STATE OF NORTH CAROLINA COUNTY OF WAKE

STATE OF NORTH CAROLINA, *ex rel*. JOSHUA H. STEIN, Attorney General,

Plaintiff,

v.

STEPPING STONE PHLEBOTOMY, LLC.

Defendant.

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION File No.

0.01020215

COMPLAINT and MOTION FOR TEMPORARY RESTRAINING ORDER

INTRODUCTION

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1. The State of North Carolina brings this action against Stepping Stone Phlebotomy, LLC, alleging violations of the Unfair and Deceptive Trade Practices Act, N.C. Gen. Stat. § 75-1.1, *et seq.*, for operating a proprietary school without a license, as mandated by N.C. Gen. Stat. § 115D-90, *et seq.* The State seeks a Temporary Restraining Order and other injunctive relief against defendant, civil penalties, restitution for victims, attorneys' fees, and other costs.

PARTIES

Plaintiff is the State of North Carolina, by and through its Attorney General, Joshua
 H. Stein, who brings this action pursuant to authority granted by Chapters 75 and 114 of the North
 Carolina General Statutes.

3. Defendant Stepping Stone Phlebotomy, LLC, d/b/a Stepping Stone Medical, ("Stepping Stone") is a privately owned North Carolina company whose primary business is operating a proprietary school located at 218 W. Broad St., Suite A, Statesville, NC 28677.

RELEVANT STATUTORY PROVISIONS

4. The General Assembly has recognized "the importance of higher education and of the particular significance attached to the personal credentials accessible through higher education" in all public and private post-secondary entities. N.C. Gen. Stat. § 116-15.

5. Under North Carolina law, a proprietary school is any privately owned postsecondary institution that provides vocational training or education credentials below the associate degree level. N.C. Gen. Stat. § 115D-87(2). Any institution meeting this statutory definition must have a license to operate. N.C. Gen. Stat. § 115D-90. The purpose of proprietary school licensure and supervision is to (1) "protect the health, safety and welfare of the public by having proprietary schools maintain . . . sufficient and proper facilities . . . and qualified teaching and administrative staff," (2) ensure the school has "satisfactory programs of operation and instruction," and (3) ensure the school carries out its "advertised promises and contract[s] made with its students and patrons." N.C. Gen. Stat. § 115D-89.

6. To accomplish this purpose of protecting the public and consumers, North Carolina's proprietary school licensing laws set up several crucial consumer protections to ensure that consumers are receiving training that is at least minimally comparable to the value they are paying. These statutory protections are enforced by the Office of Proprietary Schools ("OPS").¹

7. The first step in enforcing these protections is the license application process. When a school applies for a license, OPS investigates many aspects of the school, including but not limited to, whether the curriculum is comparable to other public and private schools offering

¹ The State Board of Proprietary Schools (SBPS) is a part of the North Carolina Community Colleges System. The State Board of Community Colleges acts through the SBPS and its corresponding administrative unit, the Office of Proprietary Schools ("OPS"), to license and regulate proprietary schools in North Carolina. N.C. Gen. Stat. §§ 115D-89 through 89.4.

similar instruction; whether the instructors have adequate education and experience; whether the facilities are in adequate condition to provide quality training; whether the school uses erroneous or misleading advertising; and whether the school is financially sound and capable of fulfilling its commitments to its students. *See generally* N.C. Gen. Stat. § 115D-90(c)(1)-(13). Once OPS verifies that these basic standards have been met, then they may grant a license.

8. OPS then ensures that consumers continue to receive at least a basic quality of training through its annual license renewal program by verifying that the school has maintained the minimum standards required to obtain a license. N.C. Gen. Stat. § 115D-91(b).

9. A final and critically important protection for consumers is that in order to maintain a proprietary school license, the school must post a bond and contribute to the Student Protection Fund. N.C. Gen. Stat. §§ 115D-95; 115D-95.1. The bond covers students' loss of tuition, fees, or other instructional-related expenses in the event the school ceases to operate for any reason, including but not limited to suspension, revocation, or nonrenewal of the school's license; bankruptcy; or foreclosure. N.C. Gen. Stat. § 115D-95. The Student Protection Fund serves as a back-up protection in the event that the bond is not enough to compensate the losses suffered by students in the event of school closure. N.C. Gen. Stat. § 115D-95.1.

FACTUAL ALLEGATIONS

10. Defendant Stepping Stone meets the definition of a proprietary school provided under N.C. Gen. Stat. § 115D-87(2) and thus must comply with the licensing requirements enumerated in N.C. Gen. Stat. § 115D-90 and enforced by the North Carolina State Board of Proprietary Schools.

11. Because Defendant has failed to submit an application for licensure, no one has verified whether the price of Defendant's curriculum is comparable to other schools offering

similar instruction; no one has verified whether Defendant's instructors are qualified to provide medical training; no one has verified whether the facilities and equipment being used are adequate to provide quality training; no one has verified whether Defendant's advertising is erroneous or misleading; and no one has verified whether Defendant is financially sound and capable of fulfilling its commitments to its students. N.C. Gen. Stat. § 115D-90(c)(1)-(13).

12. Defendant has also not posted bond nor contributed to the Student Protection Fund, resulting in its students being vulnerable to financial harm in the event Stepping Stone ceases to operate. N.C. Gen. Stat. §§ 115D-95, 115D-95.1.

Stepping Stone's North Carolina Operations

13. Defendant Stepping Stone is a Statesville-based proprietary school that charges tuition for vocational training targeted towards North Carolina citizens who are interested in pursuing careers as phlebotomy technicians, EKG technicians, medical assistants, and/or medical biller and coders.

14. Stepping Stone was registered as a North Carolina Limited Liability Company on June 6, 2017. At all times, Janecia R. Sanders has been the sole officer of Stepping Stone. On information and belief, Sanders has been in control of Stepping Stone. She coordinates the courses, promotes and markets the courses, collects payment for the courses, and is an instructor that teaches the courses. *See* Secretary of State Registration, attached as Ex. 1.

15. Sometime shortly thereafter, Stepping Stone began marketing and conducting phlebotomy and medical assistant courses within the state. Sometime during February or March 2020, Defendant also began offering EKG technician and medical billing and coding courses. Affidavit of David Evers, Attachments A, B, C, D, & J, attached as Ex. 2 (hereinafter "Evers Aff."). Defendant also offers a medical administrative assistant course of study and a basic

lifesaving skills class. Evers Aff., Attachments E, F; see also

https://ssphlebotomy.enrollware.com/schedule (as last visited on July 23, 2020)

16. Phlebotomy is the practice of surgically opening or puncturing a vein to withdraw blood or introduce fluid. Defendant claims to teach this skill in its Certified Phlebotomy Technician course. Defendant charges students \$1,000.00 for this course. *See* Evers Aff., Attachment A.

17. The title of "Medical Assistant" is slightly amorphous; however, Defendant's Certified Clinical Medical Assistant ourse claims to teach students how to "check patients in and out upon arrival and departure; answer phone calls and questions, assist providers with exams and procedures; administer injections; work in the electronic health record; perform EKG, phlebotomy, and laboratory procedures; and take patient vital signs." *See* Evers Aff., Attachment B. Defendant charges students \$3,000.00 for this course. *Id.*

18. EKG Technicians set up and administer electrocardiograms and stress tests, prepare patients for Holter or ambulatory monitoring, edit and deliver final test results to physicians for analysis, schedule appointments, and transcribe physician's interpretations. Defendant claims to teach these skills in a ten-hour course over five weeks. Defendant charges \$950.00 for this course. *See* Evers Aff., Attachment D.

19. In the medical billing and coding class, Defendant claims to teach students how to "gather/review essential patient information; verify required documentation before patient information is released; prevent fraud/abuse by auditing billing; assign codes for diagnosis and procedures; submit claims for reimbursement; [and] coach healthcare providers to achieve optimal reimbursement." Defendant claims to teach these skills in a sixteen-hour course over an eightweek period. Defendant charges \$2,500.00 for this course. *See* Evers Aff., Attachment C.

20. In the medical administrative assistant course of study, Defendant claims to teach students how to: review and answer practice correspondence; operate computer systems to accomplish office tasks; answer calls, schedule appointments, greet patients and maintain files; update and maintain patient and other practice-pacific information; and coordinate operation reports such as time and attendee. Defendant claims to teach these skills in a fourteen-hour course over a seven week period via Zoom. Defendant charges \$2,000.00 for this course. *See* Evers Aff., Attachment F.

21. Students register for a course on Defendant's website, then pay with cash, credit card, debit card, or through PayPal. On information and belief, Defendant has hosted the courses predominately in North Carolina, but occasionally in South Carolina, Connecticut, and Virginia. Defendant also hosts classes electronically via the Zoom meeting software.

22. On information and belief, students in several of these courses practice puncturing veins and drawing blood. Defendant first instructs students to practice on test equipment, then, in an uninspected facility, students are guided through drawing blood from live people by an instructor whose credentials have not been verified.

23. Defendant's website and social media accounts claim that these courses are "nationally certified in all 50 states through the (NHA) National Healthcare Association" and that "once you complete our course you will be a Nationally Certified Phlebotomy Technician Meaning[sic] you can work in all 50 states." Defendant's website further promises "highly qualified instruction along with an outstanding curriculum" designed to "produce medical professionals whose understanding of safety and correct techniques are unmatched."

