

Supplemental Complaint

Exhibit Index

Deposition Transcripts

Order	Deponent
1	Mark Brown
2	Diane Auer Jones
3	James Manning
4	Colleen Nevin

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Interrogatory Responses & Related Documents

Order	Document
1	Supplemental Interrogatory Responses
2	Interrogatory 17-18: How to Review a Borrower Allegation in a One-off or Small Batch Application
3	Interrogatory 17-18: ITT Memo, April 2020
4	Interrogatory 17-18: ITT Program Cost Memo, May 2020
5	Interrogatory 17-18: ITT Educational Services Memo, May 2020
6	Interrogatory 17-18 Evidence Considered Memo

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Bates Stamped Documents

Documents appear in this order, with Bates-Numbered Slip-Sheets Between them. The documents are cited **by Bates Number** in the Supplemental Complaint.

Order	Bates Range	Document Title / Identifier
1.	DOE00000196-DOE0000213	Everest/Wyotech Transfer of Credits Memo
2.	DOE00000584-DOE0000603	Borrower Defense to Repayment Claims Evaluation
3.	DOE00002144-DOE00002147	"Manning Memo"
4.	DOE00002342	Submissions by Attorneys General Seeking Relief for Constituents
5.	DOE00002528-DOE00002529	Charlotte School of Law Memo
6.	DOE00002653	School Notice Letters and Other Open Items
7.	DOE00003427-	Next Gen FSA Key Actions
8.	DOE00004316-DOE00004320	Summary of Information Requested by Diane Regarding Loan Discharges Pursuant to 2016 Regulation
9.	DOE00004321-DOE00004322	Borrower Defense – Summary of Notice to Schools Process
10.	DOE00004939-4940	Capella School Notice Letter
11.	DOE00006016-6022	Borrower Defense Unit Claims Review Protocol
12.	DOE00006206-DOE00006508	Training Binder – Borrower Defense To Repayment
13.	DOE00006893-DOE0006895	Bd Work Plan For November 2019

Order	Bates Range	Document Title / Identifier
14.	DOE00006974	FSA FY 2020 A-123A Assessment
15.	DOE00007209-DOE00007214	Detailed Briefing: Borrower Defense and 2016 Rule – Corinthian Colleges and ITT Technical Institute
16.	DOE00007269-DOE00007271	Talking Points – Institutional Accountability Regulations
17.	DOE00007289-DOE00007291	Talking points – Borrower Defense to Repayment
18.	DOE00007866-DOE00007879	CCI guaranteed employment memo
19.	DOE00008693-DOE00008694	Borrower Defense Claim Review Productivity Requirements, Incentives and Support Plan
20.	DOE00008841-DOE00008843	Borrower Defense Quality Control Procedures
21.	DOE00009291	“Approval Rates” Memo
22.	DOE00009378-DOE00009379	DeVry School Notice letter
23.	DOE00009380-DOE00009382	Ashford School Notice Letter
24.	DOE00009383-DOE00009385	Infilaw School Notice Letter
25.	DOE00009386-DOE00009388	University of Phoenix School Notice Letter
26.	DOE00009399-DOE00009412	ITT Guaranteed Employment Memo
27.	DOE00009509-DOE00009518	Borrower Defense Presentation
28.	DOE00009519-DOE00009520	Anthem Education Group Memo
29.	DOE00009550-DOE00009551	CEC Memo With December 2020 Update
30.	DOE00009552-DOE00009553	CEC Memo
31.	DOE00009583	DeVry Memo

