

1 Michael Louis Kelly (SBN 82063)  
Behram V. Parekh (SBN 180361)  
2 Joshua A. Fields (SBN 242938)  
Amir D. Benakote (SBN 277158)  
3 **KIRTLAND & PACKARD LLP**  
2041 Roscrans Avenue, Third Floor  
4 El Segundo, California 90245  
Phone: 310.536.1000  
5 Facsimile: 310.536.1001

6 Ray E. Gallo (SBN 158903)  
Dominic Valerian (SBN 240001)  
7 Patrick V. Chesney (SBN 267587)  
**GALLO & ASSOCIATES**  
8 1101 Fifth Avenue, Suite 205  
San Rafael, CA 94901  
9 Phone: 310.338.1114  
Facsimile: 310.338.1199

10 *Counsel for Plaintiffs*

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **COUNTY OF LOS ANGELES**

13 DANIEL VASQUEZ; SUFYAN ABDELSHIFE;  
CHARLES ABRENICA; CINTHIA ABRICA;  
14 KEVIN ACEVES; HEATHER ACKERMAN;  
ERIC ADABKHAH; PRYSCILLA ADAME;  
15 ANGELA ADAMS; MELANIE ADAMS;  
AILEEN ADHAM; CYED ADRAINCEM;  
16 SUSANA AGREDANO; APRIL AGUILAR;  
CANDIDA AGUILAR; JAZMIN AGUILAR;  
17 MARIA JOSE AGUILAR; ISELA AGUIRRE;  
ANTONIO ALANO; VERONICA ALBERTO;  
18 CHERRY ALCALA; ALDRICH ALCANTARA;  
RICARDO ALCINA; ALAYNNE ALDAY;  
19 JOSEPHINE ALFORD; MEGAN ALLEN;  
KEVIN ALTAMIRA; JOHN ALTMAN;  
20 KARAPET ALTOUNIAN; EDSON ALVAREZ;  
EILEEN AMADOR; AMBER AMOS;  
21 ANTONIO ANDERSON; JUSTIN ANDERSON;  
SCOTT ANDERSON; HEATHER ANDRES;  
22 MARICAR ANGELES; MARKO ANGULO;  
HEATHER APOSHIAN; KENNETH ARANDA;  
23 YADIRA ARANDIA MARTINEZ; LUIS  
ARBAIZA; JEFF ARDI; TIFFANY ARECHIGA;  
24 SAMUEL ARELLANO; SHEILA  
ARENSDORF; EDWARD ARGUELLES;  
25 ANDRES ARIAS; ANNEL ARIAS; ELENA  
ARMENDAREZ; GEOFFREY ARMSTRONG;  
26 ALFONSO ARROYO; MICHAEL ARTUS-  
COOPER; STACY ASHBURN; KYLE AU;  
27 STACEY AUSBY; DIANE AVEYTIA; DORA

**CONFORMED COPY**  
**ORIGINAL FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

**JUN 15 2012**

John A. Clarke, Executive Officer/Clerk  
By: C. Concepcion

Case No. BC393129

Assigned to the Hon. Jane L. Johnson  
Dept. 308

[Consolidated with BC459917, BC463344,  
BC467048, BC470851, BC474275,  
BC477920, BC480905, EC055672]

**CONSOLIDATED AMENDED  
COMPLAINT:**

1. FRAUD
2. VIOLATION OF THE UNFAIR  
COMPETITION LAW
3. VIOLATION OF THE CONSUMERS  
LEGAL REMEDIES ACT
4. VIOLATION OF THE PRIVATE  
POSTSECONDARY AND  
VOCATIONAL EDUCATION  
REFORM ACT OF 1989
5. BREACH OF CONTRACT

**DEMAND FOR JURY TRIAL**

**BY FAX**

1 AVILA; ANDREA AVINA; ELMER AXUME;  
2 AMY BADAWI; MELANNIE BAEDOR; JIN  
3 BAEK; RAYMOND BAKER, JR.; TIFFANY  
4 BANKS; ANTHONY BANUELOS; VANESSA  
5 BANUELOS; DARREN BARBER; CELESTE  
6 BARRIOS; REBECCA BARTER; SOHAIL  
7 BASHIRIAN; CHRISTOPHER BATES;  
8 LUSWIN BAUTISTA; CHRISTINE BEADLE;  
9 PAUL BECERRA; TANYA BEEBE; KATLYN  
10 BEGGS; OSCAR BEJARANO; MELISSA  
11 BENDIG; NATALY BENTON; JOSHUA  
12 BERENGUEL; HALEY BERGER; SARAH  
13 BERKEFELD; ANNA BERKOWITZ; HANNAH  
14 BERLEY; JASMINE BERMUDEZ; FREDDY  
15 BERNABE; MICHAEL BERRY; NICK  
16 BESWICK; JON BILLINGS; SYLVIA BLAIR;  
17 THADDEUS BLANTON; PATRICK  
18 BLEEMERS; JOHN BOGATZ; CHRISTIAN  
19 BOLANOS; ROLAND BOMBANE; JASON  
20 BONAGA; ERIC BONILLO; CHRISTOPHER  
21 BOOKER; ROSAURA BORGES; ANNIKA  
22 BOUCARD; CANDICE BOWKER; EVAN  
23 BRANNING; ASUZENA BRAVO; JENNIFER  
24 BRENNAN; SIAN BRODRICK; LAKAYA  
25 BROOKS; JENNIFER BROWN; MARIAH  
26 BRUNO; VALERIE BRYANT; SHERRY  
27 BUENTIEMPO-JOHNSTON; ; CHENIN  
BURNETT-DOERING; MARTIN BURNHAM;  
AARON BURNS; BRIAN BURTON; MEGAN  
BUTLER; CAROLINA CALDERON;  
CHRISTOPHER CALKINS; JUDITH  
CALVARIO; ROCCO CAMARILLO;  
GARRETT CAMP; COLIN CAMPBELL;  
JENETTE CAMPION; ARTURO CAMPOS;  
CARLOS CAMPOS; ESMERALDA CANAL;  
RICHARD CANDELO; NATALIE CANNATA;  
JULIO CANO; GABRIEL CAPULONG; ANN  
CAPUNITAN; KARINA CARBAJAL; JAMES  
CARCHI; JEFFREY CARDENAS; JUANA  
CARRILLO; TRAVIS CARTER; MATTHEW  
CARTWRIGHT; KAMRYN CASIDA;  
KRYSTLE CASPER; BREE CASSIDY; DREW  
CASTEEL; KELVIN CASTELLANOS;  
STEVEN CASTILLO; DAVID CAVER;  
ANDREW CAYABYAB; DANIEL CAZARES;  
SETH CAZIER; HECTOR CEDRUN;  
JENNIFER CENTENO; KATRINA CENTENO;  
MANUEL CEPEDA JR; MARIA CERVANTES;  
MUHAMMAD CERVANTES; ALYSSA  
CHADWICK; JUAN CHAN; KEVIN CHAN;  
LISA CHAN; CECILIA CHARKY; JOHANNA  
CHARLTON; JAQUELINE CHAVARRIA;  
DANNY CHAVEZ; TRACI CHAVEZ; ALIVIA

1 CHAVIRA; DONNA CHISHOLM; SEAN  
2 CHIVERTON; GRACE CHO; HANSANG CHO;  
3 JAMES CHO; MICHAEL CHOI; PATRICK  
4 CHOUERI; TONY CHU; SARAH CHUNG;  
5 ANDREW CHURCHILL; LUANNA NAVIDAD  
6 CISNEROS; JENNIFER CLANTON; ASHLEY  
7 CLARK; PAMELA CLARK; JENNIFER  
8 CLEVELAND; KATRINA COFFMAN;  
9 TIFFANY COMBLEY; JARED COMBS;  
10 DIANNE COMMONS; GABRIEL  
11 CONTRERAS; HECTOR CONTRERAS;  
12 KARLA CONTRERAS; MATTHEW COOK;  
13 JONATHAN CORDOVA; OSIRIS CORDOVA;  
14 ROSEANN CORDOVA; TATIANA  
15 CORDOVA; CHRISTINA CORNEJO;  
16 MELISSA CORNEJO; VALERIE COSTELLO;  
17 ANDREW COTTLE; CHRISTOPHER  
18 COVARRUBIAS; AARON CRUMBAUGH;  
19 ERIC CRUZ; JORGE CUADRA; ANDREW  
20 CULLEY; SHAWNTHA-LISA CUYLAR;  
21 WILLIAM DAIGLE; GERALDINE DALY; BOI  
22 G DANG; ALLISON DATAN; MAUREEN  
23 DATH; AMBER DAVIS; HALILI DAVIS;  
24 JASON DE BERNARDO; ANNA MARIE DE  
25 FRANCIS; ERIC DE SANTIAGO; DANIEL  
26 DEAN; JUAN DEANDA; KLEIN DEBOW;  
27 DOUG DECLOUX; JUDITH DEL CID;  
KORINA DEL REAL; JEAN DELANEY;  
JORDAN M. DELGADO; TIMOTHY  
DEPASCALE; JOSE DETRES; SEAN  
DICKINSON; ELEUTERIO DIEGO;  
SALVADOR DIONES; ROSIE DIPRIMA;  
ERIKA DIZON; ARTURO DOMINGUEZ;  
JASON DONDELINGER; RODRIGO  
DORANTES; ADAM DOUGHERTY;  
EDWARD DU; TREVOR DUDLEY; JESSICA  
DUNTON; RAYMOND DURON; DIEGO  
ECHAVARRIA; ADRIANA EDWARDS;  
DANIEL EDWARDS; JOSHUA EFFLE-HOY;  
ASHLEY ELIAS-PEDROZA; JONATHAN  
EMBURY; BRANDON ENGHUSEN; JANELLE  
ENGLISH; ERIN ENMARK; DIANNA  
ENRIQUEZ; SARA ENSAFIAN; ALFREDO  
ESCOBAR; JENNYFER ESCOBAR; MIGUEL  
ESCOBAR; ADAM ESCOTO; ARACELI  
ESCOTO; FIONNA ESPANA; JOEY ESPIE;  
MARK ESTES; CHRISTOPHER EVANS;  
DANIELLE EVANS; STEPHANIE FAJARDO;  
MELINE FARRELL; FARAMARZ FARSIO;  
LUIS FAVILA; MARTIN M. FERNANDEZ;  
BYRON FIGUEROA; AMY FILAKOUSKY;  
LISA FISHER; CATHERINE FLORES;  
KIMBERLY FLORES; LISA FONSECA-PAGE;

1 BRIAN FOOS; MORGAN FORD; NATHANIEL  
2 FORT; OSBORN FOWLER; RYAN FOWLER;  
3 VINCENT FOY; JAEA FRAILICH; BRYCE  
4 FREEMAN; SANDRA LEAH FREIDENRICH;  
5 ROBERT FUENTES; ARIEL FUJITA; AARON  
6 GABLE; KLARA GAL; KHACHATOUR  
7 GALDJIAN; ASHLEY GALINDO; ISAAC  
8 GALINDO; CHRISTINA GALVAN; MICHAEL  
9 PAUL GAMEROZ, JR.; SOPHIA GAN;  
10 MICHELLE GARAY; JENNIFER GARBEE;  
11 CYNTHIA GARCES; ADRIAN GARCIA;  
12 ASHLEY GARCIA; JACQUELINE GARCIA;  
13 JANET GARCIA; JEFFREY GARCIA;  
14 ASUNTA GARIBAY; ARMAN GARIBYAN;  
15 KIMBERLY GARRETT; JASON GARVIN;  
16 LAURENCE GASPARRO; SARA GASTON;  
17 CHRISTOPHER GAYLORD; MELISSA  
18 GEOGHEGAN; GERALD GERONA;  
19 ELISABETH GIBSON; JENAY GIBSON;  
20 JENNIFER GIBSON; JON GIBSON; MELISSA  
21 GIBSON; KATHY GLASER; CECILIA  
22 GOMEZ; FLOR GOMEZ; JENNIFER GOMEZ;  
23 JESSICA GOMEZ; KEITH GOMEZ; JOEY  
24 GONZALES; JONATHAN GONZALES;  
25 DANIEL GONZALEZ; FERNANDO  
26 GONZALEZ; GEORGE GONZALEZ;  
27 GUSTAVO GONZALEZ; IVAN GONZALEZ;  
28 RAFAEL GONZALEZ; ALI GOODMAN;  
29 MCKENZIE GORDON; ANDREW GRAHAM;  
30 PATRICE GRANT; COREY GRAY; VANESSA  
31 GRAY; JASON GREEN; ASHLEY GREENE;  
32 FREDRIK GRENSTROMER; LAUREL  
33 GRESSETT; JAMES GUERRA; MICHAEL  
34 GUERRA; OSCAR GUERRERO HERNANDEZ;  
35 JEFFREY GUILLEN; LUKE GUIZLO;  
36 ANDREW GUTIERREZ; CAMILLE  
37 GUTIERREZ; ELIZABETH GUTIERREZ;  
38 NATALIE GUTIERREZ; JENNIFER GUZMAN;  
39 LAURA GUZMAN; BRANDON HACKETT;  
40 JAMES HACKL; JEREMY HAMILTON;  
41 BETTY HAN; LEJING HAN; JOSEPH HANCE;  
42 KATHLEEN HARDING; JASON HARDWICK;  
43 ASHLEY HARMON-SKRZAT; LOREN HARO;  
44 EMERY HARRISON JR; ROBERT HEAD;  
45 JESSICA HEALEY; MICHAEL HEALING;  
46 ROCIO HEIL; THOMAS HELSPER; AMBER  
47 HEMPSTEAD; JEREMIAH HENDERSON;  
48 JOSHUA HEREDIA; ANDREW  
49 HERGENROTHER; ASHLEIGH HERNANDEZ;  
50 BRIAN HERNANDEZ; CHRISTOPHER  
51 HERNANDEZ; JULIANNA HERNANDEZ;  
52 SCOTT HERNANDEZ-LOWRY; ELIZABETH  
53 HERRERA; REYNALDO HERRERA;

1 BRADLEY HERRON; GARY HESHKI; FRANK  
2 HICKMAN; TANIA HIDALGO; ADAM  
3 HIGBEE; TIFFANY HIGBEE; BRIAN  
4 HILDENHAGEN; NAVADA HILL; CLAUDIA  
5 HINOJOSA; DON HO; QUE HO; JENNIFER  
6 HOFFMANN; TRESA HOLLIS-PERKINS;  
7 ERIC HOLLOWAY; BEVERLY HOLTZEM  
8 ARGENBRIGHT; ALEXANDER HONG;  
9 ROBERT HORA; NATALIE HORVATH; JULIE  
10 HOVIS; CATHRYN HOWARD; KAREN HUA;  
11 ASHLEY HUDSON; PATRICIA MICHELE  
12 HUERTA; JOSEPH HUIZAR; ALI HULEISY;  
13 OLIVIA HUMBLE; KAITLYN HUMPSTON;  
14 BOBBY HUSTON; HENRY HUYNH; JAKE  
15 HWANG; MICHAEL HYDE; JOSE IBARRA;  
16 KARAN IBRANOSIAN; JHONSON IEM;  
17 ISHMAEL ISAAC; MCKIM JACOBSON;  
18 EDUARD JANSSEN; BROOKE JENSEN;  
19 LAUREN JETTE; EDUARDO JIMENEZ;  
20 CHRISTOPHER JIN; CANDACE JOHNSON;  
21 JAMIE JOHNSON; GERALDINE JONES; JOY  
22 JORDAN; LORD WALTER L. JORDAN-  
23 AZHAR; JOSEPH JUAREZ; JASON JUREK;  
24 JESSICA JUSAK; CHRISTINA KAHN; ORTAL  
25 KAVON; SOFIA KAZANCHIAN; BRAD  
26 KEASLER; SARAH KEE; JOSEPH KELLEY;  
27 SHARON KELLY; KATIE KENNEDY-BOYER;  
CHRISTOPHER KERMANI; LINDSEY  
KEYES; DANNY KHAJEKIAN; MAZEN  
KHAROUFEH; OSHIN KHODAVERDI;  
TRAVIS KILEY; NERSES KILJIAN;  
CATHORINE KIM; CHRIS KIM; DONG KIM;  
JOON OH KIM; MICHAEL KIM; TAE-  
WOONG KIM; VERAPORN KIM; SETH KING;  
SARAH KLEINKNECHT; ALLYSUN KNAPP;  
SHANE KNAPP; ELIZABETH KNIGHT;  
PHILLIP KNOKE; LESLIE RESKA  
KOEHLER; JONATHAN KOLOUCH;  
MEREDITH KRAUT; JUDITH KRINGLE;  
DIANA KWOK; ANA L. CASTILLO  
VASQUEZ; HONEYLYNN LADRILLONO;  
BILLIE LAGOS; ANDREA LAGUNA;  
TATIANA LAGUNA; LITA LAGUTINA;  
MALCOLM LAKES; MICHAEL LAMIEL;  
ELIZABETH LAPOINT; JACOB LARA; LUIS  
LARA; ERIKA LARRONDO; HEATHER  
LARSON; JOI LAWLER; ANGELA LEE;  
EVELYN LEE; KEVIN DOIL LEE; PILYOUNG  
LEE; SAM LEE; SEUNG LEE; STEVEN LEE;  
MARLEN LEIVA; RENE LEIVA; JESSICA  
LENHART; JEFFREY LEONARD; ANDREW  
LEONARDI; MARIE LETT; ARIC LEWIS;  
AUNDRA LEWIS; THERESA LEWIS;

JENNIFER LIMON-ZARAGOZA; TERRI  
LINCOLN; RHEANNA LIPARI; DAVID LIU;  
VIVIAN YUNCHIA LIU; YVONNE LLAMAS;  
MARIE ESTELLE JO LLAMAS-MARTINEZ;  
TATIANA LLERANDI; AIXA LOPEZ; ELAM  
LOPEZ; ERIC LOPEZ; ERICA LOPEZ; JUAN  
LOPEZ; MIGUEL LOPEZ; MARY LOPEZ  
YAWN; KEN LOSARE; LISA LOVE; ASHLEY  
LOVETTE; DOUGLAS LOWE; JENEFER  
LOWE; YOLANDA LOZA; ERIC LUCAS;  
ARTHUR LUNA; MARIA KIM LUND;  
SPENCER LUTZ; MICKEY LY; KRISTINE  
LYNCH; DANUSHKA LYSEK; RAYMOND  
MACE; ALFREDO MACIAS JR.; TIERRA  
MACON; LISA MACVICAR; SHELLIE  
MADERO-MURRIETTA; MARCIANA  
MADISON; EDGAR MADRID; NUARI  
MADRIGAL LOBDELL; SHAHAN  
MADZOUNIAN; STEPHANIE MAGANA;  
JACQUELYN MAGNANO; XOCHITL  
MALDONADO; ERIK MALONZO; VANESSA  
MANALANSAN; NATINAR MANEJA;  
FRANCESCA MARCOS; JOHN MARCUS;  
LISA MARIANI; KATIUSCA MARIN;  
YVONNE MARINEZ; CHERYL  
MARKWARDT; MICHAEL MARQUEZ;  
ROBERT MARQUEZ; HEATHER MARRERO;  
LUDWIN MARROQUIN; SUSANA  
MARROQUIN; SCOTT MARSHALL; RICO  
MARSHELLO; ALLISON MARTIN; DAVID  
MARTIN; STEPHANIE MARTIN; ANGELICA  
MARTINEZ; ARMANDO MARTINEZ; ERIC  
MARTINEZ; HELEN MARTINEZ; IVAN  
MARTINEZ; JESSE MARTINEZ; MEGGY  
MARTINEZ; SAMANTHA MARTINEZ;  
STEPHANIE MARTINEZ; MALISA  
MARZOCCA; CORINNA MASSIET; OSCAR  
MATAMOROS; JENNIFER ANNE MATEO;  
GUILLERMO MAXWELL; HILDA MAYNEZ;  
CHRISTINE MAZAKIAN; VICKIE  
MCDUGAL; CONNAL MCENIRY; TRACY  
MCFARLIN; NATALIE MCFEE; ROBERT  
MCGAHEY; GIA NICOLE MCKEE; COLIN  
MCRAVEY; JEFFREY MCVICAR;  
ELIZABETH MEDINA; STEPHANIE  
MEDRANO; ROMAN MEJIA; GABRIEL  
MELCHOR; LIZETTE MELGOZA; HEZIKIAH  
MENACHO; JOSE A. MENDEZ; ROBERTO  
MENDEZ; TAMMY MENDOZA; ROSE  
MENESES; TOMAS MENESES; LINDA  
MEPOKEE; DANIELA MERCADO; MICHAEL  
MERGIL; JOHANNA MERIDA; LINDA  
MERINO; CHAD MERRELL; HOLLY

