirect a consumer who clicked on it to Defendants' internet landing page located at www.westwood.edu/Degree.

242. Similarly, the advertisements prompted by searching terms such as these have the capacity to mislead or confuse consumers.

243. For example, one Westwood advertisement distributed by Defendant, ALTA, on the Yahoo and Bing search engines in 2009 stated "Guide to Chicago Police Careers. Earn a Criminal Justice Degree."

244. When a consumer clicked on the advertisement, he or she would subsequently be redirected to an internet landing page for the Defendants' Criminal Justice Program at Westwood.

245. In 2009, the Chicago Police Department did not recognize Westwood degrees or credits in connection with becoming a police officer in Chicago.

246. Defendant, ALTA's pattern and practice of manipulating the manner in which information about the school is presented on the internet without regard for whether the information presented has the capacity to mislead or confuse consumers constitutes false and deceptive advertising.

Misrepresentations Made by Westwood Administration

Kelly Moore

247. From 2001 to 2002, Kelly Moore was the Assistant Executive Director of Education of Defendants 'DuPage campus.

248. From 2002 to 2003, Ms. Moore was the Executive Director of Education of Defendant's DuPage campus.

249. From 2003 to present, Ms. Moore has served as the President of Defendants', DuPage campus.

250. DuPage campus President, Kelly Moore, acted as Defendants' agent by interviewing and hiring employees and conducting faculty meetings at least once per term, which included reviewing recruitment numbers, reviewing student evaluations, and identifying campus goals and student issues.

251. Ms. Moore participated in Defendants' deceptive practices by:

a. Informing students of Defendants' DuPage campus that they could easily obtain employment in law enforcement despite having criminal backgrounds;

b. Informing students that Defendants would be regionally accredited by the Higher Learning Commission (HLC) within "months", "shortly", or by a certain date;

c. Holding a campus-wide student assembly in 2008 to address accreditation where she told students that Defendants would be regionally accredited by the time the students were scheduled to graduate;

d. Assuring students that when Defendants obtained regional accreditation, all students who had graduated from WESTWOOD could return to WESTWOOD, take an additional class, and have their transcript "stamped" as regionally accredited;

e. Informing students that a nationally accredited degree from Defendant, WESTWOOD, was superior to a degree from a regionally accredited institution because students could obtain employment anywhere in the nation with a nationally accredited degree; and

f. Threatening students that unless students refrained from discussing Defendant, WESTWOOD's accreditation they would be subject to certain consequences, specifically "expulsion" from WESTWOOD.

Dillon Rasmussen

252. From May 2004 to approximately September 2004, Dillon Rasmussen was an adjunct faculty member of Defendants' Chicago Loop Criminal Justice Program.

253. From approximately October 2004 to February 2006, Mr. Rasmussen was the Program Chair of Defendants' Chicago Loop Criminal Justice Program.

254. From February 2006 to the present, Mr. Rasmussen has served as the Academic Dean for Defendants' Chicago Loop campus.

255. Chicago Loop campus Academic Dean Rasmussen acted as Defendants' agent by:

a. Meeting with students enrolled in Defendant, WESTWOOD's Chicago Loop Criminal Justice Program during regularly scheduled office hours and discussing, among other things, transferability of credits, Defendant WESTWOOD's accreditation status, and students' career goals, including the career goals of students who wanted to become police officers;

b. Hiring, evaluating and retaining faculty for Defendant, WESTWOOD's Chicago Loop Criminal Justice Program;

c. Establishing policies for faculty evaluation and retention for Defendant WESTWOOD's Chicago Loop Criminal Justice Program;

d. Addressing complaints from students enrolled in Defendant WESTWOOD's Chicago Loop Criminal Justice Program, including, among other things, complaints from students who had heard that graduates of Defendant

WESTWOOD's Chicago Loop Criminal Justice Program were not eligible to become police officers with the Chicago Police Department;

e. Discussing Defendant, WESTWOOD's accreditation status with graduates of Defendant, WESTWOOD's Chicago Loop Criminal Justice Program;

f. Serving as co-chair for Defendant WESTWOOD's Chicago Loop campus self-study process, a component of Defendant WESTWOOD's application for regional accreditation with the Higher Learning Commission ("HLC"); and

g. Answering questions from students enrolled in Defendant WESTWOOD's Chicago Loop Criminal Justice Program at campus-wide meetings, including among other things, questions regarding Defendant WESTWOOD's accreditation status and questions regarding whether the Chicago Police Department would accept Defendant, WESTWOOD's degree.

256. Mr. Rasmussen participated in Defendants' deceptive practices by:

a. Informing students of Defendants' Chicago Loop Criminal Justice Program that Defendants would receive regional accreditation by a certain date or that the regional accreditation process was not a lengthy one;

b. Informing students of Defendants' Chicago Loop Criminal Justice Program that when Defendants became accredited, students who had already graduated would have their degrees "grandfathered in" and their degrees from Defendant, WESTWOOD, would automatically become regionally accredited degrees;

c. Instructing faculty members at Defendants' Chicago Loop Criminal Justice Program to tell students that if students graduated before Defendants

became regionally accredited, once Defendants achieved regional accreditation, the degrees of those students would qualify as regionally accredited degrees because no one would check the date Defendants attained regional accreditation; and

d. Informing students in 2010 that the Chicago Police Department had changed its application criteria and only required a high school diploma in order to be eligible to apply for a position as a Chicago Police officer.

Former Westwood Employees

Daniel Smith

257. From December 2004 until October 2008, Daniel Smith (hereinafter "Mr. Smith") was employed as an adjunct criminal justice instructor at Defendants' DuPage campus.

258. As a Criminal Justice Instructor, Mr. Smith reported to Criminal Justice Department Chair, Richard Schak and Defendants' DuPage campus President, Kelly Moore.

259. During Mr. Smith's time teaching at Westwood, he observed that approximately 30% to 40% of his students had been convicted of a criminal offense such as retail theft, drug possession, robbery and grand larceny.

260. Mr. Smith discovered that many of his students with criminal backgrounds were unaware that their criminal records could negatively affect their opportunities to secure employment in law enforcement.

261. Mr. Smith informed numerous criminal justice students with criminal backgrounds that it would be very difficult for them to qualify for an Illinois Department of Financial and Professional Regulation (IDFPR) Permanent Employee Registration Card (PERC).

262. Mr. Smith also informed students that without a PERC, they would not be able to obtain employment in law enforcement.

263. Upon learning that Mr. Smith was educating his students with criminal backgrounds about the actual probability of their securing employment in law enforcement, Ms. Moore reassured students that they could obtain jobs in the criminal justice field despite having criminal backgrounds.

264. Ms. Moore failed to disclose to these students that their criminal records would materially limit their job prospects.

Melissa Williams

265. From October 2005 to January 2008, Melissa Williams (hereinafter "Ms. Williams") was employed as an adjunct criminal justice instructor at Defendants' Chicago Loop campus.

266. During Ms. Williams' time as an instructor, she taught between four and six classes per ten-week term, with approximately 20-30 students per class.

267. Before each term, Ms. Williams'asked her students their motivation for pursuing a criminal justice degree at Westwood.

268. Ms. Williams' students usually responded that they became interested in Defendants' Criminal Justice Program after viewing Defendants' television advertisements depicting crime scene investigation, forensics, and police officers pursuing criminal suspects.

269. Many students stated that they wanted to become forensics specialists and believed they could do so because what they had seen on Defendants' television advertisements.

270. Many students expressed their interest in becoming police officers for the Chicago Police Department.

271. Several students told Ms. Williams that after disclosing their goals to their admissions representatives, they assured the students that they could become Chicago police officers with a degree from Westwood.

272. During this time, the Chicago Police Department's hiring criteria specifically required a regionally accredited degree.

273. Ms. Williams observed that approximately four students per class had been convicted of a crime.

274. Many students with criminal histories expressed concerns about their job prospects in law enforcement to Ms. Williams.

275. In response to her students' inquiries and concerns, Ms. Williams established an "expungement workshop" in an attempt to connect these students with organizations that assist with expungement of criminal records, such as Cabrini Green Legal Aid and the Wiley Resource Center.

276. When Ms. Williams asked the students who had criminal backgrounds why they were pursuing a career in law enforcement, every one of these students replied that their admissions representatives informed them that they would be able to secure employment in law enforcement despite their criminal backgrounds.

277. Approximately 20 students informed Ms. Williams that they had attempted to transfer or pursue a higher degree from different schools, but were disappointed that the only schools that were accepting Defendants' credits or degree were Argosy University and East West University.

278. Ms. Williams taught one juvenile justice class per term, totaling approximately ten juvenile justice classes.

279. Some students had inquired about obtaining internships and employment with the Cook County Juvenile Probation Department.

280. Approximately 30 students informed Ms. Williams that after inquiring about these positions, representatives of the Cook County Juvenile Probation Department informed them that their degree was not sufficient and that they would have to obtain another bachelor's degree from a regionally accredited school or obtain a master's degree from a regionally accredited school before the Cook County Juvenile Probation Department would consider their applications.

281. Many students told Ms. Williams that they expressed their concerns about accreditation to criminal justice faculty, including Defendants' Chicago Loop campus Academic Dean, Dillon Rasmussen, who informed the students that Defendants would obtain the "next level" of regional accreditation over the next "couple of years".

Consumer Illustrations

282. To date, several consumers have filed complaints against Defendants with the Office of the Illinois Attorney General. The following allegations in Paragraphs 283 through 422 are pled as examples of Defendants' unlawful business practices and are not meant to be exhaustive. The unlawful conduct of Defendants is ongoing and continuous. Plaintiff reserves the right to prove that consumers, other than those who have complained to the Office of the Attorney General and other than the illustrative examples below, have been injured as a result of Defendants' unlawful business practices.

Former Westwood Students

Todd Brown

283. From August 2006 until May 2009, Todd Brown (hereinafter "Mr. Brown") was enrolled in Defendants' School of Justice at its DuPage campus.

284. Mr. Brown learned about Defendants' school by attending a presentation given by Defendants' representatives at Mr. Brown's high school.

285. Mr. Brown was initially interested in Defendants' bachelor's degree program because it could be completed in three years rather than four.

286. After talking with one of Defendants' admissions representatives by telephone, Mr. Brown arranged to meet with the representative on Defendants' DuPage campus.

287. During the meeting, Mr. Brown took a campus tour with Defendants' admissions representatives and members of Defendants' Criminal Justice Program faculty.

288. During Mr. Brown's on-campus visit, he told Defendants' his plans to become a police officer.

289. Defendants told Mr. Brown that Westwood was the best school for him because Defendants could easily place Mr. Brown with a police department upon graduation.

290. Defendants failed to explain to Mr. Brown that he would not be able to apply to certain police departments with a bachelor's degree from Defendants' institution because they were not regionally accredited.

291. In May 2009, Mr. Brown graduated from Defendants' School of Justice with a bachelor's degree in criminal justice.

292. Shortly after graduation, Mr. Brown discovered that the Illinois State Police was hiring police officers and applied for a position.

293. Mr. Brown passed the written and physical tests required as part of the Illinois State Police hiring process.

294. After passing the written test, physical test, and participating in several more interviews, the Illinois State Police contacted Mr. Brown and informed him he could no longer participate in their hiring process because his Westwood degree was not regionally accredited.

295. Mr. Brown took out over $52,000 in student loans to attend and complete Defendants' criminal justice degree.

296. As of April 2011, Mr. Brown is paying back his loans and is working as a cashier at a movie theater.

Ricardo Rivera

297. From October 2004 until August 2007, Ricardo Rivera (hereinafter "Mr. Rivera") was enrolled in Defendants' School of Justice at their Chicago Loop campus.

298. In September 2004, after viewing Defendants' television advertisements promoting their Criminal Justice Program, Mr. Rivera contacted one of Defendants' admissions representatives by telephone to inquire about the program.

299. During their conversation, the parties scheduled to meet within a couple of days at the Defendants' Chicago Loop campus.

300. During the meeting, the admissions representative gave Mr. Rivera a tour of the campus and Mr. Rivera completed a 30 minute placement exam.

301. After completing the placement exam, Mr. Rivera provided the admissions representative Defendants' required $100 application fee.

302. After paying the application fee, the admissions representative provided Mr. Rivera with an enrollment agreement, arbitration agreement, and other paperwork.

303. After Mr. Rivera completed the enrollment documents, the admissions representative asked him about his career goals upon completing the Criminal Justice Program.

304. Mr. Rivera responded that he intended to become a police officer with the Chicago Police Department, and then later, planned to attend law school.

305. The admissions representative replied that Mr. Rivera could become a police officer with the Chicago Police Department and that he could enroll in law school with a criminal justice degree from Westwood.

306. The admissions representative asked whether Mr. Rivera had been convicted of any felonies, because if he had, then he would not be able to carry a pistol, thereby limiting his career prospects in law enforcement.

307. Mr. Rivera responded that he had been arrested "a few times" for trespassing, but that he had not been convicted of any felonies.

308. The admissions representative replied that Mr. Rivera's arrests would be "overlooked" by law enforcement agencies.

309. Mr. Rivera then visited Defendants' financial aid office where he completed the Free Application for Federal Student Aid (FAFSA).

310. The financial aid officer encouraged Mr. Rivera to obtain a co-signor, but he was unable to locate one.

311. The Financial aid officer then told Mr. Rivera that he was approved for both federal Stafford and private Sallie Mae loans without a co-signor.

312. During Mr. Rivera's second year as a Westwood student, he observed the Criminal Justice Program graduating class of Fall and Winter 2006 complaining that the Chicago Police Department did not accept applications from Westwood graduates.

313. The Criminal Justice Program graduating class of Fall and Winter 2006 also complained that they could not apply to graduate school or transfer to other schools because

almost no schools were accepting credits from Westwood due to Westwood's national accreditation.

314. After hearing the complaints from the Criminal Justice Program 2006 graduating class, Mr. Rivera and his classmates asked their instructors about the Chicago Police Department's hiring criteria.

315. Mr. Rivera's instructors replied that although they would not be able to become Chicago police officers, they could always apply to suburban police departments and then transfer to Chicago at a later time.

316. Approximately four of Mr. Rivera's instructors explained that there was no real difference between national and regional accreditation, and that it was all very "political".

317. Mr. Rivera and his classmates also expressed their concerns about Defendants' accreditation to Defendants' Chicago Loop Academic Dean, Dillon Rasmussen, and Criminal Justice instructor, Carl Cooper.

318. Mr. Rasmussen and Mr. Cooper reassured Mr. Rivera by saying that they knew that Westwood students had been "caught off guard by Westwood's national accreditation", but that should "not stop the students from going around that obstacle and achieving their goals".

319. In the Summer of 2007, Mr. Rivera was unable to register for his last term because he needed to visit the Financial Aid Office.

320. A Financial Aid Officer told Mr. Rivera that he was "out of money" and needed to take out another private Sallie Mae loan to register for his last term.

321. During the months leading up to Mr. Rivera's graduation in May 2007, Mr. Rasmussen and Mr. Cooper told Mr. Rivera and his classmates that Defendants were in the process of obtaining regional accreditation and that even those who had graduated before

Westwood became accredited would be "grandfathered in" and their "degrees would be worth the same" as students who had graduated after Defendants became accredited.

322. Upon graduating in May 2007, Mr. Rivera applied to federal security agencies, suburban police departments and private security firms.

323. The private security firms rejected Mr. Rivera's application after discovering "hits" in his background check.

324. The Transportation Security Agency also rejected Mr. Rivera's application.

325. Mr. Rivera paid approximately $60,000 for his degree at Westwood.

326. Mr. Rivera is currently unemployed and has never been able to secure employment that relates to law enforcement or criminal justice.

Malissa Peloquin

327. From approximately March 2005 until October 2007, Malissa Peloquin (hereinafter "Ms. Peloquin") was enrolled in Defendants' School of Justice at their DuPage campus.

328. In or about December 2004, after viewing one of Defendants' online advertisements, Ms. Peloquin electronically requested additional information about the Defendants' Criminal Justice Program.

329. In or about December 2004, Defendants' admissions representative, Billy Swicher, contacted Ms. Peloquin to set up an appointment for her to meet with him and take a tour of Defendants' DuPage campus.

330. In or about January 2005, approximately one week after being contacted by Mr. Swicher, Ms. Peloquin met with Mr. Swicher at the school.

331. During their meeting, Mr. Swicher showed Ms. Peloquin some videos about different programs offered by Defendants.

332. When Ms. Peloquin expressed interest in criminal justice, Mr. Swicher told her that the Chicago Police Department was not currently accepting applicants from Westwood due to the school's lack of regional accreditation, but he assured her that Westwood would be regionally accredited within two years.

333. Ms. Peloquin then disclosed that she was more interested in being a juvenile probation officer than a police officer.

334. Mr. Swicher verbally assured Ms. Peloquin that she could become a juvenile probation officer with a Westwood degree.

335. Mr. Swicher told Ms. Peloquin that the total cost of her degree would be about $56,000.00.

336. Mr. Swicher provided Ms. Peloquin with an enrollment agreement, arbitration agreement, and other paperwork to sign.

337. Mr. Swicher only briefly explained the documents he told Ms. Peloquin to sign, and he did not explain the disclosures to her.

338. Mr. Swicher simply told Ms. Peloquin to sign and initial the paperwork, and he said she needed to do it during the meeting.

339. At that time, Ms. Peloquin provided Mr. Swicher Defendants' $100.00 application fee.

340. Ms. Peloquin later returned to the school to take the entrance examination.

341. After taking the entrance examination, in late January or early February 2005, Ms. Peloquin returned to Defendants' DuPage campus to meet with a financial aid officer concerning payment for the program.

342. Ms. Peloquin ultimately met with two different financial aid officers prior to enrollment.

343. In January or early February 2005, Ms. Peloquin met with Defendants' financial aid office for the first time. The meeting lasted ten to thirty minutes.

344. During the first meeting, the financial aid officer briefly explained the process to Ms. Peloquin, gave her paperwork to fill out, told her what documents to gather, and scheduled a second meeting.

345. In February 2005, Ms. Peloquin's met with Defendants' financial aid office for the second time.

346. During the second meeting, Defendants' financial aid officer completed Ms. Peloquin's FAFSA for her online.

347. Ms. Peloquin gave the Financial Aid officer the financial documents Ms. Peloquin had been told to bring, and she sat on the other side of the officer's desk while the officer filled out the FAFSA on the officer's computer.

348. When the officer finished, she asked Ms. Peloquin to look it over to make sure the information the officer input was accurate, and the officer then electronically submitted Ms. Peloquin's FAFSA for her.

349. During this second financial aid meeting, the financial aid officer told Ms. Peloquin that she was approved for $56,000.00 in federal student loans, which had been quoted as the approximate price of Ms. Peloquin's criminal justice bachelor's degree.

350. During this second financial aid meeting, the financial aid officer instructed Ms. Peloquin to fill out paperwork applying for a $10,000 Signature loan from Sallie Mae.

351. Defendants' financial aid officer assured Ms. Peloquin that the Signature loan was needed "just in case" something was not covered.

352. Based on these assurances by Defendants' financial aid officer, Ms. Peloquin believed that any surplus created by the Signature loan would be returned.

353. In January 2006, Ms. Peloquin received an e-mail relaying her deadline to fill out another FAFSA.

354 At this time, Ms. Peloquin discovered that she had to fill out the FAFSA once every year, or approximately every third term at Westwood.

355. However, because Ms. Peloquin believed that she had already accepted and received the $56,000 in federal loans the original financial aid officer had told Ms. Peloquin she was approved for, Ms. Peloquin believed that filling out additional FAFSAs was merely a requirement of continuing to attend school.

