

Exhibit A



United States of America
Federal Trade Commission

CIVIL INVESTIGATIVE DEMAND

1. TO

DeVry Inc.
3005 Highland Parkway
Downers Grove, Illinois 60515

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

2. ACTION REQUIRED

☐ You are required to appear and testify.

LOCATION OF HEARING

YOUR APPEARANCE WILL BE BEFORE

DATE AND TIME OF HEARING OR DEPOSITION

☒ You are required to produce all documents described in the attached schedule that are in your possession, custody, or control, and to make them available at your address indicated above for inspection and copying or reproduction at the date and time specified below.

☒ You are required to answer the interrogatories or provide the written report described on the attached schedule. Answer each interrogatory or report separately and fully in writing. Submit your answers or report to the Records Custodian named in Item 4 on or before the date specified below.

DATE AND TIME THE DOCUMENTS MUST BE AVAILABLE

FEB 24 2014

3. SUBJECT OF INVESTIGATION

See attached resolution

4. RECORDS CUSTODIAN/DEPUTY RECORDS CUSTODIAN

Thomas J. Syta / Ann Stahl
Federal Trade Commission -- Western Region
10877 Wilshire Blvd., #700
Los Angeles, CA 90024

5. COMMISSION COUNSEL

Christina Tusan
Federal Trade Commission -- Western Region
10877 Wilshire Blvd., #700
Los Angeles, CA 90024 (310) 824-4343

DATE ISSUED

1/23/14

COMMISSIONER'S SIGNATURE

Julie Brill

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documents or the submission of answers and report in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances of such production or responsible for answering each interrogatory or report question. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

TRAVEL EXPENSES

Use the enclosed travel voucher to claim compensation to which you are entitled as a witness for the Commission. The completed travel voucher and this demand should be presented to Commission Counsel for payment. If you are permanently or temporarily living somewhere other than the address on this demand and it would require excessive travel for you to appear, you must get prior approval from Commission Counsel.

A copy of the Commission's Rules of Practice is available online at <http://bit.ly/FTCRulesofPractice>. Paper copies are available upon request.

Form of Certificate of Compliance*

I/We do certify that all of the documents and information required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this Civil Investigative Demand has not been submitted, the objections to its submission and the reasons for the objection have been stated.

If an interrogatory or a portion of the request has not been fully answered or a portion of the report has not been completed, the objections to such interrogatory or uncompleted portion and the reasons for the objections have been stated.

Signature _____

Title _____

Sworn to before me this day

Notary Public

*In the event that more than one person is responsible for complying with this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Edith Ramirez, Chairwoman**
 Julie Brill
 Maureen K. Ohlhausen
 Joshua D. Wright

**RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC
INVESTIGATION OF SECONDARY OR POSTSECONDARY
EDUCATIONAL PRODUCTS OR SERVICES OR
EDUCATIONAL ACCREDITATION PRODUCTS OR SERVICES**

File No. P138402

Nature and Scope of Investigation:

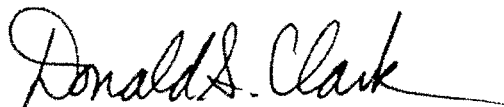
To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of secondary or postsecondary educational products or services, or educational accreditation products or services, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain redress for injury to consumers or others would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

A handwritten signature in black ink, reading "Donald S. Clark". The signature is fluid and cursive, with a long horizontal stroke at the end.

Donald S. Clark
Secretary

Issued: November 14, 2013

**CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS AND ANSWERS
TO WRITTEN INTERROGATORIES**

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. “**Academic program**” means **any** training program, course of study, concentration **or** program of study that results, **or** can result, in a degree, diploma, certificate, credential license **or** ability to sit for a licensing exam.

B. “**Advertisement**” **or** “**advertising**” **or** “**ad**” shall mean **any** written **or** verbal statement, illustration, **or** depiction, whether in English **or** **any** other language, that is designed to effect a sale **or** create interest in the purchasing of goods **or** services, whether it appears on **or** in a label, package, package insert, radio, television, cable television, brochure, newspaper, magazine, pamphlet, leaflet, circular, mailer, book insert, free standing insert, letter, catalogue, poster, chart, billboard, public transit card, point of purchase display, film, slide, audio program transmitted over a telephone system, telemarketing script, onhold script, upsell script, training materials provided to telemarketing firms, program-length commercial (“infomercial”), the Internet, **or** **any** other medium. The terms “**advertisement**,” “**advertising**,” **and** “**ad**” shall be construed to include **any** website that promotes **or** offers **any** of the **company’s academic programs**, including but not limited to www.devry.edu, as well as **any** sponsored link (including **any** text **or** graphic accompanying such sponsored link) placed **or** delivered in connection with **any** online **advertising** network **or** **advertisement** delivery, including but not limited to search results generated by Google **or** **any** other Internet search engine (*e.g.*, through the Google AdWords program). **Promotional materials** are included in the terms “**advertisement**,” “**advertising**,” **and** “**ad**.”

A request for a copy of **each** different **advertisement** shall mean:

1. In the case of print **advertisements**, including transit/outdoor, direct mail, **and** free standing inserts, the **ad** in the form made available for customers to read.
2. In the case of radio **advertisements**, other audio programming **or** conference calls, a cassette tape **or** compact disc (CD) recording **and** a written script for **each advertisement**.
3. In the case of television **advertisements**, including infomercials, a DVD, as well as a photoboard **or** a transcription for **each advertisement**.
4. In the case of **advertisements** displayed **or** accessible as Web pages on the Internet **or** in a similar format on a commercial online service, a printout of **all** screens **or** pages displayed **or** accessible online; the date the information was initially placed online; **and all** information necessary to view **or** access the

information online (*i.e.*, for Web pages, **all** electronic addresses, **or** URLs, at which the information is accessible, including **any** “mirrored” sites **and all documents** showing metatags for the pages). For similar **advertising** on commercial online services, provide the name of the commercial online services **and** the appropriate “Key,” “Go,” **or** “Jump” words; a transcript of **any** audio **or** video clips contained in the screens **or** pages; **and** identification of **any** audio, video, **or** other programs necessary to hear **or** view the clips; **and** the name, mailing address, **and** telephone number of **any** entity with whom **you** arranged for placement of the information online (*i.e.*, the owner of the Internet domain name(s) **and**, if different, the owner of the server(s) through which the Web page is made accessible on the Internet).

5. In the case of files archived **or** accessible online (*e.g.*, at FTP sites, on bulletin boards, **or** as part of a Web page), the filename **and** file date of the file, along with the date it initially was posted online; a printout of the file, if feasible; **all** information necessary to locate, download, **and** view the file, including, where applicable, the name of the bulletin board **and** the category, topic, **or** file area where the file is located; **and the identity of any** software necessary to decompress the files. In the case of files archived on forums **or** bulletin boards found in commercial online services, provide the name of the online service **and** the “Key,” “Go,” **or** “Jump” words to access the bulletin board; in the case of files archived **or** accessible on the Internet at FTP sites, at USENET sites, **or** on Web pages, **all** electronic addresses at which the file is available, including **any** “mirrored” sites; in the case of files archived on dial-in bulletin boards, provide the telephone number to access the bulletin board, **and** the name, business telephone number, **and** mailing address of the owner **or** operator of the bulletin board.
6. In the case of messages posted on bulletin boards, a printout of the message posted, the date(s) it was posted, **and** information sufficient to locate **and** access the bulletin board areas where the information was posted.
7. In the case of messages disseminated via email, a printout of the email message, the date(s) it was sent, **and** the electronic address from which the message was sent. In addition, if a LISTSERV **or** other mass mailing mechanism was utilized, provide the name of the LIST used to send the message, the email address for subscribing to the LISTSERV **or** similar mechanism, **and**, if different, the email address to which messages are submitted for mass mailing.

C. “**And**,” as well as “**or**,” shall be construed both conjunctively **and** disjunctively, as necessary, in order to bring within the scope of **any** specification in this Schedule **all** information that otherwise might be construed to be outside the scope of the specification.

D. “**Any**” shall be construed to include “**all**,” **and** “**all**” shall be construed to include the word “**any**.”

E. “**Call center**” shall mean a telephone service facility set up to handle inbound **or**

outbound calls.

F. **“CID”** shall mean the Civil Investigative Demand, including the attached Resolution **and** this Schedule, **and** including the Definitions, Instructions, **and** Specifications.

G. **“Communication”** shall mean **any** transmission **or** receipt of facts, information, opinions, **or** thought, whether conveyed in writing, orally, electronically, **or** by **any** other means, including written memorializations of oral **communications**.

H. **“Company” or “DeVry”** shall mean DeVry Inc., DeVry University, DeVry College of New York, **and** their wholly **or** partially owned subsidiaries (including but not limited to Advanced Academics, Becker Professional Education, Chamberlain College of Nursing, Carrington, Western Career College, Carrington College, Apollo College, **and** Becker Professional Education), unincorporated divisions, joint ventures, operations under assumed names, **and** affiliates, **and all** directors, officers, employees, agents, consultants, **and** other **persons** working for **or** on behalf of the foregoing. This term shall include **any** descriptor used by DeVry Inc. The term shall exclude **any** operations of the **company** that occur outside of the United States.

I. **“Document”** shall mean the complete original **and any** non-identical copy (whether different from the original because of notations on the copy **or** otherwise), regardless of origin **or** location, of **any** written, typed, printed, transcribed, filmed, punched, **or** graphic matter of **every** type **and** description, however **and** by whomever prepared, produced, disseminated **or** made, including but not limited to **any advertisement**, book, pamphlet, periodical, **contract**, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book **or** label. **“Document” shall also include all documents, materials, and information, including Electronically Stored Information, within the meaning of the Federal Rules of Civil Procedure.**

J. **“Each”** shall be construed to include **“every,” and “every”** shall be construed to include **“each.”**

K. **“Electronically stored information” or “ESI”** shall mean the complete original **and any** non-identical copy (whether different from the original because of notations, different metadata, **or** otherwise), regardless of origin **or** location, of **any** writings, drawings, graphs, charts, photographs, sound recordings, images, **and** other data **or** data compilations stored in **any** electronic medium from which information can be obtained either directly **or**, if necessary, after translation by **you** into a reasonably usable form. This includes, but is not limited to electronic mail, instant messaging, videoconferencing, **and** other electronic correspondence (whether active, archived, **or** in a deleted items folder), word processing files, spreadsheets, databases, **and** video **and** sound recordings, whether stored on: cards; magnetic **or** electronic tapes; disks; computer hard drives, network shares **or** servers, **or** other drives; cloud-based platforms; cell phones, PDAs, computer tablets, **or** other mobile devices; **or** other storage media.

L. **“Employment website”** means a website that is intended to be used by **persons** seeking

employment, **or** that posts open positions, **or** that provides advice **or** information to **persons** seeking employment.

M. **“Executive officer”** means anyone with the following titles: Chairman, Chief Executive Officer, Executive Vice President, General Counsel, Corporate Secretary, Chief Administrative Officer, Chief Financial Officer, Division President, President, Senior Vice President, Chief Information Officer, Chief Academic Officer **or** Chief Human Resource Officer.

N. **“Form”** means **any document** that the **company** has provided to more than one individual, whether the **document** is provided without change to more than one individual, **or** is particularized by inserting information related to individuals who use **or** receive the **form**. When a **form** is demanded only an original **form** is required. If the **form** is the type to which particularized information is added when it is used, then one randomly chosen sample with the particularized information inserted (and **all** information identifying the student associated with the **document** redacted), as well as an original version of the **form**, before the particularized information is inserted, is demanded. If the **form** has been changed over time, **each** version of the **form** must be produced.

O. **“FTC” or “Commission”** shall mean the Federal Trade Commission.

P. **“Identify” or “the identity of”** shall be construed to require identification of (a) natural **persons** by name, title, present business affiliation, present business address **and** telephone number, **or** if a present business affiliation **or** present business address is not known, the last known business **and** home addresses; **and** (b) businesses **or** other organizations by name, address, identities of natural **persons** who are officers, directors **or** managers of the business **or** organization, **and** contact **persons**, where applicable.

Q. **“Lead generation company”** means a **person** whose primary business **or** activity is the generation of consumer interest **or** inquiry into products **or** services through the use of a computer program, a database, the Internet **or** other means to obtain the names **or** addresses **or** telephone numbers **or** email addresses of individuals for later sale **or** other disposition to another **company**.

