1 2 3 4 5 6 7 8 9 10 11	ANTHONY ALEXIS Enforcement Director CARA PETERSEN Deputy Enforcement Director for Litigation NINA H. SCHICHOR, MD Bar (no assequent to the control of the co	signed number) 5449
12 13		ES DISTRICT COURT FRICT OF CALIFORNIA
14		
15	Consumer Financial Protection Bureau,	Case No. <u>'15CV2440 GPC WVG</u>
16	Plaintiff,	COMPLAINT FOR PERMANENT
17	V.	INJUNCTION AND OTHER RELIEF
18		
19	Global Financial Support, Inc., d/b/a Student Financial Resource	
20	Center, d/b/a College Financial	
21	Advisory; and	
22	Armond Aria a/k/a Armond Amir Aria, individually, and as owner and CEO of	
23	Global Financial Support, Inc.;	
24	Defendants.	
25	Detendants.	
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	1	-1-

The Consumer Financial Protection Bureau (the "Bureau") alleges the following against Global Financial Support, Inc. d/b/a Student Financial Resource Center and College Financial Advisory ("Global Financial Support, Inc.") and Armond Aria or Armond Amir Aria ("Armond Aria") (together, "Defendants"):

## **INTRODUCTION**

- 1. The Bureau brings this action under Sections 1031(a), 1036(a)(1)(B), 1054, and 1055 of the Consumer Financial Protection Act of 2010 ("CFPA"); 12 U.S.C. §§ 5531(a), 5536(a)(1)(B), 5564(a), and 5565 based on Defendants' violations of the CFPA in connection with the offering, marketing, sale, and provision of student financial aid advisory services, and under Section 1016 of Regulation P, 12 C.F.R. §1016.4(a), based on Defendants' failure to provide a required notice.
- 2. Defendants, from at least January 2011 until the present ("Relevant Period"), have run a deceptive scheme to persuade consumers to pay a fee to apply for student financial aid assistance. In reality, Defendants do not provide these consumers with the promised student financial aid assistance.

## **JURISDICTION AND VENUE**

- 3. This Court has subject-matter jurisdiction over this action because the action is "brought under Federal consumer financial law," 12 U.S.C. § 5565(a)(1), presents a federal question, 28 U.S.C. § 1331, and is brought by an agency of the United States, 28 U.S.C. § 1345.
- 4. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 12 U.S.C. § 5564(f).

## **PARTIES**

## **Plaintiff**

5. Plaintiff, the Consumer Financial Protection Bureau, is an independent agency of the United States charged with regulating the offering and provision of consumer financial products and services under federal consumer financial laws. 12

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U.S.C. § 5491(a). The Bureau has independent litigating authority, 12 U.S.C. §§ 5564(a) and (b), and is charged with enforcement of federal consumer financial laws including the Consumer Financial Protection Act ("CFPA"). 12 U.S.C. §5511. The CFPA prohibits any covered person from engaging in unfair, deceptive, or abusive acts or practices. 12 U.S.C. §§ 5531 and 5536.

## **Defendants**

## Global Financial Support, Inc.

- Defendant Global Financial Support, Inc. is a California corporation. Global Financial Support, Inc. conducts business as College Financial Advisory and Student Financial Resource Center.
- Defendant Global Financial Support, Inc. claims its physical business 7. address is 3268 Governor Drive, Suite F, PMB 144, San Diego, CA 92122 and consumers applying for financial aid assistance from College Financial Advisory or Student Financial Resource are directed to send their checks to 3268 Governor Drive, Suite #144, San Diego, CA 92122. The address, however, is a PostalAnnex+ store and not a business address.
- Global Financial Support, Inc. is a "covered person" under the CFPA 8. because it offers and provides "financial advisory services," as that term is used in section 1002(15)(A)(viii) of the CFPA. 12 U.S.C. § 5481(15)(A)(viii).
- 9. During the relevant period, Global Financial Support, Inc. transacts or has transacted business in the Southern District of California.

#### **Armond Aria**

- 10. Defendant Armond Aria is the owner and registered agent of Global Financial Support, Inc., the President of College Financial Advisory, and the CEO of Student Financial Resource Center.
- 11. Mr. Aria founded Global Financial Support, Inc. in or around February 2005.

- 12. In March 2005, Mr. Aria created and registered the fictitious business name College Financial Advisory.
- 13. In September 2011, Mr. Aria created and registered the fictitious business name Student Financial Resource Center.
- 14. Mr. Aria is a signatory on the bank accounts for Global Financial Support, Inc. d/b/a Student Financial Resource Center and for Global Financial Support, Inc. d/b/a College Financial Advisory.
- 15. Mr. Aria has primary access to mailbox #144 at the PostalAnnex+ store located at 3268 Governor Drive, San Diego, CA 92122, the address listed for Global Financial Support, Inc.
- 16. Mr. Aria is the point of contact for Global Financial Support, Inc.'s business relationships with the mailing services that print, fold, and stamp letters sent to consumers.
- 17. Mr. Aria is the point of contact for Global Financial Support, Inc.'s business relationships with a phone answering service that accepts calls from consumers on behalf of College Financial Advisory and/or Student Financial Resource Center.
- 18. During the relevant period, acting alone or in concert with others, Mr. Aria has formulated, directed, controlled, or participated in the acts and practices of Global Financial Support, Inc., including the acts and practices set forth in this Complaint.
- 19. Mr. Aria is a "related person" pursuant to the CFPA because he is the director and/or officer of Global Financial Support, Inc., and materially participates in the affairs of Global Financial Support, Inc. 12 U.S.C. § 5481(25) (C).
- 20. Mr. Aria is deemed a "covered person" pursuant to the CFPA because he is a "related person." 12 U.S.C. § 5481(25) (B).
- 21. During the relevant period, Mr. Aria transacts or has transacted business in the Southern District of California.

