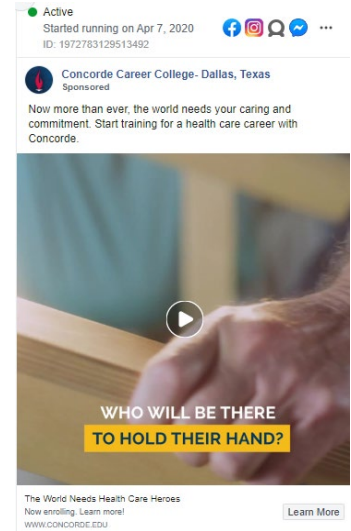


## Appendix A

### COVID-19 Specific Ads

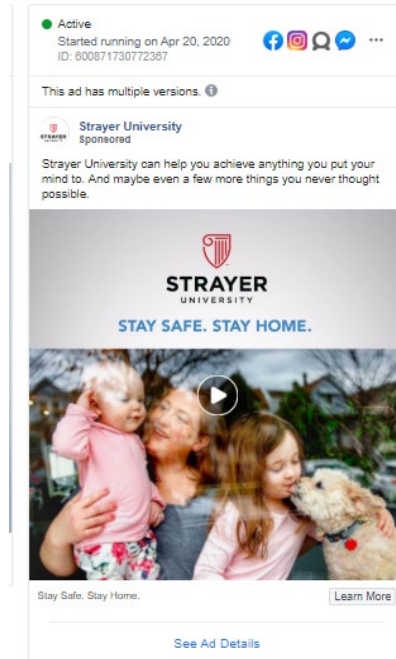
Examples of COVID-19 specific advertisements are depicted below.



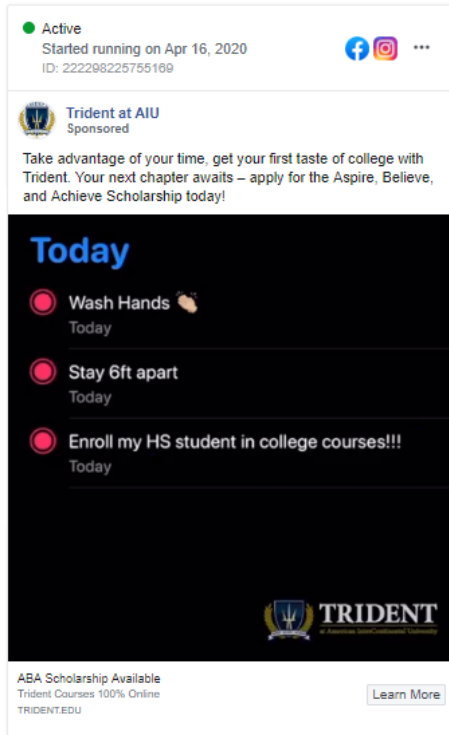
[images above from left to right: Capella University “Uncertain Times” advertisement, downloaded April 20, 2020, Concorde Career College “Health Care Heroes” advertisement, downloaded April 20, 2020]



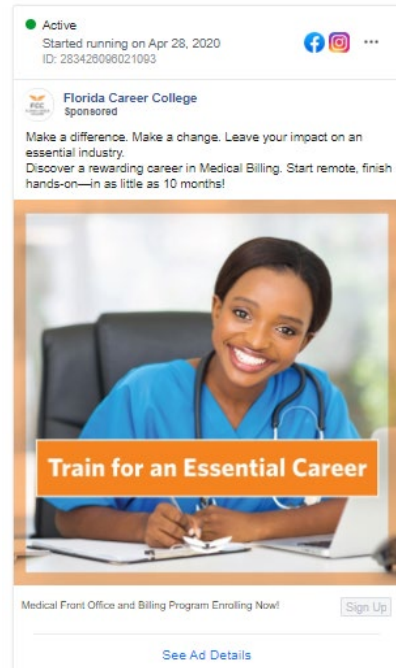
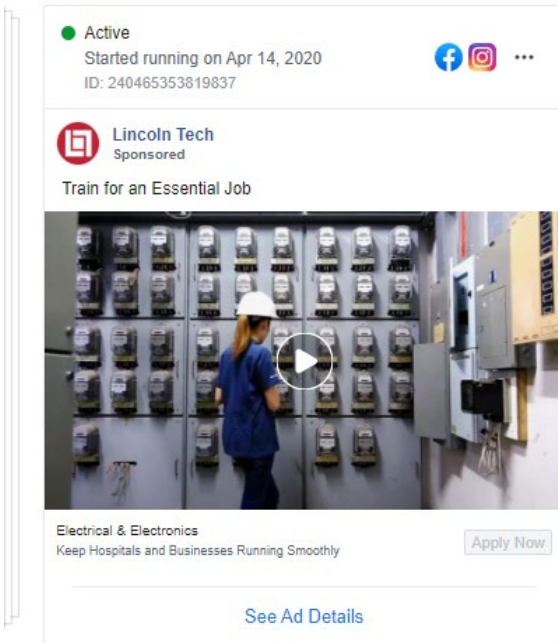
[images above from left to right: DeVry University homeschooling advertisement, downloaded April 21, 2020, Fortis College advertisement explicitly mentioning COVID-19, downloaded April 21]



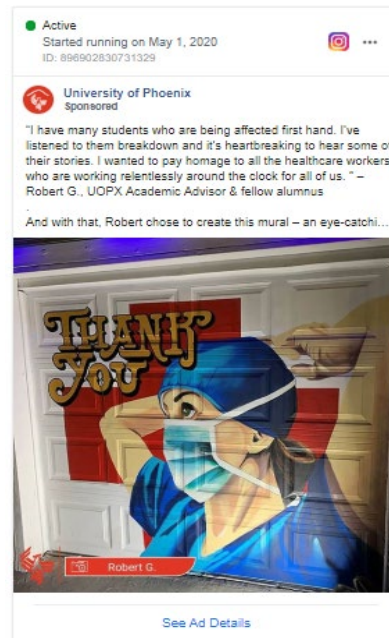
[images above from left to right: Keiser University “Health Care Heroes” advertisement, downloaded April 27, 2020, Strayer University “Stay Safe. Stay Home” advertisement, downloaded April 29, 2020]



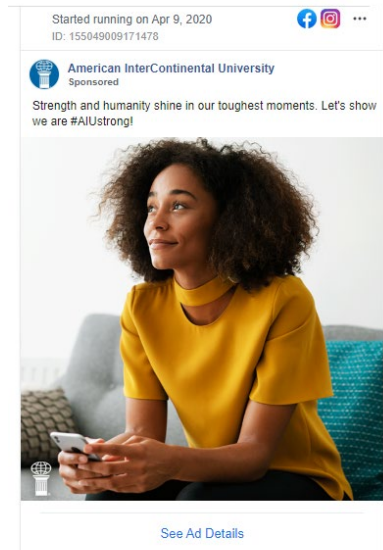
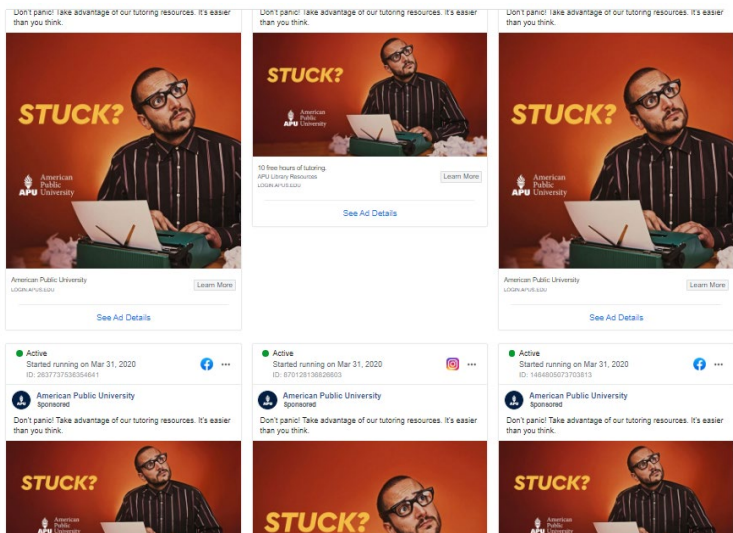
[images above from left to right: Trident University COVID-19 advertisement, downloaded April 29, 2020, Walden University COVID-19 advertisement, downloaded April 29, 2020]



[images above from left to right: Lincoln Tech “Essential Job” advertisement, downloaded April 29, 2020, Florida Career College “Train for an Essential Career” advertisement, downloaded April 29, 2020,]



[images above from left to right: Ultimate Medical Academy COVID-19 advertisement, downloaded April 29, 2020, University of Phoenix COVID-19 related advertisement, downloaded April 30, 2020,]





[images above from left to right: American Public University advertisement, downloaded April 10, 2020, American InterContinental University “Toughest Moments” advertisement, downloaded April 13, 2020]

## Healthcare Industry Specific Ads

Examples of healthcare industry specific advertisements are depicted below.