Order	Bates Range	Document Title / Identifier
32.	DOE00009585	Keller Memo
33.	DOE00009626-DOE00009630	EDMC Memo
34.	DOE00010045-DOE00010049	Beckfield College Memo
35.	DOE00010089-DOE00010093	Berkeley College Memo
36.	DOE00010201-DOE00010205	Brookline College Memo
37.	DOE00010297-DOE00010298	Business Industrial Resources Memo
38.	DOE00010339-DOE00010340	Career Institute of Health and Technology
39.	DOE00010341-DOE00010345	Career Point College Memo
40.	DOE00010364-DOE00010367	Carrington College Memo
41.	DOE00010368-DOE00010371	Carrington College Memo
42.	DOE00010571-DOE00010572	Concorde Career Institute Memo
43.	DOE00010573-DOE00010575	Concorde Career Institute Memo
44.	DOE00010647-DOE00010649	Davenport Memo
45.	DOE00010738-DOE00010740	Eagle Gate College Memo
46.	DOE00010783-DOE00010791	Empire Beauty School Memo
47.	DOE00010792-DOE00010794	Empire Beauty School Memo
48.	DOE00010795-DOE00010796	Empire Beauty School Memo
49.	DOE00010818-DOE00010825	Everglades University Memo
50.	DOE00010834	Everglades University Memo

Order	Bates Range	Document Title / Identifier
51.	DOE00010870	Florida Career College Memo
52.	DOE00010871-DOE00010874	Florida Career College Memo
53.	DOE00010957	Galiano Career Academy Memo
54.	DOE00010963-DOE00010966	Galiano Career Academy Memo
55.	DOE00011006-DOE00011008	Grantham Memo
56.	DOE00011207-DOE00011209	Institute for Business & Technology Memo
57.	DOE00011254	Iverson Institute Memo
58.	DOE00011259-DOE00011263	Iverson Institute Memo
59.	DOE00011330	Keller Memo
60.	DOE00011331-DOE00011340	Keller Memo
61.	DOE00011396-DOE00011403	Lacy Cosmetology School Memo
62.	DOE00011421	Lawton School Memo
63.	DOE00011426-DOE00011429	Lawton School Memo
64.	DOE00011569-DOE00011570	Masters of Cosmetology Memo
65.	DOE00011572-DOE00011574	Mattia College Memo
66.	DOE00011608-DOE00011609	Meridian University Memo
67.	DOE00011644-DOE00011647	Micropower Career Institute Memo
68.	DOE00011707-DOE00011711	Missouri Technical School Memo
69.	DOE00011746-DOE00011752	Morris Brown College Memo
70.	DOE00011761-DOE00011765	Mountain State Univ. Memo

Order	Bates Range	Document Title / Identifier
71.	DOE00011953-DOE00011956	Ohio Media School Memo
72.	DOE00012087-DOE00012088	Pinnacle Career Institute Memo
73.	DOE00012245-DOE00012248	Remington College Memo
74.	DOE00012388-DOE00012389	San Diego College Memo
75.	DOE00012560-DOE00012561	Southwest Memo
76.	DOE00012629-DOE00012633	Stenotype Institute of Jacksonville Memo
77.	DOE00012658	Strayer Memo
78.	DOE00012664-DOE00012668	Strayer Memo
79.	DOE00012673-DOE000012675	Suburban Technical School Memo
80.	DOE00012822-DOE00012824	Touro College memo
81.	DOE00012862-DOE00012863	Unitech Training Academy Memo
82.	DOE00012873-DOE00012877	Universal Technical Institute Memo
83.	DOE00013647-DOE00013656	Decision Memo: Tiered Relief Methodology
84.	DOE00013704-DOE00013707	Heald UCL Memo
85.	DOE00013708-DOE00013725	Heald Transfer of Credits Memo

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“Other” Document Types Cited