Defendants' Repeated Failure to Obtain a License or Respond to Regulators

24. On January 28, 2018, South Carolina's Commission on Higher Education contacted the Office of Proprietary Schools ("OPS") regarding Defendant. The Commission inquired about whether Defendant was licensed in North Carolina following reports that it was hosting unlicensed courses in South Carolina. OPS informed the Commission that Defendant was not licensed in North Carolina. *See* Affidavit of Rasheeda McCormick at ¶ 3, attached as Ex. 3 (hereinafter "McCormick Aff.").

25. On February 5, 2018, OPS Program Auditor Rasheeda McCormick, spoke with Janecia Sanders on the phone and informed her that Stepping Stone needed to apply for licensure in North Carolina. Ms. McCormick followed up in an email to Defendant providing the link for the application for licensure. Defendant did not respond to the email, OPS never received an application, and Defendant continued to advertise and host courses. *See* McCormick Aff. at ¶¶ 4-5.

26. On February 28, 2018, Connecticut's Office of Higher Education contacted OPS regarding Defendant. The Office of Higher Education stated that they had received a complaint about Defendant and inquired as to whether anyone had been in touch with someone at the company, as their office had been unsuccessful in making contact. *Id.* at \P 6.

27. On March 5, 2018, a month after OPS notified Defendant that it required licensure, Ms. McCormick sent Defendant another email warning that OPS had not received an application and that if Defendant continued to operate without applying for a license, they would be reported to the North Carolina Attorney General's Office. Defendant never responded to this email, OPS never received an application, and Defendant continued to advertise and host courses. *Id.* at ¶ 7.

28. Over a year later, OPS discovered that Defendant continued to hold phlebotomy and medical assistant courses, in direct defiance of the law and OPS direction. *Id.* at \P 8.

29. On September 23, 2019, OPS reported Defendant's continued operation to the North Carolina Attorney General's Office. *Id.*

30. OPS has not received an application for licensure from Defendant. Id.

31. On information and belief, Defendant is still operating and has courses scheduled over the next six months. On social media, Defendant has posted videos of what appears to be students puncturing veins of live patients. *See* Evers Aff., para. 12.



Social media post available at https://www.facebook.com/watch/?v=3420808571293730

32. After being given proper notice from OPS and ample time to remedy the discrepancy, Defendant continues to openly defy state regulators and North Carolina law by continuing to operate illegally.

33. Defendant continues to promote its unlicensed programs via the internet – including on its own website (www.ssphlebotomy.com) and on social media. Defendant's website advertises the \$1,000 phlebotomy classes scheduled through December 2020; the \$2,800 medical assistant classes scheduled through December 2020; the \$950 EKG technician classes scheduled through July 2020; and the medical billing and coding classes scheduled through August 2020. *See* Evers Aff., Attachments A-F. Though all of these programs meet the requirements of N.C. Gen. Stat. § 115D-87(2) requiring licensure, none have been approved by OPS and no application has been submitted.

34. Defendant continues to actively advertise courses using social media without disclosing that they are unlicensed. For example, in a Facebook post Defendant claims to be "a one stop shop" for phlebotomy certification. *See* Evers Aff., Attachment K.

35. Not only do these advertisements fail to disclose to consumers that these classes are unlicensed and how that status could affect the value of the training they offer, but Defendant's website is deliberately misleading about the credentials of the program. Defendant's website states that its classes are "nationally accredited in all 50 states" and in a social media post stated that "once you complete our course you will be a Nationally Certified Phlebotomy Technician Meaning[sic] you can work in all 50 states." However, because the operation is unlicensed, state regulators have not verified that the instructors are qualified and healthcare employers will not likely see the certification as valid.

36. On information and belief, Defendant is actively scheduling courses, accepting tuition from students, and assisting students in drawing blood from live patients in an uninspected facility despite its knowledge that it must be licensed to do so legally. Defendant continually misrepresents its credentials and fails to disclose the program's lack of licensure and how it could affect the value of the training students have purchased and their employment prospects. Finally, Defendant has actively ignored regulators attempts to address Stepping Stone's illegal status.

37. Defendant's aforesaid acts, practices, representations, and omissions have been knowing and willful.

38. Defendant's aforesaid acts, practices, representations, and omissions have been in or affecting commerce in North Carolina and have had a significant and negative impact thereon.

39. Defendant's knowing and continued violation of North Carolina law shows a disregard for public health and safety. Defendant is knowingly misleading its students by failing to ensure that its training program meets state standards and gives its students marketable skills.

40. Because Defendant has operated a proprietary school without a license, consumers have suffered and will continue to suffer financial harm.

<u>CLAIM FOR RELIEF: VIOLATION OF THE UNFAIR AND DECEPTIVE TRADE</u> <u>PRACTICES ACT, N.C. GEN. STAT. §75-1.1, et seq.</u>

41. The State incorporates herein by reference all paragraphs above, and alleges further that the aforesaid acts, practices, omissions, and representations by Defendant constitute unfair and deceptive practices in violation of N.C. Gen. Stat. § 75-1.1, *et seq*.

42. Defendant's unfair and deceptive practices include, but are not limited to:

a) operating a proprietary school in the State of North Carolina without a license, as mandated by N.C. Gen. Stat. § 115D-90, *et seq.*;

b) soliciting and receiving compensation from consumers for products
 or services at an unlicensed proprietary school;

c) failing to disclose to consumers the shortcomings of its programs and how they limit the value to potential students; and

d) making false statements about prospective student's employment prospects and qualifications.

43. Additionally, by continuing to operate illegally, Defendant endangers North Carolina consumers by deceptively convincing program graduates that they are qualified to perform phlebotomy and assist in other medical tasks when they may or may not actually be qualified to do so and endanger public health and safety by allowing students to take blood samples from live patients under the supervision of an unlicensed instructor in an uninspected facility.

REQUEST FOR A TEMPORARY RESTRAINING ORDER UNDER N.C. GEN. STAT. § 75-14

As shown by this complaint and the accompanying exhibits, Defendants' deceptive and illegal practices are ongoing and continue to harm the citizens of this state. The State of North Carolina therefore requests a Temporary Restraining Order pursuant to N.C. Gen. Stat. § 75-14 so that further consumer harm and further violations of law might be prevented.

PRAYER FOR RELIEF

WHEREFORE, the State prays the Court for the following relief:

A. That the Court issue a Temporary Restraining Order pursuant to N.C. Gen. Stat. § 75-14 prohibiting Defendant, its agents, employees, and corporate successors or assigns, and any persons acting in concert with it, from:

1) operating a proprietary school in the State of North Carolina without a license, as mandated by N.C. Gen. Stat. § 115D-90, *et seq.*;

2) advertising, offering, or entering into contracts for educational or instructive products or services in North Carolina and declaring that, pursuant to N.C. Gen. Stat. § 115D-97, all contracts entered into with students or prospective students are null and avoid;

3) collecting any further payment, directly or indirectly, from consumers related to the aforementioned business;

4) destroying, transferring, concealing, altering, or removing from its possession or control any financial records, consumer contracts, emails, or other correspondence, business records, and other documents of defendants; or

5) transferring, withdrawing, concealing, or encumbering any assets of Defendant's pending further order of the Court;

B. That, upon proper notice to Defendant and within ten (10) days of the entry of the Temporary Restraining Order, a hearing be conducted to determine whether that Order, or any reasonable modification thereof, should not be continued in the form of a Preliminary Injunction pending the final adjudication of this cause, as allowed by N.C. Gen. Stat. § 75-14;

C. That Defendant be required to produce the following records no later than three (3) days prior to the Preliminary Injunction hearing or within ten (10) days of entry of a Temporary Restraining Order, whichever is sooner:

1) The name and address of every bank at which Defendant maintains, and/or in the past three years has maintained, deposit, checking, or other bank accounts, and the account number for each such account;

2) A statement of the current monetary balance in each such account held by Defendant, together with a copy of the most recent bank statement for each such account and all bank statements from the past three years for each such account; and

3) A current financial statement, showing the current assets and liabilities for Defendant;

D. That, pursuant to N.C. Gen. Stat. § 75-15.1 and § 115D-97, the Court cancel all contracts executed by Defendant, its agents, employees, and corporate successors or assigns, and any persons acting in concert with it and order Defendant to make restitution of all amounts that consumers paid in connection with said contracts;

E. That, pursuant to N.C. Gen. Stat. § 75-14, a Permanent Injunction be entered upon final adjudication of this case to prevent Defendant, its agents, employees, and corporate successors or assigns, and any persons acting in concert with it, from resuming any unfair or deceptive practices in the State;

F. That Defendant be required to pay civil penalties to the State in the amount of \$5,000.00 per violation of the Unfair and Deceptive Trade Practices Act, pursuant to N.C. Gen.

Stat. § 75-15.2, and that each week that the above alleged practices persisted be deemed a separate violation, as allowed by N.C. Gen. Stat. § 75-8, if that results in a higher penalty amount;

G. That costs and reasonable attorneys' fees be awarded to the State of North Carolina pursuant to N.C. Gen. Stat. § 75-16.1; and

H. That the Court award the State such other and further relief as may be just and proper.

This the 24th day of July, 2020.