## BACKGROUND A. Defendants' Business

- 22. During the relevant period, Defendants, under the names College Financial Advisory and Student Financial Resource Center, have run a deceptive scheme to persuade high school seniors, enrolled college students, and their families to pay Defendants a fee to participate in a student financial aid "program." As part of this program, Defendants promise to match students with targeted financial aid opportunities and apply for financial aid for students.
- 23. Through the use of an official-looking seal, artificial filing deadlines, references to students' universities, a "Student Aid Profile Form," and a strategically worded letter, Defendants exploit consumers' unfamiliarity, anxiety, and confusion about the Free Application for Federal Student Aid ("FAFSA") and the student financial aid process generally.

## **B. FAFSA and Student Financial Aid**

- 24. The FAFSA is a universal loan application form provided by the Office of Federal Student Aid at the United States Department of Education. For no charge, students and their families may apply for financial aid by filling out the FAFSA and returning it to the Office of Federal Student Aid.
- 25. Students who are entering college or already enrolled in college are encouraged by their universities to fill out the FAFSA and participate, to the extent possible, in these financial aid programs. Many schools require students to fill out a FAFSA to apply for the schools' own financial aid programs.
- 26. Students and their families eagerly anticipate the opportunity to apply for student aid through the FAFSA, but are often uninformed, anxious, and confused about the financial aid application process.

## C. <u>Defendants' Letters</u>

- 27. During the relevant period, Defendants have sent letters from College Financial Advisory and/or Student Financial Resource Center to graduating high school seniors, enrolled college students, and their families, offering a "program" through which Defendants will target, individually match, and apply for student financial aid on behalf of students and their families.
- 28. Defendants identify these consumers by purchasing lists of student information from online vendors. These vendors sell information, such as a student's name, mailing address, year in school, and school name.
- 29. Defendants have sent millions of letters to consumers nationwide since January 2011.
- 30. Defendants' letters and accompanying envelopes feature a seal and watermark that employ iconic images found predominantly on seals and watermarks used by government agencies. College Financial Advisory's round seal and watermark include a torch, flying eagles, a graduation cap, and olive branches. *See* Attachment A. Similarly, Student Financial Resource Center's round seal and watermark include an eagle, a Greek column, a book, and leaves. *See* Attachment B and C.
- 31. At the top of each letter, Defendants prominently display a bold print box that includes a "filing deadline," and a "filing status." The "filing deadline" varies depending on when the Defendants send the letters to consumers. The "filing status" always reads "pending."
- 32. On each letter, in large bold print in a box at the center of the page, Defendants prominently display a 9-digit "student profile" number and the name of the student's university in a manner that gives the impression that this letter is endorsed or sanctioned by the student's university. If the student is a senior in high school, the "College Attending" section typically states, "Open-all colleges."

- 33. The letters then instruct students or their families to fill out and return an application called a "Student Aid Profile Form" along with the "refundable processing fee" to proceed with the student aid "program" and "apply for the maximum merit and need-based financial aid programs." The "Student Aid Profile Form" looks visually similar to the FAFSA and uses similar terms.
  - 34. The fee has varied from \$59 to \$78, depending on the year.
- 35. On the Student Aid Profile Form, Defendants promise to "review" and "assess" borrowers' applications and "strive to provide as many targeted financial aid opportunities as possible to each and every student, regardless of his/her financial status or academic performance."
- 36. The Student Aid Profile Form demands private, personal information from students, including date of birth, ethnicity, and even their parents' employers and addresses, purportedly for use by Defendants to assist them in qualifying students for student financial aid programs. Defendants provide instructions on how to fill out the form, including a specific instruction to sign and date the form.
- 37. Defendants' letters warn that the "College Financial Advisory Processing Center Department must receive all completed Student Aid Profile Forms no later than **[the filing deadline]**" and that "late Student Aid Profile Forms will be accepted for students with special circumstances."
- 38. Sometimes Defendants' solicitations state that late applications will incur a 20% processing fee.
- 39. Defendants state that "the entire processing fee will be returned within ten (10) business days to all students who do not qualify or do not receive financial aid funding."
- 40. Defendants' letters represent that consumers will lose their opportunity to obtain student financial aid unless they submit the Student Aid Profile Form and pay the fee to Defendants by a specified date.

- 41. Based on the representations and promises made in these letters, consumers send in the Student Aid Profile Form and associated fee to enroll in Defendants' program.
- 42. Defendants do not provide a clear and conspicuous notice that accurately reflects its privacy policies and practices to consumers.

## D. The Website, Phone Number, and Business Expenses

- 43. Along with the letters, Defendants' scheme utilizes two websites <a href="https://www.collegefinadv.org">www.collegefinadv.org</a> and <a href="https://www.studentctr.org">www.studentctr.org</a> with .ORG as its generic top-level domain.
- 44. .ORG domains are commonly known to indicate that the organization associated with the web address is a non-profit, NGO, charitable organization, or interest group and not a for-profit organization.
- 45. The main pages of these two websites display virtually no content, but prompt consumers to input a "Student Profile Number" in order to enter the site and view content. Without entering a Student Profile Number, consumers cannot access the information on the website. This number is on the letters mailed to students and their families.
- 46. Defendants' website urges students and their families to enroll in the student aid program, promising that Student Financial Resource Center "saves students valuable time by conducting precise general research to match student's qualifications and background to available free merit and need-based financial aid programs."
- 47. Although consumers are instructed that they must input their individual 9-digit number in order to access the content on the website, there is no individualized content on the website. Some random 9-digit numbers such as 999-999-999 unlock the content hidden behind the main page, displaying the same information that a specific code would yield. The website provides instructions for downloading and filling out the Student Aid Profile Form.