R. **“Mystery shopper program”** means **any** program used to measure quality of service **or** compliance with **any** policy, procedure, rule, guideline, law **or** regulation through the use of **persons** posing as prospective students, students, consumers **or** members of the public.

S. **“Person” or “persons”** shall mean **all** natural persons, corporations, partnerships, **or** other business associations **and** **all** other legal entities, including **all** members, officers, predecessors, assigns, divisions, affiliates, **and** subsidiaries.

T. **“Personal Information”** shall mean individually identifiable information from or about an individual consumer including: (a) a first **and** last name; (b) a home or other physical address, including street name **and** name of city or town; (c) an email address or other online contact information, such as an instant messaging user identifier or a screen name; (d) a telephone number; (e) a Social Security number; (f) a driver’s license or other state-issued identification

number; (g) a financial institution account number; or (h) other credit card, debit card, or financial account information.

U. **“Promotional material”** shall mean **any document or** thing designed **or** used to create interest in the purchasing of goods **or** services that is not normally counted as **advertising**, including but not limited to: press releases, video news releases, **and** other **communications** with **any** print, television, **or** radio media, **or any** website designer, developer, manager, **or** host, **or any** online service; coupons; **and** payments for shelf space.

V. **“Referring to” or “relating to” or “refer” or “relate to”** shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, **or** pertaining to, in whole **or** in part.

W. **“Supporting”** means evidencing, substantiating, validating, verifying, corroborating, providing, confirming **or** demonstrating.

X. **“You” or “your”** shall mean the **person** to whom this **CID** is issued, **and** includes the **company**.

Y. The singular shall include the plural, **and** the plural shall include the singular.

II. INSTRUCTIONS

A. **Sharing of Information:** The **Commission** often makes its files available to other civil **and** criminal federal, state, local, **or** foreign law enforcement agencies. The **Commission** may make information supplied by **you** available to such agencies where appropriate pursuant to the Federal Trade Commission Act **and** 16 C.F.R. § 4.11 (c) **and** (j). Information **you** provide may be used in **any** federal, state, **or** foreign civil **or** criminal proceeding by the **Commission or** other agencies.

B. **Meet and Confer:** **You** must contact **Christina Tusan at 310-824-4343** as soon as possible to schedule a meeting (telephonic **or** in person) to be held within fourteen (14) days after receipt of this **CID**, **or** before the deadline for filing a petition to quash, whichever is first, in order to discuss compliance **and** to address **and** attempt to resolve **all** issues, including issues **relating to** protected status **and** the form **and** manner in which claims of protected status will be asserted, **and** the submission of **ESI and** other electronic productions as described in these Instructions. Pursuant to 16 C.F.R. § 2.7(k), **you** must make available personnel with the knowledge necessary for resolution of the issues relevant to compliance with this **CID**, including but not limited to personnel with knowledge about **your** information **or** records management systems, relevant materials such as organizational charts, **and** samples of material required to be produced. If **any** issues **relate to ESI**, **you** must make available a **person** familiar with **your ESI** systems **and** methods of retrieval.

C. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from **January 1, 2009 until the date of full and complete**

compliance with this CID.

D. **Claims of Privilege:** If **any** material called for by this **CID** is withheld based on a claim of privilege, work product protection, **or** statutory exemption, **or any** similar claim (*see* 16 C.F.R. § 2.7(a)(4)), the claim must be asserted no later than the return date of this **CID**. In addition, pursuant to 16 C.F.R. § 2.11(a)(1), submit, together with the claim, a detailed log of the items withheld. The information in the log shall be of sufficient detail to enable the **Commission** staff to assess the validity of the claim for **each document**, including attachments, without disclosing the protected information. Submit the log in a searchable electronic format, **and**, for **each document**, including attachments, provide:

1. **Document** control number(s);
2. The full title (if the withheld material is a **document**) **and** the full file name (if the withheld material is in electronic form);
3. A description of the material withheld (for example, a letter, memorandum, **or** email), including **any** attachments;
4. The date the material was created;
5. The date the material was sent to **each** recipient (if different from the date the material was created);
6. The email addresses, if **any**, **or** other electronic contact information to the extent used in the **document**, from which **and** to which **each document** was sent;
7. The names, titles, business addresses, email addresses **or** other electronic contact information, **and** relevant affiliations of **all** authors;
8. The names, titles, business addresses, email addresses **or** other electronic contact information, **and** relevant affiliations of **all** recipients of the material;
9. The names, titles, business addresses, email addresses **or** other electronic contact information, **and** relevant affiliations of **all persons** copied on the material;
10. The factual basis **supporting** the claim that the material is protected; **and**
11. **Any** other pertinent information necessary to support the assertion of protected status by operation of law.

16 C.F.R. § 2.11(a)(1)(i)-(xi).

In the log, **identify** by an asterisk **each** attorney who is an author, recipient, **or person** copied on the material. The titles, business addresses, email addresses, **and** relevant affiliations of **all** authors, recipients, **and persons** copied on the material may be provided in a legend

appended to the log. However, provide in the log the information required by Instruction D.6. 16 C.F.R. § 2.11(a)(2). The lead attorney **or** attorney responsible for supervising the review of the material **and** who made the determination to assert the claim of protected status must attest to the log. 16 C.F.R. § 2.11(a)(1).

If only some portion of **any** responsive material is privileged, **all** non-privileged portions of the material must be submitted. Otherwise, produce **all** responsive information **and** material without redaction. 16 C.F.R. § 2.11(c). The failure to provide information sufficient to support a claim of protected status may result in denial of the claim. 16 C.F.R. § 2.11(a)(1).

E. **Document Retention:** You shall retain **all** documentary materials used in the preparation of responses to the specifications of this **CID**. The **Commission** may require the submission of additional **documents** at a later time during this investigation. Accordingly, you should suspend **any** routine procedures for **document** destruction **and** take other measures to prevent the destruction of **documents** that are in **any** way relevant to this investigation during its pendency, irrespective of whether you believe such **documents** are protected from discovery by privilege **or** otherwise. See 15 U.S.C. § 50; see also 18 U.S.C. §§ 1505, 1519.

F. **Petitions to Limit or Quash:** Any petition to limit **or** quash this **CID** must be filed with the Secretary of the **Commission** no later than twenty (20) days after service of the **CID**, **or**, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth **all** assertions of protected status **or** other factual **and** legal objections to the **CID**, including **all** appropriate arguments, affidavits, **and** other **supporting** documentation. 16 C.F.R. § 2.10(a)(1). Such petition shall not exceed 5,000 words as set forth in 16 C.F.R. § 2.10(a)(1) **and** must include the signed separate statement of counsel required by 16 C.F.R. § 2.10(a)(2). **The Commission will not consider petitions to quash or limit absent a pre-filing meet and confer session with Commission staff and, absent extraordinary circumstances, will consider only issues raised during the meet and confer process.** 16 C.F.R. § 2.7(k); see also § 2.11(b).

G. **Modification of Specifications:** If you believe that the scope of the required search **or** response for **any** specification can be narrowed consistent with the **Commission's** need for **documents or** information, you are encouraged to discuss such possible modifications, including **any** modifications of definitions **and** instructions, with **Christina Tusan at 310-824-4343**. **All** such modifications must be agreed to in writing by the Bureau Director, **or** a Deputy Bureau Director, Associate Director, Regional Director, **or** Assistant Regional Director. 16 C.F.R. § 2.7(l).

H. **Certification:** A **responsible corporate officer** shall certify that the response to this **CID** is complete. This certification shall be made in the form set out on the back of the **CID** form, **or** by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

I. **Scope of Search:** This **CID** covers **documents and** information in **your** possession **or** under **your** actual **or** constructive custody **or** control, including but not limited to **documents and** information in the possession, custody, **or** control of **your** attorneys, accountants, directors, officers, employees, **and** other agents **and** consultants, whether **or** not such **documents and**

information were received from **or** disseminated to **any person or** entity.

J. **Document Production:** You shall produce the documentary material by making **all** responsive **documents** available for inspection **and** copying at **your** principal place of business. Alternatively, **you** may elect to send **all** responsive **documents** to **Ann Stahl**, Federal Trade Commission, 10877 Wilshire Blvd., Suite 700, Los Angeles, California 90024. Notice of **your** intended method of production shall be given by email **or** telephone to **Christina Tusan**, **ctusan@ftc.gov**, **310-824-4343** at least five days prior to the return date.

K. **Document Identification:** **Documents** that may be responsive to more than one specification of this **CID** need not be submitted more than once; however, **your** response should indicate, for **each document** submitted, **each** specification to which the **document** is responsive. If **any documents** responsive to this **CID** have been previously supplied to the **Commission**, **you** may comply with this **CID** by identifying the **document(s)** previously provided **and** the date of submission. **Documents** should be produced in the order in which they appear in **your** files **or** as electronically stored **and** without being manipulated **or** otherwise rearranged; if **documents** are removed from their original folders, binders, covers, containers, **or** electronic source in order to be produced, then the **documents** shall be identified in a manner so as to clearly specify the folder, binder, cover, container, **or** electronic media **or** file paths from which such **documents** came. In addition, number by page (**or** file, for those **documents** produced in native electronic format) **all documents** in **your** submission, preferably with a unique Bates identifier, **and** indicate the total number of **documents** in **your** submission.

L. **Production of Copies:** Unless otherwise stated, legible photocopies (**or** electronically rendered images **or** digital copies of native electronic files) may be submitted in lieu of original **documents**, provided that the originals are retained in their state at the time of receipt of this **CID**. Further, copies of originals may be submitted in lieu of originals only if they are true, correct, **and** complete copies of the original **documents**; provided, however, that submission of a copy shall constitute a waiver of **any** claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in **any Commission** proceeding **or** court of law; **and** provided further that **you** shall retain the original **documents** **and** produce them to **Commission** staff upon request. Copies of marketing materials **and** advertisements shall be produced in color, **and** copies of other materials shall be produced in color if necessary to interpret them **or** render them intelligible.

M. **Electronic Submission of Documents:** The following guidelines **refer to** the production of **any Electronically Stored Information ("ESI") or** digitally imaged hard copy **documents**. Before submitting **any** electronic production, **you** must confirm with the **Commission** counsel named above that the proposed formats **and** media types will be acceptable to the **Commission**. The **FTC** requests Concordance load-ready electronic productions, including DAT **and** OPT load files.

1. **Electronically Stored Information:** **Documents** created, utilized, **or** maintained in electronic format in the ordinary course of business should be delivered to the **FTC** as follows:

- a. Spreadsheet **and** presentation programs, including but not limited to Microsoft Access, SQL, **and** other databases, as well as Microsoft Excel **and** PowerPoint files, must be produced in native format with extracted text **and** metadata. Data compilations in Excel spreadsheets, **or** in delimited text formats, must contain **all** underlying data un-redacted with **all** underlying formulas **and** algorithms intact. **All** database productions (including structured data **document** systems) must include a database schema that defines the tables, fields, relationships, views, indexes, packages, procedures, functions, queues, triggers, types, sequences, materialized views, synonyms, database links, directories, Java, XML schemas, **and** other elements, including the use of **any** report writers **and** custom user data interfaces;
 - b. **All ESI** other than those **documents** described in (1)(a) above must be provided in native electronic format with extracted text **or** Optical Character Recognition (OCR) **and all** related metadata, **and** with corresponding image renderings as converted to Group IV, 300 DPI, single-page Tagged Image File Format (TIFF) **or** as color JPEG images (where color is necessary to interpret the contents);
 - c. **Each** electronic file should be assigned a unique **document** identifier (“DocID”) **or** Bates reference.
2. **Hard Copy Documents: Documents** stored in hard copy in the ordinary course of business should be submitted in an electronic format when at **all** possible. These **documents** should be true, correct, **and** complete copies of the original **documents** as converted to TIFF (or color JPEG) images with corresponding **document**-level OCR text. Such a production is subject to the following requirements:
- a. **Each** page shall be endorsed with a **document** identification number (which can be a Bates number **or** a **document** control number); **and**
 - b. Logical **document** determination should be clearly rendered in the accompanying load file **and** should correspond to that of the original **document**; **and**
 - c. **Documents** shall be produced in color where necessary to interpret them **or** render them intelligible.
3. For **each document** electronically submitted to the **FTC**, **you** should include the following metadata fields in a standard ASCII delimited Concordance DAT file:
- a. **For electronic mail:** begin Bates **or** unique **document** identification number (“DocID”), end Bates **or** DocID, mail folder path (location of email in personal folders, subfolders, deleted **or** sent items), custodian, from, to, cc, bcc, subject, date **and** time sent, date **and** time received, **and**

