

OF
PLAINTIFF(S) Commonwealth of Massachusetts **DEFENDANT(S)** Sullivan & Cogliano Training Centers

Type Plaintiff's Attorney name, Address, City/State/Zip Phone Number and BBO# Type Defendant's Attorney Name, Address, City/State/Zip Phone Number (If Known)

Jenny Wojewoda, Office of the Attorney General
 One Ashburton Place, 18th Floor
 Boston, Massachusetts 02108
 617-963-2547
 BBO# 674722

Steven E. Kramer, Esq.
 25 Walnut Street, Third Floor
 Wellesley, MA 02481
 781-237-2440

FILED
 COMMONWEALTH OF MASSACHUSETTS
 SUPERIOR COURT DEPT. OF THE TRIAL COURT
 PLYMOUTH COUNTY
 APR 3 2013
 TRACK
 TYPE OF ACTION AND TRACK DESIGNATION (See reverse side)
 CODE NO. TYPE OF ACTION (specify) IS THIS A JURY CASE?
 Yes No
E99 Misc Other (specify) - X track

The following is a full, itemized and detailed statement of the facts on which plaintiff relies to determine money damages. For this form, disregard double or treble damage claims; indicate single damages only.

TORT CLAIMS
 (Attach additional sheets as necessary)

A. Documented medical expenses to date:	
1. Total hospital expenses	\$ _____
2. Total doctor expenses	\$ _____
3. Total chiropractic expenses	\$ _____
4. Total physical therapy expenses	\$ _____
5. Total other expenses (describe)	\$ _____
	Subtotal
B. Documented lost wages and compensation to date	\$ _____
C. Documented property damages to date	\$ _____
D. Reasonably anticipated future medical expenses	\$ _____
E. Reasonably anticipated lost wages and compensation to date	\$ _____
F. Other documented items of damages (describe)	\$ _____
G. Brief description of plaintiff's injury, including nature and extent of injury (describe)	\$ _____
	Total \$ _____

CONTRACT CLAIMS
 (Attach additional sheets as necessary)
 Provide a detailed description of claim(s):

 TOTAL \$.....

PLEASE IDENTIFY, BY CASE NUMBER, NAME AND COUNTY, ANY RELATED ACTION PENDING IN THE SUPERIOR COURT DEPARTMENT

"I hereby certify that I have complied with the requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods."
 Signature of Attorney of Record _____ Date: April 3, 2013
 A.O.S.C. 3-2007

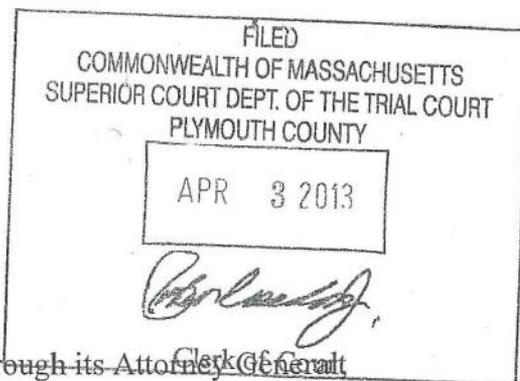
COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, ss.

SUPERIOR COURT
CIVIL ACTION NO. 13-0357B

_____)
COMMONWEALTH OF MASSACHUSETTS,)
)
Plaintiff,)
)
v.)
)
SULLIVAN & COGLIANO TRAINING)
CENTERS, INC.,)
)
Defendant.)
_____)

COMPLAINT



INTRODUCTION

1. The Commonwealth of Massachusetts, by and through its ~~Attorney General~~ Clerk General Martha Coakley, brings this enforcement action in the public interest pursuant to the Massachusetts Consumer Protection Act, G.L. c. 93A, § 4. The complaint seeks restitution, including the return of tuition and fee payments acquired by defendant Sullivan & Cogliano Training Centers, Inc. (S&C) from students induced by S&C's unfair or deceptive acts or practices to enroll in S&C's certificate programs, and civil penalties of \$5,000 per violation. The complaint also seeks injunctive relief to remedy, address, and prevent additional harm arising from S&C's unfair or deceptive acts or practices, together with the costs of investigating and prosecuting this action, including reasonable attorneys' fees.

2. S&C is a for-profit educational institution. From 2008 or earlier through the present, S&C deceived and misled the public and prospective students in order to persuade consumers to enroll in its educational programs and to provide tuition and fee monies to S&C. In public advertisements on buses and in other venues, on its website, and in written and oral statements made to recruit and enroll prospective students, S&C misrepresented:

- the scope, nature, character, and length of its programs,
- its influence and historical success in finding jobs in students' field of study,
- the employment opportunities available in students' field of study,
- the assistance S&C provided in obtaining employment in students' field of study,
- the availability of internships, together with the training provided by and employment opportunities accompanying internships, and
- the cost of certification tests taken by students.

3. Perhaps the most persuasive—and most pernicious—of S&C's misrepresentations related to employment. S&C told consumers and prospective students that virtually all students at S&C obtain jobs in the students' field of study when S&C knew or should have known that this was untrue.

4. Students enrolled in S&C's programs and provided tuition and fee monies to S&C based on S&C's false and/or misleading statements.

5. Students induced to enroll in S&C's programs by S&C's false and/or misleading representations incurred substantial debt in order to make tuition payments to S&C. Despite incurring this significant expense, a large number of these students have not obtained jobs in their field of study, or jobs at all, and are or will be unable to repay their loans. When students default, their access to credit is severely impaired, their future wages may be garnished, and their

debts are not dischargeable in bankruptcy. Taxpayers ultimately cover the costs of default, and S&C keeps the students' tuition and fees monies. Student Jessica O. stated: "I felt like I was at a car dealership buying an education instead of a car. They were quick to accept me and enroll me, then I was on my own." Student Kathelyne P. said: "[t]hey are just interested in making money." Student Mark T. stated: "I feel the whole thing was a scam."

JURISDICTION AND VENUE

6. The Attorney General is authorized to bring this action pursuant to G. L. c. 93A, § 4. The Attorney General has an interest in preventing unfair or deceptive acts or practices in order to promote the health and economic well-being of those who live and transact business in Massachusetts.

7. This court has jurisdiction over the subject matter of this action pursuant to G.L. c. 93A, § 4.

8. This court has jurisdiction over defendant S&C pursuant to G.L. c. 223A, § 3(a) and (b). Pursuant to G.L. c. 223, § 5 and G.L. c. 93A, § 4, venue is proper in Plymouth County.

PARTIES

9. The Plaintiff is the Commonwealth of Massachusetts, represented by the Attorney General, who brings this action in the public interest to remedy S&C's unlawful conduct and to enjoin future unlawful behavior.

10. Defendant S&C is a corporation with a principal place of business at 460 Belmont Street, Brockton, Massachusetts. S&C has three campuses, one in Massachusetts and two in Florida. It also offers online training.

STATEMENT OF FACTS

A. For-Profit Schools

11. For-profit schools, which award, variously, bachelor's and associate degrees and certificates, are owned and operated by businesses and business persons. *For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success*, United States Senate, Health, Education, Labor and Pensions Committee, p. 1 (July 30, 2012) ("Senate Report"). Like any business, their principal function is to produce returns for owners and shareholders (*id.*).

12. The for-profit education sector has grown significantly since the early 2000s. Pell grants to for-profit schools increased from \$1.1 billion in the 2000-2001 school year to \$7.5 billion in the 2009-2010 school year (*id.*, p. 2). For-profit schools receive most of their revenue from the federal government in the form of federal student grants and loans. During 2009-2010, the 15 publicly traded for-profit education companies received 86% of their revenues from taxpayers (*id.*). Taxpayer investment in for-profit schools was \$32 billion in 2009-2010 (*id.*).

13. The business model of for-profit schools typically focuses on students from low or lower income families with modest financial resources (*id.*, p. 1) who are eligible for federal funds in the form of grants and loans. About 96% of students attending for-profit institutions take out federal loans to pay for their training (*id.*, p. 6). For-profit schools enroll about 12% of students seeking post high school training, but take nearly a quarter of all federal educational loans and grants.

14. For-profit programs are expensive. Certificate programs at for-profit schools average 4.5 times the cost of comparable programs at public schools (*id.*, p. 3). The schools'

tuition charges are often determined based on company profit and marketing goals, rather than anticipated academic and instruction expenses (*id.*).

15. In 2009, marketing consumed 22.7% of for-profit school revenue, and profit 19.4% (*id.*, p. 5), or, together, 42.1% of for-profit schools' revenue.

16. By contrast, for-profit schools spend relatively little on education. In fiscal year 2009, only 17.2% of revenue was spent on instruction, less than half the expenditure on profit and marketing (*id.*).

17. Students at for-profit institutions typically have poor outcomes. A large number of students leaving for-profit schools are unable to obtain employment (*id.*, p. 7). Nearly a quarter of for-profit students default on their loans within three years of graduation (*id.*). About half will default at some point.

18. Overall, the 12% of students at for-profit schools nationally comprise about 48% of all defaults.

B. S&C's Medical Office Training Programs

19. S&C, a for-profit institution, was established in 1993 by an affiliate, Sullivan and Cogliano Staffing Services, which had provided staffing services to clients since 1966. Between 1993 and 2006, S&C was a training center for career-ready computer applications and business technology. S&C's programs award certificates only.

20. Throughout its existence, S&C has offered basic computer skills courses, referred to in S&C's catalogs in 2010 and 2011 as Microsoft Office Options and Microsoft Office Basics. These courses require 100 clock hours and 180 clock hours of instruction respectively. The Options course teaches basic skills for Windows, Data Entry, Word, Excel, Access, and

PowerPoint; the Basics course adds an advanced Windows course, a production lab, an internship and a lecture. The cost of these courses during the 2011 academic year was \$1,500 for the Options course and \$2,500 for the Basics course. S&C also offers individual computer application courses of 10 to 60 hours of instruction at a cost (in 2011) of \$195 to \$925.

21. The Options and Basics computer courses do not require a high school diploma or GED for admission. According to S&C's catalog (in 2011), the Options program "provides students with career ready computer office skills along with keyboarding and production lab time in order to qualify for employment in a number of computer related roles."

22. Beginning in or about 2007, S&C focused on creating and/or marketing programs longer and more expensive than its Options and Basics computer training. These included two medical office training programs. The first, the Medical Office Assistant program ("MOA"), was S&C's most expensive program for medical office training. S&C also offered a less expensive training program for medical office related training, the Office Professional Medical program ("OP-Medical"). As a prerequisite, these programs required a high school diploma or GED (or an "ability to benefit" showing until federal funding for students without high school diplomas or GEDs was eliminated in 2012). The MOA program required 920 clock hours of instruction. The OP-Medical program required (and continues to require) 720 clock hours of instruction.

