

**STATE OF CONNECTICUT
BEFORE THE COMMISSIONER OF CONSUMER PROTECTION**

CIVIL INVESTIGATIVE DEMAND

**TO: CAREER TRAINING SPECIALISTS, LLC D/B/A STONE ACADEMY
c/o JOSEPH BIERBAUM
745 Burnside Avenue
East Hartford, CT 06108**

BY AUTHORITY OF THE STATE OF CONNECTICUT, and more particularly, pursuant to the Connecticut Unfair Trade Practices Act (“CUTPA”), Chapter 735a of the Connecticut General Statutes, and the authority granted the Commissioner of Consumer Protection for the State of Connecticut by virtue of Section 42-110d of the Connecticut General Statutes, Career Training Specialists, LLC d/b/a/ Stone Academy (“Respondent”), is hereby commanded to present to the Commissioner, UNDER OATH, by delivering to the Department of Consumer Protection, c/o Joseph E. Gasser, Assistant Attorney General, Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106, on or before **5:00 in the afternoon of March 10, 2023**, answers to Interrogatories and Documentary material in connection with an investigation into practices by Respondent which may constitute unfair or deceptive acts or practices in violation of the provisions of CUTPA. The Respondent is notified not to destroy, discard, alter in any manner, or transfer from their possession, any Documentary material requested or identified in any of the Respondent's responses to the Interrogatories and Document requests herein.

I. DEFINITIONS

This Civil Investigative Demand (“CID”) shall be read and interpreted in accordance with the definitions set forth below:

- A. “All” means all or any, and “Any” means all or any.

B. “And,” “All,” or “Or” shall be construed either conjunctively or disjunctively to bring within the scope of the request any information that might otherwise be construed to be outside its scope.

C. “Communication” means all meetings, conversations, conferences, discussions, correspondence, emails, text messages, messages, telegrams, telefaxes, mailgrams, and all oral, electronic, and written expressions or other occurrences whereby thoughts, opinions or data are transmitted between two or more individuals.

D. “Consumer” means and includes any person, a natural person, individual, governmental agency or entity, partnership, corporation, trust, estate, incorporated or unincorporated association, and any other legal or commercial entity however organized.

E. “Connecticut Consumer” means any Consumer with an address in Connecticut.

F. “Contact” means any form of communication.

G. “Custodian” means the person(s) who is/are most knowledgeable about the information and Documents requested herein, including:

1. The location and method of record keeping for the Documents responsive to this Request; and
2. The organization of the Documents as they are produced to the Commissioner pursuant to this Request.
3. Respondent's process for identifying Documents responsive to this Request. The person(s) shall have the ability to authenticate and identify each Document provided by You pursuant to the standard found in Fed. R. Evid. 902(11).

H. “Describe” or “Description” means to state with specificity all facts, including but not limited to time, comprising or pertaining to such fact, thing, condition, action or event, and to identify all individuals involved in such fact, thing, action or event.

M. “Documentary Material” or “Document” shall mean all written or graphic matter or electronically stored information (ESI), whether in final or draft form, however produced, or reproduced, of every kind and description in your actual or constructive possession, custody, care or control, including without limitation, all writings, communications, text messages and e-mails, account documents, calendars or planners, charts, reports, diaries, drafts, drawings, faxes, graphs, travel records, memoranda, minutes, notes, papers, photographs, receipts, reports, scripts, statements, statistical records, studies, presentations, time sheets or logs, vouchers, weigh tickets, working papers, or any other tangible thing.

This Civil Investigative Demand is intended to cover Documents and ESI in every form or source in which such Documents or ESI exists or in which you possess it, including without limitation computer or electronic files stored on file servers, e-mail servers, work stations, desktops, hard drives, personal digital assistants (PDAs), smartphones, tablets (e.g., iPads) and other mobile electronic devices, or other electronic social or industrial/business web-based media (e.g., Facebook®, Twitter®, LinkedIn®) within your control, including personal devices that you have used at any time for work; records, data, reports, and queries derived from or residing in applications and databases, data compilations from which information can be derived, converted or translated into reasonably usable form, magnetic discs, magnetic strips, magnetic tape, recognition characters, microfiche, microfilm, optical characters, punched cards, punched paper tapes, audio

tapes or recordings, or video tapes or recordings. Documents and ESI are in your “constructive possession, custody, care or control” if they reside physically or digitally on your premises, and also if they reside at the facilities of or on the servers or other devices of third parties such as “cloud” providers, Document storage facilities, back up sites, and other entities with whom you contract to maintain or house your Documents and ESI.