JOSHUA H. STEIN Attorney General

By:

Matthew L. Lifes Assistant Attorney General Consumer Protection Division North Carolina Department of Justice Post Office Box 629 Raleigh, NC 27602-0629 (919) 716-6000 NC Bar No. 38315 <u>mliles@ncdoj.gov</u> File an Annual Report/Amend an Annual Report • Upload a PDF Filing • Order a Document Online •
 Add Entity to My Email Notification List • View Filings • Print a Pre-Populated Annual Report form • Print an Amended a Annual Report form

Limited Liability Company

Legal Name Stepping Stone Phlebotomy, LLC

Information

Sosid: 1600164 Status: Current-Active Date Formed: 6/6/2017 Citizenship: Domestic Annual Report Due Date: April 15th CurrentAnnual Report Status: Registered Agent: Roseborough, Damien ,

Addresses

MailingPrincipal Office218 W Broad Street Suite A218 W Broad Street Suite AStatesville, NC 28677Statesville, NC 28677

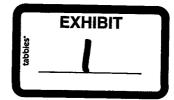
Reg Office

218 W. Broad St. Suite A Statesville, NC 28677 Statesville, NC 28677 **Reg Mailing** 218 W. Broad St. Suite A Statesville, NC 28677 Statesville, NC 28677

Company Officials

All LLCs are managed by their managers pursuant to N.C.G.S. 57D-3-20.

Chief Executive Officer Janecia Ravaye Sanders 218 W Broad St Suite A Statesville NC 28677



STATE OF NORTH CAROLINA

COUNTY OF WAKE

AFFIDAVIT OF DAVID C. EVERS

I, David C. Evers, being first duly sworn, depose and say as follows:

1. I am employed by the North Carolina Department of Justice, Consumer Protection Division ("CPD"). My official title is Consumer Protection Specialist. My duties include, but are not limited to: maintaining records of all written consumer complaints filed with the Attorney General in the subject areas assigned to me; conducting investigations of such complaints; and attempting to mediate complaints by corresponding with the business and consumers involved in the complaints.

2. I have direct knowledge of the following facts, or have conducted reasonably diligent investigation so that I believe such to be true.

3. Beginning in September 2019, after the CPD received a tip from the Office of Proprietary Schools that Stepping Stone Phlebotomy, LLC, may be operating an unlicensed proprietary school, members of our office have visited https://www.ssphlebotomy.com to gain information about the business. On July 23, 2020, I visited the same site. Attachments A through D are true and accurate representations of various pages of that website, as I observed them on that day.

4. Attachment A is a true and accurate representation of the web page that came up when I clicked on the "Certified Phlebotomy Technician (CPT)" link under the "Register Now" tab on https://www.ssphlebotomy.com as I visited it on July 23, 2020.

5. Attachment B is a true and accurate representation of the page that came up when I clicked on the "Certified Clinical Medical Assistant (CCMA)" link under the "Register Now" tab on https://www.ssphlebotomy.com as I visited it on July 23, 2020.

6. Attachment C is a true and accurate representation of the page that came up when I clicked on the "Medical Billing and Coding (CBCS)" link under the "Register Now" tab on https://www.ssphlebotomy.com as I visited it on July 23, 2020.

7. Attachment D is a true and accurate representation of the page that came up when I clicked on the "Certified EKG Technician (CET)" link under the "Register Now" tab on https://www.ssphlebotomy.com as I visited it on July 23, 2020.

8. Attachment E is a true and accurate representation of the page that came up when I clicked on the "BLS for Healthcare provider" link under the "Register Now" tab on https://www.ssphlebotomy.com as I visited it on July 23, 2020.

9. Attachment F is a true and accurate representation of the page that came up when I clicked on the "Certified Medical Administrative Assistant (CMAA)" link under the "Register Now" tab on https://www.ssphlebotomy.com as I visited it on July 23, 2020.

10. Attachment G is a true and accurate representation of the page that came up when I clicked on the "About" link on https://www.ssphlebotomy.com as I visited it on July 23, 2020.

11. From September 2019 to July 2020, members of our office visited Stepping Stone's social media profiles on Instagram (https://www.instagram.com/ssphlebotomy/ and https://www.instagram.com/stepping_stone_medical/) and Facebook

(https://www.facebook.com/SteppingStonePhlebotomy) and observed and recorded the activity contained there. Attachments H through L are true and accurate copies of screenshots from these social media profiles taken during that time and maintained in our office's investigative file.

12. Further, on July 23, 2020, I visited the "videos" tab of the Stepping Stone Medical Facebook profile located at

https://www.facebook.com/pg/SteppingStonePhlebotomy/videos/?ref=page_internal where I observed multiple videos that appear to show people performing phlebotomy procedures. For example, I watched a video located at

https://www.facebook.com/SteppingStonePhlebotomy/videos/1347232498812721/ and watched a video was posted on January 27, 2020 at 9:35 a.m., with the caption reading "The ultimate test is when the teacher sits in your chair." This 31-second long video shows a woman dressed in black scrubs inserting a needle into the arm of a woman wearing red pants, a blue sweatshirt, and blue gloves. The woman then attaches a vial to the needle, lets it fill with blood, removes the vial, attaches another vial then lets the second vial fill with blood.

20 David C. Evers Date

Sworn to and subscribed before me 2020 This the Notary Public My Commission Expires:

Attachment A



Home Class Schedule

Class Schedule

Click on a class below to begin the enrollment process:

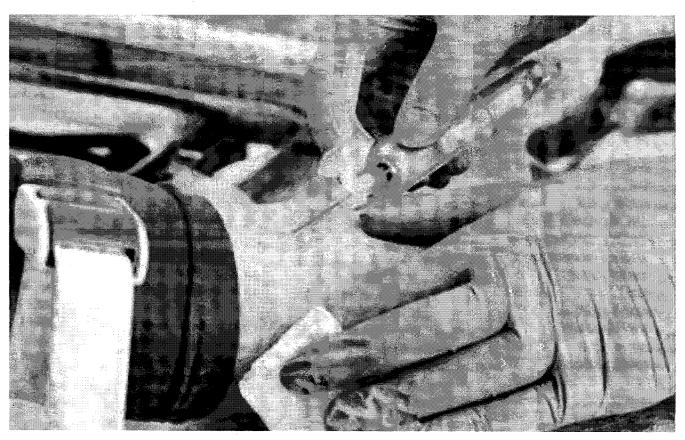
BLS for Healthcare provider

Certified Clinical Medical Assistant (CCMA)

Certified EKG Technician (CET)

Certified Medical Administrative Assistant (CMAA)

Certified Phlebotomy Technician (CPT)



COURSE DESCRIPTION This course will prepare students to: Stepping Stone Medical | CPR Classes, Medical Assistant and Phlebotomy Courses

- Draw blood from patients and blood donors
- Evaluate patients ability to understand the procedure
- Explain blood-drawing procedure to patients and answer questions
- · Perform basic point of care testing, such as blood glucose level
- · Prepare blood, urine and other specimens for testing
- Verify patient/donor identity
- · Maintain medical equipment such as needles, test tubes and blood vials

Class meets every Monday for 6 weeks or every other Saturday for 4 weeks.

Morning 10:00am - 12:00pm

Evening 6:30pm - 8:30pm

Saturday 9:00am - 12:00pm

The registration fee of \$100.00 non-refundable. The remaining \$900.00 is due on the first day of class. We except Cash, Credit, or Debit cards. *Personal checks are not accepted*.

Limited Seating & Registration:

We require students to register before the class begins. A deposit of \$100.00 is required to reserve a seat in the class. If a student elects not to attend the course the deposit is **non-refundable**.

This fee includes: A uniform shirt, National Certification Exam through National Healthcare Association (NHA) plus, 24/7 access to the online study guide to get you prepared for the National Exam. If you have any questions please do not hesitate to Contact us.

All courses are Nationally Accredited in all 50 States through (NHA) National Healthcare Association

National / Healthcareer Association[®]

Saturday, July 25, 2020 from 9:00 AM to 12:00 PM (full) Stepping Stone Medical

Monday, August 3, 2020 from 10:00 AM to 12:00 PM Stepping Stone Medical

Monday, August 3, 2020 from 6:30 PM to 8:30 PM (full) Stepping Stone Medical

Monday, September 14, 2020 from 10:00 AM to 12:00 PM Stepping Stone Medical

Monday, September 14, 2020 from 6:30 PM to 8:30 PM stepping Stone Medical

Saturday, September 19, 2020 from 9:00 AM to 12:00 PM (full) Stepping Stone Medical

Monday, October 26, 2020 from 10:00 AM to 12:00 PM Stepping Stone Medical

Monday, October 26, 2020 from 6:30 PM to 8:30 PM Stepping Stone Medical

Saturday, November 14, 2020 from 9:00 AM to 12:00 PM

Stepping Stone Medical

Monday, December 7, 2020 from 10:00 AM to 12:00 PM Stepping Stone Medical

Monday, December 7, 2020 from 6:30 PM to 8:30 PM Stepping Stone Medical

Medical Billing and Coding (CBCS)

Secure Site



Please be assured that your information is protected and secure. We value your privacy and do not provide customer information to any third parties.

Contact Us

Stepping Stone Medical 218 West Broad St Suite A Statesville, NC 28677

833-372-9253

Powered by Enrollware Online Class Scheduling and Registration Software

Home Class Schedule | Prívacy

Attachment B



Home Class Schedule

Class Schedule

Click on a class below to begin the enrollment process:

BLS for Healthcare provider

Certified Clinical Medical Assistant (CCMA)



COURSE DESCRIPTION

This course will prepare students to:

- · Check patients in and out upon arrival and departure
- Answer phone calls and questions
- Assist providers with exams and procedures
- Administer injections
- Work in the electronic health record (EHR)
- Perform EKG, phlebotomy and laboratory procedures
- Take patient vital signs

Class meets every Thursday for 4 months or every other Saturday for 4 months,

Morning 10:00am - 12:00pm

Evening 6:30pm - 8:30pm

Saturday 1:00pm - 3:00pm

The registration fee of \$100.00 is *non-refundable*. The remaining \$2900.00 is due on the first day of class. We except Cash, Credit, or Debit cards. *Personal checks are not accepted*.

