

Exhibit 20

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et al*

Plaintiffs,

v.

MIGUEL CARDONA, in her official capacity as Secretary of the United States Department of Education, and the UNITED STATES DEPARTMENT OF EDUCATION

Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF MALISSA AARONSON

I, Malissa Aaronson, state as follows:

1. I am submitting this declaration in relation to the above-captioned case.
2. I live in Seminole, Florida.
3. I am 48 years old.
4. I live with my husband and our eight-year old daughter. In addition to helping

support my family, I help financially support my elderly father.

5. I borrowed federal student loans in order to attend American Intercontinental University for an associate degree in business administration. The school misled me about the cost of the education and what attendance at the school would do to advance my career, Had I known about all of the lies they told me, I would have never attended the school. I now work as a part-time reading teacher in public schools. I realized how much I loved working in elementary school education and inquired about teaching. Of course, I would need a bachelor's degree in education to teach, but the entire experience with American Intercontinental has put me off pursuing an additional degree. I don't want to incur more crippling debt in the pursuit of a bachelor's degree to teach.

1
2 6. I submitted a borrower defense application in 2016 relating to my attendance
3 American Intercontinental University.

4 7. I received a notice from the Department of Education telling me that I am a
5 Automatic Discharge Group class member in the above-captioned case.

6 8. My loan servicer is MOHELA.

7 9. As of the date of this declaration, the federal loans I took out to attend American
8 Intercontinental University still appear on my credit report.

9 10. My online account with MOHELA lists a negative balance of \$3,066.51. I believe
10 I am owed this amount but I haven't received any refund.

11 11. My family and I are counting on this refund to help with our household expenses.
12 My daughter will need braces soon, which is a huge financial expense for us. In addition, we
13 help financially support my elderly father, and we could use some of the refund to help pay for
14 his expenses.

15 12. I was defrauded by the school, and lured with false promises. Its been eight years,
16 and I just want to know that this experience is behind me.

17
18 I swear under penalty of perjury that the foregoing is true and correct.

19
20 Executed on: 18/03/2024

21 PINELLAS COUNTY, FLORIDA

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23 
Malissa Aaronson (Mar 18, 2024 18:18 EDT)

24 MALISSA AARONSON

Exhibit 21

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et al*

Case No.: 19-cv-03674-WHA

Plaintiffs,

v.

MIGUEL CARDONA, in her official capacity as Secretary of the United States Department of Education, and the UNITED STATES DEPARTMENT OF EDUCATION

DECLARATION OF LAURA DADICH

Defendants.

I, Laura Dadich, state as follows:

1. I am submitting this declaration in relation to the above-captioned case.
2. I am a woman in my 40s currently living in Nashville, Tennessee.
3. From 2006 to 2008, I attended Katherine Gibbs College in Melville, New York.

Katherine Gibbs was then purchased by SBI, a division of Sanford Brown. I continued taking classes at SBI from 2010 to 2011.

4. At Katherine Gibbs/SBI, I was studying to become a nurse.

5. In January 2013, I moved to Minnesota and tried to continue my studies. But I found that none of the colleges I applied to would accept my credits from Katherine Gibbs/SBI, even though representatives from those schools had told me that the credits would be transferable.

6. I had to start my education over. I attended North Hennepin Community College, along with various other MNSCU (Minnesota State Colleges and Universities) schools, to try to obtain the prerequisites I needed for nursing school. But eventually I had to quit school to pay

1 down my loans from Katherine Gibbs/SBI because I had maxed out the amount of federal
2 student loans I was allowed to take out for undergraduate programs.

3 7. I was never able to become a nurse. Instead, I have spent many years working as a
4 GI technical specialist (assisting with colonoscopies and endoscopies).

5 8. I borrowed federal student loans in order to attend Katherine Gibbs/SBI and then
6 North Hennepin Community College/MNSCU.

7 9. In 2016, I consolidated my loans from Katherine Gibbs/SBI (which were a mix of
8 Direct and FFEL loans) and North Hennepin Community College/MNSCU into two federal
9 Direct Consolidation Loans. The initial combined balance of these two Consolidation Loans was
10 \$65,635 (\$26,516 in principal from Katherine Gibbs/SBI; \$30,500 in principal from North
11 Hennepin Community College/MNSCU; plus accumulated interest). I have made payments on
12 these loans during various periods over the years.