1 MESSENGER; MELISSA MIDDLE; DEBRA  
2 MIKK; DAMIEN MILBAUER; BRIAN MIN;  
3 BRIAN MIRANDA; CARMEN MIRANDA;  
4 JACQUELINE MIRELES HERNANDEZ; LUIS  
5 MOLINA; NICHOLAS MONCADA; CYNTHIA  
6 MONROY; DIEGO MONTANO; IVAN  
7 MONTANO; JESSICA MONTANO; JASON  
8 MONTELIBANO; NATASHIA  
9 MONTENEGRO; JOSE MONTERROSA;  
10 CANDICE MONTES PEREZ; SHANDY  
11 MOONEY; DANIEL MOORE; DAISY MORA;  
12 BRENDA MORALES; KEVIN MORALES;  
13 SUSY MORALES; YOHANA M MORALES;  
14 MARIA MORAN; CYNTHIA MOREAU;  
15 DESIREE MORENO; DANNY MOREY;  
16 LAUREN MORIMOTO; TIMOTHY MORITA;  
17 ERNEST MORRIS; CHRISTOPHER  
18 MORRISON; LINDSAY MORROW; JUSTIN  
19 MOSCOWITZ; LAURA MOUA; ERMER  
20 MUNAR; NELLIDA MUNGUA; NICHOLAS  
21 MUNN; ADAH MUNOZ; ; MICHAEL MUNOZ;  
22 NASERA MUNSHI; ALBERT MURPHUY;  
23 STEPHANI MURPHY; JESSICA MURRAY;  
24 ERIN NAJERA-TORRES; ANDY NAJPAUER;  
25 DANIELA NAVA; ZAREH NAZARYAN;  
26 STELLAH NDAHURA; KRISTIAN NELSON;  
27 SARENA NELSON; CHRISTALEY NESBITT;  
STEFANIE NEVAREZ; THOM NEVILLE;  
ALYSON NEVINS; TORCY NEWCOMBE;  
CHARMEL NEWELL; APRIL NEWTON;  
JOHN NEWTON; HOAN NGUYEN; BOBAK  
NIKOO; DAMON NIMMERS; JULIE NOBLE;  
NICOLE NOLASCO; STEPHANIE ROSE  
NORCIO; KIERSTER NORMAN; JORDAN  
NORONA; RICHARD NOWAK; GEORGE  
NUNEZ; AUBREY NURSE; JENNIFER OH;  
MONICA OLAES; AARON OLCH; LEOLOY  
OLMEDO; SAMANTHA OMAR; TONI  
O'NEILL; DESIRAE ONTIVEROS;  
FERNANDO ORIZONDO; GUADALUPE  
ORTEGA; CYNTHIA ORTIZ; OSCAR ORTIZ  
JR; DONNA OSBORN; SHANE OSBORN;  
ALANA O'SHEA; LILI OSTROW; JAMES  
OTERO; GEORGE OUTTEN; TRAVIS OZIER;  
JONATHAN PACE; JONATHAN PACHECO;  
LUIS PADILLA; TRACY PADILLA;  
ORLANDO PAEZ; ANDREW PALACIOS;  
ANDREW PALMER; NICOLE PALMER;  
STEVEN PAPA; ANDRES PAREDES; SARAH  
PARK; MATTHEW PARKER; ANGEL PARRA;  
KRISTIN PASS; ELIZABETH PASTOR;  
KEVIN PATIAG; ELLIOT PATTI; ASHLEY  
PATTON; KAREN PAULK; SAMUEL

1 PAXSON; MARCUS PEDIGO; JOSEPH PELEJ;  
2 SHARON PELLEY; JUSTIN PENA; LEROY  
3 PERDOMO; ANNE-MARIE PEREA;  
4 GEOFFREY PEREA; CARLOS PEREZ;  
5 DANIEL PEREZ; GEORGINA PEREZ;  
6 MELISSA PERRY; ANETTE PESANTES;  
7 TORIE PHAM; NATHANIEL PHILLIPS;  
8 REGINA PHILLIPS; DENISE PIMENTEL;  
9 JESSICA PINA; YOCELIN PINEDO; BRIAN  
10 PIRNAT; NICHOLAS PISZTON; NICOLE  
11 PISZTON FORDE; CAROLYN PLAYER;  
12 TERRIE PLESMID; PATRICIA POCOCK;  
13 STEVEN PODRASKY; ANTHONY POLANCO;  
14 MICHAEL POLONI; KARINA PORCAYO;  
15 ROBERT PORTER; EDNA PORTILLO;  
16 ABRAHAM POSADA; SHAHAB  
17 POURTEYMOOR; JOSHUA PRADOS;  
18 CRISTINA PRESCOTT; MICHAEL PROTUS;  
19 TAYLER PRYCE; ERIN PUCKETT; SUNNI  
20 PUGA; RICHARD PURCELLA; HUNG QUAN;  
21 STEPHANIE QUAYE; STEPHANIE  
22 QUINTANA; JASON QUINTERO; LAUREN  
23 RAGAY; ADAM RAMIREZ; CARLOS  
24 RAMIREZ; MARILIN RAMIREZ; CAROL  
25 RAMOS; RONALDO RAMOS; MANDY  
26 RAMOS-VEAZEY; MATTHEW RANNEY;  
27 PEYMAN RASI; GREG RECANO; CANDACE  
REDDIX; LINDSEY REEDY; BRIAN REETZ;  
GILBERT REGALADO; APRIL REGINO;  
JAVIER RENTERIA OLMEDO; KEVIN REY;  
ANGEL REYES; DANIEL REYES; JOSE  
REYES; REUBEN REYES; YVON REYES;  
CHRISTIE HESTER REYES; SAMANTHA  
RICHARDS; JASON RICKARDS; JOEL  
RILEY; STEPHANIE RILEY; JUAN RINCON;  
AMANDA RION; DIANA RIVERA; NORMA  
RIZO; THELBERT ROARK; BRECK  
ROBERTS; GUSTAVO ROCA; ELENA  
RODAS; REBECA RODAS MEJIA;  
ALEXANDER RODRIGUEZ; DENYSE  
RODRIGUEZ; ERIC RODRIGUEZ; FAVIAN  
RODRIGUEZ; GABRIEL RODRIGUEZ; IRENE  
RODRIGUEZ; JANNETH RODRIGUEZ;  
LETICIA RODRIGUEZ; LUZ RODRIGUEZ;  
PATRCIA RODRIGUEZ; RAMONA  
RODRIGUEZ; RENO RODRIGUEZ;  
BRITTNEY CADENA RODRIGUEZ; AMY  
ROGERS; ANGELA ROLLON; DANIEL  
ROMAN; ABEL ROMERO; CHRISTINA  
ROMERO; ELAINE ROMERO; JUAN  
ROMERO; ALYSSA ROMO; ANDRES  
RONGE; ADRIANA ROSALES; CARRIE

1 ROSEBRAUGH; DAVID ROSENTHAL;  
2 ELEANA ROSENTHAL; ANTHONY ROSKE-  
3 PAMARAN; CAROL ROSS; MARIA  
4 VICTORIA ROSS; SANDRA ROSS; DAVID  
5 RUIVO; ALVARO RUIZ; DANIEL RUIZ;  
6 NICOLE RUIZ; ROBERT RUIZ; ROY RUIZ;  
7 RAYMOND RUOTOLO; MICHAEL RUPP;  
8 KRISTIN RUSH; JAIME SALAS; CARMEN  
9 SALAZAR; JOSUE SALAZAR; YESSICA  
10 SALAZAR; ROBERT SALDANA; MOHAJER  
11 SAMAKAR; JILLIAN SAMMETINGER; ERIC  
12 SANCHEZ; HERNAN SANCHEZ; JORGE  
13 SANCHEZ; JOSE SANCHEZ; JUAN  
14 SANCHEZ; LEYLA SANCHEZ; MEYLIN  
15 SANCHEZ; RODOLFO SANCHEZ;  
16 STEPHANIE SANCHEZ; VALERIE SANCHEZ;  
17 MICHELLE SANCHEZ SANDOVAL; JAYRO  
18 SANDOVAL; JORGE SANDOVAL;  
19 SALVATORE SANMARCO; NUBIA  
20 SANTIAGO; RUBEN SANTIAGO; REGINA  
21 SANTOS; ISMAWATY SANUSI; BIANCA  
22 SAPOZHNIKOV; FRANCES SAU;  
23 TULVINDER SAUND; JACOB SAWYER;  
24 SHAUN SAWYER; STEVEN SCALLION;  
25 KATHRYN SCHAFFER; ANDREW SCHICK;  
26 MICHAEL SCHULLO; CHRISTOPHER  
27 SEERY; ASHLIE SEITZ; SAM SEK;  
JONATHAN SHANNON-BERNARDY; KIRBY  
SHAO; MICHAEL SHEN; TASHA SHERLEY;  
DAVID SHIN; IMAN SHIRVAYS;  
JACQUELINE SILAY; GREGG SILK; BONNIE  
SILVA; ESTEVAN SILVA; ISAAC SILVA;  
JUSTIN SILVA; ROBRICH SIM; TIM  
SIMANEK; REBEKAH SIMS; KATHLEEN  
SINGH; ALLISON SIRIGNANO; AMBER  
SMILEY; DONNA MARIE SMITH;  
GARRISON SMITH; JAYSON SMITH;  
MICHAELDAVID SMITH; SHARON SMITH-  
LERNER; JESUS A SOLIS JR; NOPDOL  
SOONTHONTHUM; ROSANN SOSA; RONNI  
SPARKS; LUCAS SPENSER; SHANNON  
SPRAGUE; MARTIN STAMPLER; DONALD  
STANSELL; ANDREW STARNES; STEVEN  
STEARNS; LORRAE STEVEN; THERESA  
STEVENS; DONNA STEWART; JAY STINE;  
HEIDI STRICKLAND; JOHN STROPLE;  
OLIVIA STROPLE; JODI STRZEBKOWSKI  
NELSON; NATHANIEL SUDBURY;  
ROLANDO SUNGA III; ANDREW SUTTON;  
ERIC SWAB; ALICIA SWEETING; AARON  
TAKAO; JEFFRY TALMAGE; CHING KOK  
TONY TAM; ALEXANDRA TAMAYO;  
VERONICA TAMURA; TERESA TANG;

1 LAWRENCE TAYLOR; TRAVIS TAYLOR;  
2 CHRISTOPHER TEAGUE; TIFFANY  
3 TEERAVATYA; LUCIA TEJEDA-  
4 RIESENBECK; LISA THAYER;  
5 THONGKASAME THEARA; ARICA  
6 THOMAS; SHANE THOMAS; ALICIA G.  
7 THOMPSON; KARLI THOMPSON; SEAN  
8 THOMSEN; CHANTAL THORNTON;  
9 KENNETH TIANEN; NAOMI TIRRONEN;  
10 JAYSON TOMPSON; CYNTHIA TOPETE;  
11 GRIGOR TOROSYAN; ANNA TOSCANO;  
12 ANTHONY TOVAR; CHRISTINE TRAN;  
13 HUNG TRAN; JENNY TRAN; DONNA TRINH;  
14 HEATHER TROTTER; JACQUELINE TROUT;  
15 NANCY TSAI; VAHE TSARUKYAN; EVAN  
16 TSUCHIYAMA; RUSSELL TUAZON;  
17 WHITNEY TUCKER; VIGEN TUMOYAN; TIM  
18 TYLER; GEORGE TZE-POLO; CRYSTAL  
19 UPTON; VICTOR URBINA; DANIEL URIBE;  
20 SONIA G. URIBE; NICOLE URMAN; JESSICA  
21 URQUIZA; DAVID VALDEZ; MARIE  
22 VALDEZ; ROCIO VALDEZ; DAVID  
23 VALENCIA; ERWIN VALENCIA; JENIFFER  
24 VALENZUELA; MARISELA VALENZUELA  
25 GONZALEZ; LAMAR VALLADARES;  
26 CLAUDIA VANBEEKOM; JOSEPH  
27 VANOVER; OSCAR VARELA; ABEL  
VARGAS; ERNESTO VARGAS; ISAAC  
VARGAS; ESTEBAN VASQUEZ; JAMIE  
VASQUEZ; KATHERINE VASQUEZ;  
NICHOLAS VASQUEZ; RAYMOND  
VASQUEZ; JIMENA VAZQUEZ; JASON  
VELASCO; ERIC VELASQUEZ; NELLY  
VELAZQUEZ; ALEXANDRA VELEZ; RYAN  
VELILLA; JESUS VENEGAS; PANNIPA  
VERA; VANESSA VERDUZCO; VICTOR  
VIDES; JAOCB VIGGIANO; RENE  
VILLALOBOS; ERIC VILLEGAS; PETER  
VILLEGAS; FRANCISCO VIZCARRA JR.;  
DIANA VU; ADAM WADDELL; MAXINE  
WAGNER; KERRI WALDO; ALEXANDRA  
WALLEN; CHRISTINA WALTON; SARAH  
WARD; JOY WATKINS; BRANDI WATSON;  
JESSICA WAUGH; JANET WEISS;  
JACQUELINE WELLS; STEPHEN WELLS;  
JANET WEYER; STACIE WHELOCK; ALAN  
WHITCOMB; DENNIS WHITE; JENA WHITE;  
MARISSA WHITE; VICKIE WHITECOTTON;  
CHAD WHITMER; CHRISTOPHER  
WHITNEY-MORRISON; KYRAN WILEY;  
EMILY WILLIAMS; LORREN WILLIAMS;  
TAHESHA WILLIAMS; JAIME WILLIAMS  
JR.; AMANDA WILSON; CHRISTOPHER

1 WILSON; JOE WILSON; CARRIE WOJCIK;  
2 BRANDY WONG; ASHLEIGH WRIGHT;  
3 COURTNEY WRIGHT; GARRETT WRIGHT;  
4 ABIGALE WULFF; STEPHANIE XIMENEZ-  
5 CALDERON; CHRISTINE YAACOUBIAN;  
6 ERIC YBARRA; HONG-KI YOON; SUSAN  
7 YOON; THANGSY YORT; MICHELE  
8 YOSHIMURA; JONATHAN YOUNG; TANIA  
9 YOUNG; WYNN A. YOUNG; BRANDON  
10 YURT; PAUL ZAMUDIO; VENUS ZAVALA;  
11 APRIL ZEKIS; KEREN ZUNIGA; MICHELE  
12 ZURCHER, and ROES 1 to 10,000 inclusive,

13  
14 Plaintiffs,

15 vs.

16 CALIFORNIA SCHOOL OF CULINARY  
17 ARTS, INC., a California corporation; CAREER  
18 EDUCATION CORPORATION, a Delaware  
19 corporation; and DOES 1 to 100 inclusive,

20 Defendants.

21  
22 Plaintiffs' allegations are based on the investigation of counsel, including but not limited to  
23 reviews of advertising and marketing material, SEC filings, other publicly available information,  
24 interviews of former employees and former students, and review of non-confidential documents  
25 produced by Defendants, and thus on information and belief, except as to the individual actions of  
26 Plaintiffs, as to which Plaintiffs have personal knowledge.

### 27 The Parties

1. Plaintiffs, including Roes 1-10,000, are current or former students of the California  
School of Culinary Arts. Identified Plaintiffs are listed in alphabetical order in the appendix  
hereto. That appendix is incorporated into this Complaint as though repeated here, and further sets  
forth each Plaintiff's program of study.

2. Defendant California School of Culinary Arts, Inc. ("CSCA") is a California  
corporation that operates a for-profit culinary school under the same name in Pasadena, California,  
County of Los Angeles. CSCA also currently does and at all relevant times did business as Le

1 Cordon Bleu under a license to use that name. It is wholly owned and operated by Defendant  
2 Career Education Corporation.

3 3. Defendant Career Education Corporation ("CEC") is a Delaware corporation that  
4 does business in the City of Pasadena and the County of Los Angeles by and through its wholly  
5 owned and controlled subsidiary CSCA.

6 4. Plaintiffs are informed and believe that CEC exercises complete dominion and  
7 control over each and all of its subsidiaries and unincorporated divisions, including CSCA, at all  
8 relevant times has enjoyed and enjoys the full benefit of all moneys and profits earned by these  
9 subsidiaries, and benefits in other direct and indirect ways from, and dictated and caused, all of the  
10 wrongful actions of CSCA alleged in this complaint and, as a consequence, is in possession of  
11 moneys rightfully belonging to Plaintiffs. Plaintiffs are informed and believe that CEC develops  
12 and oversees the implementation of all policies and procedures at CSCA including, without  
13 limitation, policies and procedures concerning sales and marketing (admissions) practices,  
14 financial aid practices, curriculum, and job placement. Defendant CSCA then implements and  
15 carries out the policies and procedures developed by CEC.

16 5. CEC, CSCA, and Does 1-100 are collectively referred to herein as the  
17 "Defendants."

18 6. Each of DOES 1-100 is the agent, servant, partner, joint-venturer, co-venturer,  
19 principal, director, officer, manager, employee, or shareholder of one or more of its co-defendants  
20 who aided, abetted, controlled, and directed or conspired with and acted in furtherance of said  
21 conspiracy with one or more of its co-defendants in performance of the acts and omissions  
22 described below and for the fraudulent purposes described below.

23 7. At all relevant times, each Defendant conspired with each other Defendant to  
24 commit the wrongful acts set forth in each cause of action in this complaint, in furtherance of said  
25 conspiracy, and as a result is liable and responsible for the acts of each Defendant that acted  
26 wrongfully, whether or not each co-conspirator actually committed those wrongful acts, or only  
27 conspired with the other Defendants to have them committed.

1 **Factual Summary of the Claims**

2 8. The Defendants aggressively marketed CSCA to Plaintiffs through a pattern of  
3 partial truths, misleading statements, significant omissions, assertions of fact that the Defendants  
4 had no reasonable ground for believing to be true, and outright lies, all of which were designed to  
5 create, in the minds of Plaintiffs, the strong impression that they would be both professionally and  
6 financially better off if they attended CSCA. In fact, Plaintiffs received a degree that is effectively  
7 worthless to them and ended up, at best, with jobs that they could have obtained without a CSCA  
8 degree. Plaintiffs consequently are saddled with non-dischargeable student loans that they cannot  
9 repay or service that cumulate interest, late charges, and collection costs. The result is balances  
10 due that spiral upward to create a condition of lifelong financial ruin and indentured servitude. All  
11 of this was known to the Defendants when they solicited Plaintiffs, but was not disclosed.

12 9. CSCA offers various culinary education programs to its students. Plaintiffs  
13 enrolled in either the 15 month, approximately \$41,000 to \$50,000 Culinary Arts Program or the  
14 10 month, approximately \$22,000 to \$28,000 Patisserie and Baking Program (collectively, the  
15 "Culinary Degree Programs" or "Programs").

16 10. CSCA induces prospective students to enroll in the Programs through an ongoing  
17 fraudulent scheme (the "Fraud") comprised of an extensive marketing campaign that includes  
18 television, radio, print, internet, and in-person recruitment. The in-person component of the Fraud  
19 is carried out by the Defendants' quota-driven salespeople on the phone, by mail, by email, and in  
20 face to face meetings with prospective students.

21 **Written Misrepresentations**

22 11. Over the course of the Fraud, the Defendants made the following written  
23 representations to each Plaintiff:

24 12. The Defendants represented that CSCA's Programs led to Chef jobs. The  
25 Defendants routinely made this representation in their marketing materials, both implicitly and  
26 explicitly. Representative examples include, but are not limited to the following:  
27

- 1 a. A CSCA advertisement attached hereto as Exhibit 1 states "Train to Become a  
2 Professional Chef at California School of Culinary Arts."
- 3 b. A CSCA advertisement attached hereto as Exhibit 2 features a photograph of a  
4 chef's hat and states: "Everything goes with white. Especially success. In our  
5 15-month Culinary Arts Degree Program, you'll gain more expertise and  
6 confidence than in years of working your way up the culinary ladder. You can  
7 graduate a Le Cordon Bleu level culinary chef and enter a world where your  
8 skills are both respected and sought after."
- 9 c. CSCA advertisements attached hereto as Exhibits 3-7 list Chef level positions  
10 as representative examples of job opportunities in culinary arts available to  
11 graduates of CSCA.
- 12 d. A CSCA advertisement attached hereto as Exhibit 8 purports to list the "Top  
13 Ten Reasons to Attend California School of Culinary Arts." The number one  
14 reason is "Le Cordon Bleu" as it "has produced some of the world's finest  
15 chefs...."
- 16 e. A CSCA advertisement attached hereto as Exhibit 9 shows a photo of a Chef  
17 and states "Become a successful artist in just over a year. California School of  
18 Culinary Arts – 15 month Culinary Arts AOS Degree. You'll gain more  
19 expertise in 15 months than in years of working your way up the culinary  
20 ladder. You can graduate a Le Cordon Bleu level culinary chef and enter a  
21 world where your skills are both respected and sought after. Indulge your  
22 creativity. And begin a successful career that challenges and rewards you every  
23 day."
- 24 f. A CSCA postcard advertisement attached hereto as Exhibit 10 shows a photo of  
25 a Chef's hat and states "Some of the great chefs of the past 100 years received  
26 Le Cordon Bleu culinary training. You can, too. ... Find out if a rewarding  
27 career as a highly-trained culinary magician could be right for you."

- 1 g. A CSCA advertisement attached hereto as Exhibit 11 shows a photo of a Chef's  
2 hat and states "How you dress on the weekend could change your life.  
3 Introducing the Weekend Patisserie & Baking Program at the California School  
4 of Culinary Arts. Work a fantastic new career into your busy schedule in only  
5 90 days, through our accelerated weekend program. You'll graduate a Le  
6 Cordon Bleu level pastry chef, in an artistic field where your skills are in  
7 demand and the sky's the limit. That's a career to be proud of."
- 8 h. A CSCA advertisement attached hereto as Exhibit 12 states "Become a Le  
9 Cordon Bleu level pastry chef in an artistic field where your skills are in  
10 demand and the sky's the limit. ... Whether you've ever dreamed of owning  
11 your own bakery, café or special-occasion catering company, or becoming an  
12 executive level pastry chef for a four star restaurant, the Le Cordon Bleu  
13 Patisserie & Baking Program at CSCA is perfect for you."
- 14 i. A letter from CSCA's President, Tony Bondi, to high school seniors attached  
15 hereto as Exhibit 13 states "*If you're the kind of person who has always  
16 dreamed of becoming a professional chef, we can help turn your dream into a  
17 reality...at the California School of Culinary Arts.*"
- 18 j. A page from CSCA's School Catalog, attached hereto as Exhibit 14 states that  
19 CSCA is where "[w]e separate the chefs from the cooks" — implying that  
20 CSCA graduates would be able to obtain Chef positions, not lower level  
21 positions like "line cook" or even "prep cook."
- 22 k. A page from CSCA's School Catalog, attached hereto at Exhibit 15 states:  
23 "CSCA is a great place to explore all aspects of the restaurant industry.  
24 Whether you want to be a restaurant chef, a food stylist, a personal chef, a  
25 caterer, a pastry chef, or baker—it's all available here. It would take you  
26 forever in the real world to get that kind of exposure."  
27

- 1           l. A page from CSCA's School Catalog, attached hereto at Exhibit 16 features a  
2           photograph of a chef and states: "Everything goes with a white jacket.  
3           Especially success. With a career in the culinary arts, baking and patisserie, or  
4           hospitality management, the opportunities are endless."  
5           m. The Defendants' quota-driven salespeople showed prospective students a flip  
6           chart entitled "MAKING THE RIGHT DECISION," containing a section called  
7           "ROAD TO YOUR CAREER", which is attached hereto as Exhibit 17.<sup>1</sup> The  
8           section begins: "JOB OR CAREER... THERE IS A BIG DIFFERENCE." It  
9           shows an overworked kitchen worker and explains: "**JOB**[:] Little or No  
10          Security[,] Low Pay[,] Small Raises[,] Long Hours[,] Few Opportunities[.]"  
11          The next page shows a Chef and states "**CAREER**[:] Personal Professional  
12          Growth[,] Competitive Pay[,] Advancement Opportunities[,] Challenging  
13          Work[,] Employee Benefits[.]"

