

I, Carrie Wofford, hereby attest:

1. I am the President of Veterans Education Success, a non-profit I founded in February 2013 to protect and defend the integrity and promise of the GI Bill and other federal education programs for veterans and servicemembers.

2. Before founding Veterans Education Success, I was Senior Committee Counsel on the U.S. Senate Committee on Health, Education, Labor & Pensions. Among the wide variety of issues I worked on in that role, I provided guidance to the Committee's comprehensive investigation into the abuses of the for-profit college industry as a whole, including ITT, and I led the Committee's work protecting veterans and service members from abuses by for-profit colleges like ITT.

3. I was awarded the 2012 Freedom Award, the 2012 Congressional Staffer of the Year Award, and the 2012 Legislative Proponent Award for my work building a coalition of allies on and off Capitol Hill to protect veterans and servicemembers from abuse by predatory for-profit colleges.

4. I received a law degree from Yale Law School in 2001.

5. In my current role as President of Veterans Education Success, my staff and I have communicated with thousands of veterans and servicemembers who attended and were deceived by predatory for-profit schools. In particular, my staff and I have spoken with hundreds of former students of ITT, who have come to my organization for help and to share their experiences. I have also spoken with several high-ranking former ITT employees who contacted my organization to express concern about ITT's treatment of veterans. The following paragraphs summarize my organization's findings.

6. Military veterans and active-duty servicemembers are often targeted by unscrupulous for-profit education companies because, through an unfortunate loophole in the

federal Higher Education Act (known as the “90/10” loophole), for-profit companies use an accounting gimmick to count military and veterans education funds as private dollars, which the companies use to off-set the cap the companies otherwise face on the amount of federal funds they may receive. In other words, as Holly Petreaus, the head of Service Member Affairs at the U.S. Consumer Financial Protection Bureau, wrote in the *New York Times*, “For every service member or veteran enrolled at a for-profit college and paying with military education funds, that college can enroll nine others who are using nothing but Title IV [Education Department] money. This gives for-profit colleges an incentive to see service members as nothing more than dollar signs in uniform, and to use aggressive marketing to draw them in and take out private loans.”

7. Most students who use the GI Bill and other related military benefits do not need student loans to complete their schooling. The Post-9/11 GI Bill is America’s chief way of saying thanks to men and women who have risked their lives in dangerous war zones in Iraq and Afghanistan. It is not just thanks; it is also America’s assurance that the current generation of veterans will not be homeless or reliant on public assistance; it is their ticket to a successful civilian career and the American Dream. The Post-9/11 GI Bill is a generous benefit. Indeed, the GI Bill is sufficiently funded to provide veterans a “free ride” at public universities and colleges, and the GI Bill also provides housing and book allowances. However, veterans and former ITT employees have told me that ITT recruiters routinely deceived veterans about the true cost of ITT’s tuition, because they did not want veterans to know that ITT cost more than a public university, and often deceived the veterans into loans the veterans did not want. ITT often pressured veterans to complete the FAFSA form to see if they were eligible for grants; the

students were promised that any money they got would be from grants, not loans. In addition, and more troubling, ITT also apparently signed veterans up for loans without their permission.

8. Many students who attended ITT discovered after graduation that they have significant student loan debt – some have as much as \$80,000 in debt (on top of using up their entire GI Bill) – acquired without their knowledge, that they must pay back.

9. The impact on these veterans is severe. They are left with crushing debt, which has broken up some of their marriages and caused emotional hardship; their hard-earned GI Bill is gone; and they have a subpar, often unaccredited, degree or no degree at all.

10. In addition to deceiving veterans about loans, ITT appears to have forged student signatures on loan documents. Many ITT students report that the school took out loans in their names without telling the students, allegedly even “forging” the student’s electronic signature on Master Promissory Notes (by requesting an electronic account from U.S. Department of Education Federal Student Aid, filling out the Master Promissory Note without the student’s knowledge or permission, and then setting up an email address to capture the responses from the Department of Education, without the veteran’s knowledge).

11. Former ITT recruiters and financial aid employees told me this practice was not uncommon at ITT. They said some ITT financial aid officers convinced themselves it was not forgery to package student loans without a borrower’s permission because electronic signatures were not the same as real signatures. Other ITT financial aid officers understood it was forgery, but nonetheless engaged in this fraudulent practice.

12. Many ITT students also complained that private loans were taken out on their behalf, without their consent, instead of federal loans. Lies concerning private loans are especially problematic because those loans are often higher interest and do not have the same

deferment and forbearance rules. If a school lies about loans, a student can experience major credit damage, which harms students and their families for decades to come.

13. In addition to being lied to about loans and the ITT tuition, veterans who have come to my organization for assistance also report that ITT recruiters routinely lied to prospective students about the accreditation of various ITT programs as well as the overall accreditation of ITT as an institution, the transferability of ITT credits to legitimate schools, graduates' eligibility to work in certain occupations which ITT knew it was not authorized or adequately preparing students for, graduates' job prospects and likely salaries, and the quality of the teachers, class materials, and education overall.

14. One veteran told me that ITT promised him that its criminal justice degree had the same accreditation and training as criminal justice programs at public colleges. Upon graduation, he applied to 24 police departments, flying on his own dime to make his case to the police departments. Every single department told him ITT's training was not properly accredited and did not meet the basic requirements for police work. He had wasted his entire GI Bill, and was left with more than \$80,000 in private loans to ITT.

15. Former high-level ITT employees described falsification of job placement rates. Students were counted as having job placements, when, in reality, the student had only an internship or a short-term placement that lasted two weeks.

16. One high-ranking employee of ITT approached my organization to alert us to a "bait and switch" scam targeting GI Bill users. Specifically, because ITT was so eager to get the GI Bill (to offset its cap on Education Department funds under the 90/10 loophole), ITT would promise veterans it could offer them training and programs it didn't actually offer, and then would enroll the veterans in an entirely different program. We encountered at least half a dozen

veterans who said this happened to them. For example, a veteran who was promised he could receive a B.S. in Engineering at ITT was instead enrolled in Accounting – without his knowledge or permission – because ITT did not want to admit it did not offer Engineering at his campus. The school kept stringing along the students by promising the degree they wanted would be starting “in the next term” or by lying to the students that the classes they were enrolled in were part of the degree the student wanted, even though the school knew full well that they were not. ITT’s “bait-and-switch” tactics were not isolated incidents. One campus played this trick on veterans on three separate occasions within a five-year time span. This resulted in veterans wasting their one shot at the GI Bill.

17. ITT employee whistleblowers, including high level leadership, provided internal corporate e-mails and documents to demonstrate this and other frauds being perpetrated on veterans.

18. ITT even manipulated veterans into providing positive reviews to the U.S. Department of Veterans Affairs (“VA”) by promising that positive reviews would increase the likelihood that the school could offer veterans a course of study that they wanted. The “quid pro quo” was explicit, with one veteran telling us he told ITT, “We defended ITT Tech when it came to the VA issue. It is time you keep your promise and hold up your end of the bargain by granting us our chance at our degree,” After veterans at one campus defended ITT to the VA, the school cancelled the veterans’ desired program of study. Veterans did not learn about the cancellation until the day when they were scheduled to start their classes. When complaints about the cancellation were escalated to the ITT’s corporate office, one corporate representative feigned that the decision was motivated by concern for veterans’ academic success. The manager

wrote that ITT avoids having small class sizes whenever possible because “small class size is not as effective in fostering [a] good educational environment” for students.

19. Executives within ITT’s corporate headquarters (“HQ”) sometimes used student needs to put window dressing on enrollment quotas. For example, Karen Carlozzi, ITT’s corporate Vice President for Recruitment, circulated an email encouraging recruiters to ramp up enrollment for programs with fewer than ten students because “we do not want to delay a prospective student from beginning class due to small section size.” In other words, Carlozzi was suggesting that ITT would cancel more programs if recruiters did not improve enrollment numbers. The same email contained a chart comparing different campus’s success rates at getting prospective students enrolled and pre-packaged for financial aid. In another e-mail, ITT District Manager Nader Mojtabi wrote, “We try to avoid [small class size].”

20. Former employees describe a bifurcated culture where ITT presented the external appearance of concern for students and regulatory compliance. Within ITT, however, students were viewed as potential sales targets. ITT’s internal communications focused on “sales production,” rather than student needs. One concerned employee reported being rebuked after suggesting that a prospective student should complete a remedial course at a community college before enrolling at ITT.

21. ITT’s internal culture was highly focused on recruitment numbers. Campus managers and employees who failed to meet recruitment metrics were punished and terminated. Recruitment minimums and goals were set by HQ and closely monitored through a top-down incentive structure, as documented in the internal documents employees shared with us. ITT policies ensured that campus managers and employees were constantly under pressure to meet their recruitment targets.

22. Campus recruitment numbers were tracked and managed by many layers of review from ITT HQ. ITT's Corporate VP for Recruitment and Corporate VP for Student Finance sent weekly emails to all ITT campuses comparing their recruitment numbers and encouraging more enrollment. ITT employees shared such weekly emails with us. Additionally, District Managers were in daily contact with campus managers and often provided targeted recruitment advice. For example, ITT District Managers instructed campus managers to hold phone-a-thons and create competitions between staff members to boost enrollment numbers. Pressure was put on ITT employees to increase the number of students each month that they were able to "package." (To "package" a student means to get him fully enrolled and signed up for loans.)