● Active  
Started running on Mar 18, 2020  
ID: 552860775345271



 **Capella University**  
Sponsored

Improved work performance: Learn about the positive impact Capella has on our graduates' work experiences.





Support your employees' goals through education. Our breadth of offerings focuses on functional expertise, business acumen, and a solid understanding of contemporary health care... [Learn More](#)

ES.CAPELLA.EDU/IFOR-EMPLOYERS/DEGREE/HEALTHCARE


[See Ad Details](#)

● Active  
Started running on Mar 18, 2020  
ID: 636972290206412



 **Capella University**  
Sponsored

Capella graduates say that they are better equipped to be successful employees.



Over 400 graduates told us about their Capella experience. Read the results. Our breadth of offerings focuses on functional expertise, business acumen, and a solid understanding of contemporary health care... [Learn More](#)

ES.CAPELLA.EDU/IFOR-EMPLOYERS/DEGREE/HEALTHCARE

[See Ad Details](#)

[image above: Capella University healthcare related advertisements, downloaded April 20, 2020]

● Active  
Started running on Apr 7, 2020  
ID: 2582379265382897



 **Concorde Career College- Dallas, Texas**  
Sponsored

Now more than ever, the world needs your caring and commitment. Start training for a health care career with Concorde.



**BE PART OF  
THE SOLUTION**



● Active  
Started running on Apr 7, 2020  
ID: 2623001431305463



 **Concorde Career College- Dallas, Texas**  
Sponsored

Now more than ever, the world needs your caring and commitment. Start training for a health care career with Concorde.



**THE WORLD  
NEEDS YOU**




[image above: Concorde Career College healthcare related advertisements, downloaded April 20, 2020]

Active  
Started running on Apr 1, 2020  
ID: 267140210954325

This ad has multiple versions.

**ECPI University**  
Sponsored

Become an important part of a healthcare team in as little as 15 months! Learn important skillsets while working with doctors and registered nurses.



**CAREGIVERS NEEDED.  
BECOME A NURSE.**

Classes Starting Soon!  
CLASSES STARTING SOON!

[Learn More](#)

[See Ad Details](#)

Active  
Started running on Apr 20, 2020  
ID: 2360379764261111

This ad has multiple versions.

**Fortis Colleges and Institutes**  
Sponsored

We have temporarily transitioned to virtual classroom delivery. You're one step away from starting your career as a Nurse.



**FORTIS**

**1**

**DECISION  
TO CHANGE  
YOUR LIFE**

[image above from left to right: ECPI University healthcare related advertisement, downloaded April 21, 2020, Fortis College healthcare related advertisement, downloaded April 21, 2020]

Active  
Started running on Apr 3, 2020  
ID: 312347933070406

**Herzing University Online**  
Sponsored

\*\*Herzing University ranks among the best Online Bachelor's and MBA programs by U.S. News & World Report for 2020.\*\*



**There is no limit to what we can accomplish.**

#HPOSSIBLE

**HERZING UNIVERSITY**

Earn Your Degree Online from Herzing University!  
Earn your degree in some of today's fastest-growing career fields including nursing, healthcare, technology, business and public safety.

[Learn More](#)

[See Ad Details](#)

Active  
Started running on Apr 21, 2020  
ID: 599579443978808

**University of Phoenix**  
Sponsored

Learn new ways to provide quality care with a CCNE accredited program.

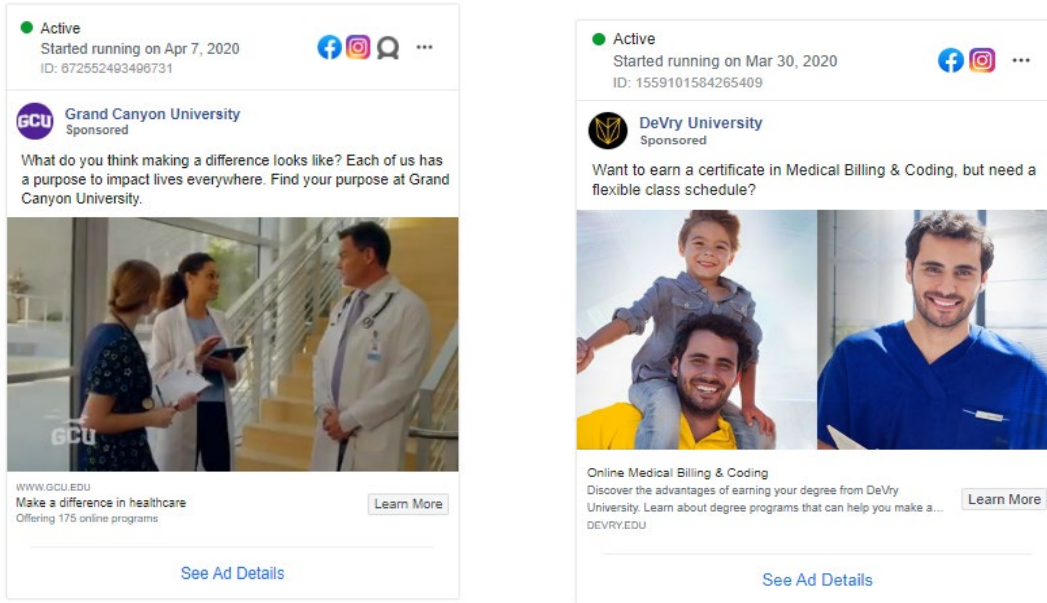


Earn your RN to BSN.  
Enhance your career.  
PHOENIX.EDU

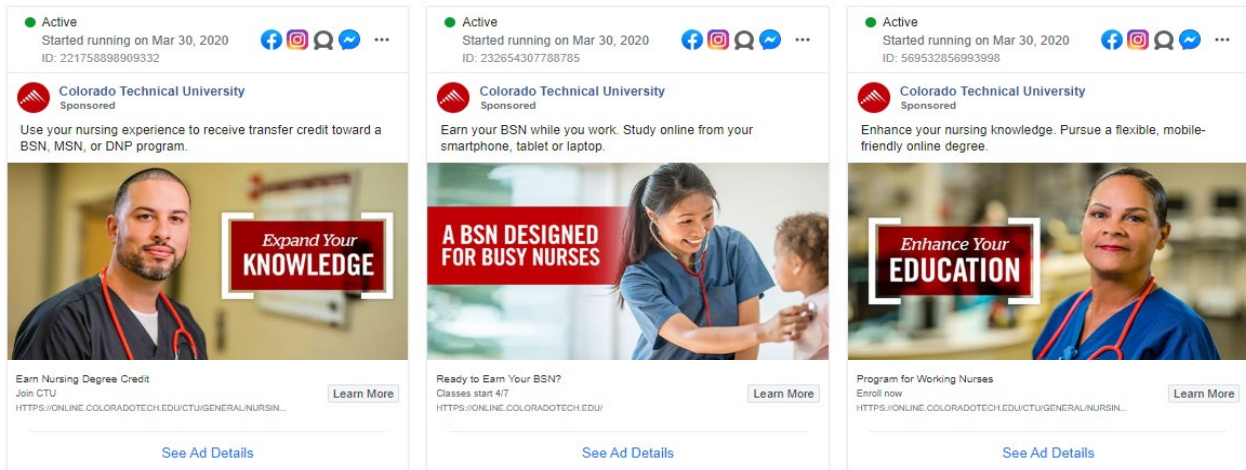
[Apply Now](#)