Limited Seating & Registration:

We require students to register before the class begins. A deposit of \$100.00 is required to reserve a seat in the class. If a student elects not to attend the course the deposit is *non-refundable*

This fee includes: Basic life support (BLS) through the American Heart Association, a uniform shirt, National Certification Exam through National Healthcare Association (NHA) plus 24/7 access to the online study guide to get you prepared for the National Exam. If you have any questions please do not hesitate to Contact us.

All courses are Nationally Accredited in all 50 States through (NHA) National Healthcare Association



Thursday, August 20, 2020 from 10:00 AM to 12:00 PM Stepping Stone Medical

Thursday, August 20, 2020 from 6:30 PM to 8:30 PM Stepping Stone Medical

Saturday, October 3, 2020 from 1:00 PM to 3:00 PM Stepping Stone Medical

Certified EKG Technician (CET)

Certified Medical Administrative Assistant (CMAA)

Certified Phlebotomy Technician (CPT)

Medical Billing and Coding (CBCS)

Secure Site



Please be assured that your information is protected and secure. We value your privacy and do not provide customer information to any third parties.

Contact Us

Stepping Stone Medical 218 West Broad St Suite A Statesville, NC 28677 833-372-9253

Powered by Enrollware Online Class Scheduling and Registration Software

Home Class Schedule

Attachment C

Stepping Stone Medical | CPR Classes, Medical Assistant and Phlebotomy Courses



Home Class Schedule

Class Schedule

Click on a class below to begin the enrollment process:

BLS for Healthcare provider

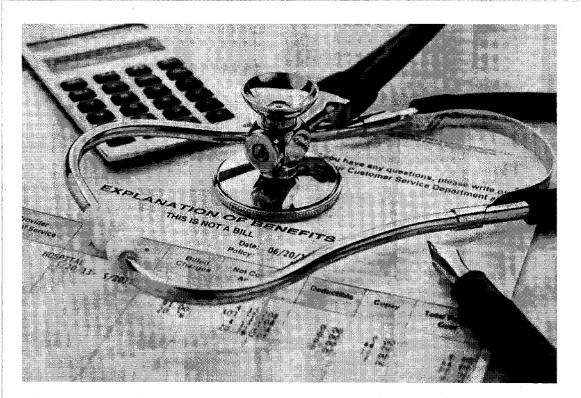
Certified Clinical Medical Assistant (CCMA)

Certified EKG Technician (CET)

Certified Medical Administrative Assistant (CMAA)

Certified Phlebotomy Technician (CPT)

Medical Billing and Coding (CBCS)



COURSE DESCRIPTION

This course will prepare students to:

Gather/review essential patient information

- Verify required documentation before patient information is released
- Prevent fraud/abuse by auditing billing
- · Assign codes for diagnosis and procedures
- Submit claims for reimbursement
- · Coach healthcare providers to achieve optimal reimbursement

Class meets every Friday for 8 weeks via zoom.

Morning 10:00am - 12:00pm

Evening 6:30pm - 8:30pm

This is an online class. Students must come in for the National exam on the last day of class

The registration fee of \$100.00 is *non-refundable*. The remaining \$2400.00 is due on the first day of class. We except Cash, Credit, or Debit cards. *Personal checks are not accepted*.

Limited Seating & Registration:

We require students to register before the class begins. A deposit of \$100.00 is required to reserve a seat in the class. If a student elects not to attend the course the deposit is **non-refundable**.

This fee includes: National Certification Exam through National Healthcare Association (NHA) plus 24/7 access to the online study guide to get you prepared for the National Exam. If you have any questions please do not hesitate to Contact us.

All courses are Nationally Accredited in all 50 States through (NHA) National Healthcare Association

National A Healthcareer Association

Friday, August 28, 2020 from 10:00 AM to 12:00 PM Stepping Stone Medical

Secure Site



Please be assured that your information is protected and secure. We value your privacy and do not provide customer information to any third parties.

Contact Us

Stepping Stone Medical 218 West Broad St Suite A Statesville, NC 28677

833-372-9253
Info@steppingstonemedical.com

Powered by Enrollware Online Class Scheduling and Registration Software

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Class Schedule

Attachment D

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Home Class Schedule

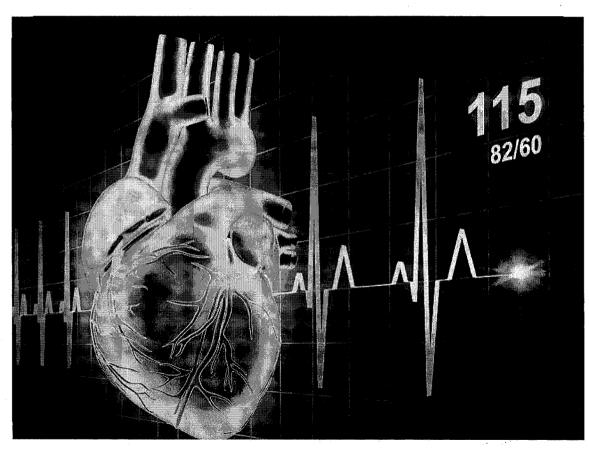
Class Schedule

Click on a class below to begin the enrollment process:

BLS for Healthcare provider

Certified Clinical Medical Assistant (CCMA)

Certified EKG Technician (CET)



COURSE DESCRIPTION

This course will prepare students to:

- Set up and administer EKGs
- (Electrocardiograms) and stress test
- Prepare patients for Holter or ambulatory monitoring
- Edit and deliver final test results to physicians for analysis
- Schedule appointments

Transcribe physicians interpretations

Class meets every Tuesday for 5 weeks or every other Saturday for 5 weeks.

Morning 10:00am - 12:00pm

Evening 6:30pm - 8:30pm

Saturday 3:30pm - 5:30pm

The registration fee of \$100.00 is *non-refundable*. The remaining \$850.00 is due on the first day of class. We except Cash, Credit, or Debit cards. *Personal checks are not accepted*.

Limited Seating & Registration:

We require students to register before the class begins. A deposit of \$100.00 is required to reserve a seat in the class. If a student elects not to attend the course the deposit is **non-refundable**.

Clicking the register button below will allow you to Register and Pay for your Stepping Stone Medical Certification Class. *This fee includes: A uniform shirt, National Certification Exam through National Healthcare Association (NHA) plus 24/7 access to the online study guide to get you prepared for the National Exam.* If you have any questions please do not hesitate to Contact us.

All courses are Nationally Accredited in all 50 States through (NHA) National Healthcare Association

National A Healthcareer Association

Tuesday, July 28, 2020 from 10:00 AM to 12:00 PM Stepping Stone Medical

Certified Medical Administrative Assistant (CMAA)

Certified Phlebotomy Technician (CPT)

Medical Billing and Coding (CBCS)

Secure Site



Please be assured that your information is protected and secure. We value your privacy and do not provide customer information to any third parties.

Contact Us

Stepping Stone Medical 218 West Broad St Suite A Statesville, NC 28677

🔝 833-372-9253 <u> Info@steppingstonemedical.com</u>

Stepping Stone Medical | CPR Classes, Medical Assistant and Phlebotomy Courses

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Home | Class Schedule | Privacy

Attachment E

Stepping Stone Medical | CPR Classes, Medical Assistant and Phlebotomy Courses



Home Class Schedule

Class Schedule

Click on a class below to begin the enrollment process:

BLS for Healthcare provider



COURSE DESCRIPTION

This course will prepare students to:

- · Learn the different signs of choking as well as the different ways of responding.
- Proper position for a victim
- What the symptoms are for cardiac arrest

The course fee of \$70.00 is non-refundable. We except Cash, Credit, or Debit cards. Personal checks are not accepted.

Limited Seating & Registration:

We require students to register before the class begins. A fee of \$70.00 is required to reserve a seat in the class. If a student elects not to attend the course this fee is non-refundable.

7/22/2020

Stepping Stone Medical | CPR Classes, Medical Assistant and Phlebotomy Courses

This fee includes: Basic life support (BLS) through American Heart Association (AHA). If you have any questions please do not hesitate to Contact us. Wednesday, July 22, 2020 from 10:00 AM to 1:00 PM Stepping Stone Medical Wednesday, July 22, 2020 from 5:00 PM to 8:00 PM Stepping Stone Medical Saturday, July 25, 2020 from 9:00 AM to 12:00 PM Stepping Stone Medical Monday, July 27, 2020 from 10:00 AM to 1:00 PM Stepping Stone Medical Monday, July 27, 2020 from 5:00 PM to 8:00 PM Stepping Stone Medical Wednesday, July 29, 2020 from 10:00 AM to 1:00 PM Stepping Stone Medical Wednesday, July 29, 2020 from 5:00 PM to 8:00 PM Stepping Stone Medical

Certified Clinical Medical Assistant (CCMA)

Certified EKG Technician (CET)

Certified Medical Administrative Assistant (CMAA)

Certified Phlebotomy Technician (CPT)

Medical Billing and Coding (CBCS)

Secure Site



Please be assured that your information is protected and secure. We value your privacy and do not provide customer information to any third parties.