- 48. Defendants do not maintain a business phone number. Defendants claim consumers can use a toll-free phone number to reach the "College Financial Advisory Student Aid Information Center." Consumers' calls to this number, as well as to the phone number provided for the Student Financial Resource Center, are not directed to Defendants. Rather, consumers' calls are directed to a third-party answering service where an unaffiliated person answers the call, disclaims any association with the Defendants, and purportedly forwards any message along to the Defendants.
- 49. Defendants' claim to have a physical business location at 3268 Governor Drive in San Diego, referred to in Defendants' mailers as the "Processing Center Department." However, this address is a mailbox at a PostalAnnex+ store near Defendant Aria's home, which Defendant Aria uses to collect consumer payments.
- 50. Defendants' other purported location, 777 Campus Commons Road in Sacramento, is a virtual office that forwards mail to the P.O. Box at 3268 Governor Drive.

## E. Defendants' Unlawful Practices

- 51. Defendants do not provide the services offered in their letters and on their website.
- 52. Defendants' "program" is not a program at all. Defendants do not "process" or "assess" student applications and they do not "target" and "apply" for student financial aid on behalf of consumers.
  - 53. Defendants do not "conduct [] extensive searches."
- 54. Defendants do not "match each student's qualifications and background" to student financial aid opportunities.
- 55. Defendants do not "provide as many targeted financial aid opportunities as possible to each and every student."

- 56. Defendants do not "apply for the maximum merit and need-based financial aid programs" for students.
- 57. Defendants do not fulfill their promise that "the entire processing fee will be returned within ten (10) business days to all students who do not qualify or do not receive financial aid funding."
- 58. Many consumers receive absolutely nothing in exchange for sending in their Student Aid Profile Form and fee.
- 59. Defendants promise consumers financial aid advice that is individualized or targeted, but actually send nothing or merely a generic booklet that is not tailored to the consumers' circumstances.
- 60. Defendants' "program" deadline does not correspond to any real deadline associated with any particular financial aid opportunity. The "filing deadline" prominently displayed on Defendants' letters is an arbitrary date that serves only to give the letters an artificial sense of urgency.
- 61. The overall appearance and wording of the envelope, letter, and form the Defendants send to consumers give consumers the net impression that Defendants are affiliated with the federal government, including the United States Department of Education, or a college or university.
- 62. Defendants have obtained at least \$4.7 million in fees from at least 76,000 consumers during the Relevant Period.

## APPLICABLE LAW

- 63. The Bureau is charged with enforcement of federal consumer financial laws, including the Consumer Financial Protection Act ("CFPA").
- 64. Section 1036(a)(1)(B) of the CFPA prohibits covered persons from committing deceptive acts or practices. 12 U.S.C. §5536(a)(1)(B).

- 65. Regulation P is a federal consumer financial law pursuant to 12 U.S.C. §§ 5481(14).
- 66. Regulation P requires "a covered person" to provide consumers with whom the covered person has "customer relationships" with a clear and conspicuous initial privacy notice upon commencement of a customer relationship. 12 C.F.R. §1016.4(a).
- 67. Regulation P defines a "customer relationship" as a "continuing relationship" between a consumer and company that provides one or more "financial products or services" to the consumer that are to be used primarily for personal, family, or household purposes. 12 C.F.R. 1016.3(j)(1).
- 68. Section 1016.3(j) of Regulation P defines a "continuing relationship" as one in which the consumer "obtains financial, investment, or economic advisory services . . . for a fee." 12 C.F.R. §1016.3(j)(3)(i)(G).

## **VIOLATIONS OF THE CFPA**

# COUNTS I – IV: DEFENDANTS USED DECEPTIVE STATEMENTS TO INDUCE CONSUMERS INTO PAYING A FEE FOR FINANCIAL SERVICES IT DID NOT PROVIDE IN VIOLATION OF THE CONSUMER FINANCIAL PROTECTION ACT.

- 69. Plaintiff re-alleges Paragraphs 1-85 and incorporates them herein by reference.
- 70. In numerous instances, in connection with the offering, marketing, sale, or provision of financial advisory services, Defendants represent, directly or indirectly, expressly or by implication:
  - 71. <u>Count One</u>: That in exchange for sending Defendants an application and paying Defendants a fee, consumers are applying for student financial aid or Defendants will apply to student financial aid programs on consumers' behalf;

- 72. In truth and in fact, by sending Defendants an application and paying Defendants a fee, consumers are not applying for student financial aid and Defendants do not apply for student financial aid programs on consumers' behalf.
- 73. <u>Count Two</u>: That Defendants will conduct extensive searches to target or match consumers with particular student financial aid opportunities;
- 74. In truth and in fact, Defendants do not conduct extensive searches to target or match consumers with particular student financial aid opportunities.
- 75. <u>Count Three:</u> That unless consumers send Defendants an application and pay Defendants a fee by a specified deadline, consumers will lose their opportunity to receive student financial aid;
- 76. In truth and in fact, if consumers do not send Defendants an application and pay Defendants a fee by the specified deadline, they will not lose their opportunity to receive student financial aid because the deadline Defendants provide does not correspond to any real deadline associated with any particular financial aid opportunity.
- 77. <u>Count Four</u>: That Defendants are affiliated with the federal government, including the United States Department of Education, or a college or university;
- 78. In truth and in fact, Defendants are not, and never have been, affiliated with federal government, including the United States Department of Education, or a college or university.
- 79. Defendants' acts or practices in Counts One through Four are likely to mislead consumers acting reasonably under the circumstances.

