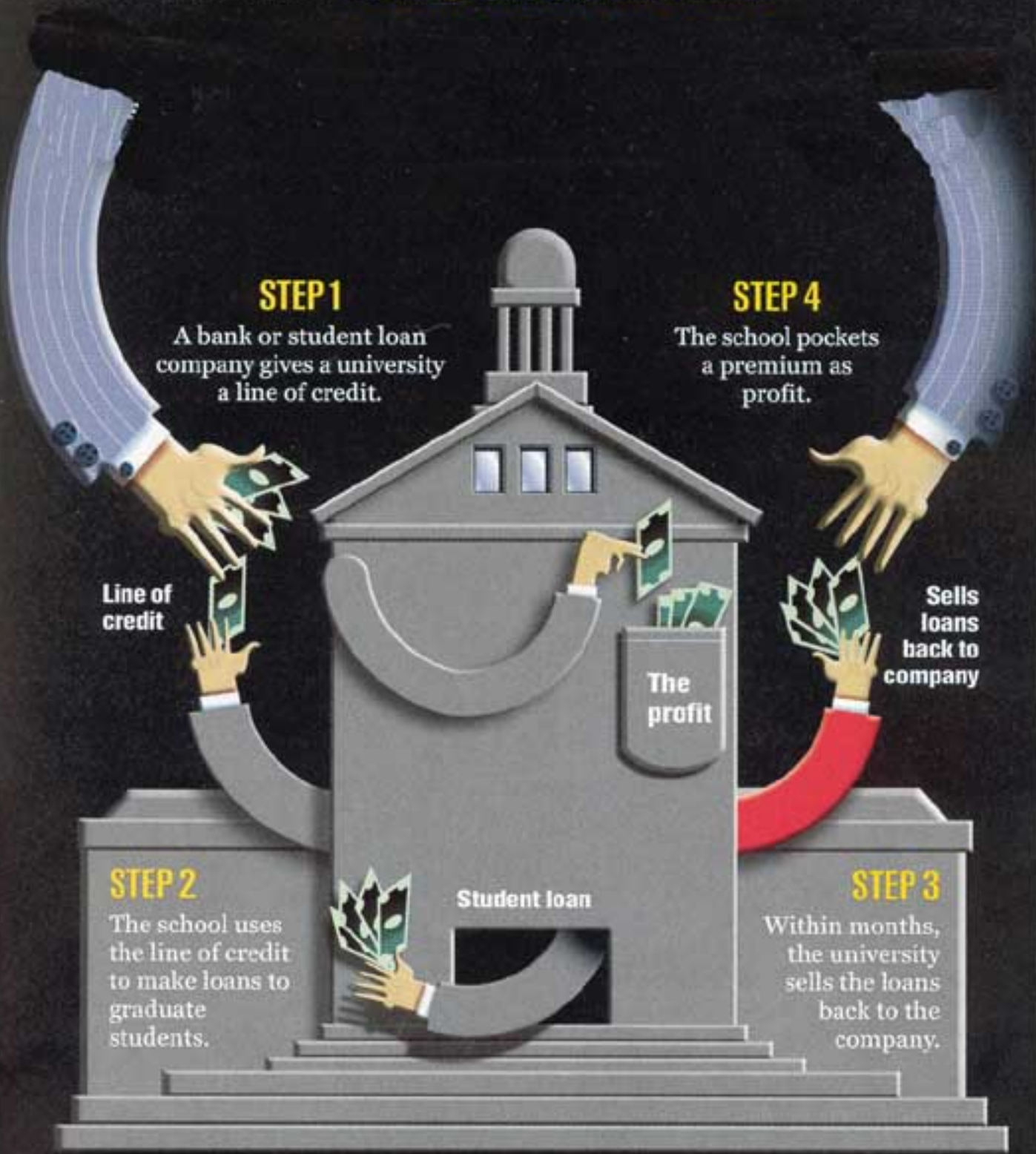


THE TACTIC **Turning schools into banks**



Kickback Contingent On College Not Participating in Direct Lending