N. “Entity” means without limitation any corporation, company, limited liability company or corporation, partnership, limited partnership, association, or other firm or similar body, or any unit, division, agency, department, or similar subdivision thereof.

O. “Identify” means to set forth specific and detailed information, including, in the case of:

1. a communication, its date, type (e.g., telephone conversation or discussion), the place where it occurred, the identity of the person who made the communication, the identity of the person who received the communication, the identity of each other person when it was made, and the subject matter discussed (for e-mail, this information should be supplied in the metadata);
2. a natural person, his or her name, business or personal address, employer, and title or position;
3. a person other than a natural person (such as, for example, a firm, association, organization, business, partnership, trust, corporation, or public entity), its name, the address of its principal place of business, as well as, if it has a person other than a natural person

that ultimately controls it, that other person's name and the address of that person's principal place of business;

4. a Document, the title of the Document, the author, the title or position of the author, the addressee, each recipient, the type of Document, the subject matter, the date of preparation, and its number of pages.

P. "Including" means including but not limited to.

Q. "Instructors" means instructors, teachers Or faculty at Stone Academy, whether employed, contracted, or otherwise engaged.

R. "Person" includes a natural person as well as any firm, association, organization, business, partnership, trust, corporation, or public entity.

S. "Refer" means to make a statement about, embody, discuss, describe, reflect, identify, deal with, consist of, establish, comprise, list, or in any way pertain, in whole or in part, to the subject of the Document request.

T. "Relating To" or "In Relation To" means relating to, referring to, concerning, describing, pertaining to, evidencing, reflecting, regarding, constituting, involving, or touching upon in any way. Each of these terms may be used interchangeably herein and will be treated as encompassing all these meanings.

U. "Relevant Period" means the period from January 1, 2017, through the present. Any Interrogatory or Request for Production of Documents framed in the present tense shall be construed to cover the entire Relevant Period or any part of it.

V. "Respondent" means Career Training Specialists, LLC d/b/a/ Stone Academy or any of its former or present parent, sister, or subsidiary companies as well as all

former and present agents, members, employees, officers, principals, successors, assigns, or other individuals acting on its behalf, respective predecessors, successors, or any affiliates of the foregoing.

W. “You,” “Your,” or “Your Business” means Respondent.

X. The singular includes the plural and vice versa, and a verb tense includes all other tenses where the clear meaning is not distorted by the addition of another tense or tenses.

II. INSTRUCTIONS

The response to this CID shall be submitted in the following manner:

A. Time Period. Except where otherwise explicitly indicated, this CID covers the Relevant Period. Any Interrogatory or Request for Production of Documents framed in the present tense shall be construed to cover the entire Relevant Period or any part of it.

B. Preservation of Relevant Documents and Information; Spoliation. You are reminded of Your obligations under law to preserve Documents and information relevant or potentially relevant to this CID from destruction or loss, and of the consequences of, and penalties available for, spoliation of evidence. No agreement, written or otherwise, purporting to modify, limit or otherwise vary the terms of this CID shall be construed in any way to narrow, qualify, eliminate or otherwise diminish Your aforementioned preservation obligations. Nor shall You act, in reliance upon any such agreement or otherwise, in any manner inconsistent with Your preservation obligations under law. No agreement purporting to modify, limit or otherwise vary Your preservation obligations under law shall be construed as in any way narrowing, qualifying, eliminating or otherwise diminishing such aforementioned preservation obligations, nor shall You act in reliance upon any such agreement, unless an Assistant Attorney General confirms or acknowledges such agreement in writing or makes such agreement a matter of record in open court.

C. Possession, Custody, and Control. The CID calls for all responsive Documents or information in Your possession, custody or control. This includes Documents

or information possessed or held by any of Your officers, directors, employees, agents, representatives, divisions, affiliates, subsidiaries, persons or entities from whom You could request Documents or information. If Documents or information responsive to a request in this CID are in Your control, but not in Your possession or custody, You shall promptly Identify the person or entity with possession or custody.