13 10. I submitted a borrower defense application in September 2015 relating to my
14 loans from Katherine Gibbs/SBI.

15 11. In February 2023, I received a notice from the Department of Education telling
16 me that my loans from Katherine Gibbs/SBI would be discharged because of the settlement in
17 the above-captioned case. I understand this means that I am a member of the “automatic relief
18 group” under the settlement.

19 12. My loan servicer is MOHELA.

20 13. In October 2023, I received a discharge of some, but not all, of my Katherine
21 Gibbs/SBI loans, resulting in a decrease in my Consolidation Loan balances.

22 14. On March 11, 2024—about six weeks after the automatic relief group deadline—
23 my Consolidation Loan balances decreased again, which I believe reflects a discharge of my
24 remaining Katherine Gibbs/SBI loans.

25 15. However, I cannot tell from my student loan account information whether these
26 discharges account for the interest attributable to my Katherine Gibbs/SBI loans, or only the
27 principal.
28

1 16. Additionally, I have not yet received any refund under the settlement in this case.
2 I am owed a refund of amounts I paid on my Direct Consolidation Loans that are attributable to
3 the Katherine Gibbs/SBI loans. I am also owed a refund of any amounts I paid on my Direct
4 Loans from SBI before consolidation.

5 17. I have tried multiple times to get payment history information about my loans
6 from Navient, which was my servicer until 2021 (when my accounts were transferred to
7 MOHELA), so that I can try to calculate the amount of the refund I am owed. But Navient has so
8 far either claimed that the information is not available, or promised to send me the information
9 and then never followed through. My recollection is that I paid about \$9,000 on the
10 Consolidation Loans before the COVID payment pause began.

11 18. The effect of these loans on my life over the years has been enormous. Because of
12 my Katherine Gibbs/SBI loans, I wasn't able to finish my education as a nurse; now, at my age, I
13 feel like it's too late to go back to school. Last year I was finally able to purchase a home, but my
14 debt-to-income ratio meant that I was not able to get a competitive interest rate.

15 19. The delay in receiving my refund under the settlement is causing me ongoing
16 harm. I have put off dental work because of my student loans, which the refund could help pay
17 for. I also have about \$16,000 in private loans from Katherine Gibbs/SBI that are not eligible for
18 the *Sweet* settlement, which continue to hang over my head. I have been making payments on
19 those loans every month, but I can only afford to pay the interest, so the balance never goes
20 down. I would like to use some of my refund money to pay down those loans so that I can finally
21 be closer to ending this nightmare.

22 20. I have paid thousands of dollars over more than a decade toward worthless credits
23 from Katherine Gibbs/SBI. Learning that my federal loans would be forgiven and refunded under
24 this settlement was a great relief, but now the wait to see whether and when my relief will
25 actually arrive is causing me renewed stress. Being able to finally put this matter to rest would
26 help me sleep better at night.

1 I swear under penalty of perjury that the foregoing is true and correct.

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3 Executed on 3/15/2024, 2024, in Maury County, Tennessee (county, state).

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5 _____
6 Laura Dadich

Exhibit 22

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et al*

Plaintiffs,

v.

MIGUEL CARDONA, in her official
capacity as Secretary of the United States
Department of Education, and the UNITED
STATES DEPARTMENT OF EDUCATION

Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF STELLA JOHNSON

I, Stella Johnson, state as follows:

1. I am submitting this declaration in relation to the above-captioned case.
2. I live in Harrisburg, Illinois.
3. I am 51 years old.
4. I am disabled and I live with my son and two grandchildren.
5. I borrowed federal student loans in order to attend Anthem College (formerly

Hightech Institute) to get a Bachelor's degree in criminal justice.

6. I was 32 when I got my high school diploma. At the time, there were advertisements encouraging moms to get their college degree and I was inspired to go. In 2009, I graduated with an associate degree in criminal justice, but the school misled me into believing that a bachelor's degree would be more useful, and so on their bad advice, I got my bachelor's degree in 2011. It added no value. The only job I could get was working as a security guard. I then worked as an administrative assistant, but never worked in the criminal justice field.

7. I submitted a borrower defense application in 2018 relating to my attendance at Anthem College.

1 8. I received a notice from the Department of Education telling me that I am an
2 Automatic Discharge Group class member in the above-captioned case.

