

however, Defendants failed to provide Dash Radosti with a ticket or access to witness the inauguration, failed to provide a ticket or access to watch the inaugural parade, and failed to provide a ticket to an official Black Tie Gala Inaugural Ball. Plaintiffs would not have spent the significant sums of money they did to participate in the Junior Presidential Youth Inaugural Conference had Defendants disclosed the true nature of the program. Thus, Plaintiffs have been injured as a result of Defendants' breaches, acts and/or omissions.

3. Plaintiff Joshua Rottman is of majority age and a junior in college attending University of California Davis. Plaintiff Rottman is a citizen and resident of California.

4. In reliance on Defendants' promotional materials, Joshua Rottman paid significant sums of money to attend the University Presidential Inaugural Conference for Barack Obama in Washington, DC in January 2009, including tuition and related expenses, such as travel. The conference promoted and promised a wide range of scheduled inaugural activities to the college students who chose to attend it. In breach of their explicit and implicit promises, however, Defendants failed to provide Joshua Rottman with a ticket or access to witness the inauguration, failed to provide a ticket or access to watch the inaugural parade, and failed to provide a ticket to an official Black Tie Gala Inaugural Ball. Mr. Rottman would not have spent the significant sums of money he did to participate in the University Presidential Inaugural Conference had Defendants disclosed the true nature of the program. Thus, Mr. Rottman has been injured as a result of Defendants' breaches, acts and/or omissions.

5. Defendant Envision EMI, LLC ("Envision") is a limited liability corporation organized under the laws of the State of Delaware maintaining its principal place of business at 1110 Vermont Avenue N.W. #300, Washington, D.C. 20005. Envision EMI, LLC is the parent company of Defendant Congressional Youth Leadership Council.

6. The Congressional Youth Leadership Council (referred to herein as “CYLC”), while presently registered in Washington, DC as a non-profit corporation, is in actuality a for-profit corporation since it was purchased in 2007 by Defendant Envision. CYLC maintains offices at 1919 Gallows Road, Suite 700, Vienna, Virginia 22182. CYLC also refers to itself as Global Youth Counsel.

7. Upon information and belief, at all times mentioned herein, Defendant CYLC was the alter ego of Envision, shared key employees, had integrated systems, and Envision exercised strict control over CYLC’s activities as discussed herein. Alternatively, Defendants were acting in concert with one another and were the agents, servants, partners, aiders and abettors, co-conspirators and/or joint venturers of each and rendered substantial assistance and encouragement to one another, knowing that their collective conduct constituted a breach of duty owed to Plaintiffs and Class Members.

II. JURISDICTION

8. This Court has diversity jurisdiction over the claims asserted herein on behalf of this proposed nationwide class pursuant to 28 U.S.C. § 1332, as amended by the Class Action Fairness Act (“CAFA”). Jurisdiction is proper because (a) the amount in controversy in this class action exceeds five million dollars, exclusive of interest and costs; and (b) there is diversity of citizenship between Plaintiffs, Class Members, and Defendants.

III. VENUE

9. Venue is proper pursuant to 28 U.S.C. § 1391(a) as the Defendants reside within or do business within the geographic jurisdiction of the Court and the acts and omissions complained of herein occurred in this District.

IV. CHOICE OF LAW

10. Defendant Envision EMI LLC maintains its principal place of business in Washington, DC.

11. Defendant CYLC is incorporated under the laws of Washington, DC.

12. Upon information and belief, a substantial portion of Defendants' deceptive acts and omissions, as discussed further herein, were orchestrated and implemented in Washington, DC.

13. As set forth in more detail below, the contract which Plaintiffs entered into with Defendants and which Defendants materially breached, was meant to be substantially performed in, and was breached in, Washington, DC - the site of the 2009 presidential inauguration.

14. As set forth in more detail below, a substantial part of the underlying events and omissions occurred in Washington, DC.

15. The District of Columbia, which seeks to protect the rights and interests of individuals when such rights are violated by companies registered in and doing business in the District, and which also seeks to promote tourism within the District, has the most significant interest in the claims of Plaintiffs and the Class Members of any other State.

16. Application of District of Columbia law with respect to Plaintiffs' and the Class Members' claims is neither arbitrary nor fundamentally unfair because the District has a significant aggregation of contacts that create a state interest in the claims of the Plaintiffs and the Nationwide Class.

V. FACTUAL ALLEGATIONS

A. CYLC and Envision

17. Defendant CYLC advertises itself as an "independent, educational organization with members of the U.S. Senate and House of Representatives on its honorary, bipartisan

advisor board.”

18. CYLC’s website states: “The Congressional Youth Leadership Council (CYLC) offers educational leadership conferences for an elite group of outstanding young people from across the country and around the world, whose nomination provides them with unmatched enrichment opportunities in a distinguished academic environment. Our programs are designed to inspire outstanding youth to reach their full leadership potential while experiencing the nation and the world from a perspective unlike any other.”

19. Prior to 2007, CYLC was a non-profit corporation. In 2006, CYLC grossed \$56 million tax-free, more than double its revenues in 2002.