[See Ad Details](#)

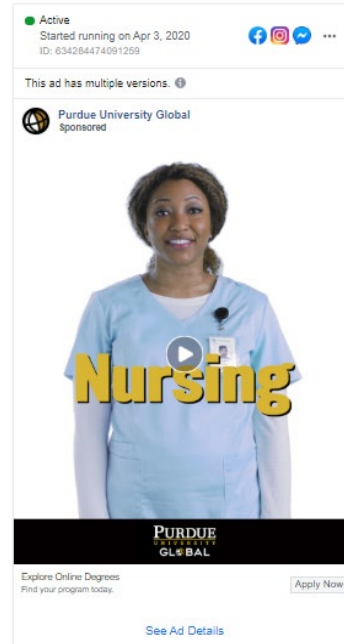
[images above from left to right: Herzing University healthcare related advertisement, downloaded April 22, 2020, University of Phoenix healthcare related advertisement, downloaded April 30, 2020]



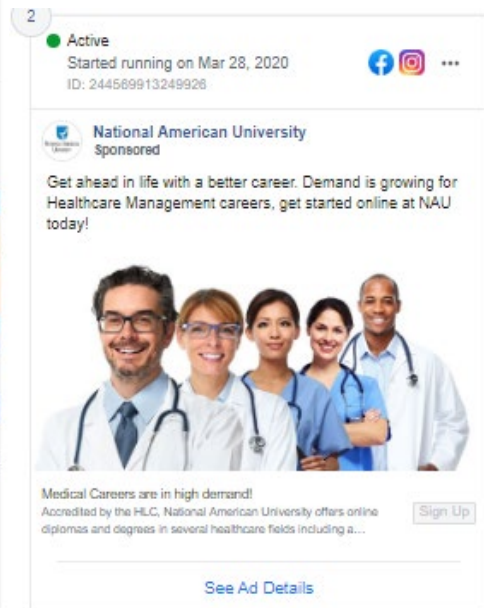
[images above from left to right: Grand Canyon University healthcare related advertisement, downloaded May 5, 2020, DeVry University healthcare related advertisement, downloaded April 21, 2020]



[image above: Colorado Technical University healthcare related advertisements, downloaded April 13, 2020]

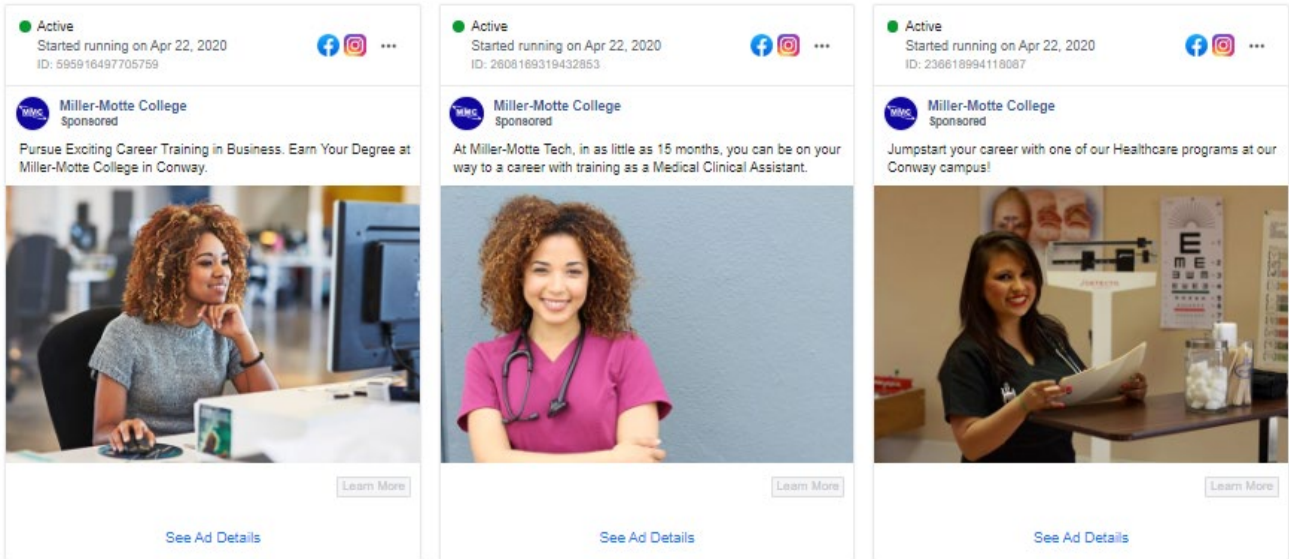


[images above from left to right: Grantham University healthcare related advertisement downloaded April 22, 2020, Purdue University Global healthcare related advertisement, downloaded April 27, 2020]

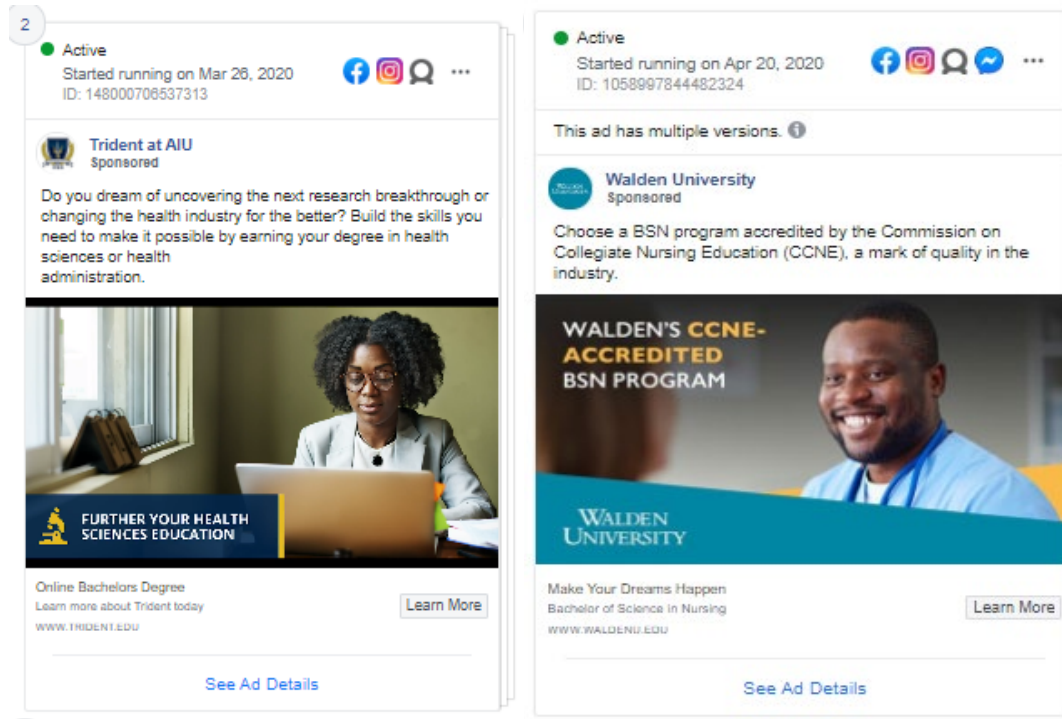


[image above: Keiser University healthcare related advertisement, downloaded April 27, 2020, National American University healthcare related advertisement, downloaded April 27, 2020]





[image above: Miller-Motte College healthcare related advertisements, downloaded April 27, 2020]




[image above: Trident University healthcare related advertisement, downloaded April 29, 2020, Walden University healthcare related advertisement, downloaded April 29, 2020]

● Active  
Started running on Apr 23, 2020  
ID: 229981211404312

This ad has multiple versions. ⓘ

**American Career College**  
Sponsored

Turn Your Passion for Helping Others Into a Career - Train to Become an LVN at ACC! Evening, Weekend, & Online Classes Available.