3 9. My loan servicer is AidVantage.

4 10. I have almost \$48,000 in outstanding federal student loans related to my
5 attendance at Anthem College. I have approximately \$1,600 in outstanding loans for my short
6 attendance at the University of Phoenix.

7 11. To the best of my recollection, around 2012 or 2013, my tax refund was garnished
8 in the amount of \$1,900 for my Anthem College loans.

9 12. I believe I am owed a refund of \$1,900 from when my tax refund was garnished.

10 13. As of the date of this declaration, despite my having made disputes to two credit
11 reporting agencies, my federal student loans from Anthem College still appear on my credit
12 reports and are listed with a balance due and owing on my Transunion credit report.

13 14. As a result of the loans still appearing on my credit report, I am only able to
14 qualify for very high interest loans.

15 15. My home desperately needs a new roof and a furnace. The refund would help me
16 pay for a new furnace. If the loans were off my credit report, I could get a loan with a reasonable
17 interest rate to help pay for a new roof.

18 16. In January 2024, I needed to have surgery and my insurance did not cover all of it.
19 I was counting on full relief in this case, including having the loans deleted from my credit
20 report, so that I could take out a loan with a reasonable interest rate to pay for my medical
21 expenses.

1 17. I wish I had never attended Anthem College. So many people who attended the
2 school were defrauded just like me. Living in limbo for so many years has been very stressful
3 and I really just want to get my full settlement relief and put all of this behind me.

4
5 I swear under penalty of perjury that the foregoing is true and correct.

6
7 Executed on: 15/03/2024

8 SALINE COUNTY, ILLINOIS

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10 
Stella Johnson (Mar 15, 2024 20:47 CDT)

11 STELLA JOHNSON

Exhibit 23

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et al*

Plaintiffs,

v.

MIGUEL CARDONA, in her official capacity as Secretary of the United States Department of Education, and the UNITED STATES DEPARTMENT OF EDUCATION

Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF CHRISTOPHER MATTHEWS

I, Christopher Matthews, state as follows:

1. I am submitting this declaration in relation to the above-captioned case.
2. I live in Bloomington, Indiana, with my wife and two teenaged daughters.
3. I am 39 years old.
4. I borrowed federal student loans in order to attend ITT Technical Institute's Drafting and Design Technology Associate of Applied Science Degree Program in Indianapolis, Indiana, from 2003 to 2006.

5. Because of the school's misconduct, I did not graduate from ITT.

6. My campus was shut down for over a month in 2004 when the federal government raided the campus for abusive practices.

7. I was not given class credit for multiple class I attended online, and the program lacked enough teachers to keep other classes going. I was told that the only way I could graduate was to enroll in a bachelor's degree program and use those course credits towards my associate's degree. I did not want to take on the additional cost or waste more time at ITT, so instead I dropped out.

1 8. My loans are FFEL(P) loans. My loan servicer is Navient.

2 9. I have \$43,205.00 in outstanding principal and \$10,865.00 in outstanding interest.

3 10. I never took out any other federal student loans. All of my student loans are from
4 ITT.

5 11. I submitted a borrower defense application relating to my ITT loans in 2015.

6 12. I received a notice from the Department of Education on February 28, 2023, telling
7 me that I am a class member in the above-captioned case and my ITT loans would be discharged.
8 I understand this means that I am a member of the “automatic relief group” in this case.

9 13. As of March 15, 2024, Navient is still listing the loans I took out to attend ITT as
10 outstanding. In addition, these loans appear with a balance due on my TransUnion credit report.

11 14. I have had these loans for almost 20 years. Financially, I still feel like a 20-year-
12 old because I can’t get my credit up yet, so I can’t do the things that an adult does. It took my wife
13 and me 10 years to get our credit high enough to finally buy a home. Our family cars have broken
14 down in the last few years, and we haven’t been able to replace them because we don’t have the
15 credit. I’m currently borrowing my mom’s vehicle for work.

16 15. My daughter is a senior in high school. She has a 4.2 GPA. She’ll be the first person
17 in our family with a college degree. I want her to go to school wherever she wants, but I’m worried
18 about how to pay for it. I don’t want what happened to me to happen to her.

19
20 I swear under penalty of perjury that the foregoing is true and correct.