14          13. The Defendants provided each prospective student with placement statistics  
15          showing that a substantial percentage of graduates (75%-96%, depending upon the period, for the  
16          Culinary Arts Program and, on average and during most of the relevant period, about 75% for the  
17          Patisserie and Baking Program) were placed.<sup>2</sup> Plaintiffs reasonably understood that these  
18          placement rates were based on "Chef" or equivalent positions because, as set forth above, the  
19          Defendants represented that this was the type of position to which a culinary degree from CSCA  
20          would lead.

22          <sup>1</sup> The Defendants' quota-driven salespeople were required to show such flip charts to each  
23          prospective student and were trained that they were the most important part of the interview  
24          process as they would provide prospective students with the facts necessary to make an informed  
25          decision to attend CSCA.

26          <sup>2</sup> The Patisserie and Baking Program's placement rates for 2004 and 2005 were 20% and 53%  
27          respectively. CSCA explained the 20% placement rate in the 2004 statistics with an asterisk  
        noting "This program is new." From 2005 through 2008 the Patisserie and Baking Program's  
        placement rate averaged roughly 77%. While the 2004 and 2005 placement rates are not  
        particularly high, they would have been significantly lower if CSCA only included Chef positions  
        and their equivalent.

1           14.     The Defendants supported these statistics with representations that their graduates  
2 had a strong track record of successful placements. Representative examples of these  
3 representations include, but are not limited to the following:

4           a.     Pages from CSCA's School Catalog attached hereto at Exhibit 18 state: "The  
5 sky's the limit. Upon graduation, you should be fully prepared to make your  
6 mark in the culinary and hospitality industries. ... [E]mployers welcome our  
7 graduates because they know they're working with some of the best possible  
8 candidates."

9           b.     Exhibits 2 and 9, CSCA advertisements described above, state: "You can  
10 graduate a Le Cordon Bleu level culinary chef and enter a world where your  
11 skills are both respected and sought after."

12          c.     Exhibits 11 and 12, CSCA advertisements described above, state "You'll  
13 graduate a Le Cordon Bleu level pastry chef, in an artistic field where your  
14 skills are in demand and the sky's the limit. That's a career to be proud of."

15          15.     The Defendants represented that their Culinary Degree Programs were a good  
16 investment. This message was implied by each of the representations described above, but was  
17 also made expressly. Examples include but are not limited to the following:

18          a.     As part of a flip chart entitled "MAKING THE RIGHT DECISION," the  
19 Defendants' quota-driven salespeople showed prospective students a table,  
20 attached hereto as Exhibit 19, which illustrates a CSCA graduate's projected  
21 earnings over a five year period compared with the military, junior college, and  
22 four year college. The table represents that, by attending CSCA, a prospect  
23 would make significantly more money, and do it sooner, than they would  
24 through these alternatives.

25          b.     The Defendants' quota-driven salespeople showed prospective students flip  
26 chart pages, attached hereto as Exhibit 20, which state "Financing Your  
27 Education   *An Investment in Your Future* ... CONGRATULATIONS! ...

1           You've chosen a wonderful school. You're making a great investment in your  
2           future."

- 3           c. By the nature of the transactions Defendants proposed to Plaintiffs, *i.e.* the  
4           tuition and costs Defendants proposed Plaintiffs pay, and the loans that would  
5           be and were required to pay those costs and attend CSCA (loans that the  
6           Defendants arranged, facilitated, or otherwise made available), Defendants'  
7           represented and then confirmed to prospective students that those who  
8           graduated would be able to service, and within a reasonable period of time pay  
9           off, the loans that the Defendants arranged for them.

10          16. The Defendants represented that CSCA had an aggressive on-site job placement  
11          agency with a great track record for successful placements that would provide career services  
12          support for graduates throughout their careers.

13          17. The Defendants represented that CSCA had an excellent reputation in the food  
14          service industry and that its graduates were highly sought after by employers.

15          18. Each of the foregoing representations was false and misleading. The true facts,  
16          which the Defendants knew and had a duty to disclose, were as follows:

17          19. Defendants have no data or other factual basis for asserting that any substantial  
18          percentage of CSCA graduates ever become chefs. Plaintiffs' investigation suggests that fewer  
19          than 5% of CSCA graduates *ever* become employed as chefs.

20          20. CSCA graduates are, with very rare exceptions, not hired as Chefs. If able to find  
21          employment in the culinary industry at all they find only entry level positions as line cooks, prep  
22          cooks, or other similar positions. On average, these entry level positions paid graduates of the  
23          Patisserie and Baking Program \$8 to \$10 an hour and graduates of the Culinary Arts Program \$10  
24          to \$12 an hour—significantly less than Chef positions typically pay and not enough to maintain  
25          even a minimal standard of living in Los Angeles, particularly after adjusting for the student debt  
26          service obligations that the Defendants knew Plaintiffs and each of them would have as a result of  
27          attending the school.

1           21.     In reality, only years of experience in restaurant kitchens working at low wages,  
2 and/or truly exceptional ability and skills that are not acquired in 12 months of culinary school,  
3 including leadership ability and management skills (for which the Defendants' "admissions"  
4 personnel do not at all screen) could ever qualify anyone to be a Chef. Attending or graduating  
5 from CSCA does not. Because of the experience and skills required to become a Chef, and the  
6 economic burden imposed by the debt a CSCA education entails, perhaps 1 in 50 graduates will  
7 ever become a Sous Chef, and 1 in 200 will ever become a Chef. And, by the time they do their  
8 debt will have become so great that they will continue to live in effective poverty for many, many  
9 years. In other words, fewer than 5% of CSCA graduates will ever get what CSCA sold  
10 Plaintiffs—the opportunity to become a Chef—and virtually none will ever enjoy any net financial  
11 benefit from having gone to CSCA.

12           22.     The Defendants knew that CSCA's Programs did not lead to Chef jobs in the short  
13 term for the vast majority of graduates. As required by California law, the Defendants surveyed  
14 all recent Program graduates regarding their jobs and salaries. These surveys revealed that the  
15 vast majority of recent graduates were not working as Chefs, but were working in entry level  
16 positions, such as prep cook and line cook, that paid \$8 to \$12 an hour, and averaging about \$10  
17 per hour. Moreover, as CSCA knew, most restaurant workers are paid by the hour, so that  
18 restaurants may control costs by sending employees home when the night or day is slow.  
19 Consequently, CSCA knew that these graduates generally lacked the opportunity to earn even this  
20 wage for 40 hours of work 52 weeks a year, or anything close to that. Nevertheless, CSCA chose  
21 to record a \$10 an hour job in its placement records as a "salaried employee at \$22,800 per year  
22 (\$10 per hour x 40 hours a week x 52 weeks). This was a lie.

23           23.     Moreover, and again, the Defendants did not compile any data regarding graduates'  
24 medium or long term wages or their prospects after graduation, and/or of their progress toward  
25 becoming Chefs, but instead remained willfully ignorant of this information. *The Defendants, at*  
26 *all relevant times, had no reasonable ground for believing that any significant percentage of*  
27 *CSCA graduates would ever become chefs, and in fact knew that they would not.* Accordingly, by

1 representing that CSCA's Programs lead to Chef positions, while failing to disclose that they had  
2 no factual basis for that assertion, the Defendants knowingly and intentionally or recklessly misled  
3 Plaintiffs.

4       24. In 2010, Defendants modified their catalog for CSCA, to include the following  
5 language:

6                               Upon completion of the program the  
7 graduate should have the skills needed to  
8 begin their career in the culinary and/or  
9 hospitality industries at an entry level.  
10 Examples of some job titles for graduates  
include Cook, Line Cook, Catering  
11 Assistant, Banquet Cook, Garde Manger,  
Baker, Roundsman and Prep Cook.  
12 The various titles of "chef" generally apply  
to more advanced roles in a professional  
13 kitchen (for example, Sous Chef, Executive  
Chef). Graduates should not expect to  
14 Become Chefs upon graduation but are  
encouraged to work toward becoming a  
15 Chef through the course of their careers.

16 The Defendants knew, since at least 2003, that CSCA graduates had little or no chance of ever  
17 becoming Chefs, and essentially no chance at all of becoming a Chef upon graduation.

18       25. Furthermore, Defendants, in or about 2010, deleted the word "Chef" from their  
19 television advertising and from recruitment materials and scripts, and admit they did so because  
20 the word "Chef" might be "misheard" or "misleading."

21       26. The placement rates the Defendants provided to Plaintiffs were not based only on  
22 "Chef" or equivalent positions, but on any position in the "hospitality" industry obtained by any  
23 graduate. Thus, a graduate who obtained a position as a Starbucks barista, an \$8 an hour prep  
24 cook, a hot dog stand operator, or a "food runner" at multiple mass service events, would be  
25 considered to have been "placed" for purposes of these statistics. Part-time and "freelance"  
26 employees were also considered "placed." CSCA's placement statistics reflected almost entirely  
27 jobs like these paying \$12 an hour or less. Because Plaintiffs reasonably understood these

1 placement rates to refer to Chef-type positions that would pay enough to service the cost of  
2 borrowing and paying for CSCA when they would not and did not, the placement statistics were  
3 grossly false and misleading.

4 27. The Defendants knew that the placement rates were not based only on "Chef" or  
5 equivalent positions because they themselves had sought and obtained the raw data upon which  
6 the statistics were based, had decided what jobs to consider as successful placements, and  
7 calculated the resulting placement rates. The Defendants also knew that prospective students  
8 believed the placement rates were based on Chef and similarly well-paying positions because they  
9 were the ones that had led them to this belief and because counting as successful placements other,  
10 inferior positions (the kind actually counted) was inconsistent with numerous other representations  
11 made by the Defendants as alleged above.

12 28. A CSCA degree is not a good investment but an extremely bad one. To cover the  
13 \$22,000 to \$50,000 cost of CSCA's Programs, virtually all of CSCA's prospective students had to  
14 borrow money, mostly at high and variable interest rates, and mostly with loans specifically  
15 arranged by CSCA. Defendants, at all relevant times, knew that the average loan for their students  
16 probably would bear interest of 12%. Upon graduating, most CSCA students cannot afford the  
17 monthly debt service on these loans with the \$12 an hour or less they earn, a fact the Defendants at  
18 all relevant times knew.

19 29. As a consequence, CSCA students almost uniformly are compelled to enter into  
20 "deferral" arrangements with their lenders whereby their payments obligations are temporarily  
21 suspended but interest accrues along with special charges or fees for the deferral arrangement.  
22 Within three years of graduating, the average CSCA graduate owes \$60,000 or more on his or her  
23 CSCA student loans. After five years, collection charges and other fees and penalties frequently  
24 push this debt to over \$100,000. As student loans are not dischargeable in bankruptcy absent  
25 exceptional circumstances, these former CSCA students have been effectively placed in a position  
26 of indentured servitude. Former CSCA students in many, many cases will never be able to buy a  
27 house, obtain credits cards, rent a car, or borrow money for a real education. A \$22,000 to \$50,000

1 vocational degree that does not increase income and that is financed through high interest debt that  
2 graduates cannot afford to repay is not a good investment, but a financially devastating mistake  
3 that destroys a person's quality of life in material ways—forever.

4         30. The Defendants knew that a CSCA degree was not a good investment. As set forth  
5 above, through their own primary research (calls to graduates and employers) and the resulting  
6 survey results they were aware that their graduates only earned \$8 to \$12 an hour working in the  
7 culinary field, the same wage they could earn in the culinary field without a CSCA degree.  
8 Defendants were also aware of the vast majority of students' loans' terms since they managed the  
9 application process and the signing of applicable loan documents. In addition, they were actively  
10 involved in monitoring and minimizing their graduates' short term default rate by actively  
11 encouraging students to defer their student loan payment obligations—because an excessive  
12 default rate would disqualify CSCA for Title IV funding. Through this involvement, the  
13 Defendants learned that with rare exceptions CSCA graduates did not earn enough working in  
14 culinary jobs to repay their student loans and otherwise pay even very modest living expenses, and  
15 understood that the “education” they sold had the primary effect of impoverishing CSCA  
16 graduates. Defendants

17         31. When during the enrollment process prospective students asked whether they could  
18 expect to service and then pay off their loans taken out to attend CSCA within a reasonable period  
19 of time, they were told “yes” and were provided with a written “estimate” of what they would  
20 need to pay per month to service and pay off their loans taken out to attend CSCA. This written  
21 estimate did not reflect the large payments on “private” loans that would be required and arranged  
22 by CSCA with various lenders to pay for the proposed CSCA training. Instead, the “estimate”  
23 only reflected what CSCA *guessed* the payment would be on the student's federally subsidized  
24 loans. Prospective students were not told that this written estimate of their monthly payment was  
25 only a “guess” by CSCA as to the amounts required to be paid, or that it intentionally excluded the  
26 cost of payments that would be required on the one or more additional “private” loans that CSCA  
27 would arrange and the prospective student would be required to obtain to pay for the proposed

1 CSCA training. These “estimates” were intentionally low, so as to convince prospective students  
2 and continuing students that they would be able to service, and in a reasonable time pay off, their  
3 loans when, in fact, CSCA at all relevant times knew that this would be impossible.

4 32. CEC’s stock analysts were also aware that CSCA—like CEC’s other culinary  
5 schools—was not a good investment. In a third-quarter 2008 CEC earnings call, one equities  
6 analyst covering CEC’s publicly traded stock said to CEC’s senior officers: “. . .[W]e’ve all  
7 known for quite some time that the starting salary levels of students that graduate in that segment  
8 [culinary school] are very low, and that the cost equation does not work out on paper the way it  
9 does in some of the other segments.” In response, these senior officers did not deny this economic  
10 fact.

11 33. Contrary to CSCA’s representations, CSCA did not have an aggressive on-site job  
12 placement agency with a great track record for successful placements and did not provide lifetime  
13 Career Services support. Career Services personnel did little more than direct graduates to  
14 websites with job listings that they could find themselves, such as Craigslist, or provide  
15 compilations of such listings mined from such websites. Career Services personnel devoted no  
16 time to students who were not recent graduates. If such graduates got any help at all, it was a  
17 referral to a public job board.

18 34. Contrary to CSCA’s representations, at all relevant times CSCA had a poor  
19 reputation in the food service industry. Because CSCA admitted students without regard to their  
20 ability to become Chefs and graduated students without due regard for whether they had mastered  
21 the skills CSCA purportedly teaches, many graduates of CSCA had few or none of the skills a  
22 culinary degree should guarantee. Accordingly, a degree from CSCA denoted an unlikelihood  
23 rather than a likelihood of capability and was frequently a detriment to graduates seeking  
24 employment—including those who had mastered the appropriate skills.

25 35. Rather than disclose these facts, the Defendants actively concealed them. Quota-  
26 driven salespeople were directed to, and pursuant to the Defendants’ policies did, methodically  
27

1 avoid any and all discussion of the foregoing true facts. If prospective students raised the issues,  
2 the quota-driven salespeople lied or changed the subject.

3 Oral Misrepresentations

4 36. Through their quota-driven salespeople, the Defendants made each of the foregoing  
5 misrepresentations orally. The quota-driven salespeople also engaged in a pattern and practice of  
6 making made the following additional oral misrepresentations:

7 37. CSCA's quota-driven salespeople routinely claimed that CSCA graduates could  
8 expect to earn Chef salaries of \$40,000 a year—or in many specific instances much more—or,  
9 (instead of answering the “what will I earn” question directly) suggested that prospective students  
10 could find out what a “Chef” makes by doing their own research online (which they knew would  
11 result and did result in prospective students finding that median Chef salaries are generally  
12 \$40,000-\$50,000 a year, and understanding that this was the income they could expect following  
13 graduation).

14 38. CSCA's quota-driven salespeople claimed that CSCA admitted students only  
15 selectively, that it was up to the admissions' representative to either recommend or not  
16 recommend the student for admission to an “admissions committee,” and that such quota-driven  
17 salespeople would only recommend the student for admission if they were convinced the student  
18 would be a good fit and successful in the Program. These representations of selectivity were  
19 implemented by the Defendants through scripts they provided to their quota-driven salespeople.  
20 These lies were intended to and did bolster the credibility of the Defendants' representations that  
21 its Programs qualified graduates for Chef jobs and Chef salaries.

22 39. As the Defendants knew, each of these representations was misleading. The true  
23 facts, which the Defendants had a duty to disclose, were as follows:

- 24 a. The vast majority of CSCA graduates are not hired as Chefs. If they find  
25 employment in the culinary industry at all, they are hired into entry level  
26 positions as line cooks, prep cooks, or other similar positions. On average,  
27 these entry level positions paid graduates of the Patisserie and Baking Program

1                   \$8 to \$10 an hour, and graduates of the Culinary Arts Program \$10 to \$12 an  
2                   hour—significantly less than wage Chef positions typically pay.

- 3                   b. There is no selectivity in CSCA's admissions process, or at least none  
4                   dependent upon ability or suitability. Anyone with a high-school diploma  
5                   and/or a GED who is judged able to obtain a loan and show up for at least the  
6                   first five days of class (thereby enabling CSCA to retain a healthy chunk of the  
7                   student's tuition payments even if they subsequently drop out) is admitted. The  
8                   interview process is solely designed to make the target student more likely to  
9                   sign up and show up, not to screen the target student in any way.
- 10                  c. The Defendants were on notice at all relevant times that these  
11                   misrepresentations and lies were being told to prospective students by their  
12                   employees and, in fact, rewarded their top sales people who, of necessity, were  
13                   the ones telling these lies. Rewards included, among other things,  
14                   miscellaneous perquisites and better sales leads. Because enrollees who knew  
15                   the truth about CSCA would not enroll, honest CSCA salespeople failed to  
16                   convert sales leads into admissions at the same rate as their peers (if at all),  
17                   were not able to meet their admissions targets, and were fired.

18                  40.     CSCA's quota-driven salespeople made other and further oral misrepresentations,  
19                   which differ between Plaintiffs and shall be specifically identified at a later date.

20                  41.     Grossly misled, and reasonably relying on the Defendants' misrepresentations,  
21                   Plaintiffs and each of them borrowed large sums of money at high interest rates and enrolled in  
22                   CSCA. As a result, Plaintiffs have been damaged by, among other things: (1) borrowing the cost  
23                   of attending CSCA at high interest rates; (2) paying tuition to the Defendants; (3) paying interest,  
24                   penalties, and other charges on student loans that the Defendants induced them to take out to pay  
25                   tuition; (4) losing time and income that they otherwise would have earned; (5) incurring  
26                   emotional, psychological, and related injuries; and (6) incurring severe long-term damage to their  
27                   credit including, but not limited to, their ability to obtain credit for auto loans, additional student

1 loans, home loans, and credit cards. Plaintiffs have been damaged in other and further ways  
2 subject to proof at trial.

3 **Tolling of The Statute of Limitations**

4 42. The statute of limitations on Plaintiffs' claims has not run.

5 43. On June 23, 2008, this lawsuit was filed in the Los Angeles County Superior Court  
6 as a putative class action entitled *Vasquez, et al. v. California School of Culinary Arts, Inc., et al.*  
7 (*"Vasquez"*). The claims asserted in this Consolidated Amended Complaint arise from the same  
8 facts and injuries as the claims asserted in *Vasquez* and each plaintiff named herein was a member  
9 of that putative class. On March 6, 2012 class certification was denied in *Vasquez*. The running  
10 of the applicable statutes of limitation on Plaintiffs' claims was equitably tolled from June 23,  
11 2008 until at least March 6, 2012 by the pendency of *Vasquez* as a putative class action.

12 44. Plaintiffs in this Consolidated Amended Complaint include but are not limited to  
13 named plaintiffs from *Vasquez* and plaintiffs who previously filed complaints in the related cases  
14 styled *Banks, et al. v. California School of Culinary Arts, Inc., et al.* BC459917, *Abrica, et al. v.*  
15 *California School of Culinary Arts, Inc., et al.* BC463344, *Alday, et al. v. California School of*  
16 *Culinary Arts, Inc., et al.* BC467048, *Aguilar, et al. v. California School of Culinary Arts, Inc., et*  
17 *al.* BC470851, *Ackerman (Chilcoat), et al. v. California School of Culinary Arts, Inc., et al.*  
18 *BC474275, Arechiga, et al. v. California School of Culinary Arts, Inc., et al.* BC477920,  
19 *Anderson, et al. v. California School of Culinary Arts, Inc., et al.* BC480905, *Allen, et al. v.*  
20 *California School of Culinary Arts, Inc., et al.* BC483198, and a cross-complainant in related case  
21 EC055672.

