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**ELECTRONICALLY  
FILED**  
*Superior Court of California,  
County of San Francisco*  
**03/15/2016**  
**Clerk of the Court**  
BY: CAROL BALISTRERI  
Deputy Clerk

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF SAN FRANCISCO  
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13 THE PEOPLE OF THE STATE OF  
14 CALIFORNIA,

Plaintiff,

15  
16 v.

17 HEALD COLLEGE, LLC; Et. Al.  
18

Defendants.  
19

Case No. CGC-13-534793

**DECLARATION OF  
HOLLIE HARSH**

Dept: 304  
Judge: The Hon. Curtis E.A. Karnow

Action Filed: October 10, 2013  
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1 heated from a propane gas source and used it to wash ourselves. Sometimes we were invited by  
2 fellow students to use the bathrooms in their homes.

3 6. We had to complete all of our studies and homework in the Heald campus computer lab  
4 as we had no electricity in our tent. I had very little money on which to live. One of the sources  
5 of funds on which I relied came from the money I borrowed from the student loan program which  
6 was not entirely dispersed to Heald. For each of the three and one half quarters that I attended I  
7 received between \$600 and \$1200 from these borrowed funds.

8 7. I also was able to get a work-study job on campus in the Academics office. It was  
9 because of my work in this office that I learned that the credits I was earning at Heald were not  
10 automatically transferable to other colleges and that I had been deceived by the admissions  
11 counselor.

12 8. One of the classes I took in the Business Entrepreneur program included material about  
13 getting investors to invest in me and my business. One of the things I learned was that these  
14 potential investors would run a background check on me. I became concerned that if such a  
15 check were made, a potential investor would learn of my felony record and would not want to  
16 invest their money in my restaurant. I feel that Heald should have told me about the background  
17 check issue prior to enrolling me in the program.

18 9. After completing three quarters and about a half of a fourth, the stress of my living  
19 situation (at this time we were now living in a recreation vehicle) took a toll on my health.  
20 Coupled with what I found out about transferring credits and background checks, and my poor  
21 grades due to a lack of support, I was forced to withdraw rather than continue in a program that  
22 would not get me a job or provide me with transferable credits.

23 10. I am now in debt to the federal government for student loans in the amount of \$15,000  
24 for credits that I can't transfer and education that won't help me start my own business. I am not  
25 employed, and currently my loans are in forbearance. Shortly after I left Heald I  
26 received a bill from them stating I owed them \$500. With great difficulty, I paid that bill in  
27 amounts that ranged from \$25 to \$50 each month. I do not know how I will ever be able to repay  
28 this student loan. I now believe that I was taken advantage of and given false hope by Heald just

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so that I would enroll in their school.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 12, 2014.



HOLLIE HARSH