LVN Program at ACC  
Online Tours & Appointments

[Learn More](#)


[See Ad Details](#)

● Active  
Started running on Apr 23, 2020  
ID: 257799458693008

This ad has multiple versions. ⓘ

**American Career College**  
Sponsored

9 Month Medical Billing & Coding Program. Classes Start Online. Learn More Now!



Study Medical Billing & Coding  
Virtual Interviews

[Learn More](#)


[See Ad Details](#)

[image above: American Career College healthcare related advertisements, downloaded April 29, 2020]

● Active  
Started running on Apr 27, 2020  
ID: 869035050186455

**Ultimate Medical Academy**  
Sponsored

UMA's Health Sciences - Pharmacy Technician program trains individuals for a career. As part of the program, students will get hands-on training before they graduate. Learn more to see if this is the right path for you.



We're Ready. Are You?  
Become a pharm tech. We can help.


[Learn More](#)

[See Ad Details](#)

● Active  
Started running on Apr 27, 2020  
ID: 3185822518118362

**Ultimate Medical Academy**  
Sponsored

UMA's Health Sciences - Pharmacy Technician program trains individuals for a career. As part of the program, students will get hands-on training before they graduate. Learn more to see if this is the right path for you.



We're Ready. Are You?  
Become a pharm tech. We can help.


[Learn More](#)

[See Ad Details](#)

● Active  
Started running on Apr 24, 2020  
ID: 677549392812507

**Ultimate Medical Academy**  
Sponsored

UMA's Health Sciences - Pharmacy Technician program trains individuals for a career. As part of the program, students will get hands-on training before they graduate. Learn more to see if this is the right path for you.



We're Ready. Are You?  
Become a pharm tech. We can help.

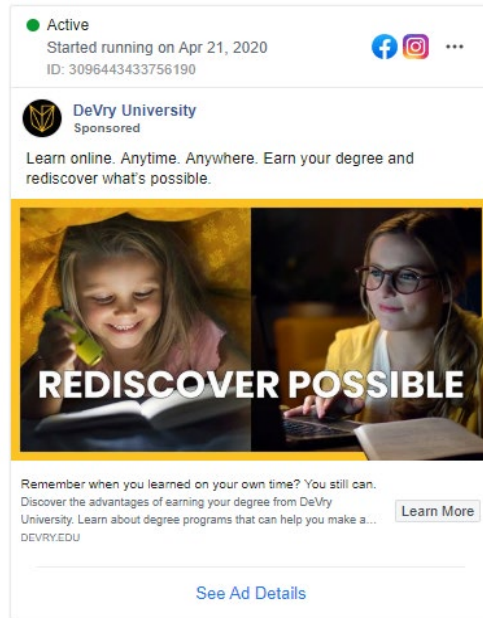
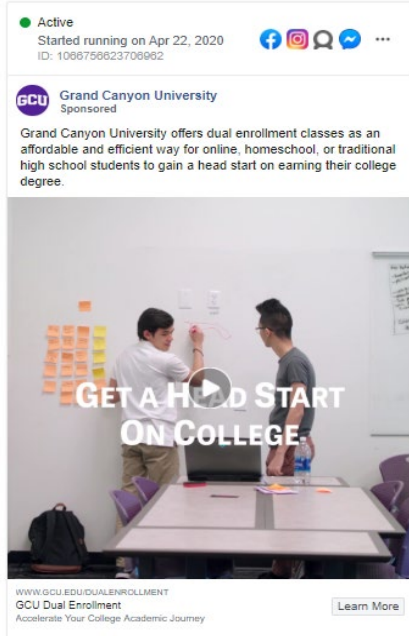
[Learn More](#)

[See Ad Details](#)

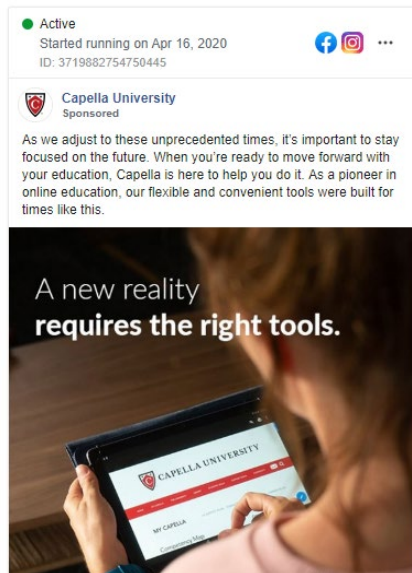
[image above: Ultimate Medical Academy healthcare related advertisements, downloaded April 29, 2020]

## Access to Online Learning Ads

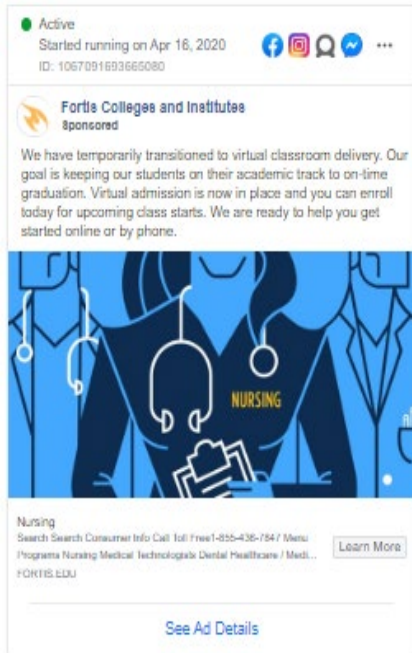
Examples of advertisements touting schools' online degree programs are depicted below.



[image above: Grand Canyon University advertisement targeting high school students, downloaded May 5, 2020, DeVry University online program advertisement, downloaded April 21, 2020]



[images above from left to right: Capella University online program advertisement, downloaded April 20, 2020, ECPI University online program advertisement, downloaded April 21, 2020]



[images above from left to right: Fortis College online program advertisement, downloaded April 21, 2020, Grantham University online program advertisement, downloaded April 22, 2020]



[images above from left to right: Herzing University online program advertisement, downloaded April 22, 2020, Purdue University Global online program advertisement, downloaded April 27, 2020]

Active  
 Started running on Apr 13, 2020  
 ID: 646184189509723

Keiser University  
 Sponsored

Now is your time to enroll! Reach for your career goals with one of our in-demand online degree programs. Click to learn more or call (888) 788-3567 to get started today!

**EDUCATION TO FIT YOUR LIFE**



KEISER UNIVERSITY ONLINE

Convenient. Flexible. 100% Online Options  
 Request Info Today.  
 KEISER-EDUCATION.COM [Learn More](#)

[See Ad Details](#)

Active  
 Started running on Apr 7, 2020  
 ID: 1074791799570536

National American University  
 Sponsored

Highly focused, top-quality education with the convenience and flexibility of online study. 100% online Doctoral degree in Strategic Security from the Henley-Putnam School of Strategic Security. Call or Click today!



Strategic Security Studies, 100% Online  
 Call now! Courses available 24/7. Quarterly starts to allow for TDY's, deployments, and PCS moves. Professional faculty includes leader... [Learn More](#)

[See Ad Details](#)

[images above from left to right: Keiser University online program advertisement, downloaded April 27, 2020, National American University online program advertisement, downloaded April 27, 2020]


Active  
 Started running on Apr 24, 2020  
 ID: 232741944467524

South University  
 Sponsored

Earn your Master of Science in Nursing (MSN) degree with Specialization in Family Nurse Practitioner program online

In your FNP classes, you can learn preventive care, diagnosis, treatment, and health promotion for all developmental stages.

