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SUPERIOR COURT FOR THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

ANNA ALABURDA, JILL BALLARD,
DANIELA LOOMIS, AND NIKKI NGUYEN,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

THOMAS JEFFERSON SCHOOL OF LAW,
and DOES 1 through 100,

Defendants.

AND RELATED ACTIONS.

Case No. 37-2011-00091898-CU-FR-CTL
(AND RELATED ACTIONS)

[Assigned to the Honorable Joel M. Pressman,
Dept. 66]

SIXTH AMENDED COMPLAINT FOR:

- (1) UNFAIR BUSINESS PRACTICES
(BUS. & PROF. CODE § 17200 ET
SEQ.)
- (2) VIOLATION OF THE FALSE
ADVERTISING ACT (BUS. &
PROF. CODE § 17500 ET SEQ.)
- (3) INTENTIONAL FRAUD
- (4) NEGLIGENT
MISREPRESENTATION
- (5) VIOLATIONS OF THE
CONSUMER LEGAL REMEDIES
ACT (CIVIL CODE § 1750 ET
SEQ.)
- (6) NEGLIGENCE

DEMAND FOR JURY TRIAL

[Filed concurrently with Notice of Filing
Sixth Amended Complaint Pursuant to
Stipulation and Court Order]

OCT 20 '15 PM 12:17

FILED
Clerk of the Superior Court

OCT 20 2015

15 OCT 20 PM 2:01

NATURE OF THE ACTION

Plaintiffs Anna Alaburda, Jill Ballard, Daniela Loomis, and Nikki Nguyen ("Plaintiffs") allege as follows:

1. This dispute arises out of the fraudulent and deceptive business practices of Defendant Thomas Jefferson School of Law ("TJSL"). For more than 15 years, TJSL has churned out law school graduates, many of whom have little or no hope of working as attorneys at any point in their careers.

2. TJSL's average student indebtedness, more than \$180,000, is among the highest in the nation. And its bar passage is consistently lower than 50 percent, well below the average in California.

3. For most TJSL graduates, this average indebtedness figure will increase over time. In order for a TJSL graduate to pay off \$180,000 in law school debt in 15 years, it is estimated that he or she must earn a six figure salary. Most TJSL graduates do not, and will not, make anywhere near the amount of money they need to pay off these loans. Many of those who attend TJSL will be worse off.

4. Attending TJSL often represents a significant step backwards in life. More often than not, TJSL graduates face a life saddled with student debt in which they are dependent on friends and family just to scrape by while struggling to find a job – any job – to pay the bills:

(a) **Jill Ballard.** Before she attended TJSL, Plaintiff Jill Ballard ("Ballard") worked as a substitute teacher and earned enough money to live in her own apartment. Although she *graduated with honors* from TJSL and passed the California Bar Exam on her first try, she has been unable to find steady employment during the past five years. In fact, she was forced to live on food stamps for two years after graduating from TJSL. Ballard has earned less than \$10,000 per year since graduating from TJSL. She now lives with her mother.

(b) **Nikki Nguyen.** Before Plaintiff Nikki Nguyen ("Nguyen") attended TJSL, she lived independently and held a full-time job at Boeing in Seattle that paid approximately \$50,000 per year. She borrowed more than \$150,000 in order to attend TJSL. The

1 outstanding balance on her loans ballooned after graduation because she could not find
2 employment for the first 18 months after graduating. Now, despite having full-time
3 employment, Nguyen must live with her sister in order to keep up with her student loan
4 payments. Her job does not provide medical benefits. She is barely able to pay the interest
5 on her loans and has paid very little toward the principal. Even worse, Nguyen has been
6 forced to defer – and may have to forgo – starting a family because she cannot afford to have
7 children and climb out from under this debt.

8 (c) Daniela Loomis. Before Daniela Loomis (“Loomis”) attended TJSL, she was
9 a full-time legal assistant. She graduated from TJSL with more than \$200,000 in debt.
10 Because she could not find work for more than two years after graduation, the balance on her
11 law school loans skyrocketed to \$240,000. Today, almost 90% of what Loomis takes home
12 after taxes goes towards her student loan payments—she pays \$2,700 each month towards
13 student loans alone. The burden of student debt has made life more difficult for Loomis; she
14 feels unable to provide for her daughter and depends on her husband’s salary to pay basic
15 household expenses.

16 (d) Anna Alaburda. Before Anna Alaburda (“Alaburda”) attended TJSL, she
17 worked as an administrative assistant. She earned an annual salary of \$30,000 along with a
18 wide array of benefits, including health insurance and paid leave. She left her job to attend
19 TJSL in hopes of landing a full-time job as an attorney. After law school her dreams were
20 unfulfilled. She spent more than eight months searching for a job. Despite her best efforts,
21 the only jobs Alaburda was able to find were part-time or temporary positions that paid about
22 \$30 per hour without any benefits. Alaburda currently works as a part-time contract attorney
23 at a job that does not provide any health insurance or other benefits. Alaburda took out more
24 than \$100,000 in student loans to attend TJSL and because she has been unable to make full
25 payments on her loans, she now owes approximately \$150,000.

26 5. While TJSL graduates are forced to live with their parents, siblings, or depend on
27 spouses just to stay above water, TJSL has spent millions of dollars to fund a stylish new “luxurious
28 building.” TJSL brags on its website that its law school facility is a “stunning” new “eight-story

1 building” that includes an “iconic chevron roof” and “expansive view terraces.” The new TJSL
2 building, funded by student debt, is “ultra-modern” and features “top of the line mill and stone
3 work” and a “contemporary 50s style student lounge” with an “on-site restaurant.” The estimated
4 cost of the new luxury building is \$90,000,000.

