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14 CA 15 16 17	HE PEOPLE OF THE STATE OF ALIFORNIA, Plaintiff, v. EALD COLLEGE, LLC; Et. Al. Defendants.	DECLARATION OF HOLLIE HARSH Dept: 304 Judge: The Hon. Curtis E.A. Karnow Action Filed: October 10, 2013
	DECLARATION OF HOLLIE HARSH (CGC-13-534793)	

DECLARATION OF HOLLIE HARSH

I, Hollie Harsh, declare as follows:

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1. I have personal knowledge of the matters set forth below.

2. In April of 2012, my fiancé, Brian French, and I were homeless and living in a tent on vacant land in Pittsburg, California. Neither of us were employed. During that month someone contacted us by phone in response to a request for information about attending college that had been submitted online. On that phone call, we were offered a monetary incentive if we toured several college campuses. One of the colleges on the list was Wyotech, but the campus location was not convenient for us. Another was Heald College in Concord. Brian and I agreed to visit Heald in Concord.

- 3. In April of 2012, I met with an admissions representative at the Concord campus. I told this representative that I was living in a tent, was not employed, and that I had been convicted of a (non drug related) felony. After some discussion about my possible interest in some day owning a restaurant, it was suggested that I should get a degree in Business with a focus on being an entrepreneur. During the admissions process, I was told that the credits I would earn at Heald were automatically transferable to other colleges. I was also promised that my education would help me achieve my dream of opening a restaurant. I filled out all the required paperwork to enroll in the school. For an address I provided a location in Antioch, California that serves as place where homeless people can pick up mail. My fiancé, Brian, also enrolled that day in their IT program. He too has a felony conviction which he disclosed to Heald.
- 4. On the same day I enrolled at Heald I also filled out the FAFSA and learned I had been approved for federal student loans.
- 5. The day before classes started at Heald, we moved our tent to an empty field across the street from the Heald campus. About two weeks later a Sheriff Deputy told us we had to leave. We packed our tent and belongings and moved them to an area on the Heald campus near the outdoor recycle bins. We popped up our tent at night and took it down in the morning. We lived in this tent on campus for about two months with the knowledge of the campus President. At times we ate in the cafeteria on campus. At times we filled a five gallon jug with water we

heated from a propane gas source and used it to wash ourselves. Sometimes we were invited by fellow students to use the bathrooms in their homes.

- 6. We had to complete all of our studies and homework in the Heald campus computer lab as we had no electricity in our tent. I had very little money on which to live. One of the sources of funds on which I relied came from the money I borrowed from the student loan program which was not entirely dispersed to Heald. For each of the three and one half quarters that I attended I received between \$600 and \$1200 from these borrowed funds.
- 7. I also was able to get a work-study job on campus in the Academics office. It was because of my work in this office that I learned that the credits I was earning at Heald were not automatically transferable to other colleges and that I had been deceived by the admissions counselor.
- 8. One of the classes I took in the Business Entrepreneur program included material about getting investors to invest in me and my business. One of the things I learned was that these potential investors would run a background check on me. I became concerned that if such a check were made, a potential investor would learn of my felony record and would not want to invest their money in my restaurant. I feel that Heald should have told me about the background check issue prior to enrolling me in the program.
- 9. After completing three quarters and about a half of a fourth, the stress of my living situation (at this time we were now living in a recreation vehicle) took a toll on my health. Coupled with what I found out about transferring credits and background checks, and my poor grades due to a lack of support, I was forced to withdraw rather than continue in a program that would not get me a job or provide me with transferable credits.
- 10. I am now in debt to the federal government for student loans in the amount of \$15,000 for credits that I can't transfer and education that won't help me start my own business. I am not employed, and currently my loans are in forbearance. Shortly after I left Heald I received a bill from them stating I owed them \$500. With great difficulty, I paid that bill in amounts that ranged from \$25 to \$50 each month. I do not know how I will ever be able to repay this student loan. I now believe that I was taken advantage of and given false hope by Heald just

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