23. The pressure generated by constant tracking and comparison on enrollment numbers was backed by a centrally controlled Human Resources policy that linked ITT employees' job security with "sales production." Admissions representatives and financial aid representatives who did not meet their targets were subject to "corrective actions" that progressed in severity from counseling to warnings and finally to termination. These policies were in writing and were distributed by ITT's COO and President, Gene Feichtner, and ITT's Human Resources director, Julie Gasaway. We have been copies of these documents by ITT employees.

24. Branch campuses reportedly had no authority or decision making power over HR decisions. ITT held trainings across campuses and distributed templates to ensure that all campuses were "on the same page" regarding "corrective actions." Moreover, ITT's central HR office maintained approval-level control over all "corrective actions."

25. Campus managers, in turn, were expected to apply constant pressure to encourage staff members to meet their numbers. Every week, recruiters met with a campus Director of Recruitment (“DOR”) to review their enrollment numbers. These review meetings were documented with notes maintained in the employee’s permanent file. Per ITT policy, each employee was subject to a review at least once a month, and “corrective action” was required if the employee had failed to meet certain recruiting quotas.

26. ITT recruiters who failed to meet their target numbers received “counseling” as their first “corrective action.” They would also be assigned to observe a “Seasoned Representative,” so that underperforming recruiters would absorb effective sales tactics, including applying undue pressure and using misrepresentations.

27. HQ’s centralized counseling template asks employees to “meet all ITT Representative expectations *written and implied*.” (emphasis added).

28. According to high-ranking former employees, the written guidance for ITT employees was designed to be “clean” and pass any government inspection, but the real guidance was not what was written down. The real guidance to recruiters was that they were expected to “do anything and say anything” to convince prospective students to sign up and complete financial aid packages.

29. One former recruiter who won multiple awards and was promoted to a management position said that when training a new representative, advisors would mention an “unspoken culture and unspoken methods.” For example, this employee recalls telling students that ITT’s job placement rate for students was 70%, even though that number was not accurate.

30. ITT recruiters across multiple campuses were trained to create a false sense of urgency by telling prospective students that if they did not sign up immediately, they would be

barred from signing up for the next six months. This was not true. ITT campuses were constantly eager to enroll more students.

31. Financial aid officers were also pressured to meet target numbers and were subject to “corrective actions” if they failed to meet quotas for financial aid packaging. ITT incentivized advisors to get students to take out loans, whether the student needed it or not.

32. Former employees compared ITT’s financial aid representatives to the finance advisors at car dealerships. ITT corporate policy mandated a two-step financial aid process: the “Pre-Conductor” would provide a sales pitch on the financial value of the program and the “Conductor” would overwhelm the student with paperwork. Financial aid representatives had to engage in a set number of “Conducts” each week, or face termination.

33. Financial aid representatives were trained to sell students on “Opportunity Scholarships.” In reality, these were offered to nearly all prospective students. The published price was never used. ITT used this practice of presenting an inflated sticker price along with a purported “scholarship” or discount to make students feel like they were getting a deal.

34. ITT employees also told me that regional senior leadership for ITT, including regional chief financial officers, regularly said aloud in meetings that they were uncomfortable reporting data and numbers to the U.S. Education Department that they were asked to submit, because they knew those numbers to be false. Such reports included job placement rates, graduation rates, and compliance with Education Department rules, including the 90/10 rule with its loophole for veterans..

35. Employees at the highest levels of campus management traced ITT’s policies to the top of the ITT’s corporate structure. ITT’s corporate headquarter in Carmel, Indiana, was a

“command and control entity” that exercised “100 percent” control over the recruitment tactics, financial aid pressure, and Human Resources practices used across all branch campuses.

36. ITT used intimidation and retaliation tactics to shut down employees who tried to question corporate policies. ITT’s Legal Counsel made threatening phone calls. ITT’s HR director frequently stated “if you push back, you will hear from HQ.” One employee was threatened after he sent an email to ITT’s CEO, Kevin Modany, expressing concerns about inaccurate statements that were made to students. ITT threatened to terminate this employee shortly after this email was sent. Some employees expressed concern that ITT would retaliate on a personal level and asked to remain anonymous.

37. Attached to this affidavit are true and correct copies of e-mailed documents that I received from whistleblower employees at ITT, and redacted to protect the identities of sources.

38. Exhibit A is a copy of an email from ITT’s President and Chief Operating Officer, Gene Feichtner, on October 1, 2012, to all ITT College Directors, District Mangers, and Regional Directors of Recruitment with the subject “Representative Minimum Standards for Conducted Interview.” The names of some individual recipients are redacted. This email describes ITT’s centralized and uniform policy for progressively disciplining recruitment representatives who fail to meet minimum standards for recruitment. Representatives who failed to meet their quotas were punished and terminated.

39. Exhibit A-1 is a copy of a document attached to Exhibit A providing “Definitions and FAQ’s” on “Representatives Minimum Standards for Conducted Interviews.” [sic]

40. Exhibit B contains an email that was sent by ITT’s Human Resources Partner, Julie Gasaway on August 12, 2014 with the subject “2nd Quarter Performance Management.” The names of some recipients as well as header information showing that the email was

forwarded are redacted. This email shows the centralized control of “corrective actions” against ITT employees who demonstrate “performance deficiencies” – in other words recruiters who fail to meet their enrollment and financial aid packaging numbers.

41. Exhibit B-1 is a copy of a model “Counseling Form” that was attached to Exhibit B. Names and other information identifying the employee and supervisor discussed on this model form are redacted. HR required campuses to use this form if recruiters failed to meet their quotas. This document shows the corrective actions that ITT recruiters were subject to if they failed to meet ITT’s “written and implied” expectations.

42. Exhibit C is a copy of two emails sent from Ms. Gasaway to ITT campuses and other members of HQ. The first email was sent on Nov. 6, 2014 with the subject “Further Clarification of Rep Performance Standards.” The second email was sent on November 24, 2014, with the subject “TEMPLATES – Rep Performance Management.” The names of some recipients are redacted. These emails highlight ITT’s policy of maintaining central control and uniformity across branch campuses.

43. Exhibit D is a redacted copy of two emails sent from ITT’s Vice President of Recruitment, Gene Feichtner, Karen Carlozzi, in August 2015 to all ITT Directors of Recruitment, College Directors, District Managers, and Regional Directors of Recruitment. The first email with the subject “RPvA Leader’s Board” was sent on or around Monday, August 24, 2015 and began with the text “Just 3 weeks left!” The second email, also with the subject “RPvA Leader’s Board” was sent on Monday August 24, 2015, and began with the text “there are 2 weeks remaining.” The names of recipients and header information showing how emails were forwarded are redacted. The first email was magnified and the send date was omitted, however, the second email provides context and a probable date range for the first. Together, these emails

reflect the weekly tracking and comparison of recruitment numbers across ITT campuses by central management.

44. Exhibit E is a copy of two emails sent from ITT's Vice President of Student Finance, Michael "Mick" Lindvay in September 2015 to all Directors of Finance, Directors of Recruitment, Regional Directors of Recruitment, College Directors, District Managers, and VP of Recruitment, Karen Carlozzi. The first email was sent on Sept 9, 2015 with the subject "Top Leaders in September Packaging one week before start." The forwarding heading is redacted. The second email was sent on September 15, 2015, with the subject "September Packaging Leaders." These emails further reflect the pressure from HQ to increase recruitment numbers and also reflects the coordination between ITT's Recruitment and Student Finance departments.

45. Exhibit F is a copy of "Coaching Document" that was distributed by ITT HQ and that lists possible "Action Plans" for recruitment representatives who fail to meet quotas. Names and other information identifying the employee described on this model form are redacted.

46. Exhibit G is a copy of a series of five emails that were distributed by ITT's District Manager for the Southern California region, Nader Mojtabei, to campus managers between March and August 2015. The names and identities of recipients are redacted. These documents reflect the constant pressure to produce recruitment numbers.

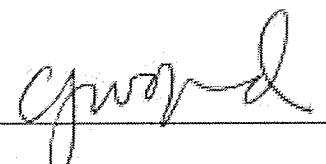
47. Exhibit H is a copy of an email chain sent from ITT's National Dean, Paula Cherry, on September 1, 2015, to ITT managers with the subject "Please Read." This document includes an email sent to Ms. Cherry from an ITT student veteran about ITT's bait-and switch-practice. The names of some recipients and the name and identifying information for the student veteran are redacted.

48. Exhibit I is a redacted copy of an email sent from ITT District Manager Nader Mojtabai on September 1, 2015, to ITT managers with the subject "Nader small program input[]." The names of some recipients and the forwarding block are redacted. This email reflects ITT's approach to managing complaints from student veterans.

49. Exhibit J is a redacted copy of an email sent from a second student veteran, on September 1, 2015, to ITT managers with the subject "Re: Financial Aid Appointment." This document further reflect ITT's "bait and switch" practice, including ITT's attempt to continue to package veterans for financial aid, even after managers decided to cancel the program in which veterans had enrolled. The names of some recipients and the name and identifying information for the student veteran are redacted.