20. In order to find students to solicit to attend its expensive and allegedly exclusive “educational programs,” CYLC solicits recommendations from teachers and alumni of previous conferences, and it culls names from mailing lists (for which the council paid \$263,000 in 2006 alone, according to its last filing with the Internal Revenue Service).

21. Envision managed CYLC’s programs until 2007 when it purchased CYLC outright.

22. While the CYLC’s stated goals are educational, Envision abandoned this goal and replaced it with a goal of profit -- a vision statement adopted after the events of September 11, 2001, called for Envision to increase profits tenfold within eight years:

An organization’s vision is a clear concise picture of where it intends to be and what it plans to achieve in the future. At Envision, our vision is a simple financial measurement... growing our profit ten times in eight years. This big hairy audacious goal has ignited us to:

- * Make us think completely out of the box when assessing potential opportunities
- * Innovate ways to become more effective in everything that we do

* Explore a wide range of opportunities all within the framework of our mission

* Constantly leave our comfort zones and take risks
Half way through this eight year vision we are on track to achieve our goal.

23. According to published reports, Envision has revenue of more than \$80 million per year.

24. Envision's current mission states: "We create unique experiences that provide a lifetime advantage to high achievers."

25. Envision also bills itself as "The world's largest creator of leadership and success programs for high achieving young people."

26. On its website, Envision describes "what we do" as:

To say we are an 'experiential education' company is akin to saying Microsoft is a software company... true at the core, but doesn't at all capture the true essence.

Experiential education by its very nature implies learning by doing. At Envision, all of the 'experiential education' experiences we create and lead do far more than share knowledge by simply doing. They all impart wisdom through:

Education - Each of the programs we produce centers around curriculum that is unique, interactive, age-appropriate, engaging, fun and pedagogically sound. Contact hours (i.e., time spent in actual curricular activities) are far greater than standard travel programs making Envision run programs truly superior educational experiences.

Motivation - Each of the programs we produce motivates participants to achieve far greater things in their lives than they had to date (this is saying something seeing that all participants are already high achievers!). Alumni of programs have gone on to successfully advocate for various causes, found non-profit organizations, start businesses and successfully pursue myriad career goals. In alumni surveys, we are consistently told of how the program (or programs) that they attended motivated them to aim higher and helped crystallize their dreams and visions.

Inspiration - Each of the programs we produce provides role models and success stories from which participants become inspired. Often times, it is the program participants themselves who have inspired Cabinet Members, Members of

Congress, Supreme Court Justices, CEOs, and other high-level speakers who have come to meet with them. Regardless of who is doing the inspiring, all participants return home with a sense of awe combined with a determination to inspire others.

While what we do can in its most simple form be described as 'experiential education' programs, what we really do, on a daily basis, for tens of thousands of people a year is EDUCATE, MOTIVATE and INSPIRE.

27. On its website, Envision states: "The customer satisfaction ratings for programs we run are extraordinarily high...we change peoples lives every day."

28. In February, 2009, however, the Better Business Bureau revoked Envision's accreditation for its poor customer service - in large part due to Envision's handling of the 2009 inauguration conferences and has graded the company with an "F".

B. Youth Inaugural Conferences

29. CYLC sponsors various educational and inauguration-related events for youth. These programs are managed, controlled, and run by its for-profit parent company, Envision.

30. CYLC sponsors (and Envision controls, manages, and runs) three substantially similar youth inaugural conferences that are designated by age groups.

31. The Junior Presidential Youth Inaugural Conference (JrPYIC) is held every four years for CYLC and National Young Scholars Program (NYSP) alumni, who will be in the 5th, 6th, 7th or 8th grade at the time of the inauguration.

32. The Presidential Youth Inaugural Conference (PYIC) is held every four years for high school-aged alumni of CYLC or National Youth Leadership Forum (NYLF) programs.

33. The University Presidential Inaugural Conference (UPIC) is held every four years for CYLC, National Youth Leadership Forum (NYLF), and the International Scholar Laureate Program (ISLP) alumni who are over the age of 18 at the time of the inauguration.

34. These three inaugural conferences are collectively referred to herein as YICs.

35. Upon information and belief, approximately 800 students participated in the YICs held for the second inauguration of President George W. Bush in 2005. This has been the typical size of the number of attendees at Defendants' conferences.

C. Defendants' 2009 Youth Inaugural Conference Representations

36. Beginning in or around January 2008, Defendants started to send advertising materials to Plaintiffs and class members around the United States in middle school, high school, and college soliciting their participation in the YICs. The YICs were to involve "five days of activities and events commemorating the presidential inauguration in Washington, D.C." to held in January 2009.

37. The YIC solicitation letters sent to Plaintiffs and Class Members made the following common and specific representations of material facts:

- "You will be present on the historic morning of January 20, 2009 as the President and Vice President of the United States of America are sworn into office."
- "You will be there to experience firsthand the grandeur of the inaugural parade, as the President and Vice President and their families proceed from the United States Capitol Building to the White House."
- "To conclude the Inauguration Day, you will attend a Black Tie Gala Inaugural Ball to further honor and celebrate this monumental event."
- "... you will have the opportunity to meet, historians, political experts and leading decision makers who will actively shape and implement the policies that will guide our country in the years to come."
- "Finally, you will explore historic sites in and around our nation's capital, be inspired by keynote speakers, including seven-time Tour de France winner, Lance Armstrong and participate in activities, debates and roundtable discussions that will expand your understanding of the presidential election process and our nation's democratic principles."