356. Ms. Peloquin was unaware that every time she filled out a FAFSA she was taking out a new loan.

357. In fact, Ms. Peloquin specifically asked Defendants why she needed to fill out a second FAFSA when she had already been approved for the full amount of the cost quoted to her by Defendants.

358. Defendants told Ms. Peloquin that it was "just a financial aid thing."

359. In January 2006, Ms. Peloquin attempted to register for her third term.

360. At this time, Ms. Peloquin was told she needed to visit Defendants' financial aid office before registering.

361. A financial aid officer reminded Ms. Peloquin to fill out her FAFSA, and also told Ms. Peloquin that she needed to apply for a second $10,000 Signature Sallie Mae loan.

362. The financial aid officer again told Ms. Peloquin that this loan was "just in case" something was not covered.

363. Ms. Peloquin again assumed that any surplus funds from her "just in case" loan would be returned to the lender.

364. When Ms. Peloquin registered in January 2007, she was again told to take another $10,000.00 "just in case" loan.

365. Again, Ms. Peloquin assumed that any surplus funds from this "just in case" loan would be returned to the lender.

366. At no point did Ms. Peloquin receive any statements regarding the cost of tuition or breaking down what exactly Ms. Peloquin owed to Defendants.

367. As a general matter, the only information Ms. Peloquin received about specific costs charged to her student account was for books.

368. At beginning of each term, Ms. Peloquin purchased books from Defendants' campus bookstore.

369. Ms. Peloquin would give the associate at the register her student identification, and the associate would give Ms. Peloquin a receipt to sign saying that the amount would be charged to her student account.

370. Ms. Peloquin's books cost approximately $400.

371. Ms. Peloquin thought that the "just in case loans" were being applied to cover the cost of her books.

372. In October 2007, Ms. Peloquin graduated with a bachelor's degree in criminal justice.

373. Ms. Peloquin never had an exit interview with Defendants' financial aid office concerning her student loans.

374. Ms. Peloquin never received any notice from Defendants to schedule an exit interview.

375. In April 2008, approximately six months after graduation, Ms. Peloquin called Sallie Mae seeking information concerning what her monthly loan payments would be.

376. At that time, Ms. Peloquin was told that she had multiple loans of varying amounts with interest rates ranging from 2.9% to 11.9%.

377. Ms. Peloquin was told that the total amount she owed on her student loans was approximately $76,000.00; that no surplus amounts had been returned to any of her lenders; that she could not return any of the $10,000.00 "just in case" loans that Defendants' financial aid office had convinced her to take; and that her monthly payments toward her student debt would be $598.00 per month for twenty-five years.

Paul Lindsay

378. From August 2005 until July 2008, Paul Lindsay (hereinafter, "Mr. Lindsay") was enrolled in Defendants' School of Justice at their Chicago Loop campus.

379. Mr. Lindsay had knowledge of Westwood from viewing Defendants' television advertisements promoting their Criminal Justice Program.

380. Defendants' admissions representatives also visited Mr. Lindsay's high school during Mr. Lindsay's junior and senior year.

381. During Defendants' visit in Mr. Lindsay's senior year, the admissions representative told Mr. Lindsay that someone who graduated from a Westwood campus in Colorado worked for the Federal Bureau of Investigations.

382. Mr. Lindsay filled out one of the questionnaires that Defendants routinely provided to interested students during their high school visits.

383. Defendants' representatives then began calling Mr. Lindsay at least weekly.

384. Ultimately, Mr. Lindsay met with admissions representative, Thomas Cole.

385. Mr. Lindsay met with Mr. Cole on several occasions.

386. Mr. Lindsay told Mr. Cole that he wanted to become a police officer with the Chicago Police Department.

387. Mr. Cole never told Mr. Lindsay that the Chicago Police Department would not recognize Defendants' degree or credits.

388. Mr. Cole approximated that cost for a bachelor's degree in criminal justice would be $30,000.

389. Mr. Cole only told Mr. Lindsay that Defendants were accredited without specifying or explaining that Defendants were only nationally accredited.

390. Mr. Cole told Mr. Lindsay that Defendants' Career Services Office would assist Mr. Lindsay with securing part-time employment in the criminal justice field.

391. In August 2005, Mr. Lindsay enrolled in Defendants' School of Justice.

392. After Mr. Lindsay enrolled, he checked the website that the Career Services Office offered for criminal justice students.

393. Mr. Lindsay discovered that most of the jobs posted were for cashiers at stores such as Dunkin Donuts, Walgreen's, Potbelly's, etc.

394. Very few, if any, of the jobs posted were for positions relating to criminal justice.

395. After enrolling, Mr. Lindsay met with one of Defendants' Financial Aid Officers.

396. The financial aid officer convinced Mr. Lindsay to secure a private, unsecured loan through Defendants' APEX financing program.

397. Mr. Lindsay understood that he would pay $110.00 per month toward his APEX loan.

398. The financial aid officer told Mr. Lindsay that paying this amount while he attended classes would reduce the amount he would owe in private loans.

399. Based on the financial aid officer's representations, Mr. Lindsay believed that his $110.00 monthly payment was being applied to the private loans he had taken out with Sallie Mae.

400. The financial aid officer instructed Mr. Lindsay to just fill out the paperwork and that Defendants would take care of everything else.

401. Whenever Mr. Lindsay purchased books or supplies from Defendants' campus bookstore, he was told that the cost would simply be added to his loans.

402. Mr. Lindsay would only have to sign a receipt saying he purchased the items.

403. When Mr. Lindsay began Defendants' Criminal Justice Program there were between 200 and 300 other students in the program.

404. Approximately thirteen of those students graduated.

405. During Mr. Lindsay's enrollment at Westwood, rumors circulated that the Chicago Police Department did not recognize Defendants' criminal justice degree.

406. Many of Mr. Lindsay's classmates also wanted to be police officers with the Chicago Police Department.

407. On or about June 2006, the Director of Defendants' Criminal Justice Program, Richard Holloway, told a group of students including Mr. Lindsay that the rumors about the Chicago Police Department were "half true."

408. Mr. Holloway told the group of students that the Chicago Police Department did not recognize Defendants' degrees or credits, but that Defendants had many contacts in suburban police departments and that after a year or two in a suburban police department students could transfer to the Chicago Police Department with "no problem."

409. Mr. Lindsay chose to stay at Westwood based in part on Mr. Holloway's misrepresentation.

410. While Mr. Lindsay was enrolled at Westwood, he was pulled out of class on more than one occasion and told to go to the financial aid office.

411. Once in the financial aid office, Mr. Lindsay was told that he would need to apply for additional loans to register for the next term.

412. He was additionally told he could not return to any classes, including the class he had just been pulled out of, until he filled out the appropriate paperwork to apply for the necessary loans.

413. According to Mr. Lindsay, Defendants' actions felt like a "shakedown" to him.

414. In or about December 2007, Mr. Lindsay applied for a position with the Illinois Department of Corrections.

415. On or about July 2008, Mr. Lindsay was offered a position with the Illinois Department of Corrections.

416. Mr. Lindsay left Westwood with one term remaining before graduation to accept the position offered with the Illinois Department of Corrections.

417. After Mr. Lindsay joined the Illinois Department of Corrections, he learned about the State of Illinois Upward Mobility Program.

418. Mr. Lindsay asked whether the Upward Mobility Program would pay for him to finish his last term at Westwood.

419. At that time, Mr. Lindsay learned that not only would the Upward Mobility Program not pay for his last term at Westwood, the Illinois Department of Corrections would not recognize Defendants' degree if Mr. Lindsay personally paid to finish his last term because Defendants' Criminal Justice Program was not regionally accredited.

420. Mr. Lindsay's current position as Officer with the Illinois Department of Corrections requires only a high school diploma or GED.

421. For Mr. Lindsay to be promoted to Sergeant, or any other rank higher than Officer, he would need a four year degree from a regionally accredited institution.

422. The time, effort, and money Mr. Lindsay spent in Defendants' Criminal Justice Program did not aid him in obtaining his employment with the Illinois Department of Corrections and will not aid him in advancing in the Illinois Department of Corrections.

APPLICABLE STATUES

423. Section 2 of the Consumer Fraud Act, 815 ILCS 505/2, provides:

> Unfair methods of competition and unfair or deceptive acts or practices, including but not limited to the use or employment of any deception, fraud, false pretense, false promise, misrepresentation or the concealment, suppression or omission of any material fact, with intent that others rely upon the concealment of any practice described in section 2 of the "Uniform Deceptive Trade Practices Act," approved August 5, 1965, in the conduct of any trade or commerce are hereby declared unlawful whether any person has in fact been mislead, deceived or damaged thereby.

REMEDIES UNDER THE CONSUMER FRAUD ACT

424. Section 7 of the Consumer Fraud Act, 815 ILCS 505/7, provides:

> a. Whenever the Attorney General has reason to believe that any person is using, has used, or is about to use any method, act or practice declared by the Act to be unlawful, and that proceedings would be in the public interest, he may bring an action in the name of the State against such person to restrain by preliminary or permanent injunction the use of such method, act or practice. The Court, in its discretion, may exercise all powers necessary, including but not limited to: injunction, revocation, forfeiture or suspension of any license, charter, franchise, certificate or other evidence of authority of any person to do business in this State; appointment of a receiver; dissolution of domestic corporations or association suspension or termination of the right of foreign corporations or associations to do business in this State; and restitution.
>
> b. In addition to the remedies provided herein, the Attorney General may request and this Court may impose a civil penalty in a sum not to exceed $50,000 against any person found by the Court to have engaged in any method, act or practice declared unlawful under this Act. In the event the court finds the method, act or practice to have been entered into with intent to defraud, the court has the authority to impose a civil penalty in a sum not to exceed $50,000 per violation.

425. Section 10 of the Consumer Fraud Act, 815 ILCS 505/10, provides:

> In any action brought under the provisions of this Act, the Attorney General or the State's Attorney is entitled to recover costs for the use of this State.

VIOLATIONS

CONSUMER FRAUD AND DECEPTIVE PRACTICES ACT

426. Defendants have engaged in a course of trade or commerce which constitutes unfair or deceptive acts or practices declared unlawful under Section 2 of the Consumer Fraud Act, 815 ILCS 505/2, by engaging in the following unfair or deceptive acts or practices:

a. misrepresenting or making false promises that Defendants' criminal justice degree would help students get jobs in law enforcement, when in fact many police departments will only hire graduates from regionally accredited schools, and Defendants are not regionally accredited;

b. misrepresenting or making false promises that that Defendants' criminal justice degree would help students become Chicago police officers, when in fact the Chicago Police Department's 2003 and 2006 hiring criteria specifically required a degree from a regionally accredited college or university;

c. misrepresenting or making false promises that Defendants' criminal justice degree would help students secure employment as Illinois State Police Officers, when in fact the Illinois State Police's hiring criteria specifically requires a degree from a regionally accredited college or university;

d. misrepresenting or making false promises that Defendants' criminal justice degree would help students secure employment as police officers in suburban police department, when, in fact many suburban police departments' hiring criteria require a degree from a regionally accredited college or university;

e. misrepresenting or making false promises that Defendants' criminal justice degree would help prospective and current students with criminal backgrounds secure employment as police officers, when in fact students with criminal backgrounds are very unlikely to obtain such employment;

f. misrepresenting or making false promises that Defendants would assist prospective and current students with criminal backgrounds with expunging their records, when in fact Defendants had no knowledge of whether students were eligible for or could benefit from expungement;

g. misrepresenting or making false promises that upon graduation, students could obtain employment as suburban police officers and then easily transfer to the Chicago Police Department, when in fact the Chicago Police Department does not accept lateral transfers from other jurisdictions;

h. misrepresenting or making false promises to prospective and current students regarding the status of Defendants' accreditation;

i. misrepresenting or making false promises to prospective and current students that Defendants were regionally accredited, when in fact, Defendants were only nationally accredited;

j. misrepresenting or making false promises to prospective and current students that defendants were to attain regional accreditation by a date certain, when in fact regional accreditation was not attainable within the timeframe identified by Defendants;

k. misrepresenting or making false promises to current students that if Defendants had obtained regional accreditation after the students had graduated, they would be "grandfathered in" and their Westwood degree would reflect regional accreditation;

l. misrepresenting or making false promises to prospective and current students that Defendants' credits would transfer to any other institutions of higher learning, when in fact there are a limited number of institutions that accept Defendants' credits;

m. misrepresenting or making false promises to prospective and current students that they could obtain a graduate degree from any other institutions of higher learning, when in fact there are a limited number of institutions that accept Defendants' bachelor's degree;

n. misrepresenting or making false promises that Defendants would assist prospective and current students with securing part-time employment in their field of study to minimize students' financial burden during enrollment at Westwood;

o. misrepresenting or making false promises regarding the nature of Defendants' APEX financing program as only requiring the student to make monthly payments while in school;

p. failing to inform prospective and current students who secured student financing through Defendants' APEX financing program that the students would ultimately be responsible for the remaining balance after graduating or leaving Defendants' program;

q. misrepresenting or making false promises regarding financial aid as alleged in the complaint;

r. deceptively manipulating the manner in which information about Defendants' programs is presented on the internet;

s. unfairly or deceptively employing an advertising scheme designed to optimize the search engine results derived from specified search terms in a manner that has the capacity to mislead or confuse consumers as to Defendants' regional accreditation status and employment opportunities available to graduates of Defendants' Criminal Justice Program;

t. bidding on search terms to prompt advertisements for Defendants' programs when the relationship between the advertisements and the search terms have the capacity to mislead or confuse consumers;

u. advertising Defendants' programs on the internet in a manner that has the capacity to mislead or confuse consumers as to Defendants' regional accreditation status; and

v. advertising Defendants' programs on the internet in a manner that has the capacity to mislead or confuse consumers as to the employment opportunities available to graduates of Defendants' Criminal Justice Program.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff prays that this honorable Court enter an Order:

A. Finding that Defendants have engaged in trade or commerce within the meaning of Section 2 of the Consumer Fraud Act;

B. Finding that the Defendants have violated Section 2 of the Consumer Fraud Act, 815 ILCS 505/2, by, but not limited to engaging in the unfair or deceptive acts and practices alleged herein;

C. Preliminarily and permanently enjoining the Defendants from engaging in the

deceptive or unfair acts and practices alleged herein;

D. Declaring that all contracts entered into between the Defendants and Illinois consumers by the use of methods and practices declared unlawful are rescinded and requiring that full restitution be made to said Illinois consumers;

E. Revoking, forfeiting or suspending the Defendants' Criminal Justice Program;

F. Assessing a civil penalty in the amount of Fifty Thousand Dollars ($50,000) per violation of the Act if the Court finds the Defendants have engaged in methods, acts or practices declared unlawful by the Act with the intent to defraud; if the Court finds Defendants have engaged in methods, acts or practices declared unlawful by the Act without the intent to defraud, then assessing a statutory civil penalty of Fifty Thousand Dollars ($50,000), all as provided in Section 7 of the Consumer Fraud Act, 815 ILCS 505/7;

G. Requiring the Defendants to pay all costs for the prosecution and investigation of this action, as provided by section 10 of the Consumer Fraud Act, 815 ILCS 505/10; and

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

Respectfully Submitted,
THE PEOPLE OF THE STATE OF
ILLINOIS, by LISA MADIGAN,
ATTORNEY GENERAL OF ILLINOIS

BY: _____
DEBORAH HAGAN
Division Chief,
Consumer Protection Division

_____
JAMES D. KOLE
Consumer Fraud Bureau, Chief

Attorney No. #99000

LISA MADIGAN
Illinois Attorney General

DEBORAH HAGAN
Division Chief, Consumer Protection Division

JAMES D. KOLE
Chief, Chicago Consumer Fraud Bureau

AKEELA WHITE
Assistant Attorney General

MICHELE CASEY
Assistant Attorney General

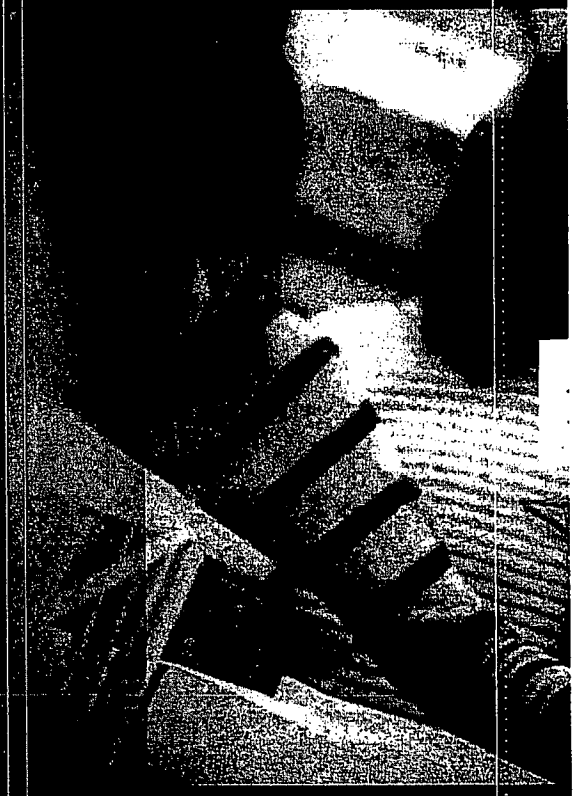
KEVIN HUDSPETH
Assistant Attorney General

COLLEEN BISHER
Assistant Attorney General

GREGORY GRZESKIEWICZ
Assistant Attorney General

Exhibit 1

Career Success Kit



BUSINESS

DESIGN

TECHNOLOGY

JUSTICE

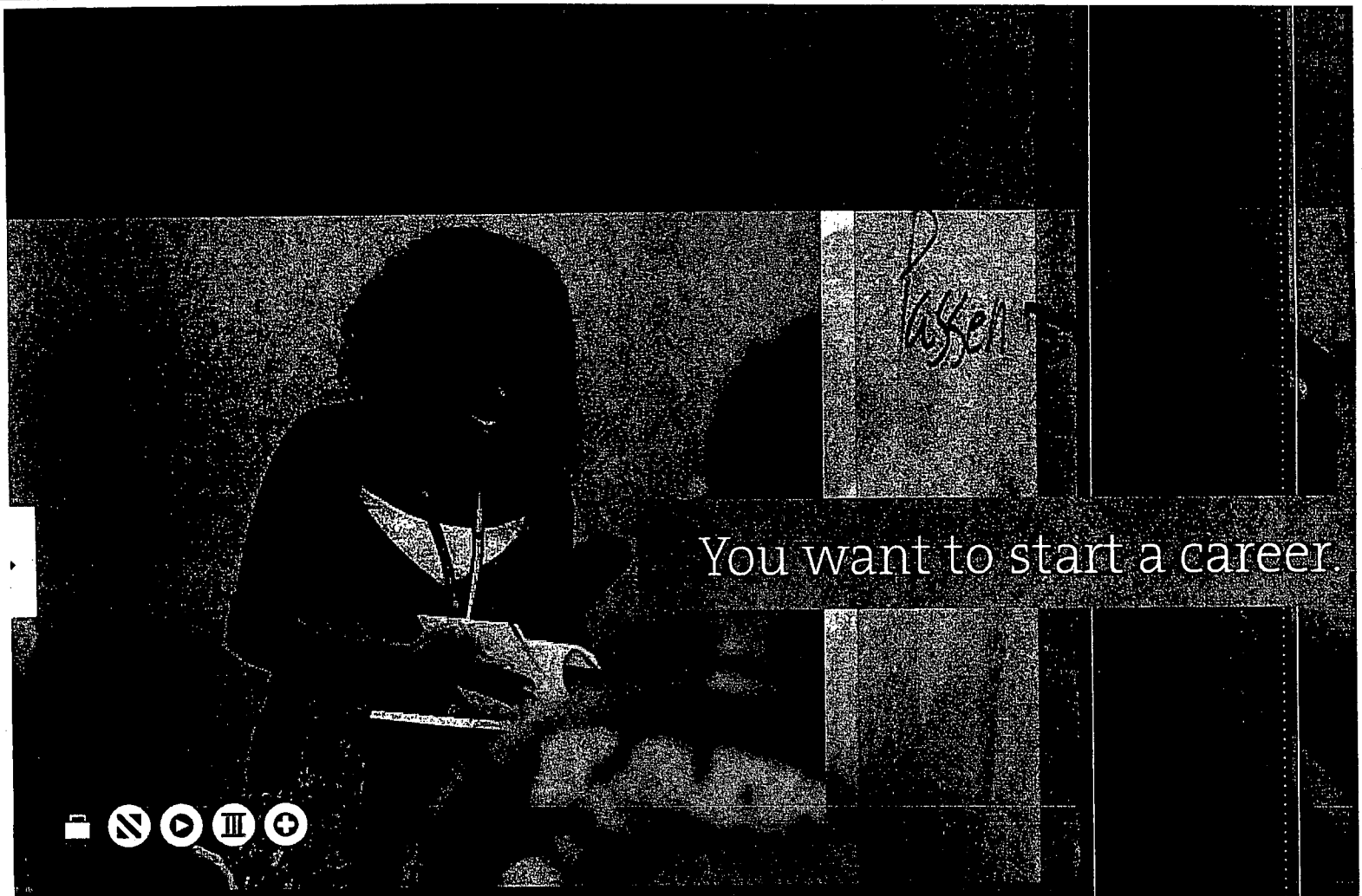
WESTWOOD COLLEGE®

And neither are we.