What are you waiting for? Your future is calling!



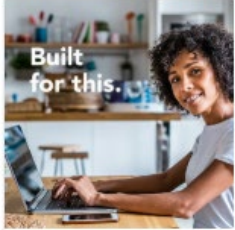
Classes start soon  
 Open Enrollment  
 SOUTHUNIVERSITY.EDU [Learn More](#)

[See Ad Details](#)

Active  
 Started running on Apr 20, 2020  
 ID: 2945318705556702

Strayer University  
 Sponsored

During these challenging times, we're committed to providing a consistent, high quality learning experience. Built to be streamed on any device, you'll learn through documentary-style course content that makes an impact.



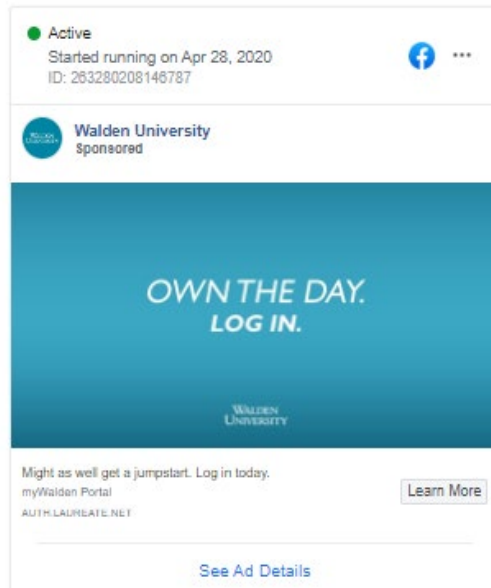
**Built for this.**

Curriculum created to be online.

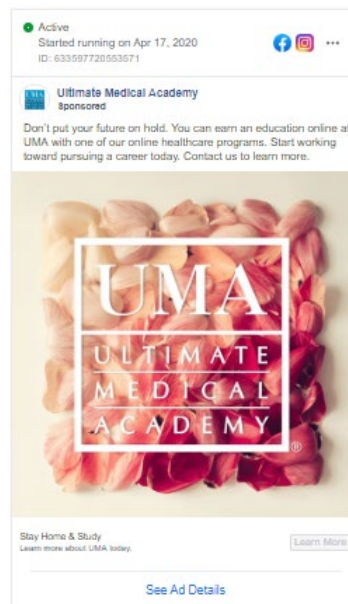
Here To Support You [Apply Now](#) Documentary-Style Course Content [Apply Now](#)

[See Ad Details](#)


[images above from left to right: South University online program advertisement, downloaded April 27, 2020, Strayer University online program advertisement, downloaded April 29, 2020]




[images above from left to right: Walden University online program advertisement, downloaded April 29, 2020, American Career College online program advertisement, downloaded April 29, 2020]



[images above from left to right: Florida Career College online program advertisement, downloaded April 29, 2020, Ultimate Medical Academy online program advertisement, downloaded April 29, 2020]


**University of Phoenix**  
 Sponsored


Prepare for opportunities in nursing by finishing an MSN degree in as little as 18 months.



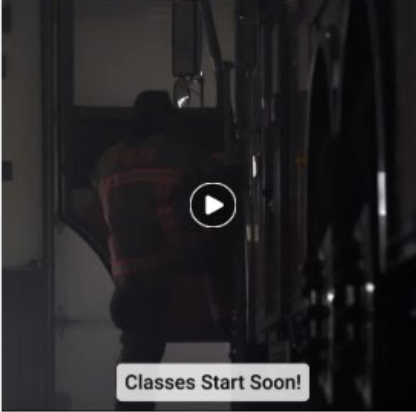
Earn your MSN online.  
 One 6-week course at a time  
 PHOENIX.EDU

[Apply Now](#)

[See Ad Details](#)


**American Military University**  
 Sponsored

AMU offers 200+ online degrees and certificates - both undergraduate and graduate programs. [Learn more!](#)




Flexible and Affordable Online Degree Programs  
 AMU.APLUS.EDU

[Learn More](#)

[See Ad Details](#)

[images above from left to right: University of Phoenix online program advertisement, downloaded April 30, 2020, American Military University online program advertisement, downloaded April 10, 2020]

 Active  
 Started running on Apr 10, 2020  
 ID: 149525133157975


**Full Sail University**  
 Sponsored


As soon as May 4, you could be making moves toward your dream career. Accelerated online degrees start monthly at Full Sail University.




Real-World Learning  
 Your vision. Your future. Get started now.  
 WWW.FULLSAIL.EDU

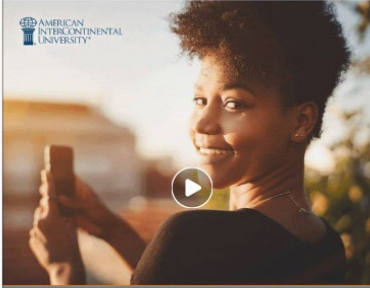
[Learn More](#)

[See Ad Details](#)

 Active  
 Started running on Apr 1, 2020  
 ID: 1168810783464374


**American InterContinental University**  
 Sponsored

In just about 10 minutes, you could apply online for classes at AIU.




**What's Holding You Back From Pursuing The Degree You Want?**


Classes start May 6th!  
 HTTPS://WWW.AIUONLINE.EDU

[Learn More](#)

[images above from left to right: Full Sail University online program advertisement, downloaded April 10, 2020, American InterContinental University online program advertisement, downloaded April 13, 2020]

 **Colorado Technical University**  
Sponsored

U.S. News and World Report ranked several CTU programs among its lists for Best Online Programs for 2019



Classes Start Soon  
Learn more about CTU.  
[HTTPS://ONLINE.COLORADOTECH.EDU](https://online.coloradotech.edu)

[Learn More](#)

[See Ad Details](#)

[image above: Colorado Technical University online program advertisement, downloaded April 13, 2020]

### *Low Cost/Scholarships Promised Ads*

Examples of advertisements that promise low cost and scholarships are depicted below.

● Active  
Started running on Apr 9, 2020  
ID: 214392969865926



 **Capella University**  
Sponsored

With FlexPath, you can earn your master's degree in 12 months and under \$11,500.



Assumes accelerated pace. Price varies by your pace and transfer credits. Other fees apply.

Step Up Your Game  
[CAPELLA.EDU](https://capella.edu)

[Learn More](#)

● Active  
Started running on Apr 14, 2020  
ID: 1154137498258314



 **Grantham University**  
Sponsored



**OVER 50+ PROGRAMS AT THE NATION'S  
LOWEST TUITION RATES**



[images above from left to right: Capella University “FLEXPATH” advertisement, downloaded April 20, 2020, Grantham University advertisement touting low tuition rates, downloaded April 22, 2020]

● Active  
Started running on Apr 22, 2020  
ID: 1393055280882075

**GCU** Grand Canyon University  
Sponsored

Thanks for your interest in GCU! Complete your information to learn about scholarship eligibility and more. With a rapidly expanding campus and a vibrant, diverse student body, you belong in #LopeCountry!



GCU.EDU  
Update Your Information Today  
Thanks for your interest in GCU! Tell us more about yourself. [Learn More](#)

[See Ad Details](#)

● Active  
Started running on Mar 23, 2020  
ID: 1096882047327457

**HU** Herzing University Online  
Sponsored

Enrollment fee waived now through April 30. With careers in healthcare projected to rise, Herzing is at the ready to get you the high quality, career-oriented skills employers are looking for.