- “Space in the Inaugural Conference is extremely limited and will be assigned strictly in the order in which we receive enrollments.”
(Exhibit A).

38. Other advertising materials sent to Plaintiffs and class members made additional, common representations of material facts as follows:

- “Keynote Speaker Lance Armstrong, Chairman and Founder of the Lance Armstrong Foundation.”
- “Private access to the Smithsonian Institution on the National Mall.”
- “Witness the Inauguration, Oath of Office and Inaugural Address of the 44th President of the United States.”
- “View the inaugural parade as the President and Vice President’s motorcade travels from the United States Capitol Building down Pennsylvania Avenue to the White House.”
- “The exclusive Black Tie Gala Inaugural Ball is the culmination of the Conference. Dance and celebrate the night away in the center of the inaugural activities.”
(Exhibit B).

39. Parents of PYIC and JrPYIC Plaintiffs and class members also received solicitation letters which contained the following representations of material facts:

- “. . . is one of the few select students invited to attend this once-in-a-lifetime experience.”
- “. . . will have the opportunity to meet historians and leading decision makers who will actively shape and implement the policies that will guide our country in the years to come.”
- “. . . will witness the presidential inauguration, . . ., attend a Black Tie Gala Inaugural Ball and directly participate in educational activities, debates and roundtable discussions that will expand his understanding of the presidential election from the campaign process to the inauguration of the President and Vice President of the United States.”
(Exhibit C).

40. UPIC Plaintiffs and class members received e-mail solicitations which contained

the following representations of material facts:

- On January 20, 2009, the world will look on as its greatest democracy completes a peaceful transformation of power. While most will only be able to watch it on television, you will be among the privileged few who experiences this momentous occasion firsthand. (Exhibit D)
- As a special guest on the National Mall, you will bear witness as the President of the United States is sworn into office. You will meet White House officials, congressional staff, political experts and more! Following the inauguration, you will experience the sights and sounds of a jubilant nation during the Inaugural Parade and a Black Tie Gala Inaugural Ball. (Exhibit D).
- Attending the Conference represents a unique opportunity to personally witness and participate in what is sure to be one of the most historic presidential inaugurations in the history of our nation. As a special guest on the National Mall, you will look on as the 44th President of the United States is sworn into office. You will meet White House officials, congressional staff and political experts. Following the inauguration, you will experience the sights and sounds of a jubilant nation during the inaugural parade and attend a Black Tie Gala Inaugural Ball. (Exhibit E).

41. In reliance upon the Defendants' representations of material facts, Plaintiffs and the Class Members submitted applications to participate in the YICs and paid significant "tuition costs" to Defendants.

42. In reliance upon the Defendants' representations of material facts, Plaintiffs and class members also incurred expenses to travel to Washington, D.C., purchased mandatory YIC clothing, and purchased or rented evening wear appropriate for the promised "Black Tie Gala Inaugural Ball."

43. Defendants accepted applications for the YICs from students attending middle school, high school and college. Despite advertising the exclusive and limited nature of the event, Defendants accepted in excess of 15,000 students to attend the YICs. Upon information and belief, the number of students accepted into the 2009 YICs was approximately 18 times

larger than any other previous program sponsored by Defendants.

44. Plaintiffs and class members paid tuition in the amount of \$2,380 plus optional Tuition and Travel Protection Plan of \$109 for middle school and high school students, and \$2,620 plus optional Tuition and Travel Protection Plan of \$109 for university students.

45. The tuition was supposed to cover all of the YIC activities identified in preceding paragraphs, deluxe hotel accommodations at the historic Omni Shoreham and Marriot Wardman Park Hotels, either two or three meals per day depending on the grade level of the students, transportation, and group health insurance during the YICs.

46. In addition to the tuition, participants were responsible for all other expenses such as transportation to Washington, DC, other meals, the costs of conference wear, buying or renting attire for the “Black Tie Gala Inaugural Ball,” optional purchases offered by Defendant including photographs, and other incidental expenses.

47. The total gross revenues to Defendants from the YICs totaled more than \$40 million.

48. The representations of material facts identified above in Defendants’ promotional materials were either intentionally or negligently made, and were false, had a tendency to mislead, and did mislead Plaintiffs and the Class Members.

49. Defendants uniformly failed to provide access to witness the inauguration and/or provide special access to the Mall for the inauguration and instead told students they were “on their own.”

50. Defendants uniformly failed to provide tickets to the inaugural parade and/or special access to watch the inaugural parade.

51. Defendants uniformly failed to provide tickets to an official Black Tie Gala

Inaugural Ball.

52. Defendants uniformly failed to deliver many of the prominent speakers who were promised to appear including Lance Armstrong.

53. Defendants uniformly failed to provide an opportunity to meet certain historians, political experts, leading decision makers, White House officials or congressional staff as promised.

54. Defendants also failed to provide adequate housing and transportation due to the logistical efforts of accommodating over 15,000 students.