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22 Executed on: 18/03/2024

23 GREENE COUNTY, INDIANA

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25 *Chris Matthews*

26 _____
27 Christopher Matthews

Exhibit 24

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et al*

Plaintiffs,

v.

MIGUEL CARDONA, in her official capacity as Secretary of the United States Department of Education, and the UNITED STATES DEPARTMENT OF EDUCATION

Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF MICHAEL MCDONALD

I, Michael McDonald, state as follows:

1. I am submitting this declaration in relation to the above-captioned case.

2. I live in Oil City, PA, a small town in the northwestern region of Pennsylvania. I have lived in Oil City for most of my life.

3. I am a 39-year-old single father of a 7-year-old child.

4. Shortly after high school, I briefly attended a small business college in my hometown called Dubois Business College. But I soon realized that business was not for me, so I enrolled in the criminal justice program at the nearby University of Pittsburgh-Titusville campus. Before I could finish my program at Titusville, I realized that I needed to work full-time to support myself, so I withdrew. I had seen advertisements for the University of Phoenix, and the flexibility of its online programs seemed perfect for what I needed. I enrolled in a criminal justice program at University of Phoenix in 2011.

5. Unfortunately, once I enrolled, I realized that the advertisements had been false promises. My classes barely taught me anything. Because I wanted to finish my degree, I

1 continued at University of Phoenix until I graduated in 2014. But I have never gotten a job in my
2 field of study.

3 6. I borrowed federal student loans in order to attend University of Phoenix,
4 University of Pittsburgh-Titusville, and Dubois Business College.

5 7. Near the end of my time at University of Phoenix, one of the financial aid
6 representatives convinced me to consolidate my federal student loans. I did not fully understand
7 the process or why it was important, but I went along with it.

8 8. Now I have two federal Direct Consolidation Loans, which each contain a
9 combination of loans from University of Phoenix, University of Pittsburgh-Titusville, and
10 Dubois Business College.

11 9. When I first combined my loans into the two Consolidation Loans, the combined
12 balance was \$69,775 (\$32,242 in principal from the University of Phoenix; \$23,049 in principal
13 from University of Pittsburgh-Titusville; \$6,625 in principal from Dubois Business College; and
14 accumulated interest). Now my total combined Consolidation Loan balance is \$84,888—an
15 increase of over \$15,000, even though I have never been in default.

16 10. I submitted a borrower defense to repayment application on March 19, 2021,
17 relating to my loans from the University of Phoenix.

18 11. I received a notice from the Department of Education on February 28, 2023,
19 telling me that I am a class member in the above-captioned case and my University of Phoenix
20 loans would be discharged. I understand this means that I am a member of the “automatic relief
21 group” in this case.

22 12. My loan servicer is MOHELA.

23 13. I have not yet received any relief under the *Sweet* settlement.

24 14. As of the date of this declaration, MOHELA has not subtracted any of the
25 principal or interest associated with the University of Phoenix loans from my Consolidation
26 Loan balance. There has not been any decrease in my Consolidation Loan balance since I
27 received notice from the Department of Education that the University of Phoenix loans would be
28 discharged.

1 15. I also have not received a refund of any of the money I paid toward the
2 Consolidation Loans that was attributable to the University of Phoenix loans.

3 16. The full balance of my Consolidation Loans is still appearing on my Experian
4 credit report.

5 17. I currently work for the state of Pennsylvania at a mental health facility. I used to
6 work at a facility close to my home, but the state shut it down. In order to keep my job, I had to
7 apply for a transfer to another facility. Now I drive 100 miles round-trip to and from work every
8 day.

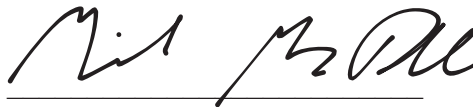
9 18. I am trying to find a home for myself and my child that's closer to where I work,
10 but both the rent and home prices are higher in that area. Because of my student loan debt—more
11 than half of which is from the University of Phoenix—I can't get any kind of loan without a co-
12 signer. I cannot buy a car on my own, much less a house. I've been told no by every mortgage
13 lender in my area; in many cases, they won't even run a full credit check once they see how high
14 my debt-to-income ratio is.