23. The MOA program was established in or about 2008 and, as a result of poor employment outcomes and/or complaints from students, has been shut down. It graduated its last students in 2012. The OP-Medical program is ongoing.

24. As a practical matter, access to federal grants and loans, which make tuition more affordable for students, was necessary to enroll students in the more expensive MOA and OP-Medical programs.

25. Federal student loans were initially authorized under Title IV of the Higher Education Act of 1965 (“Title IV loans”). Since 2010, all Title IV loans have been provided under the William D. Ford Direct Loan program, initially codified in the Omnibus Reconciliation Act of 1993. Prior to 2010, a sister program, the Federal Family Education Loan Program (FFELP), offered loans from private borrowers guaranteed by the federal government. Direct loans include both subsidized loans (with a current interest rate of 3.4%) and unsubsidized loans (the current interest rate is 6.8%).

26. The vast majority of students in the medical office training programs at S&C receive Title IV funding under the FFELP or direct loan programs.

27. For all 183 students receiving Title IV loans and enrolling in the MOA program between late 2008 and August 30, 2010 (and exiting the program at various points in 2009-2011), the average cost of the MOA program (tuition and fees) was about \$14,000. For all 211 students receiving Title IV loans and enrolling in the OP-Medical program between October 2007 and October 2011 (and exiting the program at various points between 2008 and 2012), the average cost of the OP-Medical program was about \$12,000. (The 183 MOA students and 211 OP-Medical students who took out Title IV loans and enrolled and exited during the specified periods are referred to in the Complaint as the “sample”.)

28. The total amount of tuition and fee payments acquired by S&C as a result of the enrollment of the 183 MOA students in the sample was between about \$1.8 million and about \$2.3 million. The total amount of tuition and fee payments acquired by S&C as a result of the

enrollment of the 211 OP-Medical students in the sample was between about \$1.9 million and about \$2.3 million. Combined, the total amount of tuition and fee payments from medical office training program students in the Title IV sample was between about \$3.7 million and about \$4.6 million.

29. To establish eligibility for Title IV funding, an institution must be accredited. S&C was first accredited in 2005 by the Council on Occupational Education (COE), located in Atlanta, Georgia.

30. Accreditation is a peer-review process in which an accrediting organization examines a school to determine whether it meets certain criteria specified by the accreditor. The information necessary to determine a school's initial eligibility for accreditation is provided by the school itself in the form of a self-study, a lengthy report containing data requested by the accreditor. The school also submits annual reports to the accrediting body.

31. In addition, the accreditor performs occasional site visits to schools seeking to obtain or renew their accreditation. COE teams visited S&C in 2006 and 2011.

32. Following S&C's initial access to Title IV funding in 2006, S&C's enrollments and revenues increased greatly. Between 2006 and 2010, S&C's tuition revenues more than quintupled, from \$1,912,254, to \$10,045,531. The Brockton campus's tuition revenues similarly increased from \$722,823 in 2006 to \$3,327,400 in 2010. In or about 2008, the medical office training programs became S&C's largest programs by number of students and by revenue.

33. The increases in tuition revenues were associated with several other changes in S&C's financial position:

--S&C's operating income before taxes rose from \$35,567 in 2006 to \$2,013,228 in 2010, an increase of over 5000%. The Brockton campus's net operating income before taxes similarly increased from \$7,312 to \$850,529 during this period.

--The distribution of income to shareholders, who include the President of S&C and members of his family, increased from \$0 in 2006 to \$1,080,000 in 2010.

--S&C transfers to affiliates owned by the President of S&C and members of his family increased from \$0 in 2006 to \$861,942 in 2010. These payments, according to S&C, involved repayment of the affiliated company's payroll costs and of certain general operating costs of the affiliate.

--Tuition dollars spent on advertising increased from \$127,361 in 2006 to \$487,650 in 2010.

34. Between 2006 and 2010, the percentage of S&C revenues represented by federal Title IV funding also increased substantially, from 22.38% in 2006 to 86.13% in 2010. A portion of the remaining 13.87% of tuition revenue received by S&C is also comprised of state and federal government funds. During 2010, S&C received less than 0.5% of its tuition revenues, or \$28,466, directly from students.

35. While school profit and payouts to insiders increased, students' education and employment outcomes suffered.

36. Education spending as a proportion of tuition revenue dropped. Between 2006 and 2010, the proportion of tuition revenue spent on instruction declined by about half, from about 31% of tuition revenue in 2006 to about 15% of tuition revenue in 2010.

37. Most students in S&C's medical office training programs were unable to find employment in medical office jobs. Instead, a large number of students in these programs settled for jobs waitressing, worked in big box stores or fast food restaurants, or obtained low-paying retail, telemarketing, child care, custodial, security, transportation, manufacturing, and similar jobs. A number of students continued in jobs they held before enrolling in S&C, jobs they intended to escape by attending the medical programs at S&C. Many others were unable to obtain jobs.

38. When they exited from S&C, either by graduating or dropping out of school prior to graduation, the vast majority of S&C students in the medical office training programs had substantial federal loan debt. The average debt for student graduates was in excess of \$7,000.

39. Many S&C students were (and are currently) unable to repay their loans. The United States Department of Education (DOE) reviews three-year cohort default rates, *i.e.*, the percentage of students who default in the first three years after leaving school, in order to determine whether schools may continue to access Title IV funds. (Prior to 2012, two-year default rates were the standard.) S&C's three-year cohort default rate as of September 2012 (for fiscal year 2009) was 17%, a rate that reflects defaults for students from all programs at all campuses.

40. S&C's 2009 17% cohort default rate does not mean that 83% of the 2009 cohort are able to repay their loans. S&C undertakes default management efforts that keep students out of default for the duration of the federal monitoring window, postponing or eliminating defaults in the near term in order to reduce reported rates.

41. S&C has contracted with McKenzie Financial, Inc. (McKenzie) to manage its default rates and "save" S&C students from defaulting on their loans during the DOE review window. As of February 3, 2012, of the 521 students in the 2010 and 2011 cohorts McKenzie was contracted to manage, it "saved" 163 students, or about 31% of the group, from appearing on the DOE default report. McKenzie was also contracted to "save" defaults for the 2009 cohort. (The McKenzie "save" report is attached to the Complaint as Exhibit 1; the 2009 data were redacted by S&C.) Assuming McKenzie's "save" rate with respect to the 2009 cohort was comparable to the save rate with respect to the 2010 and 2011 cohorts, an additional 31% of the

2009 cohort, or 48% of all students (31% + 17%) in the 2009 cohort, would have defaulted on their students loans without management.

42. Most students who are “managed” by third-party vendors end up in forbearances or deferments, which ultimately increase the payments students are required to make over the life of their loans (Senate Report, p. 9). A large number of these students eventually default on their loans. Many vendors contracted to manage student loan default are principally concerned with lowering the schools’ reported cohort default rate and have little concern for a student’s particular situation “or whether [their actions are] in the best interest of the individual.” (*Id.*)

C. S&C’s Unfair or Deceptive Acts or Practices

43. Beginning in or about 2007 and continuing through the present, S&C engaged in promotional and recruiting activities designed to attract new students to its medical office training programs. These activities included (and continue to include) advertising in public places, providing written information to consumers and prospective students via documents and on S&C’s website, and making oral statements to consumers and prospective students during the recruitment and enrollment process.

44. During this period, a number of S&C’s advertisements and statements to consumers and prospective students were false and/or misleading, and a portion of the information provided to consumers was inaccurate. The false, inaccurate, and/or misleading advertising, information, and recruitment statements related to the scope, nature, character, and length of the medical office training programs, S&C’s influence and historical success in finding employment in medical offices for students, the availability of meaningful internships in the

students' field of study, the employment assistance the school provided to students, and the cost of certification examinations.

45. These misrepresentations were made for the purpose of, and had the effect of, inducing students to enroll in S&C's medical office training programs and providing access to tuition and fee monies acquired by S&C.

46. As a result of S&C's misrepresentations, students in the S&C medical office training programs incurred a substantial amount of debt without obtaining jobs in medical offices and without an increase in earning power sufficient to repay their loans.

a. False and/or Misleading Representations Concerning Student Training

i. Misrepresentations concerning the scope of study

47. Starting in or about 2007 and continuing through at least a portion of 2011, certain S&C advertisements specifically referred to "medical assistant" employment and to "medical training". Pictures in advertisements showed a woman wearing blue hospital scrubs and a white exam coat with a stethoscope around her neck. (Copies of advertisements on buses and other public venues are attached to the Complaint as Exhibit 2.)

48. S&C's references in advertisements and statements to "medical assistant" and its pictures in promotional materials of medical personnel with stethoscopes led consumers and prospective students to believe they would receive clinical training as medical assistants, including training in the use of medical equipment such as stethoscopes.

49. S&C's employees told students, including Yolanda B., that S&C was affiliated with a number of hospitals and other clinical sites, networked with many such organizations, and placed students in jobs at the South Shore and Good Samaritan Hospitals. S&C employees also

told prospective students that they would “shadow” a medical assistant or other health provider as part of their training in the MOA program.

50. Some students were asked to participate in a commercial for S&C in which they dressed up as medical personnel and checked pulses. The purpose and intended effect of the commercial was to induce students to enroll in the medical office training programs at S&C.

51. A number of students, including Yolanda B., Judith N., Connie O., and Gina A., told S&C employees that they were interested in being trained as medical assistants, and S&C employees explicitly stated to the students that the MOA program trained students to become medical assistants.

52. In fact, S&C’s programs have never trained students to become medical assistants. S&C has never been affiliated with hospitals, has never placed students in jobs as medical assistants, and has never provided medical or clinical training or “shadowing” programs at hospitals. S&C has never taught students to take pulses or use a stethoscope. One S&C employee stated:

“Q: And it is – it was true then and it’s true now that Sullivan and Cogliano programs do not qualify students for jobs in which they would need to use a stethoscope; is that right?

A: To the best of my knowledge that would be correct; although, I don’t have complete knowledge of that in that I haven’t been to every facility that any of our students have gone to.

Q: But there’s no portion of the Sullivan program that teaches students to use stethoscopes?

A: To the best of my knowledge, that is correct, yes.”