D. Documents No Longer in Your Possession. If any document requested herein was formerly in Your possession, custody or control but is no longer available or no longer exists, You shall submit a statement in writing under oath that: (i) describes in detail the nature of such document and its contents; (ii) identifies the persons who prepared such document and its contents; (iii) identifies all persons or entities who have seen or had possession or custody of such document; (iv) specifies the date(s) on which such document was prepared, transmitted or received; (v) specifies the date(s) on which such document became unavailable; (vi) specifies the reason why such document is unavailable, including whether it was misplaced, lost, destroyed or transferred; and if such document has been destroyed or transferred, the conditions of and reasons for such destruction or transfer and the identity of the persons or entities requesting or performing such destruction or transfer; and (vii) identifies all persons or entities with knowledge of any portion of the contents of the document.

E. No Documents Responsive to Requests. If there are no Documents responsive to any particular request, You shall so state in writing under oath in the Affidavit of Compliance attached hereto, Identifying the paragraph number(s) of the request concerned.

F. Format of Production. You shall produce Documents and information responsive to this CID in the format requested by the Office of the Attorney General. Productions in electronic format shall meet the specifications set out in Attachments 1 and 2, unless otherwise agreed to in writing with an Assistant Attorney General.

G. Existing Organization of Documents to be Preserved. Regardless of whether a production is in electronic or paper format, each document shall be produced in the same form, sequence, organization or other order or layout in which it was maintained before production, including production of any document or other material indicating filing or other organization. Such production shall include any file folder, file jacket, cover or similar organizational material, as well as any folder bearing any title or legend that contains no document. Likewise, all Documents that are physically attached to each other in Your files shall remain so attached in any production; or if such production is electronic, shall be accompanied by notation or information sufficient to indicate clearly such physical attachment.

H. Manner of Compliance – Custodians/Search Terms/Technology-Assisted Review. Prior consultation with the Office of the Attorney General is required concerning selection of custodians for document searches (whether electronic or otherwise) or for use of search term filters, predictive coding or other forms of technology-assisted review. The Office of the Attorney General reserves the right to approve, disapprove, modify or supplement any proposed list of custodians, search terms or review methodology. The selection or use of custodians, search term filters or technology-assisted review in no way relieves You of Your obligation to fully respond to these requests for Documents or information.

I. Document Numbering. All Documents responsive to this CID, regardless of whether produced or withheld on ground of privilege or other legal doctrine, and regardless of whether production is in electronic or paper format, shall be numbered in the lower right corner of each page of such document, without disrupting or altering the form, sequence, organization or other order or layout in which such Documents were maintained before production. Such number shall comprise a prefix containing the producing party's name or an abbreviation thereof, followed by a unique, sequential, Identifying document control number.

J. Privilege Placeholders. For each document withheld from production on ground of privilege or other legal doctrine, regardless of whether a production is electronic or in hard copy, You shall insert one or more placeholder page(s) in the production bearing the same document control number(s) borne by the document withheld, in the sequential place(s) originally occupied by the document before it was removed from the production.

K. Privilege. If You withhold or redact any document responsive to this CID on ground of privilege or other legal doctrine, You shall submit with the Documents produced a statement in writing under oath, stating: (i) the document control number(s) of the document withheld or redacted; (ii) the type of document; (iii) the date of the document; (iv) the author(s) and recipient(s) of the document; (v) the general subject matter of the document; and (vi) the legal ground(s) for withholding or redacting the document. If the legal ground for withholding or redacting the document is attorney-client privilege, You shall indicate the name of the attorney(s) whose legal advice is sought or provided in the document.

L. Your Production Instructions to be Produced. You shall produce a copy of all written or otherwise recorded instructions prepared by You concerning the steps taken to respond to this CID. For any unrecorded instructions given, You shall provide a written statement under oath from the person(s) who gave such instructions that details the specific content of the instructions and any person(s) to whom the instructions were given.

M. Cover Letter, Index, and Identifying Information. Accompanying any production(s) made pursuant to this CID, You shall include a cover letter that shall at a minimum provide an index containing the following: (i) a description of the type and content of each document produced therewith; (ii) the paragraph number(s) of the CID request(s) to which each such document is responsive; (iii) the identity of the custodian(s) of each such document; and (iv) the document control number(s) of each such document. As further set forth in Attachment 2, information must also be included in the metadata and load files of each production concerning the identity of each document's custodian, as well as information Identifying the particular document requests or information to which each document is responsive.