15 19. I was counting on the discharge, refund, and credit repair from the *Sweet* case to
16 allow me to find a suitable place for my family to live. Every day that the relief is delayed is
17 another day when I have to make my 100-mile commute, which takes away from time that I
18 could otherwise spend with my child.

19 20. These loans from the University of Phoenix for a worthless education have been a
20 burden on me for a decade now. When I heard that they would be discharged, I thought the stress
21 would finally be over. But instead, I now have a new source of stress, wondering if or when the
22 government is going to keep its promise.

23 I swear under penalty of perjury that the foregoing is true and correct.

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25 Executed on March 15, 2024, 2024 in Venango County, Pennsylvania (county, state).

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28 Michael McDonald

Exhibit 25

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et al*

Plaintiffs,

v.

MIGUEL CARDONA, in her official
capacity as Secretary of the United States
Department of Education, and the UNITED
STATES DEPARTMENT OF EDUCATION

Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF KATELIN MUNDY

I, Katelin Mundy, state as follows:

1. I am submitting this declaration in relation to the above-captioned case.
2. I live in Midwest City, Oklahoma.
3. I am 32 years old and I live with my husband, four children, and two family

members who we take care of. My husband and I work full-time to support our family, and we still can barely scrap by.

4. I joined the Army National Guard at the young age of 17, only to be discharged two years later due to multiple injuries to my right knee. This was a major blow to myself and my family as I was no longer able to go to school or provide for them through the military like I had originally planned.

5. As a young mother I wanted nothing more than to prove to my children that it didn't matter what obstacles they faced or how "late" they started, but that they could obtain their education if they put their mind to it. After attending a few other schools, I began my journey with DeVry University after being called by a student advisor with the local DeVry University college that was once located in Oklahoma City, Oklahoma. They got me to submit

1 my application to join with hopes of a brighter future, full support of multiple programs, and a
2 promise to have job placement upon graduation with a high success rate. This was what first
3 drew me in because as a mother with children and a husband to support, I needed the degree and
4 I needed to obtain a higher paying job because we weren't even making it paycheck to paycheck
5 with having some support of WIC (state benefit), and I had to make many decisions as to
6 whether or not we ate or purchased things for the kids.

7 6. Once I obtained my bachelor's degree, I was offered a discount on a master's
8 degree program with the promise that DeVry University/Keller Graduate School of Management
9 would hire me as a virtual professor while allowing me to still work full time and finally be
10 financially free. Upon receiving my first master's degree, I was told that I needed to obtain
11 additional credits in the course that I would like to teach to meet the requirements of becoming a
12 professor. Unfortunately, this meant having to incur more student loan debt as I took a couple
13 additional courses and obtained a second master's degree. In June of 2020, I "graduated" and
14 never became a professor despite doing everything I was told I needed to do based on false
15 promises of becoming a professor once I completed the requirement. I applied to over 100 jobs,
16 and got so many rejections. When I started asking why I was receiving so many rejections I was
17 finally told by several individuals and recruiters that the education I received meant nothing
18 because DeVry University/Keller Graduate School of Management wasn't considered to be a
19 "real" education. I, along with thousands of other students, was defrauded by the many lies
20 DeVry told us.

21 7. I borrowed federal student loans in order to attend DeVry University to get my
22 bachelor's degree, as well as two master's degrees.

23 8. I submitted a borrower defense application in 2021 relating to my entire
24 attendance at DeVry University.

25 9. I received a notice from the Department of Education telling me that I am an
26 Automatic Discharge Group class member in the above-captioned case.

27 10. My loan servicer is MOHELA.
28

1 11. I had approximately \$108,000 in outstanding loans related to attending DeVry,
2 and have approximately \$41,000 in outstanding loans related to other schools I have attended.

3 12. As of the date of this declaration, my DeVry loans were discharged at the
4 beginning of this month, but still appear with a balance due and owing on my credit report.

5 13. Last year, I was in the process of purchasing the home that I had been living in
6 with my husband, four children, two other family members, and our dogs. Because my DeVry
7 federal student loans were still on my credit report, in order to not lose our home—and with no
8 relief in sight from the discharge I was approved for—my husband and I had to take out high-
9 interest loans to afford the down payment on our home due to my high debt-to-income ratio.

10 These high-interest loan payments have me under constant stress and praying that no one gets
11 sick or hurt because I couldn't afford it.

