

*Before the*  
FEDERAL TRADE COMMISSION  
Washington, DC 20580

In the Matter of )  
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Scholarships.com, LLC, )  
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**Complaint, Request for Investigation, Injunction, and Other Relief**

**Submitted by**

**The Electronic Privacy Information Center**

**I. Introduction**

1. This complaint concerns the unfair and deceptive business practices of Scholarships.com, LLC, the publisher of a leading website that encourages student consumers to divulge sensitive medical, sexual orientation, religious, and political affiliation information for college scholarships and financial aid information.
2. Despite promising consumers that information submitted to Scholarships.com will be used to “maximize the effectiveness of the scholarship and college search,” Scholarships.com discloses student consumer information to its business affiliate, American Student Marketing (“ASM”), which in turn sells Scholarships.com user information for general marketing purposes. Scholarships.com also fails to use reasonable data security practices, such as Hypertext Transfer Protocol Secure (“HTTPS”), for communications between student consumers’ browsers and Scholarships.com’s website.
3. These representations violate Section 5 of the Federal Trade Commission Act and are actionable by the Commission.

**II. Parties**

4. The Electronic Privacy Information Center (“EPIC”) is a public interest research center located in Washington, D.C. EPIC focuses on emerging privacy and civil liberties issues and is a leading consumer advocate before the FTC. EPIC has a particular interest in protecting consumer privacy, and has played a leading role in developing the authority of the FTC to address emerging privacy issues and to safeguard the privacy rights of consumers.<sup>1</sup> EPIC’s 2010 complaint concerning Google Buzz provided the basis for the

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<sup>1</sup> See, e.g., Letter from EPIC Exec. Dir. Marc Rotenberg to FTC Comm’r Christine

Commission's investigation and subsequent settlement concerning the social networking service.<sup>2</sup> In that case, the Commission found that Google "used deceptive tactics and violated its own privacy promises to consumers when it launched [Buzz]."<sup>3</sup> The Commission's settlement with Facebook also followed from a Complaint filed by EPIC and a coalition of privacy and civil liberties organization in December 2009 and a Supplemental Complaint filed by EPIC in February 2010.<sup>4</sup> Recently, EPIC notified the Commission that Verizon had engaged in unfair and deceptive practices by materially and retroactively changing their privacy practices.<sup>5</sup> EPIC also has a pending complaint with the FTC concerning the Jay-Z app "Magna Carta."<sup>6</sup>

5. Scholarships.com<sup>7</sup> is a limited liability company with its principal place of business in Highland Park, Illinois. The company operates a website that allows student consumers to provide personal information in exchange for college recruitment, scholarship, and financial aid information.<sup>8</sup>

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Varney (Dec. 14, 1995) (urging the FTC to investigate the misuse of personal information by the direct marketing industry), [http://epic.org/privacy/internet/ftc/ftc\\_letter.html](http://epic.org/privacy/internet/ftc/ftc_letter.html); DoubleClick, Inc., *FTC* File No. 071-0170 (2000) (Complaint and Request for Injunction, Request for Investigation and for Other Relief), [http://epic.org/privacy/internet/ftc/DCLK\\_complaint.pdf](http://epic.org/privacy/internet/ftc/DCLK_complaint.pdf); Microsoft Corporation, *FTC* File No. 012 3240 (2002) (Complaint and Request for Injunction, Request for Investigation and for Other Relief), [http://epic.org/privacy/consumer/MS\\_complaint.pdf](http://epic.org/privacy/consumer/MS_complaint.pdf); Choicepoint, Inc., *FTC* File No. 052-3069 (2004) (Request for Investigation and for Other Relief), <http://epic.org/privacy/choicepoint/fcraltr12.16.04.html>.

<sup>2</sup> Press Release, Federal Trade Comm'n, *FTC Charges Deceptive Privacy Practices in Google's Rollout of Its Buzz Social Network* (Mar. 30, 2011), <http://ftc.gov/opa/2011/03/google.shtm> ("Google's data practices in connection with its launch of Google Buzz were the subject of a complaint filed with the FTC by the Electronic Privacy Information Center shortly after the service was launched.").

<sup>3</sup> *Id.*

<sup>4</sup> In the Matter of Facebook, Inc., (2009) (EPIC Complaint, Request for Investigation, Injunction, and Other Relief), <https://epic.org/privacy/infacebook/EPIC-FacebookComplaint.pdf> [hereinafter EPIC 2009 Facebook Complaint]; In the Matter of Facebook, Inc., (2010) (EPIC Supplemental Materials in Support of Pending Complaint and Request for Injunction, Request for Investigation and for Other Relief), [https://epic.org/privacy/infacebook/EPIC\\_Facebook\\_Supp.pdf](https://epic.org/privacy/infacebook/EPIC_Facebook_Supp.pdf) [hereinafter EPIC 2009 Facebook Supplement]; In the Matter of Facebook, Inc., (2010) (EPIC Complaint, Request for Investigation, Injunction, and Other Relief), [https://epic.org/privacy/facebook/EPIC\\_FTC\\_FB\\_Complaint.pdf](https://epic.org/privacy/facebook/EPIC_FTC_FB_Complaint.pdf).

<sup>5</sup> In re Verizon, Inc., (2011) (EPIC Complaint, Request for Investigation, Injunction, and Other Relief), <https://epic.org/privacy/ftc/EPIC-Verizon-FTC-Complaint-final.pdf>.

<sup>6</sup> In re Samsung, (2013) (EPIC Complaint, Request for Investigation, Injunction, and Other Relief), <https://epic.org/ftc/EPICsamsungcomplaintFINAL.pdf>.

<sup>7</sup> SCHOLARSHIPS.COM, <http://www.scholarships.com/main.aspx> (last visited Nov. 20, 2013) [hereinafter Exhibit A].

<sup>8</sup> See Exhibit A; *About Us*, SCHOLARSHIPS.COM, <http://www.scholarships.com/about-us/> (last visited Nov. 22, 2013) [hereinafter Exhibit B]; *Login*, SCHOLARSHIPS.COM, <http://www.scholarships.com/login.aspx> (last visited Nov. 22, 2013) [hereinafter Exhibit C].

### **III. Factual Background**

#### **A. Scholarships.com’s Business Practices Impact Millions of Student Consumers**

6. Since 1998, Scholarships.com has acquired personal data from more than 14 million students seeking information about educational scholarships from the company.<sup>9</sup>
7. Student consumers provide an enormous amount of detailed personal data to Scholarships.com, including health, financial, religious, political, and sexual orientation information.

#### **B. Scholarships.com Represents that Consumer Data Will be Used to Help Consumers Obtain Financial Assistance for College**

8. Scholarships.com advertises, “We can help you find money for school, even as colleges discover and recruit you. FREE!”<sup>10</sup>
9. Scholarships.com informs consumers to “Get recruited based on your college selections and the information you provide in your profile.”<sup>11</sup>
10. To register for the service, individuals are required to provide an identifying status (“Current Student,” “Parent/Guardian,” “Relative,” or “Educator/Counselor”), student’s current school year, date of birth, residence country, zip code, email address, and create a password.<sup>12</sup>
11. At the bottom of the registration page, Scholarships.com represents that “Scholarships.com can help you pay for college.”<sup>13</sup> Under that statement, consumers may either select “Yes, keep me informed” or “No, thank you” to the following statement: “Please keep me informed about the latest scholarships and grants, free information on financial aid, college admissions, student loans and other offers designed for students and parents. Scholarships.com may make the information I supply available to its marketing partners.”<sup>14</sup>

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<sup>9</sup> *Search Results—Scholarships.com*, APP ANNIE, <http://www.appannie.com/search/?q=scholarships.com&vertical=apps&market=ios> (last visited Dec. 11, 2013). *See also* Exhibit A.

<sup>10</sup> Exhibit A.

<sup>11</sup> Exhibit A.

<sup>12</sup> *Scholarship Search*, SCHOLARSHIPS.COM, <http://www.scholarships.com/scholarship-search.aspx> (last visited Nov. 20, 2013) [hereinafter Exhibit D].

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

12. After students have registered for Scholarships.com, the login page encourages students to “make sure your profile is complete. This is of the utmost importance, as a complete profile means more and better scholarship and college recruiting opportunities for you!”<sup>15</sup>
13. After students log in, Scholarships.com presents six questionnaire section pages: “Student Information”; “College Choices”; “Academic Information”; “Artistic/Athletic Information”; “Background Information”; and “Organization Information.”<sup>16</sup>
14. The “Student Information” and “Background Information” sections collect particularly sensitive consumer information.
15. At the top of the Student Information page, Scholarships.com represents that “Any and all of your responses during your search could impact your search results, so don’t skip anything! For the best search results, answer the below as completely and accurately as possible.”<sup>17</sup>
16. The Student Information page requires student name, gender, date of birth, current school year, year of financial need, grade point average, email, and student permanent home address.<sup>18</sup>
17. The Student Information page also collects marital status, citizenship, ethnicity, religious affiliation, and health information, including whether the student has ADD/ADHD, hepatitis, cancer related medical issues, digestive or mental impairments, and whether the student is clinically depressed or overweight.<sup>19</sup>
18. At the top of the Background Information page, Scholarships.com states, “Many scholarships in our database require the following information to determine whether you qualify for them. Please provide as much information as possible to ensure the best possible results.”<sup>20</sup>
19. The Background Information page requests family and parental income, parent employment information, and personal attribute information.<sup>21</sup> Personal attribute information reveals, for example, whether student consumers have current alcohol addictions or are recovering alcoholics; have parents who are illegal immigrants; are domestic abuse victims; have drug addictions or convictions; are lesbian, gay, bisexual, transgender (“LGBT”) or have an LGBT parent; and are political activists with the Democratic or Republican party.<sup>22</sup>

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<sup>15</sup> Exhibit C.

<sup>16</sup> *Student Information*, SCHOLARSHIPS.COM (last visited Nov. 20, 2013) [hereinafter Exhibit E].

<sup>17</sup> *Id.*

<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

<sup>20</sup> *Background Information*, SCHOLARSHIPS.COM (last visited Nov. 20, 2013) [hereinafter Exhibit F].

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

20. Scholarships.com’s Privacy Policy states:

Scholarships.com encourages its users to provide all of these fields of information so that users may maximize the effectiveness of the scholarship and college search. We ask if we may make that information available to our select list of marketing partners, which are reputable companies and organizations that provide products and services of interest to students and parents.<sup>23</sup>

21. Scholarships.com’s Privacy Policy further states:

When Scholarships.com shares your personal information with a third party as described in this Privacy Policy, your personal information will become permanently subject to the information use and sharing practices of the third party. . . . We will not share, sell, rent or otherwise transfer this information without the user's permission, and then only in accordance with the terms set forth in this Privacy Policy.<sup>24</sup>

22. Scholarships.com does not disclose in its Privacy Policy or Terms of Use that it provides student consumer information to American Student Marketing (“ASM”), the “exclusive manager” of Scholarships.com data.<sup>25</sup>

### **C. Scholarships.com Gives Consumer Data to American Student Marketing**

23. ASM’s data file is “comprised of youth and young adult data composed only of 100% self-reported information from students and parents searching for college and financial aid information” via Scholarships.com.<sup>26</sup>

24. ASM “offer[s] various ways to custom-tailor marketing efforts to ensure ideal fit and engagement.”<sup>27</sup> ASM encourages marketers to select lists by “age, ethnicity, academic major, recreational interests, etc. Whatever you feel is necessary to reach the student, young professional or parent you desire.”<sup>28</sup>

25. ASM’s “Data Select Sample Query” provides more information on the type of student consumer information that Scholarships.com provides to ASM and that ASM sells, including phone numbers; grade point averages; standardized test scores; citizenship and

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<sup>23</sup> *Privacy Policy—About Us*, SCHOLARSHIPS.COM, <http://www.scholarships.com/about-us/privacy-policy/> (last visited Nov. 20, 2013) [hereinafter Exhibit G].

<sup>24</sup> *Id.*

<sup>25</sup> *Id.* See also *Terms of Use—About Us*, SCHOLARSHIPS.COM, <http://www.scholarships.com/about-us/terms-of-use/> (last visited Nov. 20, 2013) [hereinafter Exhibit H].

<sup>26</sup> AMERICAN STUDENT MARKETING, <http://www.americanstudentmarketing.us/> (last visited Nov. 20, 2013) [hereinafter Exhibit I].

<sup>27</sup> *Id.*

<sup>28</sup> *Id.*

ethnicity information; academic majors; disability information such as ADD/ADHD, clinical depression, cancer, digestive impairments, hepatitis, dyslexia, and sickle cell disease; religious affiliations; extracurricular organizations; honor organizations; and other information such as whether student consumers have current alcohol addictions or are recovering alcoholics; have parents who are illegal immigrants; are domestic abuse victims; have drug addictions or convictions; are LGBT or have an LGBT parent; and are political activists with the Democratic or Republican party.<sup>29</sup>

26. ASM sells sensitive student consumer information for a variety of “marketing opportunities,” including “attire, accessories, cosmetics, electronic equipment, cell phones, computers and computer accessories, test-prep organizations, trade and career education institutions, scholarships, loans, credit cards, textbooks, magazines, CD’s and CD players, [and] MP3 players and databases.”<sup>30</sup>

#### **D. Scholarships.com Fails to Disclose or Adequately Disclose that it Gives Student Consumer Information to ASM**

27. Scholarships.com gives student consumer information to ASM not only for scholarship purposes, but also for general marketing purposes.
28. Scholarships.com fails to disclose or adequately disclose that it will give all student consumer information to ASM for general marketing purposes.

#### **E. Scholarships.com Represents to Student Consumers that it Secures Their Personal Data**

29. Scholarships.com states that “Scholarships.com is committed to safeguarding users' privacy on our website.”<sup>31</sup>
30. Scholarships.com states, “You can feel confident that your user profile will be protected when you visit Scholarships.com. We have security measures in place to protect against the loss, misuse and alteration of all user information under our control.”<sup>32</sup>
31. Scholarships.com states that “We follow generally-accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it.”<sup>33</sup>

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<sup>29</sup> *Sample Data Query*, AMERICAN STUDENT MARKETING, <http://www.americanstudentmarketing.us/samplequery.htm> (last visited Nov. 20, 2013) [hereinafter Exhibit J].

<sup>30</sup> *LGBT (Lesbian/Gay/Bisexual/Transgender)*, AMERICAN STUDENT MARKETING, <http://www.americanstudentmarketing.us/lgbt-lesbian-gay-bisexual-transgender.aspx> (last visited Nov. 20, 2013) [hereinafter Exhibit K].

<sup>31</sup> Exhibit G.

<sup>32</sup> Exhibit G.

<sup>33</sup> Exhibit G.