Westwood College offers students a hands-on approach to learning, taught by working professionals at our 14 distinct campuses. Westwood is committed to giving you more than an accredited* degree. We are committed to providing you a jump-start on your career. While Westwood isn't a traditional college, we have a tradition of our own: preparing students for careers they'll love.

For information about our graduation rates, the median debt of students who completed the program and other important information, please visit our website at westwood.edu/program-disclosures.

*Accredited by the Accrediting Council for Independent Colleges and Schools (ACICS) or Accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC).


You want to start a career.

[illegible] your time.

Here, you won't wait two years to take the classes that interest you. At Westwood, our degree programs allow you to begin career-focused classes in your first term.* And each of our programs is designed to help you earn your associate degree in less than two years or your bachelor's degree in just three years. With classes available during the day and at night, it's easy to create the schedule that fits your life.

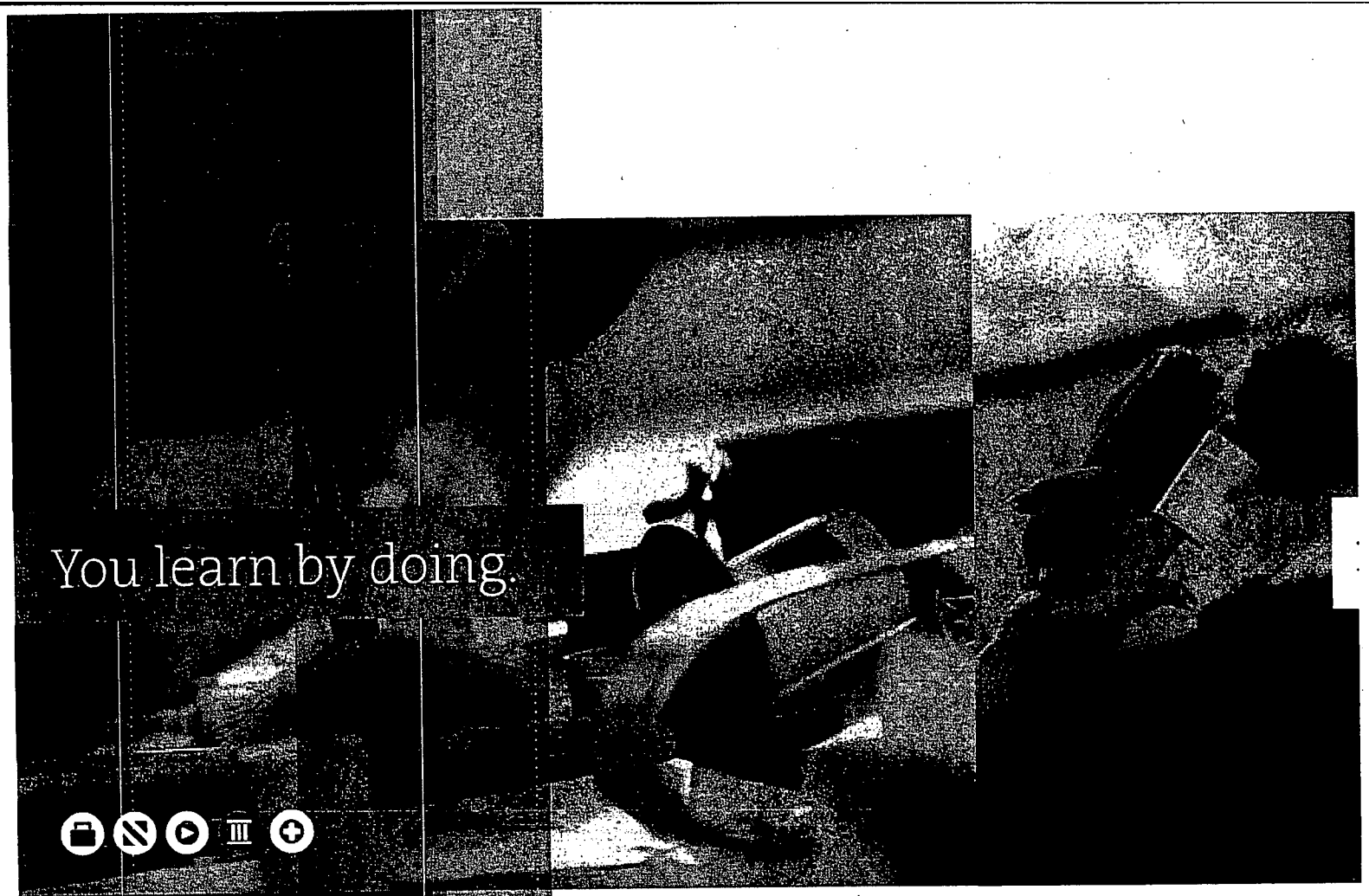
THE FAST TRACK TO YOUR CAREER

[illegible] > LESS THAN 2 YEARS

[illegible] > 3 YEARS

[illegible] > 14 MONTHS

*Subject to [illegible] meeting [illegible] place [illegible] requirements.



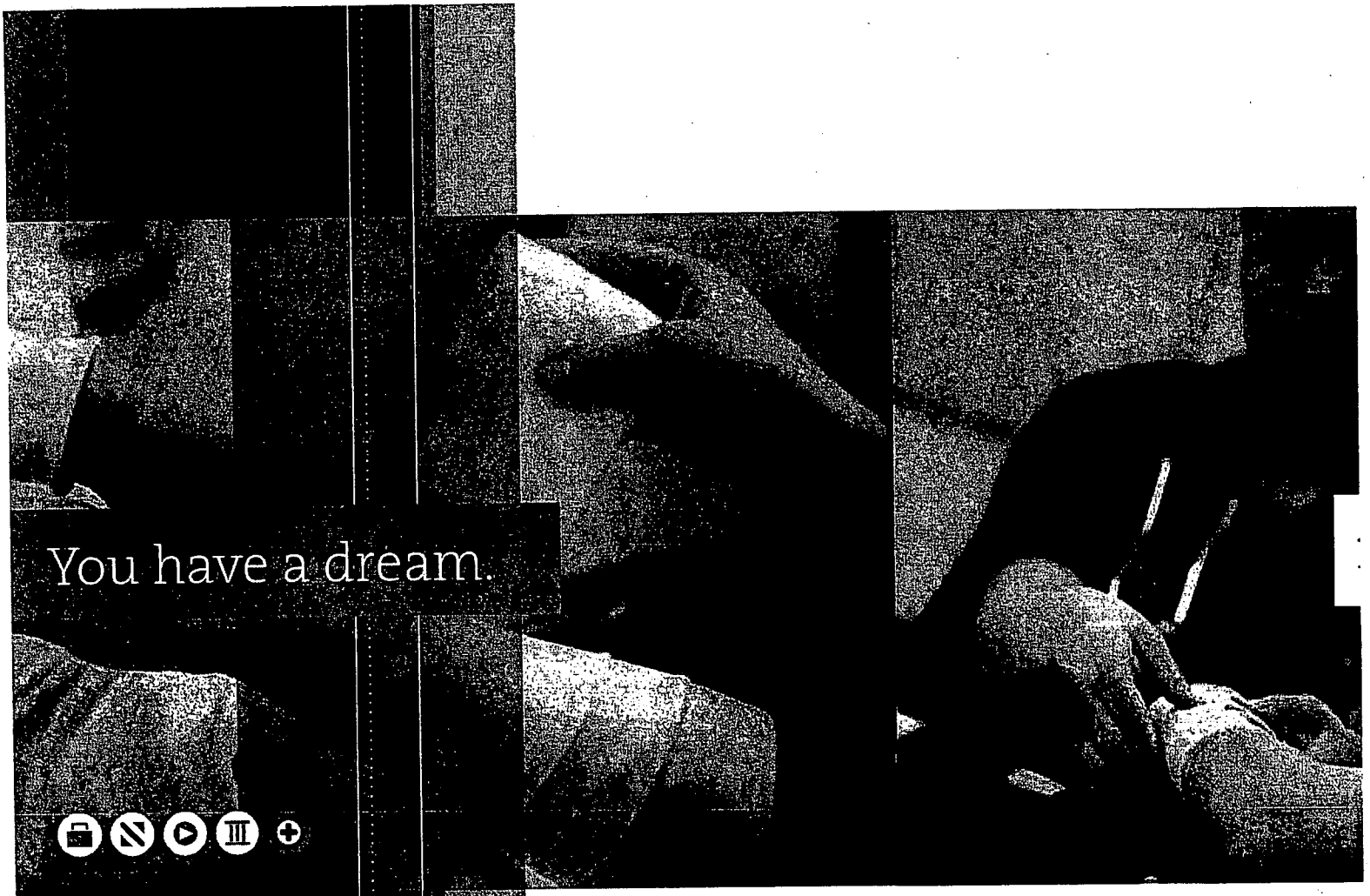
Our classes are hands on.

At Westwood, we've replaced your typical large classes and lecture halls with small classes and interactive labs. Our faculty of working professionals gives you the hands-on experience, one-on-one attention and real-world preparation required to earn your degree and succeed in today's competitive career environment. Sure, they teach classes, but our faculty also helps keep our curriculum up to date with the latest industry trends. Westwood's practical, experience-based approach to education ensures that, by graduation, you'll be prepared to start a successful career in your field.

You shouldn't do this alone.

That's why we're here.

We take your success as seriously as you do. As a Westwood student, you'll be assigned a personalized group of Success Team℠ members to support you from the day you enroll until after you've begun your career. Your Success Team is available to help you with any questions you may have along the way, including those regarding enrollment, student financing and academic support. We encourage you to use this team whenever you need—no question or concern is too big or too small.



We'll help you achieve it.

We're here to help you prepare for a career you'll love. Our Career Services department will guide you into your chosen field by helping you identify your career goals, build your résumé and polish your interviewing skills. We'll also help connect you with top employers in your field. From the day you begin classes, to the day you begin your career, we'll help you prepare for success. And, to ensure that you remain employable and knowledgeable in your field years after you graduate, Westwood also offers tuition-free alumni retraining courses.* These employers have hired our graduates: †

- Activision Blizzard
- AT&T
- Cedars-Sinai
- First Data
- Georgetown University Law School
- Halliburton
- Home Depot
- IBM
- Image Works Studio
- JP Morgan Chase & Co.
- Level 3 Communications
- Marriott Hotels & Resorts
- Pinnacle Engineering
- Richmond American Homes
- Sherwin-Williams
- United States Secret Service
- U.S. Bank
- U.S. Department of Health and Human Services

*Books, tools and other fees may apply.

†Westwood College must track the initial employers of its graduates for regulatory and accreditation purposes. This list is a compilation of employers of Westwood College graduates from each region from June 2007 to June 2008. This is not intended to represent an endorsement of Westwood College by the listed employers.

You need help paying for college.

We'll help you find a way.

Figuring out how to pay for your college education can be an overwhelming task, but don't let that stop you. One of the best investments you can make is an investment in yourself—and your education. A college education can give you the tools you need to change your life and start your career. It may seem difficult to afford an education on your own, but loans, grants and scholarships can give you the support you need to get the education you want. At Westwood, one of our student finance specialists will help you determine the best way to pay for your education and navigate you through the process every step of the way. Not only will we walk you through the process of applying for grants and loans, we'll also be here to answer any questions you have during your time as a Westwood student.

SOURCES OF MONEY TO PAY FOR COLLEGE

SCHOLARSHIPS & GRANT MONEY*

MONEY YOU DO NOT HAVE TO PAY BACK. SCHOLARSHIPS AND GRANTS ARE AWARDED BASED ON MERIT AND FINANCIAL NEED.

*Available to those who qualify. Subject to refund based on satisfactory academic performance and class attendance.

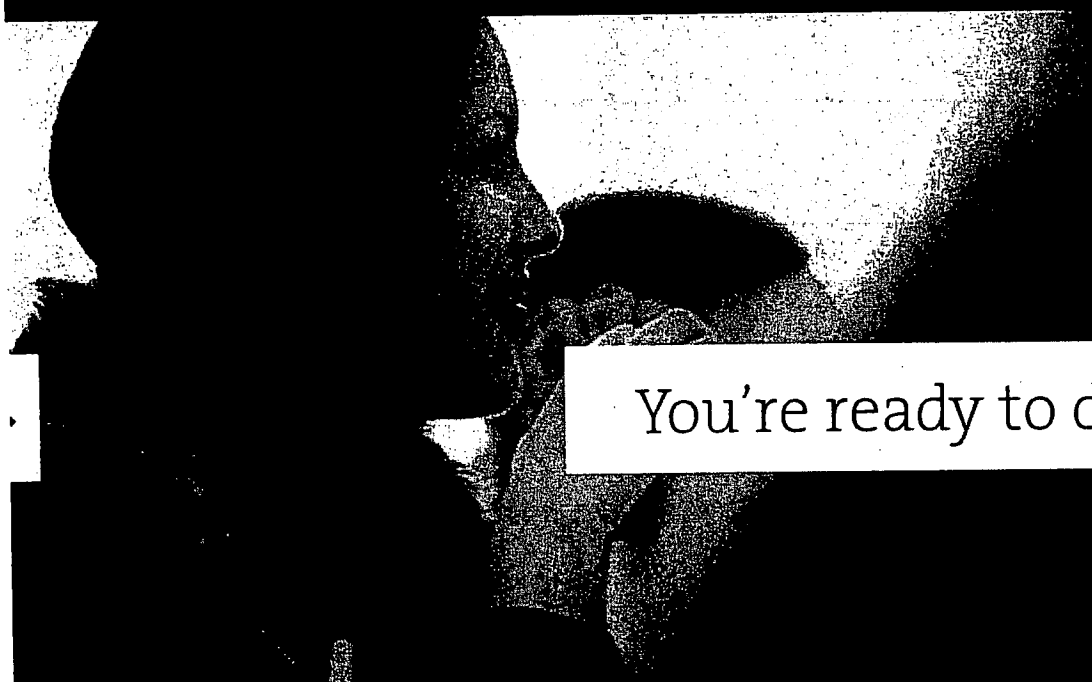
YOUR MONEY

MONEY PAID OUT OF YOUR POCKET FROM SAVINGS OR EARNINGS.

BORROWED MONEY†

MONEY THAT YOU PAY BACK WITH INTEREST. THESE LOANS MAY BE FEDERAL LOANS, PRIVATE OR BANK LOANS, OR INSTITUTIONAL FINANCING. BECAUSE THESE OPTIONS OFTEN VARY IN INTEREST RATES AND REQUIREMENTS TO RECEIVE THE LOAN, OUR STUDENT FINANCE SPECIALISTS WILL WORK WITH YOU TO FIND THE LOAN(S) THAT FITS YOU BEST.

†Available to those who qualify.



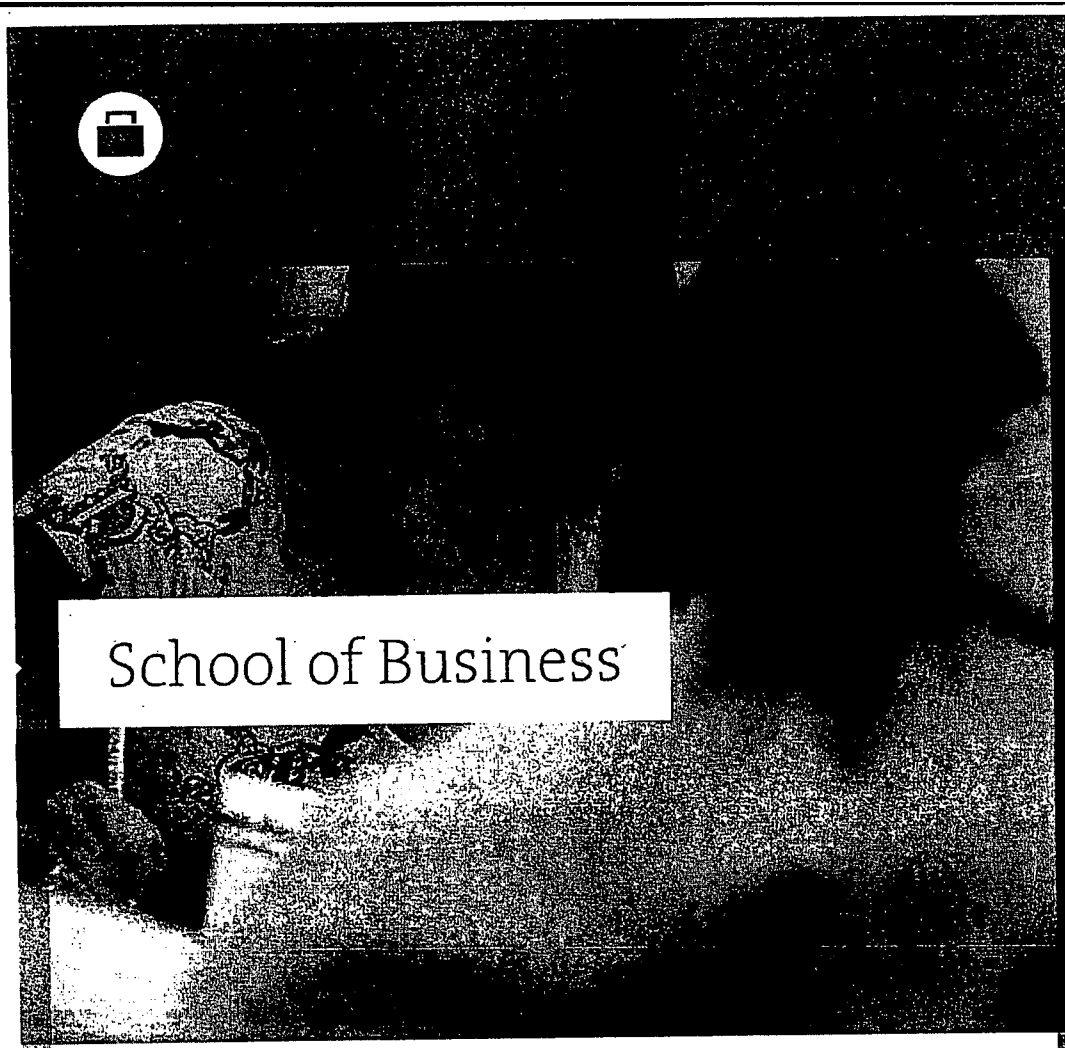
You're ready to change your life.