80. Defendants' representations as set forth in the Counts One through Four constitute deceptive acts or practices in violation of Sections 1031(a) and 1036(a)(1)(B) of the CFPA, 12 U.S.C §§ 5531(a) and 5536(a)(1)(B).

## COUNT FIVE: DEFENDANTS FAILED TO PROVIDE A REQUIRED NOTICE IN VIOLATION OF REGULATION P

- 81. Plaintiff re-alleges Paragraphs 1-85 and incorporates them herein by reference.
- 82. Defendants are covered persons subject to the jurisdiction of the Bureau. 12 U.S.C. §§5481(6)(A) & (15)(A)(viii).
- 83. Defendants establish customer relationships because they establish a continuing relationship between a consumer and company and provide financial products or services to consumers primarily used for personal, family or household purposes. 12 C.F.R. §1016.3(j)(1).
- 84. Defendants establish a continuing relationship with consumers when they accept a fee for "financial, investment, or economic advisory services." 12 C.F.R. \$1016.4(c)(3)(i)(C).
- 85. In numerous instances, in connection with the offering, marketing, sale, or provision of financial advisory services, Defendants failed to provide customers with a clear and conspicuous initial privacy notice upon commencement of a customer relationship required by Regulation P, 12 C.F.R. §1016.4(a).
- 86. A violation of Regulation P violates Section 1036 of the CFPA because Section 1036 of the CFPA renders unlawful any act or omission in violation of a Federal consumer financial law, 12 U.S.C § 5536(a)(1), and Regulation P is a Federal consumer financial law. 12 U.S.C. §5481(14).
- 87. Therefore, Defendants' acts or practices described in Count Five violate the CFPA.

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## **CONSUMER INJURY**

88. Consumers have suffered and will continue to suffer substantial injury as a result of Defendants' violations of the CFPA and Regulation P. In addition, Defendants have been unjustly enriched as a result of their unlawful acts or practices. Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public.

## THIS COURT'S POWER TO GRANT RELIEF

89. The CFPA empowers this Court to grant appropriate legal or equitable relief with respect to violations of Federal consumer financial law, including, without limitation, permanent or temporary injunction, rescission or reformation of contracts, the refund of moneys paid, restitution, disgorgement or compensation for unjust enrichment, and civil money penalties. 12 U.S.C. § 5565(a)(2).

## **PRAYER FOR RELIEF**

- 90. Wherefore, the Bureau requests that the Court:
  - a. Permanently enjoin Defendants from committing future violations of the CFPA, 12 U.S.C. §§5531, 5536, and Regulation P, 12 C.F.R. §1016.4(a);
  - b. Award Plaintiff such injunctive and ancillary relief as may be necessary to enjoin Defendants from harming consumers through the advertisement, marketing, promotion, offering for sale or selling of any consumer financial product or service, including, but not limited to, any student financial aid assistance program;
  - c. Award such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the CFPA and Regulation P, including, but not limited to, rescission or reformation of contracts, the refund of moneys paid, restitution, disgorgement or

1	compensation for unjust enrichment, and payment of damages or other
2	monetary relief;
3	e. Award Plaintiff civil money penalties; and
4	f. Award Plaintiff the costs of bringing this action, as well as such other
5	and additional relief the Court determines to be just and proper.
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7	Dated: October 29, 2015
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9	Respectfully submitted,
10	ANTHONY ALEXIS
11	Enforcement Director
12	CARA PETERSEN
13	Deputy Enforcement Director
14	for Litigation
15	_/s/ Nina Schichor
16	
17	NINA H. SCHICHOR, MD Barred
18	(Maryland does not use Bar Numbers) (E-mail: nina.schichor@cfpb.gov)
19	(Phone: 202-435-9770)
20	LAURA SCHNEIDER, NY Bar # 2715449 (E-mail: laura.schneider@cfpb.gov)
21	(Phone: 202-435-7311) 1700 G Street NW
22	Washington, DC 20552
23	Fax: (202) 435-7722
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Filing Deadline: April 30, 2011

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STUDENT PROFILE NUMBER1:	132-014981	
COLLEGE ATTENDING2:	NORTHERN MICHIGAN UNIVERSITY	
FILING STATUS3:	PENDING	

It is time to apply for all available 2011-2012 financial aid programs to help pay for your college education expenses. Students who did not qualify for federal student aid (Pell Grants, FSEOG, or Work-Study) or need additional financial aid assistance should submit applications to other existing financial aid programs.

Students can receive federal, state, local, national merit, and need-based financial aid assistance regardless of their academic performance or family's income level. These funds are not student loans, and they do not have to be repaid. The money can be used to pay for tuition, room and board, fees, books, computers, and transportation.

Submit the enclosed Student Aid Profile Form (SAPF) to pLFroceed with the 2011-2012 College Financial Advisory (CFA) student aid program and apply for the maximum merit and need-based financial aid programs.

The College Financial Advisory Processing Center Department (CFA-PCD) must receive all completed Student Aid Profile Forms no later than <u>April 30, 2011</u>. Fill out the form, enclose the refundable processing fee, and mail both in the pre-addressed envelope. The entire processing fee will be returned within ten (10) business days to all students who do not qualify or do not receive financial aid funding.