Earn Your Medical Assistant Diploma Online  
Get the competitive edge with Herzing's Medical Assistant diploma. [Learn More](#)  
GO.HERZING.EDU

[See Ad Details](#)

[images above from left to right: Grand Canyon University advertisement discussing scholarships, downloaded May 5, 2020, Herzing University advertisement discussing enrollment fee waiver, downloaded April 22, 2020]


● Active  
Started running on Mar 30, 2020  
ID: 648078832430618

**Strayer University**  
Sponsored


Get rewarded for your hard work. Did you know you can save up to 25% on your bachelor's degree tuition with Strayer Graduation Fund?\*

\* Eligibility and participation rules apply.

Finally, an affordable education.



Finally, an affordable education  
STRAYER.EDU [Apply Now](#)



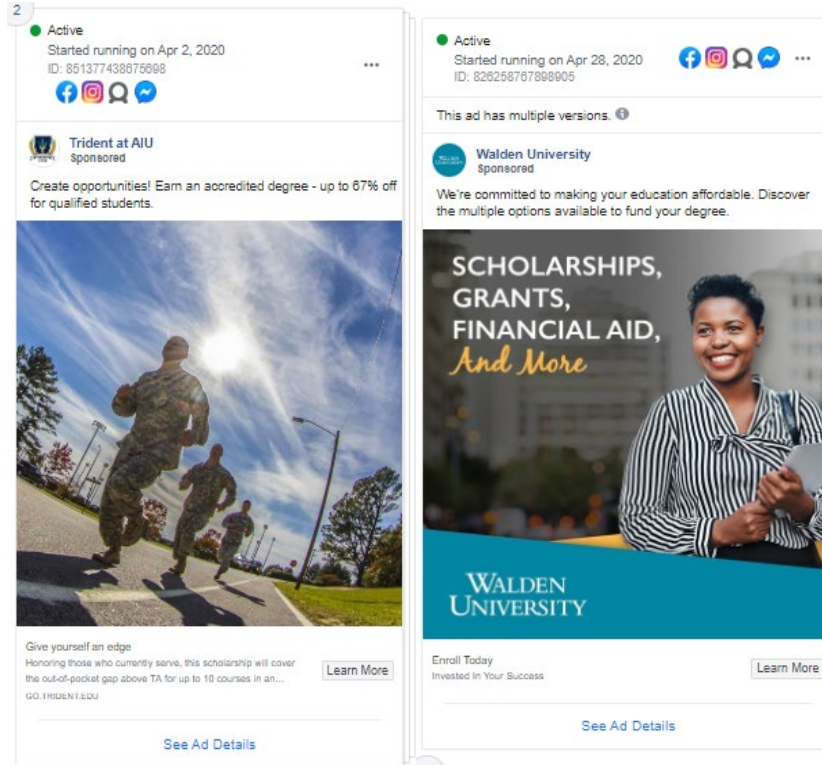
With up to **>**  
% savings.\*

\* Eligibility and participation rules apply.

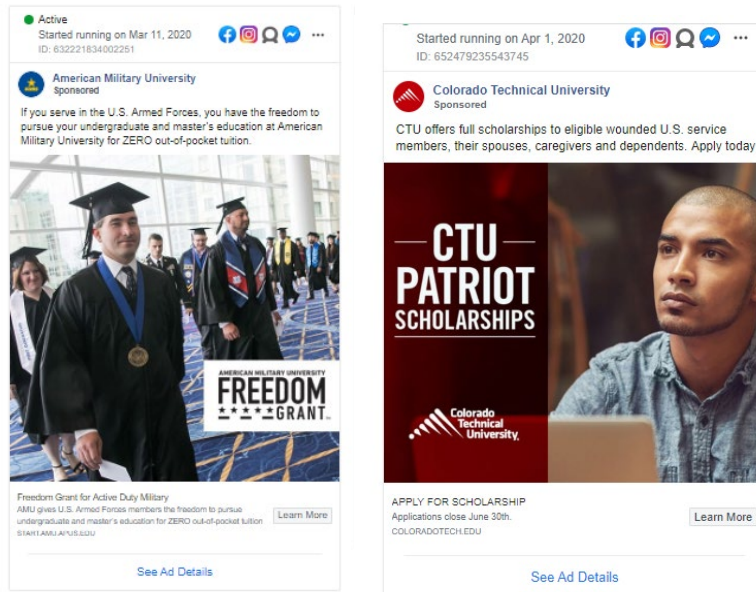
With up to 25% in savings.\* \* Eligibilit...  
STRAYER.EDU [Apply Now](#)

[See Ad Details](#)

[image above: Strayer University advertisement discussing the “Strayer Graduation Fund,” downloaded April 29, 2020]



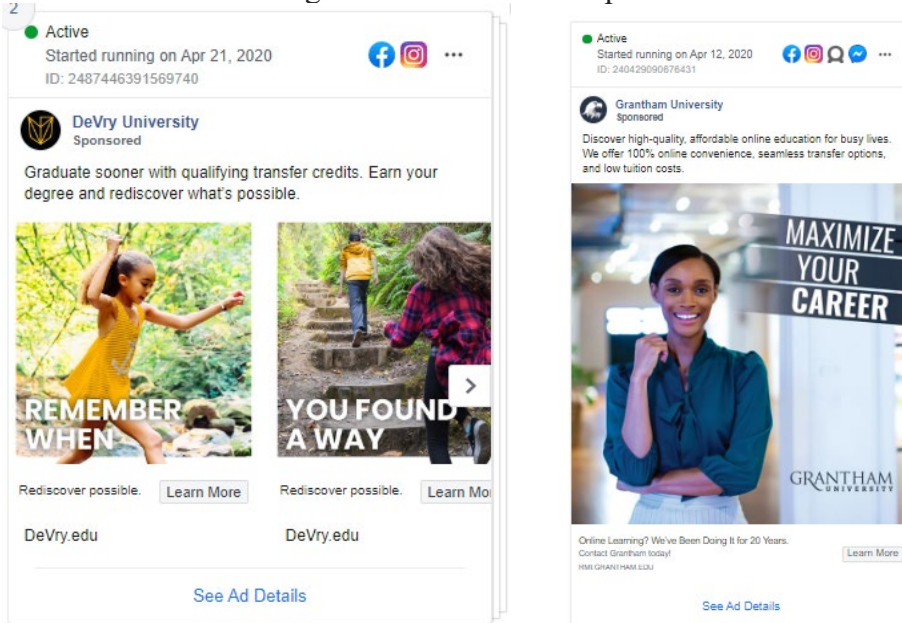
[images above from left to right: Trident University advertisement claiming that qualified students can receive up to “67% off” degrees, downloaded April 29, 2020, Walden University advertisement discussing scholarships, grants, and financial aid, downloaded April 29, 2020]



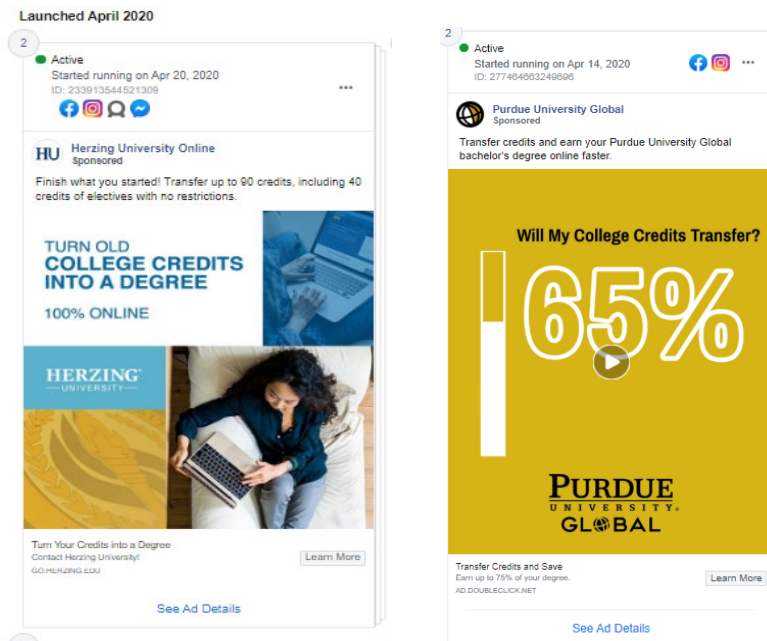
[image above: American Military University advertisement discussing its “Freedom Grant,” downloaded April 10, 2020, Colorado Technical University advertisement discussing its “Patriot Scholarships,” downloaded April 13, 2020]