Contact Us

Stepping Stone Medical 218 West Broad St Suite A Statesville, NC 28677

833-372-9253

Stepping Stone Medical | CPR Classes, Medical Assistant and Phlebotomy Courses

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Home | Class Schedule | Privacy

Attachment F



Home Class Schedule

Class Schedule

Click on a class below to begin the enrollment process:

BLS for Healthcare provider

Certified Clinical Medical Assistant (CCMA)

Certified EKG Technician (CET)

Certified Medical Administrative Assistant (CMAA)



COURSE DESCRIPTION

This course will prepare students to:

- Review and answer practice correspondence
- Operate computer systems to accomplish office task
- · Answer calls, schedule appointments, greet patients and maintain files
- Update and maintain patient and other practice-pacific information
- Coordinate operation reports such as time and attendee

Class meets every Wednesday from 10:00am - 12:00pm for 7 weeks via zoom.

This is an online class, students must come in for the National exam on the last day of class

The registration fee of \$100.00 is *non-refundable*. The remaining \$1900.00 is due on the first day of class. We except Cash, Credit, or Debit cards. *Personal checks are not accepted*.

Limited Seating & Registration:

We require students to register before the class begins. A deposit of \$100.00 is required to reserve a seat in the class. If a student elects not to attend the course the deposit is **non-refundable**.

This fee includes: National Certification Exam through National Healthcare Association (NHA) plus 24/7 access to the online study guide to get you prepared for the National Exam. If you have any questions please do not hesitate to Contact us.

All courses are Nationally Accredited in all 50 States through (NHA) National Healthcare Association

National Healthcareer Association[®]

Wednesday, September 9, 2020 from 10:00 AM to 12:00 PM Stepping Stone Medical

Certified Phlebotomy Technician (CPT)

Medical Billing and Coding (CBCS)

Secure Site



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Contact Us

Stepping Stone Medical 218 West Broad St Suite A Statesville, NC 28677

833-372-9253

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Home Class Schedule •

| Privacy

Attachment G



Home

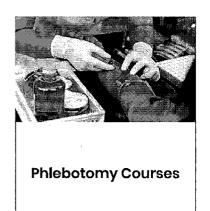
Courses About Our Students FAQs S

Shop Contact

Register Now

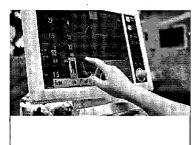


Our Courses





Medical Assistant Courses



EKG Tech Courses





Our Mission

Stepping Stone Medical's goal is to educate and provide unparalleled training in the Medical field. We strive to be your stepping stone in advancing your career or even starting a new career. We will provide a professional yet relaxed setting that will promote safety and success while building student confidence through highly qualified instruction.

About Us

At Stepping Stone Medical we have a vision for the future. A vision that has driven us to be your #1 source in Medical training. Our future vision is about producing medical professionals whose understanding of safety and



Home Courses

About Our Students

Shop Contact

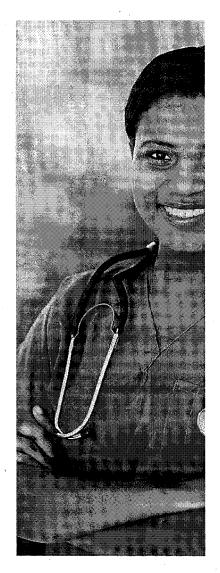
FAQs

Register Now

What Our Students Are Saying

"As an RN and Duke alumni, the quality of the training is topnotch. Value for your time and money! Highly recommended."

- Nanjala Wafula



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f 🞯

info@steppingstonemedical.com 833-372-9253

Main Office: 218 W Broad Street, Suite A, Statesville, NC 28677 (by appointment only)

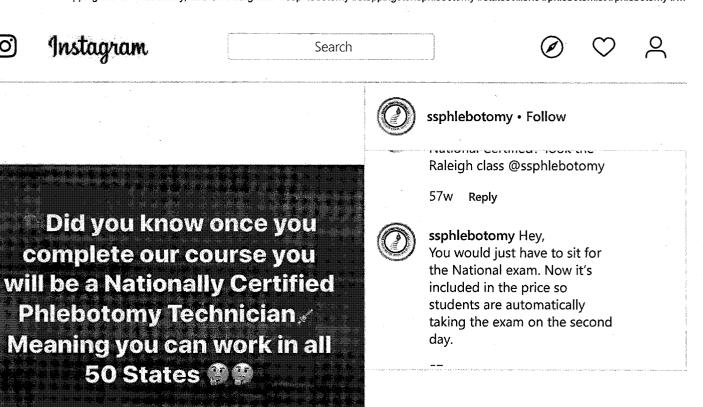


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Attachment H





39 likes **SEPTEMBER 25, 2018**

Add a comment...

Post

ABOUT US SUPPORT PRESS API JOBS PRIVACY TERMS DIRECTORY PROFILES HASHTAGS LANGUAGE

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Attachment I

E Apps 6 1315 ssphiebotomy • Follow ssphlebotomy O 41 AS OF NOVEMBER 1,2019 TUITION WILL BE AS FOLLOWS: CERTIFIED MEDICAL ASSISTANT \$2600.00 FULL TUITION INCLUDES, MEDICAL ASSISTANT KIT, 24/7 ACCESS TO THE ONLINE STUDY GUIDE THROUGH NHA, $\bigcirc \bigcirc \uparrow$ D TEE-SHIRT AND THE NATIONAL EXAM 48 views a nàn ann THROUCH NHA Log in to like or comment.

instagram.com/p/82n83pWAptS/

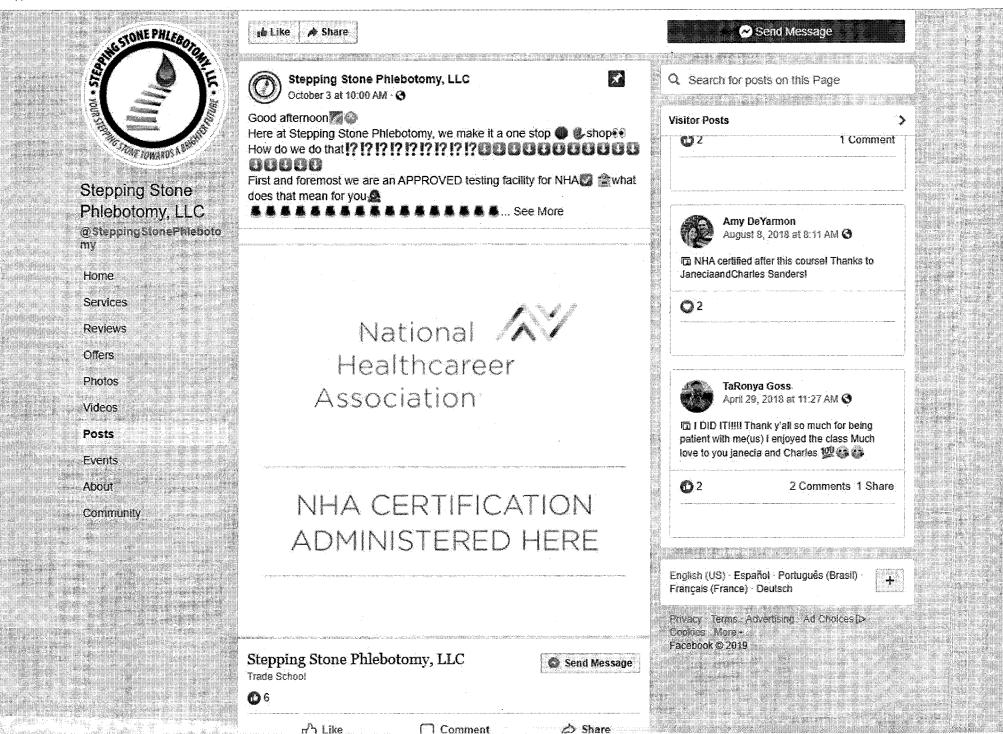
Attachment J



Attachment K

Apps

facebook.com/pg/SteppingStonePhlebotomy/posts/?ref=page_internal



Attachment L

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VING STONE ME	Like	Follow Share		Send Message	YOUR PAGES
Stepping Stone Medical					CONTACTS
					Lyle Gilmore Molineux
COMME TOWARDS & BAILS					Madison Breder
Stepping Stone Medical @SteppingStonePhleboto					Aurora Stone
my					Leslie Jo Deaderick
Home Services					Chris Lasater
Reviews	Upcoming	Events			Sufferents Sufferents Camanda Glass
Photos	FEB	Nationally Accredited Phlebotomy Certificati	Stepping Stone Phlebotomy,		Chad Brown
Videos Posts	1	Sat 10 AM · 1 guest	· · · · · · · · · · · · · · · · · · ·	Get Tickets	Jennifer Ghafoori
Events	1	Nationally Certified Medical Assistant Course Sat 1 PM - 2 guests	Stepping Stone Medical Statesville, NC	Get Tickets	Lifetzy Sipes
About Community		Nationally Accredited Phlebotomy Certificati	Stepping Stone Medical Statesville, NC	Get Tickets	Chris Santana
Create a Page	FER	Nationally Accredited Phlebotomy Certificati		,	Joshua Sanford
	10	Mon 6:30 PM	Stepping Stone Medical Statesville, NC	Get Tickets	David A. Price
		Nationally Certified Medical Assistant Course Tue 10 AM	Stepping Stone Medical Statesville, NC	Get Tickets	OROUP CONVERSATIONS Interested Create New Group
	21	Nationally Certified Medical Assistant Course Tue 6:30 PM - 2 guests	Stepping Stone Phiebotomy,	Get Tickets	MORE CONTACTS (48)
	Past Event	S			Alexa Linham
	jan 6	Nationally Accredited Phlebotomy Certificati Mon 6:30 PM - Hosted by Stepping Stone Medical	Stepping Stone Phlebotomy,		
	jan 6	Nationally Accredited Phlebotomy Certificati Mon 10 AM - 3 guests	Stepping Stone Phiebotomy,		
	dec 7	Nationally Accredited Phlebotomy Certificati Sat 9 AM - 5 guests	Stepping Stone Phlebotomy,		
	DEC 2	Nationally Accredited Phlebotomy Certificati Mon 6:30 PM - Hosted by Stepping Stone Medical	Stepping Stone Phlebotomy,		
	DEC 2	Nationally Accredited Phlebotomy Certificati Mon 10 AM - 2 guests	Stepping Stone Phiebotomy,		
	NOV 5	Nationally Certified Medical Assisting Course Tue 6:30 PM · 3 guests	Stepping Stone Phlebotomy,		
	NOV 4	Nationally Accredited Phlebotomy Certificati Mon 6:30 PM - Hosled by Stepping Stone Medical	Stepping Stone Phlebotomy,		
	NOV 4	Nationally Accredited Phlebotomy Certificati Mon 10 AM - Hosted by Stepping Stone Medical	Stepping Stone Phlebotomy		
		Accredited Phlebotomy Certification	Stepping Stone Medical		Search