Parents can also complete and sign the enclosed form with accurate student information. Late Student Aid Profile Forms will be accepted for students with special circumstances; however, not all financial aid funds will be available. Prepare to apply early because most financial aid programs have strict deadlines and limited funding.

For more information, contact the College Financial Advisory Student Aid Information Center (CFA-SAIC) at 1-888-4-APLY-NOW (1-888-427-5966). You can also visit our website at **www.collegefinadv.org** or email us at **info@collegefinadv.org** with any questions.

Sincerely,

Cirdy Colasil

Cindy Warwick
College Financial Advisory Director
2011-2012 Academic Year Financial Aid Programs
CW/fa

## **COLLEGE FINANCIAL ADVISORY™**



## Student Aid Profile Form 2011 - 2012 School Year

#### **INSTRUCTIONS:**

- 1. Please type or print clearly. Fill out both sides of the student aid profile form.
- 2. Mark an "X" in the box that best describes you for each section.
- 3. Note the CFA processing deadline date.
- 4. Return this form with your refundable CFA processing fee of fifty-nine dollars in the enclosed envelope. Make checks payable to College Financial Advisory. If the return envelope is misplaced, use a regular envelope and mail to: College Financial Advisory, Attention: Processing Center, 3268 Governor Drive, Suite 144, San Diego, California 92122.
- 5. Make sure to sign and date the student aid profile form.

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SECTION I: PERSONAL INFO	PRMATION
1. Last Name 2. First Na	me 3. MI
4. Permanent Mailing Address: Number and Street (Include Apt. Number)	,
5. City	6. State 7. Zip Code
8. Student Profile Number (Located on the CFA 9. Date of Birth (MM/DD/YYYY)	10. Area Code Telephone Number
Letter) or leave blank	(         )         -
11. E-Mail Address or leave blank	
11. Devian radioss of leave stain	
12. What Is Your State Of Legal Residence? 13. Marital Status as of Today?	Single Married 14. Sex: Male Female
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SECTION II: EDUCATIONAL INFO	ORMATION
1. School Currently Attending:	2. Expected Enrollment Status:
	Full Time Part Time Transfer
3. Educational Goals, Highest Degree You Are Considering:	4. Grade Point Average (4.0 = A)
Associate Bachelors Masters Ph. D.	High School College
5. Type of College You Are Attending or Planning To Attend?	6. Majors or Careers You Are Considering:
Two-Year College	1
Four-Year College	2
Trade/Technical School	3
SECTION III: BACKGROUND INFO	DRMATION
SECTION III: BACKGROUND INFO  1. How Do You Describe Your Ethnic/Racial Background?	DRMATION
	DRMATION  Hispanic Native American

Filing Status':	Filing Deadline:
Pending	

OR PARENTS OF

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	to the comment of the	
Student Profile Number:	College	Attending <sup>2</sup> :
230-027664		

It is time for students to apply for the 2014-2015 financial aid programs to help them pay for their college education. Students who did not qualify to receive federal student aid (*Pell Grants, FSEOG, or Work-Study*) or students who need additional financial aid funding should apply to other existing free financial aid programs.

Students can receive federal, non-federal, state, local, national merit, and need-based financial aid assistance regardless of their academic performance or family's income level. Students can use the money they receive to pay for tuition, room and board, fees, books, computers and transportation.

Submit the enclosed Student Aid Profile Form (*SAPF*) to proceed with the 2014-2015 Student Financial Resource Center (*SFRC*) program and apply for the maximum merit and need-based financial aid programs. The funds from these financial aid programs are not student loans and do not have to be repaid later.

The **SFRC** Processing Division (**SFRC-PD**) must receive all completed Student Aid Profile Forms no later than <u>May 31, 2014</u>. Fill out the SFRC form, enclose the refundable processing fee, and mail both in the pre-addressed envelope. The entire processing fee will be returned to all students who do not qualify or do not receive financial aid money.

Parents can also fill out and sign the enclosed SFRC form with accurate student information. Late SFRC forms will be accepted for students with special circumstances; however, not all financial aid funds will be available. Apply early because most financial aid programs have strict deadlines with limited funding. Do not borrow money until you have applied to all of the free federal and non-federal financial aid programs available to you.

For more information, contact the SFRC nationwide message call center at 1-888-730-APPLY (1-888-730-2775). Students can also visit our website at www.studentctr.org or email us at info@studentctr.org with any questions.

#### Student Financial Resource Center

SFRC – Processing Division 2014-2015 Academic Year Financial Aid Programs Enclosure (1) - Student Aid Profile Form (SAPF) CW/fa

The cost of education continues to rise annually, and middle-income families often find themselves caught between "a rock and a hard place." Such families are not wealthy enough to cover all of the costs on their own, but do not have low enough incomes to qualify for need-based aid. Fortunately: there is more diverse financial aid available today; then ever before, to help offset these rising costs. You can receive financial aid even if you are not a straight-A student or a top athlete. In fact, most students and parents are unaware of the vast number of civic, private and state grants, merit scholarships, and fellowships that are available each year. Financial aid is accessible to millions of American families. Yet, too many students are under the impression that they cannot receive financial aid that does not require repayment, so they do not bother applying at all. Remember, financial aid is the key to paying for your college education, and understanding the entire college financial aid process is vital. Do not borrow money to pay for your college education until you have fully exhausted all of the free money opportunities first. Borrowing money should be your last alternative. The more you know about the college preparation and financial aid process, the more financial aid money you will receive. Financial aid typically goes to those who know the most about the financial aid system, so it is important to understand all of your financial aid options when it comes to paying for college.