55. Additionally, Defendant uniformly failed to state the following material facts which they had a duty to disclose and upon which reasonable individuals would have been expected to rely in deciding whether to attend the YICs:

- a. That tickets were required to actually “witness” the inauguration;
- b. That inauguration tickets were very limited and not generally available to the public;
- c. That Defendants had made no arrangements to provide tickets to Plaintiffs and class members to witness the inauguration;
- d. That Defendants had made no arrangements to provide Plaintiffs and class members with access to any specific or exclusive location on the Mall to view the inauguration;
- e. That tickets were required to actually “view” the inaugural parade;
- f. That inaugural parade tickets were very limited and not generally available to the public;
- g. That Defendant had made no arrangements to provide Plaintiffs and class

members with access to any specific or exclusive location along the inaugural parade route from which they could view the parade;

h. That the “Black Tie Gala Inaugural Ball” had no affiliation with any of the official inaugural balls held throughout Washington, D.C.,

i. That the “Black Tie Gala Inaugural Ball” would be held in school gymnasium styled facilities,

j. That formal evening wear was not required to attend the “Black Tie Gala Inaugural Ball;”

k. That over 15,000 students would be participating in the YICs and the program was not “selective” or “exclusive”; and/or

l. That the organizers would have inadequate resources and experience logistical difficulties in handling the extraordinary number of students participating in the YICs.

56. Defendants knew or should have known about these materials omissions at the time they solicited Plaintiffs and Class Members to participate in these events. In the alternative, even if Defendants did not know about these material omitted facts at the time that they initially solicited Plaintiffs and Class Members to attend the YICs, prior to the inauguration, these material facts did become known to Defendants prior to the inauguration and Defendants still failed to disclose them to Plaintiffs and Class Members and failed to give Plaintiffs and Class Members an opportunity to cancel, obtain refunds, and/or or otherwise mitigate their damages.

57. As such, prior to the time that the contract was to be performed by Defendants, they knew that they would not be able to perform and they advertised and/or offered services without the intent to provide the services as previously advertised and/or offered.

58. Numerous published reports have detailed the shortcomings and failures associated with the Defendants' 2009 YICs.

59. "You're told it's very selective, it wasn't at all," says Rasheed Hamdan, a graduate of American Military University. He flew in from Baja California Sur, Mexico, for the conference, the first he had ever attended. He had special business cards printed up and bought a tuxedo for an advertised black-tie gala, which turned out not to be formal or an official ball but, he says, a "glorified prom night."^[1]

60. Angie Peltzer, who worked for Envision several years ago and returned as a faculty adviser at the inaugural conferences, said the company's typical conferences enroll a few hundred students. She and the parents said that Envision extended the enrollment period last year to capitalize on excitement about Obama and that the company was unprepared to handle the number of students who signed up. "It's hard to do 15,000 people when you've only done 500 before," Peltzer said.^[2]

61. In a statement, quoted in published articles, Defendants said they would "accept full responsibility for the problems on the trip."^[3]

62. A spokeswoman for Defendants, Carmen McClaskey, said by e-mail: "We regret that anyone was disappointed with their experience with our inaugural programs. We are conducting an objective review and working closely with our vendors to determine what happened and how to prevent this from happening in the future."^[4]

1 Diane Scheme, "Congratulations! You are Nominated. It's an Honor. (It's a Sales Pitch)," *New York Times* (April 19, 2009).

2 David Nakamura, "Inaugural Program for Youth Criticized - Some Participants Missed Their Events," *The Washington Post* (Jan. 28, 2009).

3 Mathew Van Dusen and Harvy Lipman, "Company to repay \$1 million for bungled inauguration trip," *Northjersey.com* (Jan. 28, 2009).

4 *Id.*

63. According to published reports, Defendants initially offered full refunds to several parents.[5]

64. After more complaints surfaced, however, the company decided to set aside only \$1 million for refunds and discount vouchers for future conferences. \$1 million is enough to refund approximately 350 of the almost 16,000 students that attended the event, not including travel and other related expenses (or provide each student with approximately \$65 -- 2% of the total tuition cost).

65. Defendants set up a website and phone number to process refunds, but kept it active for only approximately two months. Upon information and belief, Defendants did not send notice of the availability of this limited refund program to all Plaintiffs and Class Members.

66. Defendants hired a former United States attorney general, Benjamin R. Civiletti, to study the events and recommend changes. Defendants have not released Mr. Civiletti's report.

VI. CLASS ACTION ALLEGATIONS

67. The named Plaintiffs bring this lawsuit as a class action on behalf of themselves and all other similarly situated consumers as members of a proposed Class pursuant to Federal Rule of Civil Procedure 23.

68. Based upon the allegations of this Complaint, this action satisfies the requirements for class certification.

69. The Class is defined as: All persons who paid money to attend one of Defendants' 2009 Inaugural Conferences in Washington, DC.

70. The following Persons shall be excluded from the Class: (1) Defendants and their subsidiaries, affiliates, officers and employees; (2) all Persons who make a timely election to be

5 *Id.*

excluded from the proposed Class; (3) governmental entities; and (4) the judge(s) to whom this case is assigned and any immediate family members thereof.