53. S&C’s accreditor COE instructed S&C in or about August 2009 to remove references to “medical assistant” in its descriptions of S&C’s programs because these programs have never been medical assistant programs and S&C has never been accredited to offer a medical assistant program. COE employee Alex Wittig stated: “I reminded [S&C] that the

'Medical Assistant' program appearing on [the] institution's advertising was not a medical assistant program as may be understood by the general population. The program offered by Sullivan and Cogliano Training Centers is approved by our agency as a 'Medical Office Assistant' program and should be advertised as such." (A copy of the COE letter is attached to the complaint as Exhibit 3.)

54. Even after COE instructed S&C to remove the reference to "medical assistant", advertisements promoting S&C's training of "medical assistants" remained on buses and/or in other public venues until at least March 2011.

ii. Misrepresentations concerning the nature and character of the training

55. Starting in or about 2008 and continuing through the present, S&C advertised and marketed its medical office training programs as a way to obtain a traditional teacher-based education that would make students attractive to employers in medical settings. In written and oral statements, S&C led consumers and prospective students to believe they would be taught in a classroom by experienced teachers.

56. From 2010 or earlier through the present, S&C's catalogs state: "Dedication to the overall success of its students motivates S&C to continually strive to maintain its reputation of delivering the highest quality training possible through a combination of a qualified, experienced staff; current, well-organized curriculum; and an array of modern equipment which reflects current industry standards."

57. S&C employees told prospective students during the recruitment process that the classes were "self-paced" but that instructors in each classroom had responsibility for teaching the material to students. Student Marjorie T. stated: "I asked the recruiter if students were taught in a classroom setting, and I was told yes."

58. In its advertising and promotional materials and in statements during recruitment and enrollment, S&C never told students that S&C classes are self-taught.

59. In fact, S&C's method of instruction is to place students at computers and provide them with a set of books or manuals. Students work alone in front of the computer terminals, going through the materials in the books and manuals and teaching themselves. S&C employees are nominally in charge of the classes, but are not always present in the room or available to answer questions.

60. Student Tasha J. stated: "All of the training I received in the MOA program was out of a book and essentially self-taught. Even when an S&C employee was present, there was no instruction, and the S&C employees were often unavailable or unable to answer questions." Student Jessica C. stated: "I expected to be trained in all areas of the medical office assistant field. Instead, I was just given book after book to read and do exercises and tests by myself on a computer." Other students stated:

--"It was more a learn on your own course." (Karen C.)

--"I did not know it was self-taught." (Christine D.)

--"I expected teacher led classes, course was self-study with a proctor in the room for questions." (Lisa G.)

--"I thought it would be classroom environment taught by teachers, not computers." (Heather G.)

--"Didn't realize how much I'd be on my own." (Allyson H.)

--"I thought it would be hands on in trainings with classroom instructions. Instead we were thrown books at and had to figure it ourselves." (Jill R.)

61. When S&C employees were not in the classroom or were unavailable, S&C classes were often taught by students. Student Yolanda B. stated that a "[m]ajority of the staff were students themselves." Student Jason C. stated that "the classroom was occupied by about

25 students at a time with only one instructor. In many instances I was forced to rely on other students to assist me with my work because of the lack of capable staff during my attendance. Many times they allowed Terri, who is listed as an Administrative Assistant, to run a class full of students while the only DOE approved instructor was on vacation or out to lunch... the remaining instructors were called 'interns' and some were paid by the school to assist students but these interns were just attending class with me so I couldn't understand how they were all of a sudden qualified to teach ..."

iii. Misrepresentations concerning the time it takes to complete the programs

62. Beginning in or about 2007 and continuing until at least March 2011, S&C advertised that its medical office training programs led to certification in "just weeks": "Train for Your Dream Job! Start NOW and Get CERTIFIED in JUST WEEKS!" These advertisements appeared on buses and in billboards or similar venues. (Copies of the advertisements are attached to the Complaint as Exhibit 4.)

63. In fact, the MOA and OP-Medical programs are nine month and seven month programs respectively. The average time to graduation for students in the MOA program sample was 434 days (about 62 weeks); the median time to graduation for these students was 409 days (about 58 weeks). For OP-Medical graduates in the sample, the mean time to completion was 321 days (46 weeks), and the median 315 (45 weeks).

64. S&C's representations concerning the scope, nature, character, and timing of its programs were false and/or misleading and deceived or had the tendency or capacity to deceive or mislead consumers and students, inducing consumers to enroll in S&C's medical office training programs and to provide tuition and fee monies to S&C.

b. False and/or Misleading Representations Concerning Job Placement

i. Misrepresentations to consumers and prospective students

65. S&C holds itself out and markets its business to consumers and prospective students as a school that will enable them to obtain jobs in their field of study.

66. S&C's catalogs from 2010 or earlier through the present state that "[a]t [S&C], we concentrate on job specific training." The catalogs also state:

"The staff and faculty of the school and its placement affiliates derive tremendous satisfaction from helping students prepare for career ready employment. We hope you will join us so that you, too, will experience career satisfaction and enjoy the economic and social rewards of a position ideally suited to your interests and abilities."

67. From 2011 or earlier through the present, S&C's website states that "we offer a unique way to prepare for your new career: focused training that concentrates on developing the skills employers are looking for." The website also states: "Develop the skills you need for an exciting, new career.... With training focused on preparing you for these real-world careers, [S&C] is your premier choice if you're interested in seeking career-ready training."

68. A key part of S&C's recruiting and promotional efforts to attract students to its medical office training programs involved written and oral references to jobs in medical offices and to S&C's influence and historical success in placing students in these jobs.

Promotion of medical jobs

69. From 2009 or earlier through the present, in its public ads, in its catalogs provided to students and prospective students, in its written recruitment and enrollment materials, on its website, and in oral recruitment statements made by S&C employees to consumers and prospective students, S&C stated that its medical office training programs were designed and intended to prepare students for jobs in medical offices.

70. On its website, from 2011 or earlier through the present, S&C states that “[t]he Medical Office Assistant program prepares you for job titles such as:

Medical Office Assistant
Medical Receptionist
Medical Records
Medical Insurance Biller
Medical Scheduler
Medical Office Clerk
Medical Insurance Coder
Medical Transcriptionist.”

71. S&C’s MOA website states: “Don’t hesitate to put yourself in a position to get an extra hiring advantage over other applicants in any healthcare facility.”

72. From 2011 or earlier through the present, S&C’s website states that “some of the career opportunities our [OP-Medical] graduates qualify for are:

Medical Transcription—Join one of the fastest-growing occupations today. Whether you work from home or in the office, this position gives you ultimate flexibility and maximizes your computer skills and newly achieved medical office certification.

Medical Receptionist—Be the friendly face of a healthy facility by serving and engaging patients, medical professionals and insurance representatives.

Medical Records—Be an effective health professional by keeping medical accounting records, patient scheduling and billing, and their health records on the computer.

Medical Insurance Biller—Serve both the patients and their insurance representatives by processing claims and policy requirements from most major healthcare payers.”

73. From 2010 or earlier through at least 2011, S&C’s catalog stated: “The MOA program is designed to provide students with career ready computer office skills along with Medical Billing, Coding and Terminology in order to qualify for employment in a number of non-clinical medical related roles and to achieve certification as a Medical Office Assistant.”

From 2010 or earlier through the present, S&C’s catalog states that the OP-Medical program “is

designed to provide students with career ready computer office skills along with Medical Billing, Coding and Terminology in order to qualify for employment in a number of medical related roles.”

74. During the period 2008 or earlier through the present, S&C led consumers and prospective students to believe that its medical office training programs were designed or intended to train and prepare students for jobs in medical offices.

Promotion of historical placement success

75. From 2009 or earlier through the present, in public ads and oral statements to consumers, S&C advertised its success in placing students, promoting placement rates for the medical office training programs of between 70% and 100%.

76. In recruiting students to enroll in the MOA program at S&C, S&C employees made explicit numerical representations concerning S&C’s historical success in placing students in jobs in medical offices in their conversations with prospective students.

77. Student Jill F. stated: “I was told that at the end of my program I would be placed in a job in what I had studied. That has not happened. Information on placement was deceiving, said you will be placed in job in the medical field.” An S&C employee told students Susan M. and Caroline R. that S&C had a 100% placement rate. Another S&C employee told student Jill R. that S&C had a 90% placement rate. And an S&C employee told students Gina A. and Connie O. that S&C had an 85% job placement rate. S&C employees told student Michelle S. that S&C had an 80% placement rate. Student Shalindi R. “was told [S&C had a] 70% success rate in finding students jobs in field. I was told this number before I enrolled.”

78. During this period, in advertisements on buses and other public venues, S&C referred to an “85% placement rate” for the institution as a whole. (An exemplar advertisement

referring to the 85% placement rate is attached to the Complaint as Exhibit 5.) On its website between 2009 and the present, S&C advertised that it “placed over 85% of graduates.” (Copies of S&C websites referring to the 85% placement rate are attached to the Complaint as Exhibit 6.) S&C’s President stated that the 85% placement rate in S&C’s promotional materials refers to “training related placement”:

“Q. ...85% of your graduates find jobs in the areas which they train at the school, is that correct?

A. I don’t know if you are saying that correctly, no.

Q. Why don’t you say it correctly? I am asking you to interpret what you have here. What does ‘training-related placement’ mean?

A. People who get placed in areas of their training programs.

Q. At the school?

A. Correct.”

79. S&C led consumers and prospective students to believe that historically 70-100% of S&C students in the medical office training programs obtained employment in medical office jobs.

80. S&C did not make available to prospective students in the medical office training programs, at or before the time the students enrolled at S&C, any underlying data or employment statistics that substantiated the truthfulness of the placement percentages used in S&C advertisements, on S&C’s website, or in oral statements by S&C employees.

ii. Misrepresentations to COE

81. One of COE’s accreditation standards requires schools to submit information concerning employment outcomes for students. COE establishes baseline standards of employment that schools must meet in order to obtain or renew accreditation. The current COE benchmark accreditation standard for employment is a 70% placement rate.

82. In connection with the employment standard, S&C submits annual reports of its placements to COE. These reports provide aggregate placement numbers and do not contain

back-up or support for the placements or the job categorizations the school makes. COE relies on the school's self-reporting and does not typically (and in the case of S&C did not) check or approve the numbers provided in the annual reports. During its site visits, a COE team randomly verifies the placements of at least 5 students in each program, but does not typically review, and in the case of the site visits to S&C, did not review or approve the placements or job categorization of the remaining students in S&C's medical office training programs. COE's placement standard works in conjunction with its condition of membership that all member schools act with honesty and integrity. If a school does not meet COE's placement standard or its conditions of membership, there is a range of disciplinary actions that the accreditor can take.