12 14. I am praying that my car doesn't face any mechanical issues because I am unable
13 to purchase another car because I cannot afford another high-interest loan.

14 15. As a result of having to take out such high-interest loans, I work two jobs just to
15 be able to afford our bills and loan payments.

16 16. If my DeVry loans were removed from my credit report, it would mean that I
17 could possibly refinance my high-interest loans, saving me thousands of dollars each month. I
18 also wouldn't have to work multiple jobs just to try to make ends meet, meaning I can be more
19 present in my family's lives.

1 17. All I want is a chance of undoing some of the damage and harm that DeVry
2 caused to my family and me and to get the relief that I am entitled to get. I am exhausted from
3 worrying and stressing about finances. I am exhausted from the dark thoughts that come and go
4 while remembering I have a family I am fighting to provide for.

5
6 I swear under penalty of perjury that the foregoing is true and correct.

7
8 Executed on: 15/03/2024

9 OKLAHOMA COUNTY, OKLAHOMA

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11 
Katelin Mundy (Mar 15, 2024 19:42 CDT)

12 KATELIN MUNDY

Exhibit 26

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et al*

Plaintiffs,

v.

MIGUEL CARDONA, in her official capacity as Secretary of the United States Department of Education, and the UNITED STATES DEPARTMENT OF EDUCATION

Defendants.

Case No.: 19-cv-03674-WHA

DECLARATION OF MEGHAN RATTE

I, Meghan Ratte, state as follows:

1. I am submitting this declaration in relation to the above-captioned case.
2. I live in Watertown, NY.
3. I am 35 years old and I live with my husband and daughter.
4. I borrowed federal student loans in order to attend DeVry University and received my bachelor's degree in small business entrepreneurship and business administration, and a dual masters degrees in information security and project management.

I submitted a borrower defense application in June 2017 relating to my attendance at DeVry.

5. I received a notice from the Department of Education telling me that I am an Automatic Discharge Group class member in the above-captioned case.
6. My loan servicer is EdFinancial.
7. As of the date of this declaration, approximately \$6,000 of my federal student loans related to my attendance at DeVry have not been discharged.
8. As of the date of this declaration, some of my DeVry loans appear with a balance due and owing on my credit report.

Exhibit 27

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et al*

Case No.: 19-cv-03674-WHA

Plaintiffs,

v.

MIGUEL CARDONA, in her official
capacity as Secretary of the United States
Department of Education, and the UNITED
STATES DEPARTMENT OF EDUCATION

DECLARATION OF JULIE SAMS

Defendants.

I, Julie Sams, state as follows:

1. I am submitting this declaration in relation to the above-captioned case.
2. I live in Loveland, Ohio.
3. I am 30 years old.
4. I borrowed federal student loans in order to attend The Art Institute of Ohio-Cincinnati (Art Institute) and obtained a bachelor’s degree in graphic design. The school misled students, including me, about its ability to help us get jobs in the field of graphic design. They also misled us about the teachers and their expertise. I passed up the opportunity to go to a reputable college because of the lies that I was told by the Art Institute. I was only 17 years old and just trying to make the right decision for my future.
5. I submitted a borrower defense application in 2018 relating to my experience at Art Institute.
6. I received a notice from the Department of Education telling me that I am an Automatic Discharge Group class member in the above-captioned case.
7. My loan servicer is EdFinancial.

Exhibit 28

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THERESA SWEET, *et al*

Case No.: 19-cv-03674-WHA

Plaintiffs,

v.

MIGUEL CARDONA, in her official capacity as Secretary of the United States Department of Education, and the UNITED STATES DEPARTMENT OF EDUCATION

DECLARATION OF CHRISTINA SHAW

Defendants.

I, Christina Shaw, state as follows:

1. I am submitting this declaration in relation to the above-captioned case.
2. I am originally from Texas and now live in Drums, Pennsylvania.
3. I earned my bachelor’s degree from Texas Women’s University in 2007. After I graduated, I worked for a non-profit and struggled to make ends meet.
4. During that time I started seeing advertisements for the University of Phoenix (“UoP”), which promoted how getting a degree there could help you get a better job. I contacted UoP and they immediately started using high-pressure sales tactics to get me to enroll.
5. I enrolled at UoP in 2008 in the Master’s of Business Administration (MBA) program. I soon realized, however, that attending UoP would not help me in my career at all, contrary to what the school had represented. I went on a number of job interviews where the interviewers dismissed me after they heard that I was going to UoP for my MBA. One interviewer told me that it was a “garbage degree” and if I was going there then I was “not smart enough to work at” his company.