71. Plaintiffs reserve the right to re-define the Class prior to certification.

72. Although the exact number of Class Members is uncertain and can only be ascertained through appropriate discovery, Plaintiffs are informed and reasonably believe the number of Class Members is approximately 16,000 such that joinder is impracticable.

73. The Class is composed of an easily ascertainable, self-identifying set of individuals and entities who paid to attend the YICs.

74. There is a well-defined community of interest among the proposed Class Members, and the disposition of all their claims in a single action will provide substantial benefits to all parties and to the Court.

75. The claims of the representative Plaintiffs are typical of the claims of the Class Members in that the representative Plaintiffs, like all Class Members, paid money to attend the YICs.

76. The representative Plaintiffs, like all Class Members, have been damaged by Defendant's misconduct in that they did not get what they paid, bargained, or contracted for.

77. The factual bases for Defendants' misconduct are common to all Class Members and represent a common thread of wrongdoing resulting in injury to all members of the Class.

78. Plaintiffs will fairly and adequately protect the interests of the Class. They have retained counsel with substantial experience in prosecuting consumer class actions, and specifically actions involving deceptive advertising.

79. Plaintiffs and their counsel are committed to prosecuting this action vigorously on behalf of the Class, and have the financial resources to do so. Neither Plaintiffs nor their counsel

have any interests adverse to those of the Class.

80. Plaintiffs and the Class Members have all suffered harm and damages as a result of Defendants' unlawful and wrongful conduct.

81. The prosecution of separate actions by thousands of individual Class Members would create a risk of inconsistent or varying adjudications with respect to individual Class Members, thus establishing incompatible standards of conduct for Defendants;

82. The prosecution of separate actions by individual Class Members would also create the risk of adjudications with respect to them that would, as a practical matter, be dispositive of the interests of the other Class Members who are not a party to such adjudications and would substantially impair or impede the ability of such non-party Class Members to protect their interests.

83. Defendants have acted or refused to act on grounds generally applicable to the entire Class, thereby making appropriate final declaratory and injunctive relief with respect to the Class as a whole.

84. There are numerous questions of law and fact common to Plaintiffs and the Class that predominate over any questions that may affect individual Class Members, and include the following:

- a. Whether Defendant misrepresented material facts which had a tendency to mislead;
- b. Whether Defendants failed to state materials facts that tended to mislead;
- c. Whether Defendants advertised and offered services without the intent to sell them as advertised or offered;
- d. Whether Defendants made false representations and/or omissions of

material facts which the Defendants had a duty to disclose;

e. Whether Plaintiffs and Class Members reasonably relied upon Defendants' false representations and/or omissions in paying the tuition and other related expenses to attend the YIC's.

f. Whether Plaintiffs and Class Members entered into contracts with Defendants;

g. Whether Defendants failed to perform according to the contract terms and Plaintiffs failed to receive what they bargained for;

h. Whether Defendants' breach of the contract was material; and/or

i. Whether Plaintiffs are entitled to refunds, restitution, statutory damages, punitive damages, attorneys' fees and other relief as requested herein.

85. Given (i) the substantive complexity of this litigation; (ii) the size of individual Class Members' claims; and (iii) the limited resources of the Class Members, few, if any, Class Members could afford to seek legal redress individually for the wrongs Defendant has committed against them.

86. Class treatment of common questions of law and fact would also be superior to multiple individual actions or piecemeal litigation in that class treatment will foster an orderly and expeditious administration of Class claims, economies of time, effort and expense, and uniformity of decision.

87. This action presents no difficulty that would impede the Court's management of it as a class action, and a class action is the best and/or the only available means by which members of the Class can seek legal redress for the harm caused by Defendants.

88. Absent a class action, Defendants' misconduct will continue without remedy.

89. A class action is superior to other available methods for the fair and efficient adjudication of the controversy.

90. The issues common to Plaintiffs' and the Class Members' claims, some of which are identified above, are alternatively certifiable pursuant to Fed. R. Civ. P. 23(c)(4) as resolution of these issues would materially advance the litigation, and class resolution of these issues is superior to repeated litigation of these issues in separate trials.

VII. COUNTS

FIRST CLAIM FOR RELIEF
VIOLATION OF DC CONSUMER PROTECTION PROCEDURES ACT
DC STAT. § 28-3901, ET. SEQ

91. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint.

92. Under the DC Consumer Protection Procedures Act (CPPA), it is a violation to: misrepresent as to a material fact which has a tendency to mislead; fail to state a material fact if such failure tends to mislead; and advertise or offer goods or services without the intent to sell them or without the intent to sell them as advertised or offered.

93. As referenced herein, Defendant misrepresented material facts which had a tendency to mislead.

94. As referenced herein, Defendants failed to state materials facts that tended to mislead.

95. As referenced herein, Defendants advertised and offered services without the intent to sell them as advertised or offered.