5 6. In order to attract students and reap the benefits of the debt they incur, TJSL has
6 adopted a practice of misrepresenting its post-graduation employment statistics. TJSL’s misconduct
7 encompasses virtually every aspect of the placement data gathering and reporting process. Among
8 others, TJSL engages in the following:

- 9 • Concealing that TJSL’s employment figures include part-time and non-law related
10 jobs;
- 11 • Routinely misreporting unemployed students as “employed;”
- 12 • Collecting and using employment data from patently unreliable sources;
- 13 • Reporting employment data that has not been verified by the TJSL graduate
14 concerned;
- 15 • Shredding student surveys and other documents reflecting more accurate graduate
16 employment data;
- 17 • Concealing that TJSL’s median salary statistics reflect self-reported data from only a
18 handful of graduates;
- 19 • Reporting graduates who are employed in unskilled laborer positions as working in
20 “business/industry”;
- 21 • Concealing the number of graduates who are able to service their student loans;
- 22 • Refusing to report the number of students “employed at graduation,” even though that
23 information is readily available (because the figure is remarkably low); and
- 24 • Misreporting the number of students whose employment status is “unknown” in an
25 effort to mask the high number of unemployed students.

26 7. Perhaps the most egregious evidence of TJSL’s misreporting can be found in the
27 statements from its own graduates. In July 2013, in response to an email survey conducted by
28 Plaintiffs, dozens of TJSL graduates confirmed that TJSL had misreported them as “employed” nine

1 months after graduation. These graduates were, in fact, unemployed during the relevant period. The
2 only reason that a law school would report an unemployed student as "employed" is to deceive
3 prospective students.

4 8. Plaintiffs would not have enrolled in or attended TJSL if they had known the truth
5 about TJSL's graduate employment rates.

6 9. Additionally, during a deep economic recession affecting the legal industry on a
7 widespread basis, TJSL reported that the median salary of its graduates remained constant between
8 2006 and 2011 (even though the average salary of attorneys nationwide has seen a dramatic decline
9 in recent years).

10 10. TJSL mislead students by advertising post-graduation employment rates that typically
11 exceed 70 percent, and that topped 90 percent in 2010. TJSL, though, concealed the fact that these
12 figures include part time employment, as well as non law-related positions (i.e., a TJSL student will
13 be considered employed after graduation if he works as a part time waiter or convenience store
14 clerk). Prospective students were led to believe they will be hired as full time professionals in the
15 legal industry when they graduate, even though that is frequently not the case.

16 11. Furthermore, TJSL also misled students by concealing the fact that these post-
17 graduate employment figures were based on a small sample of graduating students rather than the
18 entire class of graduates. Specifically, TJSL concealed the fact that its statistics are based on surveys
19 and questionnaires that are sent to only a fraction of its graduates. Not all graduates received
20 surveys or questionnaires. And among those graduates who received questionnaires or surveys, only
21 a fraction of them completed and returned those forms to TJSL. Similarly, the median salary figures
22 reflect only those students who decide to self-report, thereby providing figures that were inflated and
23 inaccurate. Thus, the statistics provided by TJSL were designed to mislead prospective students into
24 believing they reflect the entire graduating class when, in fact, they represent only a fraction of the
25 relevant data set. The statistics are deliberately presented in a manner that is designed to deceive
26 prospective students.

27 12. There was no reason for TJSL to present a figure concerning the percentage of
28 graduates who are employed *in any position* (including part time and non law-related positions)

1 other than to mislead prospective students. Nobody attends law school to get a job as a convenience
2 store clerk.

3 13. TJSL knew that these statistics are widely reported by U.S. News & World Report's
4 "Best Graduate Schools" annual edition, which is reviewed by the bulk of prospective law school
5 students and is considered to be the authority on law school rankings. TJSL also reported these
6 misleading figures in one form or another on its website and in its marketing brochures.

7 TJSL's Business Model

8 14. After Plaintiffs filed this lawsuit, TJSL altered its reporting practices and its
9 employment statistics dropped. In the 2014 edition of U.S. News & World Report, TJSL reported
10 that 32.2 percent of its graduates were "employed" nine months after graduation; in the 2015 edition,
11 36.2 percent of TJSL graduates were reported as "employed" nine months after graduation.

12 15. In an attempt to compensate for its abysmal job placement statistics, TJSL has
13 lowered its admission standards and increased the number of applicants that it decides to admit. In
14 2007, TJSL admitted 24.1 percent of its applicants. Significantly, in 2012, TJSL admitted 73 percent
15 of its applicants. And in 2013, TJSL admitted more than 80 percent of its applicants. During this
16 time, the median GPA and LSAT score for TJSL's incoming classes has dropped significantly from
17 3.0 and 151 to a 2.86 and 146.

18 16. Meanwhile, TJSL's average student indebtedness continues to rise. That figure rose
19 from \$83,000 in 2005 to approximately \$180,000 last year. Thus, TJSL is admitting more students
20 and charging more than ever before.

21 17. TJSL, however, is entirely unconcerned with the most critical issue that its students
22 will face when they graduate—paying off their law school debt. Beverly Bracker—who has worked
23 in TJSL's Career Services Office for more than a decade and currently heads the entire
24 department—does not perform any analysis as to whether its students will be able to find a job upon
25 graduation. There is no analysis that has been done as to whether TJSL graduates will be able to
26 repay their loans. And TJSL performs no analysis as to whether its graduates will benefit from their
27 degree. In short, TJSL does not seem to care about what will happen to its students when they
28 graduate.

18. TJSL's Dean and Assistant Deans turn a blind eye toward the unlawful and fraudulent business practices of its Career Services Office. They put pressure on the Career Services Office to churn out impressive employment figures, but they do nothing to ensure that the Career Services Office accurately and correctly reports those figures. TJSL has created a culture wherein the reporting of inflated statistics has become the norm. TJSL's management and senior faculty have negligently supervised the employees responsible for collecting and reporting employment data.

19. At the end of the day, TJSL is more concerned with raking in millions of dollars in tuition and fees than educating and training its students. The disservice TJSL is doing to its students and society generally is readily apparent. Many TJSL graduates will never be offered work as attorneys or otherwise be in a position to profit from their law school education. And they will be forced to repay hundreds of thousands of dollars in school loans that are nearly impossible to discharge, even in bankruptcy.

20. This lawsuit seeks damages, restitution, and injunctive relief stemming from TJSL's fraudulent and unlawful conduct.

PARTIES AND JURISDICTION

Anna Alaburda

21. In 2002, Alaburda graduated with a bachelor's degree from New York University, one of the top undergraduate universities in the country. Prior to law school Alaburda worked as an administrative assistant making an annual salary of approximately \$30,000, plus benefits.