### Ease of Credit Transfer

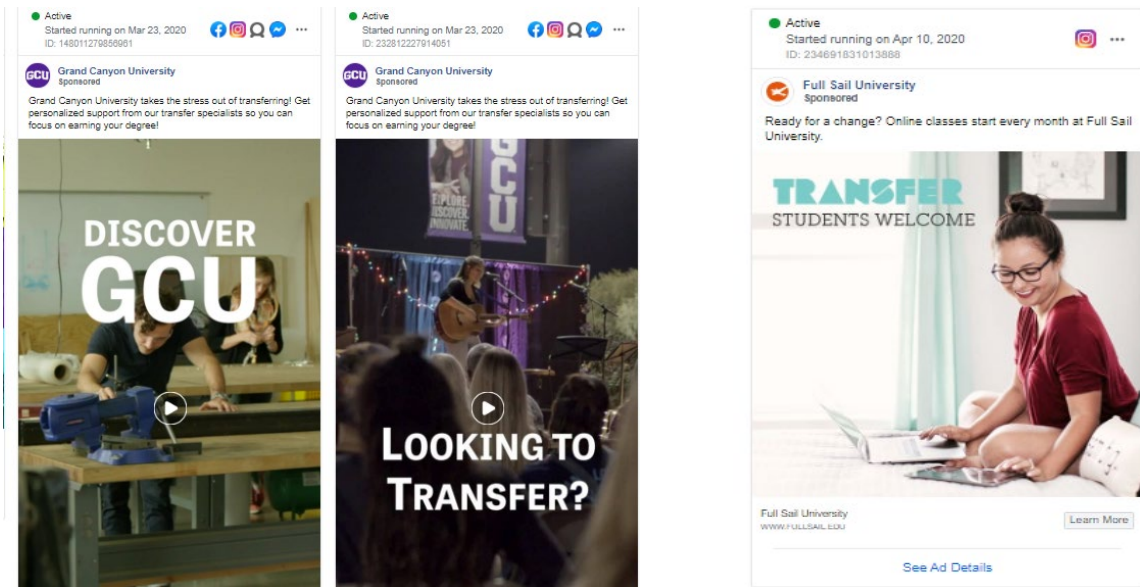
Examples of advertisements featuring credit transfers are depicted below.



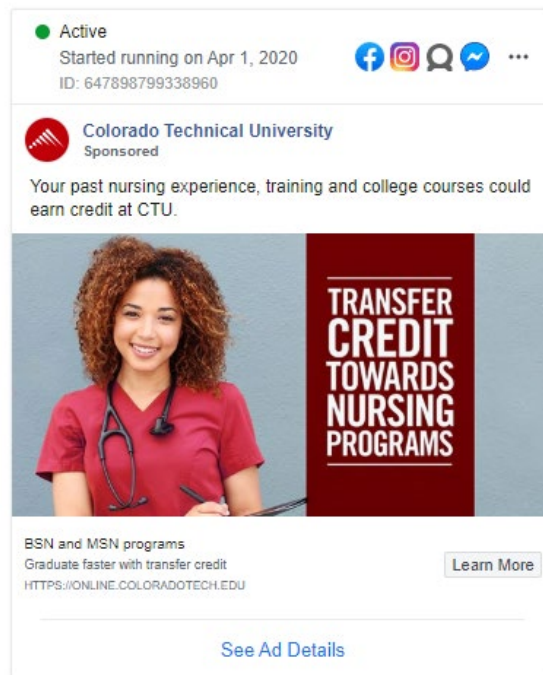
[images above from left to right: DeVry University transfer advertisement, downloaded April 21, 2020, Grantham University transfer advertisement, downloaded April 22, 2020]



[images above from left to right: Herzing University transfer advertisement, downloaded April 22, 2020, Purdue University Global transfer advertisement, downloaded April 27, 2020]



[images above from left to right: Grand Canyon University transfer advertisements, downloaded April 10, 2020, Full Sail University transfer advertisement, downloaded April 10, 2020]



[image above: Colorado Technical University transfer advertisement, downloaded April 13, 2020]

## Targeting Servicemembers

Examples of advertisements targeting servicemembers and veterans are depicted below.

The image displays six American Military University (AMU) advertisements targeting servicemembers and veterans, arranged in two rows of three. Each advertisement features a video player, text describing AMU's programs and grants, and a "See Ad Details" button.

**Top Row:**

- Ad 1 (Left):** "Freedom Grant for Active Duty Military". Text: "If you serve in the U.S. Armed Forces, you have the freedom to pursue your undergraduate and master's education at American Military University for ZERO out-of-pocket tuition." Video shows graduates in caps and gowns.
- Ad 2 (Middle):** "Classes Start Soon!". Text: "AMU offers 200+ online degrees and certificates - both undergraduate and graduate programs. Learn more!" Video shows a person in a dark setting.
- Ad 3 (Right):** "Veteran-Friendly Online University". Text: "AMU understands the unique challenges veterans face when choosing their academic institution and we have a staff dedicated to supporting you. Join thousands of other veteran and active-duty servicemembers who have chosen American Military University. Learn more today!" Video shows silhouettes of people in a field.

**Bottom Row:**

Launched February 2020

- Ad 4 (Left):** "Learn from the Leader in Online Education". Text: "200+ online degrees and certificate programs that start monthly. Affordable tuition with grants for military students." Video shows a man pointing at a screen.
- Ad 5 (Middle):** "Learn from the Leader in Online Education". Text: "200+ online degrees and certificate programs that start monthly. Affordable tuition with grants for military students." Video shows a person in military uniform working on a computer.
- Ad 6 (Right):** "Learn from the Leader in Online Education". Text: "200+ online degrees and certificate programs that start monthly. Affordable tuition with grants for military students." Video shows people in a workshop or classroom.


[images above: American Military University ads targeting servicemembers, downloaded April 10, 2020]

● Active  
 Started running on Apr 1, 2020  
 ID: 225809161808775

This ad has multiple versions. ⓘ

 American InterContinental University  
 Sponsored

Transfer your MOS skills into college credit in one of our industry-relevant programs.




College Credit for MOS  
 Classes start May 8th!  
 COLLEGE CREDIT FOR MOS


[Learn More](#)

[See Ad Details](#)

● Active  
 Started running on Apr 1, 2020  
 ID: 226985291990824

 American InterContinental University  
 Sponsored

Leverage your MOS to earn your degree. Discover your service training college equivalent.



Your MOS can translate


Learn more

[HTTPS://WWW.AIUONLINE.EDU](https://www.aiuonline.edu)


[Learn More](#)

[See Ad Details](#)

● Active  
 Started running on Apr 1, 2020  
 ID: 1077574412615874

 American InterContinental University  
 Sponsored

Make fieldwork count towards your degree. Discover what boxes you've already checked with your MOS.



Check eligibility

Learn more


[HTTPS://WWW.AIUONLINE.EDU/](https://www.aiuonline.edu/)

[Learn More](#)

[See Ad Details](#)

[images above: American InterContinental University ads targeting servicemembers, downloaded April 13, 2020. “MOS” is a military acronym for Military Occupational Specialty, which is used by some of the military services]

● Active  
 Started running on Mar 30, 2020  
 ID: 318496395785035

 Colorado Technical University  
 Sponsored


Enroll in a degree program that honors your eligible [military](#) experience.