## **F. Scholarships.com Fails to Encrypt its Website**

32. Scholarships.com fails to employ Hypertext Transfer Protocol Secure (“HTTPS”).<sup>34</sup> Therefore, communications between student consumers’ computers and Scholarships.com’s website are unencrypted.
33. Scholarships.com fails to employ HTTP Strict Transport Security (“HSTS”).<sup>35</sup> Therefore, communications between student consumers’ computers and Scholarships.com’s website are vulnerable to certain attacks designed to force users to communicate with the website via an insecure connection.
34. Enabling HTTPS and HSTS is an industry-standard best practice.

## **G. The FTC has Established that the Information Collected by Scholarships.com is Sensitive**

35. In its March 2012 privacy report, the Commission recognized that “information about children, financial and health information” is sensitive and that the “likelihood that [this sensitive] data misuse could lead to embarrassment, discrimination, or other harms is increased.”<sup>36</sup>
36. The Commission has urged heightened disclosure and consent requirements for mobile apps that collect sensitive information, or “content that consumers would find sensitive in many contexts, such as contacts, photos, calendar entries, or the recording of audio or video content.”<sup>37</sup>
37. The Commission has established that disclosure of sensitive information is an unfair business practice.<sup>38</sup>

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<sup>34</sup> See Exhibits. A – H (noting that Scholarships.com’s website returns a non-HTTPS response).

<sup>35</sup> See Exhibits A-H (noting that Scholarships.com’s website returns a non-HTTPS response. Strict-Transport-Security headers may only be sent through an HTTPS response.).

<sup>36</sup> FED. TRADE COMM’N, PROTECTING CONSUMER PRIVACY IN AN ERA OF RAPID CHANGE: RECOMMENDATIONS FOR BUSINESSES AND POLICYMAKERS 47 (March 2012), *available at* <http://ftc.gov/os/2012/03/120326privacyreport.pdf>.

<sup>37</sup> FED. TRADE COMM’N, MOBILE PRIVACY DISCLOSURES: BUILDING TRUST THROUGH TRANSPARENCY ii (Feb. 2013), *available at* <http://www.ftc.gov/os/2013/02/130201mobileprivacyreport.pdf>.

<sup>38</sup> In the Matter of DesignerWare, LLC, (2013), *available at* <http://www.ftc.gov/os/caselist/1123151/designerware/120925designerwarecmpt.pdf> (discussing disclosure of “private details of individual and family life, including, for example, images of visitors, children, family interactions, partially undressed individuals, and couples engaged in intimate activities”).

## H. The FTC has Established that Failure to Use Encryption is an Unfair and Deceptive Data Security Practice

38. In its March 2012 privacy report, the Commission stated, “It is well settled that companies must provide reasonable security for consumer data” and specifically mentioned the use of Secure Socket Layer encryption by Google, Mozilla, and Twitter.<sup>39</sup>
39. The Commission has established that a representation of data security coupled with the failure to encrypt the transmission of personal data is a deceptive business practice.<sup>40</sup>
40. The Commission has established that failure to encrypt the transmission of personal data is an unfair business practice.<sup>41</sup>

## V. Legal Analysis

### A. The FTC’s Section 5 Authority

41. The FTC Act prohibits unfair and deceptive acts and practices, and empowers the Commission to enforce the Act’s prohibitions.<sup>42</sup> These powers are described in FTC Policy Statements on Deception<sup>43</sup> and Unfairness.<sup>44</sup>
42. A trade practice is unfair if it “causes or is likely to cause substantial injury to consumers which is not reasonably avoidable by consumers themselves and not outweighed by countervailing benefits to consumers or to competition.”<sup>45</sup>
43. The injury must be “substantial.”<sup>46</sup> Typically, this involves monetary harm, but may also include “unwarranted health and safety risks.”<sup>47</sup> Emotional harm and other “more

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<sup>39</sup> FED. TRADE COMM’N, *supra* note 36, at 25-26.

<sup>40</sup> *See, e.g.*, FTC v. Rennert, Complaint, FTC File No. 992 3245, <http://www.ftc.gov/os/2000/07/iogcomp.htm> (2000); In re Eli Lilly, Complaint, File No. 012 3214, <http://www.ftc.gov/os/2002/05/elilillycmp.htm> (2002).

<sup>41</sup> *See, e.g.*, In re Rite Aid, Complaint, FTC File No. 072 3121, <http://www.ftc.gov/os/caselist/0723121/101122riteaidcmpt.pdf> (2010); In re CVS Caremark, Complaint, FTC File No. 072 3119, <http://www.ftc.gov/os/caselist/0723119/090623cvscmpt.pdf> (2009); United States v. PLS Financial Services, Complaint, FTC File No. 1023172, <http://ftc.gov/os/caselist/1023172/121107plspaydaycmpt.pdf> (2012); United States v. American United Mortgage Company.

<sup>42</sup> *See* 15 U.S.C. § 45 (2010).

<sup>43</sup> Fed. Trade Comm’n, FTC Policy Statement on Deception (1983), available at <http://www.ftc.gov/bcp/policystmt/ad-decept.htm> [hereinafter FTC Deception Policy].

<sup>44</sup> Fed. Trade Comm’n, FTC Policy Statement on Unfairness (1980), available at <http://www.ftc.gov/bcp/policystmt/ad-unfair.htm> [hereinafter FTC Unfairness Policy].

<sup>45</sup> 15 U.S.C. § 45(n); *see, e.g.*, *Fed. Trade Comm’n v. Seismic Entertainment Productions, Inc.*, Civ. No. 1:04-CV-00377 (Nov. 21, 2006) (finding that unauthorized changes to users’ computers that affected the functionality of the computers as a result of Seismic’s anti-spyware software constituted a “substantial injury without countervailing benefits.”).

<sup>46</sup> FTC Unfairness Policy, *supra* note 44.

<sup>47</sup> *Id.*; *see, e.g.*, *Fed. Trade Comm’n v. Information Search, Inc.*, Civ. No. 1:06-cv-01099 (Mar. 9, 2007) (“The invasion of privacy and security resulting from obtaining and selling confidential customer phone records without



subjective types of harm” generally do not make a practice unfair.<sup>48</sup> Secondly, the injury “must not be outweighed by an offsetting consumer or competitive benefit that the sales practice also produces.”<sup>49</sup> Thus the FTC will not find a practice unfair “unless it is injurious in its net effects.”<sup>50</sup> Finally, “the injury must be one which consumers could not reasonably have avoided.”<sup>51</sup> This factor is an effort to ensure that consumer decision making still governs the market by limiting the FTC to act in situations where seller behavior “unreasonably creates or takes advantage of an obstacle to the free exercise of consumer decisionmaking.”<sup>52</sup> Sellers may not withhold from consumers important price or performance information, engage in coercion, or unduly influence highly susceptible classes of consumers.<sup>53</sup>

44. The FTC will also look at “whether the conduct violates public policy as it has been established by statute, common law, industry practice, or otherwise.”<sup>54</sup> Public policy is used to “test the validity and strength of the evidence of consumer injury, or, less often, it may be cited for a dispositive legislative or judicial determination that such injury is present.”<sup>55</sup>
45. The FTC has stated that “[s]ometimes public policy will independently support a Commission action. This occurs when the policy is so clear that it will entirely determine the question of consumer injury, so there is little need for separate analysis by the Commission.”<sup>56</sup>
46. An act or practice is deceptive if it involves a representation, omission, or practice that is likely to mislead the consumer acting reasonably under the circumstances, to the consumer’s detriment.”<sup>57</sup>
47. There are three elements to a deception claim. First, there must be a representation, omission, or practice that is likely to mislead the consumer.<sup>58</sup> The relevant inquiry for this factor is not whether the act or practice actually misled the consumer, but rather whether it is likely to mislead.<sup>59</sup>

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the consumers’ authorization causes substantial harm to consumers and the public, including, but not limited to, endangering the health and safety of consumers.”).

<sup>48</sup> FTC Unfairness Policy, *supra* note 44.

<sup>49</sup> *Id.*

<sup>50</sup> *Id.*

<sup>51</sup> *Id.*

<sup>52</sup> *Id.*

<sup>53</sup> *Id.*

<sup>54</sup> *Id.*

<sup>55</sup> *Id.*

<sup>56</sup> *Id.*

<sup>57</sup> FTC Deception Policy, *supra* note 43.

<sup>58</sup> FTC Deception Policy, *supra* note 43; *see, e.g., Fed Trade Comm’n v. Pantron I Corp.*, 33 F.3d 1088 (9th Cir. 1994) (holding that Pantron’s representation to consumers that a product was effective at reducing hair loss was materially misleading, because according to studies, the success of the product could only be attributed to a placebo effect, rather than on scientific grounds).

<sup>59</sup> FTC Deception Policy, *supra* note 43.

48. Second, the act or practice must be considered from the perspective of a reasonable consumer.<sup>60</sup> “The test is whether the consumer’s interpretation or reaction is reasonable.”<sup>61</sup> The FTC will look at the totality of the act or practice and ask questions such as “how clear is the representation? How conspicuous is any qualifying information? How important is the omitted information? Do other sources for the omitted information exist? How familiar is the public with the product or service?”<sup>62</sup>
49. Finally, the representation, omission, or practice must be material.<sup>63</sup> Essentially, the information must be important to consumers. The relevant question is whether consumers would have chosen another product if the deception had not occurred.<sup>64</sup> Express claims will be presumed material.<sup>65</sup> Materiality is presumed for claims and omissions involving “health, safety, or other areas with which the reasonable consumer would be concerned.”<sup>66</sup>
50. The FTC presumes that an omission is material where “the seller knew, or should have known, that an ordinary consumer would need omitted information to evaluate the product or service, or that the claim was false . . . because the manufacturer intended the information or omission to have an effect.”<sup>67</sup>

**B. Count I: Scholarships.com’s Misrepresentations Constitute Deceptive Trade Practices**

51. As set forth above, Scholarships.com represents to student consumers that it will use student information to assist students in finding scholarships and financial aid.
52. In fact, Scholarships.com discloses student information to American Student Marketing, who in turn sells student information for general marketing purposes.
53. As set forth above, Scholarships.com represents to student consumers that it will protect the security of their personal data.
54. In fact, Scholarships.com fails to follow reasonable security practices, including enabling HTTPS and HSTS for the transmission of information between student consumers and the Scholarships.com website.

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<sup>60</sup> *Id.*

<sup>61</sup> *Id.*

<sup>62</sup> *Id.*

<sup>63</sup> *Id.*

<sup>64</sup> *Id.*

<sup>65</sup> *Id.*

<sup>66</sup> *Id.*

<sup>67</sup> *Cliffdale Associates, Inc.*, 103 F.T.C. 110, 110 (1984).

55. Facts about the purpose for which data was collected and the failure to employ reasonable data security practices would be material to users in their decision to use Scholarships.com.
56. Therefore, Scholarships.com's failure to disclose or adequately disclose the material information described above constitutes a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

**C. Count II: Scholarships.com's Disclosure of Sensitive Student Consumer Information Constitutes an Unfair Trade Practice**

57. Scholarships.com creates substantial consumer injury by collecting sensitive health information from students over an unencrypted connection.
58. Young adults afflicted with illness and in need of financial support are a particularly vulnerable subset of the population.
59. Public policy supports the disclosure of the purposes for which information is collected and used.
60. Student consumers could not reasonably avoid the inadequate disclosures regarding the purposes for which their data was collected.
61. Countervailing benefits to consumers or to competition do not outweigh the inadequate disclosures and unencrypted web connection.
62. Therefore, Scholarships.com's disclosure of sensitive student consumer information constitutes an unfair act or practice in violation of Section 5 of the FTC Act, 15 U.S.C. §§ 45(a) and 45(n).

**D. Count III: Scholarships.com's Failure to Use Reasonable Data Security Practices Constitute an Unfair Trade Practice**

63. Scholarships.com's failure to encrypt its website causes substantial injury by leaving millions of student consumers vulnerable to security breaches.
64. Public policy supports the use of encryption.
65. Student consumers cannot reasonably avoid the risks created by poor data security because they do not control the Scholarships.com website.
66. Scholarships.com's failure to use encryption is not outweighed by countervailing benefits to consumers or to competition.

67. Therefore, Scholarships.com's failure to use reasonable data security practices constitutes an unfair act or practice in violation of Section 5 of the FTC Act, 15 U.S.C. §§ 45(a) and 45(n).

**VI. Prayer for Investigation and Relief**

68. EPIC urges the Commission to investigate Scholarships.com., enjoin Scholarships.com from its unfair and deceptive data collection practices, and require Scholarships.com to protect student consumer privacy.

69. Specifically, EPIC requests the Commission to:

- a. Require Scholarships.com to improve its data security practices and encrypt its website;
- b. Require the company to cure any deceptive statements;
- c. Provide such other relief as the Commission finds necessary and appropriate.

70. EPIC reserves the right to supplement this petition as other information relevant to this proceeding becomes available.

Respectfully Submitted,

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# **Exhibit A**

**Scholarships.com Homepage**



# Find College Scholarships While Colleges Recruit You



**Scholarships.com**  
Search Scholarships & Colleges On The Go!

We can help you find money for school, even as colleges discover and recruit you. **FREE!**  
Start now. Find money for college. Get found by colleges.

- Find Scholarships, Grants & Loans
- Research & Get Recruited by Colleges Nationwide
- Always Been FREE. Always Will Be

[Start Your Search >](#)



### We're the Best & We're FREE

Since 1998, we've helped millions of students, parents and counselors search 2.7 million local, state & national college scholarships & grants worth over \$1.9 billion!

### Win Scholarships & Be Recruited

Find FREE money. Get recruited based on your college selections and the information you provide in your profile. The best part is that it will only take you a few minutes to complete.

### Find Colleges

We'll make sure they find you, too. You tell us what is most important to you in a college or university and we will help you find each other.

### We Help Educators, Too

Order FREE student resource materials for your school! Great for College Financial Aid Night, workshops, College Open Houses & visits, schools' counselor's offices and more.