N. Continuing Obligation to Produce. This CID imposes a continuing obligation to produce Documents and information responsive to the requests. Documents located or created, and information learned, acquired or created, at any time after Your response is due shall be promptly produced at the place specified in this CID.

O. No Oral Modifications. No agreement purporting to modify, limit or otherwise vary this CID shall be valid or binding, and You shall not act in reliance upon

any such agreement, unless an Assistant Attorney General confirms or acknowledges such agreement in writing or makes such agreement a matter of record in open court.

REQUESTS FOR INFORMATION AND DOCUMENTS

In accordance with the requirements set forth in the “Definitions” and “Instructions,” You are specifically required to respond to the following within the time frame set forth above:

(1) Identification of Responder

- (a) Identify the Person or individual(s) answering and/or assisting in answering this Request on Your behalf.
- (b) If other than the above, Identify the Person or individual(s) with the authority to, and best ability to, answer questions regarding the subject matter of this Request.

(2) Business Information

- (a) Produce All Documents Concerning Your legal identity and organization, Including organizational charts, All articles of organization or incorporation, articles of amendment, articles of reinstatement, and operating agreements.
- (b) Identify Your corporate officers, directors, managers, members, trustees, partners, or board members, as applicable and, for any which is an Entity, Identify its officers, directors, managers, members, trustees, beneficiaries, or partners.
- (c) Identify All physical addresses, post office boxes, telephone numbers, web addresses and email addresses from which You conduct business or have conducted business in or from Connecticut.
- (d) Identify All addresses and telephone numbers for All locations from which You conduct business and indicate which of these are used to conduct business in Connecticut or from Connecticut.

(3) Staffing

- (a) Identify All employees who have, or had, responsibility for the hiring or other engagement of Instructors at Stone Academy.
- (b) Identify Your requirements for all Instructors engaged by You in each of Your programs, Including any required qualifications and experience for hiring, any requirements for certification and recertification, and any requirements for continuing education.
- (c) Identify all Instructors engaged by You to instruct students in each

of Your programs, stating, for each, their education, training, and credentials, and in which program(s) and between what date range(s) they instructed Your students.

(4) Accreditation

- (a) Produce All Documents You submitted in connection with each of Your application(s) for accreditation and/or reaccreditation with the Connecticut Board of Examiners for Nursing for each of Your applicable degree programs during the Relevant Period;
- (b) Produce All Documents You submitted in connection with each of Your application(s) for a certificate of authorization and/or renewals thereof with the Connecticut Office of Higher Education;
- (c) Produce All Documents You submitted in connection with each of Your application(s) for accreditation and/or reaccreditation with the Accrediting Bureau of Health Education Schools for each of Your applicable degree programs during the Relevant Period;
- (d) Produce All Documents You submitted in connection with any application for participation in the Federal Student Aid program in connection with any of Your degree programs.

(5) Advertising Practices

- (a) Identify All employees or contractors who have, or had, responsibility for the advertisement or marketing of Stone Academy to prospective students.
- (b) Produce exemplars of All marketing materials for Stone Academy, whether print, online, or otherwise, specifically Including All marketing materials Related To the availability of certain degrees through Stone Academy's programs and Your preparation of students for the NCLEX and any other licensing or certification exam, and specify the location(s) and date range(s) in which such marketing materials appeared.

(6) Operations

- (a) Produce an exemplar of Your student application form(s) for each of its programs.
- (b) Produce Documents sufficient to show All Communications Relating To Your students' passage rate on the NCLEX exam.
- (c) Produce Documents sufficient to show All Communications Relating To Your instructional staffing for the courses in its Practical

Nursing program.

- (d) Produce Documents sufficient to show All Communications Relating To Your offering of “on-campus” clinical hours for nursing students.