50. I am submitting this affidavit in support of former ITT students and their claims in the ITT Bankruptcy.

51. I certify under pain of perjury that the foregoing is true and correct to the best of my knowledge.

Signed 
Carrie Wofford

Date: 1/2/2017

County of Montgomery

State of Maryland

Exhibit A

From: Gene Feichtner at HQ
Sent: Monday, October 01, 2012 9:05 AM
To: DORs
Cc: District Managers; RDORs; College Directors; [redacted] at HQ; [redacted] at HQ; [redacted] at HQ; [redacted] at HQ; [redacted] at HQ; [redacted] at HQ; [redacted] at HQ; [redacted] at HQ
Subject: Representative Minimum Standards for Conducted Interviews

Our success depends on the talent and performance of dedicated employees who concentrate, above all, on quality, compliance and customer satisfaction. In an effort to positively impact the level of service provided to our prospective students, we are establishing a minimum standards expectation for Representatives' activity to be implemented effective October 1, 2012. This standard will apply to the Representative's primary responsibility which is to respond to potential students' inquiries and requests for information about our programs of study as well as conduct face-to-face interviews to assist prospective students in determining their educational needs, concerns and interests.

The performance standards require a Representative to conduct, minimally, an average of two face-to-face interviews per week and will be measured as an average of a rolling four week period. The report used to measure the representative's conducted interview performance will be the Representative Plan vs. Actual (RPvA). New Representatives who are "eligible" to conduct interviews are provided a 30 day orientation period prior to being subject to the minimum standard expectation. Each failure to meet the minimum standard will result in moving to the next step of the progressive corrective action process as outlined below:

- Formal Counseling:** Representatives will meet weekly with their DOR/MOR to review their performance to their Representative Plan (RPVA). This meeting will be recorded on the Coaching Document of the RPvA report and maintained in individual Representative binders. Conversations and Documentation surrounding negative variances will be considered Formal Counseling Sessions.
- Written Warning:** Representatives not meeting the weekly minimum average for conducted interviews after two weeks of the measurement period will receive a written warning in accordance with ER14.1, the company's policy on corrective action.
- Final Warning:** If the representative fails to achieve the minimum standard for conducted interviews for the four or five week period of measure, they will receive a final warning, as defined by company policy ER14.1.
- Termination:** Representatives who fail to average the minimum standard for conducted interviews at any weekly measuring point after two complete weeks during the next measurement period will be subject to termination.

The representative can clear all previous corrective action by meeting or exceeding the minimum standard for three consecutive evaluation periods.

For example; Representative A had the following conducted interview activity completed in the four week period of measure:

Representative A

Week 1	Week 2	Week 3	Week 4
1 conducted interview	3 conducted interviews	2 conducted interviews	2 conducted interviews

Representative A conducted eight interviews during the four week time period for an average of two conducts per week thus meeting the minimum standard of two conducted interviews per week.

Representative B

Week 1	Week 2	Week 3	Week 4
1 conducted interview	2 conducted interviews	2 conducted interviews	2 conducted interviews

Representative B conducted seven interviews during the four week period of measure and did not meet the minimum standard. Representative B will be issued a written warning after week two based upon their inability to achieve an average of two conducts. The representative will then receive a final warning at the end of the period of measure for failing to average the minimum standard of conducts during the entire four week period. Representative B will then be required to meet the average minimum standards during their next period of measure or be subject to termination.

By implementing the minimum standard expectation we will provide higher levels of service to our prospective students, move towards becoming more efficient and productive in our recruitment process, and more consistent in measuring our minimum standard expectations.

Should you have any questions do not hesitate to contact your District Manager.

Exhibit A-1

REPRESENTATIVES MINIMUM STANDARDS FOR CONDUCTED INTERVIEWS

Definitions and FAQ's

Eligible Representative -- a Representative who meets all certification, licensure and other company requirements to meet with prospective students.

Minimum Standard -- Representatives must conduct an average of two face-to-face interviews (Conducts) per week during a *Period of Measure*.

Period of Measure -- a rolling four week period which are the four most recent weeks of Representative performance data prior to the Evaluation Date. The first Period of Measure begins on Monday, October 1, 2012.

Evaluation Date -- Representative performance will be evaluated bi-weekly beginning on October 29, 2012 for a Period of Measure. Subsequent Evaluation Dates are Nov. 12, Nov. 26, Dec. 10 and every two weeks thereafter).

Formal Counseling: -- Representatives will meet weekly, at a minimum with their DOR/MOR to review their performance to their Representative Plan vs Actual (RPvA). This meeting will be recorded on the RPvA Coaching Document report and maintained in the individual Representative binders. Conversations and Documentation surrounding negative variances to quarter plan will be considered Formal Counseling Sessions.

Written Warning: -- A Representative that was at the Formal Counseling stage and fails to meet the Minimum Standard for a subsequent Period of Measure will receive a Written Warning in accordance with Policy ER 14.1 -- Corrective Action.

Final Written Warning: A Representative that was at the Written Warning stage of the Corrective Action process and fails to meet the Minimum Standard for a subsequent Period of Measure will receive a Final Written Warning in accordance with Policy ER 14.1 -- Corrective Action.

Termination: A Representative that was at the Final Written Warning stage of the Corrective Action process and fails to meet the Minimum Standard for a subsequent Period of Measure will have their employment terminated in accordance with Policy ER 14.1 -- Corrective Action.

A Representative can clear or "reset" the corrective action process for Minimum Standard if he or she receives no further corrective action for a period of six (6) months from the date of the last Corrective Action. Corrective action for subsequent failures to achieve the Minimum Standard for a Period of Measure will begin at the Written Warning stage.

How are week long absences from work (vacation, sick, jury duty, etc.) factored in to the calculation of the average number of Conducts per week? In the event of a week long absence from work, the average for a Period of Measure will be the actual number of Conducts divided by the number of weeks that the Representative worked during the Period of Measure.

How are partial week absences from work (1-4 days for vacation, sick, jury duty, etc.) factored in to the calculation of the average number of Conducts? In the event that a Representative is not at work for part of work week, Minimum Standard still applies for that partial week.

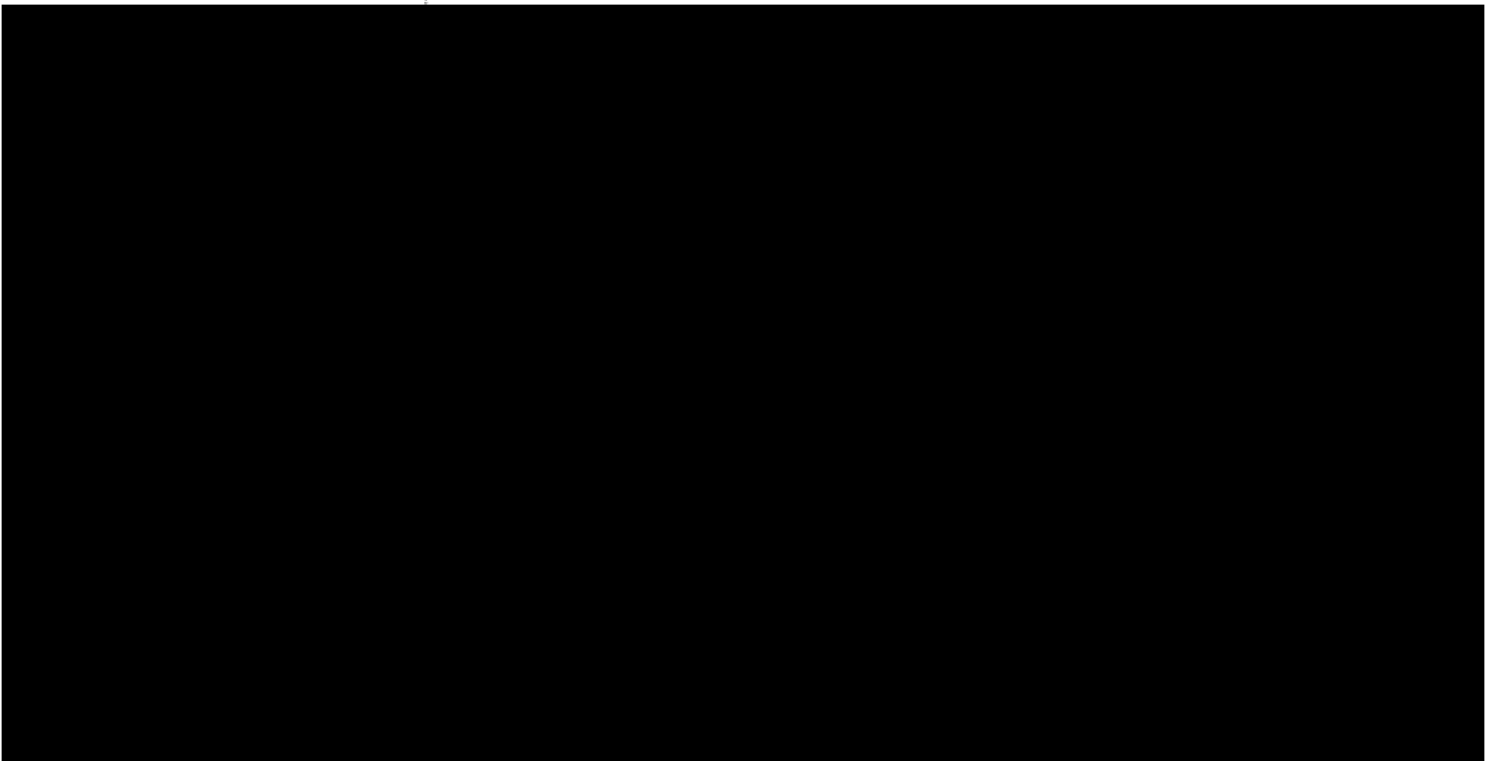
How are company observed holidays factored in to the calculation of the average number of Conducts? For weeks during which the Company observes a holiday, Minimum Standard still applies for that week.