83. The Senate Report found that the self-reporting and peer-review nature of the accreditation process often exposes it to manipulation by schools "more concerned with their bottom line than with academic quality and improvement." (Senate report, p. 7)

84. During the period 2009 through 2012, S&C's reports to its accreditor showed placement rates of between 75% and 87% for the Brockton campus as a whole, and placement rates for the MOA and OP programs of between 70% and 100% during this period.

85. In its annual reports submitted in 2011 and 2012, for reporting years ending June 30 of 2010 and 2011, S&C represented placement rates for its MOA program of 95.65% and 73%, respectively. S&C's reported placement rates for the OP program as a whole were at or above 70% for reporting years ending 2009 through 2011.

86. The placement numbers S&C published on its website as recently as March 2013 for the Medical Office Assistant and Office Professional programs as part of its mandatory consumer disclosures were 72.41% and 72.73%, respectively.

iii. Misrepresentation to the Massachusetts Department of Elementary and Secondary Education

87. In 2011, S&C student Kathryn P. complained to the Massachusetts Department of Elementary and Secondary Education (DESE) that she was unable to secure in-field employment after completing S&C's MOA coursework and obtaining medical-related certifications provided by the National Center of Competency testing (NCCT). NCCT certifies students in MOA and in insurance billing and coding. S&C responded to Ms. P.'s complaint by representing to DESE, as evidence of the adequacy of its training, that its MOA placement rate was between 88% and 93.5%.

88. S&C intended DESE to believe that the 88-93.5% placement rate contained in S&C's statement to DESE indicated that the vast majority of S&C MOA students obtain medical office jobs, for which the NCCT MOA and insurance and coding certifications are pertinent.

89. In its findings of October 2011, DESE stated: "The complainant asserts that she obtained two (2) certifications while taking the program and that both are not desirable to potential employers. The complainant alleges that the certifications received as a result of [S&C]'s program are not desired by employers. The complainant does not indicate who these employers are or how many of them denied her employment due to these certifications. However, [S&C] claims to have had an 88-93.5% placement rate between 2009 and 2010 for its Medical Office Assistant students. If the certifications are inadequate for employment, it would be unlikely that [S&C] could sustain such a rating. Based on these facts, the Department finds insufficient information to make a determination on this allegation."

90. DESE relied on S&C's placement statistics as evidence of S&C's success in placing MOA students in medical office jobs. The placement percentages provided to DESE by S&C were false and misleading.

iv. S&C Placed Few Students in Medical Office Jobs

91. S&C led consumers, prospective students, its accreditor, and government officials to believe that the large majority of S&C's medical office training program students obtained employment in medical office jobs. But S&C knew or should have known that the placement percentages of 70% to 100% in its advertisements, reports, and recruitment statements, and in its reports to COE and to DESE were inaccurate, and that its actual success in placing students in medical office jobs was considerably lower. S&C represented to consumers, prospective students, COE, and DESE that medical training program students had a high probability of obtaining jobs in medical offices when S&C knew or should have known that the probability of obtaining such employment, based on S&C's own historical experience, was in fact low.

92. In the sample of 183 MOA students, 21 graduates and 3 drop-outs obtained jobs in medical offices. In the sample of 211 OP-Medical students, 32 graduates and 3 drop-outs obtained professional jobs in medical offices. (A list of employers and job titles for these students is attached to the Complaint as Exhibit 7.)

93. As a percentage of all students in the sample entering the MOA program, 13% obtained medical office assistant jobs. Of all students in the sample entering the OP-Medical program, 17% obtained professional jobs in medical offices. Of the 117 MOA graduates and the 144 OP-Medical graduates in the sample, 18% and 22% received jobs as medical office assistants and professionals in medical offices respectively.

Placements in Medical Offices
Based on Student Sample Data Provided by S&C

	Column A	Column B	Column C	Column D	Column E (C ÷ B)	Column F ((C+D) ÷ A)
Program	Students Enrolling	Graduates	Graduates Obtaining Jobs in Medical Offices	Drop-Outs Obtaining Jobs in Medical Offices	Of Graduates, Percent Placement in Medical Offices	Of Enrollees, Percent Placement in Medical Offices
MOA	183	117	21	3	18%	13%
OP-Medical	211	144	32	3	22%	17%

94. S&C collected information from employers to verify that students received jobs.

Of the 183 students in the MOA program sample, 19 graduates and 3 drop-outs obtained medical office assistant jobs that were verified by their employers, 12% of all students and 16% of graduates respectively. Of the 211 students in the OP-Medical program sample, 28 graduates and 2 drop-outs obtained medical office assistant jobs that were verified by their employers, 14% of all students and 19% of graduates respectively.

Verified Placements in Medical Offices
Based on Student Sample Data Provided by S&C

	Column A	Column B	Column C	Column D	Column E (C ÷ B)	Column F ((C+D) ÷ A)
Program	Students Enrolling	Graduates	Students Obtaining Jobs in Medical Offices	Drop-Outs Obtaining Jobs in Medical Offices	Of Graduates, Percent Placement in Medical Offices	Of Enrollees, Percent Placement in Medical Offices
MOA	183	117	19	3	16%	12%
OP-Medical	211	144	28	2	19%	14%

95. A larger number of students obtained no jobs at all. Of the 183 students in the MOA program sample, 17 graduates and 37 drop-outs, totaling 54 students, or about 30% of all students in the sample, were unemployed after leaving the S&C program.

96. Overall, according to S&C's records, 116 students (graduates and drops) in the MOA sample received placements. In the OP-Medical sample, the number was 150. Of these recorded placements, about half were waitress, restaurant and fast-food, housekeeping, laundry, retail, telemarketing, child care, custodial, security, manufacturing, and transportation jobs. (A list of employers and job titles in these fields is attached to the Complaint as Exhibit 8.) These jobs are typically low-paying or minimum wage jobs that do not enable students to repay the federal student loans they needed to attend S&C.

97. For purposes of COE's accreditation of the MOA and OP-Medical programs, only verified legitimate jobs in medical and related offices are considered placements. Retail, sales, telemarketing, waitress, restaurant and fast food, housekeeping, laundry, child care, custodial, security, manufacturing, driving, warehousing, shipping, landscaping, construction, and similar jobs are not appropriate placements for accreditation of the MOA program.

98. Some of the jobs "counted" by S&C in its historical placement percentages were temporary jobs, even though S&C knew that students expected to obtain full-time jobs when they enrolled at S&C.

99. S&C's representations concerning placement were false and/or misleading and deceived or had the capacity or tendency to deceive or mislead consumers, students, its accreditor, and the DESE, inducing consumers to enroll at S&C and provide tuition and fee monies to S&C, enabling S&C to obtain accreditation and access to Title IV funding for its medical office training programs, and inducing DESE to dismiss a student complaint.

c. False and/or Misleading Representations Concerning School Career Services

100. From 2008 or earlier through the present, in its advertising and in oral and written statements to consumers and prospective students, S&C promoted the services it would provide to students to help them obtain employment in their field of study. During this period, S&C employees emphasized S&C's connections to employers, its ability to set up employment interviews for students, its job fairs, and the job leads it would provide to students.

101. From 2011 or earlier through the present, S&C states on its website:

--"At Sullivan and Cogliano Training Centers, your career preparation doesn't stop in the classroom. Career-focused education is about getting the training that employers are looking for. Our Career Services team is about helping you find the right opportunity and employers for you and your future."

--"The Career Services team can help you showcase your education and skills and secure employment.... You'll also learn... how to successfully make the connections that could help you get the job you want and the career you deserve."

--"Do you offer placement assistance? Our #1 passion is to assist students in obtaining meaningful employment."

102. From 2010 or earlier through the present, S&C refers in its catalogs to "[o]ur well-established, long-term relationships with area employers...." In advertisements, S&C refers to its "well established, long-term relationships with nationwide employers...."

103. S&C employees told students that representatives of various hospital employers would come to S&C to visit with students, and that many students obtain jobs through these employer visits.

104. In its promotional materials and recruitment statements, S&C intended consumers and prospective students to understand that S&C would provide meaningful assistance to students in obtaining jobs in medical offices. Students stated:

--"I thought they set you up with interviews." (Michelle B.)

--"I remember when I started they said after graduation they should help to get a job." (Feliciana M.)

--"They told me when I enrolled that they would set up interviews with companies after the program, which they never did, and that I would not have a problem with getting placed, which was not true." (Jayne M.)

--"I thought the job placement program they advertised was where they placed you in a company they had a relationship with. Or at least interview with." (Kathleen M.)

--"They told me there was constant job fairs and internship opportunities. There wasn't." (Andrea T.)

105. In fact, S&C's placement services, for most students, consisted of sending blast emails of jobs listed on Monster.com, Craigslist, and similar public websites.

106. Many of the jobs contained in the S&C emails were positions for which the students were not qualified. Most of the listings required education beyond the certificate level (associate or bachelor's degrees) or work experience, or both. A number of the jobs had little relation to the students' educational programs.

107. S&C never set up job interviews with medical employers for students in its MOA program. S&C never held job fairs attended by medical employers for students in the MOA program. MOA students did not receive jobs from hospital employers brought to the school by S&C.

108. S&C's representations concerning its placement services and assistance to students in finding jobs in their field of study were false and/or misleading and deceived and/or had the capacity or tendency to deceive or mislead consumers and students, inducing consumers to enroll in S&C's medical office training programs and to provide tuition and fee monies to S&C.

d. False and/or Misleading Representations Concerning Internships

109. From 2008 or earlier through S&C's elimination of its internship requirement in or about 2012, S&C represented to consumers and prospective students in its medical office training programs that they would receive internships in medical offices, enabling them to practice the medical skills taught in S&C's medical office training programs and to prepare for employment in medical offices. These internships were a standard and mandatory element of the medical office training programs.

110. From 2010 or earlier through 2011 or later, S&C's catalog stated that the internship course provided hands-on training to students that prepared them for employment: "In this course students learn how to implement those lessons learned through their hands-on training modules. The Internship course builds confidence in the student in order to be prepared for future work."

111. In S&C's 2011 Self-Study submitted to its accreditor, S&C described its ability to "maintain and continually secure" internships and represented to the accreditor that the internships were essential in fulfilling S&C's "mission statement", an important criterion in the accreditation process. According to S&C, "[w]e maintain and continually secure internship and externship opportunities where students are able to practice and implement skills that they have learned in the classroom environment. . . . Furthermore this internship practice provides the foundation to fulfill our mission statement by ensuring that our students receive up to date training leading to current careers in the areas of medical, office administrative and information technology."