(7) Student Information

Provide in working Excel spreadsheet(s) the following information related to each of Your students in the Relevant Period:

- (a) Name;
- (b) Address;
- (c) Telephone listing;
- (d) Electronic mail address;
- (e) Major field of study, or program;
- (f) Enrollment status as of February 15, 2023, including whether the student has withdrawn, transferred, graduated, or was then active;
- (g) Beginning and end dates of student’s enrollment;
- (h) Date of student’s enrollment agreement;
- (i) All Instructors who instructed the student;
- (j) Clinical experiences taken and for each, the name of the Instructor, number of hours, and term;
- (k) Clinical experiences (including date and clinical site) in which the ratio of students to Instructor was greater than 10 to 1;
- (l) Total number of clinical experience hours completed;
- (m) Total number of clinical experience hours taught as “campus clinical hours”; and
- (n) Tuition and fees paid by the student or on the student’s behalf, dates of payments, and sources of payment (such as Title IV, private loans, out-of-pocket).

(8) Revenue

- (a) Provide Your gross and net revenues for each year during the Relevant Period. Provide All calculations and All audited financial

statements relied upon to derive those gross and net revenues.

- (b) State the tuition and expenses for each of Your programs during the Relevant Period.
- (c) Provide a breakdown for each semester showing how many students paid tuition and expenses out of pocket, with private student loans, and with federal student loans.

(9) Complaints

- (a) Produce Documents reflecting All complaints You have received Relating To the quality or fitness of Your educational programs, specifically Including complaints Related To the qualifications of Your instructors or lack of preparedness for any licensing or certification exam.
- (b) Produce Documents reflecting Your response to All complaints You have received Relating To the quality or fitness of Your educational programs, specifically Including complaints Related To the qualifications of Your instructors or lack of preparedness for any licensing or certification exam.

(10) School Closure

- (a) Provide all Communications Relating To Your discontinuance of classes on or about February 16, 2023.
- (b) State when the decision was made to close Stone Academy.
- (c) State when and how the decision to close Stone Academy was communicated to students.
- (d) State when the decision was made to discontinue classes on or about February 16, 2023.
- (e) State when and how the decision to discontinue classes on or about February 16, 2023 was communicated to students.
- (f) Describe the efforts Stone Academy has made, or will make, to:
 - i. Provide financial or other reimbursement to current students affected by Stone Academy's closure;
 - ii. Ensure its students receive appropriate refunds for tuition payments;
 - iii. Ensure its students can transition smoothly to other

institutions; and

- iv. Advise students of their rights and options following Stone Academy's closure.

HEREOF FAIL NOT UNDER PENALTY OF LAW.

Dated at Hartford, Connecticut, this 22 day of February, 2023

A handwritten signature in blue ink that reads "Michelle Seagull". The signature is written in a cursive style.

MICHELLE SEAGULL
COMMISSIONER OF CONSUMER PROTECTION

**STATE OF CONNECTICUT
BEFORE THE COMMISSIONER OF CONSUMER PROTECTION
INVESTIGATIVE DEMAND**

OATH

Personally appeared, _____, who, being duly sworn deposes and says that the answers to the Interrogatories and Document requests attached hereto and contained in the Investigative Demand issued to Career Training Specialists, LLC d/b/a Stone Academy _____ are accurate to the best of their knowledge and belief.

Name:
Title:

Subscribed and sworn to me this _____ day of _____, 2023.

Notary Public/ Commissioner of the Superior Court

ATTACHMENT 1

Electronic Document Production Specifications

Unless otherwise specified and agreed to by the Office of Attorney General, all responsive Documents must be produced in LexisNexis® Concordance® format in accordance with the following instructions. Any questions regarding electronic document production should be directed to the Assistant Attorney General whose telephone number appears on the CID.

1. Concordance Production Components. A Concordance production consists of the following component files, which must be produced in accordance with the specifications set forth below in Section 7.
 - A. ***Metadata Load File.*** A delimited text file that lists in columnar format the required metadata for each produced document.
 - B. ***Extracted or OCR Text Files.*** Document-level extracted text for each produced document or document-level optical character recognition (“OCR”) text where extracted text is not available.
 - C. ***Single-Page Image Files.*** Individual petrified page images of the produced Documents in tagged image format (“TIF”), with page-level Bates number endorsements.
 - D. ***Opticon Load File.*** A delimited text file that lists the single-page TIF files for each produced document and defines (i) the relative location of the TIF files on the production media and (ii) each document break.
 - E. ***Native Files.*** Native format versions of non-printable or non-print friendly produced Documents.
2. Production Folder Structure. The production must be organized according to the following standard folder structure:
 - data\ (contains production load files)
 - images\ (contains single-page TIF files, with subfolder organization)
 \0001, \0002, \0003...
 - native_files\ (contains native files, with subfolder organization)
 \0001, \0002, \0003...
 - text\ (contains text files, with subfolder organization)
 \0001, \0002, \0003...
3. De-Duplication. You must perform global de-duplication of stand-alone Documents and email families against any prior productions pursuant to this or previously related CIDs.