- complete attachment identification, including the Bates **or** DocID of the attachments (AttachIDs) delimited by a semicolon, MD5 **or** SHA Hash value, **and** link to native file;
- b. **For email attachments:** begin Bates **or** DocID, end Bates **or** DocID, parent email ID (Bates **or** DocID), page count, custodian, source location/file path, file name, file extension, file size, author, date **and** time created, date **and** time modified, date **and** time printed, MD5 **or** SHA Hash value, **and** link to native file;
 - c. **For loose electronic documents (as retrieved directly from network file stores, hard drives, etc.):** begin Bates **or** DocID, end Bates **or** DocID, page count, custodian, source media, file path, filename, file extension, file size, author, date **and** time created, date **and** time modified, date **and** time printed, MD5 **or** SHA Hash value, **and** link to native file;
 - d. **For imaged hard copy documents:** begin Bates **or** DocID, end Bates **or** DocID, page count, source, **and** custodian; **and** where applicable, file folder name, binder name, attachment range, **or** other such references, as necessary to understand the context of the **document** as maintained in the ordinary course of business.
4. If **you** intend to utilize **any** de-duplication **or** email threading software **or** services when collecting **or** reviewing information that is stored in **your** computer systems **or** electronic storage media, **or** if **your** computer systems contain **or** utilize such software, **you** must contact the **Commission** counsel named above to determine whether **and** in what manner **you** may use such software **or** services when producing materials in response to this Request.
 5. Submit electronic productions as follows:
 - a. With passwords **or** other **document**-level encryption removed **or** otherwise provided to the **FTC**;
 - b. As uncompressed electronic volumes on size-appropriate, Windows-compatible, media;
 - c. **All** electronic media shall be scanned for **and** free of viruses;
 - d. Data encryption tools may be employed to protect privileged **or** other personal **or** private information. The **FTC** accepts TrueCrypt, PGP, **and** SecureZip encrypted media. The passwords should be provided in advance of delivery, under separate cover. Alternate means of encryption should be discussed **and** approved by the **FTC**; **and**

- e. Please mark the exterior of **all** packages containing electronic media sent through the U.S. Postal Service **or** other delivery services as follows:

**MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION.**

- 6. **All** electronic files **and** images shall be accompanied by a production transmittal letter which includes:
 - a. A summary of the number of records **and all** underlying images, emails, **and** associated attachments, native files, **and** databases in the production; **and**
 - b. An index that identifies the corresponding consecutive **document** identification number(s) used to **identify each** person's **documents and**, if submitted in paper form, the box number containing such **documents**. If the index exists as a computer file(s), provide the index both as a printed hard copy **and** in machine-readable form (provided that the **Commission** counsel named above determines prior to submission that the machine-readable form would be in a format that allows the agency to use the computer files). The **Commission** counsel named above will provide a sample index upon request.
- 7. **A Bureau of Consumer Protection Production Guide is available upon request from the Commission counsel named above. This guide provides detailed directions on how to fully comply with this instruction.**

N. **Sensitive Personally Identifiable Information:** Unless specifically requested by a specification in this **CID**, do not produce **any** Sensitive Personally Identifiable Information ("Sensitive PII") **or** Sensitive Health Information ("SHI") prior to discussing the information with **Commission** counsel. If **any document** responsive to a particular specification contains unresponsive Sensitive PII **or** SHI, redact the unresponsive Sensitive PII **or** SHI prior to producing the **document**.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; **or** an individual's name **or** address **or** phone number in combination with one **or** more of the following: date of birth; Social Security number; driver's license number **or** other state identification number **or** a foreign country equivalent; passport number; financial account number; credit card number; **or** debit card number. Sensitive health information includes medical records **and** other individually identifiable health information **relating to** the past, present, **or** future physical **or** mental health **or** conditions of an individual, the provision of health care to an individual, **or** the past, present, **or** future payment for the provision of health care to an individual.

O. **Information Identification:** **Each** specification **and** subspecification of this **CID** shall be answered separately **and** fully in writing under oath. **All** information submitted shall be

clearly **and** precisely identified as to the specification(s) **or** subspecification(s) to which it is responsive.

P. **Submission of Documents in lieu of Interrogatory Answers:** Previously existing **documents** that contain the information requested in **any** written Interrogatory may be submitted as an answer to the Interrogatory. In lieu of identifying **documents** requested in **any** Interrogatory, **you** may, at **your** option, submit true copies of the **documents** responsive to the Interrogatory, provided that **you** clearly indicate the specific Interrogatory to which such **documents** are responsive.

Q. **Certification of Records of Regularly Conducted Activity:** Attached is a Certification of Records of Regularly Conducted Activity, which may reduce the need to subpoena the **company** to testify at future proceedings in order to establish the admissibility of **documents** produced in response to this **CID**. **You** are asked to execute this Certification **and** provide it with **your** response.

R. This **CID** is issued in conformance with the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. § 3401, et seq. To the extent **you** believe **you** are a 'financial institution,' as the term is defined under RFPA, please contact **FTC** staff attorney Christina Tusan at 310-824-4343 before providing responsive **documents**.

S. In light of the nonpublic nature of this investigation, it is also requested that **you** not disclose the receipt of the **CID** before complying with the requests herein, except as required by law or court order. In addition, if **you** determine for **any** reason that compliance with **any** specification seeking student information requires that **you** provide advance notice to the student, please contact **FTC** staff attorney Christina Tusan to discuss.

III. SPECIFICATIONS FOR DOCUMENTARY MATERIALS

Demand is made for the following **documents**:

1. A copy of **each** different **advertisement** for the **company**.
2. **All documents** of **any** date, including but not limited to tests, reports, studies, summaries, **communications**, notes, memoranda, emails **and** written opinions, relied upon by **you** as substantiation for **each** of the following statements in **your advertisements**, regardless of whether **you** believe that the claim is made:
 - a. As a result of obtaining a **DeVry** degree, the vast majority of the people who graduated from **DeVry** in 2012 **and** were actively seeking employment started a job in their field of study within 6 months of graduation. (See, e.g., Exhibit A, copied from www.devry.edu/why-devry/career-outcomes.html; television commercial entitled "Graduation Present," available at <https://www.ispot.tv/ad/7qG5/devry-university-graduation-present>; television

commercial entitled “This is the Guy Graduating,” available at <http://www.ispot.tv/ad/7qSJ/devry-university-this-is-the-guy-graduating>.)

- b. As a result of obtaining a **DeVry** degree, 90% of the people who graduated from **DeVry** in 2012 and were actively seeking employment started a job in their field of study within 6 months of graduation. (*See, e.g.*, Exhibit A, copied from www.devry.edu/why-devry/career-outcomes.html; television commercial entitled “Graduation Present,” available at <https://www.ispot.tv/ad/7qG5/devry-university-graduation-present>; television commercial entitled “This is the Guy Graduating,” available at <http://www.ispot.tv/ad/7qSJ/devry-university-this-is-the-guy-graduating>; tweet, available at <https://twitter.com/DeVryGroup/status/361918144291414017>.)
 - c. As a result of obtaining a **DeVry** degree, 90% of the people who have graduated from **DeVry** since 1975 and were actively seeking employment started a job in their field of study within 6 months of graduation. (*See, e.g.*, www.braintrack.com/college/s/devry-university.)
 - d. As a result of obtaining a **DeVry** degree, the vast majority of the 265,869 undergraduate students who have graduated from **DeVry** since 1975 started a job in their field of study within 6 months of graduation. (*See, e.g.*, www.devry.edu/admissions/working-adults.html.)
 - e. Within one year after graduation, people who graduate from **DeVry** earn significantly more on average than people who graduate with a bachelor’s degree from other colleges and universities. (*See, e.g.*, Exhibit A.)
 - f. As a result of obtaining a DeVry degree, the average starting salary of DeVry graduates active in the job market is more than \$42,000. (*See, e.g.*, Exhibit B.)
3. Regardless of the date of the **document**, **all documents** on which **you** relied in making the following statements:
- a. “Ninety percent of DeVry Universitys calendar 2012 graduates in the active job market were employed in their fields of study within six months of graduation at an average salary of \$43,539.” (DeVry Inc. 2013 10-K, Career Services at 31)
 - b. “For the last ten years, DeVry University graduates have obtained employment at over 95 of the Fortune 100 companies.” (DeVry Inc. 2013 10-K, Career Services at 31)
 - c. “DeVry University works with many Fortune 100 companies to design programs that provide real-world knowledge.” (DeVry Inc. 2013 10-K, Career Services at 31)

- d. “Each year, thousands of DeVry University graduates have started careers in their chosen fields within 6 months or less of their graduation.” (DeVry Inc. 2012 10-K, Career Services at 29)
- e. “Eighty-six percent of DeVry University’s February 2011, June 2011 and October 2011 graduates in the active job market were employed in their fields of study within six months of graduation at an average salary of \$42,626.” (DeVry Inc. 2012 10-K, Career Services at 29)
- f. “DeVry University’s 2009 graduates (associate and bachelor’s degree programs) achieved reported annual compensation ranging from \$30,746 to \$47,540 with an average compensation of \$43,605.” (DeVry Inc. 2010 10-K, Career Services at 30)
- g. “Major employers of DeVry undergraduates include Accenture, Boeing, Ericsson, GE Healthcare, IBM, Intel, J.P. Morgan Chase, Lockheed Martin, L-3 Communications, Northrop Grumman, State Farm, Verizon Wireless, and UPS.” (DeVry Inc. 2010 10-K, Career Services at 30)
- h. “In the 10-year period ending October 2009, DeVry University’s U.S. campuses graduated more than 70,000 students who were eligible for career services assistance (this excludes graduates who continued their education, students from foreign countries not legally eligible to work in the United States, and other categories of students who were not available for employment). More than 59,000 graduates during this 10-year period actively pursued employment or were already employed; 88.6% of those held positions related to their program of study within six months of graduation. For the three undergraduate classes that ended in calendar year 2009, there were 6,561 graduates from DeVry University’s U.S. undergraduate degree and diploma programs eligible for career service assistance, (this excludes students continuing their education, students from foreign countries legally ineligible to work in the United States, and others ineligible for employment). From that pool of graduates, 5,680 actively pursued employment or were already employed. Within six months of graduation, 5,024, or 88.5% of those graduates were employed in positions related to their program of study. This compares to 91.0% who were employed in positions related to their program of study for the three classes that ended in calendar year 2008, and 92.8% who were employed in positions related to their program of study for the three classes that ended in calendar year 2007.” (DeVry Inc. 2010 10-K, Career Services at 29)
- i. “In the 10 year period ending October 2008, DeVry Universitys U.S. campuses graduated more than 69,000 students who were eligible for career services assistance (this excludes graduates who continued their education, students from

foreign countries not legally eligible to work in the United States, and other categories of students who were not available for employment). More than 58,000 graduates during this 10 year period actively pursued employment or were already employed; 89% of those held positions related to their program of study within six months of graduation.” (DeVry Inc. 2009 10-K, Career Services at 29)

- j. “For the three undergraduate classes that ended in calendar year 2008, there were 6,658 graduates from DeVry Universitys U.S. undergraduate degree and diploma programs eligible for career service assistance, excluding the one-year post-baccalaureate information technology program (this excludes students continuing their education, students from foreign countries legally ineligible to work in the United States, and others ineligible for employment). From that pool of graduates, 6,001 actively pursued employment or were already employed. Within six months of graduation, 5,460, or 91% of those graduates were employed in positions related to their program of study. This compares to 92.8% who were employed in positions related to their program of study for the three classes that ended in calendar year 2007, and 91.9% who were employed in positions related to their program of study for the three classes that ended in calendar year 2006. DeVry University believes that a significant number of graduating students currently employed in positions not directly related to their program of study have chosen to not actively seek other employment opportunities. For the three graduating classes in calendar year 2008, there were 438 graduates who were employed but not in positions related to their program of study. Of these individuals, 72% did not conduct an active employment search through DeVry Universitys career services offices.” (DeVry Inc. 2009 10-K, Career Services at 29)
- k. “DeVry University’s 2008 graduates (associate and bachelors degree programs) achieved reported annual compensation ranging from \$33,288 to \$50,071 with an average compensation of \$45,486. Individual compensation levels vary depending upon the graduates previous employment experience, program of study, and geographic area of employment.” (DeVry Inc. 2009 10-K, Career Services at 29)
- l. “Major employers of DeVry undergraduates include Abbott Laboratories, Boeing, Dell, Federal Express, GE Healthcare, Hewlett-Packard, IBM, Intel, J.P. Morgan Chase, Motorola, Northrop Grumman, State Farm, Siemens, and UPS.” (DeVry Inc. 2009 10-K, Career Services at 30)
- m. “In the ten-year period ending October 2007, our U.S. campuses graduated more than 67,000 students who were eligible for career services assistance (this excludes graduates who continued their education, students from foreign countries

not legally eligible to work in the United States, and other categories of students who were not available for employment). More than 57,000 graduates during this ten-year period actively pursued employment or were already employed; 90% of those held positions related to their program of study within six months of graduation.” (DeVry Inc. 2008 10-K, Career Services at 26)