96. A person, whether acting for the interests of itself, its members, or the general public, may bring an action under the CPPA seeking relief from the use by any person of a trade

practice in violation of a law of the District of Columbia and may recover or obtain the following remedies: (A) treble damages, or \$1,500 per violation, whichever is greater, payable to the consumer; (B) reasonable attorney's fees; (C) punitive damages; (D) an injunction against the use of the unlawful trade practice; (E) in representative actions, additional relief as may be necessary to restore to the consumer money or property, real or personal, which may have been acquired by means of the unlawful trade practice; or (F) any other relief which the court deems proper.

97. Under the CPPA, the remedies or penalties provided for are cumulative and in addition to other remedies or penalties provided by law.

98. As a direct and proximate result of Defendant's violations of the CPPA, Plaintiffs and class members suffered damages including the tuition paid for the YICs and other related expenses.

SECOND CLAIM FOR RELIEF
NEGLIGENT MISREPRESENTATION

99. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint.

100. As described herein, Defendants made false representations and/or omissions of material facts which the Defendants had a duty to disclose.

101. Plaintiffs and Class Members reasonably relied upon Defendants' false representations and/or omissions in paying the tuition and other related expenses to attend the YIC's.

102. As a direct and proximate result of the negligent misrepresentations of Defendants, Plaintiffs and Class Members suffered damages including the tuition paid for the YICs and other related expenses.

THIRD CLAIM FOR RELIEF
BREACH OF CONTRACT

103. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint.

104. Defendants sent written offers to Plaintiffs and Class Members to enter into a contract.

105. Plaintiffs and Class Members accepted Defendants' offer and entered into a contract to attend a YIC and attend the events as detailed in Defendants' marketing materials as described herein.

106. Plaintiffs paid Defendants valuable consideration as part of this contract.

107. Defendants failed to perform according to the contract terms and Plaintiffs failed to receive what they bargained for.

108. Defendants' breach of the contract was material.

109. As a direct and proximate result of Defendant's breach of contract, Plaintiffs and class members suffered damages including the tuition paid for the YICs and other related expenses.

VIII. PRAYER FOR RELIEF

Plaintiffs, on behalf of themselves and all others similarly situated, request the Court enter judgment against Defendants, as follows:

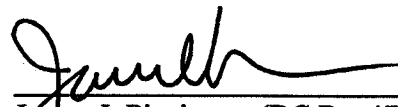
- a. An order certifying the proposed Class, designating Plaintiffs as the named representatives of the Class, and designating the undersigned as Class Counsel;
- b. An order enjoining Defendants from further deceptive advertising,

- marketing, distribution, and sales practices with respect to their YICs;
- d. An award to Plaintiffs and the Class of compensatory, statutory and punitive damages in an amount to be proven at trial;
 - e. An order requiring the restitution and restitutionary disgorgement to the Class of all benefits unlawfully retained by Defendants;
 - f. An award of attorneys' fees and costs, as allowed by law;
 - g. An award of pre-judgment and post-judgment interest, as provided by law;
 - h. For leave to amend the Complaint to conform to the evidence produced at trial; and
 - i. Such other or further relief as may be appropriate under the circumstances.

IX. DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury of any and all issues in this action so triable.

Dated this 13th day of May, 2009


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*** To Be Admitted Pro Hac Vice**

Attorneys for Plaintiffs and the Class

Exhibit A



March 12, 2008

Mr. Dash Radosti

Dear Dash,

In January 2009, our nation's capital will reverberate with the sights and sounds of a truly American celebration – the Inauguration of the 44th President and Vice President of the United States. On behalf of the Congressional Youth Leadership Council (CYLC), it is my great pleasure to invite you to take part in the Presidential Youth Inaugural Conference (PYIC)!

You've been selected to attend the Presidential Youth Inaugural Conference exclusively as an alumnus of the Junior National Young Leaders Conference (JrNYLC). You and your fellow alumni will be honored at the Inaugural Conference as distinguished young leaders and scholars. You will share in five days of activities and events commemorating the presidential inauguration in Washington, D.C. You will gain a deeper understanding of the history behind the electoral process and be inspired by the richness of tradition surrounding the inauguration.

You will be present on the historic morning of January 20, 2009 as the President and Vice President of the United States of America are sworn into office.

You will be there to experience firsthand the grandeur of the inaugural parade, as the President and Vice President and their families proceed from the United States Capitol Building to the White House. To conclude Inauguration Day, you will attend a Black Tie Gala Inaugural Ball to further honor and celebrate this monumental event.

Dash, you will have the opportunity to meet historians, political experts and leading decision makers who will actively shape and implement the policies that will guide our country in the years to come.

Mr. Dash Radosti
March 12, 2008
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Finally, you will explore historic sites in and around our nation's capital, be inspired by keynote speakers, including seven-time Tour de France winner, Lance Armstrong and participate in activities, debates and roundtable discussions that will expand your understanding of the presidential election process and our nation's democratic principles.

Dash, your deadline to enroll in the Presidential Youth Inaugural Conference is May 9, 2008.

Space in the Inaugural Conference is extremely limited and will be assigned strictly in the order in which we receive enrollments. As such, I urge you to enroll as soon as possible.

The fastest and most convenient way to enroll is directly online through our private and secure web site at www.cylc.org/pyic. Your Student ID, which you will need to enroll online, is 326118-865769. If you prefer, you can complete the Enrollment Application enclosed and return it in the postage-paid envelope provided.