How are corrective actions for other infractions such as Mystery Shop violations and Behavior/Conduct violations factored in to this process? Corrective Actions for all reasons are managed cumulatively. If a Representative has received corrective action for any reason and his or her performance for a Period of Measure warrants further corrective action, he or she may receive the next progressive stage of corrective action.

Are Management Trainees subject to this process during their Recruitment rotations? Management Trainees are not subject to the Minimum Standard. However, DORs should review the Management Trainees performance against the RPvA for coaching and feedback, similarly to other Admission Representatives.

ITT/ESI may repeat, modify, or omit levels of corrective action based on its assessment of the facts of the specific situation in accordance with Policy ER 14.1 – Corrective Action.

Exhibit B



From: Julia Gasaway at HQ
Sent: Tuesday, August 12, 2014 10:41 AM
To: [REDACTED] at HQ; [REDACTED] at HQ; [REDACTED] at HQ
Subject: RE: 2nd Quarter Performance Management

You may already have templates to address corrective action where needed for quarterly performance deficiencies, but thought I'd send attached to you as I'm receiving some questions. For Registrar position, the DOR template can be modified. Feel free to modify these templates as needed.

Julia Gasaway
Human Resources Partner
ITT Educational Services, Inc.
Corporate Office, Carmel, IN
(317) 706-9298 (office)



Exhibit B -1

COUNSELING FORM

EMPLOYEE NAME [REDACTED]	EMPLOYEE NUMBER [REDACTED]	DATE PREPARED [REDACTED]
JOB TITLE Admissions Representative	DATE OF HIRE [REDACTED]	DATE IN POSITION [REDACTED]
SUPERVISOR NAME [REDACTED]	DEPARTMENT Recruitment	LOCATION [REDACTED]

Purpose of Form: This Form is intended to be a tool for supervisors to document counseling with employees in accordance with the Company's Corrective Action Policy ER 14.1 and to assist the supervisor with the counseling itself. Completed Counseling Forms must be retained by the supervisor. The Form should not be submitted to Human Resources until such time as Human Resources requests the Form or the supervisor seeks to initiate corrective action, completes the Corrective Action Form, and attaches this completed Form.

Background Information	For discussions related to performance, provide relevant facts, e.g., performance results for specified time periods. For discussions related to conduct, describe observed conduct, date, time, place and witness(es). Also include information regarding any prior counseling. [REDACTED]
Counseling Discussion	<p>1. Explain the reason for the counseling and the specific performance/conduct concern(s).</p> <p>A review of your work performance over the past three (3) weeks has shown that your production has fallen below the goals established for your position. More specifically, you have had 0, 2, and 2 Pre-scheduled appointments over the past three (3) weeks.</p> <p>The Representative Minimum Standards states Representatives must set a minimum an average of three (3) pre-schedule appointments per week during the period of measure. The period of measure is the three (3) week period which is the three (3) most recent weeks of Representative performance prior to the Evaluation date.</p> <p>2. Clearly describe expectations of an acceptable level of performance or conduct.</p> <p>It is important that all ITT technical institute employees provide excellent customer service. You must make all attempts to assist our students by reaching the goal of three (3) to five (5) pre-scheduled appointments for the following week.</p> <p>3. Gain employee's commitment to improve performance or change conduct.</p> <p>[REDACTED] agrees to meet all ITT Representative expectations written and implied.</p> <p>4. State the consequences of not improving/changing (i.e., the need to initiate corrective action).</p> <p>Pre-schedules must improve to the expectation; this is subject to corrective action, up to and including termination</p>
Plan of Action	<p>Describe the action the employee is expected to take to improve performance or change conduct. For performance improvement discussions, include specific, measurable performance goals and timelines. For conduct improvement discussions, set forth what constitutes unacceptable conduct and what constitutes appropriate conduct.</p> <ul style="list-style-type: none"> In order to assist you in achieving your Scheduled rate the following coaching activities will be conducted during the next two weeks: Phone activity observation with MOR. Achieve or exceed the minimum lead to schedule ratio (minimum standards expectations) for position on a weekly basis. Observe Master Representatives overcoming delay objections by students. Improve your ability to address common issues to visiting the campus by completing the e-Campus course "Identify and Addressing Issues" within 3 business days. You must be confident, professional and effective while remaining in compliance with Company recruitment policies and guidelines. Effectively prioritize your duties and manage your time. Effectively apply the training you have received. If there are areas in which you would like to receive more training, you must let me know. Schedule a time to follow up with all non-scheduled inquiries per week and track reasons for non-scheduled in S3. Submit to MOR/DOR weekly.

	<ul style="list-style-type: none"> • Review with MOR/DOR to discuss opportunities of improvement in the schedule rate. • Call to remind students of appointments 24 hours prior. • During your conversations, obtain at least one personal referral each week, as referrals tend to have a higher schedule rate than non-referrals. • Make sure to include parents or other people who influence both dependent and independent students. 	
Follow Up Date	Date supervisor plans to have follow-up discussion with employee. Will be scheduled 30 days from the date of issuance of this document	
Counseling Discussion Conducted By	SIGNATURE	DATE
Employee Acknowledgement	My signature verifies that I have read this Counseling Form. While I may not agree with the information contained in the Form, I understand that: <ol style="list-style-type: none"> 1. If the requirements described in this Form are not met within the specified time frame and satisfactory performance and conduct are not sustained, further corrective action may be taken, up to and including termination of my employment. 2. Nothing in this document is intended to change the employment-at-will relationship between ITT/ESI and me. 	
	EMPLOYEE SIGNATURE	DATE

Exhibit C

From: Julia Gasaway at HQ
Sent: Thursday, November 06, 2014 8:08 AM
To:



Cc: [redacted] at HQ; [redacted] at HQ; [redacted] at HQ; [redacted] at HQ;
[redacted] at HQ
Subject: Further clarification of Rep Performance Standards

I wanted to bring some clarification to the new Representative performance metrics that were effective 10/5/14.

As we have just completed the first four weeks since implementation, it's critical that we are all on the same page regarding interpretation of the guidelines.

A corrective action can be taken if a Rep does not meet guidelines as explained below. If performance does not meet #1 (*>=3 metrics >-10% variance*) OR #2 (*significant variance in one or more metrics when compared to peers*) counseling or other corrective action can be taken.

In other words, even if the Rep does not show three or more metrics >-10% to plan, corrective action may still be indicated if their performance metrics indicate a negative variance compared to their peers. However, we would not proceed with any corrective action based on poor RPvA metrics if the Rep meets all three metrics as explained in #3 below.

Keep in mind, however, that corrective action may be indicated for job performance issues outside of RPvA metrics; for example, multiple years of a PP&E score with results below standard and quarterly/mid cycle reviews showing results that are not on track to meet standard per the Representative Performance Plan.

When submitting a corrective action for HR review, please indicate whether the corrective falls under #1 or #2. If #2, please submit the RPvA for all other Reps with same job title, or better yet, a spreadsheet showing where the Rep falls within performance guidelines compared to others with same job title.

Please feel free to cascade this email as appropriate.

From: Julia Gasaway at HQ
Sent: Monday, November 24, 2014 9:41 AM
To:

Cc: [REDACTED] at HQ; [REDACTED] at HQ; [REDACTED] at HQ
Subject: TEMPLATES - Rep Performance Management
Attachments: TEMPLATE Corrective Action - 3 RPvA METRICS Nov 2014.docx; TEMPLATE Corrective Action - PEER PERFORMANCE Nov 2014.docx; Performance_Mgmt_Trng_Session2_GE%209.0%2010.1.14.pptx

Importance: High

Thought it would be helpful to provide you with a template that can be used to address poor job performance for Representatives. Utilizing a template ensures better consistency and provides you more efficiency when completing a corrective action.

- The document named "TEMPLATE Corrective Action – 3 RPvA" is used to address job performance in which three or more metrics on the RPvA have a variance greater than -10** (*see explanation below*).
- The document named "TEMPLATE Corrective Action – PEER PERFORMANCE" is used to address job performance in which one or more of the metrics are poor when compared to their peers (those with the same job title). The individual may not be performing well, but they do not have at least three metrics with variance >-10.

It's essential that you also customize the area named "Performance or Conduct Expectations"—we want to give our employees the right tools to help them succeed. In this section, you would indicate specific activities (such as shadowing a highly seasoned Rep) or additional training that is geared toward their specific problem areas.