OCT	Sat 8 AM · 6 guests	Statesville, NC		
26				
			YOUR PAGES	
sep 30	Nationally Accredited Phlebotomy Certificati Mon 6:30 PM • 2 guests	Stepping Stone Phlebotomy,	3 677 .	perty Law Associ
SEP			CONTACTS	
14	Accredited Phlebotomy Certification Sat 8 AM - 3 guests	Stepping Stone Medical Statesville, NC		ore Molineux
SEP	Nationally Accredited Phlebotomy Certificati	Stepping Stone Medical	Madison	Breder
2	Sep 2, 2019 - Sep 16, 2019 - 1 guest	Statesville, NC	🕢 Edna Ro	shandel
AUG	Accredited Phlebotomy Certification	Stepping Stone Medical	Aurora S	tone
5	Mon 6:30 PM · 2 guests	Statesville, NC		Deaderick
AUG			Leslie Jo	Deadenck
3	Accredited Phlebotomy Certification Sat 8 AM - 4 guests	Stepping Stone Medical Statesville, NC	Chris La	ater
-	Gat 6 Ally - 4 guests	olacesvine, NO	Julie Gre	lohunos
JUL	Accredited Phlebotomy Certification	Stepping Stone Medical		Kilulius
8	Mon 6:30 PM · 3 guests	Statesville, NC	Amanda	Glass
JUN			Chad Bro	
15	Accredited Phlebotomy Certification	Stepping Stone Medical		
	Sat 8 AM · 2 guests	Statesville, NC	Jennifer	Ghafoori
JUN	Accredited Phlebotomy Certification	Stepping Stone Medical	Maizy Si	
10	Mon 6:30 PM - 3 guests	Statesville, NC	Wildarzy Ol	<i>7</i> 23
14434			Chris Sa	ntana
мау 21	Accredited Phlebotomy Certification	Stepping Stone Medical	Mai Vang	
<u> </u>	May 21, 2019 - May 30, 2019 · 3 guests	Statesville, NC		
MAY	Accredited Phlebotomy Certification	Stepping Stone Medical	Joshua S	anford
18	May 18, 2019 - May 19, 2019 - 8 guests	Statesville, NC	David A.	Price
MAY			v	
7	Accredited Phlebotomy Certification	Stepping Slone Medical	GROUP CONVER	SATIONS
•	May 7, 2019 - May 16, 2019 - 2 guests	Statesville, NC	Create N	lew Group
MAY	Accredited Phlebotomy Certification	Stepping Stone Medical	MORE CONTACT	S (48)
4	May 4, 2019 - May 5, 2019 - 7 guests	Statesville, NC		
APR				nam
23	Accredited Phlebotomy Certification	Stepping Stone Medical		
~~~	Apr 23, 2019 - May 2, 2019 - 1 guest	Statesville, NC	***	
APR	Nationally Accredited Phlebotomy Certificati	Stepping Stone Medical		
20	Apr 20, 2019 - Apr 21, 2019 - 12 guests	Statesville, NC		
APR				
9	Accredited Phlebotomy Certification	Stepping Stone Medical Statesville, NC		
Ũ	Apr 9, 2019 - Apr 18, 2019 - 5 guests	Statesville, NC		
APR	Nationally Accredited Phlebotomy Certificati	Stepping Stone Medical		
6	Apr 6, 2019 - Apr 7, 2019 - 9 guests	Statesville, NC		
MAR				
23	Accredited Phlebotomy Certification	Stepping Stone Medical		
	Mar 23, 2019 - Mar 24, 2019 · 16 guests	Statesville, NC		
MAR	Accredited Phlebotomy Certification	Stepping Stone Medical		
9	Mar 9, 2019 - Mar 10, 2019 · 17 guesis	Statesville, NC		
FEB				
23	Accredited Phlebotomy Certification	Stepping Stone Medical	÷	
	Feb 23, 2019 - Feb 24, 2019 · 11 guests	Statesville, NC		
FEB	Accredited Phlebotomy Certification	Stepping Stone Medical		
9	Feb 9, 2019 - Feb 10, 2019	Statesville, NC		
JAN				
26	Accredited Phlebotomy Certification Sat 9 AM - 5 guests	Stepping Stone Medical Statesville, NC		
-1				
•	Accredited Phlebotomy Certification	Stepping Stone Medical	Search	

JAN 12	Jan 12, 2019 - Jan 13, 2019 - 5 guests	Statesville, NC
DEC	Accredited Phlebotomy Certification	Stepping Stone Medical
29	Dec 29, 2018 - Dec 30, 2018 - 2 guests	Statesville, NC
dec	Accredited Phlebotomy Certification	Stepping Stone Medical
15	Dec 15, 2018 - Dec 16, 2018 · 4 guests	Statesville, NC
DEC	Accredited Phlebotomy Certification	Stepping Stone Medical
1	Dec 1, 2018 - Dec 2, 2018 · 3 guests	Statesville, NC
NOV	Accredited Phlebotomy Certification Course	Charlotte, North Carolina
17	Nov 17, 2018 - Nov 18, 2018 - 3 guests	Charlotte, NC
NOV	1 Day Accredited BLS class	Stepping Stone Medical
10	Sat 9 AM · 3 guests	Statesville, NC
NOV	Accredited Phlebotomy Certification	Stepping Stone Medical
5	Nov 5, 2018 - Nov 14, 2018 - 1 guest	Statesville, NC
NOV	Accredited Phlebotomy Certification Course	Stepping Stone Medical
3	Nov 3, 2018 - Nov 4, 2018 - 2 guests	Statesville, NC
ост	Accredited Phlebotomy Certification Course	Boone, North Carolina
27	Oct 27, 2018 - Oct 28, 2018 · 8 guests	Boone, NC
ост	Accredited Phlebotomy Certification Course	Stepping Stone Medical
<b>24</b>	Oct 24, 2018 - Oct 25, 2018 · 10 guests	Statesville, NC
ост	BLS Accredited by AHA	Stepping Stone Medical
<b>13</b>	Sat 9 AM	Statesville, NC
ост	Phiebotomy Certification Course	Stepping Stone Medicat
10	Oct 10, 2016 - Oct 11, 2018 - 7 guests	Statesville, NC
ост	Phlebotomy Certification Course	Raleigh, North Carolina
6	Oct 6. 2018 - Oct 7, 2018 · 12 guests	Raleigh, NC
sep 26	Phlebotomy Certification Course Sep 26, 2018 - Sep 27, 2018 · 6 guests	Stepping Stone Medical Statesville, NC
sep	Phiebotomy Certification Course	Raleigh, North Carolina
22	Sep 22, 2018 - Sep 23, 2018 · 8 guests	Raleigh, NC
SEP	Phiebotomy Certification Course	Stepping Stone Medical
8	Sep 8, 2018 - Sep 9, 2018 - 11 guesis	Statesville, NC
AUG	Phlebotomy Certification Course	Stepping Stone Medical
22	Aug 22, 2018 - Aug 23, 2018 · 3 guests	Statesville, NC
^{AUG}	Phlebotomy Certification Course Aug 18, 2018 - Aug 19, 2018 - 14 guests	2310 Greenville Blvd NE
^{AUG}	Phlebotomy Certification Course Aug 1, 2018 - Aug 2, 2016 - 8 guests	Stepping Stone Medical Statesville, NC
JUL <b>14</b>	2 Day Philebotomy Certification Course Jul 14, 2018 - Jul 15, 2018 - 51 guests	, Holiday Inn Asheville - Biltmo, Asheville, NC
JUN	2 Day Phlebotomy Certification Course	Holiday Inn Wilmington-Mark
23	Jun 23, 2018 - Jun 24, 2018 - 153 guests	Wilmington, NC
JUN 9	2 Day Phlebotomy Certification Course Jun 9, 2018 - Jun 10, 2018 - 130 guests	Charlotte NC
	2 Day Phlebotomy Certification Course	La Quinta Inn & Suites Gree

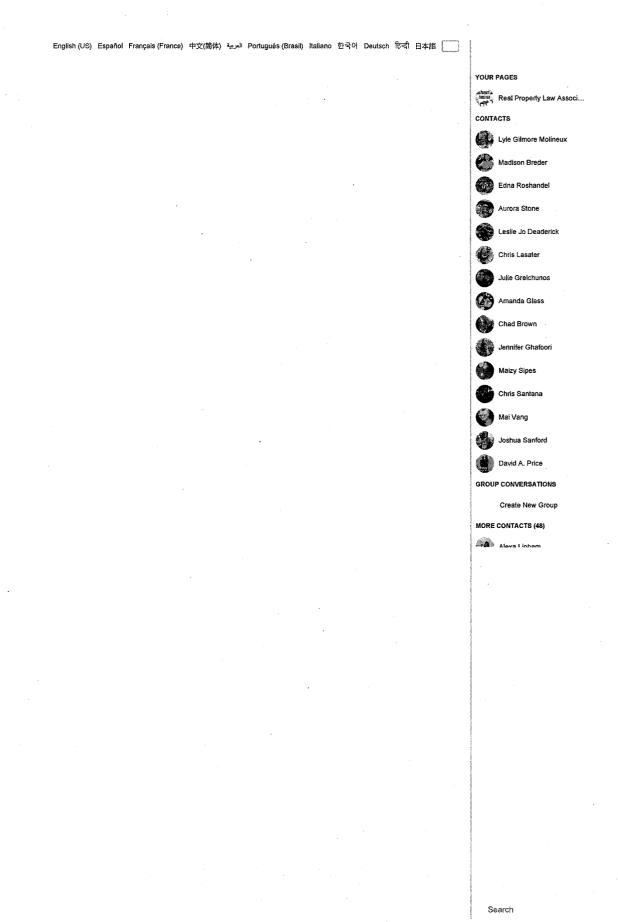


Search

мау 26	May 26, 2018 - May 27, 2018 - 40 guests	Greensboro, NC	
£ U			YOUR PAGES
MAY	2 Day Phlebotomy Certification Course	Fayettville NC	
12	May 12, 2018 - May 13, 2018 · 21 guests	· · · · · · · · · · · · · · · · · · ·	athenia Security Real Property Law Asso
APR			CONTACTS
28	2 Day Phiebotomy Certification Course Apr 28, 2018 - Apr 29, 2018 - 27 guests	Holiday Inn Raleigh North Raleigh, NC	Lyle Gilmore Molineux
100			Madison Breder
APR 14	2 Day Accredited Phlebotomy Certification	New Haven CT	Ä
	Apr 14, 2018 - Apr 15, 2018 · 113 guests		Edna Roshandel
MAR	2 Day Accredited Phlebotomy Certification	Quality Inn & Suites Civic Ce	Aurora Stone
31	Mar 31, 2018 - Apr 1, 2018 · 89 guests	Florence, SC	Leslie Jo Deaderick
MAR	2 Days A pays dited Dislands my Contification		
17	2 Day Accredited Phlebotomy Certification Mar 17, 2018 - Mar 18, 2018 · 25 guests	Holiday Inn Express & Suites Rockingham, NC	Chris Lasater
			Julie Greichunos
MAR 3	2 Day Accredited Phlebotomy Certification	Quality Inn & Suite Airpark E	
0	Mar 3, 2018 - Mar 4, 2018 - 34 guests	Greensboro, NC	Amanda Glass
FEB	2 Day Phlebotomy Certification Course	Greensboro NC	Chad Brown
19	Mon 2 PM · Hosted by Stepping Stone Medical		Jennifer Ghafoori
FEB			
17	2 Day Accredited Phlebotomy Certification Feb 17, 2018 - Feb 18, 2018 - 237 guests	Sleep Inn Lake Wright - Norf Norfolk, VA	Maizy Sipes
			Chris Santana
^{гев} 10	2 Day Accredited Phlebotomy Certification	Ramada Plaza Fayetleville F	
iU	Feb 10, 2018 - Feb 11, 2018 · 92 guests	Fayetleville, NC	Mai Vang
FEB	2 Day Accredited Phlebotomy Certification	Holiday Inn Asheville - Biltmo	Joshua Sanford
3	Feb 3, 2018 - Feb 4, 2018 · 38 guests	Asheville, NC	David A. Price
JAN			<b>*</b>
20	2 Day Accredited Phlebotomy Certification Jan 20, 2018 - Jan 21, 2018 - 95 guests	Comfort inn Asheboro, NC	GROUP CONVERSATIONS