This is the perfect place to start.

A degree from Westwood will give you the chance to find a career you'll really enjoy. Each of our unique schools, and the degree programs within them, are designed to help you develop your skills and talents in order to prepare you for a career. A college degree—associate, bachelor's, or master's—will change the way employers view you and will help make you more valuable, desirable and employable for the rest of your life.

RELATIONSHIP OF EDUCATION LEVEL TO INCOME AND UNEMPLOYMENT*

EDUCATION LEVEL	[illegible] INCOME	UNEMPLOYMENT RATE
LESS THAN HIGH SCHOOL DIPLOMA	$23,088	14.9%
HIGH SCHOOL DIPLOMA	$32,552	10.3%
ASSOCIATE DEGREE	$39,884	7.0%
BACHELOR'S DEGREE	$53,976	5.4%
MASTER'S DEGREE	$66,144	4.0%



School of Business

DEGREE PROGRAMS >

Business Administration
Majors in:
- Accounting and Financial Management
- Healthcare Management
- Management
- Marketing Management

Construction Management

Master of Business Administration

With a degree from Westwood College's School of Business, you'll learn the skills necessary to help you launch your career. Westwood offers business degrees in many different fields, so no matter where your talents lie, you can get a degree in a field that you'll love. Career opportunities and salaries vary by program, but here is a closer look at potential career opportunities and earnings with a degree in business administration: major in accounting and financial management.

START YOUR CAREER >

Careers Westwood graduates have pursued with this degree:*

> Assistant Controller
> Lead Accountant
> Accounting Supervisor
> Accountant for A/P

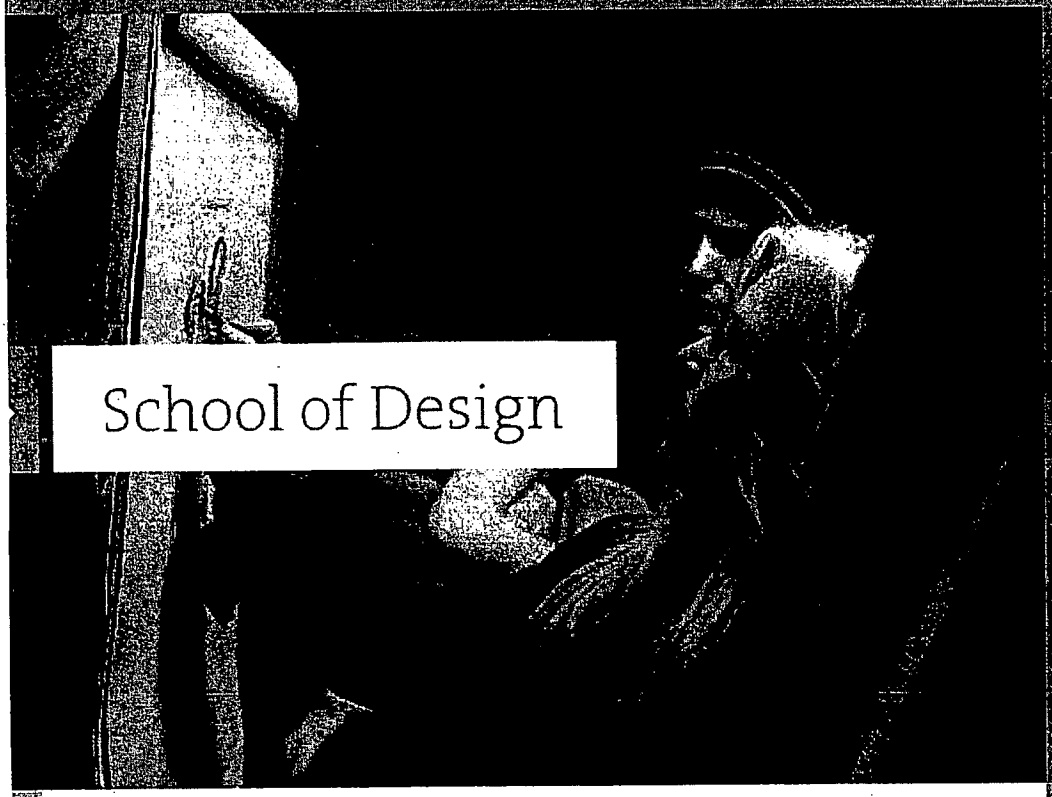
To see a list of potential careers for graduates in the School of Business from the Department of Labor, visit our website at westwood.edu/occupational-disclosures.

YOUR POTENTIAL >

The below wage estimates represent Westwood graduates and experienced accountants and is not representative of all business degrees.

Westwood College	Low	Median	High
$43,065†	$54,205‡	$68,702‡	$87,859‡
Average Graduate's Entry Salary	EXPERIENCED Accountants and Auditors: Annual Wage		

*Graduates without experience in the field will likely start in entry-level positions. Position titles and responsibilities may vary by hiring company.
†Based upon Westwood College graduates from July 1, 2009 through June 30, 2010 and California Employment Development Department Salary Data.
‡Job Code 13-2011.01 Source: http://www.labormarketinfo.edd.ca.gov/



School of Design

DEGREE PROGRAMS >

- Animation
- Computer Aided Design/ Architectural Drafting
- Game Art
- Graphic Design and Multimedia
- Interior Design
- Visual Communications

Westwood College's School of Design gives you the necessary training and skills to turn your talent and interest in art and visual communications into a career. With a degree in one of our design programs, you'll be on your way to a career in this exciting industry. Career opportunities and salaries vary by program, but here is a closer look at potential career opportunities and earnings for a major in interior design.

START YOUR CAREER >

Careers Westwood graduates have pursued with this degree:*

> Designer/Interior Designer

> Drafter

To see a list of potential careers for graduates in the School of Design from the Department of Labor, visit our website at westwood.edu/occupational-disclosures.

YOUR POTENTIAL >

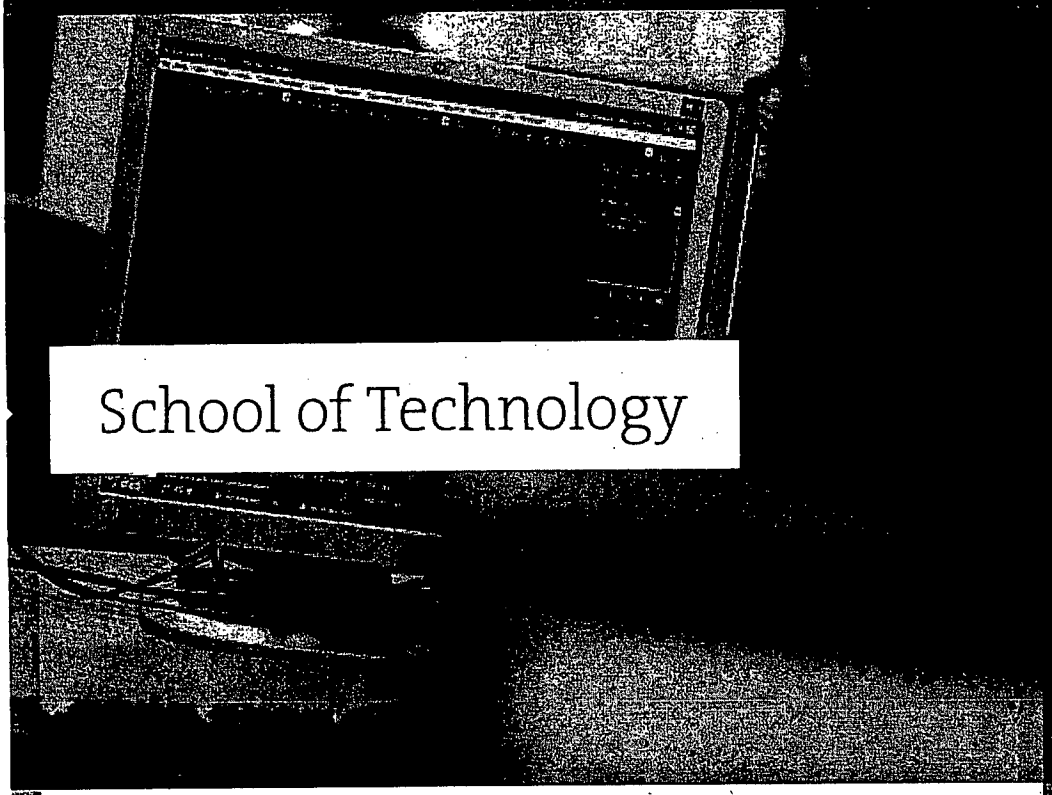
The below wage estimates represent Westwood graduates and experienced interior designers and is not representative of all design degrees.

Westwood College	Low	Median	High
$27,452*	$37,045†	$51,605‡	$72,821†
Average Graduate Salary	EXPERIENCED Interior Designers		
Annual Wage			

*Graduates without experience in the field will likely start in entry-level positions. Position titles and responsibilities may vary by hiring company.

†Based upon Westwood College graduates from July 1, 2009 through June 30, 2010 and California Employment Development Department Salary Data.

‡Job Code 27-1025.00 Source: http://www.labormarketinfo.edd.ca.gov/



School of Technology

DEGREE PROGRAMS >

Information Technology

Information Technology
Majors in:
- Cisco® Network Systems
  (Denver North campus only)
- Computer Forensics
- Network Management
- Systems Security

Game Software Development

With a degree from Westwood College's School of Technology, you'll be prepared to begin a career in the technology industry. Our programs will give you the training and experience you need to take your certification exams* and find a career you'll love. Career opportunities and salaries vary by program, but here is a closer look at potential career opportunities and earnings for a major in information technology.

START YOUR CAREER >

Careers Westwood graduates have pursued with this degree:†

> Information Systems Developer

> Network Administrator

To see a list of potential careers for graduates in the School of Technology from the Department of Labor, visit our website at westwood.edu/occupational-disclosures.

YOUR POTENTIAL >

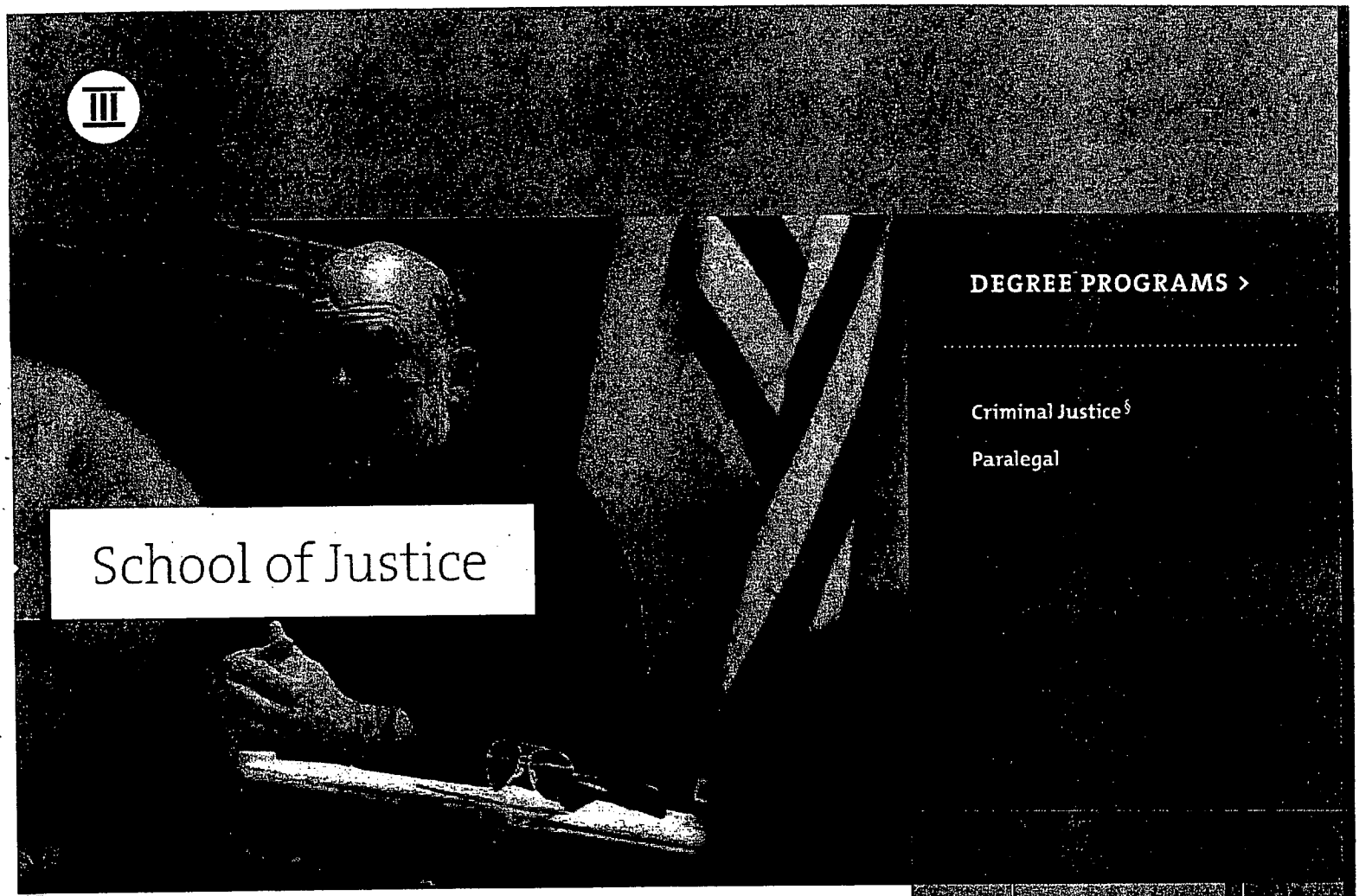
The below wage estimates represent Westwood graduates and experienced network and computer systems administrators and is not representative of all technology degrees.

Westwood College	Low	Median	High
$27,026‡	$62,744§	$79,165§	$98,550§
Average Graduate's Entry Salary	EXPERIENCED Network and Computer Systems Administrators		
Annual Wage			

*Westwood prepares graduates for certification. Graduates wishing to attain certification must take and pass any applicable tests/exams.

†Graduates without experience in the field will likely start in entry-level positions. Position titles and responsibilities may vary by hiring company.

‡Based upon Westwood College graduates from July 1, 2009 through June 30, 2010 and California Employment Development Department Salary Data.



School of Justice

DEGREE PROGRAMS >

Criminal Justice§

Paralegal

Graduates of Westwood College's School of Justice are prepared to enter the fast-paced, high-demand fields of law, law enforcement and social work. Each of the programs within the school provides you with in-depth and career-focused training, preparing you to enter your career of choice as soon as you graduate. Career opportunities and salaries vary by program, but here is a closer look at potential career opportunities and earnings for a major in paralegal.

START YOUR CAREER >

Careers Westwood graduates have pursued with this degree:*

> Paralegal/Legal Assistant

To see a list of potential careers for graduates in the School of Justice from the Department of Labor, visit our website at westwood.edu/occupational-disclosures.

YOUR POTENTIAL >

The below wage estimates represent Westwood graduates and experienced paralegals and legal assistants and is not representative of all justice degrees.

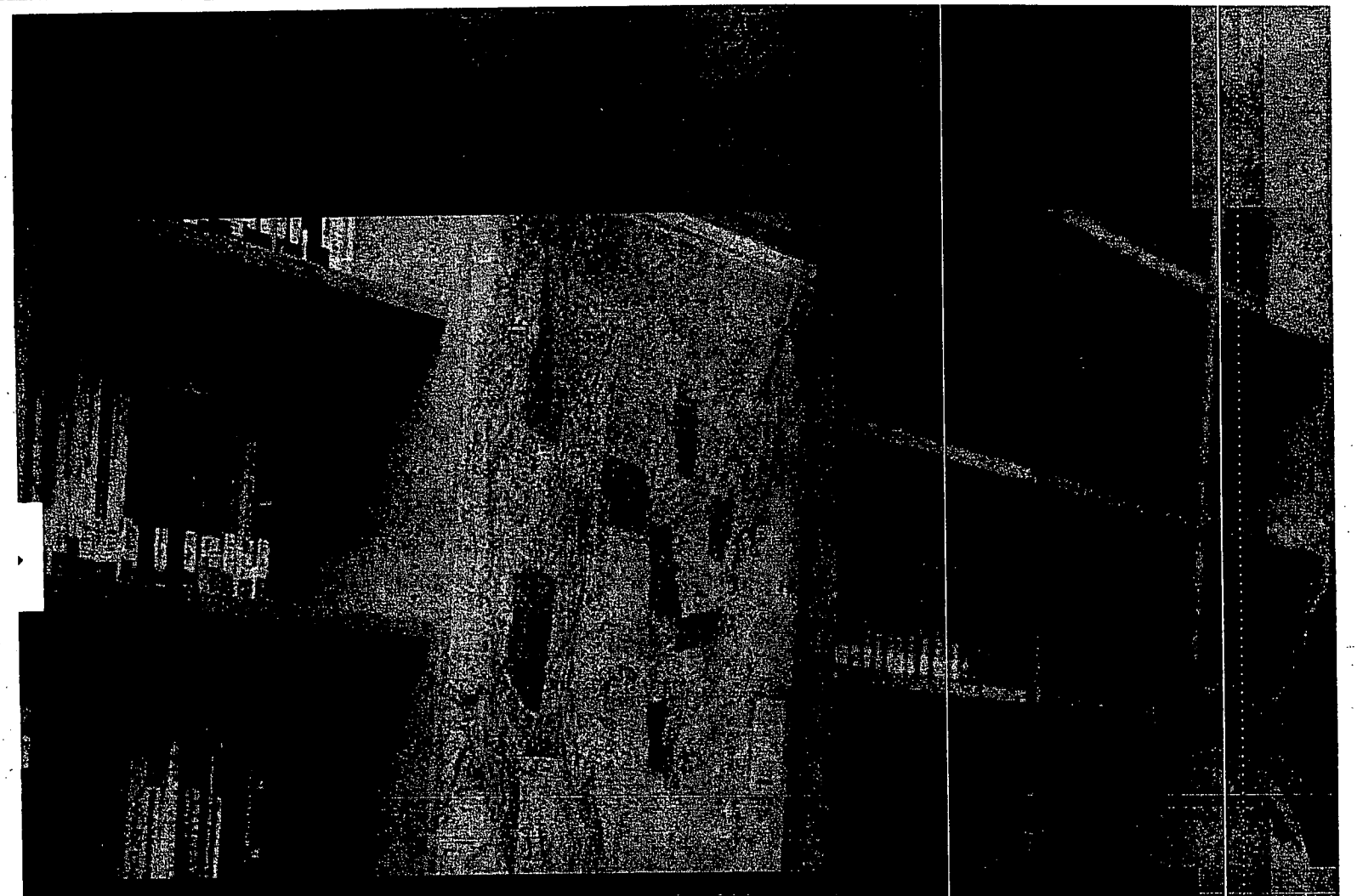
Westwood College	Low	Median	High
Program Awaiting Graduates†	$45,094‡	$58,864‡	$73,840‡
Average Graduate's Entry Salary	EXPERIENCED Paralegals and Legal Assistants		
	Annual Wage		

*Graduates without experience in the field will likely start in entry-level positions. Position titles and responsibilities may vary by hiring company.