#### SFRC - CONTACT INFORMATION

Call the SFRC's nationwide toll-free phone number at 1-888-730-2775 between 9:00 A.M. - 4:00 P.M. EST, Monday through Friday. All initial nationwide toll-free phone calls are transferred to a local SFRC's live operator message call center. Provide your contact information, along with the Student Profile Number (SPN) listed on your SFRC Tetter, and an appropriate SFRC representative will call you back promptly. You may also visit our website at www.studentctr.org or email us at info@studentctr.org.

#### INSTRUCTIONS TO FILL OUT THE ENCLOSED STUDENT AID PROFILE FORM (SAPF)

- 1. Print clearly in CAPITAL letters and skip a box between words.
- 2. Mark an "X" in the box that best describes you for each section.
- The refundable SFRC processing fee of sixty-five dollars must be enclosed.
   All Student Aid Profile Forms (SAPF) without payment will automatically be rejected. Make checks payable to: Student Financial Resource Center (SFRC).
- If the return envelope is misplaced, use a regular envelope and mail to: Student Financial Resource Center (SFRC). Attention: Processing Center Division, 3268 Governor Drive Suite 144, San Diego, CA 92122.
- Note the Student Financial Resource Center (SFRC) filing deadline date.

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Make sure to sign and date the Student Aid Profile Form(SAPF).

#### SECTION 1: PERSONAL INFORMATION

- 1. Last Name Write in your last name
- First Name Write in your first name
- 3. MI Write in your middle initial
- Permanent Mailing Address Write in your mailing address
- 5. City Write in your city
- 6. State Write in your state
- 7. Zip Code Write in your zip code
- Student Profile Number Write in your Student Profile Number (located on the SFRC letter) or leave blank
- 9. Date of Birth Write in your birthday in MM/DD/YYYY format
- Area Code & Telephone Number Write in your area code and telephone number
- 11. E-mail Address Write in your e-mail address
- 12. What is Your State of Legal Residence? Write in your state of legal residence
- Marital Status as of Today? Mark your marital status as of today
- 14. Sex Mark your sex (male or female)

#### SECTION III: BACKGROUND INFORMATION

- 1. Ethnic/Racial Background Select the appropriate box
- Clubs Write up to 4 club memberships, organization involvement or leave blank
- Sports Write up to 3 sports in which you have the interest and ability to participate on an intercollegiate level
- Hobbies Write up to 3 hobbies, talents, or special skills
- Military If you served in the military, select the appropriate branch or the N/A box
- Work Experience Write up to 4 volunteer or employment experiences

#### SECTION II: EDUCATIONAL INFORMATION

- School Currently Attending Write in the name of the school you are currently attending. If you are planning to change your school, write in the school name that you will be attending.
- Expected Enrollment Status Select Full-time, Parttime or Transfer
- Educational Goals, Highest Degree You Are Considering

   Select Associate, Bachelors, Masters, Ph.D., or M.D.
- Grade Point Average (4.0 = A) Write in your most recent semester grade point average. You do not have to write in your high school GPA
- Type of College You Are Attending or Planning to Attend? – Select Two-year (community college), Fouryear college (universities), or Trade/Technical School
- Majors or Careers You Are Considering Write up to three majors or careers

#### SECTION IV: PARENTS INFORMATION

- 1. Father's Occupation Write in your father's occupation or mark Unknown
- 2. Name of Employer Write in the name of your father's
- 3. Mother's Occupation Write in your mother's occupation or mark Unknown
- Name of Employer Write in the name of your mother's employer
- 5. Military If your parents served in the military, select the appropriate branch or select the N/A box
- Highest education level your father completed Select Middle school, High school, College, or Unknown
- Highest education level your mother completed Select Middle school, High school, College, or Unknown

#### FOOTNOTES

- <sup>1</sup> This is an internal nine-digit number created and assigned by the Student Financial Resource Center organization (this is not a social security number).
- Student Financial Resource Center has directly sent this letter to students and it is not affiliated with any educational institutions or government agencies.
- <sup>2</sup> Student Financial Resource Center's internal filing status code. The initial and default filing status code is "Pending".

Case 3:15-cv-02440-GPC-WVG Document 1-4 Filed 10/29/15 Page 3 of 4



## STUDENT FINANCIAL RESOURCE CENTER"

## Student Aid Profile Form (SAPF) 2014 - 2015 Academic School Year

## INSTRUCTIONS:

- 1. Print clearly in CAPITAL letters and skip a box between words.
- 2. Mark an "X" in the box that best describes you for each section.
- 3. The refundable SFRC processing fee of sixty-five dollars must be enclosed. All Student Aid Profile Forms without payment will automatically be rejected. Make checks payable to: Student Financial Resource Center (SFRC).
- If the return envelope is misplaced, use a regular envelope and mail to: Student Financial Resource Center (SFRC), Attention: Processing Center Division, 3268 Governor Drive Suite 144, San Diego, CA 92122.
- 5. Note the Student Financial Resource Center (SFRC) filing deadline date.
- 6. Make sure to sign and date the Student Aid Profile Form(SAPF).