22. After reviewing the 2003 edition of U.S. News & World Report "Best Graduate Schools," among others, as well as TJSL's marketing brochures and website, she decided to enroll at TJSL. Alaburda relied on representations made by TJSL concerning its post-graduation employment rates, including a representation made in the 2003 edition of U.S. News & World Report "Best Graduate Schools," indicating that 80.1 percent of students were "employed nine months after graduation." Alaburda reasonably interpreted these figures to mean that the vast majority of TJSL graduates would find employment as full time attorneys and further believed that a law degree from TJSL would be marketable and would make her more attractive to employers, which is not the case.

1 23. Alaburda passed the California State Bar Examination (the "Bar Examination") on
2 her first attempt.

3 24. Alaburda graduated from TJSL in 2008 with more than \$100,000 in school loans,
4 some of which require repayment at interest rates exceeding eight percent.

5 25. Alaburda was, at all relevant times, unaware that the information reported by TJSL—
6 including the information on its website and the information reported in US News—was false and
7 misleading.

8 26. Alaburda would not have attended TJSL if she had known that TJSL's employment
9 figures were false, misleading, inflated, and inaccurate.

10 Jill Ballard

11 27. Ballard graduated from California State University, San Marcos in 1996. Before she
12 enrolled in law school, she was employed as a substitute teacher.

13 28. After reviewing 2003 U.S. News & World Report "Best Graduate Schools," as well
14 as TJSL's marketing brochures and website, she decided to enroll at TJSL. Ballard relied on
15 representations made by TJSL concerning its post-graduation employment rates, including a
16 representation made in the 2003 edition of U.S. News & World Report "Best Graduate Schools,"
17 indicating that 80.1 percent of students were "employed nine months after graduation." Ballard
18 reasonably interpreted these figures to mean that the vast majority of TJSL graduates would find
19 employment as full time attorneys. She further believed that her law degree from TJSL would be
20 marketable and would make her more attractive to employers, which is not the case.

21 29. Ballard graduated with honors from TJSL in December 2008. After graduating,
22 Ballard passed the Bar Examination on her first attempt. She applied for more than 200 jobs after
23 graduation and searched diligently for employment.

24 30. During the first two years after she graduated from TJSL Ballard was eligible for and
25 received government assistance in the form of food stamps.

26 31. In 2009, the year after she graduated, Ballard earned only \$1,384. In 2010, Ballard
27 earned approximately \$6,000 and continued to receive food stamps. In 2013, Ballard earned less
28 than \$3,000.

1 32. TJSL knew Ballard was unemployed. In June 2009, she met in-person with an
2 employee in TJSL's Career Services Office. Ballard informed TJSL that she was unemployed.
3 Ballard further stated that she recently sought a deferral of her student loans due to economic
4 hardship.

5 33. TJSL reported Ballard as being employed full-time, even though she was
6 unemployed.

7 34. Ballard graduated from TJSL with approximately \$76,659 in student debt. That
8 figure has increased to more than \$100,000 in principal and interest because Ballard has been unable
9 to pay down her loans.

10 35. Ballard was, at all relevant times, unaware that the information reported by TJSL—
11 including the information on its website and the information reported in US News—was false and
12 misleading.

13 36. Ballard would not have attended TJSL if she had known that TJSL's employment
14 figures were false, misleading, inflated, and inaccurate.

15 Daniela Loomis

16 37. Loomis graduated from the University of California at Berkeley in 2005. Loomis
17 enrolled at TJSL in 2007. She graduated from TJSL in December 2009. Prior to law school,
18 Daniela worked as a legal assistant.

19 38. After reviewing the 2006 edition of U.S. News & World Report "Best Graduate
20 Schools," among others, as well as TJSL's marketing brochures and website, she decided to enroll at
21 TJSL.

22 39. Loomis relied on representations made by TJSL concerning its post-graduation
23 employment rates, including a representation made in the 2006 edition of U.S. News & World
24 Report "Best Graduate Schools," indicating that 77 percent of students were "employed nine months
25 after graduation." Loomis reasonably interpreted these figures to mean that the vast majority of
26 TJSL graduates would find employment as full time attorneys. She further believed that her law
27 degree from TJSL would be marketable and would make her more attractive to employers, which is
28 not the case.

1 40. Loomis was unemployed for the first two years after she graduated from TJSL.
2 TJSL, though, reported Loomis as employed.

3 41. Specifically, TJSL reported that Loomis was employed at the San Diego City
4 Attorney's Office. Loomis never worked at the San Diego City Attorney's Office.

5 42. Loomis graduated from TJSL with \$200,000 in debt. That figure has since increased
6 to approximately \$240,000 in principal and interest because she has been unable to pay down her
7 loans.

8 43. Loomis was, at all relevant times, unaware that the information reported by TJSL—
9 including the information on its website and the information reported in US News—was false and
10 misleading.

11 44. Loomis would not have attended TJSL if she had known that TJSL's employment
12 figures were false, misleading, inflated, and inaccurate.

13 Nikki Nguyen

14 45. Nguyen graduated from the University of Southern California ("USC") in 2004 with a
15 degree in economics. She then went to work for Boeing Commercial Airplanes ("Boeing"). The
16 year prior to attending TJSL, Nguyen's annual salary at Boeing was approximately \$50,000.

17 46. After reviewing the 2006 edition of U.S. News & World Report "Best Graduate
18 Schools," among others, as well as TJSL's marketing brochures and website, she decided to enroll at
19 TJSL. Nguyen relied on representations made by TJSL concerning its post-graduation employment
20 rates, including a representation made in the 2006 edition of U.S. News & World Report "Best
21 Graduate Schools," indicating that 77 percent of students were "employed nine months after
22 graduation." Nguyen reasonably interpreted these figures to mean that the vast majority of TJSL
23 graduates would find employment as full time attorneys. She further believed that her law degree
24 from TJSL would be marketable and would make her more attractive to employers, which is not the
25 case.

26 47. Nguyen enrolled at TJSL in 2007. She graduated in December 2009.

27 48. In 2010, the year after she graduated, Nguyen earned less than \$3,000. Her primary
28 source of income was odd jobs, including housesitting.

1 49. Since 2011, Nguyen has been able to find sporadic work as a contract attorney.
2 However, Nguyen has been unable to earn more money as an attorney than she made prior to
3 attending law school.

