

Affidavit of [REDACTED]

[REDACTED] being duly sworn, deposes and says:

**About Me**

1. I am 31 years old. I live in Queens, NY.
2. I submit this affidavit in support of my borrower defense to repayment application of my federal student loans, obtained to pay for my attendance at ASA College.
3. I was born in New Jersey and lived there until I was 13 years old when my family moved to Pakistan. I completed my secondary education in Pakistan and moved back to New Jersey after graduating.
4. I attended ASA College from approximately May 2018 to February 2019 at the campus located in New York, New York, incurring approximately \$12,500.00 in federal student loan debt.

**Enrollment at ASA**

5. I became interested in continuing my education and attending nursing school after I moved back to New Jersey. I considered nursing programs at several schools in the CUNY system. I moved to New York City shortly after being enrolled into ASA College.
6. I discovered ASA College via internet search. After visiting their website one time, I began to receive persistent online advertisements from the school.
7. I was attracted to ASA College because of the “accelerated” nursing program that was advertised on their promotional materials. I thought an accelerated nursing program would be good for me because it would allow me to obtain the degree I needed quickly so that I could begin working as a nurse as soon as possible. ASA’s ads claimed that these credits were easily transferrable to a 4-year bachelor’s degree program if I wanted to continue my education.
8. I called the phone number listed on the ads to ask for more information about their nursing program. The administrator I spoke to on the phone told me that if I wanted to enroll in the Nursing program then I had to come to ASA to speak with the Director of Enrollment, Robert Nazar.
9. After the initial phone conversation, I went to ASA’s campus in Manhattan to speak with Robert Nazar and obtain more information about the Nursing program.
10. During that conversation, Mr. Nazar told me that the accelerated nursing program at ASA would help me to secure employment as a nurse after I graduated. Mr. Nazar told me that

ASA had connections with various hospitals and that if I worked hard at my studies then I could be successful. I understood him to mean that I was basically guaranteed a job after graduation.

11. I enrolled at ASA College specifically on the basis of the conversation I had in-person with Mr. Nazar and the advertisements I saw about ASA.
12. Based on what Mr. Nazar told me, I believed that I was enrolling in the Nursing program at ASA College. Mr. Nazar told me that I could complete a few nursing pre-requisite classes at ASA while I studied for the National League of Nursing (NLN) entrance exam.
13. However, the administrators at ASA enrolled me in a Medical Coding & Billing certificate program instead of the Nursing program.
14. I found out that I was not enrolled in Nursing after my first semester of study at ASA College when the administrators informed me that I was expected to continue taking Medical Coding & Billing classes the following semester. I questioned why I was enrolled in Medical Coding & Billing instead of Nursing. Mr. Nazar told me that students at ASA could only take the classes offered by their program of study so this was the only way I could take the pre-requisite classes for nursing. This was not what I was led to believe when I initially enrolled. Mr. Nazar also told me that these credits would be transferrable to Nursing, but this also turned out to not be true.
15. I had been honest with ASA from the beginning, my intention was to pursue nursing. They told me that I was enrolling in the nursing program, but that was not true. Instead of providing me with a path to pursue the degree I wanted, they tricked me into enrolling in an unnecessary program and taking out thousands of dollars of federal loans.
16. Mr. Nazar stated that the pre-requisite classes I needed to take next semester were only offered under the Medical Assisting program, and that I would have to change my program of study. In my second semester at ASA College, the administrators enrolled me in the Medical Assisting program so that I could continue taking nursing pre-requisites.
17. In my third semester at ASA, the administrators enrolled me in Health Information Technology.
18. During this time, I repeatedly told the administrators I had enrolled in the nursing program and wanted to be taking nursing classes. I repeatedly took the National League of Nursing (NLN) and obtained multiple scores that ASA considered to be “passing” which should have allowed me to take nursing classes instead of prerequisites. However, each time, ASA told me that I had to continue in the prerequisite programs of Medical Coding & Billing, Medical Assistant, and Health Information Technology.
19. Each time I received my NLN score ASA claimed that the criteria had changed and my score was not good enough to start taking Nursing classes. The school failed to provide

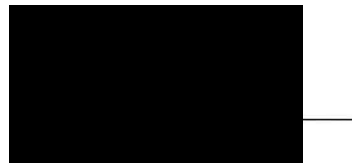
resources to support students to study for and pass the minimum score for their Nursing program. The administrators at ASA used my test scores to pressure me to stay in the Medical Coding & Billing, Medical Assistant, and Health Information Technology classes that they enrolled me in.

My best guess is that ASA did not have enough spots in the nursing classes for the number of students that it promised could enroll in the nursing program, so that it forced people like me to take unnecessary courses that it claimed to be prerequisites so that students could remain enrolled at ASA.

**Additional Harm I Experienced at ASA**

- 20. Around this same time, I heard from my friend that the nursing class professors were terrible and there were allegations of sexual harassment by various students. I left ASA College because the school never even let me take nursing classes. I felt that everything I had been told to get me to enroll had turned out to be a lie. My dream of studying nursing at ASA felt unattainable. Due to ASA changing my program of study each semester, after 3 semesters I had no degree nor certificate to show for my efforts.
- 21. Several months after leaving ASA College, I applied for admission to Mercy College. I was accepted and have since graduated with a Health Science Pre-P.A. Bachelor's degree. However, Mercy College only accepted a very small number of credits from the nursing pre-requisite courses I took at ASA. I had to completely redo many semesters I spent studying at ASA College, and now I have an additional \$12,500 in student loans from ASA.

I certify, under penalty of perjury, that the above statements are true and correct to the best of my knowledge and belief.



1/30/24  
Date

Sworn to before me this 30 day of  
January, 2024

Laura Waldman  
NOTARY PUBLIC

Laura Waldman  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01WA6433941  
Qualified in Queens County  
Commission Expires May 31, 2026