22 **First Cause of Action for Fraud**

23 45. Plaintiffs incorporate each of the foregoing paragraphs as though repeated here.

24 46. As part of the Fraud, the Defendants knowingly and intentionally made numerous  
25 false and/or misleading representations of material fact with the intent to deceive and/or induce  
26 reliance by Plaintiffs. The Defendants further failed to disclose and concealed facts that they were  
27 required to disclose to prevent other statements that they had made from being false and

1 misleading. Plaintiffs actually and reasonably relied on these misrepresentations, omissions, and  
2 concealments resulting in substantial damages to Plaintiffs in the form of tuition and expenses  
3 paid, loan principal and interest obligations incurred, work time lost, life opportunities lost,  
4 damage to credit, and emotional, psychological, and other injuries incurred.

5 47. As a direct and proximate result, each Plaintiff has been damaged in a sum in  
6 excess of the jurisdictional limits of this Court.

7 48. Defendants' herein-alleged wrongful acts and omissions, and each of them, were  
8 knowingly, willfully, intentionally, maliciously, oppressively, and fraudulently undertaken with  
9 the express purpose and intention of defrauding Plaintiffs, and each of them, all to the substantial  
10 financial benefit of Defendants, and each of them, entitling Plaintiffs to punitive damages.

11 **Second Cause of Action for**  
12 **Violation of California Business and Professions Code § 17200, *et seq.***  
**[The Unfair Competition Law]**

13 49. Plaintiffs incorporate each of the foregoing paragraphs as though repeated here.

14 50. California Business and Professions Code § 17200, *et seq.*, (the "Unfair  
15 Competition Law" or "UCL") authorizes private lawsuits to enjoin acts of "unfair competition,"  
16 which prohibits all unlawful, unfair, and/or fraudulent business practices.

17 51. The UCL imposes strict liability. Plaintiffs need not prove defendant intentionally  
18 or negligently engaged in unlawful, unfair, or fraudulent business practices, only that such  
19 practices occurred.

20 52. The material misrepresentations, concealments, and non-disclosures by the  
21 Defendants are unlawful, unfair, and/or fraudulent business practices prohibited by the UCL.

22 53. The Defendants violated the UCL by engaging in the following *unlawful* business  
23 acts and practices, among others:

- 24 a. Committing common law fraud;  
25 b. Violating the Consumer Legal Remedies Act, California Civil Code § 1770, *et*  
26 *seq.*, as alleged more fully below;  
27

- 1 c. Violating 20 U.S.C. § 1094(a)(8), by failing to provide information  
2 substantiating the truthfulness of published placement statistics at or before the  
3 time of the potential student's application;  
4 d. Violating 16 CFR 254.4(d), by misrepresenting graduates' career success and  
5 salaries;  
6 e. Violating 34 CFR 668.8, by including jobs in placement statistics that were not  
7 in the recognized occupation for which students were seeking training or in a  
8 related comparable recognized occupation;  
9 f. Violating 34 CFR 668.14(b)(10), by failing to provide information  
10 substantiating the truthfulness of published placement statistics at or before the  
11 time of the potential student's enrollment;  
12 g. Violating the Private Postsecondary Education Reform Act of 1989 ("Reform  
13 Act") in various ways including, without limitation, those identified in the  
14 Fourth Cause of Action below, which is incorporated in its entirety as though  
15 repeated here. At all relevant times the Reform Act was either the law of the  
16 State of California or the Defendants were obliged to follow it by contracting  
17 with the State of California to do so, for the benefit of all CSCA prospective  
18 students and students, including Plaintiffs and each of them.

19 54. The Defendants' above-alleged actions, and each of them, further constituted *unfair*  
20 business acts and practices since the actions were deceptive, sharp, immoral, unethical, oppressive,  
21 unscrupulous, substantially injurious, and operate to the competitive disadvantage of other schools  
22 that do not engage in such practices. Moreover, the injury to Plaintiffs was substantial and  
23 outweighs the utility of the Defendants' practices.

24 55. The Defendants' above-alleged actions, and each of them, further constituted  
25 *fraudulent* business acts and practices since the actions were likely to, and did, deceive the public  
26 and likely will mislead the public in the future.

27 56. At all relevant times, the Defendants used the Le Cordon Bleu moniker and

1 marketed their Le Cordon Bleu affiliation, pursuant to a license agreement between CEC and Le  
2 Cordon Bleu (the “LCB License Agreement”), as an inducement to potential students to enroll at  
3 CSCA. At all relevant times, the Defendants violated terms contained and existing in the LCB  
4 License Agreement—including class-size limitations and promises to ensure students are provided  
5 with all necessary support systems—which were specifically intended to benefit CSCA students,  
6 including Plaintiffs. The LCB License Agreement was effective at all relevant times and, pursuant  
7 to those limitations, the Defendants had a legal duty to their licensor and Plaintiffs to conform to  
8 its quality and instruction requirements, which the Defendants disregarded. The Defendants’  
9 violations of the LCB License Agreement, combined with the above-alleged actions and each of  
10 them, constituted unlawful, unfair, and fraudulent business acts or practices.

11 57. Regardless of whether Plaintiffs were intended beneficiaries of the LCB License  
12 Agreement, CSCA’s use of the Le Cordon Bleu moniker and its marketing of CSCA’s Le Cordon  
13 Bleu affiliation as an inducement to potential students to enroll at CSCA, all while failing to  
14 comply with the quality standards enumerated in the LCB License Agreement—including class-  
15 size limitations and promises to ensure students are provided with all necessary support systems—  
16 constituted unlawful, unfair, and fraudulent business acts or practices.

17 58. Pursuant to Cal. Bus. & Prof. Code § 17204, an action for unfair competition may  
18 be brought by any “person . . . who has suffered injury in fact and has lost money or property as a  
19 result of such unfair competition.” The Defendants’ wrongful misrepresentations and omissions  
20 have directly and seriously injured Plaintiffs by causing them to enroll and pay for, almost  
21 universally with money borrowed at high interest rates, a CSCA education that is of no value or  
22 far less value than represented by CSCA.

23 59. The unlawful, unfair, and fraudulent business practices of Defendants are ongoing  
24 and present a continuing threat that members of the public will be misled into attending CSCA.

25 60. Pursuant to the UCL, Plaintiffs are entitled to preliminary and permanent injunctive  
26  
27

1 relief ordering the Defendants to cease this unfair competition, as well as disgorgement and  
2 restitution to Plaintiffs of all money collected and all Notes made or held in connection with the  
3 Defendants' unfair competition, or such portion of those revenues as the Court may find equitable.

4 **Third Cause of Action for**  
5 **Violation of California Civil Code § 1770, *et seq.***  
6 **[The Consumer Legal Remedies Act]**

6 61. Plaintiffs incorporate each of the foregoing paragraphs as though repeated here.

7 62. The Consumers Legal Remedies Act (the "CLRA") creates a non-exclusive  
8 statutory remedy for unfair methods of competition and unfair or deceptive acts or business  
9 practices. *See Reveles v. Toyota by the Bay*, 57 Cal. App. 4th 1139, 1164 (1997). Its self-declared  
10 purpose is to protect consumers against unfair and deceptive business practices and to provide  
11 efficient and economical procedures to secure such protection. Cal. Civil Code §1760. The  
12 CLRA was designed to be liberally construed and applied in favor of consumers to promote its  
13 underlying purposes. *Id.*

14 63. The Defendants have violated paragraphs 5, 7, 9, and 19 of Cal. Civ. Code §  
15 1770(a) by engaging in the unfair and/or deceptive acts and practices set forth herein. The  
16 Defendants' unfair and deceptive business practices in carrying out the Fraud were and are  
17 undertaken in transactions with consumers that were and are intended to and did and do result in  
18 the purchase of the Defendants' services by consumers, including Plaintiffs, in violation of the  
19 CLRA. Cal. Civil Code § 1770, *et seq.*

20 64. As a result of the Defendants' unfair and/or deceptive business practices, Plaintiffs  
21 and all purchasers of the Defendants' services have suffered damage and lost money in that they  
22 paid for services that were not as represented, but were substantially inferior in their nature of  
23 benefits to what Defendants deliberately led Plaintiffs to believe. Plaintiffs seek and are entitled to  
24 an order enjoining the Defendants from continuing to engage in the unfair and deceptive business  
25 practices alleged herein.

**Fourth Cause of Action for  
Violations of Former Education Code Section 94700, *et seq.*  
[Private Postsecondary and Vocational Education Reform Act of 1989]**

65. Plaintiffs incorporate each of the foregoing paragraphs as though repeated here.

66. At all relevant times up to and including June 30, 2007, the Defendants were obligated to comply with the provisions of the Private Postsecondary and Vocational Education Reform Act of 1989, Educ. Code §§ 94700, *et seq.* (the "Reform Act"). Even after the expiration of the Reform Act on June 30, 2007, however, the Defendants were obligated to comply with its provisions because they entered a voluntary agreement with the California Department of Consumer Affairs to do so. This Agreement is attached hereto as Exhibit 21.

67. The Defendants committed the following violations of the Reform Act:

- a. The Defendants violated Educ. Code § 94832(a) by making or causing to be made numerous statements that were untrue or misleading, either by actual statement, omission, or intimation. These acts and omissions have been alleged extensively above but include, without limitation, misrepresentations and omissions regarding: the positions and wages that CSCA's Programs lead to and the assistance CSCA provides in obtaining them, CSCA's selectivity, CSCA's graduates' financial prospects, the affordability of CSCA's Programs, and CSCA's reputation in the job market for culinary professionals.
- b. The Defendants violated Educ. Code § 94832(b) by engaging in numerous false, deceptive, misleading, or unfair acts in connection with advertising and promotion, the recruitment of students for enrollment, the offer or sale of a program of instruction, job placement, training and instruction, the collection of payments, and/or the withholding of equipment, educational materials, or loan or grant funds from students. These acts and omissions have been alleged extensively above but include, without limitation misrepresentations, intimations, and omissions regarding: the positions and wages that CSCA's Programs lead to and the assistance CSCA provides in obtaining them, CSCA's

- 1 selectivity, CSCA's graduates' financial prospects, the affordability of CSCA's  
2 Programs, and CSCA's reputation in the job market for culinary professionals.
- 3 c. The Defendants violated Educ. Code § 94832(l) by directing their  
4 representatives to perform unlawful acts.
- 5 d. The Defendants and their representatives violated Educ. Code § 94830(h) by  
6 presenting false or misleading information to prospective students relating to  
7 CSCA and employment opportunities.
- 8 e. The Defendants and their representatives violated Educ. Code § 94859 (a) & (b)  
9 in that, before executing enrollment agreements with Plaintiffs, the Defendants  
10 and their representatives failed to provide the students with required disclosures  
11 and the disclosures that they provided were inaccurate and misleading. As an  
12 example, and without limitation, in violation of Educ. Code § 94859(a)(2)(B)  
13 the Defendants provided misleading placement rates not calculated in  
14 compliance with Educ. Code § 94854 in that these statistics included  
15 employment in occupations or job titles other than those to which the courses of  
16 instruction were represented to lead. Additionally, the Defendants and their  
17 representatives violated Educ. Code § 94859(b) by failing to document all the  
18 facts required to substantiate the information required by Educ. Code §  
19 94859(a)(2).
- 20 f. The Defendants and their representatives violated Educ. Code § 94859(a)(4) in  
21 that, before executing enrollment agreements with Plaintiffs, the Defendants  
22 and their representatives failed to provide students with a current catalog or  
23 brochure containing information describing all of the occupations or job titles to  
24 which the programs of instruction were represented to lead and all other  
25 material facts concerning the institution and the programs of instruction that  
26 might reasonably affect the students' decisions to enroll.
- 27

- 1           g. The Defendants and their representatives violated Educ. Code § 94859(a)(2)(D)  
2           by making express or implied claims about the salary that may be earned after  
3           completing CSCA's Culinary Program and by failing to disclose: (i) the  
4           percentage of students who were originally scheduled, at the time of  
5           enrollment, to complete the program of instruction in the most recent calendar  
6           year that ended not less than six months prior to the date of disclosure who earn  
7           salaries at or above the claimed level; and (ii) the ranges of monthly salaries  
8           earned by these students in two hundred dollar (\$200) increments and the  
9           number of these students in each salary range.
- 10          h. The Defendants and their representatives violated Educ. Code § 94859(f) by  
11          obtaining signed enrollment agreements from Plaintiffs without providing  
12          students with a reasonable opportunity to review the claims and disclosures  
13          referenced above.
- 14          i. The Defendants and their representatives violated Educ. Code § 94872 by  
15          failing to administer valid standardized tests to Plaintiffs before entering into  
16          enrollment agreements with them, that were designed to measure, and that  
17          reliably and validly measured, a student's ability to be successfully trained to  
18          perform the tasks associated with the occupations or job titles to which the  
19          programs of instruction were represented to lead.

20          68. The Defendants and their representatives willfully committed the above violations,  
21          and the Defendants and their representatives are therefore subject to the civil penalty provisions  
22          provided by Educ. Code § 94877(c), entitling Plaintiffs to recover a civil penalty of up to double  
23          damages.

24          69. Pursuant to the Reform Act, Plaintiffs seek restitution, damages, and a civil penalty  
25          of double damages.  
26  
27

1 **Fifth Cause of Action for Breach of Contract**

2 70. Plaintiffs incorporate each of the foregoing paragraphs as though repeated here.

3 71. As set forth above, effective July 1, 2007, the Defendants entered an agreement  
4 with the California Department of Consumer Affairs to comply with all state statutes, rules, and  
5 regulations pertaining to private postsecondary institutions as they existed on June 30, 2007 (the  
6 "Compliance Agreement"). Pursuant to the Compliance Agreement, the Defendants were legally  
7 obligated to comply with the Reform Act for the duration of the relevant period notwithstanding  
8 its expiration or repeal. *See* Exhibit 21.

9 72. As the Compliance Agreement states, its purpose was "ensuring continued student  
10 protection after [the Reform Act] became inoperative." *Id.* Thus the Compliance Agreement was  
11 made expressly for the benefit of California students, including Plaintiffs. Accordingly, Plaintiffs  
12 are entitled to enforce this contract as third party beneficiaries.

13 73. As set forth above, the Defendants violated the Reform Act. Each such violation  
14 constitutes a breach of the Compliance Agreement.

15 74. Plaintiffs have been damaged by the Defendants' breaches of the Compliance  
16 Agreement.

17 **PRAYER FOR RELIEF**

18 **WHEREFORE**, Plaintiffs pray for relief and judgment as follows—*except that Plaintiffs*  
19 *do not seek damages or restitution under the CLRA at this time:*

20 1. For preliminary and permanent injunctive relief enjoining Defendants CEC and  
21 CSCA, their agents, servants and employees and all persons acting in concert with them from  
22 implementing their Fraud and from continuing to engage in the unfair, unlawful and/or fraudulent  
23 business practices alleged above and that may yet be discovered in the prosecution of this action;

24 2. For restitution;

25 3. For damages;

26 4. For punitive damages against Defendants in an amount sufficient to punish and set  
27 an example;

1           5.     For a civil penalty of up to double damages caused by the Defendants' violations of  
2 the Reform Act;

3           6.     For an accounting by each and all Defendants for any and all profits derived by  
4 them from the herein-alleged unlawful, unfair, and/or fraudulent conduct and/or business  
5 practices;

6           7.     For rescission of any contract entered into with Defendants;

7           8.     For attorneys' fees and expenses pursuant to all applicable laws including, without  
8 limitation, contract, Civil Code sections 1717 and 1780(e), Code of Civil Procedure §1021.5,  
9 former Reform Act § 94877(b); and the common law private attorney general doctrine;

10          9.     For costs of suit;

11          10.    For such other and further relief as the Court deems just and proper.

12       Date: June 15, 2012

**RESPECTFULLY SUBMITTED,**

**KIRTLAND & PACKARD LLP**

Michael Louis Kelly

Behram V. Parekh

Joshua A. Fields

Amir D. Benakore

By: 

Michael Louis Kelly

2041 Rosecrans Avenue, Third Floor

El Segundo, California 90245

Phone: 310.536.1000

Facsimile: 310.536.1001

**GALLO & ASSOCIATES**

Ray E. Gallo

Dominic Valerian

1101 Fifth Avenue, Suite 205

San Rafael, CA 94901

Phone: 310.338.1114


Facsimile: 310.338.1199

*Counsel for Plaintiffs*

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27

Date: June 15, 2012

**KIRTLAND & PACKARD LLP**  
**GALLO & ASSOCIATES**

  
Michael Louis Kelly

Ray E. Gallo  
Dominic Valerian  
1101 Fifth Avenue, Suite 205  
San Rafael, CA 94901  
Phone: 310.338.1114  
Facsimile: 310.338.1199

*Counsel for Plaintiffs*

## APPENDIX

No.	Full Name	Program
1	Sufyan Abdelshife	Culinary Arts
2	Charles Abrenica	Culinary Arts
3	Cinthia Abrica	Culinary Arts
4	Kevin Aceves	Baking & Pastry
5	Heather Ackerman	Baking & Pastry
6	Eric Adabkhah	Culinary Arts
7	Pryscilla Adame	Culinary Arts
8	Angela Adams	Baking & Pastry
9	Melanie Adams	Culinary Arts
10	Aileen Adham	Culinary Arts
11	Cyed Adraincem	Culinary Arts
12	Susana Agredano	Culinary Arts
13	April Aguilar	Culinary Arts
14	Candida Aguilar	Culinary Arts
15	Jazmin Aguilar	Culinary Arts
16	Maria Jose Aguilar	Culinary Arts
17	Isela Aguirre	Culinary Arts
18	Antonio Alano	Culinary Arts
19	Veronica Alberto	Culinary Arts
20	Cherry Alcala	Culinary Arts
21	Aldrich Alcantara	Culinary Arts
22	Ricardo Alcina	Culinary Arts
23	Alaynne Alday	Culinary Arts
24	Josephine Alford	Culinary Arts