4 50. TJSL reported Nguyen as being employed as a full-time attorney nine months after
5 she graduated. Nguyen was not employed as a full-time attorney nine months after graduation.

6 51. Nguyen graduated from TJSL with approximately \$183,000 in debt. That figure has
7 since increased to approximately \$194,155 in principal and interest.

8 52. Nguyen would not have attended TJSL if she had known that TJSL's employment
9 figures were false, misleading, inflated, and inaccurate.

10 **Jurisdiction and Venue**

11 53. Plaintiffs are individuals residing in California.

12 54. TJSL is a privately-held educational institution with its principal place of business in
13 San Diego, California.

14 55. The jurisdiction and venue of this action within the Superior Court of the State of
15 California for the County of San Diego is proper because the causes of action alleged herein, and
16 many of the activities and conduct giving rise to the ensuing causes of action, substantially occurred
17 in San Diego County, California.

18 56. Plaintiffs are ignorant of the true names, capacities, relationships and extent of
19 participation in the conduct herein alleged, of the Defendants sued herein as DOES 1 through 100,
20 inclusive, but on information and belief allege that said Defendants are legally responsible to
21 reimburse Plaintiffs for expenditures or losses they incurred and therefore sue the Defendants by
22 such fictitious names. Plaintiffs will amend this complaint to allege the true names and capacities of
23 the DOE Defendants when ascertained.

24 **FACTUAL BACKGROUND**

25 **Thomas Jefferson School of Law**

26 57. TJSL is a private institution that was established in 1995. It was granted ABA
27 accreditation six years later, in August 2001. TJSL enrolls more than 680 full time students and
28 approximately 270 part time students annually.

1 58. Tuition at TJSL for the 2014-2015 academic year is \$44,900, and room and board is
2 \$29,070, bringing the total cost for the academic year to \$74,600 (just shy of \$225,000 for three
3 years).

4 59. Despite one of the worst recessions in the legal industry in recent history, TJSL's
5 purported median salary figures have remained nearly constant over the last five years (it is unclear
6 at this time whether these figures are falsified or whether they are simply misleading because so few
7 TJSL graduates actually work in the legal industry). Indeed, TJSL currently accepts a higher
8 percentage of applicants in order to fill its seats than it did just a few years ago—its acceptance rate
9 in 2007 was 24.1 percent, in 2013 TJSL's acceptance rate jumped to 73 percent and last year TJSL
10 accepted 80.7 percent of its applicants. TJSL is taking on more students every year in order to line
11 its own pockets, without regard to whether those students will benefit in any way from their law
12 school education or otherwise have an opportunity to work as attorneys.

13 60. On January 8, 2011, the New York Times published an article entitled "Is Law
14 School A Losing Game?" by David Segal. The article reported that TJSL leads the nation's law
15 schools with 95 percent of students graduating with debt.¹

16 61. TJSL attracts students by making grandiose representations about the campus and
17 local community like: "San Diego is not only paradise, but offers unmatched legal and economic
18 opportunities in addition to its cultural and recreational advantages"; and "we offer unique,
19 innovative academic success programs and our campus is among the most technologically advanced
20 in the world." These claims are a deliberate effort to distract attention from TJSL's bleak academic
21 and employment statistics.

22 Thomas Jefferson School of Law Grows While The Market for Attorneys Shrinks

23 62. Notwithstanding the economic recession that has crippled the job market for lawyers
24 in the past years, TJSL embarked on a campaign to expand its student body. In the middle of the
25 recession, TJSL increased its enrollment by 17 percent, with more than 680 students enrolled in
26 2011 (up from 580 students in 2008).

27
28 ¹ David Segal, *Is Law School a Losing Game*, N.Y. TIMES, Jan. 8, 2011,
<http://www.nytimes.com/2011/01/09/business/09law.html>.

63. In fact, TJSL needed tuition payments from an increased number of students in order to pay off its own debt—debt the school incurred by, among other things, building a multi-million dollar, “luxurious” new building in downtown San Diego, which opened in January 2011. TJSL advertises its 305,000 square foot campus as including an eight story state-of-the art building, 12 classrooms, two recording studios, a student lounge and a “sophisticatedly designed” moot court room.

U.S. News & World Report’s “Best Graduate Schools”

64. U.S. News & World Report’s “Best Graduate Schools” edition is the nation’s leading publication concerning law school rankings. U.S. News & World Report advertises its annual publication as containing “Exclusive Rankings” and it purports to be a “#1 Bestseller.” It is marketed to students interested in “finding the right school” and determining “where the jobs are.”

65. It has been reported that “unlike other graduate programs, like those for business or medicine, U.S. News’ list offers the only comprehensive look at law schools.”² Law Schools ignore the U.S. News & World Report ranking at their own peril: “Any school that dares to ignore the [U.S. News & World Report] rankings risks a death spiral of rapidly departing employers, students and faculty, leading to lower ranking and even more problems.”³

66. On information and belief, U.S. News & World Report obtains its information by sending surveys directly to the law schools, as well as from figures provided by the ABA and the National Association for Law Placement (“NALP”). On information and belief, TJSL provides false and inaccurate information directly to U.S. News & World Report with the understanding that the false and inaccurate information will be disseminated to the public.

Thomas Jefferson School of Law’s Employment Statistics

67. U.S. News & World Report includes statistics in each of their “Best Graduate School” publications regarding the number of students “employed nine months after graduation.”

² Sandra Randazzo, *UC Hastings Reveals Rankings Tactics*, LA DAILY JOURNAL, Jan. 5, 2011.

³ Daniel J. H. Greenwood, *Market Irrationality in the Law School ‘Arms Race’*, HUFFINGTON POST (May 6, 2011), http://www.huffingtonpost.com/daniel-j-h-greenwood/market-irrationality-in-t_b_856400.html.

1 This figure—along with other statistics that purportedly reflect “placement success”—accounts for
2 20 percent of a law school’s ranking in U.S. News & World Report.

3 68. The figures reported for TJSL in U.S. News & World Report concerning TJSL
4 students “employed nine months after graduation” are false and misleading. In 2007, TJSL reported
5 that 82.9 percent of its graduates were “employed nine months after graduation”; and in the 2011
6 issue, in the midst of a deep recession in the legal industry, TJSL reported that 92.1 percent of its
7 2009 graduates were employed “nine month after graduation.” TJSL has an incentive to misreport
8 its post-graduation employment statistics because inflated figures will result in a higher overall
9 ranking in U.S. News & World Report.

