

Affidavit of [REDACTED]

[REDACTED] being duly sworn, deposes and says:

About Me

1. I am 39 years old. I live in Brooklyn, NY. I have one child.
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. From January 2004 to January 2006, I was enrolled in a Bachelor's of Accounting program at CUNY Lehman College. Due to economic hardship, I left school to work as a Payroll Administrator for several years.

Enrollment at ASA

4. In the fall of 2014, I became interested in returning to school to advance my career prospects. I planned to study nursing and work at one of the two hospitals near where I live. I considered nursing programs at several schools in the CUNY system, which I was already acquainted with, in addition to ASA College.
5. I first became aware of ASA College's Nursing program from the posters and advertisements I saw on New York City public transit.
6. 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 start working and earning income to support myself and my newborn baby.
7. I called the phone number listed on the Subway and Bus ads and the administrator who answered told me that if I wanted to enroll in the Nursing program then I had to come speak with the Director of Enrollment, Robert Nazar.
8. After the initial phone conversation, I went to ASA's campus in Downtown Brooklyn to speak with Robert Nazar and obtain more information about the Nursing program.
9. 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.
10. I enrolled at ASA College specifically on the basis of the conversation I had in-person with Mr. Nazar and the public transportation ads I saw about ASA.

11. I enrolled at ASA College in October 2014 and attended until May 2018 at the campus located in Brooklyn, New York, incurring approximately \$40,000 in federal student loan debt.
12. I believed that I was enrolling in the Nursing program at ASA College. Mr. Nazar told me that I had to complete some pre-requisite classes before I could begin nursing classes, and that I could complete these courses at ASA. The administrators at ASA enrolled me in a Medical Assisting program instead of the Associate's of Nursing program. Throughout my time at ASA College, I was never able to choose the courses, nor the program that I wanted to study.
13. I found out that I could not take Nursing classes after my first semester of study at ASA College when the administrators informed me that I was expected to continue taking Medical Assisting classes the following semester. I questioned why I was enrolled in Medical Assisting instead of Nursing.
14. Mr. Nazar told me that later on I could begin taking nursing classes. This was not what I was led to believe when I initially enrolled. Mr. Nazar convinced me that the classes that were offered under the Medical Assisting program would provide me with relevant knowledge to a career in nursing.
15. After I completed the Medical Assisting program, I believed that I could begin taking Nursing classes, as was my intention upon enrolling at ASA College. This turned out to not be true when I was informed by the administrators at ASA that the Nursing program was very competitive, all the slots in the program were filled, and there was a long waitlist to be admitted.
16. It was as if the school did not want students to enroll in Nursing. My best guess is that ASA promised many more people enrollment in its nursing program than there were available spots.
17. After I completed my Medical Assisting certificate, I considered leaving ASA College and attending a nursing program at a different school. However, when I requested an official transcript – which I needed in order to transfer my credits to another school – I was told that if I withdrew from ASA my financial aid would be rescinded and I would owe the school money. The administrators threatened that I would have to settle my accounts with the financial office before I would be allowed to receive my transcript. At the time, I did not have money to pay the school back, so I had to stay.
18. Through my own persistence, I was eventually allowed to begin taking Nursing classes. I had to interview with the Dean of the Nursing program who asked me many personal questions, that were irrelevant to my academic credentials. I was unaware of the criteria

that were being used to evaluate me for entry into Nursing classes since ASA had kept me in the dark for many semesters.

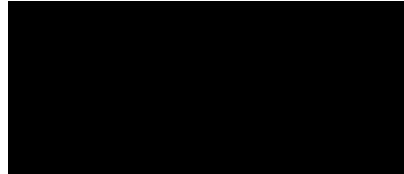
19. Once I started taking Nursing classes, I realized that ASA College had forced me into an entirely unnecessary program of study. I thought that my Medical Assisting classes were pre-requisites that would count towards Nursing, but this turned out to not be true. I was informed that I even had to retake some of the classes that I had already completed. If I had known this was the case, I would have never completed the Medical Assisting program.
20. I had been honest with ASA from the beginning that my intention was to pursue nursing. Instead of providing me with a path to pursue the degree I wanted, they tricked me into enrolling in an unnecessary and redundant program and taking out thousands of dollars of federal loans.
21. Eventually, in spring 2018, I left ASA College without completing my Nursing degree because ASA kept implementing obstacles to prevent me from fulfilling their requirements. It was as if they did not want students to complete their Nursing degree.
22. I was never able to enroll at a different school due to difficulties obtaining an official transcript from ASA. Presently, I think that many of my Nursing credits have expired so I would have to redo the entire program if I were to return to school. I worked as a secretary after I left ASA but I was laid off during the COVID-19 pandemic. My job prospects are no better than when I enrolled at ASA.

Additional Harm I Experienced at ASA

23. Additionally, ASA forbade me from working while I was studying Nursing. I had a brand-new Medical Assisting degree that I wanted to use to find employment so that I could earn a bit of income while I was in school and start paying back some of my student loans, but ASA informed me that I was not allowed to work. They said I could be expelled from the Nursing program if I was not entirely focused on my studies. Although I needed an income to support myself and my family I was worried about the repercussions if ASA found out. These experiences caused me significant stress and emotional harm.
24. On top of the financial harm I experienced from the unnecessary Medical Assisting degree I was forced to complete, I also experienced emotional harm from the racist conduct of one of my Nursing professors. A Microbiology professor repeatedly made racist remarks about Black people in class. When I raised a complaint about her to the school, she retaliated against me by giving me a failing grade. There were no other professors at ASA who taught that same subject, so I had to retake the class 3 times with the same professor who kept

failing me out of spite. I felt I was powerless and had no other recourse since my complaint to the school had only resulted in further backlash against me – a student of color. This was a motivating factor towards my decision to leave ASA College in Spring 2018.

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



02/06/24
Date

Sworn to before me this 6 day of
February, 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