- n. “In 2012, 90% of DeVry University grads actively seeking employment had careers in their field within six months of graduation.” (Exhibit A, copied from www.devry.edu/why-devry/career-outcomes.html)
- o. “DeVry University graduates have worked at 95 of the Fortune 100 companies included in the 2012 Fortune 500 list.” (Exhibit A, copied from www.devry.edu/why-devry/career-outcomes.html)
- p. “One year after graduation, DeVry University grads report earning 15% more than the median earnings reported by all other bachelor’s degree graduates.” (Exhibit A, copied from www.devry.edu/why-devry/career-outcomes.html)
- q. “Since 1975, 265,869 undergraduate students have graduated from DeVry and 90% of those in the active job market were employed in career-related positions within six months of graduation.” (DeVry University, Admissions, Working Adults, www.devry.edu/why-devry/career-outcomes.html)
- r. The following Spanish representation, which is translated into English for purposes of this request (television commercial entitled “Graduados,” which can be located at <https://www.ispot.tv/ad/71f9/devry-university-graduados-spanish>):

Spanish	English Translation
“En el 2012, 90% de los graduados de DeVry University que buscaron empleo de forma activa ejercían su carrera en menos de seis meses.”	In 2012, 90% of DeVry University graduates that were actively looking for work were practicing their career in less than six months.

- s. “Graduates earning \$50,000 or more:

Devry: 53%

Private Schools: 46%

Public Schools: 44%”

(Exhibit C, copied from <http://www.Devryeducationgroup.com>)

- t. “More than 90% of DeVry University graduates who actively pursue employment hold positions in their chosen field within 6 months of graduation. This means students earn more than a degree at DeVry University.” (DeVry University, Featured Faculty Profile, Astrit Mehmeti, www.devry.edu/why-devry/quality_education_faculty/astrit-mehmeti.html)

- u. “[A] large percentage of 2011 DeVry University graduates in the active job market were either employed in their fields before graduating or found jobs within six months of graduation. For those who earned associate degrees, the employment rate was 74 percent; the rate was 88 percent for those who earned bachelor’s degrees.” (2011-2012 DeVry Academic Annual Report at 33, www.devry.edu/academic-annual-report.pdf)
 - v. “90% of our grads actively seeking employment had careers in 6 months” (television commercial entitled “Graduation Present,” available at <https://www.ispot.tv/ad/7qG5/devry-university-graduation-present>)
 - w. “More than 90% of DeVry graduates system-wide in the active job market are employed in their field of study within 6 months of graduation.” (Wisconsin Counsel for Independent Education, College Information, www.wcie-colleges.org/college-information.php?idx=3)
4. For **each advertisement** used to solicit consumers for the **company** that was placed in **any advertising** medium, **documents** sufficient to **identify** the name of the **advertising** medium **and all** dates **and** times **each advertisement** ran in the United States.
 5. **All documents** that tend to call into question **or** disprove **any** of the claims **or** statements listed in Document Specification Nos. 2 **and** 3.
 6. **All communications relating to any** claims **or** statements listed in Document Specifications Nos. 2 **and** 3.
 7. To the extent not already provided in response to **any** other Document Specification, **all documents** of **any** date **relating to any** research **or** data to which the **advertisements** requested in Document Specification No. 1 explicitly **refer**, including but not limited to research on placement rates **and** “annual compensation rates” for **DeVry** graduates to which the www.devry.edu website, **any promotional materials**, **any** Securities and Exchange Commission 10-K filings, **or any** other **advertisement** for the **company** **refers**.
 8. **All documents relating to any** standards, practices, procedures **or** methodologies that have been established **or** utilized to measure, determine **or** calculate placement rates **or** income levels following graduation from **DeVry**, including but not limited to standards, practices, procedures **or** methodologies that were used **or** relied upon to generate the 2011 **and** 2012 data in the following categories in Exhibit B (attached hereto), under the heading “Graduate Employment Statistics” on www.devry.edu:
 - a. Graduates who actively pursued and obtained employment and those already employed in education-related careers within 180 days of graduation;
 - b. Average reported annual compensation;
 - c. Graduates;

- d. Graduates eligible for career assistance;
 - e. Graduates who actively pursued employment for up to 180 days and those who were already employed; **and**
 - f. Graduates employed in education-related positions within 180 days of graduation.
9. To the extent not already provided in response to **any** other Document Specification, **all documents** (excluding **advertisements**) **relating to the company's** student placement rates.
 10. To the extent not already provided in response to **any** other Document Specification, **all documents** (excluding **advertisements**) **relating to any** statement by **you** that the **company's** graduates had been hired by a specific **company or** other employer.
 11. To the extent not already provided in response to **any** other Document Specification, **all documents** (excluding **advertisements**) **relating to any** statement by **you** in **any advertisement or** presentation **referring to any pre-graduation or post-graduation** income earned by **any** of the **company's** graduates.
 12. To the extent not already provided in response to **any** other Document Specification, **all documents** (excluding **advertisements**) **relating to** completion times for **any academic program** offered at **or** through the **company**.
 13. **All documents relating to any** actual **or** proposed changes to **advertising for any academic program you** offer, including but not limited to **any** Web pages **relating to any academic program**.
 14. **All emails, and documents relating to** such emails, that were sent to **or** received by **any of your** employees whose primary responsibilities **relate to** admissions, completion rates, instructor qualifications, disclosures, income of graduates, **or** licensure requirements at **any** of the **company's** locations **and** which **relate to the company's** student placement rates, students' pre-graduation **and** post-graduation income rates, licensure issues, instructor qualifications, student completion times, **advertisements, or** student complaints.
 15. **All emails, and documents relating to** such emails, that were sent **or** received by an **executive officer and** which **relate to** completion rates, job placement rates, students pre-graduation **or** post-graduation income amounts, **or** marketing to the United States military, service members, veterans, **or** their families.
 16. For **each** field of study **available to DeVry students, all documents** reflecting **or** listing jobs that **you** have classified as being in that "field of study" for purposes of calculating whether graduates are employed in "their field of study" as stated in **your advertisements**.
 17. **All documents that relate to any** internal audit of the **company's** placement rates, income rates for graduates, student default rates, **or any** other claims set forth in

Document Specification No. 2 **or** 3.

18. **All documents**, including **any** training materials, **relating to** the **company's** placement rates **or** income rates, completion rates, default rates, **or** the nature **or** amount of fees charged, that were provided to **or** used by staff members of the **company** for the purpose of preparing for **or** making presentations to **any** prospective **or** actual students.
19. **All documents relating to any** minimum placement rates that **any** accreditor **or** governmental agency **or** entity requires the **company** to meet.
20. **All documents relating to** the reason the **company** closed **or** sold **any** campus that had a placement rate below 90% prior to the closure **or** sale of the campus.
21. **All documents relating to any** marketing surveys **or** studies that concern the value **or** benefit of using job placement rates **or** information to persuade students to enroll with the **company or** with **any** other private post-secondary school.
22. **All marketing and advertising plans** for the **company's academic program relating to** the placement rates, graduate income levels **or** student scholarship programs, including, but not limited to materials about **advertising and** marketing strategies, themes, concepts, media recommendations **and** plans, marketing reports, business studies, **and** creative strategies that describe **or** discuss the planned **or** actual approaches for **advertising, marketing, or** promoting the **company's academic program**.
23. **All documents relating to** data on, **or** analysis of, consumer perception, comprehension, **or** recall (including, but not limited to notes, memoranda, data, analyses, copy tests, marketing **or** consumer surveys **and** reports, penetration tests, recall tests, audience reaction tests, **communication** tests, **and** consumer complaints received by **or** known to the **company**) of **any advertisement** (or of **any part of any advertisement**) responsive to Document Specification No. 1.
24. **All documents relating to any** staffing agencies, including **any** temporary placement agencies, that have employed graduates of the **company or** who were paid by the **company** to employ **any** of its graduates.
25. **All documents relating to** the **company** directly employing, **or** funding the employment of, **any** graduates of the **company**, whether on a temporary **or** permanent basis.
26. **All documents relating to any** efforts **or** procedures the **company** has undertaken to verify information that the **company** has obtained from graduates **relating to** their employment after graduation.
27. **All documents relating to any mystery shopper program** operated by **you or** on **your** behalf.
28. **All documents** that the **company** has sent to **or** received from **any** accrediting agency,

including **any** third party **or** agent acting on behalf of **any** accrediting agency, **relating to** **any** accreditation standards, placement rates, **or** other investigations, evaluations, reports **or** audits.

29. Without regard to the time period specified in Instruction II.C, produce **all documents relating to any** efforts by the **company** to obtain accreditation from the Higher Learning Commission (HLC), Western Association of Schools and Colleges (WASC), Accrediting Council for Independent Colleges **and** Schools (ACICS), **or any** other accrediting body, including but not limited to **any** letter of inquiry **or** response to a letter of inquiry, **any** preliminary evidence provided in connection with an application for accreditation, **any** post-interview **or** pre-interview **communications**, **any documents related to** eligibility filings, letters of intent to pursue candidacy, **any** evaluation of the **company's** candidacy application, **any** notes **or** transcripts of **any** hearings conducted by the HLC, WASC, **or** ACICS concerning the **company's** application, **any** evaluations by the HLC, WASC, **or** ACICS, including but not limited to biennial evaluations, **and any** evaluation for initial accreditation conducted by **or** on behalf of the HLC, WASC, **or** ACICS.
30. **All communications since January 1, 2000**, between **you and** the HLC, WASC, **or** ACICS, **relating to any** investigation, inquiry, review, **or** legal action undertaken by **any** of those entities.
31. **All documents** that the **company** has sent to **or** received from **any** accrediting agency, including **any** third party **or** agent acting on behalf of **any** accrediting agency, **relating to** **any** accreditation standards, placement rates, the income levels of **your** graduates, **or** other evaluations, reports **or** audits.
32. **All communications** that the **company** has sent to **or** received from **any** third-party **or** **any** internal auditor that has engaged in **any** review **or** evaluation of the **company's** practices **or** **advertisements**, the placement rates **or** income levels of the **company's** graduates, **your** student completion times, **or** the nature **or** amount of fees **you** have charged **your** students, **and all documents** that **relate to** such **communications**.
33. **All documents relating to any** audits, inquiries **or** site visits by the United States Department of Education **or any** state agency **or** entity.
34. **All documents relating to** consumer testimonials **or** expert endorsements for the **company**, including but not limited to **communications**, contracts, infomercial **or** **advertising** scripts, **or** agreements between **you and any person** providing a testimonial **or** endorsement, **all documents** evidencing compensation provided to such **person or** **persons**, **and any documents** provided to **any** endorser prior to use of his **or** her endorsement.
35. **All documents relating to any** complaint that was made by **or** received from (i) **any** former **or** current DeVry student, **or** anyone acting on such **person's** behalf, (ii) **any** federal, state, **or** local advocacy group, (iii) **any** industry **or** trade association, (iv) any

entity that operates any online-complaint-database website, **or (v) any** media entity, and which **refers or relates to** any of the following:

- a. difficulty **or** lack of success on the part of any **DeVry** graduate in finding a job;
 - b. difficulty **or** lack of success in finding a job in a graduate's field of study;
 - c. **DeVry's** job placement rates;
 - d. the salary **or** wages of jobs that graduates were able **or** unable to find;
 - e. alleged misrepresentations concerning class availability **or** coursework requirements;
 - f. difficulty with registering for any courses, **or** the lack **or** limited availability of any courses;
 - g. drop policies **or** practices, **or** representations about such policies **or** practices;
 - h. billing issues (including but not limited to complaints concerning billing errors, overcharges, changes in the amount due, failure to credit payments, failure to notify students of past due amounts, **or** billing practices with respect to active-duty military);
 - i. discounts (including but not limited to the amount of any discount, the unavailability of any discount, **or** any alleged misrepresentations concerning discounts);
 - j. financial aid (including but not limited to scholarships, DeVry's Educard program **or** any private loans offered by DeVry, difficulty with registering for classes, difficulty with obtaining **or** using financial aid because of past-due balances, disbursement issues, **or** misrepresentations about the availability of financial aid);
 - k. the length of time necessary to complete any **academic program**, **or** alleged misrepresentations concerning the length of time necessary to complete any **academic program**;
 - l. unsolicited **or** undesired telephone calls **or** emails, including alleged Do Not Call violations;
 - m. telemarketing practices **or** representations;
 - n. any issue **related to** the GI bill **or** a student's status as a veteran;
 - o. **any** accreditation-related matter;
 - p. **any** of the **company's** **advertisements**; **or**
 - q. **any** allegedly fraudulent, unlawful, deceptive **or** unfair business practice **or** unfair method of competition.
36. **All communications** between **you and any** federal, state, **or** local government agency **or** entity, **relating to** the **company's** job placement rates, the ability of **DeVry** graduates to find jobs in their field, **any** of the **company's** **advertisements**, **any** accreditation related matter, **any** of the **company's** practices, **or any** allegedly fraudulent, unlawful, deceptive **or** unfair business practice **or** unfair method of competition.
37. **All communications relating to any** issues raised by consumer complaints, including but not limited to internal emails discussing consumer complaints, responses to consumer complaints, emails **or** correspondence forwarding copies of consumer complaints to **any** of **your** employees **or** third parties, **or communications** with **any** third party concerning **any** consumer complaint.

38. **All communications** between **you and** the Advertising Self-Regulation Council, the National Advertising Division, Electronic Retailing Self-Regulation Program, **or any** Better Business Bureau, consumer group, **or** consumer protection entity **relating to the company**.
39. **All communications** between **you and any** merchant processor **or** credit card processor **relating to** charge disputes, complaints of unauthorized charges, canceled **or** closed accounts, **and** chargebacks.
40. For **each** academic term during the applicable time period, **all** fee schedules **and** other **documents** sufficient to show: (a) the standard tuition **and** other fees that the **company** charged for its **academic programs**; **and** (b) **all** tuition discounts that were available **or** offered to students (*e.g.*, military discounts, discounts for carrying a certain number of units, **or** discounts for employment with a particular employer).
41. For **each** academic term, **each** different **document form** that **the company** has provided to **all or any** subgroup of students, prospective students **or** graduates, including but not limited to **documents relating to** enrollment, registration for classes, books **or** other course materials, career placement, post **or** pre-graduation income levels, bills **or** payment notices, fee schedules, collections, tuition, fees **or** fee assessments, discounts, scholarships, loans, **or** other financial aid.
42. **All documents**, including but not limited to **documents** reflecting policies **and** procedures, that were prepared for, used in, **or** circulated in connection with the training of **DeVry employees relating to**: (a) the recruitment of prospective students; (b) the recruitment **and** servicing of military service members, veterans, **or** their families; (c) student admissions; (d) complaints; (e) **advertising**; (f) billing; (g) refunds; (h) cancellation (including but not limited to dropping classes); (i) handling **and** preparing for internal **and** external audits; **and** (j) calculating **and** determining placement rates **and** graduate income levels.
43. **All documents relating to** the “refined brand campaign” discussed in **DeVry’s** 2010 10-K filing, including but not limited to **any** consumer, marketplace research, **any** brand research, **any** broadcast, print **or** internet **advertising**, **any** public relations activities, **or any** social media **or** local marketing efforts.
44. **All documents** constituting a complaint, answer, **any** related exhibits, **or** judgment in **any** state **or** federal court litigation, arbitration, **or** mediation that was either initiated since January 1, 2009, **or** is currently pending in which **you** are, **or any** affiliated **person or** entity is, named as a defendant.
45. **All documents** that constitute, transcribe, describe, record, **relate to or** memorialize: a subpoena, civil investigative demand, warrant, administrative subpoena, letter request, order, **or any** other form of investigative **or** discovery requests **or** demands from **any**

civil **or** criminal law enforcement agency **relating to you or your** actions, operations, policies, procedures **or** practices.

46. **All documents relating to** telemarketing efforts **you** used to recruit **or** enroll prospective students, including but not limited to **all forms** of **any** script, instruction, guideline, procedure, application agreements **or** other materials the **company** has used to solicit consumers for the **company** by telephone, in response to incoming telephone calls, **or** online.
47. **All contracts you** have with **any lead generation company**.
48. **Documents** sufficient to show the organizational structure of **your** departments **or** divisions responsible for financial aid services, financial aid counseling, private loans, financial compliance, career placement, **advertising/marketing, and advertising** substantiation.
49. **All documents relating to the company's** compensation structure for **any** category of employee paid on a full **or** partial commission basis.
50. **All communications** that **discuss your** cohort default rates.
51. **All forms** of **any** script, instruction, guideline, procedure, contract, authorization, application agreements, **or** other materials the **company** has used for its Educard program **or** to obtain student authorization to originate a loan **or** for the payment of **any** loan, fee, **or** other cost associated with **any academic programs or** services offered by the **company**.
52. **All documents relating to the company's** policies, procedures, **or** practices that the **company** created **or** followed to ensure that **you** derive at least 10% of school revenue from non-Title IV funds.
53. **Documents** sufficient to show for each year **or** academic term the following:
 - a. The number of **DeVry** students who received scholarships;
 - b. The names of **DeVry** students who received **any** scholarship;
 - c. The amount of scholarship money that was awarded to **DeVry** students;
 - d. The number of **DeVry** students who received **any** grant money;
 - d. The amount of grant money that was awarded to **DeVry** students;
 - e. The names of **DeVry** students who received **any** grant money;
 - f. The amount of grant money that was awarded to **DeVry** students;
 - g. The **identity of or** names of different scholarship programs **or** grant programs that the **company** funded for the benefit of **DeVry** students; **and**
 - h. For **each** special **or** additional fee assessed to students who receive grants **or** scholarships from **you or any third party, the total amount of such fees** assessed.

54. **All documents relating to** the “payscale.com” study referenced on **your** website at www.devry.edu/why-devry/career-outcomes.html (see Exhibit A).
55. **All documents relating to any** other studies conducted by **payscale.com** for **you**.
56. **Documents** sufficient to describe **all** efforts by **you** to maintain **or** verify that **you** are maintaining the physical, administrative, **or** technical security measures that are responsive to Interrogatory Specification No. 61(d), including but not limited to:
 - a. **Any** written procedure(s) **or** schedule(s) that **you or your** employees follow;
 - b. **Any** written record of relevant training that **you** provide to employees;
 - c. A copy of **each** materially different contract between **you and any** third party who is permitted by **you** to access **personal information** responsive to Interrogatory Specification No. 61(a); **and**
 - d. A copy of **any** assessment, audit, review, **or** test responsive to Interrogatory Specification No. 61(d)(ii).
57. A copy of **each** different **ad or** other statement (e.g., privacy policy, terms of service) **you** have disseminated **or** caused to be disseminated **relating to** the privacy **or** security of **personal information** that is responsive to Interrogatory Specification No. 61(d).
58. **All documents** reviewed, consulted, **or** referred to in preparing responses to the interrogatories listed in this **CID**.

IV. SPECIFICATIONS FOR INTERROGATORY RESPONSES

Unless otherwise specified, respond to the interrogatories below for the applicable time period as set forth in Instruction II.C., above.

1. State the following information for the **company**:
 - a. Its full legal name **and all** other names under which it has done business;
 - b. The mailing address, street address, **and** telephone number of its headquarters;
 - c. The date **and** state(s) in which it is incorporated;
 - d. The names **and** titles of **all** its officers, directors, principal stockholders **and** owners;
 - e. The names **and** percentages of ownership of **all persons or** entities holding five percent **or** more ownership in it;
 - f. The names, addresses, officers, directors, owners, **and** states of incorporation of **any** parent, subsidiary, affiliate **company, or** division;
 - g. The names **and** addresses of **all** schools operated by the **company** in the United States;
 - h. The accreditations held by **each** school run by the **company and** the dates they were first obtained; **and**
 - i. The address(es) of **any** parent **company or companies and** the relationship of **each** parent to the **company**.

2. **Identify and** provide the following the full name **and** URL for (a) **each** website owned, operated **or** controlled by **or** on behalf of the **company or** that is used by the **company and which** describes, discusses, promotes, advertises, **or** sells the **company's academic programs**; (b) **all** websites on which **any person** has published **or** placed **any** an **advertisement related to the company**; **and** (c) **any** website that is owned, operated, **or** controlled by **any person** on **your** behalf.

3. For **each advertisement and promotional material** produced in response to Document Specification No. 1, state the beginning **and** ending dates of dissemination, **and** the dates, times, **and** locations the **ads** were disseminated. For print **ads and** press releases, **identify every** publication, date, **and** community of dissemination; for television **or** radio **ads**, provide **every** network, system **or** station, date, **and** community of dissemination; for **all** other materials, provide sufficient information to permit a determination of how many items were disseminated, when, where, **and** to whom.

4. **Identify all** individuals at the **company**, including both current **and** former **employees**, with knowledge about the creation **and** dissemination of the **advertisements** produced in response to Document Specification No. 1 above. For former employees, provide the last known contact information.

5. **Identify all persons**, including but not limited to **any advertising** agency, that may possess, **or** have otherwise maintained a copy of, **any documents** that **refer or relate to any website or** Web page that **DeVry** disseminated, including but not limited to **any** edits **or** modifications to **any website or** Web page (*e.g.*, edits reflected in **any** log file), that was **or** is accessible **and** directed to potential **or** existing **DeVry** students.

6. **Identify all persons**, including but not limited to current **and** former employees, independent contractors, **advertising** agencies, website developers **or** operators, telemarketing firms, marketing firms, public relations firms, **and** production companies, who have participated in **any** way in the development, **advertising**, marketing **or** promotion of **DeVry**, including press releases, newsletters, **or** websites. Include in **your** response a brief description of the services that **each** individual **and** **company** has provided. For former employees, provide the last known contact information.

7. **Identify all persons**, including but not limited to current **and** former employees, independent contractors, advertising agencies, research **or** marketing firms, laboratories, **and** public relations firms, who have participated in **or** contributed to the development **or** review of substantiation for **any** claims **or** representations made in the **advertisements or promotional materials** requested in Document Specification No. 1. **Your** response should include, but not be limited to, **all** experts, including survey companies, economists, accountants, researchers, attorneys, anyone referred to in **your advertising**, **and all** others consulted by **you or** upon whose advice, opinion, **or** expertise **you** have relied to substantiate the claims set forth in Document Specification No. 2 **or** 3. Include in **your** response a description of **each** person's relationship to **you**, including whether such **person** was **or** is **your** shareholder, employee, contractor, **or** agent; the services that

person provided **you**; whether such **person** was **or** is to be compensated by **you**, **and** if so, the terms **and** amount of such compensation. For former employees, provide the last known contact information.