112. S&C employees told students during the recruitment process that they would receive internships directly related to their training. MOA students were told such internships would be in hospitals or clinics.

113. According to one S&C employee, “[i]nternships are an integral part of our curriculum....”

114. However, many students, and most students in MOA, did not receive internships in medical offices. In fact, many students received no internship at all or received an “internship” working at S&C, helping teachers, administrators, or admissions employees.

115. Student Jason C. stated that “my internship...turned out to be me simply assisting within the school which made me not want to participate.” Student Connie O. was placed in an “internship” at S&C, helping students by answering their questions when S&C employees were not present or were unavailable to help students.

116. A number of students with “internships” at S&C were required by S&C to recruit other students. One S&C employee testified that “interns” were required to call prospective students in an effort to persuade them to enroll at S&C. “Q: Now, we’ve been told that some of the interns [at S&C] call prospective students to try to recruit them? A: Call prospective students for? Q: For recruiting purposes; is that true? A: Absolutely.”

117. Even students who received outside internships in medical offices often performed menial jobs unrelated to their training at S&C.

118. MOA student Alicia R. stated that she was given an internship answering phones at a physical therapy office. MOA student Jill R. received a truncated internship that did not relate to her field. Student Kathryn P. received an internship at a vendor of surgical supplies where her primary duty was filing. When S&C refused or was unable to provide her with an

internship related to her training in the MOA program, she complained to DESE, which in October 2011 ordered S&C to provide an appropriate internship:

“As part of the Medical Office Assistant (MOA) program, the complainant was placed in the office of a Surgical Supplier. However, the externship site does not appear to be appropriate as the company is a vendor and not a medical office or what is commonly considered a medical facility. The complainant asserts that she only filed paperwork and did not engage in activities related to the MOA curriculum. Therefore, the Department finds that [S&C] failed to provide an adequate externship to the complainant by placing her in a facility that does not provide work experience appropriate for MOA. Therefore, [S&C] must provide the complainant with an MOA externship in which the complainant is able to perform functions associated with an MOA program.”

119. Of the MOA graduates in the sample, about 42% received outside internships, 41% received no internship, and 17% received “internships” at S&C.

120. S&C’s representations concerning internships were false and/or misleading and deceived and/or had the tendency or capacity to deceive or mislead consumers and students, inducing consumers to enroll in S&C’s medical office training programs and to provide tuition and fee monies to S&C.

e. False and/or Misleading Representations Concerning Test Fees

121. From 2008 or earlier through the present, S&C charged students in its medical office training programs for the cost of certification exams given by outside vendors NCCT and Certiport. NCCT and Certiport prepare and grade the tests and determine which test-takers receive the pertinent NCCT and Certiport certifications. While students could graduate from an S&C program and receive a completion certificate without passing a third party certification exam, the NCCT and Certiport tests were considered an independent way to demonstrate to employers that S&C graduates met standards of competency.

122. During this period, S&C charged all students in the MOA program \$1000 in test fees. All students in the OP-Medical program paid \$600 in test fees.

123. S&C failed to disclose to consumers and prospective students that the actual cost of the tests was considerably less than the amount S&C charged for the tests.

124. The NCCT MOA and Insurance and Coding tests for recent graduates (less than six months) currently cost \$90 each. Certiport exams in Microsoft Office applications currently cost \$81 for each Microsoft 2003 application and \$96 for each 2007/2010 application (for example, Word, Excel, PowerPoint, Access). During the period 2008 to the present, the test costs were the same as or lower than current costs.

125. Many students take few or none of the tests. Of the 117 graduates in the MOA sample, 52, or 44% took no certification exams. Of 144 graduates in the OP-Medical sample, 82, or 57% took no certification exams.

126. Overall, the total test fees acquired by S&C from graduates in the sample were \$117,000 for MOA graduates and \$86,400 for OP-Medical graduates, or a total of \$203,400 from graduates of both programs in the sample.

127. The actual cost of the NCCT and Certiport tests taken by graduates in the MOA sample was, at most, \$16,422. The actual cost of the certification tests taken by graduates in the OP-Medical sample was, at most, \$11,508. The actual cost for graduates taking the NCCT and Certiport tests in both samples was, at most, \$27,930.

128. For the MOA and OP-Medical students in the sample, S&C charged at least \$175,000 more in test fees than the cost of the tests. These overcharges were not refunded to students, with the exception of student Kathryn P.

129. In 2011, student Kathryn P. complained about the test fee overcharge to the DESE, stating that S&C charged her \$1,000 in test fees for tests that cost \$300. S&C refunded the \$700 difference to Ms. P. The DESE stated: "The complainant asserts that S&C received an additional \$1000 for testing fees but only \$300 was used for that purpose. The adjustment was made when the school paid the remaining \$700 directly to the complainant. Based on the submission of the complainant, it appears that the unused portion of these funds was issued directly to the complainant by S&C. This is confirmed with documents provided by S&C. Therefore, the Department considers this portion of the complaint resolved."

130. S&C's failure to disclose the actual costs of the certification tests was misleading and deceived and/or had the tendency or capacity to deceive or mislead consumers and students, inducing consumers to enroll in S&C's medical office training programs and to provide fees to S&C.

CAUSES OF ACTION

Count One

(Violations of G.L. c. 93A)

131. The Commonwealth repeats and realleges paragraphs 1 through 130 of the Complaint.

132. S&C has engaged in unfair or deceptive acts or practices in violation of the G.L. c. 93A, section 2. Such unfair or deceptive acts or practices include without limitation the following:

- A. S&C made false and/or misleading representations to consumers and to prospective students concerning the nature, character, scope, and length of its medical office training programs, in violation of G.L. c. 93A, section 2.

- B. S&C made false and/or misleading representations to consumers, to prospective students, and to its accreditor, concerning job placement, and, in particular, concerning the usefulness of its medical office training programs in obtaining jobs in medical offices and its influence and historical success in finding jobs in medical offices for students in these programs, in violation of G.L. c. 93A, section 2.
- C. S&C made false and/or misleading representations to consumers and to prospective students concerning the assistance it provides to students in its medical office training programs in obtaining employment in their field of study, in violation of G.L. c. 93A, section 2.
- D. S&C made false and/or misleading representations to consumers and to prospective students concerning the availability of internships and the training provided by and employment opportunities accompanying internships for students in its medical office training programs, in violation of G.L. c. 93A, section 2.
- E. S&C failed to disclose to consumers and prospective students that the actual cost of the certification tests taken by students in its medical office training programs was considerably less than the amount S&C charged for the testing, in violation of G.L. c. 93A, section 2.
- F. S&C failed to disclose material information to consumers and prospective students concerning placement, internships, and the nature, character, scope, and length of its medical office training programs, in violation of G.L. c. 93A, section 2.

133. S&C's false and/or misleading representations to consumers, prospective students, and others were material and deceived or had the tendency or capacity to deceive or mislead potential and existing customers, inducing consumers to enroll in S&C's medical office training programs and to provide tuition and fee monies to S&C.

134. S&C knew or should have known that the representations provided to students were false and/or misleading. S&C knew or should have known that its acts or practices were in violation of G.L. c. 93A, section 2.

135. S&C acquired tuition and fee monies by reason of its unfair or deceptive acts or practices, causing students to suffer an ascertainable loss.

136. S&C's unfair or deceptive acts and practices resulted in harm to consumers.

Count Two

(Violations of 940 CMR 3.10 and 3.16)

137. The Commonwealth repeats and realleges paragraphs 1 through 136 of the Complaint.

138. S&C has engaged in unfair or deceptive acts or practices in violation of 940 CMR 3.10 and 3.16. Such unfair or deceptive acts or practices include without limitation the following:

- A. S&C made false or deceptive statements or representations or statements or representations that have the tendency or capacity to mislead or deceive students, prospective students, or the public in its advertising and promotional materials and in recruiting statements by S&C employees concerning the character, nature, quality, value, and scope of its medical office training programs, in violation of 940 CMR 3.10 (1) and 3.16 (1), (2).
- B. S&C made false or deceptive statements or representations or statements or representations that have the tendency or capacity to mislead or deceive students, prospective students or the public in its advertising and promotional materials and in recruiting statements by S&C employees concerning S&C's influence and historical success in obtaining employment for students in its medical office training programs, in violation of 940 CMR 3.10 (1) and 3.16 (1), (2).
- C. S&C made false or deceptive statements or representations or statements or representations that have the tendency or capacity to mislead or deceive students, prospective students or the public in its advertising and promotional materials and in recruiting statements by S&C employees concerning opportunities for employment in medical offices, in violation of 940 CMR 3.10 (2) and 3.16 (1), (2).
- D. S&C made false or deceptive statements or representations or statements or representations that have the tendency or capacity to mislead or deceive students, prospective students, or the public in its advertising and promotional materials and in recruiting statements by S&C employees concerning opportunities for employment in medical offices as a result of completion of the medical office training programs at S&C, in violation of 940 CMR 3.10 (3) and 3.16 (1), (2).
- E. S&C made false or deceptive statements or representations or statements or representations that have the tendency or capacity to mislead or deceive students,

prospective students, or the public as to services to be rendered in connection with the securing or attempting to secure employment for students in its medical office training programs, in violation of 940 CMR 3.10 (4) and 3.16 (1), (2).

F. S&C made false or deceptive statements or representations or statements or representations that have the tendency or capacity to mislead or deceive students, prospective students, or the public concerning availability of internships and the training provided by and employment opportunities accompanying internships for students in the medical office training programs, in violation of 940 CMR 3.10 (16) and 3.16 (1), (2).

G. S&C used language that had the tendency or capacity to mislead or deceive students, prospective students, or the public concerning the actual cost of the certification tests taken by students in the medical office training programs, in violation of 940 CMR 3.10 (16) and 3.16 (1), (2).

139. S&C's false and/or misleading representations to consumers, prospective students, and others were material and deceived or had the tendency or capacity to deceive or mislead potential and existing customers, inducing consumers to enroll in S&C's medical office programs and to provide tuition and fee monies to S&C.

140. S&C knew or should have known that the representations provided to students were false and/or misleading. S&C knew or should have known that its acts or practices were in violation of 940 CMR 3.10 and 3.16.

141. S&C acquired tuition and fee monies by reason of its unfair or deceptive acts or practices, causing students to suffer an ascertainable loss.