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SECTION I: PERSONA	L INFORMATION
1. Last Name	2. First Name 3. MI
4. Permanent Mailing Address: Numband Street (Include Apt. Number)	
5. City	G State 7 7th Calls
	6. State 7. Zip Code
8. Student Profile NumberLocated on the SFRC 9. Date of Birth (MM/DI	D/YYYY) 10. Area Code Telephone Number
Letter) or leave blank	7
11. E-Mail Address or leave blank	
12. What Is Your State Of Legal Residence? 13. Marital Status a	s of Today? Single Married 14. Sex: Male Female
SECTION II: EDUCATION.	AL INFORMATION
1. School Currently Attending:	2. Expected Enrollment Status:
	Full Time Part Time Transfer
3. Educational Goals, Highest Degree You Are Considering:	4. Grade Point Awrage (4.0 = A)
Associate Bachelors Masters Ph.D.	M.D. High School College
5. Type of College You Are Attending or Planning To Attend?	6. Majors or Careers You Are Considering:
Two-Year College	1,
Four-Year College	2
Trade/Technical School	3
SECTION III: BACKGROUN	D INFORMATION
1. How Do You Describe Your Ethnic/Racial Background?	
African American Asian, Vietnamese or Indochi	<u> </u>
Pacific Islander White, Caucasian	Other (Specify)

## Case 3:15-cv-02440-GPC-WVG Document 1-4 Filed 10/29/15 Page 4 of 4

SECTION III:	BACI	KGROUND	INFORMAT	ION (continue	d)		
2. CLUBS: List club memberships or involven	nent in any organiza	tion or affiliatio	ns. Include school	civic, community	service, fratern	al and religious	organizations.
SPORTS: List sport(s) in which you have the on an intercollegiate level.	ne interest and ability	to participate	4. HOBBIES:	List your hobbies, t	alents, or speci	al skills.	
5. If you have served in the military, check the	appropriate branch;	Air F	orce Army	Coast Guard	Marin	es Navy	/
6. WORK EXPERIENCE: List volunteer or of	employment experier	nce.					
SECTION IV:		_	INFORMAT				
1. Father's Occupation:	[	Unknown	2. Name of Emp	oloyer:			Unknown
3. Mother's Occupation:		Unknown	4. Name of Emp	bloyer:			Unknown
5. If your parents served in the military, check	the appropriate bran	ich: Air Fo	rce Army	Coast Guard	Marines	Navy	Unknown
6. Highest Education Level Your Father Comp  Middle School High School	leted:  College	Unknown	7. Highest Educ	ntion Level Your M School	Iother Complet th School	ed: College	Unknown
SECTION V:	REFUND	ABLE SFI	C PROCESS.	ING FEE \$6:	5	Late or i	missing fee - \$78
The refundable SFRC processing fee of sixty-f a 20% service charge will be appended to the p	ive dollars must be e	nclosed, All St	udent Aid Profile I	forms (SAPF) with	out payment w		
Personal Check	-		er Check		. —	Money Order	
SECTION VI: CERTIFICATION	ON OF THE ST	TIDENT E	NANCIAL RE	SOURCE CEN	VTED /SED	C) PROCR	484
I certify that all of the information on this f opportunities as possible to each and every stu- not have to be repaid, however, SFRC is unal funds and it is not affiliated with any educatio funding each year and in the event that fundin full refund of the SFRC processing fee will be	form is true and condent, regardless of hole to guarantee resunal institutions, govern g is not received, the	mplete to the bis/her financial alts and has no ernment agencie applicant car	est of my knowle status or academi input into the dec es or funding sour	dge. SFRC will st e performance. The ision to which app ces. Most foundation	rive to provide se financial aid licants will be ons and organi	e as many targ I funds are not selected to rec zations have a	eted financial aid loans and they do eive financial aid limited amount of
v				-			
X Preparer's Sig	nature [ Student	or Parent ]		MONTH	[ D/	AY LL	YEAR L
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Filing Status':	Filing Deadline:
Pending	April 30, 2015

JASMINE SANJURJO, OR PARENTS OF

Student Profile Number!:	College Attending:
884-034029	OPEN - ALL COLLEGES

It is time for students to apply for the 2015-2016 financial aid programs to help them pay for their college education. Students who did not qualify to receive federal student aid (*Pell Grants, FSEOG, or Work-Study*) or students who need additional financial aid funding should apply to other existing free financial aid programs.

Students can receive federal, non-federal, state, local, national merit, and need-based financial aid assistance regardless of their academic performance or family's income level. Students can use the money they receive to pay for tuition, room and board, fees, books, computers and transportation.

Submit the enclosed Student Aid Profile Form (SAPF) to proceed with the 2015-2016 Student Financial Resource Center (SFRC) program and apply for the maximum merit and need-based financial aid programs. The funds from these financial aid programs are not student loans and do not have to be repaid later.

The SFRC Processing Division (SFRC-PD) must receive all completed Student Aid Profile Forms no later than April 30, 2015. Fill out the SFRC form, enclose the refundable processing fee, and mail both in the pre-addressed envelope. The entire processing fee will be returned to all students who do not qualify or do not receive financial aid money.

Parents can also fill out and sign the enclosed SFRC form with accurate student information. Late SFRC forms will be accepted for students with special circumstances; however, not all financial aid funds will be available. Apply early because most financial aid programs have strict deadlines with limited funding. Do not borrow money until you have applied to all of the free federal and non-federal financial aid programs available to you.

For more information, contact the SFRC nationwide message call center at 1-888-730-APPLY (1-888-730-2775). Students can also visit our website at www.studentctr.org or email us at info@studentctr.org with any questions.

