UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

STRATFORD CAREER INSTITUTE, INC., a corporation,

Defendant.

Case No.

COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF

Plaintiff, the Federal Trade Commission ("FTC"), for its Complaint alleges:

1. The FTC brings this action under Section 13(b) of the Federal Trade Commission

Act ("FTC Act"), 15 U.S.C. § 53(b), to obtain permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other equitable relief for Defendant's acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).

3. Venue is proper in this district under 28 U.S.C. § 1391(b)(1), (b)(2), (b)(3), (c)(2), and 15 U.S.C. § 53(b).

PLAINTIFF

4. The FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C.
§ 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce.

5. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and to secure such equitable relief as may be appropriate in each case, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies. 15 U.S.C. §§ 53(b) and 56(a)(2)(A).

DEFENDANT

6. Defendant Stratford Career Institute, Inc. ("Stratford"), is a District of Columbia corporation with its principal place of business at 8675 Darnley Road, Mount-Royal, Quebec, Canada H4T 1X2. Stratford transacts or has transacted business in this district and throughout the United States.

COMMERCE

At all times material to this Complaint, Stratford has maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFENDANT'S BUSINESS ACTIVITIES

8. Since at least 1991, Stratford has operated a distance learning correspondence school. It enrolls approximately seventy thousand students per year and offers sixty-two different kinds of educational programs. It claims to have provided educational opportunities to over one million students.

2

9. Stratford advertises its programs through its website, scitraining.com, and by using Bing and Google keywords, letters to prospective students from its Director of Education, enrollment agreements, a brochure, magazine advertisements, inserts, and television commercials.

Stratford's most popular program is its high school diploma program ("the program"). Between May 2010 and April 2014, the full tuition price for the program was
 \$989.00, though various discounts available during that time period could lower the price considerably. The lowest discounted price for this time period, which was offered between May 2013 and April 2014, was \$441.75.

11. To induce consumers to purchase the program, Stratford has disseminated or caused to be disseminated advertisements and promotional materials, including but not necessarily limited to the attached Exhibits A through E. These materials include the following statements and depictions:

A. High School Diploma Distance Learning Course Summary

*

Get your high school diploma at home with Stratford Career Institute.

It's never too late to get your diploma. Stratford Career Institute can help you enjoy the pride and satisfaction of having earned your high school diploma, as well as the financial rewards that come with it. Stratford has already helped thousands of people. Now, we're ready to help you!

*

*

Stratford is the perfect choice for getting your high school diploma at home.

Stratford Career Institute has one of the most well known (sic) high school correspondence courses. Our years of quality career training have let people just like you know that we care about your future and want to see you succeed. In fact, more than one million people have enrolled with Stratford since 1991. You may see other courses out there, but Stratford's innovative combination of convenience, affordability, and quality distance learning materials make us a top choice.

(Exhibit A, www.scitraining.com/high_school_diploma)

B. High School Diploma Career Forecast

Getting your high school diploma can open up many doors for you.

Have the words "high school diploma required" kept you from getting a job? Then this is your chance to change all that!

Getting your diploma with Stratford gives you the competitive advantage you need for career success. Despite the fact that you may have a number of usable skills and qualities for a job, most employers require their workers to have a high school diploma.

Overall, having your high school diploma can help you get a better job with higher earnings, help you gain respect, or further your education with more specialized career training . . . all of which can build a more secure future for you and your family.

Individuals with a High School Diploma can make \$9,000 more per year.

* *

*Source: U.S. Bureau of Labor Statistics News Release USDL 10-0067.

(Exhibit A, www.scitraining.com/High School Diploma/Career Forecast)

C. High School Diploma Testimonials

*

"Getting my diploma was a big relief. I worked hard to accomplish my goals. Now, every time someone might ask if I got my high school diploma, I can say 'yes!' It has made me very happy." – Karen C.

"Getting my high school diploma has helped me further my career. It has also showed my kids that finishing school is very important in life and helps you get a better job." – Whitney H.

"After dropping out of high school, I promised everyone I would get my diploma. Few believed I would, but I did. Stratford was easy for me to understand. If you stick your mind to it, you can complete high school. I would definitely recommend this school." – Korena S.

(Exhibit A, www.scitraining.com/High_School_Diploma/Testimonials)

D. Each of the foregoing web pages has a picture of a framed, official-looking diploma with the school's name in a fancy font, the word "**Diploma**" in bold and in a large font, a seal, and signatures of purported school officials.