## APPENDIX

No.	Full Name	Program
25	Megan Allen	Baking & Pastry
26	Kevin Altamira	Culinary Arts
27	John Altman	Culinary Arts
28	Karapet Altounian	Culinary Arts
29	Edson Alvarez	Culinary Arts
30	Eileen Amador	Baking & Pastry
31	Amber Amos	Culinary Arts
32	Antonio Anderson	Culinary Arts
33	Justin Anderson	Culinary Arts
34	Scott Anderson	Culinary Arts
35	Heather Andres	Culinary Arts
36	Maricar Angeles	Culinary Arts
37	Marko Angulo	Culinary Arts
38	Heather Aposhian	Culinary Arts
39	Kenneth Aranda	Culinary Arts
40	Yadira Arandia Martinez	Baking & Pastry
41	Luis Arbaiza	Culinary Arts
42	Jeff Ardi	Culinary Arts
43	Tiffany Arechiga	Baking & Pastry
44	Samuel Arellano	Culinary Arts
45	Sheila Arensdorf	Culinary Arts
46	Edward Arguelles	Culinary Arts
47	Andres Arias	Baking & Pastry
48	Annel Arias	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
49	Elena Armendarez	Culinary Arts
50	Geoffrey Armstrong	Culinary Arts
51	Alfonso Arroyo	Culinary Arts
52	Michael Artus-Cooper	Culinary Arts
53	Stacy Ashburn	Culinary Arts
54	Kyle Au	Culinary Arts
55	Stacey Ausby	Culinary Arts
56	Diane Aveytia	Culinary Arts
57	Dora Avila	Culinary Arts
58	Andrea Avina	Culinary Arts
59	Elmer Axume	Culinary Arts
60	Amy Badawi	Culinary Arts
61	Melannie Baedor	Culinary Arts
62	Jin Baek	Culinary Arts
63	Raymond Baker, Jr.	Culinary Arts
64	Tiffany Banks	Baking & Pastry
65	Anthony Banuelos	Culinary Arts
66	Vanessa Banuelos	Culinary Arts
67	Darren Barber	Culinary Arts
68	Celeste Barrios	Culinary Arts
69	Rebecca Barter	Culinary Arts
70	Sohail Bashirian	Culinary Arts
71	Christopher Bates	Culinary Arts
72	Luswin Bautista	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
73	Christine Beadle	Baking & Pastry
74	Paul Becerra	Culinary Arts
75	Tanya Beebe	Culinary Arts
76	Katlyn Beggs	Baking & Pastry
77	Oscar Bejarano	Culinary Arts
78	Melissa Bendig	Culinary Arts
79	Nataly Benton	Culinary Arts
80	Joshua Berenguel	Culinary Arts
81	Haley Berger	Baking & Pastry
82	Sarah Berkefeld	Culinary Arts
83	Anna Berkowitz	Baking & Pastry
84	Hannah Berley	Baking & Pastry
85	Jasmine Bermudez	Culinary Arts
86	Freddy Bernabe	Culinary Arts
87	Michael Berry	Culinary Arts
88	Nick Beswick	Culinary Arts
89	Jon Billings	Culinary Arts
90	Sylvia Blair	Culinary Arts
91	Thaddeus Blanton	Culinary Arts
92	Patrick Bleemers	Culinary Arts
93	John Bogatz	Culinary Arts
94	Christian Bolanos	Culinary Arts
95	Roland Bombane	Culinary Arts
96	Jason Bonaga	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
97	Eric Bonillo	Culinary Arts
98	Christopher Booker	Culinary Arts
99	Rosaura Borges	Culinary Arts
100	Annika Boucard	Culinary Arts
101	Candice Bowker	Culinary Arts
102	Evan Branning	Culinary Arts
103	Asuzena Bravo	Culinary Arts
104	Jennifer Brennan	Culinary Arts
105	Sian Brodrick	Culinary Arts
106	Lakaya Brooks	Culinary Arts
107	Jennifer Brown	Culinary Arts
108	Mariah Bruno	Culinary Arts
109	Valerie Bryant	Culinary Arts
110	Sherry Buentiempo-Johnston	Culinary Arts
111	Chenin Burnett-Doering	Culinary Arts
112	Martin Burnham	Culinary Arts
113	Aaron Burns	Culinary Arts
114	Brian Burton	Culinary Arts
115	Megan Butler	Culinary Arts
116	Carolina Calderon	Culinary Arts
117	Christopher Calkins	Culinary Arts
118	Judith Calvario	Culinary Arts
119	Rocco Camarillo	Baking & Pastry
120	Garrett Camp	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
121	Colin Campbell	Culinary Arts
122	Jenette Campion	Culinary Arts
123	Arturo Campos	Culinary Arts
124	Carlos Campos	Culinary Arts
125	Esmeralda Canal	Culinary Arts
126	Richard Candelo	Culinary Arts
127	Natalie Cannata	Culinary Arts
128	Julio Cano	Culinary Arts
129	Gabriel Capulong	Culinary Arts
130	Ann Capunitan	Culinary Arts
131	Karina Carbajal	Baking & Pastry
132	James Carchi	Culinary Arts
133	Jeffrey Cardenas	Culinary Arts
134	Juana Carrillo	Culinary Arts
135	Travis Carter	Culinary Arts
136	Matthew Cartwright	Culinary Arts
137	Kamryn Casida	Culinary Arts
138	Krystle Casper	Culinary Arts
139	Bree Cassidy	Culinary Arts
140	Drew Casteel	Baking & Pastry
141	Kelvin Castellanos	Culinary Arts
142	Steven Castillo	Culinary Arts
143	David Caver	Culinary Arts
144	Andrew Cayabyab	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
145	Daniel Cazares	Culinary Arts
146	Seth Cazier	Culinary Arts
147	Hector Cedrun	Culinary Arts
148	Jennifer Centeno	Baking & Pastry
149	Katrina Centeno	Culinary Arts
150	Manuel Cepeda Jr	Culinary Arts
151	Maria Cervantes	Culinary Arts
152	Muhammad Cervantes	Baking & Pastry
153	Alyssa Chadwick	Baking & Pastry
154	Juan Chan	Baking & Pastry
155	Kevin Chan	Culinary Arts
156	Lisa Chan	Culinary Arts
157	Cecilia Charky	Baking & Pastry
158	Johanna Charlton	Baking & Pastry
159	Jaqueline Chavarria	Culinary Arts
160	Danny Chavez	Culinary Arts
161	Traci Chavez	Culinary Arts
162	Alivia Chavira	Culinary Arts
163	Donna Chisholm	Culinary Arts
164	Sean Chiverton	Culinary Arts
165	Grace Cho	Baking & Pastry
166	Hansang Cho	Culinary Arts
167	James Cho	Culinary Arts
168	Michael Choi	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
169	Patrick Choueiri	Culinary Arts
170	Tony Chu	Culinary Arts
171	Sarah Chung	Baking & Pastry
172	Andrew Churchill	Culinary Arts
173	Luanna Navidad Cisneros	Culinary Arts
174	Jennifer Clanton	Culinary Arts
175	Ashley Clark	Baking & Pastry
176	Pamela Clark	Culinary Arts
177	Jennifer Cleveland	Culinary Arts
178	Katrina Coffman	Baking & Pastry
179	Tiffany Combley	Baking & Pastry
180	Jared Combs	Culinary Arts
181	Dianne Commons	Culinary Arts
182	Gabriel Contreras	Culinary Arts
183	Hector Contreras	Culinary Arts
184	Karla Contreras	Culinary Arts
185	Matthew Cook	Culinary Arts
186	Jonathan Cordova	Culinary Arts
187	Osiris Cordova	Baking & Pastry
188	Roseann Cordova	Culinary Arts
189	Tatiana Cordova	Baking & Pastry
190	Christina Cornejo	Baking & Pastry
191	Melissa Cornejo	Culinary Arts
192	Valerie Costello	Baking & Pastry

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
193	Andrew Cottle	Baking & Pastry
194	Christopher Covarrubias	Culinary Arts
195	Aaron Crumbaugh	Culinary Arts
196	Eric Cruz	Culinary Arts
197	Jorge Cuadra	Culinary Arts
198	Andrew Culley	Culinary Arts
199	Shawntha-Lisa Cuylar	Culinary Arts
200	William Daigle	Culinary Arts
201	Geraldine Daly	Baking & Pastry
202	Boi G Dang	Culinary Arts
203	Allison Datan	Culinary Arts
204	Maureen Dath	Culinary Arts
205	Amber Davis	Culinary Arts
206	Halili Davis	Culinary Arts
207	Jason De Bernardo	Culinary Arts
208	Anna Marie De Francis	Culinary Arts
209	Eric De Santiago	Culinary Arts
210	Daniel Dean	Culinary Arts
211	Juan Deanda	Culinary Arts
212	Klein Debow	Culinary Arts
213	Doug Decloux	Culinary Arts
214	Judith Del Cid	Baking & Pastry
215	Korina Del Real	Baking & Pastry
216	Jean Delaney	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
217	Jordan M. Delgado	Culinary Arts
218	Timothy Depascale	Culinary Arts
219	Jose Detres	Baking & Pastry
220	Sean Dickinson	Culinary Arts
221	Eleuterio Diego	Culinary Arts
222	Salvador Diones	Culinary Arts
223	Rosie Diprima	Culinary Arts
224	Erika Dizon	Baking & Pastry
225	Arturo Dominguez	Culinary Arts
226	Jason Dondelinger	Culinary Arts
227	Rodrigo Dorantes	Baking & Pastry
228	Adam Dougherty	Culinary Arts
229	Edward Du	Culinary Arts
230	Trevor Dudley	Culinary Arts
231	Jessica Dunton	Culinary Arts
232	Raymond Duron	Culinary Arts
233	Diego Echavarria	Culinary Arts
234	Adriana Edwards	Baking & Pastry
235	Daniel Edwards	Culinary Arts
236	Joshua Effle-Hoy	Culinary Arts
237	Ashley Elias-Pedroza	Culinary Arts
238	Jonathan Embury	Culinary Arts
239	Brandon Enghusen	Culinary Arts
240	Janelle English	Baking & Pastry

## APPENDIX

No.	Full Name	Program
241	Erin Enmark	Baking & Pastry
242	Dianna Enriquez	Culinary Arts
243	Sara Ensafian	Culinary Arts
244	Alfredo Escobar	Culinary Arts
245	Jennyfer Escobar	Culinary Arts
246	Miguel Escobar	Culinary Arts
247	Adam Escoto	Culinary Arts
248	Araceli Escoto	Baking & Pastry
249	Fionna Espana	Culinary Arts
250	Joey Espie	Culinary Arts
251	Mark Estes	Culinary Arts
252	Christopher Evans	Culinary Arts
253	Danielle Evans	Culinary Arts
254	Stephanie Fajardo	Culinary Arts
255	Meline Farrell	Culinary Arts
256	Faramarz Farsio	Culinary Arts
257	Luis Favila	Culinary Arts
258	Martin M. Fernandez	Culinary Arts
259	Byron Figueroa	Culinary Arts
260	Amy Filakousky	Culinary Arts
261	Lisa Fisher	Baking & Pastry
262	Catherine Flores	Baking & Pastry
263	Kimberly Flores	Culinary Arts
264	Lisa Fonseca-Page	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
265	Brian Foos	Culinary Arts
266	Morgan Ford	Culinary Arts
267	Nathaniel Fort	Culinary Arts
268	Osborn Fowler	Culinary Arts
269	Ryan Fowler	Culinary Arts
270	Vincent Foy	Culinary Arts
271	Jaela Frailich	Culinary Arts
272	Bryce Freeman	Culinary Arts
273	Sandra Leah Freidenrich	Culinary Arts
274	Robert Fuentes	Culinary Arts
275	Ariel Fujita	Culinary Arts
276	Aaron Gable	Culinary Arts
277	Klara Gal	Baking & Pastry
278	Khachatour Galdjian	Culinary Arts
279	Ashley Galindo	Baking & Pastry
280	Isaac Galindo	Culinary Arts
281	Christina Galvan	Culinary Arts
282	Michael Paul Gameroz, Jr.	Culinary Arts
283	Sophia Gan	Baking & Pastry
284	Michelle Garay	Culinary Arts
285	Jennifer Garbee	Baking & Pastry
286	Cynthia Garces	Culinary Arts
287	Adrian Garcia	Culinary Arts
288	Ashley Garcia	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
289	Jacqueline Garcia	Culinary Arts
290	Janet Garcia	Culinary Arts
291	Jeffrey Garcia	Culinary Arts
292	Asunta Garibay	Culinary Arts
293	Arman Garibyan	Culinary Arts
294	Kimberly Garrett	Culinary Arts
295	Jason Garvin	Culinary Arts
296	Laurence Gasparro	Baking & Pastry
297	Sara Gaston	Baking & Pastry
298	Christopher Gaylord	Culinary Arts
299	Melissa Geoghegan	Culinary Arts
300	Gerald Gerona	Culinary Arts
301	Elisabeth Gibson	Baking & Pastry
302	Jenay Gibson	Culinary Arts
303	Jennifer Gibson	Culinary Arts
304	Jon Gibson	Culinary Arts
305	Melissa Gibson	Baking & Pastry
306	Kathy Glaser	Culinary Arts
307	Cecilia Gomez	Baking & Pastry
308	Flor Gomez	Culinary Arts
309	Jennifer Gomez	Culinary Arts
310	Jessica Gomez	Baking & Pastry
311	Keith Gomez	Culinary Arts
312	Joey Gonzales	Baking & Pastry

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
313	Jonathan Gonzales	Culinary Arts
314	Daniel Gonzalez	Culinary Arts
315	Fernando Gonzalez	Culinary Arts
316	George Gonzalez	Culinary Arts
317	Gustavo Gonzalez	Culinary Arts
318	Ivan Gonzalez	Culinary Arts
319	Rafael Gonzalez	Culinary Arts
320	Ali Goodman	Baking & Pastry
321	Mckenzie Gordon	Baking & Pastry
322	Andrew Graham	Culinary Arts
323	Patrice Grant	Culinary Arts
324	Corey Gray	Culinary Arts
325	Vanessa Gray	Baking & Pastry
326	Jason Green	Culinary Arts
327	Ashley Greene	Culinary Arts
328	Fredrik Grenstromer	Culinary Arts
329	Laurel Gressett	Baking & Pastry
330	James Guerra	Culinary Arts
331	Michael Guerra	Culinary Arts
332	Oscar Guerrero Hernandez	Culinary Arts
333	Jeffrey Guillen	Baking & Pastry
334	Luke Guizlo	Culinary Arts
335	Andrew Gutierrez	Culinary Arts
336	Camille Gutierrez	Baking & Pastry

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
337	Elizabeth Gutierrez	Baking & Pastry
338	Natalie Gutierrez	Culinary Arts
339	Jennifer Guzman	Culinary Arts
340	Laura Guzman	Culinary Arts
341	Brandon Hackett	Culinary Arts
342	James Hackl	Culinary Arts
343	Jeremy Hamilton	Culinary Arts
344	Betty Han	Culinary Arts
345	Lejing Han	Culinary Arts
346	Joseph Hance	Culinary Arts
347	Kathleen Harding	Baking & Pastry
348	Jason Hardwick	Culinary Arts
349	Ashley Harmon-Skrzat	Culinary Arts
350	Loren Haro	Baking & Pastry
351	Emery Harrison Jr	Culinary Arts
352	Robert Head	Culinary Arts
353	Jessica Healey	Culinary Arts
354	Michael Healing	Culinary Arts
355	Rocio Heil	Culinary Arts
356	Thomas Helsper	Culinary Arts
357	Amber Hempstead	Culinary Arts
358	Jeremiah Henderson	Culinary Arts
359	Joshua Heredia	Culinary Arts
360	Andrew Hergenrother	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
361	Ashleigh Hernandez	Baking & Pastry
362	Brian Hernandez	Baking & Pastry
363	Christopher Hernandez	Culinary Arts
364	Julianna Hernandez	Baking & Pastry
365	Scott Hernandez-Lowry	Culinary Arts
366	Elizabeth Herrera	Culinary Arts
367	Reynaldo Herrera	Culinary Arts
368	Bradley Herron	Culinary Arts
369	Gary Heshki	Culinary Arts
370	Frank Hickman	Culinary Arts
371	Tania Hidalgo	Baking & Pastry
372	Adam Higbee	Culinary Arts
373	Tiffany Higbee	Culinary Arts
374	Brian Hildenhagen	Culinary Arts
375	Navada Hill	Baking & Pastry
376	Claudia Hinojosa	Culinary Arts
377	Don Ho	Culinary Arts
378	Que Ho	Culinary Arts
379	Jennifer Hoffmann	Baking & Pastry
380	Tresa Hollis-Perkins	Baking & Pastry
381	Eric Holloway	Culinary Arts
382	Beverly Holtzem Argenbright	Baking & Pastry
383	Alexander Hong	Culinary Arts
384	Robert Hora	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
385	Natalie Horvath	Baking & Pastry
386	Julie Hovis	Culinary Arts
387	Cathryn Howard	Baking & Pastry
388	Karen Hua	Culinary Arts
389	Ashley Hudson	Baking & Pastry
390	Patricia Michele Huerta	Culinary Arts
391	Joseph Huizar	Culinary Arts
392	Ali Huleisy	Culinary Arts
393	Olivia Humbles	Baking & Pastry
394	Kaitlyn Humpston	Culinary Arts
395	Bobby Huston	Culinary Arts
396	Henry Huynh	Culinary Arts
397	Jake Hwang	Culinary Arts
398	Michael Hyde	Culinary Arts
399	Jose Ibarra	Culinary Arts
400	Karan Ibranosian	Culinary Arts
401	Jhonson Iem	Baking & Pastry
402	Ishmael Isaac	Culinary Arts
403	Mckim Jacobson	Baking & Pastry
404	Eduard Janssen	Culinary Arts
405	Brooke Jensen	Culinary Arts
406	Lauren Jette	Baking & Pastry
407	Eduardo Jimenez	Culinary Arts
408	Christopher Jin	Culinary Arts

## APPENDIX

No.	Full Name	Program
409	Candace Johnson	Culinary Arts
410	Jamie Johnson	Culinary Arts
411	Geraldine Jones	Baking & Pastry
412	Joy Jordan	Culinary Arts
413	Lord Walter L. Jordan-Azhar	Culinary Arts
414	Joseph Juarez	Culinary Arts
415	Jason Jurek	Culinary Arts
416	Jessica Jusak	Culinary Arts
417	Christina Kahn	Baking & Pastry
418	Ortal Kavon	Baking & Pastry
419	Sofia Kazanchian	Culinary Arts
420	Brad Keasler	Culinary Arts
421	Sarah Kee	Culinary Arts
422	Joseph Kelley	Culinary Arts
423	Sharon Kelly	Culinary Arts
424	Katie Kennedy-Boyer	Culinary Arts
425	Christopher Kermani	Culinary Arts
426	Lindsey Keyes	Culinary Arts
427	Danny Khajekian	Culinary Arts
428	Mazen Kharoufeh	Culinary Arts
429	Oshin Khodaverdi	Culinary Arts
430	Travis Kiley	Culinary Arts
431	Nerses Kiljian	Culinary Arts
432	Cathorine Kim	Baking & Pastry

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
433	Chris Kim	Culinary Arts
434	Dong Kim	Culinary Arts
435	Joon Oh Kim	Culinary Arts
436	Michael Kim	Culinary Arts
437	Tae-Woong Kim	Culinary Arts
438	Veraporn Kim	Baking & Pastry
439	Seth King	Culinary Arts
440	Sarah Kleinknecht	Culinary Arts
441	Allysun Knapp	Baking & Pastry
442	Shane Knapp	Culinary Arts
443	Elizabeth Knight	Culinary Arts
444	Phillip Knoke	Culinary Arts
445	Leslie Reska Koehler	Culinary Arts
446	Jonathan Kolouch	Culinary Arts
447	Meredith Kraut	Culinary Arts
448	Judith Kringle	Culinary Arts
449	Diana Kwok	Baking & Pastry
450	Ana L. Castillo Vasquez	Culinary Arts
451	Honeylynn Ladrillono	Culinary Arts
452	Billie Lagos	Baking & Pastry
453	Andrea Laguna	Culinary Arts
454	Tatiana Laguna	Baking & Pastry
455	Lita Lagutina	Culinary Arts
456	Malcolm Lakes	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
457	Michael Lamiel	Culinary Arts
458	Elizabeth Lapoint	Baking & Pastry
459	Jacob Lara	Culinary Arts
460	Luis Lara	Culinary Arts
461	Erika Larrondo	Culinary Arts
462	Heather Larson	Culinary Arts
463	Joi Lawler	Baking & Pastry
464	Angela Lee	Culinary Arts
465	Evelyn Lee	Culinary Arts
466	Kevin Doil Lee	Culinary Arts
467	Pilyoung Lee	Culinary Arts
468	Sam Lee	Culinary Arts
469	Seung Lee	Culinary Arts
470	Steven Lee	Culinary Arts
471	Marlen Leiva	Culinary Arts
472	Rene Leiva	Culinary Arts
473	Jessica Lenhart	Culinary Arts
474	Jeffrey Leonard	Culinary Arts
475	Andrew Leonardi	Baking & Pastry
476	Marie Lett	Baking & Pastry
477	Aric Lewis	Culinary Arts
478	Aundra Lewis	Culinary Arts
479	Theresa Lewis	Culinary Arts
480	Jennifer Limon-Zaragoza	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
481	Terri Lincoln	Culinary Arts
482	Rheanna Lipari	Culinary Arts
483	David Liu	Culinary Arts
484	Vivian Yunchia Liu	Baking & Pastry
485	Yvonne Llamas	Culinary Arts
486	Marie Estelle Jo Llamas-Martinez	Baking & Pastry
487	Tatiana Llerandi	Baking & Pastry
488	Aixa Lopez	Culinary Arts
489	Elam Lopez	Baking & Pastry
490	Eric Lopez	Culinary Arts
491	Erica Lopez	Culinary Arts
492	Juan Lopez	Culinary Arts
493	Miguel Lopez	Culinary Arts
494	Mary Lopez Yawn	Culinary Arts
495	Ken Losare	Culinary Arts
496	Lisa Love	Culinary Arts
497	Ashley Lovette	Culinary Arts
498	Douglas Lowe	Culinary Arts
499	Jenefer Lowe	Baking & Pastry
500	Yolanda Loza	Culinary Arts
501	Eric Lucas	Culinary Arts
502	Arthur Luna	Culinary Arts
503	Maria Kim Lund	Baking & Pastry
504	Spencer Lutz	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
505	Mickey Ly	Culinary Arts
506	Kristine Lynch	Culinary Arts
507	Danushka Lysek	Culinary Arts
508	Raymond Mace	Culinary Arts
509	Alfredo Macias Jr.	Culinary Arts
510	Tierra Macon	Baking & Pastry
511	Lisa Macvicar	Baking & Pastry
512	Shellie Madero-Murrietta	Culinary Arts
513	Marciana Madison	Culinary Arts
514	Edgar Madrid	Culinary Arts
515	Nuari Madrigal Lobdell	Baking & Pastry
516	Shahan Madzounian	Culinary Arts
517	Stephanie Magana	Baking & Pastry
518	Jacquelyn Magnano	Culinary Arts
519	Xochitl Maldonado	Culinary Arts
520	Erik Malonzo	Culinary Arts
521	Vanessa Manalansan	Baking & Pastry
522	Natinar Maneja	Culinary Arts
523	Francesca Marcos	Culinary Arts
524	John Marcus	Culinary Arts
525	Lisa Mariani	Culinary Arts
526	Katiusca Marin	Culinary Arts
527	Yvonne Marinez	Culinary Arts
528	Cheryl Markwardt	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
529	Michael Marquez	Culinary Arts
530	Robert Marquez	Culinary Arts
531	Heather Marrero	Culinary Arts
532	Ludwin Marroquin	Culinary Arts
533	Susana Marroquin	Baking & Pastry
534	Scott Marshall	Culinary Arts
535	Rico Marshello	Culinary Arts
536	Allison Martin	Culinary Arts
537	David Martin	Culinary Arts
538	Stephanie Martin	Baking & Pastry
539	Angelica Martinez	Baking & Pastry
540	Armando Martinez	Culinary Arts
541	Eric Martinez	Culinary Arts
542	Helen Martinez	Culinary Arts
543	Ivan Martinez	Culinary Arts
544	Jesse Martinez	Culinary Arts
545	Meggy Martinez	Culinary Arts
546	Samantha Martinez	Culinary Arts
547	Stephanie Martinez	Baking & Pastry
548	Malisa Marzocca	Baking & Pastry
549	Corinna Massiet	Baking & Pastry
550	Oscar Matamoros	Culinary Arts
551	Jennifer Anne Mateo	Culinary Arts
552	Guillermo Maxwell	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
553	Hilda Maynez	Baking & Pastry
554	Christine Mazakian	Culinary Arts
555	Vickie Mcdougal	Baking & Pastry
556	Connal Mceniry	Culinary Arts
557	Tracy Mcfarlin	Culinary Arts
558	Natalie Mcfee	Baking & Pastry
559	Robert Mccahey	Culinary Arts
560	Gia Nicole Mckee	Culinary Arts
561	Colin Mcravey	Culinary Arts
562	Jeffrey Mcvica	Culinary Arts
563	Elizabeth Medina	Baking & Pastry
564	Stephanie Medrano	Culinary Arts
565	Roman Mejia	Culinary Arts
566	Gabriel Melchor	Culinary Arts
567	Lizette Melgoza	Baking & Pastry
568	Hezikiah Menacho	Culinary Arts
569	Jose A. Mendez	Culinary Arts
570	Roberto Mendez	Culinary Arts
571	Tammy Mendoza	Culinary Arts
572	Rose Meneses	Culinary Arts
573	Tomas Meneses	Culinary Arts
574	Linda Mepokee	Baking & Pastry
575	Daniela Mercado	Culinary Arts
576	Michael Mergil	Baking & Pastry