†Based upon Westwood College graduates from July 1, 2009 through June 30, 2010 and California Employment Development Department Salary Data.

‡Job Code 23.2011.00 Source: http://www.labormarketinfo.edd.ca.gov/

§State and local restrictions may apply. Additional training may be required.



Our campuses

[illegible]

Anaheim
Inland Empire (Upland)
South Bay (Torrance)
Los Angeles

[illegible]

DuPage (Woodridge)
O'Hare Airport (Chicago)
River Oaks (Calumet City)
Chicago Loop

[illegible]

Denver North
Denver South

[illegible]

Annandale Satellite
Arlington Ballston

[illegible]

Atlanta Northlake
Atlanta Midtown

Not all programs are available at all campuses.

westwood.edu | 800-875-6050

If you are currently a high school student,
please call 800-284-3128 or visit go.westwood.edu

In California, for accrediting purposes, Westwood College – Inland Empire Arrow is a satellite campus of Westwood College – Inland Empire (Upland, CA), a branch of Westwood College – Denver North (Denver, CO); Westwood College – Anaheim (Anaheim, CA), Westwood College – Denver South (Denver, CO) and Westwood College – Houston South (Houston, TX) are also branches of Westwood College – Denver North (Denver, CO) and are all accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC) and the Accrediting Council for Independent Colleges and Schools (ACICS). Westwood College – Annandale (Annandale, VA) and Westwood College – Arlington Ballston (Arlington, VA), are branches of Westwood College – South Bay (Torrance, CA) and have been certified to operate in Virginia by the State Council of Higher Education for Virginia (SCHEV). Westwood College – Chicago Loop (Chicago, IL), Westwood College – River Oaks (Calumet City, IL), and Westwood College – Online (Denver, CO) are branches of Westwood College – Los Angeles (Los Angeles, CA). Westwood College – Fort Worth (Fort Worth, TX) and Westwood College – Atlanta Midtown (Atlanta, GA) are branches of Westwood College – DuPage (Woodridge, IL). Westwood College – Dallas (Dallas, TX) and Westwood College – Atlanta Northlake (Atlanta, GA) are branches of Westwood College – O'Hare Airport (Chicago, IL) and are all accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). Westwood is not currently enrolling students at its Texas campuses. Westwood College – Online is approved to award associate, bachelor's, and master's degrees by the Colorado Department of Higher Education. All degrees conferred by Westwood College – Online are in accordance with the Colorado statutes and regulated by the Colorado Department of Higher Education. Students enrolling in Westwood College – Online are enrolled under the Colorado Department of Higher Education's requirements. Westwood College – Online will respond to all requests initiated by prospective students for information about online programs. All students, regardless of their state of origin, will receive the same protections as Colorado state residents. Westwood College – Online is not regulated under Chapter 132 of the Texas Education Code. Westwood College – Online is nationally accredited by the accrediting Council for Independent Colleges and Schools (ACICS). Not all programs available at all campuses. © 2011 Alta Colleges, Inc.

CALIFORNIA: Anaheim - 1551 S. Douglass Road, Anaheim, CA 92806 Inland Empire - 20 West 7th Street, Upland, CA 91786 South Bay - 19700 S. Vermont Ave., #100, Torrance, CA 90502 Los Angeles - 3250 Wilshire Blvd., Suite 400, Los Angeles, CA 90010. COLORADO: Denver North - 7350 N. Broadway, Denver, CO 80221 Denver South - 3150 S. Sheridan Blvd., Denver, CO 80227 Denver North Online Programs - 10249 Church Ranch Way, Broomfield, CO 80021 GEORGIA: Atlanta Northlake (Blake) - 2303 Parklake Drive, Suite 175, Atlanta, GA 30345 Atlanta Midtown - 1100 Spring Street, Suite 102, Atlanta, GA 30309 ILLINOIS: DuPage - 7155 Janes Avenue, Woodridge, IL 60517 Chicago Loop - 1 N. State Street, Suite 1000, Chicago, IL 60602 O'Hare Airport - 8501 W. Higgins Road, Suite 100, Chicago, IL 60631 River Oaks - 80 River Oaks Dr., Suite #D-49, Calumet City, IL 60409 VIRGINIA: Annandale - 7619 Little River Turnpike, Suite 100, Annandale, VA 22003-2602 Arlington Ballston - 4420 Fairfax Drive, Arlington, VA 22203

WCK-1012-11/11 3.5

Exhibit 2

ASSURANCE SECTION

REPORT OF A COMPREHENSIVE EVALUATION VISIT
FOR
Initial Accreditation

TO

Westwood College
Denver, Colorado

May 4 – June 10, 2009

FOR

The Higher Learning Commission
A Commission of the North Central Association of Colleges and Schools

EVALUATION TEAM

Dr. Laurie Becvar, Dean of the Graduate School and Division of Continuing and Distance Education, University of South Dakota, Vermillion, SD 57069

Dr. Stephanie Bulger, Vice Chancellor, Center for Distance Education & Learning Technologies, Wayne County Community College District, Detroit, MI 48226

Ms. Karen Fraser, Assistant Director of Information Technology/Academic Computing, Hendrix College, Conway, AR 72032

Dr. Freda Hartman, Dean, John Sperling School of Business, University of Phoenix, Phoenix, AZ 85040

Dr. Leah S. Harvey, Professor, Mathematics and Statistics, Metropolitan State University, St. Paul, MN 55106

Dr. Patricia Ryan, Director, Institutional Research, Southeast Missouri State University, Cape Girardeau, MO 63701

Dr. James Smith, Vice Chancellor for Academic Affairs, Ivy Tech Community College of Indiana, Bloomington, IN 47404

Dr. Daniel Wright, Dean of Science & Communication, Pima County Community College District, Tucson, AZ 85709

Dr. Ben Yohe, Director of General Education, The Art Institute of Colorado, Denver, CO 80203

Dr. Jerry Gallentine, University President, National American University, Rapid City, SD 57701, Team Chair

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I. CONTEXT AND NATURE OF VISIT

A. Purpose of Visit

The purpose of the visit to Westwood College was to conduct a comprehensive visit for initial accreditation and to review the institution's request for the removal of the stipulation on distance education degrees.

B. Organizational Context

Westwood College (WC) is a private, for-profit institution focused on career education at the undergraduate and graduate levels. WC traces its beginnings to the Radio and Television Repair Institute in Denver, Colorado in 1953. The curriculum was expanded into electronics and the institute changed its name in 1958 to National Electronics Institute (NEI). Program expansion continued through the succeeding decades and in 1987 James Turner and Kirk Reidenger acquired the institution then called Denver Institute of Technology (DIT). In 1997 the institution's name was again changed to Westwood College of Technology and in 2004 it became Westwood College.

Westwood College, Inc. is a Colorado entity incorporated as of November 14, 2006, as a wholly owned subsidiary of Alta Colleges, Inc. As presently constituted, Westwood College consists of a central administration, 17 ground campuses in six states and one online campus. The 17 physical sites are dispersed across the United States, while the online campus and central administration offices are located in Denver. The college offers 32 undergraduate programs and 1 graduate program enrolling approximately 16,500 students as of October 2008, an increase from 4,771 students in October 2002.

The college offers programming in business, design, technology, healthcare, criminal justice and industrial services through diploma, associate, bachelors and masters of business administration degrees.

A review of the institution's bylaws, adopted April 10, 2007, validated the purpose for which the institution exists—to offer undergraduate and graduate students high quality, career-focused programs which provide them with the knowledge, skills, and credentials to launch, enhance, and change careers. The recent employment rate for graduates who were seeking employment is a testament to Westwood's ability to meet its core mission. An overall employment rate of 79% is good in these challenging economic times.

The Denver campuses, online delivery campus and the central administration offices were visited May 4-6, 2009 and every other campus was visited by assigned two-person teams during the period of June 1-3 and/or June 8-10, 2009.

C. Unique Aspects of Visit

After the normal period for receipt of third party comments had ended, additional complaints were received by the commission and shared with the team. These complaints were received by the team after the initial visit to the central administrative offices, distance learning campus and the Denver campuses in May 2009.

The college's response to the five negative third-party comments received by the Commission during the normal comment deadline were reviewed with the team at the end of

its May visit. The college responded to all 14 negative third-party comments in a written submission that was reviewed with the team chair and another consultant evaluator prior to the end of the visits in June.

A conference call was held with the team and commission liaison officer and Director of Legal and Governmental Affairs. This discussion was held after the visits in early May to the Denver locations and prior to the rest of the campus visits that occurred June 1-10, 2009. The discussion focused on the team's need to investigate these additional complaints as they relate to the institution's capacity to meet eligibility requirements or criteria for accreditation.

At the time of the conference call, the complaints were described as allegations related to (a) deceptive or incomplete institutional information related to cost of attendance, the ability to transfer credits and the role of accreditation, (b) fraudulent handling of student aid programs, alternative loan programs or interest rates related to such programs, failing to have students sign promissory notes, applying for additional loans on the student's behalf without appropriate consent from the student, (c) the credentials, role and expertise of admissions representatives and/or (d) quality of instruction by faculty and the rigor of the curriculum.

As the sequential visits moved forward, the two-person teams paid careful attention to all aspects of their visit, but especially to the issues raised above. This special attention on the part of all teams included random phone conference calls with students, random "in-the-hall" interviews with students, faculty and staff members, unannounced or unscheduled reviews of student complaint logs and audit of faculty credentials at each campus, review by evaluators of randomly selected student files and faculty files.

The results of the sequential visits, including the team's assessment of allegations identified above are integrated into the text of the report as related accreditation criteria are discussed.

D. Sites or Branch Campuses Visited

All physical sites and campuses were reviewed via sequential visits during the months of May and June 2009. The campuses and dates visited are listed below:

Team Assigned	Locations	Date
-Dr. Ben Yohe -Dr. Pat Ryan	▪ 7350 N. Broadway St., Denver, CO	May 5, 2009
-Ms. Karen Fraser -Dr. Daniel Wright	▪ 3150 S. Meridian Blvd., Denver, CO	May 5, 2009
-Dr. Daniel Craig Wright -Dr. Laurie Becvar	▪ 1551 S. Douglass Rd., Anaheim, CA ▪ 20 W. 7th St., Upland, CA ▪ 19700 S. Vermont Ave. #100, Torrance, CA ▪ 3250 Wilshire Blvd., 4th Fl., Los Angeles, CA	June 1-3, 2009
-Dr. Ben Yohe -Dr. Pat Ryan	▪ 2309 Parklake Dr. NE, Bldg. 10, Atlanta, GA ▪ 1100 Spring St. NW, Ste. 102, Atlanta, GA	June 1 & 2, 2009
-Dr. Pat Ryan -Dr. James Smith	▪ 7155 Janes Ave., Woodridge, IL ▪ 17 N. State St., Ste. 300, Chicago, IL ▪ 8501 W. Higgins Rd., Ste. 100, Chicago, IL ▪ 80 River Oaks Dr., Ste. D-111, Calumet City, IL	June 8-10, 2009
-Dr. Freda Hartman -Dr. Stephanie Bulger	▪ 7619 Little River Turnpike, 5th Fl., Annandale, VA ▪ 4300 Wilson Blvd., Ste. 200, Arlington, VA	June 8 & 9, 2009
-Dr. Leah Harvey -Dr. Jerry Gallentine	▪ 8390 LBJ Freeway, Exec. Cntr. 1, Ste. 100, Dallas, TX ▪ 4232 N. Freeway, Ft. Worth, TX ▪ 7322 SW Freeway, #110, Houston, TX	June 8 & 9, 2009

Exhibit 3

The Higher Learning Commission
NCA

230 South LaSalle Street, Suite 7-500 | Chicago, IL 60604-1413
800.621.7440 | Fax: 312.263.7462 | info@hlcommission.org | ncahlc.org

Serving the common good by assuring and enhancing the quality of higher learning

October 5, 2010

Mr. George Burnett, President
Westwood College
2000 S. Colorado Blvd.
Suite 800, Tower 2
Denver, CO 80222

Dear President Burnett:

The Commission has learned that Westwood College is at risk of revocation of its Certificate of Approval from the Texas Workforce Commission for its site in Dallas, Texas. In addition, Westwood College is also at risk for non-renewal of its application for Certificates of Approval for its sites in Houston, Fort Worth and Broomfield, Texas. The Commission has further learned that Westwood College has received a cease and desist order from the Wisconsin Educational Approval Board for its on-line division and may have lost approval for its on-line division in Texas. In addition, the Commission has learned that the Denver- North campus has been placed on probation by the Accrediting Commission of Career Schools and Colleges (ACCSC). Finally, the Commission has learned that Westwood College, or its parent entity, is under investigation by at least two state attorneys general and that several lawsuits have been filed against the institution regarding its educational practices.

Commission policy 9.2(a) requires that if another institutional accrediting body takes an adverse or probationary action against the institution after the institution receives status with the Commission, the Commission will undertake a prompt review to determine whether Commission action, including withdrawal, is appropriate. In addition, Commission policy 9.4 requires that the Commission take into consideration denial or withdrawal of status or sanction placed by another accrediting agency or a state issuance of a pending or final action that affects the institution's legal status or authority to award degrees. Finally, institutions in candidacy are required to continue to meet all the Eligibility Requirements including Eligibility Requirement #1, which requires that an institution maintain its legal authority to award degrees and other educational offerings wherever and however those offerings are delivered.

In compliance with its policies, the Commission must proceed to investigate these actions by states and other accreditors. Therefore I now require that you file a report no later than November 1 identifying the institution's or the parent company's status, or the

status of any site, in each state where the institution has physical locations. This report should indicate whether the institution, its parent or any site has degree-granting approval in good standing. The institution must disclose whether there have been any actions by any state to non-renew or revoke such approval. This report should also address the institution's status with any other recognized accrediting agency that accredits any of the institution's campuses or programs. The institution must disclose whether there have been any actions by the accreditor to withdraw status or to implement an order of show-cause or to place the institution on probation. The report must include supporting current documentation from each state and accreditor confirming good standing or outlining the reasons for any adverse action, sanction or show-cause. The report must include any investigative reports from any state or other relevant documents.

In addition, I am asking that you provide a complete list of all lawsuits filed against the institution, a brief summary of the claims by the complainants, the status of the suit, and its case number and jurisdiction.

The Commission will examine the documentation and determine whether to implement a process to reconsider the institution's candidate for accreditation status. As you know, the Commission is also reviewing the information you submitted in reference to the findings of the General Accountability Office (GAO). The Commission will also consider the outcome of this Commission review in determining whether to initiate a reconsideration process with regard to the institution's candidate for accreditation status.

Effective October 5, the institution's Statement of Affiliation Status (enclosed) will carry a note that indicates that the institution is at risk for loss of state approval for its sites in Texas and has received a cease and desist order for its on-line division from Wisconsin. This note will remain on the SAS until the institution has fully satisfied the concerns of those states and is in good standing.

Sincerely,

Karen L. Solinski (cfc)

Karen L. Solinski
Vice President for Legal and Governmental Affairs

cc: Mary B. Breslin, B.V.M., Vice President for Accreditation Relations

Enclosure

STATEMENT OF AFFILIATION STATUS

WESTWOOD COLLEGE
2000 S. Colorado Blvd. Suite 800, Tower 2
Denver, CO 80222

Affiliation Status: Candidate: 2007

PEAQ PARTICIPANT

Nature of Organization

Legal Status:	Private FP
Degrees Awarded:	A, B, M

Conditions of Affiliation:

Stipulations on Affiliation Status:	Programs at the masters level are limited to the MBA offered on-line and at the Los Angeles-Wilshire campus. The institution will provide the Commission with advance notice before a program is introduced at a new location.
Approval of New Additional Locations:	Prior Commission approval required.
Approval of Distance and Correspondence Courses and Programs:	New Commission policy on institutional change became effective July 1, 2010. Some aspects of the change processes affecting distance delivered courses and programs are still being finalized. This entry will be updated in early 2011 to reflect current policy. In the meantime, see the Commission's Web site for information on seeking approval of distance education courses and programs.
Reports Required:	Progress Report: 06/30/2011; A report on the development of graduate education.
Other Visits Scheduled:	None.

Summary of Commission Review

Year of Last Comprehensive Evaluation:	2008 - 2009
Year for Next Comprehensive Evaluation:	2011 - 2012
Date of Last Action:	02/17/2010

Accreditation Notes:

* Westwood College is at risk for loss of state approval for its sites in Texas and has received a cease-and-desist order for its online division from Wisconsin.

Exhibit 4

WESTWOOD COLLEGE®

A PLACE WHERE YOU CAN SUCCEED®

November 1, 2010

Dr. Sylvia Manning
President
The Higher Learning Commission of
North Central Association of Colleges and Schools
230 South LaSalle Street, Suite 7-500
Chicago, IL 60604-1413

smanning@hlcommission.org

RECEIVED
NOV - 2 2010

VIA E-MAIL AND OVERNIGHT MAIL

Re: Westwood College

Dear Dr. Manning:

I am writing to inform you of the decision of the Westwood College Board of Trustees to voluntarily resign, without prejudice and effective immediately, Westwood College's affiliation (candidacy) with the Higher Learning Commission. A copy of the Resolution adopted by the Board of Trustees is attached for your reference.

We voluntarily resign despite being in good standing and after making significant improvements over nearly six years of working collaboratively with the Commission. The decision to voluntarily resign our affiliation was made after concluding that, in the current environment, it is unlikely that Westwood College can receive a fair and impartial evaluation for initial accreditation. For instance, the Commission's new rules, "*Minimum Expectations within the Criteria for Accreditation*", appear to allow disqualification of candidates without providing a fair opportunity to cure deficiencies. Also, the Commission's other recent changes in procedures, policies and approaches evidence a bias against private sector colleges, and appear to have been influenced by external forces and information outside the accreditation process. Accordingly, Westwood College believes it unlikely the Commission will evaluate Westwood College for initial accreditation in a manner consistent with the criteria for which we sought and achieved candidacy.

The latest peer-consultant site team performed a comprehensive review of Westwood College's candidacy in May and June 2009. During the exit session, the team communicated to the leadership of Westwood College that the College was ready for accreditation by the Higher Learning Commission, and that the team would make that recommendation to the Commission. We were later told by our highly experienced Team Chair that he and the site team were directed to change their report to recommend continued candidacy. I understood through subsequent conversations with the Commission's administrative staff that the Commission leadership could not support a recommendation for accreditation of Westwood College, despite the findings and

recommendation of the site team. In an effort to show that we valued our relationship with the Commission, we chose not to dispute this outcome even though we believed the continued candidacy decision was unjustified by the facts. It seems that this was the first of several experiences that now lead us to believe that the Commission is no longer living up to its long and impressive history of "promoting flexibility in accrediting processes that utilize peer review in new and creative ways and serve higher education's diverse stakeholders." We are no longer sure that the Commission can—or will—provide a fair and objective peer-review process for our next comprehensive evaluation.

In addition, Commission policy states the "staff liaison serves as the primary resource person to that organization as well as the organization's liaison with the Commission." It is our observation that the role of the staff liaison has been reduced to the point where liaisons often do not know the direction the Commission is taking toward individual institutions. Repeatedly, Westwood College communicated with—and accepted advice from—its liaison only to find that people in key leadership roles within the Commission apparently operated on judgments uninformed by our interactions with our staff liaison. Most recently, our staff liaison even informed us that she could not have a telephone call with our Provost and me without having the Commission's general counsel join her. We have observed that the tone and actions of the key leaders of the Commission staff communicate an inherent lack of support for our mission and model of higher education.