Ranked Among the Best by Military Times  
 Join Us  
[HTTPS://ONLINE.COLORADOTECH.EDU/](https://online.coloradotech.edu/) [Learn More](#)

[See Ad Details](#)

● Active  
 Started running on Mar 30, 2020  
 ID: 502284077114280

 Colorado Technical University  
 Sponsored


Military Times ranks CTU® among its list of the best colleges for military members to attend.




Ranked for Military Learners  
 Apply Now  
[HTTPS://ONLINE.COLORADOTECH.EDU/](https://online.coloradotech.edu/) [Learn More](#)

[See Ad Details](#)

● Active  
 Started running on Mar 30, 2020  
 ID: 1291192531065433

 Colorado Technical University  
 Sponsored

Discover the difference of a military-centric university. Enroll at CTU®.



Degrees Made for Vets and Servicemembers  
 Learn More  
[HTTPS://ONLINE.COLORADOTECH.EDU/](https://online.coloradotech.edu/) [Learn More](#)

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[images above: Colorado Technical University ads targeting servicemembers, downloaded April 13, 2020]

● Active  
 Started running on Apr 2, 2020  
 ID: 577028816491205



 **Herzing University - Akron**  
 Sponsored

After serving in the military, Yanna Loch earned his technology management degree with Herzing University. "Employers were seeking me," he says.



Herzing University - "It's a Small College, But It Can Do Big Things"  
 "In the future, I might be able to own my own company." Find out what's possible for you with quality training—and personalized...  
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● Active  
 Started running on Apr 8, 2020  
 ID: 178179523177364



 **Purdue University Global**  
 Sponsored

If you can dream it, you can achieve it.  
 Photo credit: Joshua J.







The appearance of U.S. Department of Defense (DoD) visual information does not imply or constitute DoD endorsement.


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[images above from left to right: Herzing University ad targeting servicemembers, downloaded April 22, 2020, Purdue University Global ad targeting servicemembers, downloaded April 27, 2020]




● Active  
 Started running on Apr 21, 2020  
 ID: 233446354393384

 **Trident at AIU**  
 Sponsored

Create opportunities! Earn an accredited degree - up to 67% off for qualified students.



**Give yourself an edge**  
 Honoring those who currently serve, this scholarship will cover the out-of-pocket gap above TA for up to 10 courses in an associates...  
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● Active  
 Started running on Mar 2, 2020  
 ID: 140439133888332

 **Trident at AIU**  
 Sponsored

us Active Duty & Veterans: Earn your degree 100% online from a regionally accredited university. Military Education Grants available. Time to turn your education dreams into reality.



Active Duty & Veterans  
 Join 22,000+ military alumni

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[images above: Trident University ads targeting servicemembers, downloaded April 29, 2020]

2

Active  
Started running on Mar 2, 2020  
ID: 641500978421378

Trident at AIU  
Sponsored

You served your country, now let us serve you with scholarships available to new students at all degree levels. Make 2020 the year you turn your education dreams into reality. Limited time only. Apply today!



Active Duty & Veterans  
Accredited 100% online university

Learn More

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3

Active  
Started running on Mar 2, 2020  
ID: 623020921589119

Trident at AIU  
Sponsored

Maximize your tuition assistance benefits. Time is running out for the Military Success scholarship.



Military Success Scholarship  
Scholarship deadlines are approaching.  
GO.TRIDENT.EDU

Learn More

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Active  
Started running on Mar 2, 2020  
ID: 132485718155357

Trident at AIU  
Sponsored

Take it from a recent grad; you can succeed at Trident. It all starts in your first session.




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2

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Started running on Apr 2, 2020  
ID: 851377438875898

Trident at AIU  
Sponsored

Create opportunities! Earn an accredited degree - up to 67% off for qualified students.



Give yourself an edge  
Honoring those who currently serve, this scholarship will cover the out-of-pocket gap above TA for up to 10 courses in an...  
GO.TRIDENT.EDU

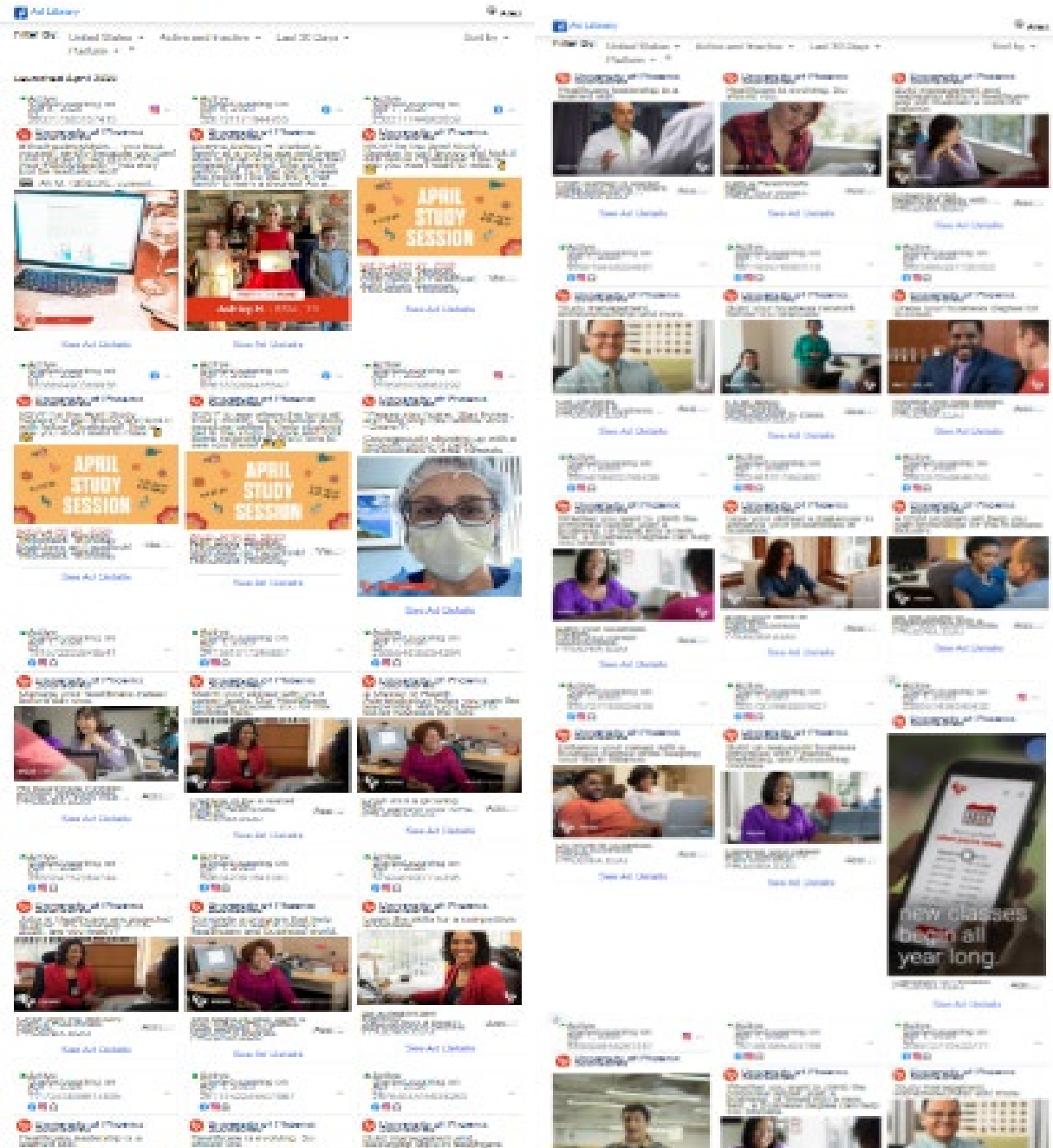
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[images above: Trident University ads targeting servicemembers, downloaded April 29, 2020]

## Large Volume of Ads

Depicted below are examples of the large volume of advertisements by the University of Phoenix, which prompted our analysis.



[images above: screenshots of some of the University of Phoenix advertisements published in April 2020, downloaded April 9, 2020]