4. Paper or Scanned Documents. Documents that exist only in paper format must be scanned to single-page TIF files and OCR'd. The resulting electronic files should be pursued in Concordance format pursuant to these instructions. You must contact the Assistant Attorney General whose telephone number appears on the CID to discuss (i) any Documents that cannot be scanned, and (ii) how information for scanned Documents should be represented in the metadata load file.
5. Structured Data. Before producing structured data, including but not limited to relational databases, transactional data, and xml pages, You must first speak to the Assistant Attorney General whose telephone number appears on the CID. Structured data is data that has a defined length and format and includes, but is not limited to, relational databases, graphical databases, JSON files, or xml/html pages.

A. Relational Databases

1. Database tables should be provided in CSV or other delimited machine-readable, non-proprietary format, with each table in a separate data file. The preferred delimiter is a vertical bar "|". If after speaking with the Assistant Attorney General and it is determined that the data cannot be exported from a proprietary database, then the data can be produced in the proprietary format so long as the Office of the Attorney General is given sufficient access to that data.

2. Each database must have an accompanying Data Dictionary.

3. Dates and numbers must be clearly and consistently formatted and, where relevant, units of measure should be explained in the Data Dictionary.

4. Records must contain clear, unique identifiers, and the Data Dictionary must include explanations of how the files and records relate to one another.

5. Each data file must also have an accompanying summary file that provides total row counts for the entire dataset and total row counts.

B. Compression

1. If Documents are provided in a compressed archive, only standard lossless compression methods (e.g., gzip, bzip2, and ZIP) shall be used. Media files should be provided in their original file format, with metadata preserved and no additional lossy encoding applied.

6. Media and Encryption. All Documents must be produced on CD, DVD, or hard-drive media. After consultation with the Assistant Attorney General, Documents may also be produced over a secure file transfer protocol (FTP), a pre-approved

cloud-based platform (e.g. Amazon Web Services S3 bucket), or the Attorney General's cloud platform OAGCloud. All production media must be protected with a strong, randomly-generated password containing at least 16 alphanumeric characters and encrypted using Advanced Encryption Standard with 256-bit key length (AES-256). Passwords for electronic Documents, files, compressed archives and encrypted media must be provided separately from the media.

7. Production File Requirements.

A. ***Metadata Load File***

- Required file format:
 - ASCII or UTF-8
 - Windows formatted CR + LF end of line characters, including full CR + LF on last record in file.
 - .dat file extension
 - Field delimiter: (ASCII decimal character 20)
 - Text Qualifier: þ (ASCII decimal character 254). Date and pure numeric value fields do not require qualifiers.
 - Multiple value field delimiter: ; (ASCII decimal character 59)
- The first line of the metadata load file must list all included fields. All required fields are listed in Attachment 2.
- Fields with no values must be represented by empty columns maintaining delimiters and qualifiers.
- **Note:** All Documents must have page-level Bates numbering (except Documents produced only in native format, which must be assigned a document-level Bates number). The metadata load file must list the beginning and ending Bates numbers (BEGDOC and ENDDOC) for each document. For document families, including but not limited to emails and attachments, compound Documents, and uncompressed file containers, the metadata load file must also list the Bates range of the entire document family (ATTACHRANGE), beginning with the first Bates number (BEGDOC) of the “parent” document and ending with the last Bates number (ENDDOC) assigned to the last “child” in the document family.
- Date and Time metadata must be provided in separate columns.
- Accepted date formats:
 - mm/dd/yyyy
 - yyyy/mm/dd
 - yyyymmdd
- Accepted time formats:
 - hh:mm:ss (if not in 24-hour format, You must indicate am/pm)
 - hh:mm:ss:mmm

B. ***Extracted or OCR Text Files***

- You must produce individual document-level text files containing the full extracted text for each produced document.