8. Describe the process, procedures, guidelines, **or** standards that **you** followed during the applicable time period in determining whether **or** not to approve for dissemination **advertisements and promotional materials** for **DeVry**, **and identify** the **persons** responsible for formulating such procedures, guidelines, **or** standards, **and** the persons responsible for approving such **ads** prior to dissemination.
9. **Identify** any endorser of **DeVry** who appears **or** is referenced in **any advertisement and** describe **each** endorser's relationship to **you**, including whether such **person** was **or** is **your** shareholder, employee, contractor, **or** agent; whether such **person** was **or** is a **DeVry** graduate, whether such **person** was **or** is to be compensated by **you**, **and** if so, the terms **and** amount of such compensation. Where **any** endorsement has been made public under a fictitious **or** assumed name, **your** response should also include the **person's** real name, address, telephone number, **and all** other identifying information required under Definition P.
10. State the annual dollar amount **you** spent on the **advertising**, marketing, **or** other promotion of **DeVry** **and** provide a breakdown of expenditures for **each advertising** medium used.
11. State the annual dollar amount **you** spent to calculate the **company's** students' job placement rates. Describe in detail the nature of these expenditures.
12. State the annual dollar amount **you** spent to calculate the **company's** students' income levels. Describe in detail the nature of these expenditures.
13. State **your** annual gross sales revenues for **each academic program DeVry** sold in the United States. If **you** maintain financial data on a fiscal year schedule that differs from the calendar year, provide the sales revenues according to those fiscal years **and identify** the dates of the fiscal years.
14. State the total annual refunds disbursed **and** total annual number of refund requests for **any academic program** offered by the **company**.
15. **Identify** the following: (a) **all** individuals at the **company**, including current **and** former employees, with knowledge about the **company's** actual job placement rates **or** income levels for **DeVry** graduates; **and** (b) the **persons or** departments responsible for determining **and** verifying **your company's** actual job placement rates **and** income levels for **your** graduates. If the **persons or** departments have changed over time, provide information by year indicating the responsible people **and** departments. For former employees, provide the last known contact information.

16. **Identify and** describe: (a) **all** methods by which the **company** obtains, measures, analyzes, determines, **or** verifies: **DeVry's** reported placement rates; which jobs are considered to be "careers" in a **DeVry** graduate's "field of study"; which graduates are "actively seeking employment"; **and DeVry graduates'** reported income levels; **and** (b) **all** policies **and** guidelines created to determine whether **DeVry** graduates had jobs in their field within six months of graduation.
17. Describe how the **company**: (a) defines the terms "actively seeking," "employment," "careers," "in their field of study," **and** "within 6 months," as used in its **advertisements**; **and** (b) how it evaluates **and** verifies the information it receives concerning these categories.
18. **Identify all forms** that are sent to graduates that ask the graduate to provide **any** information about jobs that the graduate has had since graduating **or** income the graduate has earned. For **each** such **form**, (a) describe **and** provide a chronology of the process that is used to handle **and** review **forms** that graduates have returned to **DeVry**, including but not limited to a description of the files into which such **forms** are placed, the use of written guidelines **or** standard operating procedures, the names of the departments that receive the **forms**, **and** the titles of personnel charged with reviewing **and** evaluating the **forms**, **and** quality-assurance **or** control procedures that **DeVry** has used to ensure that its job-placement statistics are accurate, **and** (b) **identify all** people who, for the purpose of compiling placement statistics, have been responsible for reviewing **or** evaluating **forms or** other information **relating to** job placement that graduates have provided to **DeVry**. If anyone identified is a former employee, provide the last known contact information.
19. **Identify and** describe the manner in which **DeVry** determines **and** calculates the "Graduate Employment Statistics" set forth on the **company's** website www.devry.edu (*see* Exhibit B), including the following categories:
 - a. Graduates who actively pursued and obtained employment and those already employed in education-related careers within 180 days of graduation;
 - b. Average reported annual compensation;
 - c. Graduates;
 - d. Graduates eligible for career assistance;
 - e. Graduates who actively pursued employment for up to 180 days and those who were already employed; and
 - f. Graduates employed in education-related positions within 180 days of graduation.
20. **Identify and** describe how the **company** determined that "In 2012, 90% of DeVry University graduates actively seeking employment had careers in their field within six months of graduation" (*see* Exhibit A, copied from www.devry.edu/why-devry/career-outcomes.html);

21. **Identify and** describe how the **company** determined that “Each year thousands of graduates find themselves exactly where they want to be - employed in their field of study” (*see* Exhibit A);
22. **Identify and** describe how **DeVry** obtained its 2011 **and** 2012 job placement figures (as set forth in Exhibit B), including a description of the process used by **DeVry** to obtain information from graduates.
23. **Identify and** describe how the **company** determines what jobs are in a graduate’s “field of study” (as that phrase is used in Exhibit B).
24. **Identify and** describe how the **company** determines which grads are “not actively seeking employment as determined by DeVry University Career Services” (as that phrase is used in Exhibit B), **and** describe how the **company** defines the phrase “not actively seeking employment.”
25. **Identify and** describe the **company’s** substantiation for claims on the **company’s** website that, “Over the last 10 years, DeVry University graduates have worked at 95 of the Fortune 100 companies included in the 2012 Fortune 500 list” (*see* Exhibit A).
26. **Identify and** describe how the **company** determines which students have “self-reported to DeVry University Career Services” (as that phrase is used in Exhibit A), including **any** steps taken to solicit responses from students concerning job placement rates set forth in the **company’s** television **advertisements**, including but not limited to the “This is the Guy Graduating” advertisement and the “Career Catalyst Scholarship” advertisement (DeVry University TV Spot, This is the Guy Graduating, *available at* <http://www.ispot.tv/ad/7qSJ/devry-university-this-is-the-guy-graduating>; DeVry University TV Spot, Career Catalyst Scholarship, *available at* <http://www.ispot.tv/ad/7t9d/devry-university-career-catalyst-scholarship>). If such practices have changed over time, describe the manner in which they have changed.
27. For **each** year between 2009 **and** 2013: (a) state the number of students who graduated from **DeVry each** year; (b) **identify** the students who graduated from **DeVry** in that year whom **DeVry** categorized (for purposes of its published placement statistics) as having careers “in their field” within six months after graduating from **DeVry**; (c) state the criteria that **you** used to determine whether a graduate had a career in his field; (d) for the students who had careers “in their field” within six months after graduating from **DeVry**, state the number who had jobs that they held before they started attending **DeVry**; (e) for the students who had “careers in their field” within six months after graduating from **DeVry**, state the number who had jobs “in their field” before they started attending **DeVry**; (f) for the students who had “careers in their field” within six months after graduating from **DeVry**, state the number who had the same jobs “in their field” before they started attending **DeVry** that they had at the time **DeVry** considered them as having jobs “in their field” for purposes of determining placement rates; **and** (g) of the graduates whom **you** categorized as having careers “in their field” within six months after graduating from **DeVry**, state the number of graduates **you** placed in that category

because the graduate had (**or** reported having) a job that was: less than full time; **or** a temporary job **and identify** the number of days a student must work in a job post-graduation to qualify as having a career in their field for purposes of DeVry's reported placement rates.

28. **Identify and** describe **any** minimum placement rates the **company** has been required to meet by **any** of its accreditors, shareholders, **any** third party, **or any** governmental agencies **or** entities.
29. **Identify each** campus the **company** closed **or** sold which had a placement rate below 90% prior to the closure **or** sale of the campus **and identify and** describe the reason the **company** closed **or** sold that campus.
30. **Identify** the 95 Fortune 100 companies that offered employment to **your** graduates (*see* Exhibit A), **and identify** the names **and** number of graduates employed by **each** of those companies **and** the year of their employment.
31. Describe **and identify** representations **you** made to prospective students about placement rates, the ability to get students jobs, anticipated income level, the length of time it will take to earn a degree **and** the total anticipated cost of their education.
32. **Identify and** describe **all** tests, surveys, reports, **or** studies conducted by **or** for the **company** that **refer or relate to any advertisement** considered, tested, **or** disseminated by the **company** during the applicable time period regarding the **company's** alleged placement rates **or** graduate income levels.
33. For **each** of **your** locations, describe **any** policies, guidance **or** instruction **you** provide to employees **relating to** the following: recruitment of prospective students; enrollment of students; state financial aid; federal financial aid; private loans; contractual repayment relief programs; default management; responding to audits, **and** gathering career placement statistics.
34. By year, state the names **and** number of the **company's** employees who were terminated for failure to comply with **any** of the policies, guidance **or** instruction **relating to** the following: the recruitment of prospective students; analysis of **or** representations regarding student incomes levels, placement rates **or** other information; state financial aid; federal financial aid; private loans; contractual repayment relief programs; **and** default management, reduction **or** prevention.
35. Describe **and identify**: (a) **all** policies, procedures, **and** standards DeVry uses **or** has used to determine which students qualify for the scholarships to which DeVry refers in **any advertisements** (*e.g.*, your "Career Catalyst Scholarship" **advertisement**, available at <http://www.ispot.tv/ad/7t9d/devry-university-career-catalyst-scholarship>); (b) how DeVry determines how much **each** of those students receives in scholarship money; **and** (c) how DeVry determines what if **any** impact receipt of a scholarship will have on **any** other financial aid that a scholarship recipient has **or** will receive.

36. Describe **any** conditions **or** restrictions on the use of **any** scholarships offered by **DeVry**, **and any** fees **or** charges assessed to scholarship recipients, including but not limited to a description of **any** fees **Devry** imposes on, **or** requests for reimbursement that **Devry** issues to, scholarship recipients who receive other financial aid.
37. Describe the **company's** program by which it offers private loans to students, including a description of the typical **or** average interest rates charged to students **and** the terms of those loan offers.
38. **Identify all** of **your** current **or** former **executive officers** who have responsibilities **or** duties **relating to**: student recruitment; student enrollment; student admissions; student financial aid services; private loan programs; student financial aid counseling; placement figures; **or** marketing of **academic programs**. For former employees, provide the last known contact information.
39. Describe **your** policies, procedures, practices, processes **and** timing for informing students about the following: (1) the balance due for **each** academic session (*i.e.* **each** eight week session **and each** semester); (2) the amount, number **and** balance of student loans that students take out during **each** academic session; (3) the remaining balance due after the student loans **and** other financial aid have been applied to the account; (4) **any** loans due from students to the **company**, including the terms of such loans, during **any** academic session; **or** (5) **any** fees charged to students through **any** Educard account **or any** similar type of account.
40. Describe **your** policies **and** procedures for determining when a student will be charged for a course, including but not limited to situations where a student seeks to drop a class **or** where a member of the military is called away to active duty while enrolled, **and** how **and** when those policies **and** procedures are communicated to **your** students.
41. **Identify** the location of **each call center** you own **or** operate.
42. **Identify all** contracts you have with **any lead generation company**, **or** contracts with **persons** (other than natural **persons**) to make, receive **or** respond to telephone calls on **your** behalf.
43. Describe **all** policies, procedures **or** protocols you have **relating to** maintaining copies of emails sent **or** received by: (a) **any** employee whose primary responsibilities **relate to** admissions, career placement, advertising, or marketing; **or** (b) **or any executive officer**.
44. Describe **and identify the following**: (a) **each mystery shopper program** operated by **you**; (b) **any** violations **or** breaches of **your** rules, policies, **and** procedures found by **any** **mystery shopper program**; **and** (c) **any** corrective action **or** actions taken by **you** as a result of the findings of **any mystery shopper program**.
45. **Identify all persons** you have paid **or** otherwise compensated to make **any** post, **any** addition, **or any** other form of submission to **any** social network website (including

without limitation Facebook, Twitter, LinkedIn, MySpace, **and** Google Plus), business rating website (including www.bbb.org), business review website (including without limitation Yelp) **or** Wikipedia.

46. **Identify all** emails **and** other **documents** that **refer to** the lawsuit entitled *California v. Heald College, LLC, et. al.* (CGC-13-534793, Superior Court of the State of California).
47. For **each** year since 2008, out of the number of the students who enrolled in a bachelor's degree program that year, state the number of students who subsequently withdrew (a) within one year of enrolling; (b) within two years of enrolling; **or** (c) before completing their degree program.
48. For **each** year since 2008, out of the number of the students who enrolled in an associate's degree program that year, state the number of students who subsequently withdrew (a) within one year of enrolling; (b) within two years of enrolling; **and** (c) before completing their degree program.
49. For **each** year since 2008, out of the number of the students who enrolled in **any academic program** other than a bachelor's degree **or** associate's degree program that year, state the number of students who subsequently withdrew (a) within one year of enrolling; (b) within two years of enrolling; **and** (c) before completing their degree program.
50. For **each** year since 2008, out of the number of students who graduated from **DeVry**, **identify** the difference between the incomes earned by students prior to attending **DeVry** compared with the income earned by those same students within six months after graduating from **DeVry**.
51. Without respect to the applicable time period forth in Instruction II.C, state the total number of students who enrolled in **DeVry** since 1975 **and** the total number of students who graduated from **DeVry** between 1975 **and** 2012.
52. State the names of **all** associate degree programs (*e.g.*, Accounting) **and** bachelor's degree programs (*e.g.*, Business Administration) offered by **DeVry** for which degrees were available for **each** of the following graduating class years: 2010, 2011, 2012, **and** 2013. For **any** program that was available for the graduating class of 2011 or 2012 but which was not included among the degree programs listed in the "Graduate Employment Statistics" for 2011 **or** 2012 (*see* Exhibit B), explain why such program was not included.
53. On the website www.distancelearning.com, **you** state, "The faculty teaching DeVry's distance learning courses are leaders in their field with degrees and advanced training. They have extensive experience along with a passion for educating. Students will experience the same valuable education online that they would in a traditional classroom setting." (www.distancelearning.com/devry-university/). State the basis for the **company's** statement that "The faculty teaching DeVry's distance learning courses are leaders in their field with degrees and advanced training."