10 69. TJSL provides these statistics to U.S. News & World Report each year knowing that
11 they will be published. Specifically, these figures suggest that 82.9 percent of 2005 TJSL graduates
12 were employed in full time, law-related positions; and that 92.1 percent of 2009 graduates worked in
13 full time, law-related positions. In fact, the foregoing figures include part time employment, as well
14 as non-law-related employment. In other words, if graduates accept part time employment working
15 as a waiter or a clerk at a convenience store, they are considered to be “employed nine months after
16 graduation.” These figures are particularly misleading in light of the fact that 25 percent of
17 graduates from law schools nationwide in 2009 said their jobs were temporary.⁴

18 70. Each year, TJSL provides such false and misleading statistical information to U.S.
19 News & World Report knowing that the information is false and misleading. TJSL benefits from
20 these misrepresentations, as students agree to pay exorbitant fees after they are led to believe they
21 will receive lucrative offers to work at law firms when they graduate (when that is clearly not the
22 case for most TJSL students).

23 Thomas Jefferson School of Law’s Errors and Improper Practices

24 71. In addition to reporting as employed both unemployed students and students
25 employed in unskilled labor positions, TJSL’s methodology for collecting and reporting employment
26 data is biased. TJSL reports a graduate as employed even when it knows he or she is employed in a
27

28 ⁴ Segal, *supra* note 1.

1 short-term position and it has not confirmed his or her employment status in weeks or months; at the
2 same time TJSL continues to check on the employment status of graduates known to be unemployed
3 until the very day before the reporting deadlines for NALP and US News. This practice was and is
4 designed to ensure, and does ensure, that TJSL's employment figures are inflated and misleading.

5 72. Just before graduation, TJSL interviews its graduating students. This "exit interview"
6 is mandatory for all graduating students. During the exit interview, TJSL obtains employment data
7 for each graduating student. Thus, TJSL knows the employment status of every student at
8 graduation. Nevertheless, TJSL refused to report a figure for "employed at graduation" to US News
9 for every year from 2002-2012, even though that information was readily available. In the 2013
10 edition, TJSL reported that "graduates whose employment status is unknown" was 71 percent (and
11 that TJSL only had employment data for 29 percent of its graduates). TJSL, though, was in
12 possession of graduation employment data for 100 percent of its graduating class. Its decision to
13 report employment data for only 29 percent of its graduates was false and misleading.

14 73. TJSL does not have a written policy regarding its data collection process.

15 74. TJSL does not have a written policy regarding the sources of employment
16 information that it considers to be acceptable. TJSL accepts as true employment information from
17 websites and third-parties without verifying that information with its graduates.

18 75. TJSL frequently reported graduates as employed even though they hold unpaid
19 volunteer positions—a clear violation of NALP reporting guidelines.

20 76. TJSL had a policy of shredding or otherwise destroying its employment
21 questionnaires, graduation cards, and other documents reflecting its graduates' employment status.
22 TJSL destroyed all source documents before the filing of this lawsuit.

23 77. TJSL claims that it accurately records all source data in electronic spreadsheets that
24 TJSL's Career Services Office creates. But TJSL has produced its spreadsheets in this action and
25 they fail to support the figures that TJSL reported to US News and NALP. Among the most glaring
26 examples of TJSL's improper practices are:

- 27 (a) For the Class of 2006, there was a direct correlation between a graduate's
28 employment status and his or her last name. Graduates whose last names started with

1 A through N were all employed; graduates whose names started with S and T were all
2 studying for the Bar Examination; and graduates whose last names started with W
3 were all unemployed. (TJSL recently admitted that its purported data for the Class of
4 2006 was inaccurate).

5 (b) For the Class of 2010, approximately 15 percent of TJSL graduates were reported as
6 employed even though TJSL had no employment data for those individuals.

7 (c) TJSL's data contains routine inconsistencies. For instance, TJSL reports salaries for
8 graduates who are listed as unemployed. And, TJSL reports graduates as being
9 simultaneously employed and unemployed.

10 78. TJSL reported that its graduates are employed in positions requiring a law degree,
11 even though they are not. For instance, TJSL has classified a pool cleaner, waiters and waitresses,
12 and retail store clerks as working in jobs requiring a law degree.

13 79. TJSL had a policy of reporting graduates who are not employed in jobs requiring a
14 law degree as working in "business/industry," including those working in unskilled labor positions.
15 TJSL admits that its policy is to categorize all unskilled labor positions as "business/industry,"
16 including TJSL graduates who are employed as a stripper, cocktail waitresses, and restaurant servers.

17 80. TJSL reported median salary figures based on only a handful of graduates who self-
18 report. For instance, in 2009 and 2010, TJSL reported that the median salary for its graduates was
19 approximately \$60,000. These figures were based on responses from only 14 percent and 12 percent
20 of graduates, respectively. And the responses were from graduates who decided to self-report.
21 Graduates with low paying jobs are far less likely to self-report or return the questionnaire than those
22 earning higher wages.

23 FIRST CAUSE OF ACTION

24 (All Plaintiffs Against TJSL for Violation of Business & Professions Code § 17200 et seq.)

25 81. Plaintiffs incorporate by reference each and every previous and subsequent paragraph
26 as though set forth fully herein.

27 82. The Unfair Competition Law ("UCL") prohibits "unfair competition," which is
28 defined by Business and Professions Code section 17200 as including "any unlawful, unfair or

1 fraudulent business act or practice. . . .” The UCL also provides for injunctive relief and restitution
2 for violations.

3 83. The material misrepresentations and acts of concealment by TJSL are unlawful,
4 unfair and fraudulent business practices prohibited by the UCL.

5 84. The harm to Plaintiffs outweighs the utility of TJSL’s practices.

6 85. TJSL holds itself out as an ABA accredited institution with admissions policies and
7 practices that comply with the ABA Standards for Approved Law Schools. In fact, TJSL violated
8 ABA Standard 509 during the relevant period. Pursuant to ABA Rule 509, TJSL was required to
9 provide prospective students with accurate employment data. TJSL failed to do so at all times
10 during the relevant period. TJSL knowingly and willfully violated ABA Rule 509. Plaintiffs would
11 not have attended TJSL if they knew about these violations.