- Home
- Scholarship Search
- Financial Aid
- College Search
- College Scholarships
- List Your Scholarship
- Educators
- Scholarship Application Strategies
- Scholarship Information
- Scholarship Contests & Sweepstakes

- Scholarships Trending Now
- Scholarships By Grade Level
- Scholarships By Major
- Scholarships By State
- Scholarships By Type
- Scholarships.com Scholarships
- Scholarships for Women
- Sports Scholarships
- Minority Scholarships
- Unusual Scholarships
- First In Family/First Generation

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- Federal Aid
- Financial Aid Information
- Financial Aid Tips
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- Funding Your Education
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## **Exhibit B**

### **Scholarships.com “About Us” Page**

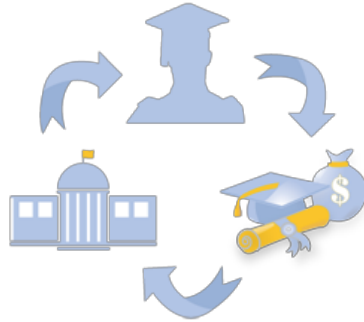


## About Us

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## About Us

Since our founding in 1998, Scholarships.com has helped students find money for college as well as learn about the entire financial aid process. Over the years, we've become one of the most widely-used and trusted free college scholarship search and financial aid information resources on the Internet and have been recognized by high schools, colleges and universities nationwide. We've built solid relationships with colleges and universities across the country and want to provide students with the opportunity to not only interact with prospective colleges but to be recruited by them as well. And it's all FREE. Check out what else we have to offer:



### For Students

Scholarships.com makes finding the right college and the scholarships to pay for it faster than ever before with a few easy steps:

- ▶ Our Scholarship Search allows you to search more than 2.7 million college scholarships and grants worth more than \$1.9 billion.
- ▶ The College Matchmaker can help you find the perfect school that fits your background and interests.
- ▶ Our College Directory offers detailed information on more than 7,000 colleges, including admission statistics, tuition and fees, financial aid and scholarships, academic majors and more.

### For High School Counselors

In order to help counselors better guide their students through the scholarship application process, we've prepared printable guides that provide information on everything from how to fund your education to an academic calendar to keep students on track and in the know throughout high school!

- ▶ The Educators' Resource Center is filled with free downloadable and printable items including academic calendars, top 10 lists and posters.
- ▶ Need some handouts and informational decorations for your school's financial aid night? Want hats, t-shirts, mouse pads and pens to reward your most dedicated students? It's all available here at no cost to you.

### For College Admissions Staff/Advisers

Our college recruitment portal allows you to create your ideal class. Our services go above and beyond what's available on traditional college applications: Searches can be customized on a daily basis and files of prospective students will be sent directly to your inbox and we offer the ability to sort prospects in our database by the criteria most important to you and your objectives. You will find students not just for who they appear to be on paper – you'll get to know who they are as people and the assets they will be to your institution. Scholarships.com offers a variety of ways for you to reach out to a specific audience:

- ▶ Connect with students in a way you can't via college applications and transcripts & discover the assets they will be to your institution months prior to the application process.
- ▶ Mix & match online & email strategies to target specific students. Determining your objectives will allow you to sort prospects by the criteria most important to you & your school.

**NCSA Athletes earn an average \$18,000 in scholarships each year**

[LEARN MORE](#)

**NCSA**  
ATHLETIC RECRUITING

**COLLEGE PROWLER**  
BY STUDENTS. FOR STUDENTS.

**\$2000 "NO ESSAY" SCHOLARSHIP**  
MONTHLY DRAWING. ANYONE CAN WIN.

[APPLY NOW!](#)

**Need money for the fall semester?**

Compare private loan options and get an approval decision in just *minutes!*

[Apply Now ▶](#)

POWERED BY  
**PrivateStudentLoans.com**



### Latest College & Financial Aid News

[Colorado State U. Adds Women's Soccer, Nixes Water Polo in Order to Comply with Title IX](#)

November 21, 2013



- ▶ Gain unlimited access to our student database for customizable searches. Specify GPA, test scores, extracurricular interests & more to build your ideal class.
- ▶ Learn what students are interested & students who fit your school's profile then explore the best ways to connect with them.
- ▶ Interact with the students most likely to succeed at your school to ensure they are the ones filling your hallowed halls.
- ▶ Manage your candidates with up-to-date online tracking. If your needs change, our system can reflect your new goals in just a few mouse clicks. For more information about the advertising and promotional services offered at Scholarships.com, please contact our business development team.

Our privacy practices have been reviewed and approved by TRUSTe, and we are a member of the following professional organizations:



[National Scholarship Providers Association \(NSPA\)](#)



[National Association for College Admission Counseling \(NACAC\)](#)

by [Suada Kolovic](#)

Four decades after Title IX was enacted, many colleges and universities across the country still struggle with the gender-equity requirements. If you're not familiar with Title IX, allow me to give you a brief synopsis: The law states: "no person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under [...]"

#### [Conservative Student Group Criticized for "Catch an Illegal Immigrant" Game](#)

November 19, 2013

by [Suada Kolovic](#)

In general, college is viewed as the sacred time in your young adult life where you make connections that will last a lifetime, take part in heavily heated debates on issues you're passionate about and play games where you're rewarded with a \$25 gift card to the Olive Garden for "catching" illegal immigrants. Wait...something about the latter statement seems WAY too terrible and offensive to be [...]

#### [SOTW: Elk's National Foundation Most Valuable Student Scholarship](#)

November 18, 2013

by [Suada Kolovic](#)

The Elks National Foundation will award 500

four-year scholarships to the highest-rated applicants in this year's competition. Ranging from \$1,000 per year to \$15,000 per year, Most Valuable Student scholarships are for students pursuing a four-year degree, on a full-time basis (minimum of 12 semester hours), in a U.S. American college or university. Any high school senior who is a citizen of [...]

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# **Exhibit C**

## **Scholarships.com Login Page**



## Welcome Back to Scholarships.com

Once you have logged-in, make sure your profile is complete. This is of the utmost importance, as a complete profile means more and better scholarship and college recruiting opportunities for you!

### Login

#### Email Address

#### Password



[Forgot your password?](#)

[New to Scholarships.com?](#)

### Student Loans

- ▶ [SallieMae Smart Option Student Loan - Pay For College The Smart Way](#)

### Scholarships, Sweepstakes & Contests

- ▶ [Enter the ScholarshipPoints.com \\$10,000 Scholarship](#)
- ▶ [Zinch's Weekly "Three Sentence Essay" Scholarship](#)
- ▶ [College Prowler \\$2,000 No Essay Scholarship](#)
- ▶ [The "Tell A Friend" Scholarship Sweepstakes](#)



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## **Exhibit D**

# **Scholarships.com Registration Page**



## Scholarship Search

### Start Your Free College Scholarship Search Here

We'll help you find free scholarships, grants and financial aid. In just a few minutes, you could find tens of thousands of dollars in free college scholarship money! Spend a *little* time, save a *lot* of money and attend the college that is the best fit for you!

I am a (Required)

Current Student

My current school year

Select School Year

Please select current school year.

My date of birth is

Month  Day  Year

Please select date of birth.

My residence country is

United States of America

My ZIP Code is

U.S. residents please supply your 5 digit ZIP Code.

Please enter either a ZIP Code or postal code.

Email Address

Please enter a valid Email address.

Password (Must be 6 to 12 characters)

Password is required.

Verify Password (Re-enter your password)

Scholarships.com can help you pay for college. (Required)

Please keep me informed about the latest scholarships and grants, free information on financial aid, college admissions, student loans and other offers designed for students and parents. Scholarships.com may make the information I supply available to its marketing partners.

Yes, keep me informed.  No, thank you.

By clicking "Continue", I agree to the [Terms of Use](#) & [Privacy Policy](#)



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# **Exhibit E**

## **Scholarships.com Student Information**



## Student Information

Any and all of your responses during your search could impact your search results, so don't skip anything! For the best search results, answer the below as completely and accurately as possible!

### Personal Information

<b>Current School Year</b> (Required) <input type="text" value="Select Current School Year"/>	<b>Year of Financial Need</b> (Required) <input type="text" value="Select Year of Financial Need"/>
<b>Grade Point Average</b> (4 Point Scale, Required) <input type="text"/>	<b>Date of Birth</b> (Required) <input type="text" value="January"/> <input type="text" value="1"/> <input type="text" value="1920"/>
<b>First Name</b> (Required) <input type="text"/>	<b>Last Name</b> (Required) <input type="text"/>
<b>Gender</b> (Required) <input type="text" value="Select Your Gender"/>	<b>Marital Status</b> <input type="text" value="Single"/>
<b>U.S. Citizen</b> <input type="text" value="Yes"/>	<b>Email Address</b> (Required) <input type="text"/>

### Student's Permanent Home Address

<b>Country</b> (Required) <input type="text" value="United States of America"/>	<b>Street Address</b> (Required) <input type="text"/>	<b>Apt/Suite</b> <input type="text"/>
<b>City</b> (Required) <input type="text"/>	<b>State</b> (Required) <input type="text" value="(None Selected)"/>	<b>ZIP Code</b> (ZIP is required, Plus 4 is optional) <input type="text"/> - <input type="text"/>

### Ethnicity

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> African American       | <input type="checkbox"/> Native American | <input type="checkbox"/> Caucasian                    |
| <input type="checkbox"/> Hispanic               | <input type="checkbox"/> Alaska Native   | <input type="checkbox"/> Other Ethnic/Racial Heritage |
| <input type="checkbox"/> Asian/Pacific Islander |  |   |

### Religion

- |  |   |   |   |
|--|---|---|---|
| <input type="checkbox"/> Agnostic          | <input type="checkbox"/> Church of Jesus Christ - LDS | <input type="checkbox"/> Jainism        | <input type="checkbox"/> Protestant                 |
| <input type="checkbox"/> Amish             | <input type="checkbox"/> Church of the Brethren       | <input type="checkbox"/> Jesuit         | <input type="checkbox"/> Quaker                     |
| <input type="checkbox"/> Atheist           | <input type="checkbox"/> Confucianism                 | <input type="checkbox"/> Judaism/Jewish | <input type="checkbox"/> Reformed Church in America |
| <input type="checkbox"/> Baha'i            | <input type="checkbox"/> Disciples of Christ          | <input type="checkbox"/> Lutheran       | <input type="checkbox"/> Romanian Orthodox          |
| <input type="checkbox"/> Baptist           | <input type="checkbox"/> Episcopal                    | <input type="checkbox"/> Mennonite      | <input type="checkbox"/> Shinto                     |
| <input type="checkbox"/> Buddhism          | <input type="checkbox"/> Evangelical                  | <input type="checkbox"/> Methodist      | <input type="checkbox"/> Sikhism                    |
| <input type="checkbox"/> Catholic          | <input type="checkbox"/> Greek Orthodox               | <input type="checkbox"/> Nonreligious   | <input type="checkbox"/> Taoism                     |
| <input type="checkbox"/> Christian Science | <input type="checkbox"/> Hinduism                     | <input type="checkbox"/> Paganism       | <input type="checkbox"/> Unitarian                  |
| <input type="checkbox"/> Christianity      | <input type="checkbox"/> Islam/Muslim                 | <input type="checkbox"/> Presbyterian   | <input type="checkbox"/> Zoroastrianism             |
| <input type="checkbox"/> Church of Christ  |   |   |   |

### Disabilities/Impairments

- |   |  |  |  |
|---|--|--|--|
| <input type="checkbox"/> ADD/ADHD             | <input type="checkbox"/> Disabled Parent | <input type="checkbox"/> Hepatitis                 | <input type="checkbox"/> Primary Immune Deficiency |
| <input type="checkbox"/> Allergies            | <input type="checkbox"/> Dyslexia        | <input type="checkbox"/> Kidney Related Impairment | <input type="checkbox"/> Relative w/ Alzheimer's   |
| <input type="checkbox"/> Arthritis/Rheumatism | <input type="checkbox"/> Epilepsy        | <input type="checkbox"/> Learning Disability       | <input type="checkbox"/> Respiratory Impairment    |

### Scholarships in 6 Easy Steps:

(Use to navigate between sections)

<b>Student Information</b>
College Choices
Academic Information
Artistic/Athletic Information
Background Information
Organization Information

*I have won over fifteen scholarships totaling over \$50,000 in awards, including some titles like Dell and Coke Scholar, which is an amazing honor. I would not have found these opportunities without Scholarships.com.*  
- Molly L.



*Molly was awarded several scholarships, including the \$20,000 Dell Scholarship & the \$10,000 Coca-Cola Scholarship*

*I currently attend Dartmouth, and with the financial help of these scholarships plus others, my Ivy League education is fully paid for! It is worth it to log onto Scholarships.com and apply.*  
- Ryan F.



*Ryan was awarded several scholarships, including the \$40,000 Ron Brown Scholarship, the \$20,000 Dell Scholarship & the \$10,000 Coca-Cola*

*Scholarship*

[Send Us Your Success Story](#)

- |   |   |  |  |
|---|---|--|--|
| <input type="checkbox"/> Cancer Related           | <input type="checkbox"/> Glycogen Storage Disease | <input type="checkbox"/> Medical Disability    | <input type="checkbox"/> Sickle Cell Disease                 |
| <input type="checkbox"/> Clinically Depressed     | <input type="checkbox"/> Hearing Impaired Parent  | <input type="checkbox"/> Mental Impairment     | <input type="checkbox"/> Spina Bifida                        |
| <input type="checkbox"/> Clinically Overweight    | <input type="checkbox"/> Hearing Impairment       | <input type="checkbox"/> Phenylketonuria (PKU) | <input type="checkbox"/> Visual Impairment                   |
| <input type="checkbox"/> Developmental Impairment | <input type="checkbox"/> Hemophilia               | <input type="checkbox"/> Physical Impairment   | <input type="checkbox"/> Wheelchair User/Mobility Challenged |
| <input type="checkbox"/> Digestive Impairment     |   |  |  |

**MyView Research Community**

**Take quick online surveys about stuff you like, whenever and wherever you have Internet access.**

Have a few minutes between classes? On the bus? Take a survey or three!

You'll earn valuable rewards to spend all over the Web including Amazon, iTunes, Visa, Kohls, GameStop and many more.



- Yes, I authorize Scholarships.com to share my email address with MyView.**
- No, thank you.

Continue



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# **Exhibit F**

## **Scholarships.com Background Information**



## Background Information

Many scholarships in our database require the following information to determine whether you qualify for them. Please provide as much information as possible to ensure the best possible results.

### Family Information

**Are you interested in scholarships and grants based on financial need?**

Yes  No

### Family/Parental Income

None Selected

**Are you a parent conducting this scholarship search for your child?**

required  
 Yes  No

### Military Veteran Affiliation or Interest

Do you (or does a member of your family) have an affiliation with or interest in the military?