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
577	Johanna Merida	Culinary Arts
578	Linda Merino	Culinary Arts
579	Chad Merrell	Culinary Arts
580	Holly Messenger	Culinary Arts
581	Melissa Middle	Culinary Arts
582	Debra Mikk	Culinary Arts
583	Damien Milbauer	Culinary Arts
584	Brian Min	Culinary Arts
585	Brian Miranda	Culinary Arts
586	Carmen Miranda	Culinary Arts
587	Jacqueline Mireles Hernandez	Culinary Arts
588	Luis Molina	Culinary Arts
589	Nicholas Moncada	Culinary Arts
590	Cynthia Monroy	Culinary Arts
591	Diego Montano	Baking & Pastry
592	Ivan Montano	Culinary Arts
593	Jessica Montano	Culinary Arts
594	Jason Montelibano	Culinary Arts
595	Natashia Montenegro	Baking & Pastry
596	Jose Monterrosa	Culinary Arts
597	Candice Montes Perez	Culinary Arts
598	Shandy Mooney	Culinary Arts
599	Daniel Moore	Culinary Arts
600	Daisy Mora	Baking & Pastry

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
601	Brenda Morales	Culinary Arts
602	Kevin Morales	Culinary Arts
603	Susy Morales	Baking & Pastry
604	Yohana M Morales	Culinary Arts
605	Maria Moran	Culinary Arts
606	Cynthia Moreau	Culinary Arts
607	Desiree Moreno	Culinary Arts
608	Danny Morey	Culinary Arts
609	Lauren Morimoto	Culinary Arts
610	Timothy Morita	Culinary Arts
611	Ernest Morris	Culinary Arts
612	Christopher Morrison	Culinary Arts
613	Lindsay Morrow	Culinary Arts
614	Justin Moscovitz	Culinary Arts
615	Laura Moua	Culinary Arts
616	Ermer Munar	Culinary Arts
617	Nellida Munguia	Baking & Pastry
618	Nicholas Munn	Culinary Arts
619	Adah Munoz	Culinary Arts
620	Michael Munoz	Culinary Arts
621	Nasera Munshi	Culinary Arts
622	Albert Murphuy	Culinary Arts
623	Stephani Murphy	Culinary Arts
624	Jessica Murray	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
625	Erin Najera-Torres	Baking & Pastry
626	Andy Najpauer	Culinary Arts
627	Daniela Nava	Baking & Pastry
628	Zareh Nazaryan	Culinary Arts
629	Stellah Ndahura	Culinary Arts
630	Kristian Nelson	Culinary Arts
631	Sarena Nelson	Culinary Arts
632	Christaley Nesbitt	Culinary Arts
633	Stefanie Nevarez	Culinary Arts
634	Thom Neville	Culinary Arts
635	Alyson Nevins	Culinary Arts
636	Torcy Newcombe	Culinary Arts
637	Charmel Newell	Culinary Arts
638	April Newton	Culinary Arts
639	John Newton	Culinary Arts
640	Hoan Nguyen	Culinary Arts
641	Bobak Nikoo	Culinary Arts
642	Damon Nimmers	Culinary Arts
643	Julie Noble	Baking & Pastry
644	Nicole Nolasco	Baking & Pastry
645	Stephanie Rose Norcio	Baking & Pastry
646	Kierster Norman	Culinary Arts
647	Jordan Norona	Culinary Arts
648	Richard Nowak	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
649	George Nunez	Culinary Arts
650	Aubrey Nurse	Culinary Arts
651	Jennifer Oh	Baking & Pastry
652	Monica Olaes	Culinary Arts
653	Aaron Olch	Culinary Arts
654	Leoloy Olmedo	Culinary Arts
655	Samantha Omar	Culinary Arts
656	Toni O'Neill	Culinary Arts
657	Desirae Ontiveros	Baking & Pastry
658	Fernando Orizondo	Culinary Arts
659	Guadalupe Ortega	Culinary Arts
660	Cynthia Ortiz	Culinary Arts
661	Oscar Ortiz Jr	Culinary Arts
662	Donna Osborn	Baking & Pastry
663	Shane Osborn	Culinary Arts
664	Alana O'Shea	Culinary Arts
665	Lili Ostrow	Baking & Pastry
666	James Otero	Culinary Arts
667	George Outten	Culinary Arts
668	Travis Ozier	Culinary Arts
669	Jonathan Pace	Culinary Arts
670	Jonathan Pacheco	Culinary Arts
671	Luis Padilla	Baking & Pastry
672	Tracy Padilla	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
673	Orlando Paez	Culinary Arts
674	Andrew Palacios	Culinary Arts
675	Andrew Palmer	Culinary Arts
676	Nicole Palmer	Culinary Arts
677	Steven Papa	Culinary Arts
678	Andres Paredes	Culinary Arts
679	Sarah Park	Culinary Arts
680	Matthew Parker	Culinary Arts
681	Angel Parra	Culinary Arts
682	Kristin Pass	Culinary Arts
683	Elizabeth Pastor	Culinary Arts
684	Kevin Patiag	Culinary Arts
685	Elliot Patti	Culinary Arts
686	Ashley Patton	Culinary Arts
687	Karen Paulk	Culinary Arts
688	Samuel Paxson	Culinary Arts
689	Marcus Pedigo	Culinary Arts
690	Joseph Pelej	Culinary Arts
691	Sharon Pelley	Baking & Pastry
692	Justin Pena	Culinary Arts
693	Leroy Pena	Culinary Arts
694	Jennifer Pendergraft	Baking & Pastry
695	Mary Perdomo	Baking & Pastry
696	Anne-Marie Perea	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
697	Geoffrey Perea	Culinary Arts
698	Carlos Perez	Culinary Arts
699	Daniel Perez	Culinary Arts
700	Georgina Perez	Culinary Arts
701	Melissa Perry	Culinary Arts
702	Anette Pesantes	Baking & Pastry
703	Torie Pham	Baking & Pastry
704	Nathaniel Phillips	Culinary Arts
705	Regina Phillips	Baking & Pastry
706	Denise Pimentel	Baking & Pastry
707	Jessica Pina	Baking & Pastry
708	Yocelin Pinedo	Baking & Pastry
709	Brian Pirnat	Culinary Arts
710	Nicholas Piszton	Culinary Arts
711	Nicole Piszton Forde	Culinary Arts
712	Carolyn Player	Culinary Arts
713	Terrie Plesmid	Baking & Pastry
714	Patricia Pocock	Baking & Pastry
715	Steven Podrasky	Culinary Arts
716	Anthony Polanco	Culinary Arts
717	Michael Poloni	Culinary Arts
718	Karina Porcayo	Baking & Pastry
719	Robert Porter	Culinary Arts
720	Edna Portillo	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
721	Abraham Posada	Culinary Arts
722	Shahab Pourteymoor	Culinary Arts
723	Joshua Prados	Culinary Arts
724	Cristina Prescott	Baking & Pastry
725	Michael Protus	Culinary Arts
726	Tayler Pryce	Culinary Arts
727	Erin Puckett	Baking & Pastry
728	Sunni Puga	Baking & Pastry
729	Richard Purcella	Baking & Pastry
730	Hung Quan	Culinary Arts
731	Stephanie Quaye	Culinary Arts
732	Stephanie Quintana	Baking & Pastry
733	Jason Quintero	Culinary Arts
734	Lauren Ragay	Culinary Arts
735	Adam Ramirez	Culinary Arts
736	Carlos Ramirez	Culinary Arts
737	Marilin Ramirez	Culinary Arts
738	Carol Ramos	Culinary Arts
739	Ronaldo Ramos	Culinary Arts
740	Mandy Ramos-Veazey	Culinary Arts
741	Matthew Ranney	Culinary Arts
742	Peyman Rasi	Culinary Arts
743	Greg Recano	Culinary Arts
744	Candace Reddix	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
745	Lindsey Reedy	Baking & Pastry
746	Brian Reetz	Culinary Arts
747	Gilbert Regalado	Culinary Arts
748	April Regino	Baking & Pastry
749	Javier Renteria Olmedo	Culinary Arts
750	Kevin Rey	Culinary Arts
751	Angel Reyes	Culinary Arts
752	Daniel Reyes	Culinary Arts
753	Jose Reyes	Culinary Arts
754	Reuben Reyes	Culinary Arts
755	Yvon Reyes	Baking & Pastry
756	Christie Hester Reyes	Culinary Arts
757	Samantha Richards	Culinary Arts
758	Jason Rickards	Culinary Arts
759	Joel Riley	Culinary Arts
760	Stephanie Riley	Culinary Arts
761	Juan Rincon	Culinary Arts
762	Amanda Rion	Culinary Arts
763	Diana Rivera	Culinary Arts
764	Norma Rizo	Baking & Pastry
765	Thelbert Roark	Culinary Arts
766	Breck Roberts	Culinary Arts
767	Gustavo Roca	Culinary Arts
768	Elena Rodas	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
769	Rebeca Rodas Mejia	Culinary Arts
770	Alexander Rodriguez	Culinary Arts
771	Denyse Rodriguez	Baking & Pastry
772	Eric Rodriguez	Culinary Arts
773	Favian Rodriguez	Baking & Pastry
774	Gabriel Rodriguez	Culinary Arts
775	Irene Rodriguez	Culinary Arts
776	Janneth Rodriguez	Culinary Arts
777	Leticia Rodriguez	Culinary Arts
778	Luz Rodriguez	Culinary Arts
779	Patrcia Rodriguez	Culinary Arts
780	Ramona Rodriguez	Culinary Arts
781	Reno Rodriguez	Culinary Arts
782	Brittney Cadena Rodriguez	Culinary Arts
783	Amy Rogers	Baking & Pastry
784	Angela Rollon	Baking & Pastry
785	Daniel Roman	Culinary Arts
786	Abel Romero	Culinary Arts
787	Christina Romero	Baking & Pastry
788	Elaine Romero	Culinary Arts
789	Juan Romero	Culinary Arts
790	Alyssa Romo	Culinary Arts
791	Andres Ronge	Culinary Arts
792	Adriana Rosales	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
793	Carrie Rosebraugh	Culinary Arts
794	David Rosenthal	Culinary Arts
795	Eleana Rosenthal	Baking & Pastry
796	Anthony Roske-Pamaran	Culinary Arts
797	Carol Ross	Culinary Arts
798	Maria Victoria Ross	Culinary Arts
799	Sandra Ross	Culinary Arts
800	David Ruivo	Culinary Arts
801	Alvaro Ruiz	Culinary Arts
802	Daniel Ruiz	Culinary Arts
803	Nicole Ruiz	Culinary Arts
804	Robert Ruiz	Culinary Arts
805	Roy Ruiz	Culinary Arts
806	Raymond Ruotolo	Culinary Arts
807	Michael Rupp	Culinary Arts
808	Kristin Rush	Culinary Arts
809	Jaime Salas	Culinary Arts
810	Carmen Salazar	Culinary Arts
811	Josue Salazar	Culinary Arts
812	Yessica Salazar	Culinary Arts
813	Robert Saldana	Culinary Arts
814	Mohajer Samakar	Culinary Arts
815	Jillian Sammetinger	Baking & Pastry
816	Eric Sanchez	Culinary Arts

## APPENDIX

No.	Full Name	Program
817	Hernan Sanchez	Culinary Arts
818	Jorge Sanchez	Culinary Arts
819	Jose Sanchez	Culinary Arts
820	Juan Sanchez	Culinary Arts
821	Leyla Sanchez	Culinary Arts
822	Meylin Sanchez	Culinary Arts
823	Rodolfo Sanchez	Culinary Arts
824	Stephanie Sanchez	Baking & Pastry
825	Valerie Sanchez	Baking & Pastry
826	Michelle Sanchez Sandoval	Baking & Pastry
827	Jayro Sandoval	Culinary Arts
828	Jorge Sandoval	Culinary Arts
829	Salvatore Sanmarco	Culinary Arts
830	Nubia Santiago	Culinary Arts
831	Ruben Santiago	Culinary Arts
832	Regina Santos	Culinary Arts
833	Ismawaty Sanusi	Culinary Arts
834	Bianca Sapozhnikov	Baking & Pastry
835	Frances Sau	Culinary Arts
836	Tulvinder Saund	Culinary Arts
837	Jacob Sawyer	Culinary Arts
838	Shaun Sawyer	Culinary Arts
839	Steven Scallion	Culinary Arts
840	Kathryn Schaffer	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
841	Andrew Schick	Culinary Arts
842	Michael Schullo	Culinary Arts
843	Christopher Seery	Baking & Pastry
844	Ashlie Seitz	Culinary Arts
845	Sam Sek	Culinary Arts
846	Jonathan Shannon-Bernardy	Culinary Arts
847	Kirby Shao	Culinary Arts
848	Michael Shen	Culinary Arts
849	Tasha Sherley	Culinary Arts
850	David Shin	Culinary Arts
851	Iman Shirvays	Culinary Arts
852	Jacqueline Silay	Culinary Arts
853	Gregg Silk	Culinary Arts
854	Bonnie Silva	Culinary Arts
855	Estevan Silva	Culinary Arts
856	Isaac Silva	Culinary Arts
857	Justin Silva	Culinary Arts
858	Robrich Sim	Culinary Arts
859	Tim Simanek	Culinary Arts
860	Rebekah Sims	Culinary Arts
861	Kathleen Singh	Culinary Arts
862	Allison Sirignano	Culinary Arts
863	Amber Smiley	Culinary Arts
864	Donna Marie Smith	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
865	Garrison Smith	Culinary Arts
866	Jayson Smith	Culinary Arts
867	Michael David Smith	Culinary Arts
868	Sharon Smith-Lerner	Culinary Arts
869	Jesus A Solis Jr	Culinary Arts
870	Nopdol Soonthonthum	Culinary Arts
871	Rosann Sosa	Culinary Arts
872	Ronni Sparks	Culinary Arts
873	Lucas Spenser	Culinary Arts
874	Shannon Sprague	Baking & Pastry
875	Martin Stampler	Culinary Arts
876	Donald Stansell	Culinary Arts
877	Andrew Starnes	Culinary Arts
878	Steven Stearns	Culinary Arts
879	Lorrae Steven	Baking & Pastry
880	Theresa Stevens	Baking & Pastry
881	Donna Stewart	Culinary Arts
882	Jay Stine	Culinary Arts
883	Heidi Strickland	Culinary Arts
884	John Strople	Culinary Arts
885	Olivia Strople	Culinary Arts
886	Jodi Strzebkowski Nelson	Culinary Arts
887	Nathaniel Sudbury	Culinary Arts
888	Rolando Sunga Iii	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
889	Andrew Sutton	Culinary Arts
890	Eric Swab	Culinary Arts
891	Alicia Sweeting	Culinary Arts
892	Aaron Takao	Culinary Arts
893	Jeffry Talmage	Culinary Arts
894	Ching Kok Tony Tam	Baking & Pastry
895	Alexandra Tamayo	Baking & Pastry
896	Veronica Tamura	Baking & Pastry
897	Teresa Tang	Culinary Arts
898	Lawrence Taylor	Culinary Arts
899	Travis Taylor	Culinary Arts
900	Christopher Teague	Culinary Arts
901	Tiffany Teeravatya	Baking & Pastry
902	Lucia Tejeda-Riesenbeck	Culinary Arts
903	Lisa Thayer	Culinary Arts
904	Thongkasame Theara	Culinary Arts
905	Arica Thomas	Baking & Pastry
906	Shane Thomas	Culinary Arts
907	Alicia G. Thompson	Baking & Pastry
908	Karli Thompson	Culinary Arts
909	Sean Thomsen	Baking & Pastry
910	Chantal Thornton	Baking & Pastry
911	Kenneth Tianen	Culinary Arts
912	Naomi Tirronen	Baking & Pastry

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
913	Jayson Tompson	Culinary Arts
914	Cynthia Topete	Culinary Arts
915	Grigor Torosyan	Culinary Arts
916	Anna Toscano	Culinary Arts
917	Anthony Tovar	Culinary Arts
918	Christine Tran	Baking & Pastry
919	Hung Tran	Culinary Arts
920	Jenny Tran	Baking & Pastry
921	Donna Trinh	Culinary Arts
922	Heather Trotter	Baking & Pastry
923	Jacqueline Trout	Culinary Arts
924	Nancy Tsai	Culinary Arts
925	Vahe Tsarukyan	Culinary Arts
926	Evan Tsuchiyama	Culinary Arts
927	Russell Tuazon	Culinary Arts
928	Whitney Tucker	Baking & Pastry
929	Vigen Tumoyan	Culinary Arts
930	Tim Tyler	Culinary Arts
931	George Tze-Polo	Culinary Arts
932	Crystal Upton	Culinary Arts
933	Victor Urbina	Culinary Arts
934	Daniel Uribe	Culinary Arts
935	Sonia G. Uribe	Baking & Pastry
936	Nicole Urman	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
937	Jessica Urquiza	Culinary Arts
938	David Valdez	Culinary Arts
939	Marie Valdez	Baking & Pastry
940	Rocio Valdez	Baking & Pastry
941	David Valencia	Baking & Pastry
942	Erwin Valencia	Baking & Pastry
943	Jeniffer Valenzuela	Culinary Arts
944	Marisela Valenzuela Gonzalez	Culinary Arts
945	Lamar Valladares	Culinary Arts
946	Claudia Vanbeekom	Culinary Arts
947	Joseph Vanover	Culinary Arts
948	Oscar Varela	Culinary Arts
949	Abel Vargas	Culinary Arts
950	Ernesto Vargas	Culinary Arts
951	Isaac Vargas	Culinary Arts
952	Daniel Vasquez	Culinary Arts
953	Esteban Vasquez	Culinary Arts
954	Jamie Vasquez	Culinary Arts
955	Katherine Vasquez	Culinary Arts
956	Nicholas Vasquez	Culinary Arts
957	Raymond Vasquez	Culinary Arts
958	Jimena Vazquez	Baking & Pastry
959	Jason Velasco	Culinary Arts
960	Eric Velasquez	Culinary Arts

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
961	Nelly Velazquez	Baking & Pastry
962	Alexandra Velez	Baking & Pastry
963	Ryan Velilla	Culinary Arts
964	Jesus Venegas	Culinary Arts
965	Pannipa Vera	Baking & Pastry
966	Vanessa Verduzco	Baking & Pastry
967	Victor Vides	Culinary Arts
968	Jaocb Viggiano	Culinary Arts
969	Rene Villalobos	Culinary Arts
970	Eric Villegas	Culinary Arts
971	Peter Villegas	Culinary Arts
972	Francisco Vizcarra Jr.	Culinary Arts
973	Diana Vu	Culinary Arts
974	Adam Waddell	Culinary Arts
975	Maxine Wagner	Baking & Pastry
976	Kerri Waldo	Culinary Arts
977	Alexandra Wallen	Culinary Arts
978	Christina Walton	Culinary Arts
979	Sarah Ward	Culinary Arts
980	Joy Watkins	Culinary Arts
981	Brandi Watson	Culinary Arts
982	Jessica Waugh	Culinary Arts
983	Janet Weiss	Baking & Pastry
984	Jacqueline Wells	Baking & Pastry


## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
985	Stephen Wells	Culinary Arts
986	Janet Weyer	Culinary Arts
987	Stacie Wheelock	Culinary Arts
988	Alan Whitcomb	Culinary Arts
989	Dennis White	Culinary Arts
990	Jena White	Culinary Arts
991	Marissa White	Baking & Pastry
992	Vickie Whitecotton	Baking & Pastry
993	Chad Whitmer	Culinary Arts
994	Christopher Whitney-Morrison	Culinary Arts
995	Kyran Wiley	Culinary Arts
996	Emily Williams	Culinary Arts
997	Lorren Williams	Culinary Arts
998	Tahesha Williams	Culinary Arts
999	Jaime Williams Jr.	Culinary Arts
1000	Amanda Wilson	Culinary Arts
1001	Christopher Wilson	Culinary Arts
1002	Joe Wilson	Culinary Arts
1003	Carrie Wojcik	Culinary Arts
1004	Brandy Wong	Baking & Pastry
1005	Ashleigh Wright	Culinary Arts
1006	Courtney Wright	Baking & Pastry
1007	Garrett Wright	Culinary Arts
1008	Abigale Wulff	Baking & Pastry

## APPENDIX

<b>No.</b>	<b>Full Name</b>	<b>Program</b>
1009	Stephanie Ximenez-Calderon	Baking & Pastry
1010	Christine Yaacoubian	Baking & Pastry
1011	Eric Ybarra	Culinary Arts
1012	Hong-Ki Yoon	Baking & Pastry
1013	Susan Yoon	Culinary Arts
1014	Thangsy Yort	Culinary Arts
1015	Michele Yoshimura	Culinary Arts
1016	Jonathan Young	Culinary Arts
1017	Tania Young	Culinary Arts
1018	Wynn A. Young	Culinary Arts
1019	Brandon Yurt	Culinary Arts
1020	Paul Zamudio	Culinary Arts
1021	Venus Zavala	Culinary Arts
1022	April Zekis	Culinary Arts
1023	Keren Zuniga	Culinary Arts
1024	Michele Zurcher	Baking & Pastry

LE CORDON BLEU



TRAIN TO BECOME A PROFESSIONAL CHEF AT  
CALIFORNIA SCHOOL OF CULINARY ARTS.