- When extracted text is not available (for instance, for image-only Documents) You must provide individual document-level text files containing the document's full OCR text.
- The filename for each text file must match the document's beginning Bates number (BEGDOC) listed in the metadata load file.
- Text files must be divided into subfolders containing no more than 500 to 1000 files.

C. ***Single-Page Image Files (Petrified Page Images)***

- Where possible, all produced Documents must be converted into single-page tagged image format ("TIF") files. See Section 7.E below for instructions on producing native versions of Documents You are unable to convert.
- Image Documents that exist only in non-TIF formats must be converted into TIF files. The original image format must be produced as a native file as described in Section 7.E below.
- For Documents produced only in native format, You must provide a TIF placeholder that states "Document produced only in native format."
- Each single-page TIF file must be endorsed with a unique Bates number.
- The filename for each single-page TIF file must match the unique page-level Bates number (or document-level Bates number for Documents produced only in native format).
- Required image file format:
 - CCITT Group 4 compression
 - 2-Bit black and white
 - 300 dpi
 - Either .tif or .tiff file extension.
- TIF files must be divided into subfolders containing no more than 500 to 1000 files. Where possible Documents should not span multiple subfolders.

D. ***Opticon Load File***

- Required file format:
 - ASCII
 - Windows formatted CR + LF end of line characters
 - Field delimiter: , (ASCII decimal character 44)
 - No Text Qualifier
 - .opt file extension
- The comma-delimited Opticon load file must contain the following seven fields (as indicated below, values for certain fields may be left blank):
 - ALIAS or IMAGEKEY – the unique Bates number assigned to each page of the production.
 - VOLUME – this value is optional and may be left blank.

- RELATIVE PATH – the filepath to each single-page image file on the production media.
- DOCUMENT BREAK – defines the first page of a document. The only possible values for this field are “Y” or blank.
- FOLDER BREAK – defines the first page of a folder. The only possible values for this field are “Y” or blank.
- BOX BREAK – defines the first page of a box. The only possible values for this field are “Y” or blank.
- PAGE COUNT – this value is optional and may be left blank.
- **Example:**
 ABC00001,,IMAGES\0001\ABC00001.tif,Y,,,2
 ABC00002,,IMAGES\0001\ABC00002.tif,,,,
 ABC00003,,IMAGES\0002\ABC00003.tif,Y,,,1
 ABC00004,,IMAGES\0002\ABC00004.tif,Y,,,1

E. ***Native Files***

- Non-printable or non-print friendly Documents (including but not limited to spreadsheets, audio files, video files and Documents for which color has significance to document fidelity) must be produced in their native format.
- The filename of each native file must match the document’s beginning Bates number (BEGDOC) in the metadata load file and retain the original file extension.
- For Documents produced only in native format, You must assign a single document-level Bates number and provide an image file placeholder that states “Document produced only in native format.”
- The relative paths to all native files on the production media must be listed in the NATIVEFILE field of the metadata load file.
- Native files that are password-protected must be decrypted prior to conversion and produced in decrypted form. In cases where this cannot be achieved the document’s password must be listed in the metadata load file. The password should be placed in the COMMENTS field with the format Password: <PASSWORD>.
- You may be required to supply a software license for proprietary Documents produced only in native format.

ATTACHMENT 2

Required Fields for Metadata Load File

FIELD NAME	FIELD DESCRIPTION	FIELD VALUE EXAMPLE¹
DOCID	Unique document reference (can be used for de-duplication).	ABC0001 or ###.#####.###
BEGDOC	Bates number assigned to the first page of the document.	ABC0001
ENDDOC	Bates number assigned to the last page of the document.	ABC0002
BEGATTACH	Bates number assigned to the first page of the parent document in a document family (<i>i.e.</i> , should be the same as BEGDOC of the parent document, or PARENTDOC).	ABC0001
ENDATTACH	Bates number assigned to the last page of the last child document in a family (<i>i.e.</i> , should be the same as ENDDOC of the last child document).	ABC0008
ATTACHRANGE	Bates range of entire document family.	ABC0001 - ABC0008
PARENTDOC	BEGDOC of parent document.	ABC0001
CHILDDOCS	List of BEGDOCs of all child Documents, delimited by “;” when field has multiple values.	ABC0002; ABC0003; ABC0004...
DOCREQ	List of particular Requests for Documents to be Produced in the CID	1; 2; 3 . . .
INTERROG	List of particular [Requests for Information] [interrogatories] in the CID	1; 2; 3 . . .
COMMENTS	Additional document comments, such as passwords for encrypted files.	