Yes  No

### Parent Resident State (if different from student's resident state)

State (U.S. Territories)

(None Selected)

### Parent or Student Employer/Occupation Information (select all that apply)

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> A&W                                     | <input type="checkbox"/> Haggart Corporation                      | <input type="checkbox"/> Public Service Employee                     |
| <input type="checkbox"/> Abbott Laboratories                     | <input type="checkbox"/> Jamison Research                         | <input type="checkbox"/> Roller Skating Association                  |
| <input type="checkbox"/> Air Line Employee                       | <input type="checkbox"/> Kentucky Fried Chicken                   | <input type="checkbox"/> Russell Corporation                         |
| <input type="checkbox"/> Alabama Power                           | <input type="checkbox"/> Law Enforcement (Police) Officer         | <input type="checkbox"/> Servco - HI                                 |
| <input type="checkbox"/> Alcoa                                   | <input type="checkbox"/> Long John Silvers                        | <input type="checkbox"/> Sheet Metal Workers Local 137               |
| <input type="checkbox"/> alltel                                  | <input type="checkbox"/> Lowe's                                   | <input type="checkbox"/> Subway Restaurant                           |
| <input type="checkbox"/> Butler Manufacturing Company            | <input type="checkbox"/> McDonald's Corporation                   | <input type="checkbox"/> Table Grape Field Worker                    |
| <input type="checkbox"/> California Grape Grower                 | <input type="checkbox"/> Meijer                                   | <input type="checkbox"/> Taco Bell                                   |
| <input type="checkbox"/> California State University Bakersfield | <input type="checkbox"/> NA                                       | <input type="checkbox"/> Travel Industry                             |
| <input type="checkbox"/> Community Bankers Assoc. of Illinois    | <input type="checkbox"/> National Roofing Contractors Association | <input type="checkbox"/> Tree Top, Inc. Employee                     |
| <input type="checkbox"/> Emergency Medical Technician (EMT)      | <input type="checkbox"/> Nebraska Petroleum Marketer              | <input type="checkbox"/> Vermont Grocers Association Member Business |
| <input type="checkbox"/> Firefighter                             | <input type="checkbox"/> Pattillo Construction Corporation        | <input type="checkbox"/> Wakefield Healthcare Center                 |
| <input type="checkbox"/> Food Service Professional               | <input type="checkbox"/> Pizza Hut                                | <input type="checkbox"/> Wal-Mart                                    |
| <input type="checkbox"/> Footwear & Leather Industry             | <input type="checkbox"/> Prison Guard                             | <input type="checkbox"/> West Company                                |
| <input type="checkbox"/> Golf Caddie                             | <input type="checkbox"/> Promotional Products Industry            | <input type="checkbox"/> Yum!  |

### Interests/Groups/Attributes (select all that apply)

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Adopted/Foster Child/Orphan              | <input type="checkbox"/> English As A Second Language                           | <input type="checkbox"/> Political Party Activist- Democrat      |
| <input type="checkbox"/> Affected by Sept. 11th Attacks           | <input type="checkbox"/> Environmental Activism                                 | <input type="checkbox"/> Political Party Activist- Republican    |
| <input type="checkbox"/> Against The Death Penalty                | <input type="checkbox"/> Farmer   | <input type="checkbox"/> Public Assistance Recipient             |
| <input type="checkbox"/> Alcohol Addiction/Recovery               | <input type="checkbox"/> Feminist   | <input type="checkbox"/> Public Housing Resident                 |
| <input type="checkbox"/> Animal/Pet Care Experience               | <input type="checkbox"/> First In Family / First Generation College Student     | <input type="checkbox"/> Recovering From Alcohol/Substance Abuse |
| <input type="checkbox"/> Bilingual                                | <input type="checkbox"/> Google Scholarships                                    | <input type="checkbox"/> Refugee/Immigrant                       |
| <input type="checkbox"/> Birth Mother Placed a Child for Adoption | <input type="checkbox"/> Greek/Hellenic Heritage                                | <input type="checkbox"/> Returning/Continuing Student            |
| <input type="checkbox"/> Canadian Citizen                         | <input type="checkbox"/> Head of Household                                      | <input type="checkbox"/> Single Parent                           |
| <input type="checkbox"/> Cancer Patient/Survivor (or Child of)    | <input type="checkbox"/> Left-Handed People                                     | <input type="checkbox"/> Social Action                           |
| <input type="checkbox"/> Child of Illegal Immigrant               | <input type="checkbox"/> Lesbian/Gay/Bisexual/Transgender (LGBT) or Parent LGBT | <input type="checkbox"/> Study Abroad                            |
| <input type="checkbox"/> Child of Single Parent                   | <input type="checkbox"/> Little People  | <input type="checkbox"/> Tall People                             |
| <input type="checkbox"/> Community Service                        | <input type="checkbox"/> Migrant Worker/Child of Migrant Worker                 | <input type="checkbox"/> Transfer Students                       |
| <input type="checkbox"/> Displaced Homemaker                      | <input type="checkbox"/> Multiple Birth Sibling (twins, triplets, etc.)         | <input type="checkbox"/> Transgender                             |
| <input type="checkbox"/> Domestic Abuse Victim                    | <input type="checkbox"/> Orphan   | <input type="checkbox"/> Transplant Candidate/Recipient          |

### Scholarships in 6 Easy Steps: (Use to navigate between sections)

- Student Information
- College Choices
- Academic Information
- Artistic/Athletic Information
- Background Information**
- Organization Information

*Scholarships.com was the most frequent tool I used in my scholarship search. It had the most interactive interface, it provided the most reliable links for the most prominent scholarships I applied for, and it also sent e-mail notifications for deadlines and for new scholarships that fit my profile.*

**- Derrius Q.**



*Derrius was awarded over \$1,000,000 in scholarships, earning him the nickname "The Million Dollar Scholar".*

*Thanks to Scholarships.com, I haven't had to pay a cent for my entire college education. I've collected a wealth of scholarships ranging from \$500 to \$10,000.*

**- Diane M.**



*Among many others, Diane was awarded a scholarship from the Marine Corps for \$8,400 and a Girl Friends Inc. Women's Excellence Award in the amount of \$6,000.*

[Send Us Your Success Story](#)

- Domestic Abuse victim
- Drug Addiction/Recovery/Conviction
- Duck Calling

- Overweight Acceptance Supporter
- Parent of Multiples (twins, triplets, etc.)
- Parent, Student with dependent children

- Transplant Candidate/Recipient
- Twins/Triplets
- Vegetarian/Vegan

### Concordia Univervisty Online

#### Online Learning at Concordia University

Concordia University - Portland online offers one year Master of Education programs that can help you take the next step in your career. Our accelerated online classes are five weeks in length and are designed to help you develop new strategies for your classroom in addition to expanding your knowledge as an educator. Through our program format, you will not only study and grow with student peers just like yourself, but you will be able to do so in the comfort of your own home and at your convenience. Concordia University - Portland online is dedicated to providing its students with the tools necessary to enhance individual teaching and leadership skills, as well as promote an inclusive learning environment that fosters discussion and stimulates intellectual rigor. Scholarships, grants and other forms of financial aid may also be available to help students with their tuition. To find out if you qualify and to learn more about our programs, simply submit your information now.



#### Why choose Concordia University?

Concordia University's Online Programs Can Help You:

- ▶ Get your master's degree in **one year**
- ▶ Further your education **on your schedule**, from the comfort of **your home**
- ▶ A master's degree could mean a salary increase in your school district
- ▶ Use research-based best practices to have a more powerful **impact on education**
- ▶ Further your education through affordable **financial aid** and **competitive tuition**

#### Accreditation:

Concordia University is accredited by the Northwest Commission on Colleges and Universities, is affiliated with the Lutheran Church-Missouri Synod, and is a member of the Concordia University System.

#### Request Free Information:

With a degree from Concordia University - Portland online, you will learn to develop your leadership role in the classroom, school, community and profession as a whole. Complete this form now to learn more about our online degrees.

By submitting this form, you are giving your express written consent to be called by or on behalf of Concordia University - Portland regarding our educational programs and services using email, telephone or text-including our use of an automatic telephone dialing system for calls or texts to any wireless number provided. This consent is not required to purchase services or enroll in any programs.

Degree of Interest

Phone Number (  )

Alternate Phone Number (  )

Best time to call you?

What is your highest level of education?

What was your undergraduate GPA??

When do you plan to enroll?

- Please have a Concordia Univeristy Online representative contact me with more information.
- No, thank you.

Concordia Univervisty Online cannot guarantee employment or salary. Scholarships, grants, and other forms of financial aid may be available to help students with their tuition. To find out if you qualify, simply submit your information, and one of our enrollment specialists will contact you shortly.

#### Join the Harris Poll Online.

##### Take Surveys. Earn Stuff. It's That Simple.

As an HPOL member, you'll earn HIpoinTs rewards, which will quickly mount up to enough for cool stuff on such sites as Amazon, iTunes, iCard and Restaurant.com.

Plus with every survey you complete you have a chance to enter our \$10,000 sweepstakes! This is one place where you'll always feel like a VIP. Let us show you.

- Yes, Sign me up!
- No, thank you.



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# **Exhibit G**

## **Scholarships.com Privacy Policy**



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## Privacy Policy

Scholarships.com recognizes that your privacy is important. To demonstrate our firm commitment to your privacy and to explain the types of information we obtain about visitors to our website, how that information is obtained and used, and how visitors can restrict its use or disclosure, we have created the Privacy Policy below. The following discusses our information gathering and dissemination practices at Scholarships.com.



## Information We Receive and How It Is Used

All personal information obtained by Scholarships.com about individual visitors to our website is information supplied voluntarily by that visitor. During registration, a user is required to provide certain categories of information, such as name, address, email address, phone number, a password, date of birth, gender and country of citizenship. In addition, a user may choose to provide other categories of information, such as career objectives, health or disability information, hobbies and other interests. Scholarships.com encourages its users to provide all of these fields of information so that users may maximize the effectiveness of the scholarship and college search. We ask if we may make that information available to our select list of marketing partners, which are reputable companies and organizations that provide products and services of interest to students and parents. Our users choose whether to opt-in or opt-out of sharing their information with these partners.

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# **Exhibit I**

## **American Student Marketing Homepage**



Communicate with  
**College Graduates...**



[counts@asmdm.com](mailto:counts@asmdm.com) | 847.432.4329 x113

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## America's #1 Source for Reaching the Ideal Audience

Millions of students and young adults have made a choice.

They have expressed a desire for targeted offers, based on the information they volunteered.

As the exclusive manager of the Scholarships.com file, the source of the opt-in and always current, we are proud to offer this reliable and high quality file, making sure that they get what they want and receive offers likely to appeal to them and aid them, in school and beyond.

**American Student Marketing** makes sure that users of Scholarships.com get only the messages that fit them, wasting neither their time nor those interested in marketing to them. This file is comprised of youth and young adult data composed only of 100% self-reported information from students and parents searching for college and financial aid information. This expansive file contains user data, volunteered by the user and verified at the source, available online to provide access to highly-specific and current demographic information.

[DOWNLOAD RATE CARD](#)

Reach Out to Your Ideal Audience:

- [College Bound Students](#)
- [High School Students](#)
- [College Students](#)
- [College Graduates](#)
- [Graduate School Students](#)
- [African American](#)
- [Asian American](#)
- [Baby Boomers](#)
- [Families with Children](#)
- [Generation X](#)
- [Hispanic American](#)
- [LGBT](#)
- [Millennial/Generation Y](#)
- [Multicultural Youth](#)
- [Native American](#)
- [Young Professionals](#)

Data Exclusively Provided By:



We offer various ways to custom-tailor marketing efforts to ensure ideal fit and engagement. Select your list by age, ethnicity, academic major, recreational interests, etc. Whatever you feel is necessary to reach the student, young professional or parent you desire.

## **Exhibit J**

# **American Student Marketing Data Select Sample Query**



Ke

This is a sample page.  
For counts, please call 847-432-4329 x113  
or email counts@asmdm.com



Segments

Request Information

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## Data Query

Enter your criteria and click "Get Counts" to see how many names match your criteria.

Postal Counts

Email Counts

Get Counts

Reset Form

Grouping: No Grouping

Send copy of counts to:

(Seperate multiple email addresses with commas)

Description: General Counts

Market Prospectus Factor:

### Current School Year

Select All

HS Grad 2016

HS Grad 2015

HS Grad 2014

HS Grad 2013

Grad School Graduate 2002

Grad School Graduate 2005

Grad School Graduate 2008

Grad School Graduate 2012

COL Graduate 2002

COL Graduate 2005

COL Graduate 2008

COL Graduate 2011

Trade/Technical/Home School/GED

COL Grad 2016

COL Grad 2015

COL Grad 2014

COL Grad 2013

Grad School Graduate 2003

Grad School Graduate 2006

Grad School Graduate 2009

Grad School Graduate 2011

COL Graduate 2003

COL Graduate 2006

COL Graduate 2009

COL Graduate 2012

Grad SCH 1st year

Grad SCH 2nd year

Grad SCH 3rd year

Grad SCH 4th year

Grad School Graduate 2004

Grad School Graduate 2007

Grad School Graduate 2010

COL Graduate 2001

COL Graduate 2004

COL Graduate 2007

COL Graduate 2010

Not Currently Enrolled/Non-Traditional

### Phone Number

Only Return Records With Complete Phone Numebrs.

### Age

Age Between  and

**Gender**

(INCLUDE ALL) ▾

**Parent Completing Profile For Child**

(INCLUDE ALL) ▾

**College Identifier**

NOTE: Leading 0's will automatically be added for you. 6 digit OPEIDs will result in counts at the school level. 8 digit OPEIDs will produce counts at the campus level, however, most colleges in our database do not have campus level OPEIDs.

- 6 Digit ID
- 8 Digit ID

**Zip Code / SCF**

Zip Code Between  and

-OR-

Zip Code/SCF List (Please Note: ZIP codes must be five digits SCFs must be three digits and appear one per line)

-OR-

Within  Miles Of Zip Code List (Please Note: ZIP codes must be five digits and appear one per line)

**GPA**

GPA Between  And

**Class Rank**

(INCLUDE ALL) ▾ % (ie. 10% means top 10% of class)

**Standardized Test Scores**

Minimum ACT Score (INCLUDE ALL) ▾

Minimum SAT Score (INCLUDE ALL) ▾

Min. GED Score (INCLUDE ALL) ▾

Min. GED Rank (INCLUDE ALL) ▾ % (10% means top 10% of class)

**Marital Status**

Single

Married

Divorced

Widowed

## U.S. Citizen

Yes  No

## Military Veteran Status

Yes  No

## Hotline

Days - or - Visit Date Between:  and

## Academic Level of Institution

2 - Year/Associate/Certificate  4 - Year

## Historically Black Colleges And Universities

HBCU

## Academic Major

NOTE: Academic Major, Artistic Ability and Athletic Ability are special cases and are ORed against each other. All other criteria ia ANDED. Also, if grouping is selected for these categories, records may be counted multiple times since 1 user can selected multiple items in each of these categories. The count will represent the total number of users selecting each category and not the unique count of records. To get the unique count of records run your query without grouping options.