- FLEXIBLE SCHEDULES AVAILABLE -  
- WEEKEND CLASSES AVAILABLE FOR OUR BAKERY & PATISSERIE PROGRAM -

*csc*  
CALIFORNIA SCHOOL OF CULINARY ARTS  
LE CORDON BLEU PROGRAMS  
1-888-900-2433  
www.calchef.com • www.chefingmt.com

**YES!** Please send me information on  
the Le Cordon Bleu programs.

name \_\_\_\_\_  
address \_\_\_\_\_  
city \_\_\_\_\_  
state/zip \_\_\_\_\_  
phone ( ) \_\_\_\_\_  
best time to call \_\_\_\_\_  
e-mail \_\_\_\_\_

*I have a friend who might be interested in learning about CSCA:*  
name \_\_\_\_\_  
address \_\_\_\_\_  
city/state/zip \_\_\_\_\_  
phone ( ) \_\_\_\_\_

My interest is in the  
following Le Cordon  
Bleu program(s):


- ☐ 15-month Culinary Arts  
AOS Degree Program
- ☐ 30-week Patisserie &  
Baking Diploma Program
- ☐ 45-week Patisserie &  
Baking Diploma Program
- ☐ 12-month Hospitality &  
Restaurant Management  
Diploma Program

And Also...

- ☐ I would like to arrange  
for a tour of the campus
- ☐ I would like to arrange  
an interview with an  
admissions representative

LAT 504

LE CORDON BLEU...  
THE HIGHEST ACHIEVEMENT IN CULINARY ARTS




*csc*  
CALIFORNIA SCHOOL  
OF CULINARY ARTS  
LE CORDON BLEU PROGRAMS

**BUSINESS REPLY MAIL**  
FIRST CLASS MAIL PERMIT NO. 4458 PASADENA, CA  
POSTAGE WILL BE PAID BY ADDRESSEE

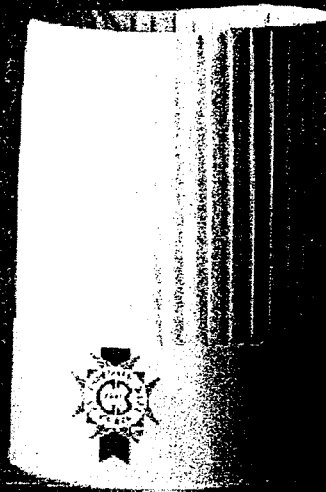
NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

CALIFORNIA SCHOOL OF CULINARY ARTS  
521 E GREEN ST  
PASADENA CA 91101-9708



CSCAP00002097

Everything goes with white.  
Especially success.



California School of Culinary Arts – 15-month Culinary Arts AOS Degree.  
The opportunities are endless. You'll gain more expertise in 15 months than in years of working your way up the culinary ladder. You can graduate a Le Cordon Bleu level culinary chef and enter a world where your skills are both respected and sought after. Get ready for a career of high-energy and personal fulfillment.



**Le Cordon Bleu Diploma  
Programs offered:**

15-month Culinary Arts AOS Degree  
30-week Patisserie & Baking  
12-month Hospitality &  
Restaurant Management.

Financial Aid available for those who qualify.  
Accredited member, AOC's. Veterans approved.



California School  
of Culinary Arts  
*Le Cordon Bleu Program*  
521 East Green Street  
Pasadena, CA 91101

Call Today 866.670-3663  
[www.cscs.edu](http://www.cscs.edu)



## Careers

---

- Sommelier
- Buyer/Purchasing
- Chocolatier
- Executive Chef
- Sous Chef
- Personal Chef
- Pastry Chef
- Saucier
- Restaurant Manager
- Restaurant Owner
- Hotel Manager
- Banquet Manager
- Caterer
- Food Critic or Writer
- Consultant
- Food Stylist

[www.go-csca.com](http://www.go-csca.com)

CSCAP00005941



## California School of Culinary Arts

*Le Cordon Bleu Programs*

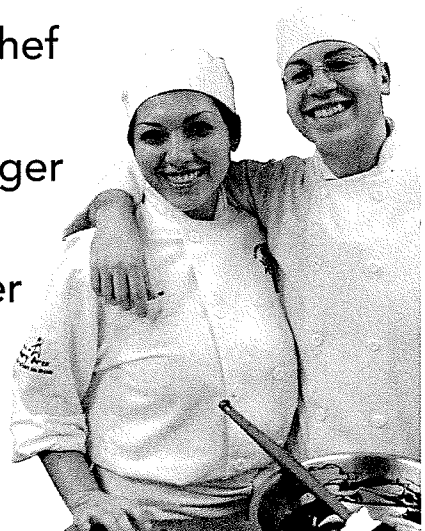


521 E. Green Street  
Pasadena, CA 91101

**1-888-900-2433**  
**www.calchef.com**

# Careers in the Culinary Arts

- Banquet Chef
- Food & Beverage Manager
- Corporate Executive Chef
- Food Writer
- Food Stylist
- Recipe/Cookbook Editor
- Culinary Author
- Restaurant Consultant
- Television Chef
- Radio Talk Show Host
- Television Culinary Producer
- Country Club Manager
- Dietary Chef Supervisor
- Resort/Cruise Chef
- Event Planner/Manager
- Chef/Owner
- Personal Chef
- Garde Manger Chef
- Pastry Chef
- Restaurant Manager
- Executive Chef
- Catering Manager
- Caterer
- Chocolatier



# The Culinary & Hospitality Industry means opportunity!



## The second largest employer in the U.S.

- American restaurants and eating establishments employ 12.5 million people – the second largest employer in the U.S.
- In 2006, the industry's 925,000 locations will serve 70 billion meals and snacks
- Close to 50¢ of every food dollar will be spent in restaurants

The Hospitality Industry takes care of hundreds of thousands of business men and women and families!

- The Hospitality Industry employs more than 1.8 million people
- Over 60,000 establishments are in the industry
- Hospitality professionals work in restaurants, spas, hotels & cruise lines

Sources: [www.careervoyages.gov/hospitality-main.cfm](http://www.careervoyages.gov/hospitality-main.cfm)

- Chef
- Caterer
- Catering Manager
- Personal Chef
- Garde Manger Chef
- Pastry Chef
- Pastry Manager
- Banquet Chef
- Corporate Chef
- Restaurant Manager
- Hotel Manager

# Careers



California School  
of Culinary Arts  
Le Cordon Bleu Programs

In the

# Culinary Arts

Banquet Chef  
Food & Beverage Manager  
Corporate Executive Chef

Food Writer

Food Stylist

Recipe/Cookbook Editor

Culinary Author

Restaurant Consultant

Internet Chef

Television Chef

Radio Talk Show Host

Television Culinary Producer

Country Club Manager

Dietary Chef Supervisor

Resort/Cruise Chef

Event Planner/Manager

Chef/Owner

Personal Chef

Garde Manger Chef

Pastry Chef

Restaurant Manager

Executive Chef


Caterer


Catering Manager

Chocolatier

California School of Culinary Arts – Le Cordon Bleu Programs

521 E. Green St. Pasadena, CA 91101

 [www.go-csca.com](http://www.go-csca.com)

 1-888-900-2433



# ***Career Choices***

**The Bleu Sky is  
the Limit**



- Caterer
- Catering Manager
- Chef/Owner
- Personal Chef
- Garde Manger Chef
- Pastry Chef
- Banquet Chef
- Butcher
- Corporate Chef
- Culinary Trainer
- Restaurant Consultant
- Chocolatier
- Restaurant Manager
- Country Club Manager
- Dietary Chef Supervisor
- Resort/Cruise Chef
- Event Planner/Manager
- Sommelier
- And much more...





California School  
of Culinary Arts  
Le Cordon Bleu Programs



## Top Ten Reasons to Attend California School of Culinary Arts

### 1. **Le Cordon Bleu**

Since its founding in Paris in 1895, Le Cordon Bleu has produced some of the world's finest chefs, and continues to be dedicated to promoting the advancement of education, training and the appreciation of cuisine and hospitality management worldwide.

### 2. **Reputation**

Through its strong affiliation with the American Culinary Federation and its partnership with Le Cordon Bleu International, California School of Culinary Arts has a deserved reputation for educational excellence.

### 3. **Outstanding Faculty**

As the largest provider of quality culinary education in the world, our faculty boasts a fraternity that spans five continents. Our consistent co-teaching approach, which emphasizes cross-training and regular guest faculty from Le Cordon Bleu International, ensures our students a global perspective.

### 4. **Programs**

Comprehensive, well-rounded training in multiple areas of the culinary and hospitality industries: Le Cordon Bleu Culinary Arts Associates of Occupational Studies Degree, Le Cordon Bleu Patisserie & Baking Diploma, Le Cordon Bleu Hospitality & Restaurant Management Diploma. These programs allow students to plan on a consistent schedule throughout the year. Culinary and Patisserie & Baking students have the flexibility to attend morning, mid-day or evening programs.

### 5. **Competency-Based**

Students in the culinary program receive training in over 450 competency-based culinary proficiencies. All programs finish with a practical, structured externship in a property related to their career. Our externship coordinators work with properties throughout the nation and foreign countries to set up externships, many of which lead to full-time employment upon graduation.

### 6. **Career Services**

Since 1994, our Career Services department has been developing a national and international network of positive industry contacts for current students and graduates and boasts an impressive list of current and past placements at some of the finest establishments in the world. [Click here](#) to view a list of some of our recent placements.

### 7. **Campus Location**

CSCA's centralized location within Pasadena allows students easy access to the booming Southern California wine industry and organic movement: the wine-growing regions of both Temecula and the Santa Inez Valley are within easy driving distance of the school; outdoor farmers markets abound; access to local growers to provide the freshest and highest quality foods to work with.

### 8. **Pasadena**

A case-study example of vibrant city life, Pasadena is a fashionable, artistic community that values education and new ideas. Along with CSCA, world-renowned colleges and universities such as the Art Center College of Design, Cal Tech, and Fuller Theological Seminary provide a stimulating environment for all those who call Pasadena home. The city offers a comfortable blend of friendly, tree-lined neighborhoods, parks, shopping, restaurants, and nightlife, and is easily accessible by freeway and light rail. A wide range of housing opportunities are available here and in neighboring communities.

### 9. **Los Angeles, CA**

A cultural and culinary melting pot, Los Angeles' vast geography boasts whole communities that provide authentic cuisine from every corner of the world. Home to celebrity chefs Wolfgang Puck, Susan Feniger, Mary Sue Milliken, Nancy Silverton, Nobu Matsuhisa, David Myers, Benjamin Ford, Suzanne Goin, Josiah Citrin (just to name a few), the City of Angels offers endless opportunities for the ambitious graduate.

### 10. **Southern California**

Southern California has literally defined the recreation and resort lifestyle for the past century. The varied industries that seek our graduates converge in this one area: four-star hotels & resorts, thousands of new restaurants, the cruise ship industry with the worldwide hub of Long Beach, the entertainment industry, the sports industry....the career options are endless. Additionally, the Southern California lifestyle is unbeatable: over 300 days of sunshine a year, miles of white sand beaches, and multiple mountain ranges all within Los Angeles city limits.



## Become a successful artist in just over a year.

California School of Culinary Arts – 15-month Culinary Arts AOS Degree.

You'll gain more expertise in 15 months than in years of working your way up the culinary ladder. You can graduate a Le Cordon Bleu level culinary chef and enter a world where your skills are both respected and sought after. Indulge your creativity. And begin a successful career that challenges and rewards you every day.



Le Cordon Bleu Diploma  
Programs offered:

15-month Culinary Arts AOS Degree  
30-week Patisserie & Baking  
12-month Hospitality &  
Restaurant Management.

Financial Aid available for those who qualify.  
Accredited member, AACC. Veteran approved.



California School  
of Culinary Arts  
Le Cordon Bleu Program  
521 East Green Street  
Pasadena, CA 91101

Call Today 866.670-3663  
[www.cscs.edu](http://www.cscs.edu)

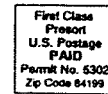


Some of the great chefs of the past 100 years received Le Cordon Bleu culinary training. You can, too.

**Go to [CalChef.com/survey](http://CalChef.com/survey) and take a quick interest survey.**

Find out if a rewarding career as a highly-trained culinary magician could be right for you.

California School of Culinary Arts  
521 E. Green Street  
Pasadena, CA 91101  
[www.CalChef.com/survey](http://www.CalChef.com/survey)  
866-293-4484



May B Doe  
123 Anystreet, 3-E  
Yorton, SM 12345-6789  
|||||

506862C

CSCAP00005872

# How you dress on the weekend could change your life.



Introducing the Weekend Patisserie & Baking Program at the California School of Culinary Arts. Work a fantastic new career into your busy schedule in only 90 days, through our accelerated weekend program. You'll graduate a Le Cordon Bleu level pastry chef, in an artistic field where your skills are in demand and the sky's the limit. That's a career to be proud of. Call today to guarantee enrollment. And dress for success on the weekends.

**Call Today 888.900.2433**

Visit [CalChef.com](http://CalChef.com)



Le Cordon Bleu Diploma Programs offered:

15-month Culinary Arts AOS Degree

30-week Patisserie & Baking

12-month Hospitality & Restaurant Mgmt.

Financial Aid available for those who qualify.  
Accredited member ACIS and veteran approved.

**California  
School of  
Culinary Arts**

P A S A D E N A



512 East Green Street, Pasadena, CA 91101

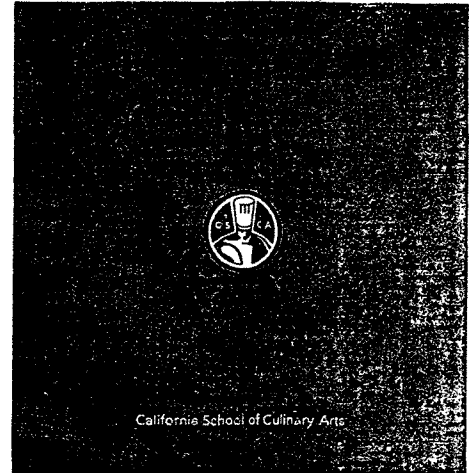
Turn the heat up on your career.  
Le Cordon Bleu Pâtisserie & Baking

Create your own path to success through your passion for baking. Become a Le Cordon Bleu level pastry chef in an artistic field where your skills are in demand and the sky's the limit.

Give rise to your success.

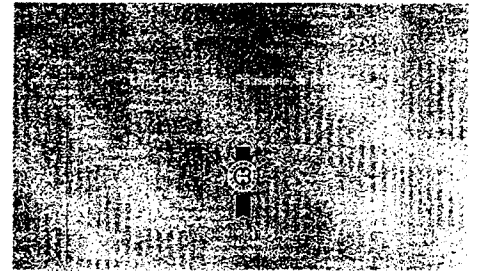
Whether you've ever dreamed of owning your own bakery, cafe or special-occasion catering company, or become an executive level pastry chef for a four-star restaurant, the Le Cordon Bleu Pâtisserie & Baking Program at CSCA is perfect for you.

Our program encompasses a wide range of baking and pastry techniques, from old-world traditions to modern innovations. And by offering our comprehensive, accelerated program with flexible scheduling, you can be well on your way to your dream career in as little as one year.



California School of Culinary Arts

Your Future  
Looks Sweet.



**BUSINESS REPLY MAIL**  
FIRST-CLASS MAIL PERMIT NO. 6488 PASADENA, CA  
POSTAGE WILL BE PAID BY ADDRESSEE

NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

CALIFORNIA SCHOOL OF CULINARY ARTS  
Le Cordon Bleu Pâtisserie & Baking Program  
Admissions Office  
521 E. Green Street  
Pasadena, CA 91101

CSCAP00002071



# CALIFORNIA SCHOOL OF CULINARY ARTS

521 E. Green Street • Pasadena, CA 91101  
Toll-free 1-866-293-4484 • [www.calchef.com/dmi](http://www.calchef.com/dmi)



Dear «First»,

Senior year is about to begin—what better time to start exploring your career options. Like considering your interest in the culinary arts. It's true, a gourmet lifestyle can be yours after high school...if you know where to start.

*If you're the kind of person who has always dreamed of becoming a professional chef, we can help turn your dream into a reality...at the California School of Culinary Arts.*

Located just 20 minutes from downtown LA at the base of the San Gabriel mountains in beautiful Pasadena, the California School of Culinary Arts is one of the most well-known and respected schools to learn the classic and contemporary techniques of Le Cordon Bleu Culinary Arts. At CSCA, you'll enjoy an ideal environment to develop your own signature style and gain the valuable experience you need for an exciting career in the culinary arts.

CSCA is committed to your success on many levels, including:

- Dedicated career placement assistance for all graduates.
- Top-notch instruction from skilled chefs, helping you develop your own style.
- Flexible class schedules offered days, afternoons and evenings.
- Financial aid for those who qualify, and tuition planning assistance is available to all students.

«First», in less time than you think, you could turn your interest in the culinary arts into a rewarding career after high school. Call California School of Culinary Arts, toll-free at 1-866-293-4484. Or better yet, fill out and return the attached reply slip in the enclosed, postage-paid envelope.

Sincerely,

*Tony Bondi*

Tony Bondi, President

P.S. «First», you can even develop your front-of-the-house skills with our Le Cordon Bleu Hospitality and Restaurant Management program—someday you may run the finest destination spot in the country. Call today, toll-free at 1-866-293-4484, to find out more.



Please complete this reply slip and detach here.

● X ✓

## California School of Culinary Arts

521 E. Green Street • Pasadena, CA 91101  
Toll-free 1-866-293-4484  
[www.calchef.com/dmi](http://www.calchef.com/dmi)

I'm interested in the following Le Cordon Bleu programs:

- ☐ Le Cordon Bleu Culinary Arts AOS Degree
- ☐ Le Cordon Bleu Hospitality & Restaurant Management Diploma
- ☐ Le Cordon Bleu Pâtisserie and Baking Diploma

«First» «Last»

488 E. Winchester St., Ste. 100  
Salt Lake City, UT 84107-7523

Enter the code, from the list above, of the programs that interest you.

084140

CS

DM

50225ABC

## Masters and mentors.

Courses are taught at successive levels under the technical guidance and close supervision of our skilled faculty.

These well-educated, seasoned instructors bring invaluable real world experience and perspective into the classroom. Not only are they dynamic, interesting teachers, they're involved and supportive people—inspiring our students to discover their own creativity and to excel at the craft of culinary arts.

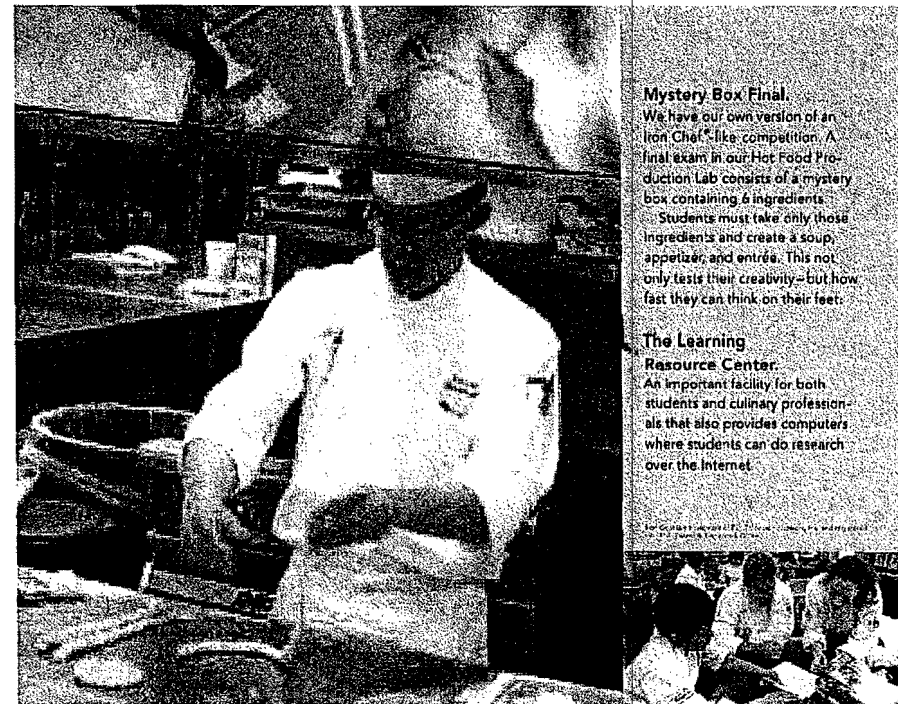


## Where we separate the chefs from the cooks.

Our Pasadena campus, located in the historic Playhouse District, is only 20 minutes from Downtown LA and features our Culinary Arts AOS, Pâtisserie & Baking, and Hospitality & Restaurant Management programs.

This campus features the popular gourmet 561 Restaurant, where our students gain practical real world experience while showing off their skills. This building also houses The School Café and the Campus Cookstore. Excited, determined students flow through our hallways into our 20 lecture/teaching kitchen labs and 13 classrooms. Our labs feature industry-current commercial equipment and

are designed for maximum efficiency, usability, and comfort. They offer a great proving ground to replicate the kind of fast-paced environment our graduates will experience on the job. This is where our instructors demonstrate in detail the food preparation and cooking techniques required by classic recipes. And it's where our students learn first-hand how to master such techniques while finding their own distinctive style.



**Mystery Box Final.**  
We have our own version of an Iron Chef™-like competition. A final exam in our Hot Food Production Lab consists of a mystery box containing 6 ingredients. Students must take only those ingredients and create a soup, appetizer, and entrée. This not only tests their creativity—but how fast they can think on their feet.