If you have any questions about the Inaugural Conference, please contact me in the Office of Admissions at (703) 584-9897.

Rarely does an event evoke such a sense of excitement and anticipation as the Inauguration of the President of the United States. In one simple act, the peaceful transition of power is illustrated and our nation affirms its commitment to the constitutional process. Dash, I look forward to having you join us for this incredible experience.

Sincerely,



Tonia Jacobson
Director of Admissions

P.S. Attending the Presidential Youth Inaugural Conference this January 17-21, 2009 is a once-in-a-lifetime opportunity.

At the Conference, you will join other outstanding CYLC alumni from around the world who wish to take the next step on the path of leadership while witnessing history unfold before their eyes.

I encourage you to discuss PYIC with your family and enroll directly online at www.cylc.org/pyic, or complete and return the Enrollment Application enclosed immediately. Please remember, enrollments are due no later than May 9, 2008.

Exhibit B

Presidential Youth Inaugural Conference

Preliminary Schedule of Events



Opening Night Reception

Greet and network with your friends and fellow Inaugural Scholars

Keynote Speaker*

Lance Armstrong, Chairman and Founder of the Lance Armstrong Foundation

Inaugural Conference Debates

Topical debates and candid dialogue between prominent political analysts from both sides of the aisle and Inaugural Scholars

Inaugural Day Celebration

- + Private access to the Smithsonian Institution on the National Mall
- + Witness the Inauguration, Oath of Office and Inaugural Address of the 44th President of the United States
- + View the inaugural parade as the President and Vice President's motorcade travels from the United States Capitol Building down Pennsylvania Avenue to the White House
- + Visit the National Mall's monuments and museums

Educational Activities

- + Presidential Politics: Business and Personal
- + Presidential Campaign Strategy

Black Tie Gala Inaugural Ball

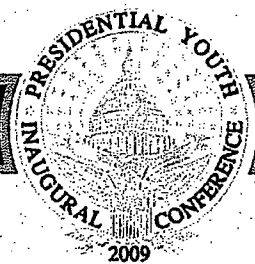
The exclusive Black Tie Gala Inaugural Ball is the culmination of the Conference. Dance and celebrate the night away in the center of all the inaugural activities. Stay up late as the nation's capital buzzes with excitement

** The Presidential Youth Inaugural Conference will be addressed by world-renowned, marquee Keynote Speakers. In addition, many prominent and sought-after speakers may be addressing Inaugural Scholars throughout the Conference? In the coming months, additional details on speakers and topics, events and activities will be added to the above Schedule of Events and conveyed to Inaugural Scholars as they are confirmed*

Preliminary Schedule of Events subject to change



Exhibit C



March 11, 2008

To the Parents of:
Dash Radosti

Dear Parent:

It is my privilege to congratulate you on your son's invitation to attend the Presidential Youth Inaugural Conference (PYIC). As an alumnus of the Junior National Young Leaders Conference (JrNYLC), Dash is one of the few select students invited to attend this once-in-a-lifetime experience.

For five days, Dash will take part in activities commemorating the presidential inauguration in Washington, D.C. As an Inaugural Scholar, he will witness and gain a deeper understanding of the history behind the electoral process and be inspired by the richness of tradition surrounding the inauguration. Dash will have the opportunity to meet historians and leading decision makers who will actively shape and implement the policies that will guide our country in the years to come.

Dash will witness the presidential inauguration, be inspired by keynote speakers, attend a Black Tie Gala Inaugural Ball and directly participate in educational activities, debates and roundtable discussions that will expand his understanding of the presidential election from the campaign process to the inauguration of the President and the Vice President of the United States.

Dash's enrollment materials for the Conference will arrive shortly. If you have any questions, please feel free to call our Office of Admissions at (703) 584-9897.

Attending the Inaugural Conference is a once-in-a-lifetime opportunity. It is my hope that Dash will join us for the Inaugural Conference, as I look forward to personally meeting him.

Sincerely,

Donna J. Snyder, Ed.D.

Donna J. Snyder, Ed.D.
Managing Director of Education

P.S. This January 17-21, 2009, Dash will have the unique opportunity to witness history in the making during the historic Inauguration of the President and Vice President. For more information about the Presidential Youth Inaugural Conference visit our web site at www.cylc.org/pyic.

Exhibit D

To:

Subject: Joshua, you've been selected to attend the Presidential Inauguration!

Date: Fri, 2 May 2008 14:03:22 -0700

From: upic@inauguralscholar.org

You've Been Selected to Attend the University Presidential Inaugural Conference!

Dear Joshua,

Congratulations! You have been selected to take part in a truly historic occasion—the inauguration of the 44th President of the United States! I am very excited to announce your selection to attend the University Presidential Inaugural Conference (UPIC) in Washington, D.C.

You have been awarded this special opportunity due to your scholarly achievements as an alumnus of the National Youth Leadership Forum on Law. At the Conference, you and your fellow alumni will be honored as distinguished young leaders and accomplished students. Attending the Inaugural Conference will also provide you with a great opportunity to reconnect with your friends from NYLF/LAW.