1 6. As a result, I withdrew from UoP and started looking for other options to pursue a
2 graduate degree.

3 7. I enrolled at Colorado Technical University (“CTU”) in their MBA program in
4 2009. I asked whether I could transfer my credits from UoP, and CTU refused to take any of
5 them, so I had to start over.

6 8. It soon became clear that CTU was no different from UoP. In fact, the classes I
7 took at CTU were almost identical to UoP’s in their form and content. CTU also used high-
8 pressure tactics to try to keep me enrolled. For instance, they contacted me constantly saying that
9 I needed to sign up for the next set of classes because they were almost full—but then a
10 classmate told me that his original section had actually been cancelled because it was *under-*
11 enrolled. I withdrew from CTU as well.

12 9. I borrowed federal student loans in order to attend UoP and CTU. I also took out
13 federal student loans for my undergraduate degree and for classes I later took at Park University
14 to qualify for the Certified Public Accountant exam.

15 10. In 2010, I consolidated all of my FFEL loans from UoP and Texas Women’s
16 University into two Direct Consolidation Loans. All of the money I have paid toward my UoP
17 loans since 2010 has been paid to the Department of Education.

18 11. Over the years, I struggled to stay current on my student loan payments as I was
19 living paycheck to paycheck. I defaulted on my loans in 2013 and again in 2016. Each time, in
20 order to come out of default, I had to consolidate my loans again, which caused interest to
21 capitalize.

22 12. In October 2020, I consolidated all of my outstanding federal student loans into
23 two Direct Consolidation Loans. The combined balance of the two Consolidation Loans was
24 \$140,862 (\$20,500 in principal from UoP; \$20,500 in principal from CTU; \$34,068 in principal
25 from Texas Women’s University; \$12,351 in principal from Park University; and \$53,443 in
26 accumulated interest). As of the date of this declaration, the balance is nearly identical.

1 13. My first borrower defense application was for my UoP loans. That application
2 was denied, supposedly because I did not have enough written evidence. But many of the
3 misrepresentations that UoP made to me were over the phone.

4 14. I then re-applied for borrower defense for UoP, and submitted a separate
5 application for my CTU loans.

6 15. I received two notices from the Department of Education on February 28, 2023,
7 telling me that my loans from both UoP and CTU would be discharged under the settlement in
8 this case. I understand that this means I am a member of the automatic relief group.

9 16. My loan servicer is EdFinancial.

10 17. As of the date of this declaration, I have not gotten any settlement relief.

11 18. EdFinancial is still listing a combined balance of \$140,861.60 on my two Direct
12 Consolidation Loans. My balance has not decreased at all since I received the settlement notices
13 on February 28, 2023.

14 19. In January 2024, my car broke down and I had to buy another. When I applied for
15 a car loan, my full federal student loan balance was still on my credit report. Because of my
16 student loan balance and its effect on my debt-to-income ratio, I could only get a loan at 11%
17 interest. But since I need a car to get to work, I took out that loan on January 19, 2024—just days
18 before the settlement relief deadline.

19 20. As of the date of this declaration, the full balances still appear on my credit
20 reports from all three credit reporting agencies.

21 21. EdFinancial has also given me inaccurate information about my settlement relief
22 and recently sent me a bill even though my accounts are supposed to be in forbearance.

23 22. On September 17, 2023, I contacted EdFinancial to ask why my account was
24 starting to accrue interest again even though my loans had not yet been adjusted under the
25 settlement. For about six weeks, I received no response. Finally, on Friday, November 3, 2023, I
26 received an email from EdFinancial, where they stated that because the borrower defense process
27 “involves millions of borrowers, the Department of Education does not provide a time frame as
28

1 to when it will be completed.” This was not true: the Department was required to complete my
2 relief by January 28, 2024.

3 23. The November 3 email from EdFinancial also stated that they knew I was covered
4 by borrower defense and “there are no payments due during this process.” But recently, on
5 March 17, 2024, I received a bill from EdFinancial stating that I owe them a monthly payment of
6 \$323.03 which is supposedly due on April 16, 2024.