#### Student Financial Resource Center

SFRC – Processing Division 2015-2016 Academic Year Financial Aid Programs Enclosure (1) - Student Aid Profile Form (SAPF) cw/fa

#### STUDENT FINANCIAL RESOURCE CENTER"

The Student Financial Resource Center (SFRC) is an independent organization devoted to helping students apply for and receive the best available free merit and need-based financial aid. SFRC conducts extensive searches to match student's qualifications and background to key federal, state, local, and private financial aid programs that are both merit and need-based. SFRC provides students with a comprehensive SFRC financial aid guidebook that explains all of the basics of financial aid and offers valuable tips, practical strategies, and clear guidelines for applying to SFRC's specifically selected free merit and need-based financial aid programs. Studies have shown that a large number of students do not apply for all of the free merit and need-based financial aid programs available to them. SFRC can increase students' chances of obtaining free merit and need-based financial aid programs. You can take advantage of our specialized timesaving services or you can simply invest your own time to find and apply to the numerous free financial aid programs that are readily available to you. Do NOT berrow money to pay for your college education until you have fully exhausted all of the free money opportunities that are out there. Good luck, and best wishes for your successful educational future!

#### SFRC - CONTACT INFORMATION

Call the SFRC's nationwide toll-free phone number at 1-888-730-2775 between 9:00 A.M. - 4:00 P.M. EST, Monday through Friday, All initial nationwide toll-free phone calls are transferred to a local SFRC's live operator message call center. Provide your contact information, slong with the Student Profile Number (SPN) listed on your SFRC letter, and an appropriate SFRC representative will call you back promptly. You may also visit our website at www.studentetr.org or email as at info@studentetr.org.

#### SFRC PACKAGE DELIVERY INFORMATION

Once your refundable processing fee is endorsed, the SFRC Processing Division will require approximately four to six (4-6) weeks to process your certified.

Student Aid Profile Form (SAPF). For more information, please visit the SFRC website (http://www.studentetr.org), under the "Target Delivery Dates" link, to determine your package's target delivery date.

#### INSTRUCTIONS TO FILL OUT THE ENCLOSED STUDENT AID PROFILE FORM (SAPF)

- 1. Print clearly in CAPITAL letters and skip a box between words.
- 2. Mark an "X" in the box that best describes you for each section.
- The refundable SFRC processing fee of sixty-five dollars must be enclosed. All Student Aid Profile Forms (SAPF) without payment will automatically be rejected. Make checks payable to: Student Financial Resource Center (SFRC).
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SECTION III: BACKGROUND INFORMATION

igvolvement or leave blank

experiences

Ethnic/Racial Background - Select the appropriate box Clubs - Write up to 4 club memberships, organization

Sports - Write up to 3 sports in which you have the interest and ability to participate on an intercollegiate

Work Experience - Write up to 4 volunteer or employment

#### SECTION I: PERSONAL INFORMATION

- 1. Last Name Write in your last name
- 2. First Name Write in your first name
- 3. M1 Write in your middle initia)
- 4. Permanent Malling Address Write in your mailing address
- 5. City Write in your city
- 6. State Write in your state
- 7. Zip Code Write in your zip code
- Student Profile Number Write in your Student Profile Number (located on the SFRC letter) or leave blank
- 9. Date of Birth Write in your birthday in MM/DD/YYYY format
- 10. Area Code & Phone # Write in your area code and phone #
- 11. E-mail Address Write in your c-mail address
- What is Your State of Legal Residence? Write is your state of legal residence
- 13. Marital Status as of Today? Mark your marital status as of today
- 14. Sex Mark your sex (male or female)

## SECTION IV: PARENTS INFORMATION

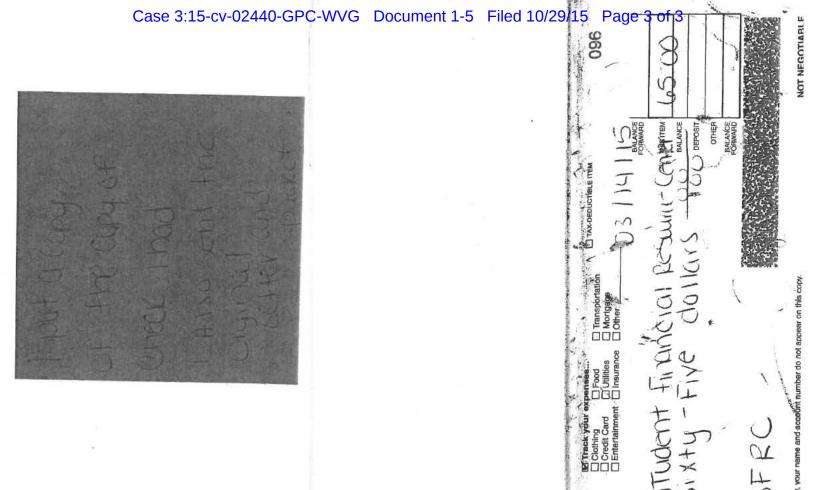
- Father's Occupation Write in your father's occupation or mark Unknown
- Name of Employer Write in the same of your father's employer
- Mother's Occupation Write in your mother's occupation or mark Unknown
- Name of Employer Write in the name of your mother's comployer
- Military If your parents served in the military, select the appropriate branch or select the N/A box

#### SECTION II: EDUCATIONAL INFORMATION

- School Currently Attending Write in the name of the school you are currently attending. If you are planning to change your school, write in the school name that you will be attending.
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- Grade Point Average (4.0 = A) Write in your recent semester made point average. You do not have to write in your high school GPA.
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## STUDENT FINANCIAL RESOURCE CENTER

SFRC - 2015-2016 Financial Aid Programs 777 Campus Commons Rd., #200, Sacramento, CA 95825 www.studentctr.org • info@studentctr.org • 888-730-2775

Student Financial Aid Profile Form Enclosed