			Create New Group
JAN 6	2 Day Accredited Phlebotomy Certification	Holiday Inn Wilmington-Mark	MORE CONTACTS (48)
6	Jan 6, 2018 - Jan 7, 2018 · 124 guests	Wilmington, NC	Alava Linham
DEC	2 Day Accredited Phlebotomy Certification	Holiday Inn Express & Suites	
9	Dec 9, 2017 - Dec 10, 2017 · 134 guests	Durham, NC	
DEC			
2	2 Day Accredited Phlebotomy Certification Dec 2, 2017 - Dec 3, 2017 - 401 guests	Fairfield Inn Lumberton Lumberton, NC	
NOV 18	2 Day Accredited Phlebotomy Certification	Gastonia, North Carolina	
10	Nov 18, 2017 - Nov 19, 2017 - 813 guests	Gastonia, NC	
NOV	2 Day Accredited Phlebotomy Certification	Holiday Inn Wilmington-Mark	
11	Nov 11, 2017 - Nov 12, 2017 · 1,177 guests	Wilmington, NC	
NOV	·		
4	2 Day Accredited Phlebotomy Certification Nov 4, 2017 - Nov 5, 2017 - 99 guests	Holiday Inn Asheville - Billmo Asheville, NC	
ост 7	2 Day Accredited Phlebotomy Certification	Quality Inn Raleigh Near Wal	
1	Oct.7, 2017 - Oct 8, 2017 - 60 guests	Raleigh, NC	
SEP	2 Day Accredited Phlebotomy Certification	Hampton Inn & Suites Durha	
16	Sat 8 AM · 40 guests	Durham, NC	
SEP	2 day accredited phiebotomy certification c	Hampton Inn Statesville	
sep 9	Sat 8 AM · 107 guests	Statesville, NC	

Search

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### STATE OF NORTH CAROLINA

#### COUNTY OF WAKE

### AFFIDAVIT OF RASHEEDA McCORMICK

I, Rasheeda McCormick, being first duly sworn, depose and say as follows:

1. I am employed by the North Carolina Community College System, Office of Proprietary Schools ("OPS"). My official title is Program Auditor. I serve the North Carolina State Board of Proprietary Schools ("NCBOPS") and perform audits of the licensing and regulation of proprietary schools in North Carolina. As defined by N.C. Gen. Stat. § 115D-87(b), proprietary schools are for-profit entities that offer vocational instruction that does not result in a degree.

2. I have direct knowledge of the following facts, or have conducted a reasonably diligent investigation – including, but not limited to, searches of OPS records - so that I believe such to be true.

3. On January 26, 2018, my supervisor, Executive Director Scott Corl, received an email from Ms. Lane Goodwin of South Carolina's Commission on Higher Education stating that Stepping Stone Phlebotomy had been reported in South Carolina for operating without a license. Ms. Goodwin explained that she was contacting OPS to see if the school was also in operating in North Carolina and whether North Carolina law required this type of school to be licensed. Mr. Corl informed Ms. Goodwin that North Carolina does require a license for a phlebotomy school and according to our office records, Stepping Stone did not have a license. A true and accurate copy of the January 26, 2018 email, and the responses there to, are included herein as Attachment A.

1

EXHIBIT 3 4. After receiving this email, Mr. Corl instructed me to contact Janecia Sanders regarding Stepping Stone's licensure. I spoke with Ms. Sanders by phone on February 5, 2018. At first, Ms. Sanders's tone was slightly defensive. She said she did not understand why her school would need a license when phlebotomy is an "unregulated industry." I clarified to Ms. Sanders that even if the state did not require a license to perform the job, the school still had to be licensed if it met the requirements of a proprietary school. I instructed her to fill out the preliminary application so we could determine if the school needed a license or should be exempt. After some discussion, Ms. Sanders eventually agreed that she would complete the preliminary application.

5. Later that same day, I sent Ms. Sanders an email reiterating the requirement that Stepping Stone fill out the preliminary application and provided a link to the application. A true and accurate copy of the February 5, 2018, email is included herein as Attachment B.

6. On February 28, 2018, Mr. Corl received an email from Christon Kurker-Stewart at Connecticut's Office of Higher Education stating that Stepping Stone Phlebotomy had been reported again, this time in Connecticut. Mr. Kurker-Stewart wanted to know if OPS had a way to get in touch with Janecia Sanders, as their attempts at contact had been unsuccessful. A true and accurate copy of the February 28, 2018 email is included herein as Attachment C.

7. On March 5, 2018, I sent Ms. Sanders another email, again reiterating the requirement that Stepping Stone apply for a license and notifying Ms. Sanders that if our office did not receive her application, we would report Stepping Stone to the Attorney General. A true and accurate copy of the March 5, 2018 email is included in Attachment B.

8. On September 23, 2019, over a year and a half since I had told Ms. Sanders that she needed to file a preliminary application, I confirmed that Stepping Stone had still not

2

submitted an application and confirmed that they still appeared to be in business. Following this confirmation, I reported Stepping Stone to the Attorney General's Office.

9. To my knowledge, no one with OPS has spoken directly with Ms. Sanders since my phone conversation with her on February 5, 2018.

Quet 7/17/20 Date aduer Rasheeda McCormick

Sworn to and subscribed before me

This the  $\square$  day of  $\square$ , 2020 Notary Public

My Commission Expires: 22623



# Attachment A

### Gardner, David

From: Sent: To: Cc: Subject: Scott Corl <corls@nccommunitycolleges.edu> Tuesday, September 24, 2019 1:41 PM Liles, Matthew Scott Corl FW: Stepping Stone Phlebotomy Training

Matt,

See below on history of how this school got on our radar.

Regards,

Scott Corl Executive Director Office of Proprietary Schools NC Community College System Phone: 919-807-7061 Fax: 919-807-7169 corls@nccommunitycolleges.edu



E-mail correspondence to and from this address may be subject to the North Carolina Public Records Act and shall be disclosed to third parties when required by Chapter 132 of the North Carolina General Statutes.

From: Scott Corl Sent: Monday, January 29, 2018 2:14 PM To: Goodwin, Lane <lgoodwin@che.sc.gov> Cc: Scott Corl <corls@nccommunitycolleges.edu> Subject: RE: Stepping Stone Phlebotomy Training

Ask them to show you a license exemption from our office.

Regards,

Scott Corl Executive Director Office of Proprietary Schools NC Community College System Phone: 919-807-7061 Fax: 919-807-7169 corls@nccommunitycolleges.edu

## NC COMMUNITY COLLEGES

### **DNE TEAM WITH ONE VOICE... SERVING 58.**

### ACCOUNTABILITY II INTEGRITY II COLLABORATION II SERVICE

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Act and shall be disclosed to third parties when required by Chapter 132 of the North Carolina General Statutes.

From: Goodwin, Lane [mailto:lgoodwin@che.sc.gov] Sent: Monday, January 29, 2018 2:03 PM To: Scott Corl <<u>corls@nccommunitycolleges.edu</u>> Subject: RE: Stepping Stone Phlebotomy Training

Scott, is this the kind of training that is subject to licensure in NC? They told my colleague that they didn't understand why they would have to be licensed in SC, because they aren't required to "do anything" in NC. Mm hmm.

Ms. Lane Goodwin, Program Manager Academic Affairs, Postsecondary Institution Licensing SC Commission on Higher Education 1122 Lady St., Ste. 300 Columbia, SC 29201 (803) 737-3918 Igoodwin@che.sc.gov