**Select All**  
 **All Engineering**  
 **All Arts**  
 **All Medical**

**All Business**  
 **All Computer Science**  
 **All Education**  
 **Pre-Med Majors**

**All Accounting**  
 **All Science**  
 **All Humanities**

Accounting  
 Actuarial Science  
 Administrative Assistant  
 Advertising  
 Aerospace Technologies  
 Agriculture/Agribusiness  
 Air Conditioning  
 Airline Travel  
 Alaskan Native Studies  
 Allopathic  
 Ambulatory Health Care  
 Animal Husbandry  
 Animal Science/Dairy  
 Anthropology  
 Applied Science  
 Archaeology  
 Architecture  
 Art  
 Art History  
 Asian Studies  
 Astronomy  
 Audiology  
 Automotive Technologies  
 Aviation  
 Aviation/Aircraft Technology  
 Biology  
 Biomedicine  
 Botany  
 Broadcasting

Fire Protection Engineering  
 Firefighting  
 Fishery Science/Management  
 Food Science/Food Industry  
 Foreign Languages/Cultures  
 Forensics (medical)  
 Forestry/Natural Resources  
 Funeral Services/Mortuary  
 Genealogy  
 Genetics  
 Geography/Area Studies  
 Geological Sciences  
 Geophysics  
 Government  
 Graphic Design  
 Health Care Administration  
 Health Education  
 History  
 Horticulture/Floriculture  
 Hotel/Restaurant Management  
 Human Resources  
 Human Services  
 Humanities/Social Sciences  
 Information Systems Engineering  
 Information Technology  
 Insurance  
 Interior Design  
 Internal Medicine  
 International Affairs

Oncology  
 Ophthalmology  
 Optics  
 Optometry  
 Oral Radiology  
 Ornithology  
 Orthopedics  
 Orthotics/Prosthetics  
 Osteopathic  
 Packaging Technologies  
 Paralegal  
 Park & Recreation Management  
 Pediatrics  
 Pharmacology  
 Pharmacy Technician  
 Philosophy  
 Photogrammetry  
 Photographic Studies  
 Physical Education  
 Physical Therapy/Rehabilitation  
 Physician Assistant  
 Physics  
 Physiology  
 Plastics  
 Plumbing/Heating/Cooling  
 Podiatry  
 Political Science  
 Polymer Technology  
 Primary Care

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Business                       | <input type="checkbox"/> International Business             | <input type="checkbox"/> Private Investigator          |
| <input type="checkbox"/> Business Administration        | <input type="checkbox"/> Journalism                         | <input type="checkbox"/> Psychiatry                    |
| <input type="checkbox"/> Cartography                    | <input type="checkbox"/> Justice/Legal Studies              | <input type="checkbox"/> Psychology/Counseling         |
| <input type="checkbox"/> Chemical Engineering           | <input type="checkbox"/> Landscape Architecture             | <input type="checkbox"/> Public Administration         |
| <input type="checkbox"/> Chemistry                      | <input type="checkbox"/> Law                                | <input type="checkbox"/> Public Health                 |
| <input type="checkbox"/> Child Care/Education           | <input type="checkbox"/> Law Enforcement                    | <input type="checkbox"/> Public Relations              |
| <input type="checkbox"/> Chiropractic                   | <input type="checkbox"/> Liberal Arts                       | <input type="checkbox"/> Public Service                |
| <input type="checkbox"/> Civil Engineering              | <input type="checkbox"/> Library Sciences                   | <input type="checkbox"/> Pulp & Paper Science          |
| <input type="checkbox"/> Commercial Arts                | <input type="checkbox"/> Lighting Technologies              | <input type="checkbox"/> Pulp/Paper Industry           |
| <input type="checkbox"/> Communication Sciences         | <input type="checkbox"/> Linguistics                        | <input type="checkbox"/> Radiology                     |
| <input type="checkbox"/> Communications                 | <input type="checkbox"/> Literature                         | <input type="checkbox"/> Railway Engineering           |
| <input type="checkbox"/> Computer Science               | <input type="checkbox"/> Maintenance Technician             | <input type="checkbox"/> Range/Land Management         |
| <input type="checkbox"/> Computer Technology            | <input type="checkbox"/> Management                         | <input type="checkbox"/> Real Estate/Development       |
| <input type="checkbox"/> Concrete Engineering           | <input type="checkbox"/> Manufacturing                      | <input type="checkbox"/> Religious Studies             |
| <input type="checkbox"/> Construction                   | <input type="checkbox"/> Marine Science                     | <input type="checkbox"/> Respiratory Care              |
| <input type="checkbox"/> Cosmetology                    | <input type="checkbox"/> Marketing/Distribution             | <input type="checkbox"/> Retail                        |
| <input type="checkbox"/> Criminal Justice               | <input type="checkbox"/> Massage Therapy                    | <input type="checkbox"/> Satellite Imagery             |
| <input type="checkbox"/> Crystallography                | <input type="checkbox"/> Mathematics                        | <input type="checkbox"/> Science (General)             |
| <input type="checkbox"/> Culinary Arts                  | <input type="checkbox"/> Maxillofacial Radiology            | <input type="checkbox"/> Science (Health)              |
| <input type="checkbox"/> Dance                          | <input type="checkbox"/> Mechanical Engineering             | <input type="checkbox"/> Science (Social)              |
| <input type="checkbox"/> Debate                         | <input type="checkbox"/> Mechanical/Electrical Technologies | <input type="checkbox"/> Secretarial                   |
| <input type="checkbox"/> Dental Assistant               | <input type="checkbox"/> Medical Assistant                  | <input type="checkbox"/> Social Worker                 |
| <input type="checkbox"/> Dentistry                      | <input type="checkbox"/> Medical Lab Technician             | <input type="checkbox"/> Sociology                     |
| <input type="checkbox"/> Design                         | <input type="checkbox"/> Medical Office Specialist          | <input type="checkbox"/> Spanish                       |
| <input type="checkbox"/> Drafting/Computer Aided Design | <input type="checkbox"/> Medical Technologist               | <input type="checkbox"/> Special Education             |
| <input type="checkbox"/> Earth Sciences                 | <input type="checkbox"/> Medicine                           | <input type="checkbox"/> Speech/Language Pathology     |
| <input type="checkbox"/> Ecology                        | <input type="checkbox"/> Metallurgy                         | <input type="checkbox"/> Sports Administration         |
| <input type="checkbox"/> Economics                      | <input type="checkbox"/> Meteorological Sciences            | <input type="checkbox"/> Sports Medicine               |
| <input type="checkbox"/> Education                      | <input type="checkbox"/> Microbiology                       | <input type="checkbox"/> Surveying                     |
| <input type="checkbox"/> Electrical Engineering         | <input type="checkbox"/> Military Sciences                  | <input type="checkbox"/> Telecommunications            |
| <input type="checkbox"/> Electronics                    | <input type="checkbox"/> Mineralogy                         | <input type="checkbox"/> Television                    |
| <input type="checkbox"/> Emergency Services             | <input type="checkbox"/> Mining Engineering                 | <input type="checkbox"/> Theatre                       |
| <input type="checkbox"/> Engineering                    | <input type="checkbox"/> Molecular Genetics                 | <input type="checkbox"/> Theology                      |
| <input type="checkbox"/> Engineering Management         | <input type="checkbox"/> Museum Studies                     | <input type="checkbox"/> Therapeutic Health Technician |
| <input type="checkbox"/> English                        | <input type="checkbox"/> Music                              | <input type="checkbox"/> Transportation Technologies   |
| <input type="checkbox"/> Enology                        | <input type="checkbox"/> Music Education                    | <input type="checkbox"/> Travel & Tourism              |
| <input type="checkbox"/> Entomology                     | <input type="checkbox"/> Natural History                    | <input type="checkbox"/> TV News Photojournalism       |
| <input type="checkbox"/> Entrepreneurship               | <input type="checkbox"/> Natural Resources Technologies     | <input type="checkbox"/> Veterinary                    |
| <input type="checkbox"/> Environmental Engineering      | <input type="checkbox"/> Natural Sciences                   | <input type="checkbox"/> Vision Rehabilitation         |
| <input type="checkbox"/> Environmental Health           | <input type="checkbox"/> Neural and Behavioral Science      | <input type="checkbox"/> Viticulture                   |
| <input type="checkbox"/> Environmental Science          | <input type="checkbox"/> Neurosciences                      | <input type="checkbox"/> Vocational Careers            |
| <input type="checkbox"/> Environmental Studies          | <input type="checkbox"/> New Media                          | <input type="checkbox"/> Voice                         |
| <input type="checkbox"/> Estuarine Science              | <input type="checkbox"/> Nuclear Sciences                   | <input type="checkbox"/> Water and Soil Conservation   |
| <input type="checkbox"/> Family & Consumer Sciences     | <input type="checkbox"/> Nursing/Nurse Practitioner         | <input type="checkbox"/> Web Design                    |
| <input type="checkbox"/> Family Practice                | <input type="checkbox"/> Nutrition Studies                  | <input type="checkbox"/> Welding                       |
| <input type="checkbox"/> Fashion                        | <input type="checkbox"/> Obstetrics/Gynecology              | <input type="checkbox"/> Women's Studies               |
| <input type="checkbox"/> Film Studies                   | <input type="checkbox"/> Occupational Safety                | <input type="checkbox"/> X-Ray Technician              |
| <input type="checkbox"/> Finance                        | <input type="checkbox"/> Occupational Therapy               | <input type="checkbox"/> Zoology                       |
| <input type="checkbox"/> Fine Arts                      | <input type="checkbox"/> Oceanography                       |  |

## Artistic Ability/Interest

**Select All**

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Art (General)               | <input type="checkbox"/> Art - Papermaking    | <input type="checkbox"/> Music - Performance   |
| <input type="checkbox"/> Art - Crafts                | <input type="checkbox"/> Art - Photography    | <input type="checkbox"/> Music - Theory        |
| <input type="checkbox"/> Art - Dance                 | <input type="checkbox"/> Art - Printmaking    | <input type="checkbox"/> Music - Vocal         |
| <input type="checkbox"/> Art - Design                | <input type="checkbox"/> Art - Sculpture      | <input type="checkbox"/> Theater (General)     |
| <input type="checkbox"/> Art - Drawing               | <input type="checkbox"/> Art - Video          | <input type="checkbox"/> Theater - Design      |
| <input type="checkbox"/> Art - Film Making           | <input type="checkbox"/> Art - Visual Arts    | <input type="checkbox"/> Theater - Musical     |
| <input type="checkbox"/> Art - Furnishing and Design | <input type="checkbox"/> Music (General)      | <input type="checkbox"/> Theater - Performance |
| <input type="checkbox"/> Art - Literary Composition  | <input type="checkbox"/> Music - Composition  | <input type="checkbox"/> Theater - Playwriting |
| <input type="checkbox"/> Art - Painting              | <input type="checkbox"/> Music - Instrumental | <input type="checkbox"/> Theater - Production  |

## Athletic Ability/Interest

**Select All**



- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Any Sport             | <input type="checkbox"/> Figure Skating  | <input type="checkbox"/> Skateboarding               |
| <input type="checkbox"/> Archery               | <input type="checkbox"/> Football        | <input type="checkbox"/> Skiing                      |
| <input type="checkbox"/> Baseball/Softball     | <input type="checkbox"/> Golf            | <input type="checkbox"/> Soccer                      |
| <input type="checkbox"/> Basketball            | <input type="checkbox"/> Gymnastics      | <input type="checkbox"/> Strength Conditioning       |
| <input type="checkbox"/> Billiards             | <input type="checkbox"/> Harness Racing  | <input type="checkbox"/> Surfing                     |
| <input type="checkbox"/> Bodybuilding          | <input type="checkbox"/> Ice Hockey      | <input type="checkbox"/> Swimming/Diving             |
| <input type="checkbox"/> Bowling               | <input type="checkbox"/> In-Line Skating | <input type="checkbox"/> Tennis/Racquet Sports       |
| <input type="checkbox"/> Boxing                | <input type="checkbox"/> Lacrosse        | <input type="checkbox"/> Track & Field/Cross Country |
| <input type="checkbox"/> Cheerleading          | <input type="checkbox"/> Martial Arts    | <input type="checkbox"/> Volleyball                  |
| <input type="checkbox"/> Equestrian/Polo/Rodeo | <input type="checkbox"/> Rugby           | <input type="checkbox"/> Water Polo                  |
| <input type="checkbox"/> Field Hockey          | <input type="checkbox"/> Sailing/Rowing  | <input type="checkbox"/> Wrestling                   |

## Ethnicity

 **Select All**

- |   |                                    |   |
|---|------------------------------------|---|
| <input type="checkbox"/> African American       | <input type="checkbox"/> Caucasian | <input type="checkbox"/> Native American              |
| <input type="checkbox"/> Alaska Native          | <input type="checkbox"/> Hispanic  | <input type="checkbox"/> Other Ethnic/Racial Heritage |
| <input type="checkbox"/> Asian/Pacific Islander |                                    |   |

## Resides in

 **Select All**

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Alabama - AL                        | <input type="checkbox"/> Iowa - IA             | <input type="checkbox"/> North Dakota - ND             |
| <input type="checkbox"/> Alaska - AK                         | <input type="checkbox"/> Kansas - KS           | <input type="checkbox"/> Northern Mariana Islands - MP |
| <input type="checkbox"/> American Samoa - AS                 | <input type="checkbox"/> Kentucky - KY         | <input type="checkbox"/> Ohio - OH                     |
| <input type="checkbox"/> Arizona - AZ                        | <input type="checkbox"/> Louisiana - LA        | <input type="checkbox"/> Oklahoma - OK                 |
| <input type="checkbox"/> Arkansas - AR                       | <input type="checkbox"/> Maine - ME            | <input type="checkbox"/> Oregon - OR                   |
| <input type="checkbox"/> Armed Forces Americas - AA          | <input type="checkbox"/> Marshall Islands - MH | <input type="checkbox"/> Pennsylvania - PA             |
| <input type="checkbox"/> Armed Forces Europe - AE            | <input type="checkbox"/> Maryland - MD         | <input type="checkbox"/> Puerto Rico - PR              |
| <input type="checkbox"/> Armed Forces Pacific - AP           | <input type="checkbox"/> Massachusetts - MA    | <input type="checkbox"/> Rhode Island - RI             |
| <input type="checkbox"/> California - CA                     | <input type="checkbox"/> Michigan - MI         | <input type="checkbox"/> South Carolina - SC           |
| <input type="checkbox"/> Colorado - CO                       | <input type="checkbox"/> Minnesota - MN        | <input type="checkbox"/> South Dakota - SD             |
| <input type="checkbox"/> Connecticut - CT                    | <input type="checkbox"/> Mississippi - MS      | <input type="checkbox"/> Tennessee - TN                |
| <input type="checkbox"/> Delaware - DE                       | <input type="checkbox"/> Missouri - MO         | <input type="checkbox"/> Texas - TX                    |
| <input type="checkbox"/> District of Columbia - DC           | <input type="checkbox"/> Montana - MT          | <input type="checkbox"/> Utah - UT                     |
| <input type="checkbox"/> Federated States of Micronesia - FM | <input type="checkbox"/> Nebraska - NE         | <input type="checkbox"/> Vermont - VT                  |
| <input type="checkbox"/> Florida - FL                        | <input type="checkbox"/> Nevada - NV           | <input type="checkbox"/> Virgin Islands, U.S. - VI     |
| <input type="checkbox"/> Georgia - GA                        | <input type="checkbox"/> New Hampshire - NH    | <input type="checkbox"/> Virginia - VA                 |
| <input type="checkbox"/> Guam - GU                           | <input type="checkbox"/> New Jersey - NJ       | <input type="checkbox"/> Washington - WA               |
| <input type="checkbox"/> Hawaii - HI                         | <input type="checkbox"/> New Mexico - NM       | <input type="checkbox"/> West Virginia - WV            |
| <input type="checkbox"/> Idaho - ID                          | <input type="checkbox"/> New York - NY         | <input type="checkbox"/> Wisconsin - WI                |
| <input type="checkbox"/> Illinois - IL                       | <input type="checkbox"/> North Carolina - NC   | <input type="checkbox"/> Wyoming - WY                  |
| <input type="checkbox"/> Indiana - IN                        |  |  |