**The Learning Resource Center.**  
An important facility for both students and culinary professionals that also provides computers where students can do research over the Internet.

## Featured Artists.

Our student and graduate population represent a wide spectrum of faces and ages. From graduates fresh from high school and junior colleges, to those embarking on second (and sometimes third) careers. From home-grown talent to students who've crossed state and international borders.

It starts with a passion. Our students are imaginative and motivated. And they seek career fulfillment and success. CSCA students are "have-to-be's." Not "wanna-be's."

"CSCA is a great place to explore all aspects of the restaurant industry. Whether you want to be a restaurant chef, a food stylist, a personal chef, a caterer, a pastry chef, or baker—it's all available here. It would take you forever in the real world to get that kind of exposure."

—Daniel V. Vinturi, Owner/Chef, AOS Restaurant, Los Angeles  
CSCA Graduate, 1992



### Holly Michener

Chef/Owner of Love That European Bakery in Arcadia, CA  
Provenance: Walnut, CA  
Degree: CSCA Culinary Arts AOS 2003

What made you decide to become a chef?  
I had two degrees in music—from Fullerton College and from Berklee. I always wondered what else I could do. I love to cook. Cooked for my roommates. Made pies in the dorm. Then a friend suggested I go to cooking school and with that, everything just clicked.

How did you open Love That European Bakery?

Chef George helped me get an externship at this long-established, successful, award-winning bakery in Arcadia. One day, the owner decided to retire and asked if I'd like to buy the business. I jumped at it. My instructors and even teachers I'd never had at CSCA offered to help me get the business going. I opened Love That European Bakery in April of 2003, before graduating from CSCA. Business is booming.

What kind of success do you dream of?  
I have more success than I ever imagined.

### Jason Ringer

CSCA Student/Culinary AOS  
Provenance: Logan, Utah

What made you decide to become a Chef?

I was always interested in cooking. Ever since I was kid, I would wake up on Saturday mornings and watch cooking shows instead of cartoons.

Who's your favorite CSCA Instructor?

I haven't had an instructor I haven't liked. I really like Chef Brad Owen. We're the same age. Same meat and potatoes kind of guys. He has a strong passion and we feed off each other.

What's your specialty?

I love to cook Italian food. Rolling out the pasta dough is very relaxing. It's all about passion and love. I'd love to work with Giada De Laurentis from the Food Network. She loves doing what she does and I've had a lot of success with her recipes.

What's your advice for new students?

There's a world of difference between enjoying cooking and wanting to be a chef.

Make sure you have a serious passion for what you do.

### Rebecca Asare-Bediako

CSCA Student/Pâtisserie & Baking  
Provenance: Ghana, West Africa

What do you love most about desserts?

I love the artistry of creating specialty cakes and custom pastries. For me, it's a combination of sculpting and painting, except the clay and paint are delicious. I love to see the ingredients come to life.

Who were your favorite CSCA instructors?

Chef Chin in Baking 101: She prepares you for what's ahead and makes you feel at home.

She's amazing.

Chef Beckett in Production: She opens the door for you to take risks and you can talk to her about anything.

What would you like to do after graduation?

I would like to work for a reputable Southern California specialty cake bakery—my dream job would be to work for Topoxios. My long-term goal is to create a bakery that specializes in artistic designs and classes for children to learn art through cooking.

How would you like a cooking magazine to describe you?

She spreads joy through her pastries.

### Mark Mollica

Sous Chef at La Vecchia Cucina in Santa Monica  
Provenance: Los Angeles, CA  
Degree: CSCA Culinary Arts AOS 2002

What made you decide to become a chef?

I always enjoyed cooking. I graduated from Loyola Marymount with a degree in marketing, but it just wasn't fulfilling. I still loved cooking for friends and family, so I enrolled in CSCA. It was the best decision I ever made. I really liked their program and their Le Cordon Bleu background.

Where did you do your externship?  
Sicily and Italy. First month was at a neighborhood seafood restaurant in Messina. Then two weeks at an agriturismo where they grow 85% of their produce and protein for the menu. Finally worked in Naples at the Georges Restaurant within the Grand Parker Hotel, a five star establishment. The whole time I kept a journal, took pictures and taped 15 hours of video as a reference guide.

What's your advice for new students?

Don't think you know everything. With cooking, you're always learning. It's a continuous education process because everything's always changing—the seasons, the ingredients, even tastes and preferences.

### Joyce Kim

CSCA Student/Hospitality and Restaurant Management  
Provenance: Fullerton, Orange County  
Degree: CSCA Culinary Arts AOS 2003

What made you decide to go to CSCA?  
I was actually looking up law schools on the Internet. In my family, after high school you go to college then graduate school. But then CSCA popped up on my screen and I requested more info. They called me the next day. I always wanted to go to culinary school. I knew my parents wanted law school for me, but they've been very supportive.

Why Hospitality and Restaurant Management?

I wanted to own my own business. My parents were in the hotel business for 25 years, so I grew up in it. It's completely better than a 9-5 job. I like the idea of meeting new people and I like to travel. Plus at CSCA, I get the best of both worlds—cooking and management.

Who was your favorite instructor?

Mark Phelan in Service and Beverage Service. You can always ask him questions. Everything he tells you really sinks in.

What's your advice for new students?  
I came out the best in every class because I had a passion. Every single day I'm loving it.

As long as you have the passion and the drive, you'll do well.

### Dean Mavrikis

Owner of Citrine Restaurant, Los Angeles, CA  
Provenance: New York  
Degree: CSCA Culinary Arts AOS 2003

What made you decide to become a chef?

I worked at my father's two restaurants, the Underwood Diner in Brooklyn, as well as managing Jonathan's, the family's Long Island restaurant. So I have this love of food and the restaurant business that's stayed with me. And I wanted to work with my brother, Peter, who is the Managing Partner of Citrine.

Describe Citrine.

It's a restaurant where people can count on having an elegant, casual, high-energy experience. Citrine has the mystique of historic Hollywood gathering spots. The food is elegant and simple without being one-dimensional. A good balance of ingredients. Every customer is treated like a VIP, and I want them walking out with big smiles on their faces from the whole experience.

How do you relax?

I dine out every chance I get. I love interacting with other chefs. Out here, competitors are friends and colleagues. It's not cutthroat.



Everything goes with a white jacket. Especially success.

With a career in the culinary arts, baking and pâtisserie, or hospitality management, the opportunities are endless.



Thousands of new restaurants, bistros, grills, high profile caterers, and hotels open every year.

Millions of potential customers are craving their next culinary adventure. In fact, the restaurant industry is the nation's largest retail employer. It has experienced robust and continued growth for more than 20 years. And job openings are expected to be strong, reaching a projected total of 13 million people, through 2010.

Imagine an exciting, high-energy career that can garner personal fulfillment, respect and fame. A profession that challenges and rewards you daily, feeds your passion for food and your thirst for adrenaline, and that allows your creative side the freedom to express itself and be appreciated. CSCA offers you the training and education required to take advantage of the diverse career opportunities found in the world of culinary arts and hospitality management.

# ROAD TO YOUR CAREER

JOB OR CAREER... THERE  
IS A BIG DIFFERENCE

## JOB

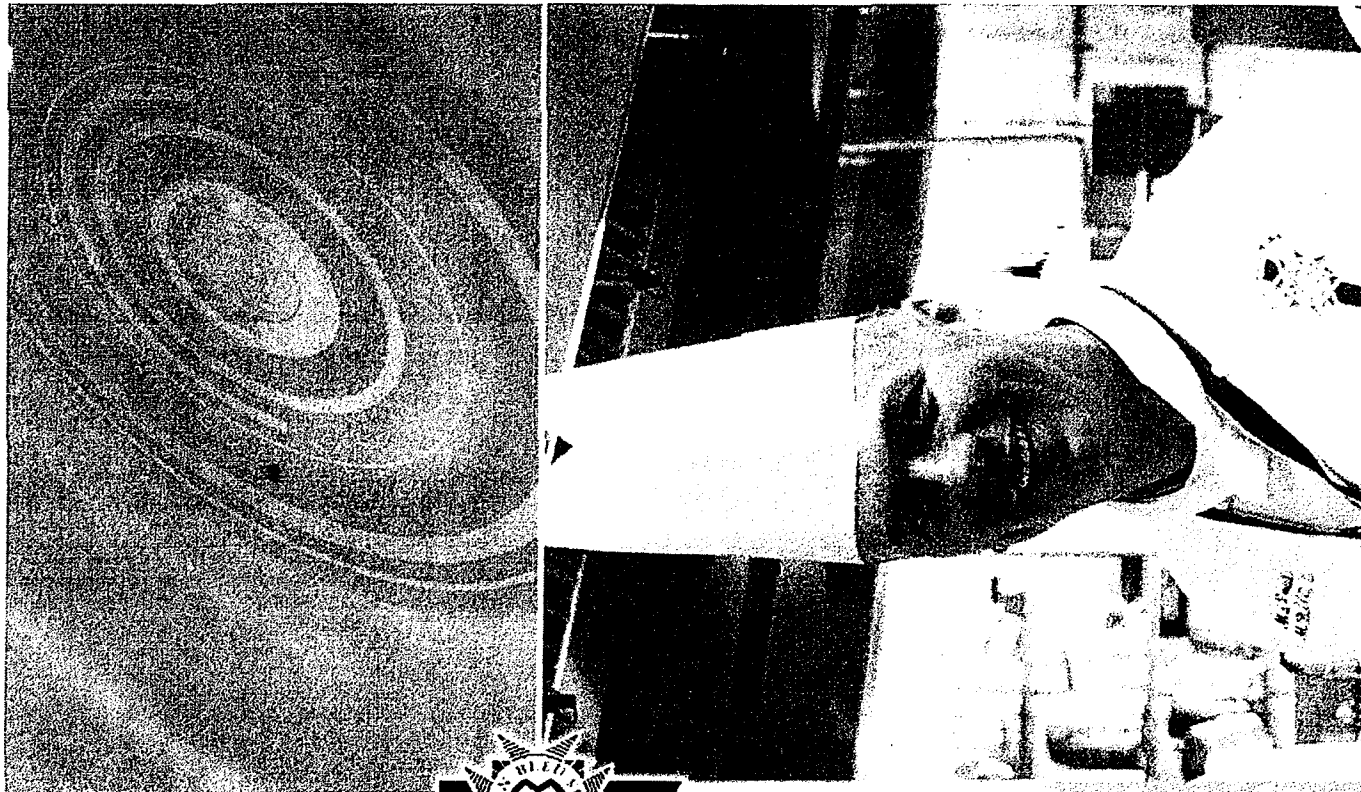
- Little or No Security
- Low Pay
- Small Raises
- Long Hours
- Few Opportunities



# ROAD TO YOUR CAREER

## CAREER

- Personal Professional Growth
- Competitive Pay
- Advancement Opportunities
- Challenging Work
- Employee Benefits



## The sky's the limit.

Upon graduation, you should be fully prepared to make your mark in the culinary and hospitality industries.

Our goal is to immediately help you find the best employment opportunity in your new career. CSCA has an aggressive, on-site job placement assistance agency that has a great track record for successful placements. You'll have global access to jobs both domestic and international. And employers welcome our graduates, because they know they're working with some of the best possible candidates.



Exhibit 18

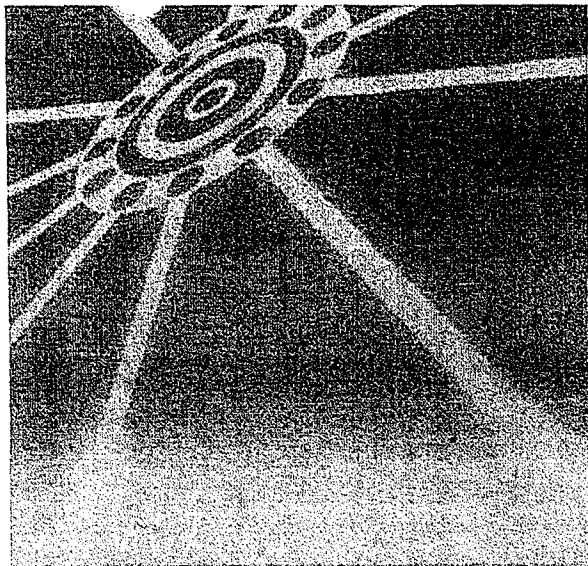


## The future is in your hands.


Craft the perfect career out of your passion. Take hold of your future. And create as much success with a career in culinary arts as you can imagine. It's all possible at the California School of Culinary Arts.

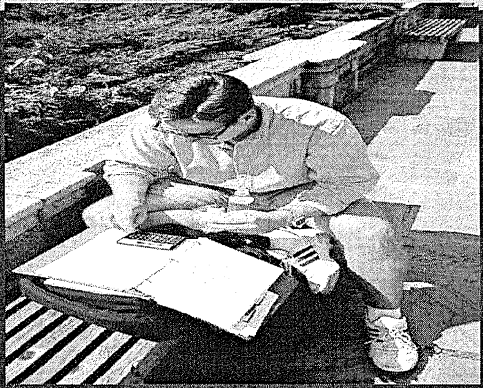
### Financing Options are Available.

CSCA offers both federal and state financial aid to those who qualify. Students also have access to various cash payment plans and alternative loan programs for financial assistance.



# Its Your Choice

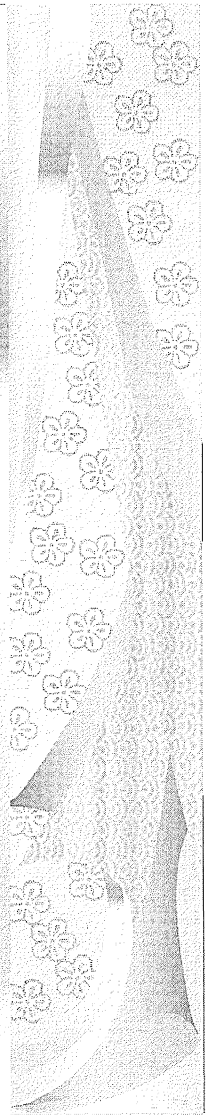
	Traditional / Four Year College	Junior / Community College	Military	
5 Years	\$	\$\$	\$\$	\$\$\$
4 Years	0	\$	\$	\$\$
3 Years	0	0	0	\$
2 Years	0	0	0	\$ / 0
1 Year	0	0	0	0



# Financing Your Education



*An Investment in  
Your Future.....*



CSCAP00001848

# CONGRATULATIONS!

- I'm your guide.
- You've chosen a wonderful school.
- You're making a great investment in your future.
- Today, we'll start the process of finding out how you can pay for your education.

CSCAP00001849



STATE AND CONSUMER SERVICES AGENCY • ARNOLD SCHWARZENEGGER, GOVERNOR  
**EXECUTIVE OFFICE**  
1625 North Market Boulevard, Suite 6-308, Sacramento, CA 95834  
P 916.574.8200 F 916.574.8613 | www.dca.ca.gov



**Voluntary Agreement for an Educational Institution**

Under the authority vested in the Director of the Department of Consumer Affairs ("Director") by Chapter 67 of the Statutes of 2007, the Director hereby enters into an agreement with the below-named educational institution. The below-named private postsecondary educational institution hereby agrees to comply with all of the following: state statutes, rules, and regulations pertaining to a private postsecondary institution or pertaining to a non-WASC regionally accredited institution as defined in Section 94740.5 of the Education Code, as it existed on June 30, 2007, in effect as of the close of business on June 30, 2007, that had a valid approval to operate or authorization pursuant to Section 94905 of the Education Code, as it existed on June 30, 2007, for the purpose of ensuring continued student protection after Chapter 7 (commencing with Section 94700) of Part 59 of Division 10 of Title 3 of the Education Code became inoperative. If executed timely, this agreement shall be effective retroactive to July 1, 2007.

**For Institution:**

Sign: [Signature] Date: 7/27/07

Name and Title: Anthony Bondi, President

(Please Print)

Name of Institution: Southern California School of Culinary Arts

Physical Address of Institution: DBA: California School of Culinary Arts

521 E. Green St.

Pasadena, CA 91101

BPPVE School Code: 1940391

**For Director:**

Sign: \_\_\_\_\_ Date: \_\_\_\_\_

Name and Title: \_\_\_\_\_

(Please Print)



Office of the President

California Department of Consumer Affairs  
VOLUNTARY AGREEMENT FOR AN EDUCATIONAL INSTITUTION

ADDENDUM

This document updates the Voluntary Agreement for an Educational Institution signed by Kitchen Academy, 6370 West Sunset Boulevard, Hollywood, California 90028 (BPPVE Code 57064382) on July 30, 2007.

On April 21, 2008, the Department of Consumer Affairs was notified that Kitchen Academy has changed its name to California School of Culinary Arts. This Voluntary Agreement should be updated to reflect this new name. All other terms and conditions as outlined by the DCA remain unchanged.

Submitted on behalf of the institution:

Anthony Bondi, President, California School of Culinary Arts

4/21/08

Date



California Culinary Federation  
Executive Office  
Le Cordon Bleu Programs

521 E. Green Street  
Pasadena, CA 91101  
direct: 626.229.1302  
fax: 626.585.0486  
www.calchef.com

1 PROOF OF SERVICE  
2 [CCP §§1010.6, 1011, 1013, 1013a, 2015.3; CRC 2.260, 2.306]  
3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

4 I, the undersigned, am employed in the County of Los Angeles, State of California. I am  
5 over the age of 18 and not a party to the within action. My business address is 2041 Rosecrans  
6 Avenue, Third Floor, El Segundo, California 90245. I am "readily familiar" with my employer's  
7 practice of collection and processing of correspondence and documents for mailing with the  
8 United States Postal Service, mailing via overnight delivery, transmission by facsimile machine,  
9 and delivery by hand.

10 On June 15, 2012, I served a copy of each of the documents listed below by placing said  
11 copies for processing as indicated herein:

12 **CONSOLIDATED AMENDED COMPLAINT**

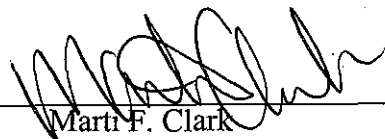
13 (✓) E-MAIL TRANSMISSION: The correspondence or documents were e-mailed from my  
14 place of business on this same date in the ordinary course of business prior to 6:00 p.m.  
15 Pacific Time using www.caseanywhere.com.

16 PERSONS OR PARTIES SERVED:

17 \*PLEASE SEE ATTACHED SERVICE LIST\*

18 (✓) (State) I certify (or declare) under penalty of perjury that the foregoing is true and correct  
19 and that this declaration was executed on June 15, 2012.

20 ( ) (Federal) I declare that I am employed in the office of a member of the bar of this court at  
21 whose direction the service was made.

22  
23  
24  
25  
26  
27  
28  
  
Marti F. Clark

**SERVICE LIST**

*Vasquez v. CSCA, et al./LASC Case No. BC 393129 RELATED TO: Wells Fargo v. Choueiri, et al./Case No. EC05567; Banks v. CSCA, et al./Case No. BC459917; Abrica v. CSCA, et al./Case No. BC463344; Alday v. CSCA, et al./Case No. BC467068; Aguilar v. CSCA, et al./Case No. BC470851; Ackerman v. CSCA, et al./Case No. BC474275; Arechiga v. CSCA, et al./Case No. BC477920; Anderson v. CSCA, et al./Case No. BC480905; Allen v. CSCA, et al./Case No. BC483891*

***Counsel for Defendants California School of Culinary Arts, Inc. and Career Education Corporation***

Stuart Richter, Esq.  
Melissa S. Glousman, Esq.  
Kristin L. Holland, Esq.  
KATTEN MUCHIN ROSENMAN LLP  
2029 Century Park East, Suite 2600  
Los Angeles, California 90067-3012

T: (310) 788-4400  
F: (310) 788-4471

Email: [stuart.richter@kattenlaw.com](mailto:stuart.richter@kattenlaw.com)  
[melissa.glousman@kattenlaw.com](mailto:melissa.glousman@kattenlaw.com)  
[kristin.holland@kattenlaw.com](mailto:kristin.holland@kattenlaw.com)  
[victoria.boyd@kattenlaw.com](mailto:victoria.boyd@kattenlaw.com)  
[eric.guerrero@kattenlaw.com](mailto:eric.guerrero@kattenlaw.com)  
[greg.korman@kattenlaw.com](mailto:greg.korman@kattenlaw.com)  
[dana.thompson@kattenlaw.com](mailto:dana.thompson@kattenlaw.com)

Jeff E. Scott, Esq.  
Gregory A. Nysten, Esq.  
Thomas Godwin, Esq.  
Adil M. Khan  
GREENBERG TRAURIG  
1840 Century Park East, 19<sup>th</sup> Fl  
Los Angeles, CA 90067-2101

T: (310) 586-7700  
F: (310) 586-7800

Email: [scottj@gtlaw.com](mailto:scottj@gtlaw.com)  
[nyleng@gtlaw.com](mailto:nyleng@gtlaw.com)  
[godwint@gtlaw.com](mailto:godwint@gtlaw.com)  
[khanad@gtlaw.com](mailto:khanad@gtlaw.com)  
[riveraal@gtlaw.com](mailto:riveraal@gtlaw.com)  
[stokiene@gtlaw.com](mailto:stokiene@gtlaw.com)

***Co-Counsel for Plaintiffs***

Ray E. Gallo, Esq.  
Patrick Chesney, Esq.  
GALLO & ASSOCIATES  
1101 Fifth Avenue, Suite 205  
San Rafael, CA 94901

T: (310) 338-1114  
F: (310) 338-1199

Email: [rgallo@gallo-law.com](mailto:rgallo@gallo-law.com)  
[pchesney@gallo-law.com](mailto:pchesney@gallo-law.com)  
[dvalerian@gallo-law.com](mailto:dvalerian@gallo-law.com)