From: Scott Corl [mailto:corls@nccommunitycolleges.edu] Sent: Saturday, January 27, 2018 11:09 PM To: Goodwin, Lane <<u>lgoodwin@che.sc.gov</u>> Cc: Rosa-Casanova, Sylvia (SCHEV) <<u>sylviarosacasanova@schev.edu</u>>; <u>bmitchell@ctohe.org</u>; Simons, Peggy <<u>psimons@che.sc.gov</u>>; Scott Corl <<u>corls@nccommunitycolleges.edu</u>> Subject: Re: Stepping Stone Phlebotomy Training

Thanks for letting me know about this business. They are not licensed in NC.

Get Outlook for iOS

From: Goodwin, Lane <<u>lgoodwin@che.sc.gov</u>> Sent: Friday, January 26, 2018 2:03:06 PM To: Scott Corl Cc: Rosa-Casanova, Sylvia (SCHEV); <u>bmitchell@ctohe.org</u>; Simons, Peggy Subject: Stepping Stone Phlebotomy Training Scott, is Stepping Stone phlebotomy licensed to offer programs in NC? Another school brought to our attention that they are advertising for a two-day class in Florence, SC, and the way the program is described, it is subject to licensure. I'm including Brian and Sylvia because there are also classes scheduled in CT and VA: <a href="http://www.ssphlebotomy.com/class-registration/">http://www.ssphlebotomy.com/class-registration/</a>

Thanks!

Ms. Lane Goodwin, Program Manager Academic Affairs, Postsecondary Institution Licensing SC Commission on Higher Education 1122 Lady St., Ste. 300 Columbia, SC 29201 (803) 737-3918 Igoodwin@che.sc.gov



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Attachment B

### Gardner, David

From: Sent: To: Cc: Subject: Scott Corl <corls@nccommunitycolleges.edu> Tuesday, September 24, 2019 1:47 PM Liles, Matthew Scott Corl FW: Proprietary School License Information

See below on Stepping Stone....

Regards,

Scott Corl Executive Director Office of Proprietary Schools NC Community College System Phone: 919-807-7061 Fax: 919-807-7169 corls@nccommunitycolleges.edu



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From: Rasheeda McCormick <mcallisterr@nccommunitycolleges.edu> Sent: Monday, September 23, 2019 1:39 PM To: Scott Corl <corls@nccommunitycolleges.edu> Subject: Fw: Proprietary School License Information

I don't think I ever received anything from them. Here is an email from 2018. There are also some other emails between you and Lane Goodwin, discussing this business.

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Rasheeda McCormick

**Program Auditor** 

Office of Proprietary Schools

North Carolina Community College System

5001 Mail Service Center

Raleigh, NC 27699-5001

Ph: 919-807-7149

Fax: 919-807-7169

mcallisterr@nccommunitycolleges.edu

From: Rasheeda McAllister Sent: Monday, March 5, 2018 8:15 AM To: <u>ravaye85@yahoo.com</u> <<u>ravaye85@yahoo.com</u>> Cc: Scott Corl <<u>corls@nccommunitycolleges.edu</u>> Subject: Re: Proprietary School License Information

Good morning Ms. Sanders,

I wanted to follow up with you regarding the preliminary application for Stepping Stone Phlebotomy. We spoke by phone on Feb. 5th regarding your business and the guidelines pertaining to licensing. At that time, we agreed that I would email you the link to our website so that you could complete and submit the preliminary application to our office; in order to determine whether or not your business falls under the licensing guidelines. That email was also sent on Feb. 5th. As of today, we have not received a preliminary application from you. What is the status of this? If our office does not hear from you, we will be forwarding your contact information to the North Carolina Attorney Generals' Office for further investigation.

Regards,

Rasheeda McAllister

**Program Auditor** 

Office of Proprietary Schools

North Carolina Community College System

5001 Mail Service Center

Raleigh, NC 27699-5001

Ph: 919-807-7149

Fax: 919-807-7169

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From: Rasheeda McAllister Sent: Monday, February 5, 2018 12:35 PM To: <u>ravaye85@yahoo.com</u> Subject: Proprietary School License Information

Good day Ms. Sanders,

Thank you for speaking with our office today regarding Proprietary School Licensure. Here is a link to our webpage: <u>http://www.nccommunitycolleges.edu/proprietary-schools</u>; where you can read the information regarding the Statute and Rules pertaining to school license.

The first step in the process is to complete a preliminary application, which can be found on our website under the heading *Potential Owners*. If you have any questions regarding the information on the website or the preliminary application, please feel free to contact us.

Regards,

Rasheeda McAllister, MBA

**Program Auditor** 

Office of Proprietary Schools

North Carolina Community College System

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Ph: 919-807-7149

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mcallisterr@nccommunitycolleges.edu



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# Attachment C

### Gardner, David

From:	Scott Corl <corls@nccommunitycolleges.edu></corls@nccommunitycolleges.edu>
Sent:	Tuesday, September 24, 2019 1:44 PM
То:	 Liles, Matthew
Cc:	Scott Corl
Subject:	FW: Unauthorized Proprietary School - Stepping Stone Phlebotomy, LLC

More info from another state....

Regards,

Scott Corl Executive Director Office of Proprietary Schools NC Community College System Phone: 919-807-7061 Fax: 919-807-7169 corls@nccommunitycolleges.edu



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#### From: Scott Corl

Sent: Thursday, March 1, 2018 9:45 AM

To: Christon Kurker-Stewart <ckurker-stewart@ctohe.org>

**Cc:** Andresen, Chris <Chris.Andresen@ct.gov>; Goodwin, Lane <lgoodwin@che.sc.gov>; Scott Corl <corls@nccommunitycolleges.edu>

Subject: RE: Unauthorized Proprietary School - Stepping Stone Phlebotomy, LLC

#### Christon,

Thank you for contacting me. We also received an inquiry from SC at the beginning of February. It is my understanding they told SC they didn't understand why they would have to be licensed in SC, because they weren't required to "do anything" in NC (not sure if Lane has any additional information to add at this time). They are not licensed in NC for the programs they are apparently offering. Our office contacted them at the beginning of February, but to my knowledge we have not received anything from them. We will be forwarding their contact information to the NC AG's Office for non-compliance.

#### Regards,

Scott Corl Executive Director Office of Proprietary Schools NC Community College System Phone: 919-807-7061 Fax: 919-807-7169 corls@nccommunitycolleges.edu

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From: Christon Kurker-Stewart [mailto:ckurker-stewart@ctohe.org]
Sent: Wednesday, February 28, 2018 1:32 PM
To: Scott Corl <<u>corls@nccommunitycolleges.edu</u>>
Cc: Andresen, Chris <<u>Chris.Andresen@ct.gov</u>>
Subject: Unauthorized Proprietary School - Stepping Stone Phlebotomy, LLC

Good afternoon,

Our office received a complaint about <u>Stepping Stone Phlebotomy, LLC</u>, an apparent postsecondary school with a P.O. Box in Scotts, North Carolina. On their website, they advertise a number of trainings at third-party locations. Though nearly all of the posted training takes place in North (or South) Carolina, there is a date set in April for Waterbury, Connecticut. Our attempts to contact the company have been rebuffed and/or ignored, and I am wondering if your office has had any interaction with this entity. I do not see them on your approved list and would appreciate any information you can provide. Thank you.

Christon R. Kurker-Stewart, Esq. Academic Affairs Office of Higher Education State of Connecticut 450 Columbus Boulevard, Suite 510 Hartford, CT 06103-1841 Telephone: (860) 947-1820 Fax: (860) 947-1310 www.ctohe.org