## Disabilities

 **Select All**

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> ADD/ADHD                 | <input type="checkbox"/> Dyslexia                  | <input type="checkbox"/> Mental Impairment                   |
| <input type="checkbox"/> Allergies                | <input type="checkbox"/> Epilepsy                  | <input type="checkbox"/> Phenylketonuria (PKU)               |
| <input type="checkbox"/> Any Impairment           | <input type="checkbox"/> Glycogen Storage Disease  | <input type="checkbox"/> Physical Impairment                 |
| <input type="checkbox"/> Arthritis/Rheumatism     | <input type="checkbox"/> Hearing Impaired Parent   | <input type="checkbox"/> Primary Immune Deficiency           |
| <input type="checkbox"/> Cancer Related           | <input type="checkbox"/> Hearing Impairment        | <input type="checkbox"/> Relative w/ Alzheimer's             |
| <input type="checkbox"/> Clinically Depressed     | <input type="checkbox"/> Hemophilia                | <input type="checkbox"/> Respiratory Impairment              |
| <input type="checkbox"/> Clinically Overweight    | <input type="checkbox"/> Hepatitis                 | <input type="checkbox"/> Sickle Cell Disease                 |
| <input type="checkbox"/> Developmental Impairment | <input type="checkbox"/> Kidney Related Impairment | <input type="checkbox"/> Spina Bifida                        |
| <input type="checkbox"/> Digestive Impairment     | <input type="checkbox"/> Learning Disability       | <input type="checkbox"/> Visual Impairment                   |
| <input type="checkbox"/> Disabled Parent          | <input type="checkbox"/> Medical Disability        | <input type="checkbox"/> Wheelchair User/Mobility Challenged |

## Honor Organization

 **Select All**

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Academic Honors Program                                | <input type="checkbox"/> Horatio Alger Association National Winner/Runner-Up             | <input type="checkbox"/> National Society of Collegiate Scholars                |
| <input type="checkbox"/> ACTEEN Award   | <input type="checkbox"/> Hugh O'Brian Youth Ambassador (H.O.B.Y.)                        | <input type="checkbox"/> National Society of High School Scholars               |
| <input type="checkbox"/> All - American Sports                                  | <input type="checkbox"/> International Competition for Student Artists                   | <input type="checkbox"/> Order of Omega   |
| <input type="checkbox"/> All - Conference Sports                                | <input type="checkbox"/> Kentucky Governor's Scholar                                     | <input type="checkbox"/> Phi Sigma Theta  |
| <input type="checkbox"/> All - District Sports                                  | <input type="checkbox"/> LeGrand Concours National Winner                                | <input type="checkbox"/> Phi Theta Kappa  |
| <input type="checkbox"/> Arts Recognition & Talent Search Finalist              | <input type="checkbox"/> Mortar Board  | <input type="checkbox"/> Presidential Scholar                                   |
| <input type="checkbox"/> Baush & Lomb Science Award                             | <input type="checkbox"/> National Achievement Award                                      | <input type="checkbox"/> Quill & Scroll Society                                 |
| <input type="checkbox"/> Beta Club  | <input type="checkbox"/> National Achievement Scholarship for Outstanding Negro Students | <input type="checkbox"/> Scholastic Nominee                                     |
| <input type="checkbox"/> Boys State Conference Delegate                         | <input type="checkbox"/> National Achievement Semi-Finalist/Finalist                     | <input type="checkbox"/> State Honors Program                                   |
| <input type="checkbox"/> Congressional Art Competition for High School Students | <input type="checkbox"/> National Art Honors   | <input type="checkbox"/> Student Academy Awards (Regional or National Finalist) |
| <input type="checkbox"/> Dean's List  | <input type="checkbox"/> National Hispanic Achievement Award                             | <input type="checkbox"/> TRI-M Music Honor Society                              |
| <input type="checkbox"/> Girl Scout Gold Award                                  | <input type="checkbox"/> National Hispanic Scholarship Semi-Finalist/Finalist            | <input type="checkbox"/> United Federation of Teachers Scholarship Recipient    |
| <input type="checkbox"/> Girls State Conference Delegate                        | <input type="checkbox"/> National Honor Society  | <input type="checkbox"/> Valedictorian/Salutatorian                             |
| <input type="checkbox"/> Golden Key National Honor Society                      | <input type="checkbox"/> National Merit Finalist & Semi-Finalist                         | <input type="checkbox"/> VICA-Vocational Industrial Clubs of America            |
| <input type="checkbox"/> High Honors Program                                    | <input type="checkbox"/> National Merit Recognition                                      | <input type="checkbox"/> Vocational Gold Seal Endorsement                       |
| <input type="checkbox"/> Honors Program   | <input type="checkbox"/> National or State Debate Champion                               | <input type="checkbox"/> Western Regional Honors Council                        |

## Organizations

### Select All

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> 4-H  | <input type="checkbox"/> Disabled American Veterans Auxiliary            | <input type="checkbox"/> NGAI   |
| <input type="checkbox"/> AAEE   | <input type="checkbox"/> Distributive Education Clubs of America (DECA)  | <input type="checkbox"/> Ninety-Nines, Inc.-International Women Pilots                        |
| <input type="checkbox"/> AANR West  | <input type="checkbox"/> Dixie Youth Baseball                            | <input type="checkbox"/> Non-Commissioned Officers Association of the USA (NCOA)              |
| <input type="checkbox"/> Acacia   | <input type="checkbox"/> Dramatic Society Member                         | <input type="checkbox"/> NOW Foundation (National Organization For Women)                     |
| <input type="checkbox"/> Accounting Club  | <input type="checkbox"/> ELCA  | <input type="checkbox"/> NSDAR - National Society of the Daughters of the American Revolution |
| <input type="checkbox"/> ACJA/LAE   | <input type="checkbox"/> Elks National Foundation                        | <input type="checkbox"/> NSNA - National Student Nurses Association                           |
| <input type="checkbox"/> Acteen Member  | <input type="checkbox"/> Emergency Nurses Association                    | <input type="checkbox"/> NSSAR - The National Society Sons of the American Revolution         |
| <input type="checkbox"/> AER - Association for Education and Rehabilitation of the Blind and Visually Imp | <input type="checkbox"/> Ensemble Member                                 | <input type="checkbox"/> NSSLA  |
| <input type="checkbox"/> Aero Club  | <input type="checkbox"/> Epsilon Upsilon                                 | <input type="checkbox"/> Nursing Students Association   |
| <input type="checkbox"/> AFL-CIO  | <input type="checkbox"/> Eta Kappa Nu                                    | <input type="checkbox"/> Oklahoma Cattlemen's Association                                     |
| <input type="checkbox"/> AFSA - American Foreign Service Association                                      | <input type="checkbox"/> Euclidean Mathematics Club                      | <input type="checkbox"/> Omega Psi Phi Fraternity   |
| <input type="checkbox"/> AFSCME-American Federation of State, County & Municipal Employees                | <input type="checkbox"/> Family, Career and Community Leaders of America | <input type="checkbox"/> Omicron Delta Kappa  |
| <input type="checkbox"/> AHIMA-American Health Information Management Association                         | <input type="checkbox"/> Farm Bureau                                     | <input type="checkbox"/> OPEU - Oregon Public Employees Union                                 |
| <input type="checkbox"/> AICPA  | <input type="checkbox"/> Farm Bureau Member                              | <input type="checkbox"/> Optometric Association   |
| <input type="checkbox"/> Aid Association for Lutherans  | <input type="checkbox"/> Farm Credit Service                             | <input type="checkbox"/> Orchestra, Student Member  |
| <input type="checkbox"/> Air Line Pilots Association  | <input type="checkbox"/> Farmland System Cooperative                     | <input type="checkbox"/> Order of Daedalians  |
| <input type="checkbox"/> Alabama Golf Course Superintendents Association                                  | <input type="checkbox"/> Federally Employed Women                        | <input type="checkbox"/> Order of The Eastern Star  |
| <input type="checkbox"/> Alcohol & Drug Recovery Program - Participant                                    | <input type="checkbox"/> Federation of American Consumers and Travelers  | <input type="checkbox"/> Oregon Credit Union League   |
| <input type="checkbox"/> Alpha Beta Gamma   | <input type="checkbox"/> Fellowship of Christian Athletes                | <input type="checkbox"/> PAAC   |
| <input type="checkbox"/> Alpha Chi Omega  | <input type="checkbox"/> FFA-Future Farmers of America                   | <input type="checkbox"/> Panhellenic Council Member   |
| <input type="checkbox"/> Alpha Delta Kappa  | <input type="checkbox"/> Fire Service Member - All Levels                | <input type="checkbox"/> PEO  |
| <input type="checkbox"/> Alpha Delta Mu   | <input type="checkbox"/> First Catholic Slovak Ladies Association        | <input type="checkbox"/> People to People International                                       |
| <input type="checkbox"/> Alpha Delta Pi   | <input type="checkbox"/> Footwear/Leather & Allied Industries            | <input type="checkbox"/> Phi Alpha Delta  |
| <input type="checkbox"/> Alpha Epsilon Phi  | <input type="checkbox"/> Forestry Club Member                            | <input type="checkbox"/> Phi Alpha Theta  |
| <input type="checkbox"/> Alpha Epsilon Rho  | <input type="checkbox"/> Fort Peck Assiniboine & Sioux Tribe Member      | <input type="checkbox"/> Phi Beta Kappa   |
| <input type="checkbox"/> Alpha Gamma Delta  | <input type="checkbox"/> Foundry Education Foundation                    | <input type="checkbox"/> Phi Beta Lambda  |
| <input type="checkbox"/> Alpha Gamma Rho  | <input type="checkbox"/> Frozen Foods Association of New England         | <input type="checkbox"/> Phi Beta Sigma   |
| <input type="checkbox"/> Alpha Gamma Sigma  | <input type="checkbox"/> Fulfillment Fund                                | <input type="checkbox"/> Phi Chi Theta  |
| <input type="checkbox"/> Alpha Iota Delta   | <input type="checkbox"/> Future Business Leaders of America Clubs        | <input type="checkbox"/> Phi Delta Kappa  |
| <input type="checkbox"/> Alpha Iota Delta of Chi Psi  | <input type="checkbox"/> Future Secretaries Association                  | <input type="checkbox"/> Phi Delta Theta  |
| <input type="checkbox"/> Alpha Kappa Alpha  | <input type="checkbox"/> Gamma Phi Beta                                  | <input type="checkbox"/> Phi Eta Sigma  |
| <input type="checkbox"/> Alpha Lambda Delta   | <input type="checkbox"/> GCSAA Member                                    | <input type="checkbox"/> Phi Gamma Nu Sorority  |
| <input type="checkbox"/> Alpha Mu Gamma   | <input type="checkbox"/> General Federation of Women's Clubs             | <input type="checkbox"/> Phi Kappa Phi  |
| <input type="checkbox"/> Alpha Omicron Pi   | <input type="checkbox"/> General Youth Council                           | <input type="checkbox"/> Phi Kappa Psi  |

- Alpha Phi
- Alpha Phi Sigma
- Alpha Sigma Alpha
- Alpha Sigma Tau
- Alpha Tau
- Alpha Tau Delta
- Alpha Tau Omega
- Alpha Xi Delta
- Alpha Zeta
- Alumni Association
- American Angus Association
- American Association of Critical Care Nurses
- American Association of Family & Consumer Sciences
- American Association of Law Libraries
- American Association of University Women
- American Business Women Association
- American College of Healthcare Executives
- American Congress on Surveying & Mapping
- American Culinary Federation
- American Dairy Goat Association
- American Dental Assistants Association
- American Dental Hygienist's Association
- American Federation of Television & Radio Artists
- American Floral Industry Assoc. Member
- American Goat Society
- American Holistic Nurses Assoc.
- American Home Economics Association
- American Hotel & Motel Assoc. Member Employee
- American Indian Science & Engineering Society
- American Inst. of Certified Public Accountants
- American Institute of Chemical Engineers
- American Jersey Cattle Association
- American Legion
- American Library Association
- American Medical Women's Association
- American Nurses Association
- American Occupational Therapy Association
- American Physical Therapy Association
- American Postal Workers Union
- American Product Inventory Control Society Member
- American Quarter Horse Association
- American Red Cross
- American Share Insurance Credit Union Members
- American Society for Microbiology
- American Society for Photogrammetry & Remote Sensing
- American Society for Quality Control
- American Society of Agricultural Engineers
- American Society of Civil Engineers
- American Society of Composers, Authors & Publishers
- American Society of Heating, Refrigeration, AC Engineers
- American Society of Mechanical Engineers
- American Society of Radiologic Technologists
- American Society of Travel Agents (ASTA)
- American Water Ski Association
- Appaloosa Horse Club or Appalossa Youth Association
- Geological Society of America
- Girl Scout Gold Award
- Girl Scouts of the USA
- Girls Clubs of America
- Glee Club Member
- Golden Key Honor Society
- Goodwill Industries
- Grange Member
- Graphic Communications International Union
- Hawaii Nurses Association
- Hillel Foundation
- Ho-Chunk Nation Member
- IAFF
- IAWM - International Alliance of Women in Music
- IEEE Computer Society Member
- IFT - Institute of Food Technology
- Indiana Sheriffs' Association Member
- Institute of Electrical/Electronic Engineers
- Institute of Industrial Engineers
- Intercollegiate Studies Institute
- International Chemical Workers Union
- International Chiropractors Association
- International Furnishing & Design Association
- International Real Estate Federation
- International Society for Clinical Laboratory Technology
- International Students Organization
- International Technology Education Association
- International Thespian Society
- International Union of Bricklayers & Allied Craftsmen (BAC)
- International Union of Operating Engineers
- International Women Helicopter Pilots
- Iota Sigma Pi
- Jazz Study Program/Jazz Club
- Jewish Student Union
- Jicarilla Apache Nation
- Jobs Daughters
- Junior Academy of Science
- Junior Achievement
- Kam Society - HI
- Kappa Alpha Psi
- Kappa Alpha Theta
- Kappa Delta Pi
- Kappa Delta Sorority
- Kappa Kappa Gamma
- Kappa Omicron Nu
- Kappa Sigma
- Key Club
- Knights of Columbus
- Kotzebue Village Member
- Labor Union
- Lambda Chi Alpha
- Little People of America Association
- Livestock Club Member
- Lutheran Brotherhood
- MACPA
- Phi Kappa Tau
- Phi Kappa Theta
- Phi Mu
- Phi Sigma Iota
- Phi Sigma Sigma
- Phi Theta Kappa
- Phi Upsilon Omicron
- Pi Beta Phi
- Pi Gamma Mu
- Pi Kappa Alpha
- Pi Mu Epsilon
- Professional Engineers in Industry
- Professional Horsemen's Association of America, Inc.
- Professional Plant Growers of America (PPGA)
- Professional Support Staff Organization
- Psi Beta
- Psi Chi Honor Society
- PTA - Parent Teachers Association
- Public Relations Student Society Of America
- Quill & Scroll
- Rainbow Girls
- Rifle Drill Team
- ROA/ROAL - Reserve Officers Association of the USA
- Roller Skating Association
- Roofing Contractors Assoc. of So. California
- Rotaract
- SAE Foundation
- San Mateo County, CA Farm Bureau
- Screen Actors Guild
- Seafarers International Union
- Sertoma Collegiate
- Sigma Alpha Epsilon
- Sigma Alpha Iota
- Sigma Chi
- Sigma Delta Chi
- Sigma Delta Tau
- Sigma Gamma Rho Sorority
- Sigma Kappa
- Sigma Nu
- Sigma Phi Epsilon
- Sigma Pi
- Sigma Sigma Sigma
- SkillsUSA
- Slovenian Womens Union
- SNAME - Society of Naval Architects & Marine Engineers
- Soaring Society of America
- Society for Mining Metallurgy and Exploration (SME)
- Society for Mining, Metallurgy and Exploration
- Society for the Advancement of Material and Process Engineering
- Society of American Military Engineers
- Society of Automotive Engineers
- Society of Distinguished American High School Students
- Society of Manufacturing Engineers (SME)
- Society of Mining Engineers
- Society of Women Engineers