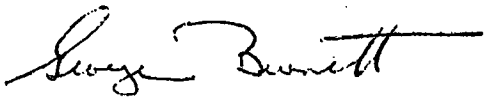
Finally, the Commission has historically taken an approach of thoroughly investigating allegations and rumors about institutions prior to taking punitive public acts or making public comments. However after the Government Accountability Office issued a report alleging misconduct on the part of 15 educational institutions, the Commission on August 13, 2010 issued its "Statement on Marketing Practices at For-Profit Institutions." In this public statement, the Commission said "The Commission applauds governmental exposure of deviation from ethical practice as well as fraud and abuse. Such governmental action forms a basis upon which the Commission may act with regard to its criteria for institutional integrity." (Emphasis added.) The Commission seems to have established a pretext to act on the basis of allegations and media reports. While the Commission asked Westwood College on August 12 (the day before its public statement) and October 5 to provide explanations of these issues, the Commission's requests appear pro forma given the preemptory judgments evidenced in the Commission's public statement. As the Commission evidently creates new reporting and decision-making processes to prove its responsiveness to the highly charged and confrontational atmosphere that has permeated higher education over the last eighteen months, due process seems to no longer be the guiding principle of Commission policy.

So, greatly disappointed by the change in tone, processes and policies of the Commission, Westwood College reluctantly resigns its affiliation. Westwood College has concluded that there are other accrediting agencies that are more appropriate for it and its mission. These accrediting agencies, all recognized by the Department of Education, have tough but fair standards, are still committed to peer review, have transparent processes, and, crucial to our decision, provide traditional and private sector colleges with the same objective process for evaluation.

Our Provost will be in contact with the Commission staff to discuss any remaining issues with regard to the resignation of our affiliation.

Please do not hesitate to contact me if you have any questions, or need additional information.

Sincerely,



George A. Burnett
System President & CEO
Westwood College

cc: Karen Solinski
Dr. Mary Breslin
Dr. David Harpool, Provost, Westwood College
William M. Ojile, Jr., Chief Legal & Compliance Officer, Westwood College

Westwood College Board of Trustees
Resolution

WHEREAS, in 2005 Westwood College ("the College") submitted its Preliminary Information Form ("PIF") to the Higher Learning Commission of the North Central Association of Colleges and Schools ("HLC") as the first step in the process of obtaining initial accreditation from HLC; and,

WHEREAS, HLC approved the PIF in February 2006, and the College was scheduled for its candidacy visit in May and June 2007; and,

WHEREAS, HLC granted the College candidacy in October 2007; and,

WHEREAS, the College submitted its self-study in support of initial accreditation in March 2009, and a HLC peer-consultant site team performed a comprehensive review of the College in May and June 2009; and,

WHEREAS, while the HLC team initially informed the College's administration that it would recommend initial accreditation to the Commission, the College's administration later learned through subsequent conversations with the Commission's administrative staff that a recommendation for accreditation of the College could not be supported by Commission leadership; and,

WHEREAS, in March 2010 HLC formally informed the College that the Commission had approved continuation of Westwood's candidacy for initial accreditation; and,

WHEREAS, the College has been informed by HLC to expect its next visit in the initial accreditation process in fall 2012; and,

WHEREAS, the College believes that HLC's recent changes in procedures, policies and approaches make it unlikely that the College can receive a fair and impartial evaluation for initial accreditation by HLC.

NOW THEREFORE BE IT RESOLVED, that the Board of Trustees of the College has determined that the best interests of the College require that the College to voluntarily resign, without prejudice, its affiliation (candidacy) with HLC; and,

FURTHER RESOLVED, that the Officers of the College are authorized to take all such action and to execute all such documents as such officer deems necessary or desirable to carry out the intent of the foregoing Resolution; and,

FURTHER RESOLVED, that this Resolution will be executed in counterparts and will be effective when executed by all the Trustees; and,

FURTHER RESOLVED, that all actions taken by the Trustees and the Officers of the College prior to the date of this Resolution that are within the authority conferred

hereby are ratified and approved.

SECRETARY'S CERTIFICATION

The Board of Trustees of Westwood College, Inc. approved this Resolution.

William M. Ojile, Jr.
Secretary

Exhibit 5

Higher Learning Commission
NCA

230 South LaSalle Street, Suite 7-500 | Chicago, IL 60604-1413
800.621.7440 | Fax: 312.263.7462 | info@hlcommission.org | ncahlc.org

Serving the common good by assuring and enhancing the quality of higher learning

November 6, 2010

Mr. George Burnett, President
Westwood College
2000 S. Colorado Blvd.
Suite 800, Tower 2
Denver, CO 80222

Dear President Burnett:

I am writing in response to your letter of November 1 voluntarily withdrawing Westwood College ("Westwood" or "the College") from candidate for accreditation status with the Higher Learning Commission. On behalf of the Commission I accept your withdrawal. November 1, 2010, will be the effective the date of the withdrawal in the Commission's records. I am attaching a Public Disclosure Notice that the Commission will post by the close of business today providing updated information to the public about your status.

Your letter also makes a number of statements to which I feel that I must respond. When the Commission reviewed Westwood in 2009 for initial accreditation that process resulted in an action for continued candidacy. The team that conducted the evaluation identified in its final report a number of substantive issues that indicated the institution was not yet in compliance with the Criteria for Accreditation, which is required before the Commission can accredit an institution. You had an opportunity to file a substantive response disputing the findings of the team or raising any concerns regarding procedural issues. Moreover, you had an opportunity to request a hearing with a Commission Review Committee that conducts a review of a team's findings and its recommendation for continued candidacy. You did not request such a hearing, and you took no significant issue with any of the team's findings in your written response. In fact, your written response to that team report indicates you generally agreed with all the findings of the team. The College's experience in finding that, after only two years of candidacy at the time of the team visit, the institution had not yet achieved compliance with the Criteria is, in fact, a very common experience for applying institutions.

You describe the Commission's requests for information on August 12 and October 5, regarding, respectively, the institution's recruiting and admission processes and its authorization by states in which it has activities as "pro forma" and indicate that

you do not believe the Commission would have conducted a fair review of this information. However, you had previously indicated in a September 13 letter to the Commission, in reference to another accrediting agency that had issued a sanction to Westwood based in part on student recruitment and admissions practices, that the other agency had not engaged in the "kind of thorough, deliberative process that the Commission has afforded the College." As the Commission received the information in response to the October 5 letter only on Monday evening and is still in the process of reviewing the information submitted in response to the August 12 letter, your conclusion that the review process for this information is unfair seems premature, unfounded, and at sharp variance from your previous comments regarding the Commission's process.

Finally, I will note that your conclusion that the Commission would not evaluate Westwood College fairly and impartially for its upcoming evaluation for initial accreditation is also premature and not supported by any evidence. The Commission has never attempted to discourage Westwood from seeking initial accreditation at the time of the next comprehensive evaluation. The Commission has provided assistance and counsel to the institution in making the improvements necessary for the institution to be prepared appropriately for that visit and to be able to document its compliance with the Criteria for Accreditation, as it does with other applying institutions.

Thank you for the notification.

Sincerely,

Sylvia Manning

Sylvia Manning
President

Enclosure

cc: Mary B. Breslin, B.V.M, Vice President for Accreditation Relations

Exhibit 6

Patch Collectors Click Here

Police Officer

Chicago Police Department
3510 S. Michigan Avenue
Chicago, Illinois 60653
312-743-1060
e-mail
recruitment@chicagopolice.org
www.cityofchicago.org/personnel

Starting Salary: $36,984 per year
Population: 2,994,100
Sworn Officers: 13,400
Applications Deadline: **11/01/03**

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Police Office Examination Announcement
Grade D1 - Examination #C9161-0001-2003

THE FIRST STEP in the Chicago Police Officer examination process is a written examination. Information regarding administration of the written examination will be available when applications are accepted. NOTE: Only a percentage of those applicants taking the written examination will be eligible to participate in additional steps of the hiring process.

MINIMUM QUALIFICATIONS

AGE: Applicants must have reached their 21st birthday by November 1, 2003. Proof of age MUST be provided at the time of application. NOTE: Pursuant to the Municipal Code of Chicago, no person may be appointed as a probationary police officer after their 40th birthday.

DRIVER'S LICENSE: Applicants MUST present a valid driver's license at the time of application.

EDUCATION/MILITARY SERVICE: Applicants must have at least 60 semester (or 90 quarter) hours of credit, prior to January 31, 2004, from a college or university accredited by one of the six regional accrediting bodies responsible for evaluating two and four year institutions that grant Associate's and Bachelor's degrees. Colleges and universities in Illinois are accredited by the North Central Association of Colleges and Schools. Also acceptable are applicants who have completed four years of continuous active duty in the armed forces of the United States. Applicants must provide proof that they meet the education requirement or military service requirement at the time they are called for further processing.

RESIDENCY: Residency in the City of Chicago is required of all employees. Proof of residency will be required at the time of employment.

APPLICATION INFORMATION

Applications are AVAILABLE from October 10, 2003 through October 31, 2003 at all Chicago Public Library branches. Applications will NOT be accepted at these locations. Applications will also be available at the application sites listed below during the specified application acceptance

periods.

Applications will be ACCEPTED ONLY from Monday, October 20, 2003 through Saturday, November 1, 2003, excluding Sunday, at the locations listed below. All locations will be open Monday through Friday from 9:00 a.m. to 4:30 p.m. and on Saturdays from 9:00 a.m. to 3:00 p.m. ALL APPLICANTS MUST COME IN PERSON to submit their application and receive their test admission ticket, a briefing guide and information sheet. Proxies will be allowed under limited circumstances such as military duty. For information on proxies, call the Department of Personnel at (312)744-4976.

Daley College, 7500 S. Pulaski Rd.
Olive-Harvey College, 10001 S. Woodlawn Ave.

Harold Washington College, 30 E. Lake St.
Wright College, 4300 N. Narragansett Ave.

An internet application will be available at www.cityofchicago.org/personnel from October 20 through November 1, 2003.

Note: Applications will also be available and accepted at the Chicago Police Recruitment Day, October 18, 2003, held at the Chicago Police Department's Timothy J. O'Connor Education and Training Division, 1300 W. Jackson Blvd., Between 10:00 a.m. and 2:00 p.m.

APPLICATION FEE: $20.00 per application. The fee payment will be collected when the application is submitted. ONLY CASH WILL BE ACCEPTED. NO REFUNDS WILL BE GIVEN TO ANYONE UNDER ANY CIRCUMSTANCES. Paying the fee does NOT guarantee passing this examination or being offered employment with the City of Chicago. This fee is required by the Municipal Code of Chicago 2-74-020, and is charged to help pay the costs of this examination. If you are presently receiving unemployment compensation, supplemental security income or general assistance, or your income is below the federally-defined poverty level, you can call (312)744-4976 to find out what documents you must provide to qualify for a fee waiver. Fee waivers will be available only at the Chicago Police Recruitment Day on October 18, 2003, and at Harold Washington College during the October 20 to November 1, 2003 application period.

EXAMINATION DATES

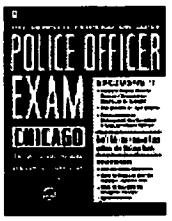
The examination will be administered on Saturday, November 22, 2003. You will be randomly assigned a time and seat (morning or afternoon session) at the time you submit your application. NO RESCHEDULES WILL BE PERMITTED.

THE HIRING PROCESS

Applicants notified for further processing must pass a Background Investigation, Medical Examination, Psychological Test, Drug Screen and Physical Fitness Test and other pre-employment procedures as determined by the Chicago Police Department.

POLICE OFFICER JOB DUTIES

Police Officer Exam: Chicago



Police Officer Exam
Learning Express E...
Best Price $50.00
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Privacy Information

2003 Starting Salary: $36,984 per year

DUTIES: Police Officers, as part of and empowered by the community, protect the lives, property and rights of all people, maintain order, and enforce the law impartially. They work in partnership with the community to respond to crime and neighborhood disorder. They work various shifts and days as assigned, patrolling an assigned beat by vehicle and/or on foot in order to observe conditions, intervene in observed situations that require their attention, and provide a visible presence to prevent crime from occurring. Police Officers respond to a variety of assignments such as crimes in progress, accidents, damage to property and domestic and other disturbances. They may have to deal with unruly persons and overcome forceful resistance. They protect crime scenes until detectives or superiors arrive; examine the scene for evidence; and question suspects, victims and witnesses in order to gather information. Under Chicago's Alternative Policing Strategy (CAPS), Police Officers participate in and conduct neighborhood meetings to identify community concerns, and work with supervisors and peers to analyze crime patterns and develop responses to criminal activity in an area.

Police Officers respond to a variety of emergencies and must pursue suspects on foot over a variety of terrain and obstacles. Police Officers prepare reports, recording all details of an incident; prepare arrest slips to start the booking procedure; and testify in court. Police Officers must possess the ability to physically apprehend and control suspects and to safely discharge firearms to protect citizens and/or themselves. They perform a wide variety of other tasks such as directing pedestrian or vehicular traffic, issuing traffic citations and assisting sick and injured persons in a variety of ways. They perform all other related duties as required and directed in order to serve citizens by enforcing laws and protecting lives and property.

SPECIAL NOTES

All references to political sponsorship or recommendation must be omitted from any and all application materials submitted for City employment.

Falsification or omission of information may subject you to disqualification and/or termination of employment, and may be punishable as perjury as well as a violation of the Municipal Code of Chicago 2-74-095, which provides for a fine of up to $500.

Applicants who wish to apply for Veteran's Preference must submit a completed Veteran's Preference Request Form to the Department of Personnel by November 28, 2003. Forms will be available at the time of application and at the test site.

Any person appointed to the position of Police Officer with the City of Chicago will be required to maintain the ability needed to perform the essential duties of a Police Officer or will be subject to dismissal from the service of the City of Chicago according to the rules.

The Municipal Code of Chicago 2-152-150 prohibits the hiring of anyone who owes any debt to the City of Chicago. Any fees, fines, taxes or other debts owed to the City must be reconciled prior to further processing.

Any person appointed to the position of Police Officer with the City of

Chicago will be subject to the provisions of the Municipal Code of Chicago, specifically Section 2-252-340 which requires all employees in the classified career service of the City of Chicago to be actual residents of the City of Chicago. Employees who fail to comply with the provision will be subject to dismissal from the service of the City of Chicago according to the rules.

AT ANY TIME DURING THIS EXAMINATION PROCESS OR DURING THE LIFE OF THE ELIGIBLE LIST, THE DEPARTMENT OF PERSONNEL AND THE CHICAGO POLICE DEPARTMENT RESERVE THE RIGHT TO MODIFY THE EXAMINATION, THE TEST SCHEDULE AND/OR IMPOSE ANY ADDITIONAL TESTS, STANDARDS OR QUALIFICATIONS DEEMED APPROPRIATE TO EVALUATE APPLICANTS FOR THIS POSITION.

For further information or updates about this announcement, please call Ernst & Young at (312) 474-0175.

NOTE: If you are disabled and require a reasonable accommodation to file your application or to take the written examination, please contact the City of Chicago, Department of Personnel, at (312)744-4976 or TTY(312)744-2563, by October 31, 2003. You will be required to provide certain information regarding your request which must be submitted no later than November 3, 2003.

This examination announcement is NOT an offer of employment. Completion of any step or all steps in the Police Officer examination process or being placed on an eligible list does not guarantee employment and does not create any contractual rights or obligations. DISQUALIFICATION OF AN APPLICANT AT ANY STEP IN THIS SELECTION PROCESS WILL RESULT IN THEIR REMOVAL FROM FURTHER CONSIDERATION.

THE CITY OF CHICAGO IS AN EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

Return to the Featured Department List

13081

Exhibit 7

CITY OF CHICAGO
Richard M. Daley
Mayor

Department of Personnel
Jacqueline P. King
Acting Commissioner

POLICE OFFICER EXAMINATION ANNOUNCEMENT

Grade D1 - Examination #C9161-0002-2006

THE FIRST STEP in the Chicago Police Officer examination process is a written examination. Information regarding administration of the written examination will be available when applications are accepted. NOTE: Only a percentage of those applicants taking the written examination will be eligible to participate in additional steps of the hiring process. **Applicants will not be allowed to sit for the examination more than once in a 12 month period from the time of initial testing. If applicants sit for the examination more than once during that time period, only the first test score will be accepted.**

MINIMUM QUALIFICATIONS

AGE: Applicants must have reached their 21st birthday by June 30, 2006. Proof of age MUST be provided at the time of application. **NOTE:** Pursuant to the Municipal Code of Chicago, no person may be appointed as a probationary police officer after their 40th birthday.

DRIVER'S LICENSE: Applicants MUST present a valid driver's license at the time of application.

EDUCATION/MILITARY SERVICE: Applicants must have at least 60 semester (or 90 quarter) hours of credit, prior to August 31, 2006, from a college or university accredited by one of the six regional accrediting bodies responsible for evaluating two and four year institutions that grant Associate's and Bachelor's degrees. Colleges and universities in Illinois are accredited by the North Central Association of Colleges and Schools. Also acceptable are applicants who have completed four years of continuous active duty in the armed forces of the United States, or applicants who have completed 30 semester (or 45 quarter) hours from a college or university accredited by one of the six regional accrediting bodies responsible for evaluating two and four year institutions that grant Associate's and Bachelor's degrees and one year of continuous active duty in the armed forces of the United States. Applicants must provide proof that they meet the education requirement and/or military service requirement at the time they are called for further processing.

RESIDENCY: Residency in the City of Chicago is required of all employees. Proof of residency will be required at the time of employment.

APPLICATION INFORMATION

Paper applications are AVAILABLE from June 8 through June 24, 2006 at all Chicago Public Library branches. Applications will NOT be accepted at these locations. Applications will also be available during the specified application acceptance period at the application sites below and on-line at www.cityofchicago.org/humanresources

APPLY FOR AND PAY YOUR FEE ON-LINE AT www.cityofchicago.org/humanresources

Paper applications will be ACCEPTED ONLY from Monday, June 12, 2006 through Monday, June 26, 2006, excluding Sundays, at the locations listed below. All locations will be open Monday through Friday, 9:00 a.m. to 3:00 p.m. and Saturdays 9:00 a.m. to 12:00 p.m. Applicants who submit their applications in person will be given a briefing guide and test administration information sheet. On-line applicants must down-load and print their briefing guide and test administration information sheet from the web site at the time of application. Proxies for paper applications will be allowed under limited circumstances such as military duty. For information on proxies, call the Department of Human Resources at (312)744-4976.

Daley College **7500 S. Pulaski Rd.**	**Malcolm X College** **1900 W. Van Buren St.**	**Wright College** **4300 N. Narragansett Ave.**

Note: Applications will also be available and accepted at the Chicago Police Recruitment Day, Wednesday, June 14, 2006, held at the Chicago Police Department's Timothy J. O'Connor Education and Training Division, 1300 W. Jackson Blvd., between 6:00 p.m. and 9:00 p.m.

APPLICATION FEE: $20.00 per application. The fee payment will be collected when the application is submitted. The fee payment for on-line applications will be collected at the test site on the day of testing. CASH ONLY WILL BE ACCEPTED. NO REFUNDS WILL BE GIVEN TO ANYONE UNDER ANY CIRCUMSTANCES. Paying the fee does NOT guarantee passing this examination or being offered employment with the City of Chicago. This fee is required by the Municipal Code of Chicago 2-74-020, and is charged to help defray the costs of this examination. If you are presently receiving unemployment compensation, supplemental security income or general assistance, or your income is below the federally-defined poverty level, you can call (312)744-4976 to find out what documents you must provide to qualify for a fee waiver. **Fee waivers will be available only at the Chicago Police Recruitment Day on June 14, 2006, and at Malcolm X College during the June 12 through June 26, 2006 application period.**

EXAMINATION DATES

The examination will be administered on Saturday, August 5, 2006 and/or Sunday, August 6, 2006. You will be randomly assigned a date, time (morning or afternoon session) and seat. A notice to report will be mailed to you regarding where and when to report for testing. On-line applicants will be given the option of receiving their notice to report by e-mail or US Postal Service. NO RESCHEDULES WILL BE PERMITTED.