(Exhibit A, www.scitraining.com)

E. Dear _____,

Going back to school to get your **High School Diploma** is likely one of the best decisions you'll ever make.

Stratford can help you get the education that can open doors to job and career opportunities that were closed to you before. This can translate into better pay, higher satisfaction, and increased respect.

* * *

Stratford's high school diploma program covers all major subjects including:

- English
- Math
- Science
- History
- Government
- Social Studies
- Four Electives

(Exhibit B, Letter from Respondent's Director of Education and Enrollment Agreement)

F.

Your Future with a High School Diploma

Stratford can help you enjoy the pride and satisfaction of having earned your high school diploma as well as the financial rewards that come with it.

* *

What You Can Gain

*

*

Opportunity & Potential – A high school diploma can help open doors that were closed to you before. With a diploma in hand, you can qualify for better jobs, faster promotions, and higher pay. Just imagine what you can achieve!

* *

What You Can Earn:

According to the U.S. Bureau of Labor Statistics, individuals with a high school diploma are likely to earn \$9,000 more per year than those without a high school diploma.*

*Bureau of Labor Statistics, Current Population Survey, March 2012



What Stratford Graduates Say:

*

*

"My diploma changed my life for the better. I was promoted to a higher rank in my department. Even my wages went up." – Juan G.

"I have received a promotion with more pay. Thank you so much for all your help." – Nathaniel W.

"I get a lot more opportunities to look for jobs. Getting my diploma is what made that possible." – Bianca C.

(Exhibit C, High School Brochure)

*

G. Get Your Diploma at Home!

Don't have time to go back to school? Then let school come to you!

Career Training with Stratford can lead to ... A New Career ... Better Salary ... Faster Promotions

[There is a picture of a woman smiling and holding a large, framed diploma. Consumers are asked to choose one program from a list; the program at the top, in bold type, says "High School."]

(Exhibit D, Advertisement)

H. A picture of an official-looking diploma with the words "YOUR NAME HERE." To request information, consumers fill in the course name and their names and addresses on another picture of a diploma.

(Exhibit E, Insert)

- I. A television advertisement including the following dialogue: "Sure I want a better job where I can earn more money, but without a diploma what can I do?" "At Stratford Career Institute you can earn your High School diploma . . . at home." The advertisement also cites a U.S. Department of Labor study about the greater earning potential of people with high school diplomas.
- 12. To direct consumers to scitraining.com, Stratford has purchased Bing and Google

Keywords such as "official high school diploma," "real high school diploma online," "high school diploma equivalent," "legal high school diploma," "high school equivalency diploma," and state names in combination with the phrase "high school diploma."

13. In numerous instances in connection with the advertising, marketing, promotion,

offering for sale or sale of the program, Stratford represents or has represented that consumers

can successfully use its diploma as a valid secondary school equivalency credential when

seeking enrollment in higher educational institutions, applying for jobs, or for other purposes.

However, such representations are often false or misleading, or were not substantiated at the time

they were made.

14. Many consumers cannot use their Stratford diplomas to enroll in four-year

colleges and universities, community colleges, or vocational schools, or to obtain, keep, or

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advance in a job. Stratford's own records, including documents such as consumer complaints and survey responses, demonstrate that this is a widespread problem. According to those records and other evidence, prospective employers and admissions counselors decline to accept Stratford's diploma and tell consumers that they cannot use it as they would a diploma from a traditional high school.

15. Stratford diplomas cannot be used as valid secondary school equivalency credentials because, among other things, Stratford only requires its students to complete eighteen course units in order to obtain a diploma. In contrast, many states require students to earn more than eighteen course units in order to obtain a high school diploma, and to complete courses that Stratford does not offer, such as foreign language, laboratory science, fine arts, health, and physical education courses, and additional courses in mathematics.

16. Consumers who complete the program are often left having spent hundreds of dollars without obtaining a valid secondary school equivalency credential. As a result, they cannot use Stratford's diploma to enroll in institutions of higher education, to apply for jobs, or for other purposes.

VIOLATIONS OF THE FTC ACT

17. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits "unfair or deceptive acts or practices in or affecting commerce."

18. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

8

Count I False or Unsubstantiated High School Equivalency Credential Claim

19. Through the means described in Paragraphs 9 through 13, Stratford has represented, directly or indirectly, expressly or by implication, that consumers can successfully use Stratford's diplomas as valid high school equivalency credentials when seeking enrollment in higher educational institutions, applying for jobs, or for other purposes.