¹ Examples represent possible values and not required format unless the field format is specified in Attachment 1.

NATIVEFILE	Relative file path of the native file on the production media.	.\Native_File\Folder\...\BEGDOC.ext
SOURCE	For scanned paper records this should be a description of the physical location of the original paper record. For loose electronic files this should be the name of the file server or workstation where the files were gathered.	Company Name, Department Name, Location, Box Number...
CUSTODIAN	Owner of the document or file.	Firstname Lastname, Lastname, Firstname, User Name; Company Name, Department Name...
FROM	Sender of the email.	Firstname Lastname < FLastname @domain >
TO	All to: members or recipients, delimited by “;” when field has multiple values.	Firstname Lastname < FLastname @domain >; Firstname Lastname < FLastname @domain >; ...
CC	All cc: members, delimited by “;” when field has multiple values.	Firstname Lastname < FLastname @domain >; Firstname Lastname < FLastname @domain >; ...
BCC	All bcc: members, delimited by “;” when field has multiple values	Firstname Lastname < FLastname @domain >; Firstname Lastname < FLastname @domain >; ...
SUBJECT	Subject line of the email.	
DATERCVD	Date that an email was received.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd
TIMERCVD	Time that an email was received.	hh:mm:ss AM/PM or hh:mm:ss
DATESENT	Date that an email was sent.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd
TIMESENT	Time that an email was sent.	hh:mm:ss AM/PM or hh:mm:ss

CALBEGDATE	Date that a meeting begins.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd
CALBEGTIME	Time that a meeting begins.	hh:mm:ss AM/PM or hh:mm:ss
CALENDDATE	Date that a meeting ends.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd
CALENDTIME	Time that a meeting ends.	hh:mm:ss AM/PM or hh:mm:ss
CALENDAR DUR	Duration of a meeting in hours.	0.75, 1.5...
ATTACHMENTS	List of filenames of all attachments, delimited by “;” when field has multiple values.	AttachmentFileName.; AttachmentFileName.docx; AttachmentFileName.pdf;...
NUMATTACH	Number of attachments.	1, 2, 3, 4...
RECORDTYPE	General type of record.	IMAGE; LOOSE E-MAIL; E-MAIL; E-DOC; IMAGE ATTACHMENT; LOOSE E-MAIL ATTACHMENT; E-MAIL ATTACHMENT; E-DOC ATTACHMENT
FOLDERLOC	Original folder path of the produced document.	Drive:\Folder\...\...\
FILENAME	Original filename of the produced document.	Filename.ext
DOCEXT	Original file extension.	html, xls, pdf
DOCTYPE	Name of the program that created the produced document.	Adobe Acrobat, Microsoft Word, Microsoft Excel, Corel WordPerfect...
TITLE	Document title (if entered).	
AUTHOR	Name of the document author.	Firstname Lastname; Lastname, First Name; FLastname
REVISION	Number of revisions to a document.	18
DATECREATED	Date that a document was created.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd

TIMECREATED	Time that a document was created.	hh:mm:ss AM/PM or hh:mm:ss
DATEMOD	Date that a document was last modified.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd
TIMEMOD	Time that a document was last modified.	hh:mm:ss AM/PM or hh:mm:ss
FILESIZE	Original file size in bytes.	128, 512, 1024...
PGCOUNT	Number of pages per document.	1, 2, 10, 100...
IMPORTANCE	Email priority level if set.	Low, Normal, High
TIFFSTATUS	Generated by the Law Pre-discovery production tool (leave blank if inapplicable).	Y, C, E, W, N, P
DUPSTATUS	Generated by the Law Pre-discovery production tool (leave blank if inapplicable).	P
MD5HASH	MD5 hash value computed from native file (a/k/a file fingerprint).	BC1C5CA6C1945179FE E144F25F51087B
SHA1HASH	SHA1 hash value	B68F4F57223CA7DA358 4BAD7ECF111B8044F86 31
MSGINDEX	Email message ID	