For those of you who may need a refresher on the new performance standards that were implemented 10/5/14, I've also included the original Powerpoint presentation that was given by Recruitment. Explanation of the new standard starts on page 32, but there is valuable information throughout the document to help you effectively manage job performance.

Lastly, a friendly reminder that all corrective actions must be approved by HR before distributing to employees. A formal counseling document needs approval only at campus level.

This email should be forwarded and discussed with all employees who manage Representative's job performance.

Please feel free to reach out with any questions.

** Rep variance is calculated by subtracting the plan % goal from the actual % goal. For example, a Rep with a Conduct goal of 40% who actually performed at 28% would have a variance of -12% (28%-40%= -12%). There is no longer any "minimum" conduct goal of 5%, 7%, etc.

Exhibit D

Subject: RPA Leader's Board
Importance: High

Just 3 weeks left!

National Orientations last week should have provided a clear picture of your September class roster. Be sure to personally reach out to all individuals that were confirmed but did not attend to assist in addressing any remaining issues. This week's Show Meeting must include a review of Core Program standings. Any program with less than 10 net applications needs your immediate attention – we do not want to delay a prospective student from beginning class due to small section size. At this point in the quarter, you must also monitor future quarter applications and students without schedules. There are a lot of plates to spin over the next 5 weeks...this quarter requires your undivided energy and attention...our students deserve it!

Here are the **District Rankings** and **Top Campuses** in ***Inquiry to Pre-Packaged!!!***

Congratulations to those leading the way toward Student Success!

Campus	Inquiry to Pre-Packaged
Baton Rouge MC	11.49%
Pensacola MC	11.35%
Swartz Creek MC	11.18%
Oxnard MC	10.26%
Madison WI MC	9.60%
Canton MC	9.42%
Boise MC	9.20%
North Charleston MC	8.90%
Mobile MC	8.64%
Tucson MC	8.33%
Fort Myers MC	7.80%
National City MC	7.48%
Duluth MC	7.35%
Vista MC	7.25%
Marlton MC	7.23%
Indianapolis MC	7.17%
Indianapolis East MC	7.10%
Sylmar MC	6.92%
Fort Wayne MC	6.83%
Johnson City MC	6.77%

District
SOUTHERN
SOUTHERN C
SOUTHWEST
NORTHEAST
OHIO VALLEY
SOUTH ATLANTA
NORTH CENTRAL
CENTRAL
SOUTH CENTRAL
NORTHWEST
SOUTHEAST
MIDWEST

Karen Carlozzi

Vice President, Recruitment
ITT Educational Services Inc.
1-800-388-3368

ITT Technical Institute
GENERATION FOR THE FUTURE

From: Karen Carlozzi at HQ
Sent: Monday, August 31, 2015 11:09 AM
To: DORs
Cc: College Directors; District Managers; Kevin Modany at HQ; Gene Feichtner at HQ; Barry Simich at HQ; Richard Zeeman at HQ; RDORs
Subject: RPA Leader's Board
Importance: High

There are 2 weeks remaining until the September 2015 quarter start!

It's imperative that we manage the details of each RPA metric to maximize our opportunities when assisting individuals to make a positive life change. As prospective students continue to inquiry, your Inquiry Management Reviews should concentrate on **inquiry response time**. As we've discussed during several training initiatives, the single most impactful element in contacting inquiries is the length of time between inquiry creation and first attempt to contact. **Work collaboratively with the Finance and Registration Departments** to ensure a seamless transition occurs and there are no delays in student packaging and course registration.

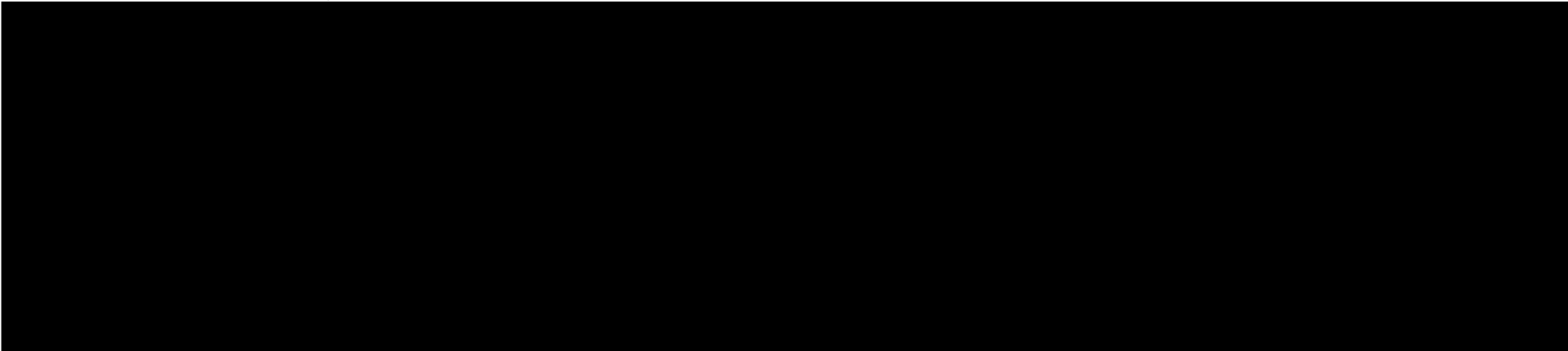
Here are the **District Rankings** and **Top Campuses** in ***Inquiry to Pre-Packaged!!!***

Congratulations to those leading the way toward Student Success!

Campus	Inquiry to Pre-Packaged
Pensacola MC	12.76%
Baton Rouge MC	11.89%
Swartz Creek MC	10.42%
Oxnard MC	10.29%
Canton MC	10.14%
Madison WI MC	9.60%
North Charleston MC	8.88%
Boise MC	8.86%
Mobile MC	8.55%

District	Inquiry to Pre-Packaged
SOUTHERN	6.06%
SOUTHERN CALIFORNIA	5.92%
SOUTHWEST	5.21%
OHIO VALLEY	4.79%
NORTHEAST	4.74%
SOUTH ATLANTIC	4.48%
NORTH CENTRAL	4.44%
CENTRAL	4.23%
SOUTH CENTRAL	4.05%

Exhibit E



From: Mick Lindvay at HQ
Sent: Wednesday, September 09, 2015 3:18 PM
To: DOF's
Cc: DORs; RDORs; Karen Carlozzi at HQ; College Directors; District Managers
Subject: Top Leaders in September Packaging one week before the start!

Congratulations to our Top Leaders that have already exceeded 69% Packaged!

Keep driving your team to excel! We still have **one week** before the September Start to help our prospective students realize their dreams!

The goal is to reach a minimum of **60% Packaged** by **September 27th**! Reach to exceed **69% Packaged**!

September Packaging Tips:

- Contact any students who still need FA Meetings and get them scheduled as soon as possible!
- Work your reporting tools to track students through the packaging process!
- Hold your team accountable to timely ISIR processing and clearance activities!
- Ensure all anticipated funding is ready to disburse!

September Packaged Cancels:

- Keep the focus on the prospective student! Our **Packaged Cancel %** (the percentage of packaged students who cancel registration) is a critical factor in meeting our Packaging goals. Stay in touch with your packaged students so that we can maintain their enthusiasm to attend

school! You can contact the student regarding upcoming campus events, new information regarding financial aid, or simply to ask if they have any questions and proactively address any concerns.

Reminders:

- The **2014-15 FAFSA Correction and FSA Processing Deadlines** are rapidly approaching! Corrections to 2014-15 FAFSA applications and ISIRs must be received by CPS before midnight (central time) on September 19, 2015. In order to process 2014-15 federal student aid disbursements, a valid ISIR must be received on or after September 28, 2015. Please review your students to ensure that all necessary corrections are submitted prior to this deadline for anyone that may potentially receive federal student aid from the 2014-15 award year. If you have 2014-15 ISIRs with issues that require HQ review and approval such as C-Codes, Professional Judgment, or Dependency Override requests, make sure all necessary documentation is properly uploaded to the student account and change the request status to "Pending HQ Review" as soon as possible to allow time for any necessary ISIR corrections.
- As discussed during the required training call, **R2T4 Automation** has now been enabled for all locations. The system will automatically identify, calculate, and post the required R2T4 adjustments in accordance with the R2T4 Calculation Worksheet and federal regulations. As a reminder, it is a requirement that the school continues to track all student withdrawals through monitoring of system reports and communication with Registration and Academic Affairs. The R2T4 Automation process must be validated as successful on the next business day after a student's status changes from active to inactive. All additional manual activities must be completed by the school as detailed in the training, including the tracking and resolution of any identified Post Withdrawal Disbursement (PWD). Any and all issues or questions related to the R2T4 Automation process should be immediately forwarded to your Field Finance Manager for resolution. Please assist us with the implementation of this important enhancement to ensure the timely and accurate processing of R2T4 for all students and locations!
- The **2015-16 FWS Allocations** have been delivered by district to all DOFs and College Directors. All Finance staff must review the Campus Based Aid Programs training presentation and recording posted to the Finance page of the employee portal to ensure proper management of 2015-16 FWS funds. FWS Award Letter requests are to be sent to the SFS Approval Required at HQ mailbox using the updated Campus Based Calculation Worksheet.
- Keep the focus on compliance! Have you generated and reviewed your **Title IV Credit Balance Report** today? The report is updated every day and available on demand through the Employee Portal. Each DOF is required to generate and review the Title IV Credit Balance report at minimum weekly to identify and resolve Title IV credit balances as they occur. If action can be taken to reduce or eliminate the credit balance requiring resolution, the action needs to occur before the Date of Resolution specified. HQ will be initiating a refund or OS reversal on the student's account on the Date of Resolution pursuant to the authorization statements selected to resolve the Title IV credit balance.