- Applachian State University Alumni
- ARRL
- ASBO - Association of School Business Officials
- ASHA
- ASM International
- ASNE
  
- Associated General Contractors
- Association of Early Childhood Education International
- Association of Government Accountants
- Association of International Students
  
- Association of International Students in Economics/Commerce
- Association of Operating Room Nurses
- Association of Physicians Assistants in Cardiovascular Surgery
- Association of Student Nurses
- Association of Student Social Workers
- Association of Trial Lawyers of America
- Association of Wisconsin Snowmobile Clubs
  
- AWHONN
  
- Baptist Life Association
  
- BCTGM
  
- Beta Alpha Psi
- Beta Club Member
  
- Beta Sigma Phi
  
- Beta Theta Pi
- Big Brothers/Big Sisters
  
- Bois Forte Reservation
  
- Boy Scouts - Eagle Scout
- Boy Scouts of America
- Boys Clubs of America
- Business Education Assn of Main (BEAM)
- California School Library Association
  
- California Society of Professional Engineers
- California Teachers Association
- Catholic Library Association
- Cheerleader, Pom Pom Squad
- Chi Epselon
- Chi Eta Phi Sorority
- Chi Omega
- Choral Member
- Chorus/Choir Member
  
- Church Member
- Civil Air Patrol
  
- Civil Engineering Honor Society
- Cleveland Area Board of Realtors
- Colorado Masons Association
  
- Consumer & Family Studies Assoc. Member
- Costume Society Of America
- Credit Union Member
- Creole Ethnic Association
- Danish Brotherhood of America
- Danish Sisterhood of America
- Delta Chi
- Delta Delta Delta
  
- Maine Skating Club
- Masonic Lodge
- Masonry Contractors Association
- Master Brewers Association of the Americas
- Medical Group Management Association
- MENC - The National Association for Music Education
- Mensa Member
- Mexican-American Engineering Society
  
- Military Order of the Purple Heart
- Minerals, Metals, Materials Society
  
- Minnesota Medical Association
  
- Missouri Nurses Association
- Modern Dance Company
  
- Montana Farm Bureau
- Mortar Board National Foundation
- Mu Alpha Theta
- Mu Phi Epsilon
  
- NAACP - National Association for the Advancement of Colored People
- NABA - National Association of Black Accountants
- NACCA - National Association of County Agricultural Agents
- NAHS - National Art Honors Society
- NALC - National Association of Letter Carriers
- NAMTA - National Art Materials Trade Association
- NANA Shareholder (NW Alaska)
- NAPUS (National Assoc. of Postmasters of the United States)
- NARFE - National Association of Retired Federal Employees
- National Amputee Gold Association
- National Archery Association of the USA
- National Association of School Nurses
- National Athletic Trainers Association
- National Basketball Retired Players Association
- National Benefit Fund
- National Beta Club
- National Black MBA Association Member
- National Black Nurses Association, Inc.
- National Business Association
- National Catholic Library Association
- National Defense Transportation Association
- National Federation of Music Clubs
- National Fraternal Congress of America Member
- National Fraternal Society of the Deaf
- National Gerontological Nursing Association
  
- National Horseshoe Pitchers Association
- National Intercollegiate Rodeo Association
- National Junior Angus Association
  
- National Junior Classical League
- National Merit Scholarship Corporation
- National Retail Hardware Association
- National Rifle Association of America
- National Roofing Contractors Association
- National Slovak Society
- National Society of Accountants
- National Society of Black Engineers
  
- Soil & Water Conservation Society
- Solid Waste Association of North America
- Sons of Norway
- Sons of the American Revolution
- South Carolina State Employee's Association
- South Central Modern Language Association
  
- Special Libraries Association
- Spina Bifida Association of America
  
- Starfleet Academy
- State Department Federal Credit Union, Member
- Student Advantage Member
  
- Student Alumni Association
- Student California Teachers Association
  
- Student Council
- Student Education Association (SEA)
- Student Government Association
- Student Member or Employee Of School Union
- Students of Service (SOS)
  
- Tau Beta Pi
- Tau Kappa Epsilon
  
- Technology Student Association
- Texas A&M Corps of Cadets
  
- Texas Retired Teachers Foundation
  
- Theta Chi
- Theta Phi Alpha
  
- Theta Tau Epsilon
  
- TIACA
- Timber Industry Association Member
- TMS
- Transport Workers Union of America
- Transportation Clubs International
  
- Trappers Association
- TREA
- Triangle Fraternity
- TROA - The Retired Officers Association
- U.S. Association for Blind Athletes
- U.S. Submarine Veterans of WW II
- UAL/UABT - United Agribusiness Benefit Trust
- UFCW - United Food & Commercial Workers
- Ukrainian Fraternal Association
  
- Union Member
- UNITE - Union of Needle Trades, Industrial & Textile Employees
- United Daughter of Confederacy
- United Mine Workers Association
- United South and Eastern Tribes, Inc. Member
- United States Pony Club
- University Singers Ensemble
- Upsilon Pi Epsilon
- USA Waterski Association
- USTA - U.S. Tennis Association
- Vermont Grocers Association
- VICA - Vocational Industrial Clubs of America
- Virginia Tech Cycling Club

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Delta Epsilon Chi         | <input type="checkbox"/> National Society of Professional Engineers   | <input type="checkbox"/> Volunteer Firefighter                           |
| <input type="checkbox"/> Delta Gamma Fraternity    | <input type="checkbox"/> National Strength & Conditioning Association | <input type="checkbox"/> Water Environment Federation Member             |
| <input type="checkbox"/> Delta Kappa Gamma Society | <input type="checkbox"/> National Women's Studies Association         | <input type="checkbox"/> Western Fraternal Life Association              |
| <input type="checkbox"/> Delta Phi Epsilon         | <input type="checkbox"/> Native Daughters of the Golden West          | <input type="checkbox"/> WSECU - Washington State Employees Credit Union |
| <input type="checkbox"/> Delta Sigma Phi           | <input type="checkbox"/> NCHA - National Campers & Hikers Association | <input type="checkbox"/> Xi Sigma Pi                                     |
| <input type="checkbox"/> Delta Sigma Pi            | <input type="checkbox"/> Nebraska Grain Sorghum Producers Association | <input type="checkbox"/> Yakima Valley Growers-Shippers Association      |
| <input type="checkbox"/> Delta Sigma Theta, Inc    | <input type="checkbox"/> New England Water Works Association          | <input type="checkbox"/> YMCA - Young Men's Christian Association        |
| <input type="checkbox"/> Delta Tau Alpha           | <input type="checkbox"/> New Jersey Steel Association, Inc.           | <input type="checkbox"/> Young American Bowling Alliance                 |
| <input type="checkbox"/> Delta Tau Delta           | <input type="checkbox"/> New Mexico Farm and Livestock Bureau         | <input type="checkbox"/> Youth Leadership Organization                   |
| <input type="checkbox"/> Delta Upsilon             | <input type="checkbox"/> New Mexico High School Rodeo Association     | <input type="checkbox"/> YWCA - Young Women's Christian Association      |
| <input type="checkbox"/> Delta Zeta                | <input type="checkbox"/> New York State Assn of Fire Chiefs           | <input type="checkbox"/> Zeta Phi Beta Sorority                          |
| <input type="checkbox"/> DeMolay Member            | <input type="checkbox"/> New York State Grange                        | <input type="checkbox"/> Zeta Tau Alpha                                  |

## Religion

### Select All

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Agnostic                                  | <input type="checkbox"/> Confucianism        | <input type="checkbox"/> Nonreligious               |
| <input type="checkbox"/> All Religions (encompasses all religions) | <input type="checkbox"/> Disciples of Christ | <input type="checkbox"/> Paganism                   |
| <input type="checkbox"/> Amish                                     | <input type="checkbox"/> Episcopal           | <input type="checkbox"/> Presbyterian               |
| <input type="checkbox"/> Atheist                                   | <input type="checkbox"/> Evangelical         | <input type="checkbox"/> Protestant                 |
| <input type="checkbox"/> Baha'i                                    | <input type="checkbox"/> Greek Orthodox      | <input type="checkbox"/> Quaker                     |
| <input type="checkbox"/> Baptist                                   | <input type="checkbox"/> Hinduism            | <input type="checkbox"/> Reformed Church in America |
| <input type="checkbox"/> Buddhism                                  | <input type="checkbox"/> Islam/Muslim        | <input type="checkbox"/> Romanian Orthodox          |
| <input type="checkbox"/> Catholic                                  | <input type="checkbox"/> Jainism             | <input type="checkbox"/> Shinto                     |
| <input type="checkbox"/> Christian Science                         | <input type="checkbox"/> Jesuit              | <input type="checkbox"/> Sikhism                    |
| <input type="checkbox"/> Christianity                              | <input type="checkbox"/> Judaism/Jewish      | <input type="checkbox"/> Taoism                     |
| <input type="checkbox"/> Church of Christ                          | <input type="checkbox"/> Lutheran            | <input type="checkbox"/> Unitarian                  |
| <input type="checkbox"/> Church of Jesus Christ - LDS              | <input type="checkbox"/> Mennonite           | <input type="checkbox"/> Zoroastrianism             |
| <input type="checkbox"/> Church of the Brethren                    | <input type="checkbox"/> Methodist           |   |

## Special Attributes/Interests

### Select All

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Adopted/Foster Child/Orphan              | <input type="checkbox"/> English As A Second Language                           | <input type="checkbox"/> Political Party Activist- Republican    |
| <input type="checkbox"/> Affected by Sept. 11th Attacks           | <input type="checkbox"/> Environmental Activism                                 | <input type="checkbox"/> Public Assistance Recipient             |
| <input type="checkbox"/> Against The Death Penalty                | <input type="checkbox"/> Farmer   | <input type="checkbox"/> Public Housing Resident                 |
| <input type="checkbox"/> Alcohol Addiction/Recovery               | <input type="checkbox"/> Feminist   | <input type="checkbox"/> Recovering From Alcohol/Substance Abuse |
| <input type="checkbox"/> Animal/Pet Care Experience               | <input type="checkbox"/> First Generation College Student                       | <input type="checkbox"/> Refugee/Immigrant                       |
| <input type="checkbox"/> Bilingual                                | <input type="checkbox"/> Google Scholarships                                    | <input type="checkbox"/> Returning/Continuing Student            |
| <input type="checkbox"/> Birth Mother Placed a Child for Adoption | <input type="checkbox"/> Greek/Hellenic Heritage                                | <input type="checkbox"/> Single Parent                           |
| <input type="checkbox"/> Canadian Citizen                         | <input type="checkbox"/> Head of Household                                      | <input type="checkbox"/> Social Action                           |
| <input type="checkbox"/> Cancer Patient/Survivor (or Child of)    | <input type="checkbox"/> Left-Handed People                                     | <input type="checkbox"/> Study Abroad                            |
| <input type="checkbox"/> Child of Illegal Immigrant               | <input type="checkbox"/> Lesbian/Gay/Bisexual/Transgender (LGBT) or Parent LGBT | <input type="checkbox"/> Tall People                             |
| <input type="checkbox"/> Child of Single Parent                   | <input type="checkbox"/> Little People  | <input type="checkbox"/> Transfer Students                       |
| <input type="checkbox"/> Community Service                        | <input type="checkbox"/> Multiple Birth Sibling (twins, triplets, etc.)         | <input type="checkbox"/> Transgender                             |
| <input type="checkbox"/> Displaced Homemaker                      | <input type="checkbox"/> Overweight Acceptance Supporter                        | <input type="checkbox"/> Transplant Candidate/Recipient          |
| <input type="checkbox"/> Domestic Abuse Victim                    | <input type="checkbox"/> Parent of Multiples (twins, triplets, etc.)            | <input type="checkbox"/> Twins/Triplets                          |
| <input type="checkbox"/> Drug Addiction/Recovery/Conviction       | <input type="checkbox"/> Parent, Student with dependent children                | <input type="checkbox"/> Vegetarian/Vegan                        |
| <input type="checkbox"/> Duck Calling                             | <input type="checkbox"/> Political Party Activist- Democrat                     |  |

## College

This is merely a sample of available college selects. All accredited colleges and universities in the U.S. are available