54. In **DeVry's** 2010 10-K report at pages 17-18, **DeVry** states, "In September 2009, we launched a highly integrated brand initiative that further refines our focus on DeVry University's 30-plus years of graduate employment success, while emphasizing DeVry University as an accredited, highly-respected academic institution. The refined brand campaign is grounded in ongoing in-depth consumer, marketplace and brand research, and leverages a number of channels, including broadcast, print and Internet advertising, public relations, and social media, as well as local marketing efforts." **Identify and** describe the "ongoing in-depth consumer, marketplace and brand research" that is referenced at page 17 of **DeVry's** 2010 10-K **and** the basis for **DeVry's** claim of 30 years of graduate employment success.
55. In **your** 2009 10-K filing at page 29, **you** state that "DeVry has worked to reduce the default rate by implementing student counseling and additional collection efforts and retaining outside loan service agencies." **Identify and** describe how "DeVry has worked to reduce the default rate by implementing student counseling and additional collection efforts and retaining outside loan service agencies."
56. Describe **and identify** the specific work **you** have done with "top companies like Microsoft, Adobe, Cisco, and HP to create curriculum" so **your** graduates are ready to take on their careers, including a description of the "curriculum" referred to in this statement. (**DeVry** Facebook page.)
57. Describe the **company's** policies, procedure **or** practice for recording, tracking, responding to, **or** summarizing **any** consumer complaints.
58. For **each** consumer who has complained to **you**, **or** to **any** third party that has forwarded such complaints to **you**, state the date of **and** reason for the complaint **and your** response, if **any**.
59. **Identify all** law enforcement actions, lawsuits, **or** legal proceedings filed against, **or** otherwise involving **you**, including arbitrations **or** mediations, which **refer or relate to** the **company**. For **each** such matter, provide the names of **all** parties **and** their counsel, the jurisdiction, the date filed, **and** the current status **or** disposition of the matter.
60. Describe in detail how the **company** collects, maintains, processes, secures, stores, transmits, destroys, **or** otherwise handles **personal information** regarding **Devry** students **and** prospective students who apply for financial aid, loans, **or** grants. As part of **your** description:
 - a. **Identify and** describe **each** type of **personal information** that **you** collect, maintain, record, transmit, **or** enable **your** students, prospective students, **or** other third parties to transmit **or** otherwise provide in connection with **any** application for financial aid, loans, **or** grants;

- b. Describe **each** means by which **personal information** responsive to Interrogatory Specification No. 61(a) may be transmitted (*e.g.*, by email, by facsimile) to **or** within the **company and all** steps the **company** takes to secure such transmissions;
 - c. **Identify all** parties, internal **or** external, who may use **or** access the **personal information** (*i.e.*, **each** employee, service provider, contractor, agent, **or** other **person or** entity, except that **you** do not need to **identify** a consumer who may use **or** access information regarding him- **or** herself) **and** give a step-by-step explanation of **all** means by which such use **or** access may be carried out; and
 - d. Describe in detail the **company's** physical, administrative, **or** technical security measures related to safeguarding **personal information** that is responsive to Interrogatory Specification No. 61(a), including but not limited to:
 - i. **All** steps to prevent unauthorized access to such information;
 - ii. **Any** assessment, audit, review, **or** test undertaken to identify the risks to the security **or** such information, together with the results; and
 - iii. **All** employee training regarding the handling **and** security of such information, including the specific categories of employees who receive such training, the time at which they receive it (*e.g.*, at time of hire, annually, as needed), the length of the training, the topics covered, **and** how the employee understanding is assessed.
62. Describe in detail **each** incident of which **you** are aware in which **personal information** responsive to Interrogatory Specification No. 61(a) was **or** may have been shared **or** accessed without authorization (an "intrusion"), **and**, for **each** such incident, identify when **and** how **you** first learned about it, the details of how **and** when it occurred, the precise **personal information** involved, **any** steps **you** took to investigate **or** respond to it, **and all** persons with knowledge about it.
63. State whether **DeVry** (a) informs any students or prospective students that the tuition for any class is not, **or** might not be, covered for payment under the GI bill, or (b) informs any students or prospective students of any other restrictions **or** conditions for receiving any benefits under the GI bill. If **your** answer to either subpart is "yes," please describe the information that DeVry provides and **identify** any forms that DeVry uses to communicate the information.
64. If, for **any** specification for **documents**, things, **or** Interrogatory responses, **documents** that would be responsive to this **CID** were destroyed, mislaid, transferred, deleted, altered, **or** overwritten: (a) **describe** in detail the **document**; (b) state the date such **document** was destroyed, mislaid, transferred, deleted, altered, **or** overwritten; (c) **describe** the circumstance under which such **document** was destroyed, mislaid, transferred, deleted, altered, **or** overwritten; **and** (d) **identify** the **person** authorizing such action.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY

Pursuant to 28 U.S.C. § 1746

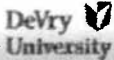

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:
2. I have authority to certify the authenticity of the records produced by DeVry Inc. and attached hereto.
3. The documents produced and attached hereto by DeVry Inc. are originals or true copies of records of regularly conducted activity that:
 - a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;
 - b) Were kept in the course of the regularly conducted activity of DeVry Inc.; and
 - c) Were made by the regularly conducted activity as a regular practice of DeVry Inc.

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

Executed on _____, 20__.

Signature

EXHIBIT A





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Why DeVry

"It's not just about a job for my student... it's about their career."
- Terrell Kirkwood, Career Advisor

Outstanding CAREER OUTCOMES

 **Outstanding CAREER OUTCOMES**
 **CARE AND ATTENTION**
 **REAL-WORLD DEGREES**
 **CONVENIENCE**


Prepare for your future career

At DeVry, our number one goal is to prepare our students for a lifetime of success in their field. We think our students' success speaks for itself.

Excellent employment results

Nobody wants to go to college and just be a number...unless they're numbers like these. Each year, thousands of our grads find themselves right where they want to be - employed in their fields of study.

IN 2012, **90%** of DeVry University GRADS actively seeking employment **HAD CAREERS** in their field within six months of graduation.

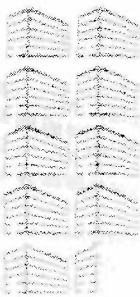


Our grads work for the biggest names in business

What sets DeVry University apart is that so many of our graduates have worked for Fortune 100 companies. The reason just might be that our curriculum is designed with input from Fortune 100 companies, so our graduates enter the workforce with the skills that they can use from day one.

OVER THE LAST 10 YEARS
DeVry University graduates
 HAVE WORKED AT

95 of the **FORTUNE 100**
COMPANIES
 INCLUDED IN THE 2012 FORTUNE 500 LIST



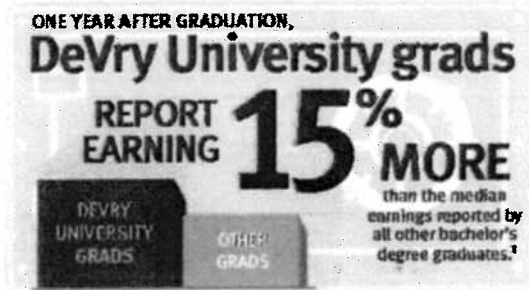
An education that pays

Resource Center
 Get personalized information
 I am a...

 Try the DeVry Virtual Advisor

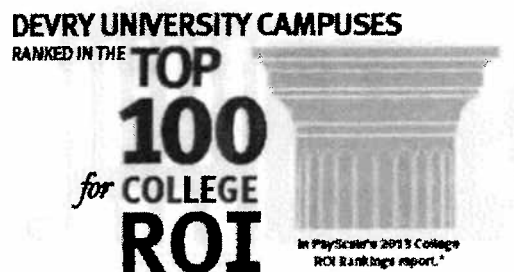
 Show More Tools | + |

Not only can a degree from DeVry University prepare you for a lifetime of career success, it can also increase your earning potential right from the start.



A top return on your investment

We couldn't be more proud of the success our graduates have in their careers. We were honored that three DeVry University campuses ranked in the top 100 of PayScale's 2013 College ROI Rankings report.



* DeVry University's North Brunswick, N.J. (74); Westminster, CO (75); and Columbus, OH (79) campuses were each ranked among the top 100 out of 1,060 schools evaluated. For information on the methodology of the PayScale 2013 College ROI Rankings report, visit <http://www.payscale.com/data-packages/college-roi-2013/methodology>.

Experience the DeVry difference
Join the 90%

Request Info >

Apply Online >

or call now
866-338-7934

¹ Figure based on 2012 graduates self-reporting data to DeVry University Career Services who were employed at graduation or actively seeking employment in their field after graduation. Does not include graduates who were not actively seeking employment, as determined by DeVry University Career Services, or who did not report data on employment status to DeVry University Career Services.

² DeVry University graduates from Feb 2002 to Oct 2011 in the active job market. Active job market includes those employed prior to graduation. Employment information is self-reported to DeVry by its graduates for the respective year of the Fortune 500 ranking and collected 6 months after each graduation. Fortune 500 ranking, 2012. Methodology used to rank companies can be found at money.cnn.com.

³ Based on PayScale.com study commissioned by DeVry University. Data for the study was collected in 2012 and compared reported earnings for 2010 graduates. 73,309 bachelor's degree graduates reported earnings including 620 DeVry graduates. Self-reported information may not reflect actual earnings and may not be representative of earnings of individuals that do not supply information. Results may not be statistically significant. Comparative data includes private not-for-profit schools, private for-profit schools, and public schools.

For comprehensive consumer information, visit devry.edu/studentconsumernfo

Outstanding Career Outcomes and Employment Results | DeVry

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DeVry University operates as DeVry Institute of Technology in Calgary, Alberta. In New York, DeVry University operates as DeVry College of New York.

DeVry University is accredited by The Higher Learning Commission of the North Central Association of Colleges and Schools, www.ncahls.org.

Certified to operate by the State Council of Higher Education for Virginia. DeVry University is authorized for operation by the THEC.

EXHIBIT B



DeVry University Graduate Employment Statistics

2012 Career Services results by degree program Combined statistics for students who graduated from the February 2012, June 2012, October 2012 and December 2012 classes.	Graduates who actively pursued employment and obtained employment within 180 days of graduation	Average reported annual compensation ¹	Graduates	Graduates eligible for career assistance ²	Graduates who actively pursued employment for up to 180 days and those who were already employed ³	Graduates employed in education-related positions within 180 days of graduation
ASSOCIATE DEGREE PROGRAM						
Accounting	90%	\$33,892	234	144	124	112
Neurodiagnostic Technology	100%	\$37,960	7	7	7	7
Electronics & Computer Technology	91%	\$37,395	378	246	215	195
Health Information Technology	79%	\$31,847	1018	619	522	411
Network Systems Administration	87%	\$39,937	797	437	377	329
Web Graphic Design	64%	\$33,327	403	145	88	56
Associate Degree Total	83%	\$35,436	2837	1598	1333	1110
BACHELOR'S DEGREE PROGRAM						
Biomedical Engineering Technology	90%	\$45,281	110	98	88	79
Business Administration	92%	\$38,558	1911	1536	1430	1318
Clinical Laboratory Science	100%	\$46,176	26	23	21	21
Computer Engineering Technology	87%	\$44,421	119	102	93	81
Computer Information Systems	89%	\$44,651	901	697	633	562
Electronics Engineering Technology	93%	\$48,208	318	282	269	249
Game & Simulation Programming	69%	\$38,688	362	248	194	133
Justice Administration	100%	\$26,000	4	3	2	2
Management	96%	\$42,353	74	52	48	46
Multimedia Design & Development	84%	\$32,251	196	127	92	77
Network & Communications Management	93%	\$44,891	660	525	494	461
Technical Management	94%	\$48,101	4620	3614	3413	3196
Bachelor's Degree Total	92%	\$45,031	9301	7307	6777	6225

¹Includes base salary and any additional taxable compensation of those graduates who chose to disclose this information. Graduates employed in education-related positions prior to graduation generally earn more than graduates who accept new employment after graduation. All compensation is reported in U.S. dollars.