Top Leaders	Package
Youngstown MC	81.48%
Akron MC	72.94%
Sylmar MC	69.31%

District	FA Conduct	Pre-Package	Package
SOUTHERN CALIFORNIA	79.40%	62.53%	58.33%
OHIO VALLEY	87.55%	63.74%	55.83%
CENTRAL	83.76%	58.90%	54.98%

From: Mick Lindvay at HQ
Sent: Tuesday, September 15, 2015 7:20 PM
To: DOF's
Cc: DORs; RDORs; Karen Carlozzi at HQ; College Directors; District Managers
Subject: September Packaging Leaders
Attachments: 15.9.14 Packaging SEP-15.xlsx

Look at all of our Top Leaders who have already exceeded 69% Packaged!

Keep the focus on providing *excellent customer service* to our *prospective students* during this start week!
Reach a minimum of **60% Packaged** by **September 27th**! Reach to exceed **69% Packaged**!

Open Enrollment begins this week. Because the *prospective student* requires pre-registration documents, Enrollment Agreement, and disclosures to schedule and sit in class, it is necessary to have a good tracking system in place to monitor the packaging process. Monitor your packaging reports! Stay focused on the *prospective student* and have their **Packaging Meeting scheduled within 48 hours**. Review incoming ISIR data daily for timely student packaging. Keep working with these students to get everyone packaged as soon as possible!

September Packaging Tip:

- Keep the focus on the prospective student! Our **Packaged Cancel %** (the percentage of packaged students who cancel registration) is a critical factor in meeting our Packaging goals. Stay in touch with your packaged students so that we can maintain their enthusiasm to attend school! You can contact the student regarding upcoming campus events, new information regarding financial aid, or simply to ask if they have any questions and proactively address any concerns.

Reminders:

- The **2014-15 FAFSA Correction and FSA Processing Deadlines** are rapidly approaching! Corrections to 2014-15 FAFSA applications and ISIRs must be received by CPS before midnight (central time) on **September 19, 2015**. In order to process 2014-15 federal student aid disbursements, a valid ISIR must be received on or after **September 28, 2015**. Please review your students to ensure that all necessary corrections are submitted prior to this deadline for anyone that may potentially receive federal student aid from the 2014-15 award year. If you have 2014-15 ISIRs with issues that require HQ review and approval such as C-Codes, Professional Judgment, or Dependency Override requests, make sure all necessary documentation is properly uploaded to the student account and change the request status to "Pending HQ Review" as soon as possible to allow time for any necessary ISIR corrections.

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- Keep the focus on compliance! Have you generated and reviewed your **Title IV Credit Balance Report** today? The report is updated every day and available on demand through the Employee Portal. Each DOF is required to generate and review the Title IV Credit Balance report at minimum weekly to identify and resolve Title IV credit balances as they occur. If action can be taken to reduce or eliminate the credit balance requiring resolution, the action needs to occur before the Date of Resolution specified. HQ will be initiating a refund or OS reversal on the student's account on the Date of Resolution pursuant to the authorization statements selected to resolve the Title IV credit balance.

Top Leaders	Package
Youngstown MC	80.17%
St. Petersburg MC	75.00%
Akron MC	70.00%
Sylmar MC	69.86%
Aurora MC	69.77%
Madison WI MC	69.23%
Fort Wayne MC	68.29%
Desoto MC	67.35%
Vista MC	67.27%
Arlington Heights MC	66.67%
National City MC	65.93%
Kennesaw MC	65.71%
Greenville MC	65.63%

District	FA Conduct	Pre-Package	Package
SOUTHERN CALIFORNIA	81.27%	65.11%	61.11%
OHIO VALLEY	87.89%	65.74%	58.33%
SOUTHWEST	89.12%	62.96%	57.48%
CENTRAL	83.40%	59.60%	56.37%
SOUTH ATLANTIC	86.01%	58.04%	54.36%
SOUTH CENTRAL	85.59%	60.01%	54.17%
SOUTHEAST	84.55%	62.17%	53.49%
MIDWEST	85.57%	57.21%	51.98%
NORTHWEST	82.21%	57.38%	51.56%
SOUTHERN	83.25%	70.66%	51.15%
NORTH CENTRAL	78.36%	54.90%	50.57%
NORTHEAST	90.69%	56.42%	46.54%
Grand Total	84.78%	61.38%	53.67%

Exhibit F

Rep Plan versus Actual Coaching Document

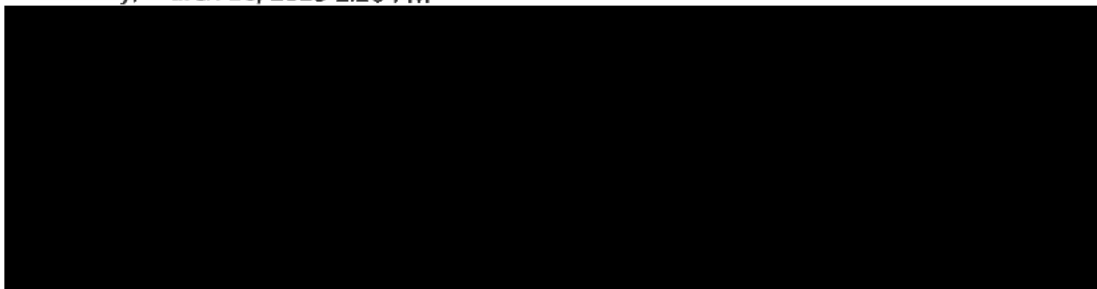
DATE OF MEETING: _____
DOR SIGNATURE: _____
REP SIGNATURE: _____
FOLLOW UP DATE: _____

Start Week: _____
 Ending Week: _____
 Rep Plan Period: SEPTEMBER 14 2015
 Applied Start Term: SEPTEMBER 14 2015
 Rep Type: All

<div style="display: flex; justify-content: space-between;"> Site: _____ _____ </div>					
Opportunities for Improvement	Action Plans for Improvement		Action Plans for Improvement		Action Plans for Improvement
First Contacts	DOR Observation	<input checked="" type="checkbox"/>	Schedule Call Blocks on Saturdays	<input type="checkbox"/>	
	Training	<input type="checkbox"/>	Increase Evening Call Blocks	<input type="checkbox"/>	
	Variance Meeting	<input type="checkbox"/>	Focus on Zone Calling	<input type="checkbox"/>	
Scheduled	DOR Observation	<input type="checkbox"/>	Observe a Seasoned Representative	<input type="checkbox"/>	eCampus: Appointment Scheduling
	Training	<input type="checkbox"/>	Practice the Phone Script	<input type="checkbox"/>	Review Schedule Job Aids
	Variance Meeting	<input type="checkbox"/>	Role-Play the Phone Script	<input type="checkbox"/>	Review Conversation Notes w/ DOR
Conducts	DOR Observation	<input type="checkbox"/>	eCampus: Questioning & Listening	<input type="checkbox"/>	Schedule Multiple Appointments
	Training	<input type="checkbox"/>	eCampus: Identify & Address Issues	<input type="checkbox"/>	Confirmation Calls
	Variance Meeting	<input type="checkbox"/>	eCampus: Appointment Setting	<input type="checkbox"/>	Observe a Seasoned Representative
Applied	DOR Observation	<input type="checkbox"/>	eCampus: Information Gathering	<input type="checkbox"/>	eCampus: Program Matching
	Training	<input type="checkbox"/>	eCampus: Identify and Address Issues	<input type="checkbox"/>	DOR Post-interview Review
	Variance Meeting	<input type="checkbox"/>	eCampus: Obtaining a Commitment	<input type="checkbox"/>	Observe a Seasoned Representative
Accepted	DOR Observation	<input type="checkbox"/>	Review 2nd & 3rd Attempts Procedures	<input type="checkbox"/>	Review Same Day Exam Attempt Procedure
	Training	<input type="checkbox"/>	Review Length of Interview Process	<input type="checkbox"/>	Review Same Day Re-attempts Procedures
	Variance Meeting	<input type="checkbox"/>	DOR Post-interview Review	<input type="checkbox"/>	
FAC Conducted	DOR Observation	<input type="checkbox"/>	eCampus: Obtaining a Commitment	<input type="checkbox"/>	eCampus: Identify & Address Issues
	Training	<input type="checkbox"/>	eCampus: Follow-up	<input type="checkbox"/>	
	Variance Meeting	<input type="checkbox"/>	DOR Post-interview Review	<input type="checkbox"/>	

Exhibit G

From: Nader Mojtabai at HQ
Sent: Thursday, March 26, 2015 1:26 PM
To:



Cc: Nader Mojtabai at HQ
Subject: Next week freindly compwtition!