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> 4-States Academy of Cosmetology                          | <input type="checkbox"/> Georgian Court University   | <input type="checkbox"/> Prairie View A & M University |
| <input type="checkbox"/> 4-States Okmulgee Academy of Cosmetology                 | <input type="checkbox"/> Germanna Community College  | <input type="checkbox"/> Pratt Community College       |
| <input type="checkbox"/> A T Still University of Health Sciences                  | <input type="checkbox"/> Gettysburg College          | <input type="checkbox"/> Pratt Institute-Main          |
| <input type="checkbox"/> A.B.I. School of Barbering & Cosmetology of Tribeca Inc. | <input type="checkbox"/> Gibbs College               | <input type="checkbox"/> Presbyterian College          |
| <input type="checkbox"/> Aaron's Academy of Beauty                                | <input type="checkbox"/> Glen Oaks Community College | <input type="checkbox"/> Prescott College              |

- Aaron's Academy of Beauty
- Abbott Academy of Cosmetology Arts and Sciences LLC
- Abdill Career College Inc
- Abilene Christian University
- Abington Memorial Hospital Dixon School of Nursing
- Abraham Baldwin Agricultural College
- Abram Friedman Occupational Center
- Academia Vocational Del Turabo
- Academy College
- Academy Di Capelli-School of Cosmetology
- Academy Education Services
- Academy for Element Acupuncture
- Academy for Five Element Acupuncture
- Academy for Practical Nursing and Health Occupations
- Academy of Art University
- Academy of Career Training
- Academy of Careers and Technology
- Academy of Cosmetology
- Academy of Hair Design
- Academy of Hair Design
- Academy of Hair Technology
- Academy of Healing Arts
- Academy of Healing Arts Massage & Facial Skin Care
- Academy of Massage and Bodywork
- Academy of Natural Therapy
- Academy of Professional Careers
- Academy of Somatic Healing Arts
- Acadiana Technical College-Lafayette Campus
- Accutech Career Institute
- Ace Computer Training Center
- Adams State College
- Adelphi University
- Adirondack Community College
- Adler Graduate School
- Adler School of Professional Psychology
- Adrian College
- Adrians Beauty College of Turlock
- Advanced Technology Institute
- Aerosim Flight Academy
- Agnes Scott College
- AI Miami International University of Art and Design
- AIB College of Business
- Aiken Technical College
- Aims Community College
- Akron Adult Vocational Services
- Akron Institute of Herzing University
- Akron School of Practical Nursing
- Alabama A & M University
- Alabama Southern Community College
- Alabama State University
- Alamance Community College
- Alaska Pacific University
- Albany BOCES-Adult Practical Nursing Program
- Albany College of Pharmacy and Health Sciences
- Albany Law School
- Albany Medical College
- Albany State University
- Albany Technical College
- Albert I Prince Technical High School
- Albertus Magnus College
- Albion College
- Albright College
- Glen Oaks Community College
- Glendale Career College
- Glendale Community College
- Glendale Community College
- Glenville State College
- Globe University-Woodbury
- Gloucester County College
- Gnomon School of Visual Effects
- Goddard College
- Golden Gate University-San Francisco
- Golden West College
- Goldey-Beacom College
- Gonzaga University
- Goodwin College
- Gordon College
- Gordon College
- Gordon-Conwell Theological Seminary
- Goshen College
- Goucher College
- Governors State University
- Grace Bible College
- Grace College and Theological Seminary
- Grace University
- Graceland University-Lamoni
- Grambling State University
- Grand Canyon University
- Grand Rapids Community College
- Grand Valley State University
- Grand View University
- Granite State College
- Grays Harbor College
- Grayson County College
- Great Basin College
- Great Bay Community College
- Green Mountain College
- Green River Community College
- Greenfield Community College
- Greensboro College
- Greenville College
- Greenville Technical College
- Grinnell College
- Grossmont College
- Grove City College
- Guilford College
- Guilford Technical Community College
- Gulf Coast State College
- Gupton Jones College of Funeral Service
- Gustavus Adolphus College
- Gwinnett Technical College
- Gwynedd Mercy College
- H Council Trenholm State Technical College
- Hagerstown Community College
- Halifax Community College
- Hallmark College of Technology/Hallmark College of Aeronautics
- Hallmark Institute of Photography
- Hamilton College
- Hamilton Fulton Montgomery BOCES-Practical Nursing Program
- Hamline University
- Hampden-Sydney College
- Hampshire College
- Hampton University
- Hannibal-LaGrange University
- Prescott College
- Presentation College
- Prince George's Community College
- Princeton University
- Prism Career Institute-West Atlantic City
- Professional Careers Institute
- Proteus
- Providence College
- Provo College-Provo
- Pueblo Community College
- Pulaski Technical College
- Purdue University-Calumet Campus
- Purdue University-Main Campus
- Purdue University-North Central Campus
- Queens University of Charlotte
- Quincy College
- Quincy University
- Quinebaug Valley Community College
- Quinnipiac University
- Quinsigamond Community College
- Radford University
- Ramapo College of New Jersey
- Randolph College
- Randolph Community College
- Randolph-Macon College
- Ranger College
- Ranken Technical College
- Rappahannock Community College
- Raritan Valley Community College
- Rasmussen College-Aurora
- Rasmussen College-Eagan
- Rasmussen College-Eden Prairie
- Rasmussen College-Florida
- Rasmussen College-Fort Myers
- Rasmussen College-Lake Elmo
- Rasmussen College-North Dakota
- Rasmussen College-Wisconsin
- Reading Area Community College
- Red Rocks Community College
- Redlands Community College
- Redstone College
- Reed College
- Reedley College
- Regency Beauty Institute-Akron
- Regency Beauty Institute-Austin
- Regency Beauty Institute-Charlotte
- Regency Beauty Institute-Cincinnati
- Regency Beauty Institute-Columbus
- Regency Beauty Institute-Cypresswood
- Regency Beauty Institute-Dayton
- Regency Beauty Institute-Detroit Southgate
- Regency Beauty Institute-East Tucson
- Regency Beauty Institute-Elgin
- Regency Beauty Institute-Flint
- Regency Beauty Institute-Fort Collins
- Regency Beauty Institute-Grand Rapids
- Regency Beauty Institute-Greenfield
- Regency Beauty Institute-Indianapolis
- Regency Beauty Institute-Joliet
- Regency Beauty Institute-Lakewood
- Regency Beauty Institute-Mesa
- Regency Beauty Institute-Metro Center

- Albright College
- Alcorn State University
- Alden's School of Cosmetology
- Alderson Broaddus College
- Alegent Health School of Radiologic Technology
- Alexandria Technical & Community College
- Alfred University
- Alice Lloyd College
- Allan Hancock College
- Allegany College of Maryland
- Allegheny College
- Allen College
- Allen County Community College
- Allen University
- Alliant International University
- Alliant International University
- Alma College
- Alpena Community College
- Alpine College
- Alvernia University
- Alverno College
- Alvin Community College
- Amarillo College
- Amberton University
- American Academy McAllister Institute of Funeral Service
- American Academy of Art
- American Academy of Dramatic Arts-Los Angeles
- American Academy of Dramatic Arts-New York
- American Baptist College
- American Baptist Seminary of the West
- American Career College-Los Angeles
- American College of California
- American Film Institute Conservatory
- American Indian College of the Assemblies of God Inc
- American Institute
- American Institute of Medical Technology
- American Institute of Technology
- American InterContinental University-Atlanta
- American InterContinental University-Online
- American International College
- American Musical and Dramatic Academy
- American Pacific College
- American Public University System
- American River College
- American Samoa Community College
- American University
- Amherst College
- Ancilla College
- Anderson University
- Anderson University
- Andover Newton Theological School
- Andrew College
- Andrews University
- Angelina College
- Angelo State University
- Anna Maria College
- Anne Arundel Community College
- Anoka Technical College
- Anoka-Ramsey Community College
- Antelope Valley College
- Anthem College-Brookfield
- Anthem College-Maryland Heights
- Appalachian State University
- Hanover College
- Harcum College
- Hardin-Simmons University
- Harding University
- Harford Community College
- Harper College
- Harrington College of Design
- Harris School of Business-Hamilton Campus
- Harris-Stowe State University
- Harrisburg Area Community College-Harrisburg
- Harrisburg Area Community College-York
- Harrison College-Elkhart
- Harrison College-Indianapolis
- Harrison College-Muncie
- Hartnell College
- Hartwick College
- Harvard University
- Harvey Mudd College
- Haskell Indian Nations University
- Hastings College
- Haverford College
- Hawaii Business College
- Hawaii Community College
- Hawaii Pacific University
- Hawkeye Community College
- Haywood Community College
- Hazard Community and Technical College
- Hazelden Graduate School of Addiction Studies
- Heald College-Concord
- Heald College-Fresno
- Heald College-Hayward
- Heald College-Roseville
- Heald College-Stockton
- Health Opportunity Technical Center
- Healthy Hair Academy
- Heart of Georgia Technical College
- Heartland Community College
- Heidelberg University
- Henderson Community College
- Henderson State University
- Hendrix College
- Hennepin Technical College
- Henry Ford Community College
- Heritage College-Oklahoma City
- Heritage University
- Herkimer County Community College
- Herzing University-Atlanta
- Herzing University-Madison
- Hesser College
- Hesston College
- Hi-Tech School of Cosmetology
- Hibbing Community College-A Technical and Community College
- Hickey College
- High Point University
- Highland Community College
- Highland Community College
- Highline Community College
- Hilbert College
- Hill College
- Hillsborough Community College
- Hinds Community College
- Regency Beauty Institute-Medical Center
- Regency Beauty Institute-Nashville
- Regency Beauty Institute-North Olmsted
- Regency Beauty Institute-Pasadena
- Regency Beauty Institute-Rockford
- Regency Beauty Institute-Springdale
- Regency Beauty Institute-Tolleson
- Regency Beauty Institute-Topeka
- Regency Beauty Institute-Westminster
- Regent University
- Regina's College of Beauty-Monroe
- Regis College
- Regis University
- Reinhardt University
- Remington College-Cleveland Campus
- Remington College-Houston Southeast Campus
- Remington College-Lafayette Campus
- Remington College-Mobile Campus
- Remington College-Shreveport Campus
- Remington College-Tampa Campus
- Rend Lake College
- Rensselaer Polytechnic Institute
- Renton Technical College
- Rhode Island College
- Rhode Island School of Design
- Rhodes College
- Rice University
- Richard Bland College of the College of William and Mary
- Richland College
- Richland Community College
- Richmond Community College
- Richmond School of Health and Technology
- Rider University
- Ridgewater College
- Ringling College of Art and Design
- Rio Hondo College
- Rio Salado College
- Ripon College
- Riverland Community College
- Riverside City College
- Rivier College
- Roane State Community College
- Roanoke College
- Robert Morris University
- Robert Morris University Illinois
- Roberts Wesleyan College
- Robeson Community College
- Rochester College
- Rochester Community and Technical College
- Rochester Institute of Technology
- Rock Valley College
- Rockford College
- Rockhurst University
- Rockingham Community College
- Rockland Community College
- Rocky Mountain College
- Rocky Mountain College of Art and Design
- Roger Williams University
- Rogers State University
- Rogue Community College
- Rolla Technical Institute
- Rollins College





American Student Marketing, 430 Park Avenue, Highland Park, IL 60035

## **Exhibit K**

# **American Student Marketing LGBT Possible Marketing Opportunities**



Make Connections with  
**MultiCultural Youths...**



counts@asmdm.com | 847.432.4329 x113

Segments

Request Information

Privacy Policy

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Terms & Conditions

## List Segments

College Bound Students

High School Students

College Students

Graduated College Students

Graduate School Students

Multicultural Youth

Young Professionals

Households with Children

Young Adults

African American

Hispanic American

Asian American

Native American

Millennial/Generation Y

Generation X

Baby Boomers

LGBT

## More Information

Online Marketing

Email Marketing

Postal Direct Marketing

Count Requests

## LGBT (Lesbian/Gay/Bisexual/Transgender)

DOWNLOAD RATE CARD

High School, College Bound High School, College, College Graduates, Grad School, Parents, Families, Young Professionals, Workforce, Households, Email, Postal, Digital, Social Media Marketing File

**Total Available: 225,000 Records**

American Student Marketing is the exclusive and sole manager of the Scholarships.com user file. This means that the rich demographic consumer information you are renting is derived directly from Scholarships.com, as opposed to a compiled or appended file one might find elsewhere in the market. The file offers an expansive listing of high school, college bound high school, college, college graduates, grad school, students, parents, young professionals, workforce and households data.

You may use the file to search for students and parents by home and email address, academic and artistic interests, athletic interest and involvement, student organizations, honor societies and awards, disabilities, ethnicities, religious affiliations, gender, GPA/SAT/ACT, demographics, geographic information and much more. The file is available for outreach via postal direct, email mobile, text, digital social media campaigns and more.

### Possible Marketing Opportunities

- Attire
- Accessories
- Cosmetics
- Electronic Equipment
- Cell Phones
- Computers and Computer Accessories
- Test-Prep Organizations
- Trade and Career Education Institutions
- Scholarships
- Loans
- Credit Cards
- Textbooks
- Magazines
- CD's and CD Players
- MP3 Players and Databases

### Data Exclusively Provided By:















### Base Fees

- Email: \$95/M
- Postal: \$95/M

### Selects Available

- ACT/SAT/GED Score: \$10/M
- Age/DOB: \$10/M
- Art/Music/Theater Abilities: \$10/M
- Athletic Abilities: \$10/M
- Class Rank: \$10/M
- College Intended/Attending/Attended: \$10/M
- Country/International: \$10/M
- Disabilities: \$10/M
- Employer Information: \$10/M
- Enrollment Status: \$10/M
- Ethnicity: \$10/M
- Gender: \$10/M
- Grade Point Average: \$10/M
- Honor Society Membership: \$10/M

847.432.4329 x113

-  Hotline: \$25/M
-  Household Income: \$10/M
-  Major/Intended Area of Study: \$10/M
-  Marital Status: \$10/M
-  Organization Member: \$10/M
-  Parent of Student: \$10/M
-  Recency: \$10/M
-  Religion: \$10/M
-  School Year: \$10/M
-  State/County: \$10/M
-  Telephone Number: \$50/M
-  ZIP Code/SCF: \$10/M

#### Postal Delivery Fees

-  CD Delivery: \$50/M
-  Email File Delivery: \$50.00
-  FTP Delivery: \$50.00



#### Email Delivery Fees

-  Email Deployment: \$0/M

#### Restrictions/Limitations

-  Minimum Order: 10,000 Records

#### Cancellation Policy

-  All postal orders are non-cancelable after delivery of the data file.
-  All email orders are non-cancelable once email tests have been deployed.

For more information regarding cancellation policy, [please click here to view our Terms and Conditions](#).

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[List Count Tool](#)

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