²Excludes graduates continuing their education, those employed in non-education related positions and not seeking education related positions, foreign graduates legally ineligible to work in the United States/Canada and those unable to accept career advising assistance because of circumstances such as military deployment, national service (Peace Corps, Teach for America, etc.), participation in a religious mission, incarceration, critical illness or death.

³Excludes graduates who actively pursued employment for less than 180 days and did not become employed. Statistics for graduates of new programs that do not yet have graduates will be available approximately six months after the first classes graduate. Information presented is based on graduate provided data. Also excludes programs no longer accepting applicants.

For comprehensive consumer information, visit devry.edu/studentconsumerinfo

In New York, DeVry University operates as DeVry College of New York. DeVry University operates as DeVry Institute of Technology in Calgary, Alberta. Program availability, and course requirements and availability, vary by location. Some courses may be available online only. Refer to the current academic catalog for more detailed information. DeVry is certified to operate by the State Council of Higher Education for Virginia, AC0060. DeVry University is authorized for operation by the THEC, www.state.tn.us/thec. Nashville Campus: 3343 Perimeter Hill Dr., Nashville, TN 37211. 55-500034 7/13.

Home Office

3005 Highland Parkway | Downers Grove, IL 60515 | 800.733.3879

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We're always here for you.

Career Services professionals across the DeVry system work diligently to partner with graduates to attain positions in their career fields. Although DeVry cannot guarantee employment, we're dedicated to helping guide and motivate our students and graduates through the career process. We work with them on career planning, job interviewing and resumé preparation. Students' career efforts are also supported by an employer database containing information on national and local companies, and virtual and onsite Career Fairs held periodically to enable our students to meet and network with recruiters of DeVry graduates. As a student at DeVry, you'll have the opportunity to partner with one of the most dedicated career services teams in education.

DeVry 
University

devry.edu

2011 Career Services Results by degree program

Combined statistics for students
who graduated from the
February 2011, June 2011
and October 2011 classes.

ASSOCIATE DEGREE PROGRAM

	Graduates who actively pursued and secured employment and those who reported education-related careers within 180 days of graduation ¹	Average reported annual compensation ²	Graduates ³	Graduates eligible for career assistance ³	Graduates who actively pursued employment for up to 180 days and those who were already employed ⁴	Graduates employed in education-related positions within 180 days of graduation
Accounting	74%	\$33,287	159	97	88	65
Electroneurodiagnostic Technology <i>(renamed Neurodiagnostic Technology November 9, 2012)</i>	100%	\$35,391	9	8	8	8
Electronics & Computer Technology	82%	\$37,043	336	218	201	165
Health Information Technology	69%	\$33,321	849	523	460	318
Network Systems Administration	81%	\$37,502	696	407	373	303
Web Graphic Design	52%	\$31,739	412	140	110	57
ASSOCIATE TOTAL	74%	\$35,327	2,461	1,393	1,240	916

BACHELOR'S DEGREE PROGRAM

Biomedical Engineering Technology ¹	81%	\$43,568	113	101	94	76
Business Administration	91%	\$38,180	1,703	1,334	1,269	1,150
Clinical Laboratory Science	100%	\$44,075	15	14	14	14
Computer Engineering Technology	86%	\$40,834	122	97	91	78
Computer Information Systems	85%	\$44,178	806	613	570	484
Electronics Engineering Technology	91%	\$44,386	285	240	232	211
Game & Simulation Programming	61%	\$36,096	439	298	246	149
Management	100%	\$29,062	9	5	5	5
Multimedia Design & Development	82%	\$29,208	66	45	40	33
Network & Communications Management	90%	\$43,838	543	433	407	366
Technical Management	90%	\$47,001	4,099	3,176	3,033	2,726
BACHELOR'S TOTAL	88%	\$43,849	8,200	6,356	6,001	5,292

Graduate Employment Rates

Even in today's challenging economic environment, a large percentage of 2011 DeVry University graduates in the active job market were either employed in their fields before graduating or found jobs within six months of graduation. For those who earned associate degrees, the employment rate was 74 percent; the rate was 88 percent for those who earned bachelor's degrees⁵.

¹ Biomedical Technology in New York

² Data includes base salary and any additional taxable compensation of those graduates who chose to disclose this information. Graduates employed in education-related positions prior to graduation generally earn more than graduates who accept new employment after graduation. All compensation is reported in U.S. dollars.

³ Data excludes graduates continuing their education, foreign graduates legally ineligible to work in the United States/Canada and those unable to accept career advising assistance because of circumstances such as military deployment, national service (Peace Corps, Teach for America, etc.), participation in a religious mission, incarceration, critical illness or death.

⁴ Data excludes graduates who actively pursued employment for less than 180 days and did not become employed. Statistics for graduates of new programs that do not yet have graduates will be available approximately six months after the first classes graduate. Information presented is based on graduate-provided data. This also includes programs no longer accepting applicants.

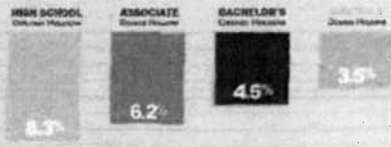
⁵ Combined statistics for February, June and October 2011 graduating classes systemwide

EXHIBIT C

A COLLEGE DEGREE MAKES GOOD \$ENSE

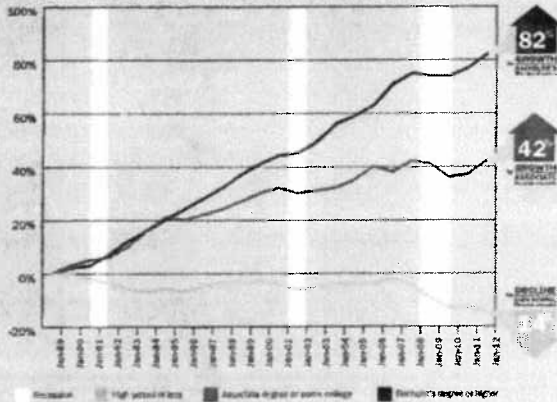
The rising cost of college in America is still making headlines, but the facts show that postsecondary education remains a wise investment that pays off in significant lifetime gains like better employment prospects and higher paying jobs. Additionally, graduates of DeVry University fair better in the job landscape than their like-degreed colleagues.

COLLEGE DEGREES CAN MEAN LOWER UNEMPLOYMENT:¹



"Nearly 4 out of every 5 jobs destroyed by the recession were held by workers with a high school diploma or less."²

COLLEGE DEGREES CAN MEAN BETTER EMPLOYMENT GROWTH:³



COLLEGE DEGREES CAN MEAN HIGHER EARNING POWER FOR LIFE:⁴

Those with bachelor's degrees are projected to earn almost **\$1 million more** in their lifetime than those with only high school diplomas.

LIFETIME EARNINGS: High School Diploma **\$1,304,000** vs. Bachelor's Degree **\$2,268,000**

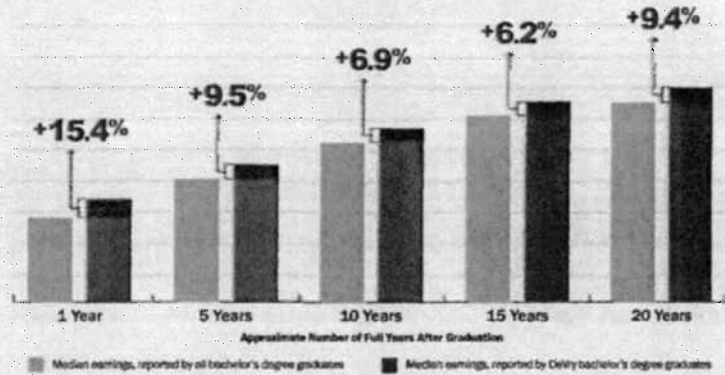


HIGH SCHOOL VS. BACHELOR'S DEGREE

Only **14%** of people with a high school diploma can expect to earn the same amount or more as the median earnings of someone with a bachelor's degree.

Median net worth of people approaching retirement with a bachelor's degree is **4x higher** than those with only a high school diploma.

DEVRY UNIVERSITY BACHELOR'S DEGREE GRADUATES REPORT THAT THEY EARN MORE OVER OTHER BACHELOR'S DEGREE HOLDERS:



DEVRY UNIVERSITY BACHELOR'S DEGREE GRADUATES REPORT HIGHER EARNINGS OVER OTHER BACHELOR'S DEGREE GRADUATES: (graduates from 2002-2011)



10
DeVry University graduates from the last 10 years have worked at over **95** of the current Fortune 100 companies.⁵

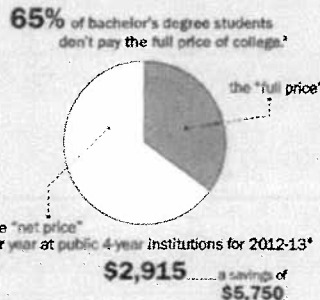
15
One year after graduation, DeVry Alumni report that they earn about **15%** more than the median earnings reported by all bachelor's degree graduates.

20
DeVry University graduates nearly double their reported salary 20 years after graduation.

PayScale.com Bachelor's Degree Graduate Study:

Based on PayScale.com study commissioned by DeVry University and completed June 2012 on the median self-reported earnings of DeVry University graduates and PayScale.com data regarding the median self-reported earnings of graduates of all bachelor's degree-granting schools for which data was collected. Data was collected between April 1, 2010 to April 1, 2012. All campuses of DeVry University are included. Of the DeVry University graduates reporting earnings to PayScale.com, 454 graduated in 2011 (0 years after graduation group), 620 graduated in 2010 (Approx. 1 year grouping), 1,192 graduated between 2003 and 2007 (Approx. 5 years grouping), 570 graduated between 1998 and 2002 (Approx. 10 years grouping), 253 graduated between 1993 and 1997 (Approx. 15 years grouping), and 322 graduated between 1983 and 1992 (Approx. 20 years grouping). DeVry University graduates from 2002 to 2011 who reported earnings above a given amount totaled 1,630 (\$50,000 or more), 1,069 (\$60,000 or more), and 657 (\$70,000 or more). Reported earnings of DeVry University graduates from the Approx. 20 years grouping were 1.9 times higher than those from the 0 years after graduation group. Self-reported information may not reflect actual earnings of individuals participating in survey and may not be representative of graduates who decided not to self-report information. Comparison results may not be statistically significant. Comparative data includes private not-for-profit schools, private for-profit schools, and public schools.

TAKING INTO ACCOUNT THE COST OF THE AVERAGE BACHELOR'S DEGREE:



About two-thirds of full-time students pay for college with the assistance of grant aid, and some of the remaining two-third receive federal tax credits and deductions to help cover expenses!⁸

The average debt at graduation for bachelor's degree recipients in 2011 was about **\$27,000** or the cost of a new car.⁹
just over **\$6,000** per year

Only **1.5%** of all undergraduate and graduate students from 2007-2008 graduated with six-figure loan debt.¹⁰

More than **HALF** of these students attended the most selective colleges and universities. **10%** of these students were undergrads. **90%** of these students were graduate and professional students earning medical, law and doctorate degrees.

Sources: 1. U.S. Department of Labor (2013), January 28; Employment Projections, Retrieved February 22, 2013, from Bureau of Labor Statistics: http://www.bls.gov/emp/ep_chart_001.htm. 2. Georgetown University Center on Education and the Workforce. The College Advantage: Weathering the Economic Storm. 3. Georgetown University Center on Education and the Workforce. The College Payoff: Education, Occupations and Lifetime Earnings. 4. Fortune 500 ranking, 2012. DeVry University graduates from Fall 2002 to Oct 2011 in the active job market. Active job market includes those employed prior to graduation. 5. Mark Karbowitz, Who Graduates College with Six-Figure Student Loan Debt?, August 1, 2012. 6. College Board Advocacy & Policy Center. Trends in College Pricing 2012. DeVry University is a subsidiary of DeVry Inc. ©2013 DeVry Educational Development Corp. All rights reserved.