12 86. Plaintiffs decided to enroll at TJSL, in part, because it is in ABA accredited law
13 school. TJSL concealed the fact that the law school was in violation of ABA Rule 509. Plaintiffs
14 reasonably believed that TJSL was in compliance with this ABA Rule at all relevant times.

15 87. Plaintiffs would not have enrolled at TJSL if they knew about the ABA violations that
16 were ongoing at the time Plaintiffs decided to attend. TJSL’s deceptive conduct has misled the
17 public in the past and will continue to mislead the public in the future. TJSL’s practices constitute a
18 fraudulent business practice within the meaning of the UCL.

19 88. As a direct and proximate result of the acts and practices alleged above, Plaintiffs
20 have been injured.

21 89. TJSL’s unlawful, fraudulent and unfair business practices, as described above,
22 present a continuing threat to the general public, in that TJSL is continuing, and will continue, unless
23 enjoined, to commit violations of Business and Professions Code section 17200 et seq.

24 90. Under this cause of action and pursuant to Business and Professions Code section
25 17200 et seq., Plaintiffs seek restitution and are entitled to restitution in an amount according to
26 proof, as well as preliminary and permanent injunctive relief against TJSL’s acts and practices.
27 Plaintiffs further seek reimbursement of their attorney’s fees pursuant to Civil Procedure Code
28 section 1021.5.

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SECOND CAUSE OF ACTION

(All Plaintiffs Against TJSL for Violation of Business & Professions Code § 17500 et seq.)

91. Plaintiffs incorporate by reference each and every previous and subsequent paragraph as though set forth fully herein.

92. The False Advertising Act makes it unlawful to "make or disseminate or cause to be made or disseminated before the public [a statement] which is untrue or misleading, and which is known, or which by the exercise of reasonable care should be known, to be untrue or misleading" with the intent to "induce the public to enter into any obligation relating thereto." Such statements include statements made through "any advertising device," including "over the Internet."

93. Under Business & Professions Code section 17500 et seq., Plaintiffs are entitled to enjoin TJSL's wrongful practices and to obtain restitution for the monies paid to TJSL by reason of TJSL's unlawful, unfair, and/or deceptive acts and practices.

94. TJSL violated Business & Professions Code section 17500 et seq. by making or disseminating, or causing to be made or disseminated, false and misleading statements in U.S. News & World Report's "Best Graduate Schools" publication, on its website, and in its marketing brochures.

95. These misleading statements concerned post-graduation employment statistics, among others. These false and misleading statements were made with the intent to induce the general public, including Plaintiffs, to enroll at TJSL.

96. Plaintiffs did in fact rely on these false and misleading statements when deciding to enroll in TJSL. These false and misleading statements would and did mislead members of the public.

97. As a direct and proximate result of the acts and practices alleged above Plaintiffs have been injured. This Court is empowered to, and should, order TJSL to pay Plaintiffs compensatory damages.

98. TJSL's unlawful, false and misleading advertising, as described above, presents a continuing threat the general public, in that TJSL is continuing, and will continue, unless enjoined, to commit violations of Business & Professions Code section 17500 et seq. This Court is

1 empowered to, and should, grant preliminary and permanent injunctive relief against such acts and
2 practices. Plaintiffs further seek reimbursement of their attorney's fees pursuant to Civil Procedure
3 Code section 1021.5.

4 THIRD CAUSE OF ACTION

5 (All Plaintiffs Against TJSL for Fraud)

6 99. Plaintiffs incorporate by reference each and every previous and subsequent paragraph
7 as though set forth fully herein.

8 100. As part of its fraudulent marketing program, TJSL engaged in a pattern and practice
9 of knowingly, intentionally, and/or recklessly making numerous false representations of material
10 fact, and material omissions, with the intent to deceive and/or induce reliance by Plaintiffs.

11 101. Plaintiffs did in fact justifiably rely on these misrepresentations and omissions,
12 resulting in substantial damage to Plaintiffs. Specifically, Plaintiffs reviewed and relied on the post-
13 graduation employment statistics reflected in the U.S. News & World Report "Best Graduate
14 Schools" edition, among others, before deciding to enroll at TJSL. Plaintiffs relied on subsequent
15 editions of U.S. News & World Report "Best Graduate Schools" in deciding to continue with their
16 studies at TJSL.

17 102. TJSL induced Plaintiffs to enroll at TJSL by making one or more, or in many cases
18 all, of the following false and fraudulent misrepresentations of fact to Plaintiffs:

- 19 (a) that between 72 and 92 percent of TJSL graduates would find work as full
20 time attorneys; and
21 (b) that between 72 and 92 percent of TJSL graduates would find work in the
22 legal industry.

23 103. TJSL also induced Plaintiffs to enroll by making the following uniform false and
24 fraudulent misrepresentations regarding its employment statistics to U.S. World News & Report,
25 knowing that U.S. World News & Report would repeat the false and misleading information and that
26 Plaintiffs would rely on and act on it:

- 27 (a) in the 2003 edition of U.S. News & World Report, 80.1 percent of TJSL
28 students were employed within nine months of graduation;

- (b) in the 2004 edition of U.S. News & World Report, 80.1 percent of TJSL students were employed within nine months of graduation;
- (c) in the 2005 edition of U.S. News & World Report, 56.4 percent of TJSL students were employed within nine months of graduation;
- (d) in the 2006 edition of U.S. News & World Report, 77.0 percent of TJSL students were employed within nine months of graduation;
- (e) in the 2007 edition of U.S. News & World Report, 82.9 percent of TJSL students were employed within nine months of graduation;
- (f) in the 2008 edition of U.S. News & World Report, 64.7 percent of TJSL students were employed within nine months of graduation;
- (g) in the 2009 edition of U.S. News & World Report, 80.0 percent of TJSL students were employed within nine months of graduation;
- (h) in the 2010 edition of U.S. News & World Report, 86.7 percent of TJSL students were employed within nine months of graduation;
- (i) in the 2011 edition of U.S. News & World Report, 92.1 percent of TJSL students were employed within nine months of graduation; and
- (j) in the 2012 edition of U.S. News & World Report, 72.7 percent of TJSL students were employed within nine months of graduation.