20. The representations set forth in Paragraph 19 are false or misleading or were not substantiated at the time the representations were made.

21. Therefore, the making of the representations set forth in Paragraph 19 of this Complaint constitutes a deceptive act or practice, in or affecting commerce in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

CONSUMER INJURY

22. Consumers have suffered and will continue to suffer substantial injury as a result of Stratford's violations of the FTC Act. In addition, Stratford has been unjustly enriched as a result of its unlawful acts or practices. Absent injunctive relief by this Court, Stratford is likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

THIS COURT'S POWER TO GRANT RELIEF

23. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt and redress violations of any provision of law enforced by the FTC. The Court, in the exercise of its equitable jurisdiction, may award ancillary relief, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies, to prevent and remedy any violation of any provision of law enforced by the FTC.

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PRAYER FOR RELIEF

Wherefore, Plaintiff FTC, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court's own equitable powers, requests that the Court:

A. Enter a permanent injunction to prevent future violations of the FTC Act by Stratford;

B. Award such relief as the Court finds necessary to redress injury to consumers resulting from Stratford's violations of the FTC Act, including but not limited to, rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies; and

C. Award Plaintiff FTC the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

Respectfully submitted,

JONATHAN E. NUECHTERLEIN General Counsel

Maria Del Monaco

MARIA DEL MONACO (0067930) AMY C. HOCEVAR (0075510) Federal Trade Commission East Central Region 1111 Superior Avenue, Suite 200 Cleveland, OH 44114 Phone (216) 263-3405 or 3409 Fax (216) 263-3426 mdelmonaco@ftc.gov ahocevar@ftc.gov

Attorneys for Plaintiff FEDERAL TRADE COMMISSION

Dated: 2/ls/16

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Exhibit A

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High School Diploma (Study at Home | High School Diploma Online



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About Us News	Business Management	Criminal Justice	Student Home	Renew Grades	16
Why Choose Stratford How It Works	Drug & Alcohol Treatment Spec	alist High School Diploma	Ask An Instructor	-Online Exams	LINE CORPORT MANAGEMENT - CORPORE STOCKED STOCKED
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High School Diploma | Course Outline | Stratford Career Institute



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High School Diploma | Career Forecast | Stratford Career Institute |



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High School Diploma | Testimonials | Stratford Career Institute



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High School Diploma Tuition and Pricing | Stratford Career Institute



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Exhibit B

CITO, 719 W

For a limited time get \$300 off the regular tuition price.

PLUS -- We offer affordable monthly payment plans with 0% interest!

Your all-inclusive tuition includes everything you need to complete your studies, including:

 Textbooks
 Study Guides
 Learning Aides
 Instructor Support

 Student Assignment Books * Exams · Online Student Center · Personalized Career Diploma

+Free Shipping & Handling

In addition to all of the school materials you receive, Stratford offers personal one-on-one support for every one of our students. Our dedication to our students' success is second to none, and we

Furthering your education is always a good idea as it can lead to a better job, higher pay, faster promotions and increased respect.

I have seen so many students benefit from our courses, and I am confident that we can help you meet your educational and career goals, too. Don't miss this opportunity to take the first step toward a brighter future.

Sincerely,

plan to keep it that way.

Claude Major, Ph.D. Director of Education

P.S. Remember that this is a limited-time, introductory discount, after which your special offer will expire. All you need to get started is a just a low, down payment. You can earoll online via our secure website www.sci-careers.com, by calling 1-800-556-4559, or by mailing the attached entoilment agreement. Don't miss this opportunity. Enroll today!

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Stratford-FTC-RFP-02081

The Stratford Career Institute Tuition Protection Agreement Your Assurance of Quality and Integrity

SERVICE GUARANTEE:

- Correspondence and phone calls from students receive top priority, sudhytractors are available to assist students year round.
- The estilos fee includes all charges for materials and instructional services, up to and helicking the issuing of a diploma once you have secensibly completed the program and fulfilled your financial oblighten.
- You are free to complete the program as quickly as you with, provided you al required dwalmakilous are completed with a passing grade. The mare at which you complete the program will not alter the payment pronstand schedule at set forth is this agreement.
- You have the right at any time to pay the outstanding balance owing on the account.
- Streeford agrees that there will be no minim increases during the life of this parentment.
- Streafford evaluates and obtains the latest and best text backs, produced by leading publishers in order to keep our grogeness up-to-date. Any changes will abray be improvements, and will rover dimusish the quality of the program.
- " In the event of a probaged illness or loss of employment fitmiford may effer, as its discretion, a deforment of your obligations under this agreement.