As we will be attending our quarterly meeting next week, we like to set up our teams to start the first week of June's start with a lot of positive momentum!

As such we will recognize the team with the highest average per rep/FAC of:

- Pre-schedules
- Conducts
- Applies
- Pre-packaged
- Referral leads

For the week!

I would suggest that you divide your teams into two or three groups so they can compete against each other, next week!

Have fun and lets make the first week of June's enrollment a spectacular one!

Thanks,

Nader

From: Nader Mojtabai at HQ
Sent: Monday, August 24, 2015 8:02 AM
To:

Cc:
Subject: Data summary - three weeks out from start

We will review this during our calls today!

Starts					
Sep-15	Sept	September 2015			
LOCATION	2015 MP	Leads as of 8/23/15	Gross 8/23/15	Orientation	Show Rate
Corona	86	1133	105	58	55.2%
Vista	34	361	40	20	50.0%
Oxnard	52	582	77	35	45.5%
San Bernardino	147	1805	183	83	45.4%
Orange	154	1819	191	86	45.0%
Sylmar	154	1401	167	75	44.9%
Torrance	111	2779	185	65	35.1%
San Dimas	121	1185	150	49	32.7%
National City	224	1402	182	54	29.7%

Starts					
Sep-15	Sept	September 2015			
LOCATION	2015 MP	Leads as of 8/23/15	Gross 8/23/15	Orientation	Lead/Orientation
Oxnard	52	582	77	35	6.01%
Vista	34	361	40	20	5.54%
Sylmar	154	1401	167	75	5.35%
Corona	86	1133	105	58	5.12%
Orange	154	1819	191	86	4.73%
San Bernardino	147	1805	183	83	4.60%
San Dimas	121	1185	150	49	4.14%
National City	224	1402	182	54	3.85%
Torrance	111	2779	185	65	2.34%

Starts				
Sep-15	Sept			

LOCATION	2015 MP	Leads as of 8/23/15	Cognos 3rd QTR Gross	Cognos Close Rate
Oxnard	52	582	75	12.9%
National City	224	1402	176	12.6%
San Dimas	121	1185	143	12.1%
Sylmar	154	1401	149	10.6%
Vista	34	361	35	9.7%
Orange	154	1819	175	9.6%
Corona	86	1133	94	8.3%
San Bernardino	147	1805	149	8.3%
Torrance	111	2779	168	6.0%

Starts			
Sep-15	Sept		
LOCATION	2015 MP	Leads as of 8/23/15	Referrals
Vista	34	361	0.40
San Dimas	121	1185	0.34
National City	224	1402	0.27
Oxnard	52	582	0.21
Sylmar	154	1401	0.21

From: Nader Mojtabai at HQ
Sent: Monday, August 24, 2015 10:05 AM
To:



Cc:

Subject: Production

Wow! Our close rate last week was at 9.7%! AWESOME!

Below you see data just for the last week as well as QTD. If not all most of our campuses did better last week than QTD averages!

Team National City led the district with 14.7% close wow! This was followed by Team Oxnard. We had two campuses tied for the third place, Team Corona and Team San Dimas!

Both Team Orange and Team Sylmar close above 10% as well!

Team Torrance is on the rise and see the significant improvement that they made just last week alone!

Team Vista and Team San Bernardino are starting this week strong to continue their progress!

Lets keep this positive momentum going and have a very big week this week! We can!

Thank you [REDACTED] for providing the data!

Thanks,

Nader

Week 33 Data:

2015- 33

	COL				REF				Media Group				%
	First	Scheduled	Conducted	Applied	First	Scheduled	Conducted	Applied	First	Scheduled	Conducted	Applied	
Corona	156	70	13	12	4	6	4	5	162	79	20	19	11.
National City	177	60	21	23	6	5	4	3	184	67	26	27	14.
Orange	201	84	18	20	6	14	3	4	212	98	21	24	11.
Oxnard	85	34	9	9	4	3	2	2	90	37	11	11	12.
San Bernardino	257	71	14	11	2	1	0	0	287	75	14	11	3.
San Dimas	159	53	8	14	7	7	6	5	171	63	15	20	11.
Sylmar	198	69	27	20	1	0	0	1	200	71	28	22	11.
Torrance	308	106	17	21	6	8	6	6	329	115	23	27	8.
Vista	56	15	5	2	4	3	2	2	63	20	8	4	6.
Total	1,597	562	132	132	40	47	27	28	1,698	625	166	165	9.

QTD Data:

2015-3

	COL				REF				QTD				
	First	Scheduled	Conducted	Applied	First	Scheduled	Conducted	Applied	First	Scheduled	Conducted	Applied	
Corona	1,139	480	80	79	16	28	12	13	1,168	513	95	94	6
National City	1,421	535	149	149	22	19	12	14	1,525	588	177	176	1
Orange	1,832	703	142	148	60	110	29	26	1,950	839	177	175	
Osmond	590	231	73	64	26	32	9	11	624	264	82	75	1
San Bernardino	1,821	589	123	137	16	18	4	8	1,977	641	132	149	
San Diego	1,194	479	106	114	29	33	25	26	1,297	536	134	143	1
Sylmar	1,421	495	153	127	18	18	11	12	1,531	548	178	149	
Torrance	2,798	861	157	150	21	23	18	13	2,895	906	179	168	
Vista	361	133	43	29	15	13	9	6	386	151	53	35	
Total	12,577	4,508	1,026	997	223	294	129	129	13,353	4,986	1,207	1,164	

From: Nader Mojtabai at HQ
Sent: Wednesday, September 02, 2015 3:55 PM
To: [REDACTED]

Cc: [REDACTED]
Subject: FW: Production

We continue to climb! We are at 12.2% close rate! This is awesome or what!

Do I hear 13%? Do I hear 14%?

Awesome job to Team Oxnard for continuing to lead the district! Followed by Team Vista and Team National City!

Lets finish the week strong! We need a lot more appointments for the rest of the week! ☺!

Thanks,

Nader

[REDACTED]
Sent: Wednesday, September 02, 2015 10:25 AM
To: Nader Mojtabai at HQ
Subject: Production

	Monday				Tuesday				Wednesday	Thursday	Friday	Saturday	Week-to-Date			
	First Scheduled	Conducted	Applied		First Scheduled	Conducted	Applied		Scheduled	Scheduled	Scheduled	Scheduled	First Scheduled	Conducted	Applied	%
Corona	26	7	3	3	22	13	2	3	13	9	7	2	48	51	5	6 12.5%
National City	32	9	5	7	41	19	4	4	12	7	7	0	73	54	9	11 15.1%
Orange	46	16	7	6	34	15	3	4	16	10	4	4	80	65	10	10 12.5%
Oxnard	14	6	4	5	14	6	1	2	5	4	1	2	28	24	5	7 25.0%
San Bernardino	48	11	3	2	42	16	6	8	17	6	6	2	90	58	9	10 11.1%
San Dimas	20	16	3	2	25	9	2	3	13	4	5	3	56	50	5	5 8.9%
Sylmar	37	17	8	6	32	22	1	3	15	8	2	1	69	65	9	9 13.0%
Torrance	71	17	3	2	62	35	14	10	28	11	2	4	133	97	17	12 9.0%
Vista	11	6	3	2	7	3	0	1	4	3	1	1	19	18	3	3 15.8%
Total	315	105	39	35	279	138	33	38	123	62	35	19	596	482	72	73 12.2%

From: Nader Mojtabai at HQ
Sent: Tuesday, September 08, 2015 9:08 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Production

We finished the week with 10.9% close rate! Awesome job everybody!

The leaders for the week are:

Team Oxnard with 15.3%

Team Corona with 13.1%

Team Sylmar and Team National City both with over 12%

It is great to win as a team!

Appointments and confirmations to increase their show rate continue to be the name of the game!

BTW _ Check you ACA...our TV Close rate as a district has gone down!! You may want to use the s-3 advance find to do a phone-a-thon for TV leads!