142. S&C's unfair or deceptive acts and practices resulted in harm to consumers.

RELIEF REQUESTED

WHEREFORE, the Commonwealth requests that this Court:

a) Issue a permanent injunction restraining S&C, its agents, employees and all other person and entities, corporate and otherwise, in active concert or participation with any of them from:

- i. making false and/or misleading representations to the public and to prospective and current students concerning the nature, character, scope, and length of its educational programs,
- ii. making false and/or misleading representations to the public, to prospective and current students, to its accreditor, and to DESE concerning job placement, and, in particular, concerning its influence in obtaining employment in students' field of study, its historical success in finding jobs for students in their field of study, and opportunities available for students in their field of study,
- iii. making false and/or misleading representations to the public and to prospective students concerning the assistance it provides to students in obtaining employment in their field of study,
- iv. making false and/or misleading representations to the public and to prospective and current students and to its accreditor concerning the availability of internships and the training provided by and employment opportunities accompanying internships,
- v. making false and/or misleading representations to the public and to prospective and current students concerning the actual cost of certification tests taken by students in S&C's programs
- vi. failing to disclose material information to the public and to prospective and current students concerning placement, internships, and the nature, character, scope, and length of its educational programs.

b) Order S&C to make full and complete restitution to all students in its medical office training programs, including but not limited to the repayment to students of all tuition monies acquired by S&C as a result of its unfair or deceptive acts or practices.

c) Order S&C to pay the Commonwealth civil penalties of \$5,000 for each violation of G.L. c. 93A, section 2, and costs, including reasonable attorneys' fees, pursuant to G.L. c. 93A, section 4.

d) Grant such other and further relief as this court deems just and proper.

Respectfully Submitted,

COMMONWEALTH OF MASSACHUSETTS

MARTHA COAKLEY
ATTORNEY GENERAL



Jenny Wojewoda, BBO#674722
Peter Leight, BBO#631580
Assistant Attorneys General
Office of the Attorney General
One Ashburton Place
Boston, MA 02108
(617) 727-2200

Dated: April 3, 2013

Appendix

Exhibit 1.....	The McKenzie “save” report
Exhibit 2.....	Copies of advertisements on buses and other public venues
Exhibit 3.....	A copy of the COE letter
Exhibit 4.....	Copies of advertisements claiming certification in “just weeks”
Exhibit 5.....	An exemplar advertisement referring to the 85% placement rate
Exhibit 6.....	Copies of S&C websites referring to the 85% placement rate
Exhibit 7.....	Employers and job titles of students employed in medical offices
Exhibit 8.....	Employers and job titles of students employed in Child Care/ Education, Manufacturing/Transportation/Security/Manual Labor/Custodial, Restaurant/Hospitality Services, Retail/Sales/Telemarketing

1



MCKENZIE FINANCIAL, INC.

Date: February 3, 2012

To: Accounts Payable
From: Lipton Z. McKenzie

Re: Contracts Status

Status report of contracts submitted by Sullivan and Cogliano Training Center to McKenzie Financial, Inc. contracts converted to the "Cohort" program.

School ID: 040393-00

	2009 [†]	2010	2011	2012	Total
Contract	124	211	310	186	707
In-School**		6	4	0	-10
Save		96	67	2	-165
Defaulted**	16	20	2	0	-22
DD		1	0	0	-1
Re-fun		3	2	0	-5
PL-us		0	0	0	0
BK-rup		0	0	0	0
PF-bor		1	3	0	-4
No Loan		1	1	0	-2
OC-pde*	11	15	37	0	52
Sub-total					498

% Default	12.9%	9.5%	0.6%	0.0%
% Potential Default	8.9%	7.1%	11.9%	0.0%

New Students** 18
Saves** 5

This summary is based on the student population received from the school.

[†] The Defaulters and Potential Defaulters (OC-pde) shown for 2009 are estimated based on the preliminary 3-year Cohort Default Rate, which will be released in February 2012.

*Potential Defaulters (OC-pde): Contracts that are over 181 days past due special handling is given to these contracts. These borrowers were delinquent, as of 10/1, and will not affect the cohort rate.

3520 West Broward Blvd. — Suite 114 • Fort Lauderdale, FL 33311
Phone: 800-262-5012 • Fax: 888-707-3704 • E-mail: lmckenzie@mckenziefinancial.com
www.mckenziefinancial.com

2



3 / 13 / 11



H3

May 28, 2010

10/12/08



9090

boat



Train for Your Dream Job!
No HS Diploma/GED Required!
SD Does/SD Payments

Start Now! No Experience Necessary!
Grants/Financial Aid
(to those who qualify)
Flexible Schedules,
Placement Assistance

MEDICAL ASSISTANT
CUSTOMER SERVICE
ADMINISTRATIVE ASSISTANT
PATIENT RECEPTION
OFFICE MANAGER
MEDICAL BILLING



Call Now for a Free Career Skills Assessment!
Westgate Mall Campus - 508-584-9909
At Home Learning Also Available
www.sstrain.edu



MADE IN USA



Train for Your Dream Job!
Medical Careers
Start Today!



www.sctrain.edu 508-584-9909

30 x 88"
 qty 5

Train for Your Dream Job!

Placement Assistance Flexible Schedule
Hands-On Training Financial Aid




www.sctrain.edu 508-584-9909

21 x 72"
 qty 10



Job Number: 7496 Description: Sullivan & Cogliano - BROCKTON Client: Mark Geden Date: 6/4/09 Due Date: 6/4/09 Size: see above Quantity: see above Contact: Ken	<input type="checkbox"/> Approved to print as is <input type="checkbox"/> Approved to print with corrections noted Corrections: _____ Approved by: _____ Date: _____	Shipping Via: H: _____ L: _____ W: _____ Weight: _____	Shipping P.O.D Packed By: _____ Received by: _____ Print name: _____ Time: _____ Date: _____
---	--	--	--

The appearance of order screens may not match in color printed proof, since all materials are colorized differently. Paper colors differ most of an accurate representation of color. Mammoth Media will not be liable for any changes in color, and or perceived, from an online proof to final print.

3



6
COUNCIL ON OCCUPATIONAL EDUCATION

"Assuring Quality and Integrity in Career and Technical Education"

August 7, 2009

Mr. Clifford Lechtur
150 Belmont Court, #1
Brockton, MA 02301

Re: Sullivan and Cogliano Training Centers

Dear Mr. Lechtur:

In response to your letter of June 26, 2009 concerning the advertising of the Medical Office Assistant program at the Brockton, MA campus of Sullivan and Cogliano Training Centers, I contacted Ms Sheila Chapman, Vice President of the institution, and questioned her about the ads, copies of which you enclosed in your letter and which I copied and faxed to her. I also faxed to her a selection from the U.S. Department of Labor's *Directory of Titles* for the entry of "Medical Assistant." In referencing the DOT entry, I reminded Ms Chapman that the "Medical Assistant" program appearing on her institution's advertising was not a medical assistant program as may be understood by the general population. The program offered by Sullivan and Cogliano Training Centers is approved by our agency as a "Medical Office Assistant" program and should be advertised as such.

As you will see from the response submitted to the Council by Ms Chapman, the school has changed its advertising to correct the error from the previous listing. I also advised Ms Chapman that it was incumbent on the institution to inform new students of the nature of the Medical Office Assistant program in order to avoid confusion between "medical office assistant" and "medical assistant."

Thank you for bringing this incident to the attention of the Council.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Wittig'.

Alex Wittig
Associate Executive Director

C: Ms Shiela Chapman

Enclosures

4

TRAIN FOR YOUR DREAM JOB!

**START NOW and GET CERTIFIED
in JUST WEEKS!**

**CALL NOW
1.888.TRAIN.77**

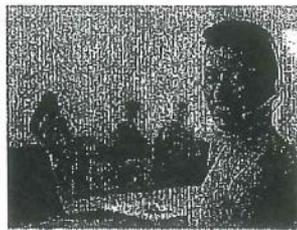
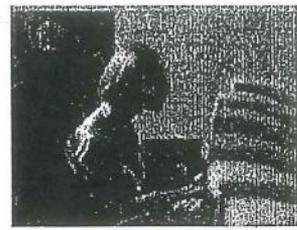


BUS AD Expanded

- **Medical Assistant**
- **Customer Service**
- **Accounting Assistant**
- **Administrative Assistant**
- **Office Manager**
- **Help Desk / A+**
- **Billing and Coding**

Flexible Schedules Placement Assistance

SULLIVAN



TRAIN FOR CAREERS IN...

- Medical Assistant
- Customer Service
- Accounting Assistant
- Administrative Assistant
- Office Manager
- Help Desk/A+



**Start NOW and Get
CERTIFIED in Just WEEKS!
12,000 Graduates did.
YOU DESERVE IT TOO!**



No HS Diploma/GED Required!

Grants/ Financial Aid/ \$0 Down/\$0 Payments (to those who qualify)

Flexible Schedules, Placement Assistance

Call Now for a Free Career Skills Assessment

888.TRAIN.77 www.sctrain.com

(87246)

Emp Guide 2007

Train for Your Dream Job!

Start NOW and Get CERTIFIED in JUST WEEKS!

12,000 Graduates did.
YOU DESERVE IT TOO!

No HS Diploma/GED Required!
\$0 Down/\$0 Payments

Grants/ Financial Aid
(to those who qualify)

Flexible Schedules,
Placement Assistance

- MEDICAL ASSISTANT
- CUSTOMER SERVICE
- ADMINISTRATIVE ASSISTANT
- PATIENT BILLING
- HELP DESK
- MEDICAL BILLING
- OFFICE MANAGER



Call Now for a Free Career Skills Assessment

Westgate Mall Campus

508-584-9909

www.sctrain.edu



Job Number: 5172
Description: Sullivan & Cogliano
Client: Mark Geden
Date: 10/3/08
Due Date: 10/12/08
Size: 72" x 21"
Quantity: 5
Contact: Ken

2008

DIRECT MEDIA OUTDOOR ADVERTISING SINCE 1992

Approved to print as is Approved to print with corrections noted

Corrections: _____

Approved by: _____ Date: _____

The appearance of color on screen may not match the final printed piece, since all monitors are calibrated differently. Paper proofs offer more of an accurate representation of color. Mammoth Media will in no way be liable for any changes in color, real or perceived, from an online proof to final print.

5

Sullivan and Cogliano Training Centers provides the skills necessary to compete in today's business environment. Our well established, long-term relationships with nationwide employers keep us current with any new trends in the changing job market. Our goal is pure and simple-to-provide career-ready training that leads to meaningful employment.