7 24. I have gotten the runaround from both EdFinancial and the Department of
8 Education when it comes to trying to understand the situation with my settlement relief and my
9 forbearance. When I call the Department’s borrower defense hotline, someone either hangs up on
10 me or tells me to contact my servicer. When I call my servicer, they tell me to call the
11 Department of Education. I have no idea how to get accurate information about my situation.

12 25. This entire process has been a major burden on my mental and emotional health.
13 I’m constantly worrying about being back in a position where I’m not able to afford my student
14 loan payments, and where I have to move out of a safe situation and into a place that’s not as
15 safe just in order to have lower rent.

16 26. It is unfair and unrealistic to expect individual student loan borrowers to
17 constantly be checking up on servicers and the U.S. government to see if they are doing their
18 jobs. I just want to have this burden finally lifted and receive the relief that I was promised.

19
20 I swear under penalty of perjury that the foregoing is true and correct.

21
22 Executed on March 19, 2024 in Luzerne, PA (county, state).

23
24 

25 Christina Shaw

Exhibit 29

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THERESA SWEET, *et al*

Plaintiffs,

v.

MIGUEL CARDONA, in her official
capacity as Secretary of the United States
Department of Education, and the UNITED
STATES DEPARTMENT OF EDUCATION

Defendants.

Case No.: 19-cv-03674-WHA

**DECLARATION OF
REILLY LOYND**

I, Reilly Loynd, state as follows:

1. I am submitting this declaration in relation to the above-captioned case.
2. I am a paralegal advocate at the Project on Predatory Lending (PPSL). I have worked at PPSL since June 2022.
3. One of my responsibilities as a paralegal advocate is to review all of the outreach we receive from borrowers, including *Sweet* class members.
4. In September 2023, we began receiving outreach from *Sweet* class members who were receiving bills from their federal student loan servicers or were being told by their servicers that they would have to return to repayment starting in October 2023.
5. Since October 27, 2023—the date the Department reportedly sent its “do not bill list” to servicers—we have heard from 1,985 *Sweet* class members who report that they were billed in error by their federal student loan servicers.
6. During the months of September through December 2023, I prepared spreadsheets listing the names and identifying information of class members who reached out to us about being billed in error. PPSL sent these spreadsheets to the Department of Justice by email on October 6, 2023;

1 November 1, 2023; and December 14, 2023. In total, we provided the Department of Justice with
2 the names of 1,207 class members who were being billed in error.

3 7. During January 2024 alone, we received four times as much outreach as usual via our
4 general intake survey, emails, and voicemails. This meant that rather than hearing from an average
5 of 25 borrowers per week about *Sweet*-related issues, we heard from 100. Ninety percent of this
6 outreach was from borrowers in the automatic relief group who were concerned that they had not
7 yet received *Sweet* relief.


8 8. Throughout January 2024, we heard from a variety of borrowers who reported receiving
9 inaccurate information, either from their servicers or from the Department of Education's borrower
10 defense hotline. For example, on January 16, 2024, one borrower said that they "called the
11 Borrower Defense Hotline - and, they said the deadline is not Jan 28th and there is a new deadline
12 in mid-August to cancel the *Sweet v. Cardona* related loans." On January 14, 2024, another
13 borrower said, "I reached out to Aidvantage, and they are saying that they do not have to provide
14 relief by 1/28, even though I am a full class participant. They are saying they have 7-8 months
15 from that date." On the same day, a third borrower wrote, "I am an automatic relief group class
16 member of the *Sweet v. Cardona* settlement, and I am entitled to full loan discharge including a
17 refund of my past student loan payments on or before Jan. 28, 2024. Despite this due date being a
18 court-ordered mandate by Senior District Judge William Alsup, EdFinancial representatives have
19 communicated to me on one occasion that they have no timeline for providing my relief and on
20 another, that time to process will likely go beyond January 28th."

21 9. Since January 28, 2024, over 2,500 class members have reached out to tell us that they
22 have not received full settlement relief.

23 I swear under penalty of perjury that the foregoing is true and correct.

24 Executed on: 19/03/2024

25 LOS ANGELES COUNTY, CALIFORNIA

26
27 

28 REILLY LOYND