ENROLLMENT CANCELLATION POLICY AND CONDITIONS

Struttorial Career fushicuts is confident that the program in which you are encolling, will be eacherly to your satisfaction. To provide you with assumme that this will be the cree, this Tubiton Protection Agreement outlines our cancellation and refared policy.

1) You may cancel your program as asyline. Cancellation requests may be made in ony mannee, but it is seconstantial that you do so in writing by sending your request to: Seatland Cancer Institute, Shipping and Mailing Center, I Champlain Cammons, Unit 3, P.O. Box 1560 Saiot Albans VT 05478-5500.

2) If you notify SCI of concellation within S calendar days from the case you signed the encollment spreement, you will be refunded all movies part to the Action.

3) If you notify SCI after the five day period but before any leasant have been submitted for evaluation, you will own a orgistration for of 20% of the initial course price, not to exceed \$150.00.

4) If you notify SCI after five estandar days of having signed the environment, and after completing at least one lesson assignment by less them SOR of course assignments. SCI will charge dae non-principale registration for plus a percentage of the total coarse price which shall not exceed the following:

 a) If you complete up to and iacluding 10% of its program, you will be charged 10% of the refundable toking dultion charges remaining after subtraceing the nee-refendable fee already realized).



- b) Between 10% and 25% of the course, you will be charged 25% of the refundable trition.
- c) Between 20% and 50% of the course, you will be charged 50% of the refundable tailing.
- d) After you complete more than half the course, you will be charged the total course price.

Surdents are not eligible for mition relands after a period of five years from the date of enrollment. Any holder of this consumer contract is subject to all cisires and defenses which the deteor could arsert against the seller of goods or services obtained pursuant hereig or with the proceeds hereof. Recovery hereunder by the debtor shall not exceed the amount paid by the debtor harearder. Any and all liabilities shall be limited to the total course price to stippleted in this encolonizat contract. In the event that you do not make a payment within a period of four-een calcudar days of its due date, Szatford Career Institute may cencel this Enrollment Agreement. Under such conditions, the total course price obligation will be payable and due iromediately. The andent will not be eligible for any refunde, in whole or in nen. If the defination account is not remedied within features days of notice date. As a stadent, you agree to allow any authorized Serviced representative to contact you during business hours via your Emoil address re telephone/cellular number for any reason pertaining to your study program or financial account. Your signation on page one of this Service. Agreement indicates that you have read and understood all parts of the Agreement, and believe that you have the ability to benefit from this program.

LIMITATIONS OF PROMISE

Stratferd will provide you with assential instruction on how to propere a winning exame and perform well during the job interview. Our Director of Education will also provide you with a letter of recommendation to a propertive employer. However, Stratferd does not grownike employment as a direct result of completing one of its programs. Do not assume that credits you cam at this institution will be transferable to any other scheed, college or university. Ensure that you check with the reactiving institution.

PRIVACY POLICY.

Occasionally we make our student list available to organizations offering products or services that may be of interest to you. If you do not wish to receive these minings please send ostification, along with your man odd address to Strafford Career Institute Shipping and Mailing Center, F Champlein Commons, Unit 5, PO Box 1560, Stint Albans, VT 05478-5560, Strafford Career Institute's administration and corporate headquarters is located as 8757 furnicy Road, Meun-Royal, QC, HT 1X2,





Dear Dear

Going back to school to get your High School Diploma is likely one of the best decisions you'll ever make.

Stratford can help you get the education that can open up doors to job and enteer opportunities that were closed to you before. This can translate into better pay, higher satisfaction, and increased respect.

Best of all, you can complete your studies at home in your spare time!

There is no pressure, no deadlines, no scrembling to make up missed classes, and no cramming for examinations. In fact, many students obtain much better results through the horne study method than they did in the classroom. You can earn your diploma in as little as tix months, or take up to two years if you prefer.

Stratford's high school diploma program covers all major subjects including:

- English
- Math
- Science
- History
 Government
- Social Studies
- Four Electives

Stratford's high school diploma program has been specifically designed for today's husy adult. Our guided, independent study program allows you to study when it is most convenient for you, and our interest-free, monthly payment plans let you graduate debt-free.

Don't let the past influence what you can accomplish today. With a bit of determination you could be on your way to earning your diploma.

Right now, we are offering a considerable tuition discount to help you get started.