We offer:

- ◆ the highest quality certificate-awarded office, IT and medical training in the most efficient and effective manner possible;
- ◆ a learning environment that considers the unique needs of students, including flexible scheduling with day and evening classes;
- ◆ courseware which reflects the current requirements of the workplace;
- ◆ all programs approved for Workforce Training Funds;
- ◆ Federal Financial Aid to those who qualify



Medical Office Assistant
 Medical Billing and Coding
 Medical Transcription
 Medical Insurance Processing
 Office Professional
 Help Desk Professional
 MCSE (Microsoft Certified Systems Engineer)
 MCSA (Microsoft Certified Systems Administrator)



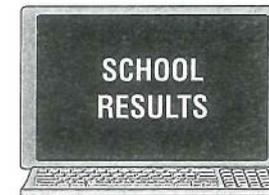
Medical Office Assistant
 Accounting Assistant
 Help Desk Professional
 Medical Transcriptionist
 Medical Billing and Coding
 Systems Administrator



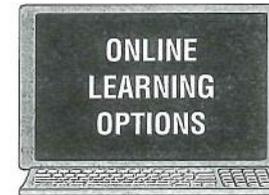
1.888.TRAIN.77



www.sctrain.edu



12,000 Graduates
 90% Government Tuition Assisted
 94% Average Test Score
 85% Placement Rate ←
 Nationally Accredited
 Federal Title IV Financial Aid



Anytime, Anywhere
 Web Based Support
 Section 30 Approved
 Step-by-Step Learning Guide
 Available For All In-School Programs
 Fully Interactive Learning Experience
 Microsoft and CompTia Approved Materials

TRAIN FOR YOUR DREAM JOB TODAY!



Secure Your Quality of Life! Train For Your DREAM Job!

**NO HS DIPLOMA OR
GED REQUIRED!**

**Start NOW and Get CERTIFIED
in Just WEEKS!**

**12,000 Graduates did.
YOU DESERVE IT TOO!**

- Medical Office Assistant
- Administrative Assistant
 - Customer Service
- Medical Transcription
- Accounting Assistant
 - Medical Billing

**Grants/Financial Aid
\$0 Down/\$0 Payments
(to those who qualify)**

**Flexible Schedules
Placement Assistance**

**CALL NOW!
1.888.TRAIN.77**

460 Belmont Street
Brockton, MA 02301
508.584.9909

7740 N. Kendall Drive
South Miami, FL 33156
305.279.5877

4760 NW 167th Street
North Miami, FL 33014
305.624.3030

Online Learning Options Available

www.sctrain.edu

**Providers of Career Services
Since 1993**



TRAINING CENTERS

1.888.TRAIN.77

www.sctrain.edu

Read what some of our students think of our programs!

"After having been a stay-at-home mom for 3 1/2 years, I decided that it was time for me to update my computer skills in order to re-enter the workforce. I had interviews with several schools, but chose Sullivan and Cogliano Training Centers for the following reasons:

- Convenient Location
- Course Curriculum
- Extremely flexible hours
- Affordable courses
- Placement Assistance

What I have learned is amazing!"
- Lisa Laranjo

"Thank you for taking discouraging employment situations and turning them into wonderful opportunities for the future with your training concept and the unfailing support, encouragement, and respect that your staff provides. I congratulate Sullivan and Cogliano on this winning combination."
- Anita Lamothe

9

Call Today!
1-888-872-4677

- [Home](#)
 - [FAQ](#)
 - [History](#)
- [Training Programs](#)
 - [Medical Office Assistant](#)
 - [Office Professional](#)
 - [Information Technology](#)
 - [Microsoft Office Specialist](#)
- [Career Services](#)
 - [SC Employer Center](#)
 - [SC Career Advisor](#)
- [Financial Aid](#)
- [Testimonials](#)
- [Military](#)
- [News & Events](#)
- [Contact Us](#)
 - [North Miami, FL Campus](#)
 - [South Miami, FL Campus](#)
 - [Brockton, MA Campus](#)
 - [Online Training](#)
 - [International](#)
 - [Join Our Team](#)

Press Release

Sullivan and Cogliano Training Centers, Inc. Expands its Career Ready Training Centers in Miami, FL and Brockton, MA

SULLIVAN AND COGLIANO TRAINING CENTERS, INC., A NATIONAL COMPUTER AND CAREER READY TRAINING COMPANY CONTINUES ITS AWARD WINNING PACE EARNING FOUR PRESTIGIOUS RECOGNITIONS:

- Number 1 in Training Related Placement in Miami Dade for period ending 6/30/09
- Best Places to Work by the Prestigious Boston Business Journal for 2009-2011
- Best Places to Work by the Prestigious South Florida Business Journal for 2011
- 2011 Inc. 5000

The training and employment market continues to benefit with computer and career-ready training and placement assistance with over 12,000 graduates and a nearly 85% placement rate produced by Sullivan and Cogliano Training Centers since its inception in 1993!

Miami, FL and Brockton, MA, February 1st – Herb Cogliano, President of Sullivan and Cogliano Training Centers, Inc., announces his career-ready computer training center continues to strive for excellence in both training and placement assistance and is pleased to earn the Number 1 training related placement status in Miami-Dade county, according to the South Florida Workforce Reconciliation dated 6/30/09 and in addition was voted as winner by both the Boston Business Journal and the South Florida Business Journal as one of the “best places to work.” Accredited by the Council on Occupational Education, COE, www.council.org, says Cogliano, “We are extremely happy for these wonderful reinforcements of our growing business. Our continued growth is part of our plan to offer much-needed computer and career training in the areas of Medical Administration, Customer Service, Accounting and Information Technology to both job seekers, employed and underemployed workers in order for them to enhance their self-sufficiency.”

In 2005, Sullivan and Cogliano Training Centers, Inc. was highly recognized by the Council on Occupational Education based upon its qualitative and quantitative performance. This significant expansion enables incoming students to now apply for a variety of federal and state grants, including financial aid, in order to attend our training centers. Our mission is to improve the quality of life by meeting people at life’s crossroads and provide paths to meaningful employment. This growth will continue to extend our services to those who need it most and who may not be able to fund their education without financial assistance.

The National Training Centers expand a long Sullivan and Cogliano tradition for market-responsive, industry-focused human resource services. Sheila Chapman, National Vice President, says, “People come to us needing immediate training in order to find employment as quickly as possible, and we won’t stop working until our students are working. New classes start every day so no one has to wait for a semester to begin. Our goal is to provide quality training quickly and effectively, and because we have a strong employer base from our staffing service business, we continue to develop appropriate curriculum based on job market demand.” Chapman, in her 25 years with the company, possesses both staffing and training leadership experience. “We know which skills are the most popular and will create job opportunities and career advancement. Our curriculum will continue to reflect the needs of the local business community. It’s our passion to know how to give students the training they need for the career they deserve!”

Nancy Rodriguez, a native of Miami and the Vice President of National Operations for Sullivan and Cogliano Training Centers, says, “Our focus is simple ... identify the career goals of each person, train them to reach those goals, and then help them through our thorough placement process to

secure employment.” Nancy celebrates her fourteenth year successfully focused on this goal and is an integral part of the Miami-Dade employment and training market.

Located at 4760 NW 167 Street and 7740 N Kendall Drive in Miami, Florida and 460 Belmont Street, Brockton, Massachusetts along with a myriad of online students throughout Florida and Massachusetts, Sullivan and Cogliano Training Centers operates under license from the Commission for Independent Education, Department of Education, and is an approved training agent both for the Florida and Massachusetts Workforce, Vocational Rehabilitation, Refugee Employment and Training, Veterans Benefits and Federal Title IV Financial Aid.

For more information please contact:
Sullivan and Cogliano Training Centers, Inc. at 1-888-TRAIN-77 or visit us at www.SCTRRAIN.edu

REQUEST Free Information

*First Name

*Last Name

*Email Address

*Telephone

* Zip Code

*Closest Location

Select one *Desired Career

Select one

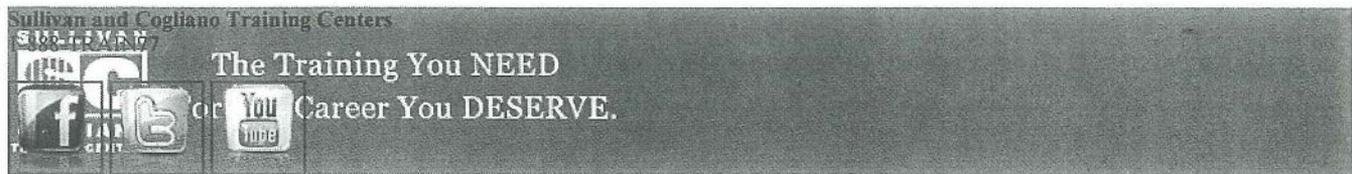
Follow Us Online!



A Few Employers Who Hire Our Graduates

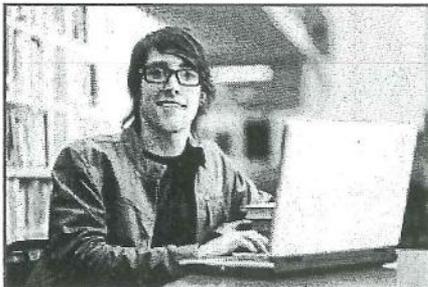


© Copyright Sullivan and Cogliano Training Centers, Inc. 2013. All Rights Reserved



- [Home](#)
- [About](#)
 - [FAQ](#)
 - [History](#)
 - [Press Release](#)
- [Programs](#)
 - [Medical Office Assistant](#)
 - [Office Professional](#)
 - [Information Technology](#)
 - [Microsoft Office Specialist](#)
 - [English as Second Language](#)
- [Career Training Locations](#)
 - [North Miami, FL Campus](#)
 - [South Miami, FL Campus](#)
 - [Brockton, MA Campus](#)
 - [Online Training](#)
 - [International Students](#)
- [Career Services](#)
 - [SC Employer Center](#)
 - [SC Career Advisor](#)
- [Financial Aid](#)
- [Success Stories](#)
- [Contact Us](#)
 - [Apply Online](#)
 - [Join Our Team](#)

About Our Career Training Centers



Our Florida and Massachusetts career colleges focus on offering a more effective way to train – a method that allows you to work to your strengths and at your own pace. No matter what your current computer or skill level – no computer or special skills needed – we can help you get started. Our unique training system offers the benefits of:

- Customized training plans
- 100% hands-on training
- Learning at your own speed with certified instructors
- Flexible class schedules
- Open enrollment
- Lifetime Partnership program
- Career skills
- [Placement assistance](#)
- [Online training](#)

Our core purpose is to change people's lives. **We recognize the most effective way to impact individuals is to meet people at life's crossroads and provide paths to meaningful employment.** This is our passion for our students which we deliver daily through our core values of integrity, achievement, innovation and teamwork.