Thanks,

Nader

From: [REDACTED]
Sent: Tuesday, September 08, 2015 8:57 AM
To: Nader Mojtabai at HQ
Cc: [REDACTED]
Subject: Production

Week 35 Data:

2015- 35

	CDL				REF				Media Group				
	First	Scheduled	Conducted	Applied	First	Scheduled	Conducted	Applied	First	Scheduled	Conducted	Applied	
Corona	119	57	13	12	2	3	2	4	122	66	15	16	13.1%
National City	184	70	20	19	1	2	2	3	190	76	24	23	12.1%
Orange	202	71	15	16	5	11	4	1	208	82	19	19	9.1%
Oxnard	65	19	4	6	6	7	5	5	72	26	9	11	15.3%
San Bernardino	197	65	17	21	4	5	2	2	204	77	20	24	11.8%
San Diego	134	63	10	14	1	1	0	1	137	67	11	16	11.7%
Sylmar	180	78	14	17	11	11	8	7	197	95	24	24	12.2%
Torrance	327	121	29	23	6	9	4	3	333	133	35	27	8.1%
Vista	55	20	9	4	0	2	0	1	55	22	9	5	9.1%
Total	1,463	564	131	132	36	56	27	27	1,518	644	166	165	10.9%

Quarter to Date Data:

2015- 3

	CDL				REF				Media Group				
	First	Scheduled	Conducted	Applied	First	Scheduled	Conducted	Applied	First	Scheduled	Conducted	Applied	
Corona	1,417	595	99	99	22	37	16	18	1,455	639	118	119	8.2%
National City	1,779	680	189	186	25	23	15	17	1,906	746	225	220	11.5%
Orange	2,273	368	176	164	78	135	34	31	2,412	1,027	216	218	9.0%
Oxnard	726	289	93	87	39	45	16	18	775	335	109	105	13.5%
San Bernardino	2,262	739	162	181	30	34	11	16	2,439	815	179	203	8.3%
San Diego	1,490	621	132	144	36	41	31	34	1,605	690	167	182	11.3%
Sylmar	1,782	642	134	157	30	31	21	20	1,921	719	222	188	9.8%
Torrance	3,459	1,130	211	196	38	41	30	20	3,575	1,199	250	224	6.3%
Vista	466	177	61	40	16	15	10	7	493	197	72	47	9.5%
Total	15,654	5,741	1,307	1,274	314	402	184	181	16,581	6,367	1,558	1,506	9.1%

Exhibit H

From: Paula Cherry at HQ
Sent: Tuesday, September 01, 2015 8:42 AM
To: Nader Mojtabai at HQ; [REDACTED]
Cc: Shantel Hickie at HQ; Dean Kempter at HQ
Subject: FW: Please read

This student called here this morning very upset about the being able to go into the bachelor's program in Vista. He stated that he was told he need to get 6 students to start the program and now that he has 6 is being told 10. He also stated that some of the 6 were taking NSA courses waiting for the bachelor's degree to start.

Dr. Paula Cherry
National Dean
317-706-9287

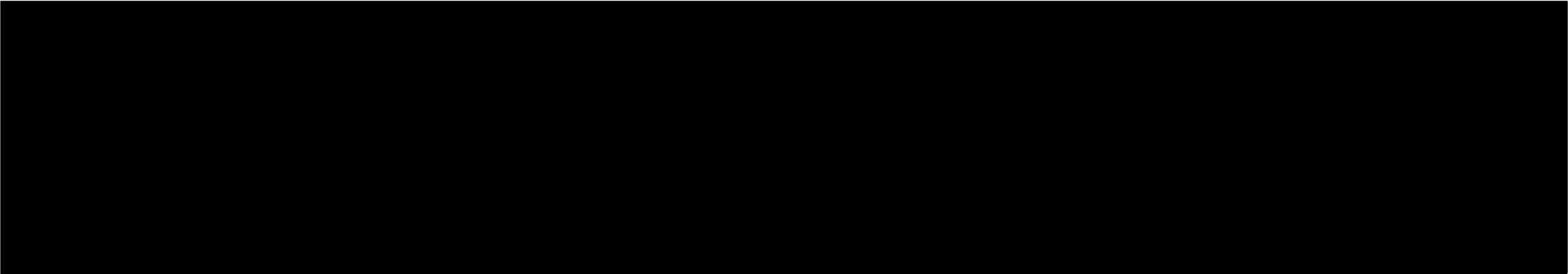
[REDACTED]
Sent: Tuesday, September 01, 2015 11:31 AM
To: Paula Cherry at HQ
Subject: Please read

Good Morning

I am One of six students that was affected by your decision to not start a bachelors program for electrical engineering at the Vista campus in California. To start off the Six students that are ready to start this course are comprised of Combat veterans who took the time to serve there country and sought time from your establishment to better themselves and further our educations. We have all completed our associate degrees at the vista campus and are ready to move forward, however You have let us down not once but three times now. We as a collective have been told time and time again that the Bachelors course will start the next semester, at last we saw hope we have six strong dedicated students that will see this out to the end if we are given a chance. I feel very strongly about this that if you were to GRANT us our chance at the bachelors degree that all six of us will finish , we all have sacrificed a great deal some more then others and have defended ITT-Tech in court when it came to the VA issue, It is time you keep your promise and hold up to your end of the bargain by granting us our chance at our degree.

Thank you
[REDACTED]

Exhibit I



From: Nader Mojtabai at HQ
Sent: Tuesday, September 01, 2015 9:48 AM
To: Paula Cherry at HQ; [REDACTED]
Cc: Shantel Hickle at HQ; Dean Kempter at HQ
Subject: RE: Please read


The Vista campus. Small market, has been trying to start this program a couple of times. Last quarter the classes were canceled last minute. Campus has taken the following actions to increase the enrollment in this program for the September start:

- Asked their Sister Campus – The National City campus was approached to see if Vista campus could receive a list of graduates that live closer to the Vista campus so we could contact those graduates. No graduates were identified.
- Ask the students to see if they can get us referrals

Last week we came to the conclusion that we have done all we could to increase the pool of candidates. At that point, Vista Team believed that they have exhausted all their options and could not offer a class bigger than six in September. Being this a Bachelor class, the pool is known to us that we can work with to increase our class size.

Since small class size is not as effective in fostering good educational environment, we try to avoid it when we can.

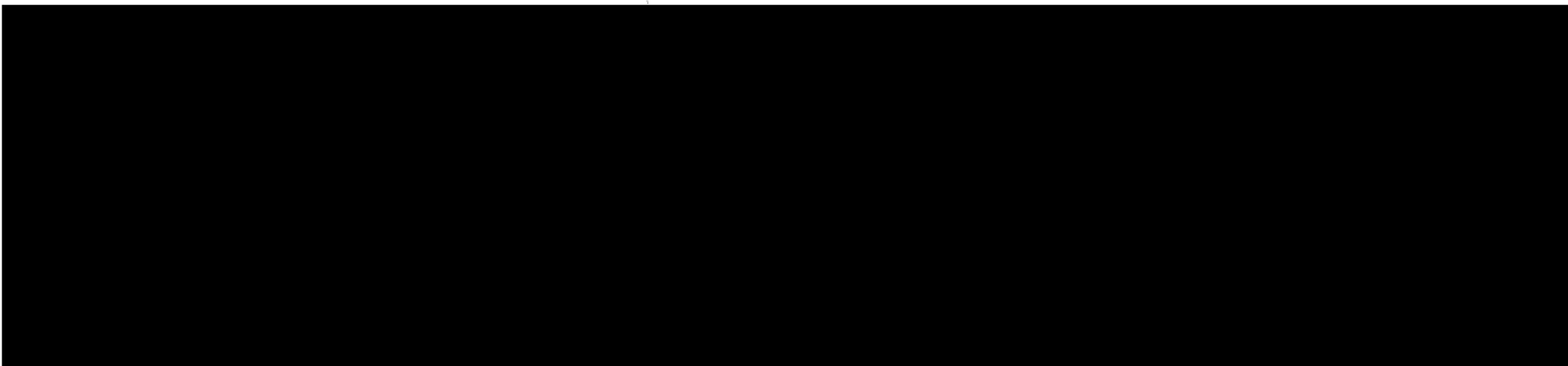
As such the decision was made that the best thing second to offering the class is to inform the students now that we are not offering it in September. This will allow them to have ample time to plan to attend any of the sister campuses close to the Vista campus.



Thanks,

Nader

Exhibit J



Sent: Tuesday, September 01, 2015 3:24 PM

To: [REDACTED]
Subject: Re: Financial Aid Appointment

Good evening [REDACTED]

As always I respect your position as Director at the school, but unfortunately this seems to be out of your hands for this (seems) as if this is the second or third time this has happened in reference to the Bachelors program being cancelled. Whether you know this or not (I hope you do) we change and alter out lives to be enrolled at your school, where we have infinite choices to choose from for our education We feel as if you and your team is not trying hard enough and I'm looking to go to the top to resolve this. ALL of your Bachelor students feel the same way and I can not allow this to go any further. Correct me if I'm wrong, but we were told to have x amount of students to be enrolled to have the bachelors program present... which we did.... and nothing has changed. So we jump through loop holes to not only help your school, but start a Bachelors program of GOOD students who will likely start a trend of successful Bachelors students graduating from our campus. This maybe out of your hands but regardless I'm going to make sure this doesn't go unheard.

I will let you know if I want to meet with you or speak with you. Thanks.

[REDACTED]

[REDACTED]

Sent: Tuesday, September 01, 2015 1:21 PM

To: [REDACTED]
Subject: Re: Financial Aid Appointment

Hello [REDACTED],

I was going to make it a point to stop by today and finish the enrollment but I was notified from other students that the Bachelor's program will be cancelled. I am really not happy to hear about this and ensures that I will not be coming in anytime soon. I am very upset !! With this being said, I would like the emails and phone numbers of ITT corporate headquarters, as well as, the number and email to the Director. I hope you understand I'm not angry at you, but will show my frustration to whoever is in charge,

[REDACTED]

On Mon, Aug 31, 2015 at 12:41 PM, [REDACTED] wrote:

Hi [REDACTED],

I hope you're feeling better.... Let me know when you can come back to finish financial aid, ok?!

Thanks ☺

[REDACTED], Senior Admissions Representative, Vista Campus

ITT Technical Institute | 440 S. Melrose Drive | Vista