104. The foregoing statistics are false and misleading. TJSL conceals the fact that these post-graduate employment figures are based on a small sample of graduating students rather than the entire class of graduates. Specifically, TJSL concealed the fact that its statistics are based on surveys and questionnaires that are sent to only a fraction of its graduates—not all graduates receive surveys or questionnaires. And among those graduates who do receive questionnaires or surveys, only a fraction of them complete and return those forms to TJSL. Indeed, this method of reporting is designed to overstate the percentage of students who are employed nine-months after graduation—students who actually receive surveys or questionnaires and who ultimately decide to complete and return them are more likely to be employed in the first instance.

1 105. Also, for those same years, TJSL knowingly, intentionally, recklessly, and willfully
2 withheld its "employed at graduation" figure from U.S. News & World Report. During those years,
3 U.S. News & World Report indicated that the "employed at graduation" figure was "n/a" or not
4 available. That statement was false. TJSL had in its possession "employed at graduation" figures
5 for each of those years but decided not to publish or disclose them because the figures were
6 remarkably low and, therefore, reflected the truth about the value and marketability of a TJSL
7 degree.

8 106. After the filing of this lawsuit, the employment figures TJSL reported to U.S. News
9 & World Report dropped dramatically due to U.S. News & World Report more stringent reporting
10 rules. In the 2014 edition of U.S. News & World Report, TJSL reported that only 32.2% of
11 graduates were employed nine months after graduation. In the 2015 edition of U.S. News & World
12 Report, TJSL reported that 36.2% of graduates were employed nine months after graduation.

13 107. In July 2013, Plaintiffs, using contact information provided by TJSL, emailed more
14 than 800 TJSL graduates with a brief questionnaire. In the questionnaire, Plaintiffs provided each
15 graduate with details as to how TJSL had reported them to NALP (and ultimately U.S. News);
16 Plaintiffs further asked each graduate to confirm that the information was accurate. Based on the
17 responses obtained from TJSL graduates, Plaintiffs are informed and believe that TJSL inflated the
18 employment figures for its Class of 2009 by approximately 24 percent, and its employment figures
19 for the Class of 2010 by approximately 23 percent.

20 108. TJSL reported an "employed at graduation" figure for the first time in the 2013
21 edition of U.S. World News and Report. In that edition, TJSL reported an "employed at graduation"
22 figure of 28.1 percent. It also stated that that employment status of 71 percent of its graduates was
23 unknown. The 71 percent figure was false, misleading, and inaccurate. TJSL reported "employed at
24 graduation" figure took a significant nosedive in the last two years despite an improving economy.
25 In the 2014 edition of U.S. Word News and Report, the figure dropped to 9.7 percent and to 8.1
26 percent in 2015.

27 109. Similarly, the median salary figures reflect only those students who decide to self-
28 report, thereby providing figures that are inflated and inaccurate. For instance, in the most recent

1 edition of U.S. News & World Report, TJSL reported a median salary figure of \$50,000-\$80,000.
2 The figure reported in U.S. News & World Report is based on information supplied by TJSL. TJSL,
3 in turn, receives its salary data only from students who decide to self-report that information. In
4 providing this salary information to U.S. News & World Report, TJSL concealed the number of
5 students who self-reported salary information. And TJSL concealed the fact that many of students
6 do not even receive a salary survey or questionnaire in the first instance. Thus, the median salary
7 figure is grossly misleading and inaccurate—it is designed to present an inflated median salary
8 figure.

9 110. The statistics provided by TJSL are designed to mislead prospective students into
10 believing they reflect the entire graduating class when, in fact, they represent only a fraction of the
11 relevant data set. TJSL knows that these figures are false and misleading. Nevertheless, TJSL has
12 decided to continue using this methodology because it presents a more favorable picture of the law
13 school's employment figures.

14 111. Plaintiffs reasonably relied on U.S. News & World Report "Best Graduate Schools,"
15 among others, in deciding whether to enroll at TJSL.

16 112. In addition, Plaintiffs have reasonably relied on consumer information located on
17 TJSL's school website, including, but not limited to the following representations made by TJSL:

- 18 (a) 86.4 percent of law students from TJSL's Class of 2008 are employed;
- 19 (b) 84.7 percent of law students from TJSL's Class of 2009 are employed; and
- 20 (c) Although TJSL's website currently contains information for 2008 and 2009
21 exclusively, the website contained similarly false and inaccurate information
22 in previous years as well.

23 113. Plaintiffs continued to rely on subsequent editions of U.S. News & World Report
24 "Best Graduate Schools" in deciding to continue with their studies at TJSL, including those specified
25 in Paragraph 97, above.

26 114. The foregoing statistics were false, misleading, and intentionally designed to deceive
27 all who read them.
28

1 115. The representations set forth above were part of a common scheme or plan and a
2 pattern or practice conceived and executed by TJSL over the course of the entire statutory period.

3 116. TJSL knew that these misrepresentations were false when made, and made them with
4 the intent to induce Plaintiffs to rely upon them.

5 117. In addition, TJSL occupied a fiduciary position as educators, and owed a heightened
6 duty to Plaintiffs to act in good faith and with full candor and honesty. Plaintiffs are also informed
7 and believe that many of the staff and faculty members of TJSL are attorneys and/or members of the
8 California State Bar and therefore have ethical responsibilities to the students at TJSL. TJSL
9 breached these fiduciary duties and duties of good faith, candor, and disclosure by omitting to
10 disclose material facts alleged above to Plaintiffs. .

11 118. Plaintiffs were, at all relevant times, ignorant of the true facts. Plaintiffs only
12 discovered that TJSL had a policy and practice of misrepresenting its post-graduation employment
13 statistics on or after January 2011 when the New York Times published an article disclosing TJSL's
14 fraudulent practices.

15 119. Accordingly, Plaintiffs have been damaged. Plaintiffs would not have enrolled at
16 TJSL—and consequently would not have incurred tens or hundreds of thousands of dollars in law
17 school debt—but for TJSL's false and misleading statements. TJSL's herein-alleged wrongful acts
18 and omissions, and each of them, were knowingly, willfully, intentionally, maliciously, oppressively,
19 and fraudulently undertaken with the express purpose and intention of defrauding Plaintiffs, and
20 each of them, all to the substantial financial benefit of TJSL. As a result, Plaintiffs are entitled to
21 punitive damages.