Order	Document Name	Link (if applicable)
1	Transcript from October 1, 2020 Hearing in <i>Sweet v. Cardona</i> (related to ECF No. 141, the zoom chat transcript).	n/a
2	Order re: Preliminary Injunction, <i>Calvillo Manriquez v. DeVos</i> , Case No. 3:17-cv-07210 (ND. Cal., May 25, 2018, ECF No. 60).	n/a
3	Premier Education group Litigation: Complaint, <i>United States v. Premier Education Group</i> (2016 WL 2747195)	n/a
4	Premier Education group Litigation: ECF No. 222	n/a
5	Premier Education group Litigation: ECF No. 224	n/a
6	Premier Education group Litigation: ECF No. 229	n/a
7	Premier Education group Litigation: Jeanette DeForge, Agreement with AG Forces Premier Education Group Out of Massachusetts; Salter College, Others, to Forgive \$1.6M in Student Debt	https://www.masslive.com/news/2019/07/attorney-general-agreement-to-shut-down-5-colleges-statewide-cancel-students-debt.html
8	Borrower Defense to Repayment Application – OMB No. 1845-0163	https://studentaid.gov/sites/default/files/BD-General-Application-Form.pdf
9	Borrower Defense to Repayment Application – OMB No. 1845-0146	https://studentaid.gov/sites/default/files/borrower-defense-application.pdf
10	Career Education Corporation, FTC Complaint, Case No. 1.19-cv-05739, N.D. Ill., ECF No. 1.	https://www.ftc.gov/system/files/document/cases/career_education_corporation_complaint_8-27-19.pdf

Order	Document Name	Link (if applicable)
11	Career Education Corporation, FTC Settlement, Case No. 1.19-cv-05739, N.D. Ill., ECF No. 11.	https://www.ftc.gov/system/files/documents/cases/de_11_-_stipulated_order_for_permanent_injunction.pdf
12	Career Education Corporation, Assurance of Voluntary Compliance, Case No. D-1-GN-19-000017	https://www.texasattorneygeneral.gov/sites/default/files/images/admin/2019/Press/FINAL%20CEC%20AVC%20attached%20to%20Petition%20wCauseNo.pdf
13	Kevin Carey, "Corinthian College Is Closing. Its Students May Be Better Off as a Result"	https://www.nytimes.com/2014/07/03/upshot/corinthian-colleges-is-closing-its-students-may-be-better-off-as-a-result.html?_r=0
14	Federal Student Aid, Fiscal Year 2020 Annual Report	https://www2.ed.gov/about/reports/annual/2020report/fsa-report.pdf?source=email
Not Attached. Use Live Link.	Borrower Defense to Repayment Loan Forgiveness Data	https://studentaid.gov/data-center/student/loan-forgiveness/borrower-defense-data

Supplemental Complaint**Exhibit Index****Docket Entries from *Sweet v. Cardona***

Please note: These documents are not attached, but gathered here in this table for reference because they are cited in the Supplemental Complaint.

Document Title/Identifier	ECF Number
Complaint	1
Defs.' Opp. to Plaintiffs' Motion for Class Cert., ECF No. 38	38
Class Certification Order, ECF No. 46	46
Nevin Dec., ECF No. 56-4	56-4
Defendants' Motion for Summary Judgement, ECF No. 63	63
Brown Dec., ECF No. 71-3.	71-3
Plaintiffs' Motion for Case Management Conf., ECF No. 108	108
Jacobson Aff., ECF No. 108-11	108-11
Connor Dec. in Support of Motion for Case Management Conf., ECF No. 108-2	108-2
Wright Aff., ECF No. 108-3	108-3
Deegan Aff., ECF No. 108-8.	108-8
Defs.' Resp. to Aug.31, 2020 Order, ECF No. 116, with Exhibits A-D attached	116
Sweet Affidavit (Exhibit 3 to Connor Dec., ECF No. 129-1)	129-1
Defs.' Opp. to Mot. to Enforce, ECF No. 140	140
Brown Dec., ECF No. 140-1	140-1
Zoom "chat" transcript, ECF No. 141	141
Defs.' List of Schools, Attachment to Filing in Response to Judge's Inquiry, ECF No. 145-2	145-2
Discovery Order, ECF No. 146	146

Defs.' Response to Order to Show Cause, ECF No. 150	150
Brown Declaration, ECF 150-1	150-1
DePaul Aff., ECF No. 151	151
Lezan Aff., ECF No. 155	155
Norton Aff., ECF No. 159	159