(continued on back side)
THE CITY OF CHICAGO IS AN EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER

HIRING PROCESS

Applicants notified for further processing must pass a Background Investigation, Medical Examination, Psychological Test, Drug Screen and Physical Fitness Test and other pre-employment procedures as determined by the Chicago Police Department.

POLICE OFFICER JOB DUTIES

2006 Starting Salary: $42,258 per year
DUTIES: Police Officers, as part of and empowered by the community, protect the lives, property and rights of all people, maintain order, and enforce the law impartially. They work in partnership with the community to respond to crime and neighborhood disorder. They work various shifts and days as assigned, patrolling an assigned beat by vehicle and/or on foot in order to observe conditions, intervene in observed situations that require their attention, and provide a visible presence to prevent crime from occurring. Police Officers respond to a variety of assignments such as crimes in progress, accidents, damage to property and domestic and other disturbances. They may have to deal with unruly persons and overcome forceful resistance. They protect crime scenes until detectives or superiors arrive; examine the scene for evidence; and question suspects, victims and witnesses in order to gather information. Under Chicago's Alternative Policing Strategy (CAPS), Police Officers participate in and conduct neighborhood meetings to identify community concerns, and work with supervisors and peers to analyze crime patterns and develop responses to criminal activity in an area.

Police Officers respond to a variety of emergencies and must pursue suspects on foot over a variety of terrain and obstacles. Police Officers prepare reports, recording all details of an incident; prepare arrest slips to start the booking procedure; and testify in court. Police Officers must possess the ability to physically apprehend and control suspects and to safely discharge firearms to protect citizens and/or themselves. They perform a wide variety of other tasks such as directing pedestrian or vehicular traffic, issuing traffic citations and assisting sick and injured persons in a variety of ways. They perform all other related duties as required and directed in order to serve citizens by enforcing laws and protecting lives and property.

SPECIAL NOTES

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Falsification or omission of information may subject you to disqualification and/or termination of employment, and may be punishable as perjury as well as a violation of the Municipal Code of Chicago 2-74-095, which provides for a fine of up to $500.

Applicants who wish to apply for Veteran's Preference must complete a Veteran's Preference Request Form. The Request Form and required documentation must be received by the Department of Human Resources by August 14, 2006. Forms will be available at the time of application and at the test site. It is recommended that you submit your completed Request Form and required documentation at the test site.

Any person appointed to the position of Police Officer with the City of Chicago will be required to maintain the ability needed to perform the essential duties of a Police Officer or will be subject to dismissal from the service of the City of Chicago according to the rules.

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Any person appointed to the position of Police Officer with the City of Chicago will be subject to the provisions of the Municipal Code of Chicago, specifically Section 2-252-340 which requires all employees in the classified career service of the City of Chicago to be actual residents of the city of Chicago. Employees who fail to comply with the provision will be subject to dismissal from the service of the City of Chicago according to the rules.

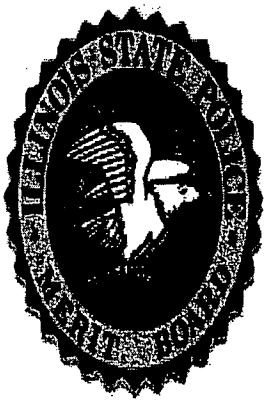
AT ANY TIME DURING THIS EXAMINATION PROCESS OR DURING THE LIFE OF THE ELIGIBLE LIST, THE DEPARTMENT OF HUMAN RESOURCES AND THE CHICAGO POLICE DEPARTMENT RESERVE THE RIGHT TO MODIFY THE EXAMINATION, THE TEST SCHEDULE AND/OR IMPOSE ANY ADDITIONAL TESTS, STANDARDS OR QUALIFICATIONS DEEMED APPROPRIATE TO EVALUATE APPLICANTS FOR THIS POSITION.

For further information or updates about this announcement, please call Ernst & Young at (312) 474-0175.

NOTE: If you are disabled and require a reasonable accommodation to file your application or to take the written examination, please contact the City of Chicago, Department of Human Resources, at (312)744-4976 or TTY(312)744-2563. by June 26, 2006. You will be required to provide information regarding your request which must be submitted no later than June 27, 2006.

This examination announcement is NOT an offer of employment. Completion of any step or all steps in the Police Officer examination process or being placed on an eligible list does not guarantee employment and does not create any contractual rights or obligations. DISQUALIFICATION OF AN APPLICANT AT ANY STEP IN THIS SELECTION PROCESS WILL RESULT IN THEIR REMOVAL FROM FURTHER CONSIDERATION.

Exhibit 8



Illinois State Police Merit Board

531 Sangamon Ave. East
Springfield, IL 62702

Pat Quinn, Governor

MENU
- Home
- About Us
- Recruitment/Selection
  - Pre-Employment Requirements
  - Recruitment Cycle Dates
  - Recruitment Process
  - Selection Process
  - Online Application
  - Vision Standards
  - Fitness Test
  - FAQ
- Promotion
- Discipline
- Board
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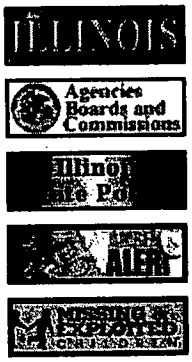

Pre-Employment Requirements

The Illinois State Police Merit Board has set the following minimum requirements for persons applying for an Illinois State Trooper position:

1. **An applicant must be at least twenty-one (21) years of age. (An applicant twenty (20) years of age may apply if the Option 4 education requirement is successfully met.)**
2. **An applicant cannot have been convicted of a felony.**
3. **An applicant must be a citizen of the United States.**
4. **An applicant must possess a valid driver's license at the time of completing the application.**
5. **An applicant must be willing to accept an assignment anywhere in the State.**
6. **An applicant must have completed, with a C average or better, one of the following education requirements:**

Option 1)	An Associate of Arts Degree or equivalent course work* **AND** meet one of the following two job experience requirements: 3 consecutive years of continuous, full time service, as a police officer, with the same police agency OR three consecutive years of active military duty.
Option 2)	An Associate of Science Degree or equivalent course work* **AND** meet one of the following two job experience requirements: 3 consecutive years of continuous, full time service, as a police officer, with the same police agency OR three consecutive years of active military duty.
Option 3)	An Associate of Applied Science Degree, **ONLY** if the degree is in Law Enforcement/Criminal Justice **AND** meet one of the following two job experience requirements: 3 consecutive years of continuous, full time service, as a police officer, with the same police agency OR three consecutive years of active military duty.
Option 4)	A Bachelor's Degree

Fallen

SECURED BY GeoTrust click to verify 22-Oct-11 00:04 GMT

Educational Requirements

Requirements must be met *by the date of the test*

Do you have three consecutive years of continuous, full time service as a police officer with the same police agency?

OR

three consecutive years of active military duty?

Yes → **You must have at least an Associate of Arts (AA) or equivalent coursework*, an Associate of Science (AS) or equivalent coursework*, or an Associate of Applied Science (AAS)****

*See coursework equivalent list below.
**AAS degrees must be in Criminal Justice/LawEnforcement

No → You must have a Bachelor's Degree (BA or BS) or higher (Masters or Doctorate)

* The equivalent course work option must meet the following criteria:
9 semester hours in Communication studies
9 semester hours in Social Science studies
6 semester hours in Natural Science studies
3 semester hours in Math studies
9 semester hours in Humanities studies
24 semester hours in other electives

Please note: the college or university must be accredited by one of the following associations:

Middle States Association of Colleges and Schools
North Central Association of Colleges and Schools
New England Association of Schools and Colleges
Northwest Association of Schools and Colleges
Southern Association of Colleges and Schools
Western Association of Schools and College

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The Illinois State Police Merit Board is an Equal Opportunity Employer

Exhibit 9

From:
To:
Subject:

Sent: Aug 31, 2011 12:11:22 PM

--- On **Mon, 4/27/09, J. Cassidy (Staff, Westwood College - CHL Campus)** ***<sender@edline.net>*** wrote:

From: J. Cassidy (Staff, Westwood College - CHL Campus) <sender@edline.net>
Subject: Town Hall Meetings Tuesday & Wednesday this week
To: "Undisclosed Recipients" <thomasihudson@yahoo.com>
Date: Monday, April 27, 2009, 6:01 PM

Dear CHL Community,

Over 175 students, staff and faculty joined us for the autumn Town Hall Meetings.

We hope to see you at one of the three Town Hall Meetings over the next two days.

Come let your voice be heard and hear exciting updates about the next steps in Westwood's candidacy for regional accreditation.

Tuesday, 4/28 11:30 a.m. - 12:30 p.m.
or Tuesday 4/28 4:30 p.m. - 5:30 p.m.
or Wednesday 4/29 11:30 a.m. - 12:30 p.m.

in the Student Lounge. We will provide Harold's chicken. Hope to see you there!

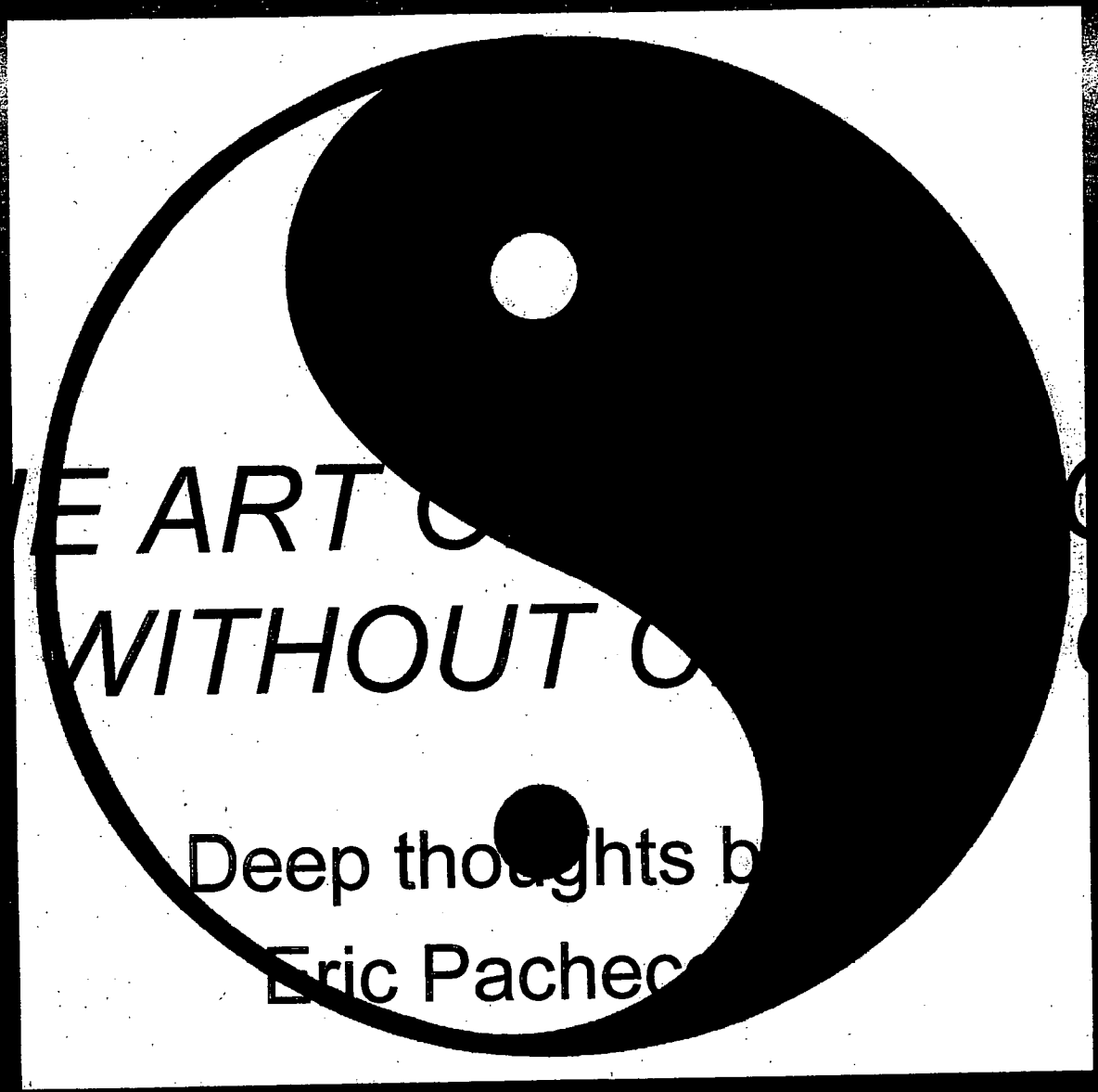
The sender of this email is not accepting any replies so any reply will not reach the sender.

You have received this e-mail because this address was registered at www.edline.com
If you do not wish to receive any emails, please use this link to unsubscribe:
http://www.edline.net/Un.page?uid=23sm0ZHNvbkB5YWhvby5jb210aG9tYXNpaHU

Edline Email

This message was archived by the CA Message Manager.

Exhibit 10


E ART
WITHOUT
Deep thoughts b
Eric Pachec

The Intro…..Close?

- Introduce yourself and state reason for calling
- Letter of Commitment
- Get student to talk. Talk about degree, talk about hobbies…just get him/her to talk.

Close # 1 (building credibility)

- Share vital points of Westwood
  - Accreditation
  - History (1953)
  - Ground campuses- Not just an online school
  - Recommendation (reiterate importance)

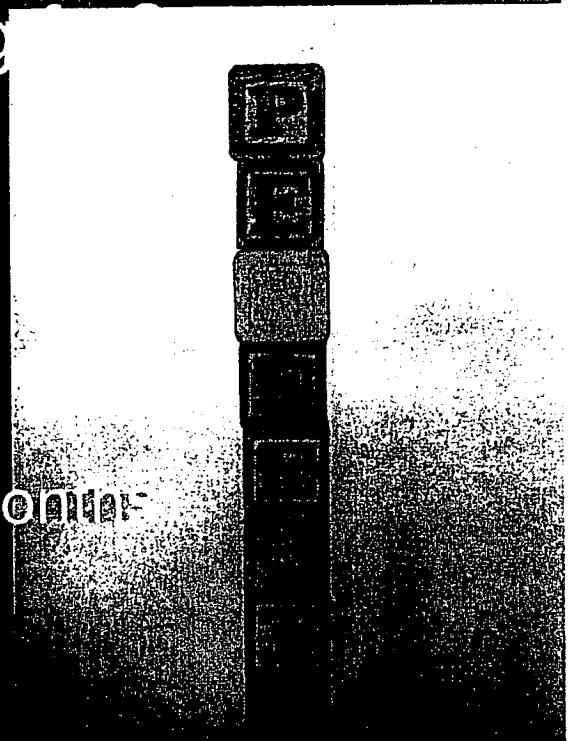
Building the Dream

Let Student Dominate The Conversation!!!!

- Why _____? (Program choice)
- Where will this get you (Look into the future)
- Will this benefit you immediately?
- How long have you…..?
- What prevented you in th
- PAINT THE PICTURE!!!!!
- Always dig deeper through why and how ?'s

Close # 2(Westwood is the perfect school)

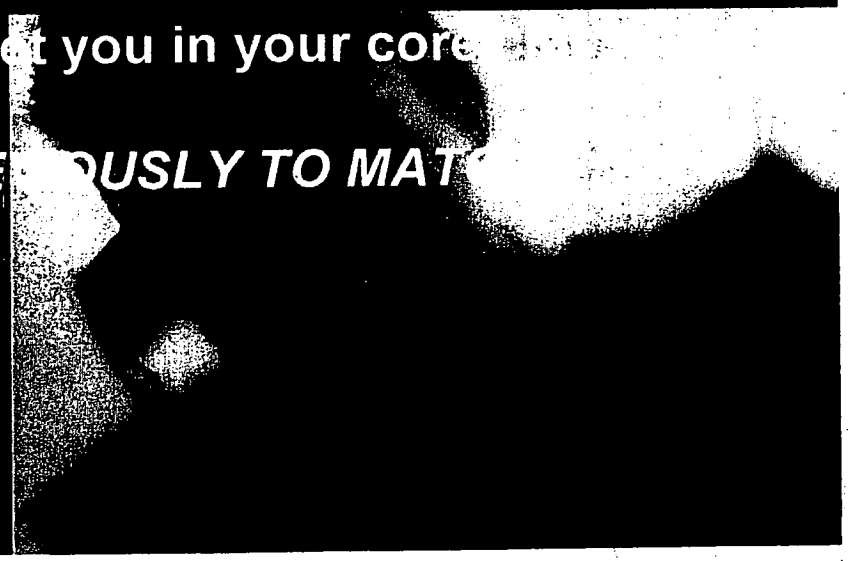
- Ask, don't tell…what are they looking



  - Flexibility?
  - Virtual Classroom environment?
  - Learn at the "peak learning times"?
  - Career focused curriculum?
  - Accelerated Degree? (graduate in 36 months)
  - Career Development Assistance?
  - Alumni retraining? (tuition free)
  - Support team that is here to help them be successful? <u>YOU</u> are the success coach!

Close # 3 Benefit Sharing

- Match the needs/wants of the student to Westwood
  - **Flexible classroom environment!**
  - **Classroom "feel" with online flexibility! (Classroom interaction, text books, audio/video lectures, discussion boards)**
  - **Open book testing!!!!!!!!!!**
  - **Teachers with real world experience…they not only teach it…but actively practice it.**
  - **Career focused curriculum…we get you in your core immediately**
  - ***USE WHAT YOU GATHERED PREVIOUSLY TO MATCH STUDENT TO THE SCHOOL!!!!!!***



Trial Closes...unlocks concerns!

- Does the online format we offer fit your needs? HOW?
- Does the curriculum we offer fit what you're looking for? HOW?
- To this point do we match what you look for in what ways?
- Review conversation up to this point
- Review what still needs to be covered. (FA, Recommendation)

Close # 4 Covering Tuition

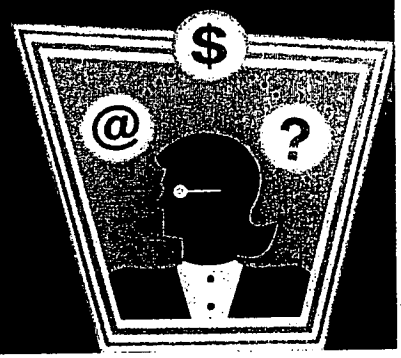
- Keep it simple….break down by term
  - Books/software charged at the beginning of the term (est. $100-$250.00 per term depending on program)
  - Tuition charged at the end of term (est. $3915.00 for full time students)
  - Total investment will be about $4200.00 per term (full time students)
  - EVERYTHING is charged to a student account that we set up for you…you don't pay for books/software out of pocket (identify pain point and dig). Financial aid assists with paying student account for books/software and tuition
  - $100.00 one time application/registration fee. (Refund $75.00 if they are not accepted into our program.)