22 **FOURTH CAUSE OF ACTION**

23 **(All Plaintiffs Against TJSL for Negligent Misrepresentation)**

24 120. Plaintiffs incorporate each and every previous and subsequent paragraph as though
25 set forth fully herein.

26 121. TJSL made uniform and identical material written representations regarding students'
27 post-graduation employment rates. TJSL also failed to disclose the material facts alleged herein.
28

1 When TJSL made these representations and omissions, TJSL had no reasonable grounds for
2 believing them to be true.

3 122. The duty to disclose material information arises when parties make partial
4 disclosures that are likely to mislead because they omit other material facts. Because TJSL disclosed
5 its post-graduate employment figures, it had a duty to disclose all material information surrounding
6 those figures so that prospective candidates could have an accurate picture of their employment
7 prospects.

8 123. TJSL presented half-truths to the public, including prospective students. The material
9 information regarding these statistics that TJSL failed to disclose was not accessible to the students.

10 124. Plaintiffs relied on these negligent representations before enrolling at TJSL and relied
11 on these misrepresentations in deciding to so enroll.

12 125. At the time TJSL made the misrepresentations discussed above, Plaintiffs were
13 ignorant of the true facts. Had they known the true facts, Plaintiffs would not have enrolled at TJSL.

14 126. As a proximate result of TJSL's negligent conduct, Plaintiffs have been damaged in
15 an amount in excess of this Court's jurisdiction, the exact amount to be proven at trial.

16 FIFTH CAUSE OF ACTION

17 (All Plaintiffs Against TJSL for Violation of the Consumer Legal Remedies Act)

18 127. Plaintiffs incorporate by reference each and every previous and subsequent paragraph
19 as though set forth fully herein.

20 128. Under California Civil Code section 1750 et seq., Plaintiffs are entitled to enjoin
21 TJSL's wrongful practices by reason of TJSL's unlawful, unfair, and/or deceptive acts and practices.

22 129. The Consumer Legal Remedies Act prohibits unfair methods of competition and
23 unfair or deceptive acts or practices undertaken by any person in a transaction intended to result or
24 which results in the sale of goods and services.

25 130. TJSL violated the Consumer Legal Remedies Act by misrepresenting to Plaintiffs
26 TJSL's post-graduation employment rates.

27 131. TJSL's unlawful and unfair business acts and practices, and unfair, deceptive, untrue,
28 and misleading advertising, as described above, present a continuing threat to Plaintiffs and

1 members of the general public, in that TJSL continues to mislead prospective students into enrolling
2 in law school in violation of the Consumer Legal Remedies Act. This Court is empowered to, and
3 should, grant preliminary and permanent injunctive relief against such acts and practices.

4 132. By reason of the above-described violations of the Consumer Legal Remedies Act,
5 Plaintiffs have suffered damages in an amount to be proven at trial.

6 133. On June 14, 2011, Plaintiffs provided written notice, as required by Civil Code
7 section 1782, to TJSL regarding the above-described violations of the Consumer Legal Remedies
8 Act.

9 134. TJSL failed to cure the above-referenced violations after receiving written notice.

10 **SIXTH CAUSE OF ACTION**

11 (All Plaintiffs Against TJSL for Negligence)

12 135. Plaintiffs incorporate by reference each and every previous and subsequent paragraph
13 as though set forth fully herein.

14 136. TJSL owed Plaintiffs a duty of care to report its employment figures accurately.

15 137. TJSL breached that duty by reporting false and inaccurate employment information.
16 TJSL failed to collect and report its employment information while exercising a reasonable standard
17 of care.

18 138. The substantial injuries suffered by Plaintiffs were foreseeable at the time TJSL
19 breached its duty of care.

20 139. As a direct and proximate result of TJSL's negligence, Plaintiffs have suffered
21 damages in an amount to be proven at trial.

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Plaintiffs pray for judgment against TJSL and the DOES 1-100 as follows:

24 **As to the First and Second Causes of Action**

- 25 1. For restitution in an amount to be proven at trial, but believed to be in excess of
26 \$500,000;
27 2. For disgorgement of all profits obtained by TJSL as a result of its unfair and
28 fraudulent business practices;

3. For injunctive relief enjoining, preliminarily and permanently, TJSL from continuing the unlawful conduct alleged herein;
4. For attorney's fees and costs of suit herein incurred pursuant Code of Civil Procedure section 1021.5; and
5. For such other and further relief as the Court may deem just and proper.

As to the Third Cause of Action

6. For compensatory damages in an amount to be proven at trial, but believed to be in excess of \$500,000;
7. Consequential damages and losses caused by the fraud, including but not limited to loss of opportunity the Plaintiffs suffered;
8. For punitive damages;
9. For prejudgment interest pursuant to section 3287 of the Civil Code; and
10. For such other and further relief as the Court may deem just and proper.

As to the Fourth and Sixth Causes of Action

11. For compensatory damages in an amount to be proven at trial, but believed to be in excess of \$500,000;
12. Consequential damages and losses caused by Defendant's actions, including but not limited to loss of opportunity the Plaintiffs suffered;
13. For prejudgment interest pursuant to section 3287 of the Civil Code; and
14. For such other and further relief as the Court may deem just proper.

As to the Fifth Cause of Action

15. For injunctive relief enjoining, preliminarily and permanently, TJSL from continuing the unlawful conduct alleged herein;
16. For attorney's fees and costs of suit herein incurred pursuant Code of Civil Procedure sections 1780(d) and 1021.5; and
17. For such other and further relief as the Court may deem just proper.

1 DATED: October 20, 2015

MILLER BARONDESS, LLP

2
3
4 By: 

5 Brian A. Procel
6 Attorneys for Plaintiffs
7 Anna Alaburda, Jill Ballard,
8 Nikki Ngyuen, and Daniela Loomis

9 DEMAND FOR JURY TRIAL

10 By its undersigned attorney, Plaintiffs hereby demand trial by jury.

11 DATED: October 20, 2015

MILLER BARONDESS, LLP

12
13
14 By: 

15 Brian A. Procel
16 Attorneys for Plaintiffs
17 Anna Alaburda, Jill Ballard,
18 Nikki Ngyuen, and Daniela Loomis
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