On January 20, 2009, the world will look on as its greatest democracy completes a peaceful transfer of power. While most will only be able to watch it on television, you will be among the privileged few who experiences this momentous occasion firsthand.

As a special guest on the National Mall, you will bear witness as the President of the United States is sworn into office. You will meet White House officials, congressional staff, political experts and more! Following the inauguration, you will experience the sights and sounds of a jubilant nation during the Inaugural Parade and a Black Tie Gala Inaugural Ball. Attending the Conference also represents an excellent opportunity to explore the many cultural and historic sites that only our nation's capital can offer.

I have just placed in the mail important materials regarding your selection to attend the Conference. The navy blue and cream envelope I am sending you, which contains all of the details you will need to enroll, should reach you in the next few days.

However, you do not have to wait for the arrival of your mail. You can enroll in

ONLINE ENROLLMENT

Click the button below to enroll in the 2009 University Presidential Inaugural Conference.



DATES & LOCATION

*January 17 - 21, 2009
Washington, D.C.*

SCHEDULE OF EVENTS

Click here to view a preliminary schedule of events

the Conference right now through our secure web site by [clicking here](#). To enroll online you will need your Student ID, which is: 326748-1008670013.

Congratulations again, and please look for the navy blue and cream envelope I am sending to arrive shortly. For more information on the University Presidential Inaugural Conference, please visit www.inauguralscholar.org.

Sincerely,



Marguerite C. Regan, Ph.D.
Director of Curriculum

phone: (703) 584-9896
e-mail: upic@inauguralscholar.org
web: www.inauguralscholar.org

University Presidential Inaugural Conference
1919 Gallows Road, Suite 700
Vienna, VA 22182

To unsubscribe, click [here](#) or send an email to: unsubscribe-16835@email.inauguralscholars.org

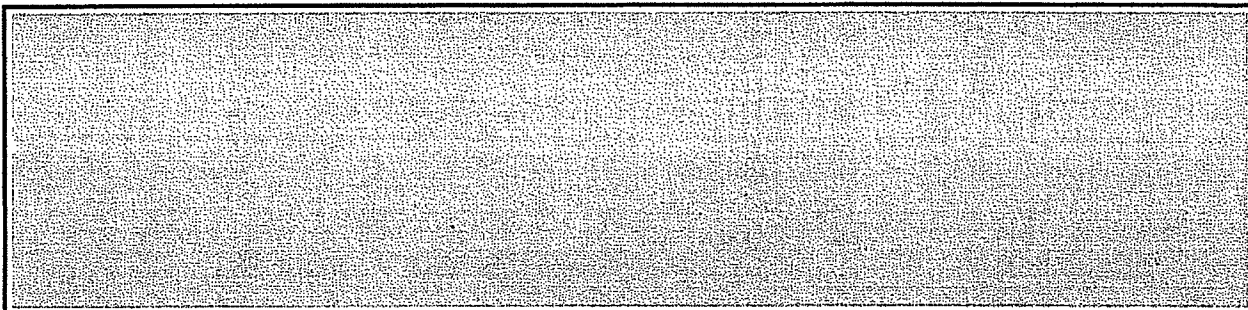


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Exhibit E

To:
Subject: Joshua, don't miss your chance to attend the Presidential Inauguration!
Date: Tue, 27 May 2008 11:02:49 -0700
From: upic@inauguralscholar.org



The Deadline to Enroll in the University Presidential Inaugural Conference is This Week!

Dear Joshua,

The deadline to enroll in the University Presidential Inaugural Conference (UPIC) is this Friday! Attending the Conference represents a unique opportunity to personally witness and participate in what is sure to be one of the most historic presidential inaugurations in the history of our nation.

As a special guest on the National Mall, you will look on as the 44th President of the United States is sworn into office. You will meet White House officials, congressional staff and political experts. Following the inauguration, you will experience the sights and sounds of a jubilant nation during the inaugural parade and attend a Black Tie Gala Inaugural Ball. Throughout the Conference, you will also have ample time to explore the many cultural and historic sites that only our nation's capital can offer.

Space in the Inaugural Conference is extremely limited. To ensure that you can take part in this historic occasion, I urge you to enroll in the Conference **before the upcoming deadline date of Friday, May 30, 2008**. The easiest and fastest way to enroll is directly through our secure web site by [clicking here](#). Your Student ID, which you need to enroll online, is: 326748-1008670013

If you have recently enrolled, let me tell you how excited I am that you will be taking part in this extraordinary opportunity, and please disregard this reminder. Contact our Office of Admissions with any specific questions you may have by calling (703) 584-9896.

Sincerely,



Tonia Jacobson
Director of Admissions

phone: (703) 584-9896

ONLINE ENROLLMENT

Click the button below to enroll in the 2009 University Presidential Inaugural Conference.



DATES & LOCATION

*January 17 - 21, 2009
Washington, D.C.*

SCHEDULE OF EVENTS

Click here to view a preliminary schedule of events

e-mail: upic@inauguralscholar.org
web: www.inauguralscholar.org

University Presidential Inaugural Conference
1919 Gallows Road, Suite 700
Vienna, VA 22182

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