Continued on page two...

Look inside for details about a special tuition discount!

Maling/Shipping: 1 Champlain Commons, Unit J. RO, Box 1560, Saint Albans, VT 05478 Mair Office: 8675 Damley Road, Mount Royel, QC H4T 1X2

SAVE \$300!

High School

When you enroll by January 9, 2015

Citrices of Encoloneas Service

803 516 1589

Priority Code: 100 000

Why Choose Stratford?

Convenient Our guided, independent study formal means that you train at home when you have time.

Affordable Graduate debt-free with our pay-as-you-go monthly payment plans and 0% financing.

Practical Career-focused training programs allow you to gain real world knowledge that can quickly be applied in the workforce.

Trustworthy More than one million students worldwide have already trusted us with their educational needs. You can, too.

Three Easy Ways to Enroll!

MAIL your Enrollment Agreement

CALL 1-800-556-4559

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Exhibit C



With Stratford Career Institute, you can train at home in your spare time to get the skills and training needed to take the first step toward a rewarding, new career.

Stratford offers a real-world, practical curriculum written by professionals in your career field. This means that you can quickly apply what you learn in the workforce.

- No set classes to attend. Study at home when you have time.
- All course materials needed to graduate are sent directly to you.
- Affordable monthly payment plans with 0% interest
- Personal one-on-one support from instructors and staff
- Full range of student services
- · Comprehensive online learning center

Get started toward your brighter future today!

What Stratford Graduates Say:

"My diploma changed my life for the better. I was promoted to a higher rank in my department. Even my wages went up." – Juan G.

"I have received a promotion with more pay. Thank you so much for all your help." Nathaniel W.

"I get a lot more opportunities to look for jobs. Getting my diploma is what made that possible." – Bianca C.



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Stratford can help you enjoy the pride and satisfaction of having earned your high school diploma as well as the financial rewards that come with it.

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What You Can Gain

Opportunity & Potential - A high school diploma can help open doors that were closed to you before. With a diploma in hand, you can qualify for better jobs, faster promotions, and higher pay. Just imagine what you can achieve!

Respect & Pride - The personal rewards of having a high school diploma are also great. You can take pride in your accomplishment and quickly realize how having your diploma can enhance your life.

What You Can Earn:

According to the U.S. Bureau of Labor Statistics, individuals with a high school diploma are likely to earn nearly \$9,000 more per year than those without a high school diploma.*

Course Outline

Social Studies

- Successful attitudes and behaviors in the workplace
- Human behavior including psychology and sociology
- · Structure and functioning of society
- Managing stress in the workplace

American History

- · Political, social, and cultural history
- · Causes of independence
- · Geographical and economic expansion
- The causes and effects of the Civil War
- U.S. foreign policy in the 26th century

American Government

- The Constitution and American government
- Functions of the federal government
- * Federal and state governments
- · Contemporary American democracy

Science

- Ecosystems
- · Biology
- · Chemistry
- Physics
- · Environmental Science

Mathematics

- Basic arithmetic operations
- Decimals, fractions, and percents
- · Measurement, ratios, and proportions
- Introduction to basic algebra

- · Equations and exponents
- · Basic geometry
- · Business mathematics and statistics

English

- · Flements of grammatical structure
- · Major parts of speech
- · Reading and writing skills
- · Punctuation, capitalization, and spelling
- · Composition of outlines and essays
- · Writing a personal resume
- · Introduction to literature

Elective Options*

- · Beauty Care
- · Business Management
- · Criminal Justice
- · Earth Science
- Economics
- · Forensic Science
- · Foundations of Law
- · Fundamentals of Accounting
- · Gardening & Landscaping
- · Hotel & Restaurant Management
- Interior Decorating
- · Medical Terminology
- Microsoft Windows*
- Start Your Own Business
- · Understanding the PC
- · Veterinary Assistant
- · World Geography
- · World History

"You will what thus elective subjects during the course of your studies.

We take great pride in providing you with the most up-to-date textbooks and equipment. One or more of the above-membored subjects may, therefore, change if updating becauses receivery. The order in which the material is presented may vary. This program is specifically designed to serve as an introduction or enhancement of the theoretical knowledge required for the vacational application of this subject. It is intended to help individuals in the fortherance of their vacational training and is not introducted as a substitute for liversing at omiffestion requirements, which may include an apprenticed in our distribute for liversing at omiffestion requirements, which may include an apprenticed in or additional training, as required by law.

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Exhibit D



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Exhibit E

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