Close #5 Financial Aid

- You are not a Financial Aid expert…don't pretend to be
- Break it down into 4 steps (Grants, Stafford, Sallie Mae, Westwood)
- Grants-Gravy money
- Stafford-deferred payments
- Sallie Mae-co-x, private loan, MANY options
- Westwood-Cover remaining balance $150.00 payments. Only option you HAVE to pay back monthly while in school

Another Trial Close

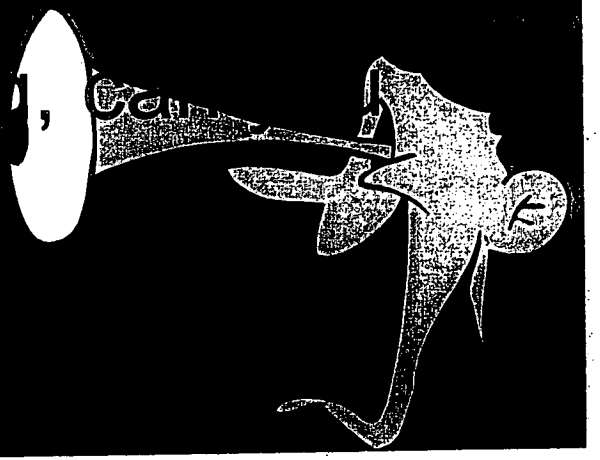
- Do you see that Westwood can help make this affordable and obtainable financially through our financial aid process?
- Recap: Cover key selling points unique to student
  - Address concerns (student concerns and your concerns) at this time if any.
  - Answer any remaining questions student may have
  - TIME TO CHANGE A LIFE!!!!!!



Close the enrollment, open a new beginning!

- [illegible] want to be accepted [illegible]
- [illegible]

"Let's get your application [illegible]



Verbiage

- I need you to grab a pen and paper so I can create a user name and password for you to electronically sign your enrollment documents! While I generate this, please go to www.westwoodonline.edu, let me know when you are there. I am going to ask you some questions…these are important as they will go on your official transcripts with the school. Also, how were you going to take care of your application fee: Credit Card, Debit Card or Check? (SHUT UP AND LET THE STUDENT TALK)

In "CLOSE"-ing

- Walk through EA while on the phone, inform of DA lock within 24 hours, instruct to check email for FA link. You will FOLLOW UP with them within 24 hours to assist with FA and check on approval of recommendation from DA.
- Ask again for questions……time to get them to start!

- THANK YOU!!!!!

Exhibit 11

Admissions Training & Development

232W: The Psychology of the Phone Script and Seven-Step Interview

Understanding the Interview and Integrating the Interview Guide

WESTWOOD COLLEGE®

Module

- Use the Interview Guide to effectively close more prospects
- Identify Drivers and leverage them to effectively close your prospects
- Develop and understand how to ask second level questions to better engage your prospect
- Increase the probability student will sell themselves to attend college

Phone

- It is all about communication!
- Build rapport
- Help prospect feel comfortable
- Allow prospect to remind themselves as to why they requested information in the first place
- Gain insight as to why the prospect is looking to go to college online

Section

- **Allows us to distinguish our self from the competition**
- **Get the student thinking: *"That is exactly what I am looking for!"***
- **Introduces the question "*What else are you looking for in a college?"***
- **Identifies key features/benefits that are important to the student**
  - Ask second level questions here: "*Why are those important to you?"* or "*How would that benefit you?"*

- **Introduces key factors to address later in the interview**
  - Are you currently employed?
    - Financial independence
  - What is your current work schedule?
    - Introduces possible time constraints
  - Who is supporting you in your decision to attend College?
    - Identify support group and possible buying committee

Prior College?

- This can open up many Drivers (i.e. fear, desire etc.)
- Ask second level probing questions such as:
  - Why didn't you finish your degree?
  - Tell me more about that?
  - Was it a campus or online college?
- It is key NOT to sell to the student here; simply gather the information so you can reference later on in the interview

Phone Sc

- Do not go away from the "scripted" questions of this section
- Avoid selling the product
- Avoid being the "fixer upper"

Step One

- Introduce Career Assessment
- About Westwood College
- Westwood College Mission
- Westwood College Locations
- Accreditation

Step One

- **Introduce Career Assessment**
  - Sets foundation and shares importance of the interview process
- **About Westwood College**
- **Westwood College Mission**
- **Westwood College Locations**
- **Accreditation**

Step One

- **Introduce Career Assessment**
- **About Westwood College**
  - Provides a summary of our career focused education
- **Westwood College Mission**
- **Westwood College Locations**
- **Accreditation**

Step [illegible]

- **Introduce Career Assessment**
- **About Westwood College**
- **Westwood College Mission**
  - Shows Prospect that we are focused on their success
- **Westwood College Locations**
- **Accreditation**

Step [illegible]

- **Introduce Career Assessment**
- **About Westwood College**
- **Westwood College Mission**
- **Westwood College Locations**
  - Allows prospect to see we are a legitimate institution
- **Accreditation**

Step 3/14

- **Introduce Career Assessment**
- **About Westwood College**
- **Westwood College Mission**
- **Westwood College Locations**
- **Accreditation**
  - Build credibility – it is very important to explain what accreditation means and why it is essential

Step One (How)

- Be sincere
- Ask question then listen, then listen some more
- Listen instead of "waiting for your turn to speak"
- Follow the 80/20 rule
- Listen for opportunities to probe and ask second/third level questions to gain a deeper understanding of your prospect

- **Commitment Takes an Investment from You**
  - **Time Investment**
  - **Financial Investment**
  - **Emotional Investment**
- **You are setting expectations of what it takes to be a college student in addition to sharing three specific commitments the student will be making. All three of these you will continue to reference throughout your interview**

Step Two

- Must have rapport built. If student doesn't believe in you and follow what you are saying then the expectations are meaningless!
- Make sure the prospect understands the importance of the expectations being sent
- Get the prospects "buy-in" on the expectations set

Step Two

- Be clear with the expectations being set
- Don't talk "to" the student but instead talk "with" the student
- Have student repeat back to you
- Have student explain how they will meet the expectations set

Step

- Gain an in-depth understanding of your prospect to determine:
  - Program
  - Challenges
  - Motivation
  - Financing
- No selling here

Step Three

- **Program Choice:**
  - Create motivation through fear or failure
    - Why aren't you in your desired field currently?
    - What are some things you like or dislike about your current jobs?
  - You want to have prospect think about why they are doing the same thing over and over again, and not getting different results

Challenges:

- Build urgency through this section
  - How long have you been looking to go back to school?
  - What prevented you from furthering your education in the past?
- Ask second level questions such as:
  - How does that make you feel?
  - So you see education as a way of rectifying that? In what ways?

Step three

- **Financial Support:**
  - Solidify buying committee and create a solution on how to cover not only tuition, but the application fee as well
    - Who is encouraging you to go back to school?
      - Support person and buying committee?
    - Who else have you talked to about going to school now?
      - Possible co-borrowers and support group
    - Tell me about your credit history?
      - Help determine FA eligibility but equally important identify a means to pay the application fee

Motivation:

- Build a dream for long term as well as create a fear of "nothing will change" now if they do not go to school
  - Why do you want to continue your education, how will it impact your future?
  - What are you looking for in a college? What should it provide for your success?
    - If they already answered this question earlier in your interview use this as an opportunity to further explore drivers

Step [illegible]
Effective [illegible]

- Learn about your prospect!
- Take detailed notes, highlight Drivers when you hear them
- Ask second level questions to clarify and better understand your prospect
- Follow the 80/20 rule
- This part of the interview is where you should focus the majority of your time

- **It's important you give details relating to the benefits of a career focused education**
  - Conversation should be 50/50
  - Match our benefits to what they mentioned to you earlier. For example, "Coursework is laid out in a step by step structure from basic to advanced skills. You mentioned you struggled in college the first time because you felt overwhelmed by the classes and didn't feel "smart" enough. Do you see how this style of education will able you to overcome those previous obstacles?
  - Don't forget to ask Trial Close Question: Do you see the Benefits of a Career Focused Education?

Step Fo[illegible] and Prog[illegible]

- Use information you gathered from Profile section to aid you
- Make sure the information you present is what they are interested in-you have to know what is important to them and match the benefit- do "temperature checks"
- Continuously check for understanding with prospect so to ensure you are both on the same page

Step Five

- Keep it simple
- Do not pretend to be an expert
- Check for understanding throughout presentation
  - Does that make sense? How many terms do we have? How much is the estimated cost per term?
- Refer to Financial Aid walkthrough for more tips

Step Five: the Financial

- Do not data dump
- Be confident at ALL times
- Increase energy and enthusiasm – Financial Aid is Easy and Affordable
- Use fun quizzes to check for understanding of Financial Aid, Application Fee, FA expectations
  - So, (prospect), tell me; how many steps will you be completing during our Financial Aid process?
  - How much money should you expect to receive in Grant money?

Step Six

- Focus on the benefits that are important to the prospect
- Allow the prospect to visualize and sell themselves on the Westwood Difference
- Cover everything but go into specific focus on what the student shared is important to them from earlier in the interview

Step Six: Differentiate

- Overview conversation using verbiage from student to "sell" the difference and how it's unique to that specific prospect
- Get the student to tell you, again, why this is a good fit and why they will be successful here- you want to have student talk about drivers, dreams, goals

Step [illegible]

- **Summary Close**
  - Using the students own words you want to answer the bullet points as listed in the guide
- **Review Commitment from student**
  - Get the student to re-commit one final time before application
- **Takeaway (if applicable)**
- **Assumptive Close**
  - Builds confidence in prospect and gets them on "high note" before asking for application fee

Step Seven

- Confidence, Confidence, Confidence
- Student should be selling you on why they should attend school here through effective use of previous six steps
- Find your "niche" and go with it-there is no one "right way"
- Ultimately, the most successful are those who have the student completely sell themselves

Exhibit 12

WESTWOOD COLLEGE OF TECHNOLOGY

2005 Student Budget for Full-Time Day School Programs

Associate and Bachelor Degrees

1 BEFORE REGISTRATION

Application Fee	$25
Registration Fee	$75
Total (Submitted along with Application for Admissions.)	$100

$100

2 ESTIMATED MONTHLY LIVING EXPENSES

Estimated Monthly Living Expenses

Monthly Payment per student* (includes rent, furniture rental, utilities)	$350 - $559
Transportation / Food / Personal Expenses	$200 - $300
Total Estimated Monthly Indirect Educational Investment	$550 - $859

550-859

3 TIME MANAGEMENT BUDGET

Managing Monthly Expenses through Student Self-Help

A COMBINATION FOR SUCCESS

WESTWOOD Commitment
- Academic needs
- Part time employment
- Housing assistance
- Process financial aid

Parent / Family support
- Assist with financial aid
- Support channel for student
- Contact Westwood staff for assistance

WESTWOOD College of Technology GRADUATE!

Student responsibilities
- Living expenses
- Good study habits
- Ask for assistance if needed
- Stay focused

Hours per week	168
Academic hours	-24
Remaining hours	144
Part-time job	-(25 - 30)
Remaining hours	119 - 114
Sleep (8 hours/night)*	-56
Remaining hours	63 - 58
Extra study + lab time	-15
Personal time	48 - 43
Approximate wages per hour	$7.00 - $8.00
Part-time hours per week	x 25 - 30
Weekly income	$175.00 - $240.00
Average Monthly Income	$700.00 - $960.00

$700-$960 PART TIME

4 TUITION, TOOL KIT, BOOKS, SUPPLIES, AND MISCELLANEOUS EXPENSES

Your Educational Investment

Tuition – per term* (after initial $100)	$ 3915
Books and Supplies – per term*	$ 350
Course Materials*	$ —
Lab Fee – per term*	$ —
Total Estimated Direct Educational Investment *	$ 4265

5 PAYMENT OPTIONS

Financing Your Educational Investment

A	☐ Full Payment per term*	Approximate Payment	$4,300
B	☐ Percentage Payment Plan (20 or 36 payments @ 0% interest)*	Approximate Payment	$1,770
C	☐ Personalized Financial Plan	1st Academic yr. Estimated Monthly Contribution without PLUS (Only applies if borrower(s) is not PLUS eligible or is PLUS eligible and has been denied.)	$ 900
	☑ Dependent Student ☐ Independent Student	Estimated Monthly Contribution with PLUS	$ 190 MO

6 FIRST TERM START-UP FUNDS

Start-Up Funds Needed Upon Arrival

Rent (1-2 months)	$
Living Expenses (4-6 weeks)	$
Personal/Miscellaneous	$
Total Estimated Start-Up Funds	$

*Based on current costs

0612

11/05/04

2005 Student Budget for Full-Time Day School Programs

Associate and Bachelor Degrees

Suggested Family Contribution Chart

Total Family Income	Dependent Student 2-3	Dependent Student 4-5	Dependent Student 6+	Independent Student 1-2	Independent Student 3+
0 - 12,000	110 - 150	105 - 120	105	105 - 115	105
12,001 - 16,000	140 - 180	110 - 150	105 - 115	140 - 180	105 - 115
16,001 - 20,000	205 - 245	175 - 215	110 - 150	175 - 215	105 - 115
20,001 - 24,000	270 - 310	240 - 280	175 - 215	205 - 245	105 - 115
24,001 - 28,000	330 - 370	305 - 345	240 - 280	340 - 380	100 - 120
28,001 - 30,000	400 - 440	365 - 405	305 - 345	340 - 380	100 - 120
30,001 - 32,000	465 - 505	430 - 470	365 - 405	340 - 380	100 - 120
32,001 - 34,000	530 - 570	495 - 535	430 - 470	340 - 380	110 - 130
34,001 - 36,000	595 - 635	560 - 600	495 - 535	340 - 380	340 - 380
36,001 - 38,000	660 - 700	630 - 670	560 - 600	340 - 380	340 - 380
38,001 - 40,000	725 - 765	680 - 720	630 - 670	340 - 380	340 - 380
40,001 - 42,000	780 - 820	755 - 805	680 - 720	340 - 380	340 - 380
42,001 - 44,000	855 - 895	825 - 865	755 - 795	340 - 380	340 - 380
44,000 - Above	900	900	900	340 - 380	340 - 380

/ contribution is based on family's reported information. Only applies if borrower(s) is not PLUS eligible or is PLUS eligible and has been denied.

Estimated Federal PLUS Loan Payment	
Gross Amount Borrowed	120 Payments (10 years)
$ 4,000	$ 50.67
$ 5,000	$ 63.34
$ 6,000	$ 76.01
$ 7,000	$ 88.67
$ 8,000	$101.34
$ 9,000	$114.01
$10,000	$126.68
$11,000	$139.34
$12,000	$152.01
$13,000	$164.68
$14,000	$177.35
$15,000	$190.01

[illegible] st caps at 9.0%. Borrowing additional amounts will result in higher payments.

Exhibit 13

Google

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www.utexas.edu › World › Web US Higher Education
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... Central provides links to other **regionally-accredited institutions** of higher learning ... credit at UT Austin, and for inclusion in the Web U.S. Higher Education **lists**. ... accredits **institutions** in Arizona, Arkansas, Colorado, **Illinois**, Indiana, Iowa, ...

The Higher Learning Commission - Home
www.ncahlc.org/
Higher Learning Commission of the North Central Association of **Colleges** and **Schools**. ... Alphabetical Document **List**. Site Documents ... The coming months will bring some significant changes in the **accreditation** relationship. ... Higher Learning Commission • 230 South LaSalle Street, Suite 7-500 • Chicago, **IL** 60604 ...

Regional Accreditation for Online Schools - The 6 Regional ...
distancelearn.about.com/od/**accreditationinfo**/a/regional.htm
To determine whether or not an online school is **regionally accredited**, find out which ... Accredits **schools** in Arizona, Arkansas, Colorado, **Illinois**, Indiana, Iowa, ...

College Accreditation in the United States-- Pg 7
www2.ed.gov/admins/finaid/accred/**accreditation**_pg7.html
Here you will find **lists** of regional and national accrediting agencies recognized by the U.S. Secretary ... National Association of **Schools** of Dance, Commission on Accreditation ... Chicago, **Illinois** 60610-4714 ..... practical nursing programs not located in a **regionally accredited college** or university may use accreditation by ...

CHEA: Directory of Regional Accrediting Organizations (2011-2012)
www.chea.org/Directories/regional.asp
Middle States Association of **Colleges** and **Schools** (MSA) ... Recognized by the Council for Higher Education **Accreditation**, April 2002 ... Degree granting **institutions** incorporated in Arizona, Arkansas, Colorado, **Illinois**, Indiana, Iowa, Kansas, ...

Regional accreditation - Wikipedia, the free encyclopedia
en.wikipedia.org/wiki/Regional_**accreditation**
Contents. 1 **List** of regional accreditors; 2 History; 3 Regional accreditation vs. national ... **Regionally accredited** higher education **institutions** are predominantly ...

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regionally accredited college/universities that accept nationally ...
online.degree.net › › Online Degree Discussions › Online Degree Chat
Aug 15, 2007 – Though it might be a good idea to start a **list of regionally accredited** .... City **Colleges** of Chicago Harold Washington **College** Chicago, **IL** 77. ...

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Exhibit 14

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3 Year Degree, 4 Chicago Locations. Get Criminal Justice Program Info.

Illinois State Police Trooper Physical Fitness Test
www.isp.state.il.us/employ/fitness.cfm
Practical exercise performance **requirements** are physical activities related to **law enforcement** tasks. The following practical exercise performance **requirements** ...

[PDF] **Have never been convicted - Illinois State Police**
www.isp.state.il.us/docs/1-191.pdf
File Format: PDF/Adobe Acrobat
Willing to accept assignment anywhere in the **state**. ... Associates of Applied Science-**Law Enforcement** ... Meet one of the following experience **requirements**: ...

FAQs - Illinois State Police
www.isp.state.il.us/foid/firearmsfaq.cfm
A FOID application can be downloaded from the **Illinois State Police** website at ... In 2007, the legislature amended the **requirements** for FOID applications. ...

Illinois State Police Academy Local Training
www.isp.state.il.us/academy/localtraining.cfm
10+ items -- The applicant **needs** to be employed by a city **police** or county ...
Breath Alcohol Training **Illinois Law** ...
Illinois State Police Canine Training - Dual Purpose Dog **Illinois Law** ...

Illinois State Police Merit Board - Pre-Employment Requirements
www.illinoistrooper.com/requirements.html
May 11, 2010 – The **Illinois State Police** Merit Board has set the following minimum **requirements** for persons applying for an Illinois State Trooper position ...

Illinois State Police - The Blue Line
www.theblueline.com/archive/ISP.html
The monthly newsletter of police career opportunities. ... **Illinois State Police** ... You MUST meet our standard **requirements** before being considered for Fast ...

Illinois State Police Officer Requirements
www.criminaljusticedegreeschools.com/**state requirements** state/illi ...
A description of the physical, education, and personal **requirements** for employment with the **Illinois State Police**.

Welcome to the Illinois Law Enforcement Training and Standards ...
www.ptb.state.il.us/
These certified courses are offered by MTUs and Basic Law Enforcement ... Northern District of Illinois, U.S. Department of Justice, and the **Illinois State Police**, ... avoid constitutional **requirements** establishing real law enforcement authority for ...

Fingerprint Criminal Background Checks, Teacher Ed Requirements ...
teacheredcenter.**illinoisstate**.edu/**requirements**/.../index.shtml
Teacher Education **Requirements**. Fingerprint Criminal Background Checks. You must have a completed FBI/**Illinois State Police** fingerprint criminal background ...

Frequently Asked Questions - CyberDrive Illinois
www.cyberdriveillinois.com/departments/**police**/faq.html
What is the Mission of the **Illinois** Secretary of **State Police**? ... with coursework in **law enforcement**, criminal justice, law, government or related field is **required** ...

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