Our programs are designed for people who want to enhance their lives through increased confidence propelling them into well-paying and meaningful careers. Since our inception in 1993, we have:

- Graduated over 12,000 career-ready students
- Placed over 85% of graduates
- Produced a 94% student grade point average
- Achieved an 85% graduation rate

- Received a 95% student survey satisfaction rate

Get the training you're looking for, faster than you might think! With the Sullivan and Cogliano Training Centers system, you take the classes you need at the time and pace that's right for you. And there's no waiting for a new semester – you can start right now! [Contact us for more information](#) or call us at 1.888.TRAIN.77.

Request FREE Information

*First Name

*Last Name

*Your Email

*Telephone

*Campus of Choice

Program of Interest



Sullivan & Cogliano Training Centers on Facebook



Sullivan & Cogliano Training Centers

<http://www.sctrain.edu/success-stories/shannon-sanders-miami-medical-coding-billing-student/>



Shannon Sanders - Medical Coding & Billing Student
www.sctrain.edu

Check out our interview with Shannon

485 people like **Sullivan & Cogliano Training Centers**.

 Stephanie	 Donna	 Justine	 Andre	 Cahleen
 Maryjane	 Aranda	 Laura	 Shawn	 Annette

- [About](#) |
- [Career Services](#) |
- [Programs](#) |
- [Financial Aid](#) |
- [Locations](#) |
- [Contact Us](#) |
- [Blog](#)

7

MOA Placements In Medical Offices

Job Title	Employer
Customer Service Rep.	Blue Cross/Blue Shield
Office Assistant	Bay State Physical Therapy
Medical Secretary	South Shore Medical Ctr.
Unit Secretary	Greater New Bedford Health Center
Personal Service Representative	Aspen Dental
Medical Transcriptionist	SRTS, Inc.
Nurse's Asst/Unit Coordinator	South Shore Hospital
Clerical	South Bay Mental Health
Representative I	Blue Cross/Blue Shield
Medical Biller/Admin	South Bay Mental Health
Patient Scheduler	Tufts Medical Center
Medical Biller	U.S. Laboratory
Medical Administrator	Dr. Paulson
Administrative Assistant	Steppingstones, Inc.
Receptionist	Associates for Human Services
Unit Coordinator	South Shore Hospital
Secretary	Pediatric Associates of Brockton
Medical Admin.	Growthway's, Inc.
Clerical	Doctor's Management Service
Pharmacy Tech	Boston Medical Assoc.
Medical Biller	E- Practice Solutions
Supervisor	Erickson/Linden Pond
Administrative	Kindred Healthcare
Chiropractic Assistant	Brockton Spine

OP Medical Placements in Medical Offices

Job Title	Employer Name
Registration Clerk	Brockton Neighborhood Health
Pharmacy Service Associate	CVS
Medical Collections	CCA
Member Services Rep	Blue Cross/Blue Shield
Admin.	Dr. Bill Vagenas
Account Manager	Insurance Services of NE
Customer Care Rep	CCA Healthcare
Lab Specimen Tech/Data Entry	Memorial Hospital
Office	Arbour Counseling Services
Debt Collector	EOS CCA
Office Assistant/ Back up Biller	North East Health Services
Case manager	Cambridge Health Alliance
Medical Collections Specialist	EOS CCA
Medical Billing Associate	Planned Parenthood
Medical Billing	BayState Chiropractic
Prior Authorization Rep.	Atlantic Home Medical Supplies
Receptionist	Brockton Chiropractic
Billing Support	South Bay Mental Health
Medical Claim Denials	Pharmerica
Billing Clerk	Dorchester House
Patient Care Asst.	Brigham and Women's Hosp.
Program Assistant	WIC Framingham
Admin. Asst.	BAMSI
PC Technician	American Renal
Pharmacy Service Assoc.	CVS Pharmacy
Admin. Asst.	South Bay Mental Health
Dental Billing	Mattapan Community Health Ctr.
Receptionist	Dental Dream
Collections Specialist	EOS-CCA
Medical Biller	U.S. Labs
Admin. Asst.	South Bay Mental Health
Accounts Receivable Clerk	U.S. Laboratory
Medical Receptionist	Siskind Chiropractic
Pharmacy Tech	CVS Pharmacy
Schedule Coordinator	Small Smiles

8

**MOA Placements in Child Care/ Education,
Manufacturing/Transportation/Security/Manual Labor/Custodial,
Restaurant/Hospitality Services, Retail/Sales/Telemarketing**

Job Title	Employer
Child Care/Education	
Student Services Rep	Sullivan & Cogliano
Pre-K teacher	Curious Kids
Career Services Asst.	Sullivan and Cogliano
Online Academic Counselor	Sullivan and Cogliano
Financial Aid Asst.	Sullivan and Cogliano
Pre-School Teacher	Diane King Daycare
Manufacturing/Transportation/Security/Manual Labor/Custodial	
Estimator	VSB Contracting
Manufacturing/Medication Labeler	Braintree Lab
Assembler	Electrochem
Package Handler	UPS
Housekeeper	Sunshine Cleaning Co.
Restaurant/Hospitality Services	
Receptionist	Hotel Indigo
Waitress	O'Charleys Inc.
Customer Service	Dunkin Donuts
Waitress/Bartender	The Red Rose Inn and Tavern
Waitress	Fen Shai
Customer Service Rep.	Wendy's
Hostess	Proprietor's Green
Flight attendant	Jet Blue Airlines
Customer Service	Dunkin Donuts
Retail/Sales/Telemarketing	
Teller	Citizen's Bank
Customer Service	Job Lot
Customer Service Rep	Wal-Mart
Customer Service	Dollar Tree
Customer Service Rep.	Hyde Park Savings
Customer Service	Target
Customer Service Rep.	Burke Distributors
Call Center Rep.	Basement Technologies
Customer Service/Sales	Dots
Customer Service Assoc.	Walgreen's
Merchandiser	Savers
Clerk 3rd Position	Supervalu Companies & Albertsons, LLC
Sales	South Shore Auto Lines
Customer Service	Dots
Cashier	Save A Lot
Customer Service Rep.	Best Buy

MOA Placements in Child Care/ Education,
Manufacturing/Transportation/Security/Manual Labor/Custodial,
Restaurant/Hospitality Services, Retail/Sales/Telemarketing

Data Entry	L&M Bargain
Customer Service	Boston Apparel
Self-employed	Mary Kay - Independent Consultant
Customer Service/Data Entry	Metro PCS
Office Admin/ Pro Shop Coordinator	Southers Marsh Golf Course
Customer Service	A.J. Wright
Customer Service	BJs
Check-out Service Assoc.	Sears Holding Co.
Recruiter	Cunningham Marketing
Sales Clerk	Eaton Apothecary
Customer Service	Hannaford's Foods
Telemarketer	Adecco Staffing
Independent Consultant	Avon
Mortgage Clerk	Mergis Group
Customer Service/Data Entry	Specialty Catalogue Corp.
Customer Service Representative	Trucchi's Market
Sales Associate	Macy's
Independent Sales Person	Vector
Office Associate	Home Depot

**OP Medical Placements in Child Care/ Education,
Manufacturing/Transportation/Security/Manual Labor/Custodial,
Restaurant/Hospitality Services, Retail/Sales/Telemarketing**

Job Title	Employer
Child Care/Education	
Day Care provider	Florine Toussant - Flowing Daycare
Self-Employed	Mildred Aponte
Assistant Teacher	Brockton Day Nursery
Appointment Setter	Sullivan and Cogliano
Job Developer	Sullivan and Cogliano
Teacher's Aid	South Bay Early Intervention
Manufacturing/Transportation/Security/Manual Labor/Custodial	
Department Head	Lehi Sheet Metal
Security	Gillette Stadium
Handler	FedEx Express
Housekeeping Supervisor	Resorts Casino
Driver	His dad's cab company
Rooting Coordinator	YCN Transportation
Driver	VHS Transportation
Special Task	Direct Tech Northeast
Craft Worker Skilled	Wal-Mart
Driver	Ceng's House
Security	Securitas
Housekeeper	West Western Hotel
Driver	Rentals Unlimited
Machine Operator	Manpower
Custodian	Brockton Housing Authority
Restaurant/Hospitality Services	
Waitress	Christo's Restaurant
Food Services Registration	Brockton Food Services
Customer Service	Bridgewater State College
Counter Help	Kyrdino's Pizza and Calzones
Shift Supervisor	Papa Gino's
Service Worker	Friendly's
Customer Service	TGIF
Certified Aerobic Instructor	The Inn Fitness Club
Retail/Sales/Telemarketing	
Sales/Independent Rep.	Vector
Clerk	Stop & Shop
Customer Service	Dunkin Donuts
Customer Service	K Mart
Customer Service	Target
Customer Service	Walmart
Pricing Coordinator	Cumberland Farms
Cashier	Dunkin Donuts
Department Manager	Job Lot
Consultative Sales Trainee	Sear's Holding Company

OP Medical Placements in Child Care/ Education,
Manufacturing/Transportation/Security/Manual Labor/Custodial,
Restaurant/Hospitality Services, Retail/Sales/Telemarketing

Office Assistant	Bobs Discounts
Cashier	Sears
Customer Service	Subway and Walmart
Sales	Blue Wire
Manager	Lucky Brand
Customer Service	Sakoffs
Sales	Walmart
Cashier/Sales Rep.	Ann & Hope Curtain & Bath
Customer Service Rep.	Casual Male
Service Desk Associate	TJX Companies
Sales	Cutco Cutlery
Estimator	Home Depot
Merchandise Assoc.	TJ Maxx
Telecruiter	American Red Cross
Sales Associate Call Center	Specialty Catalogue
Customer Service	Dunkin Donuts/Mobil
Sales person	Work Out World
Service Assistant	Family Dollar
Clerk	Shaws
Assistant Manager	Team Spirit
Customer Service	Burger King
Customer Service	Wal-Mart
Customer Service	Dunkin Donuts
Customer Service	Dunkin Donuts
Client Development	Safeguard
Crew Member	Classie Canines
Sales Cashier	Aunt Annie's Pretzels
Telemarketing Associate	Specialty Catalogue Corp
Clerk	Shaws
Shift Supervisor	CVS Pharmacy
Sales Associate	Christmas Tree Shops
Salesperson	Toyota