# Contents

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Introduction</td>
<td>i</td>
</tr>
<tr>
<td></td>
<td>About the Authors</td>
<td>iii</td>
</tr>
<tr>
<td></td>
<td><strong>CHAPTER ONE</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Diploma Mills and Fake Degrees</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>by Jasmin Saidi-Kuhentert</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>CHAPTER TWO</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Transcript Fraud and Handling Fraudulent Documents</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td>by Allen Ezell</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>CHAPTER THREE</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Accreditation Mills: An Attempt to Gain Credibility</td>
<td>33</td>
</tr>
<tr>
<td></td>
<td>by Allen Ezell</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>CHAPTER FOUR</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Axact: The World's Largest Diploma Mill</td>
<td>53</td>
</tr>
<tr>
<td></td>
<td>by Allen Ezell</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>CHAPTER FIVE</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Diploma Mills: The Billion-Dollar-A-Year Competitor You Didn’t Know</td>
<td>71</td>
</tr>
<tr>
<td></td>
<td>You Had</td>
<td></td>
</tr>
<tr>
<td></td>
<td>by John Bear</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>CHAPTER SIX</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>When Government Approval Isn’t Worth the Paper It’s Forged On</td>
<td>89</td>
</tr>
<tr>
<td></td>
<td>by Alan Contreras</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>CHAPTER SEVEN</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fraud in Secondary School Credentials</td>
<td>103</td>
</tr>
<tr>
<td></td>
<td>by Aleks Morawski</td>
<td></td>
</tr>
</tbody>
</table>
CHAPTER EIGHT
Fraudulent Evaluation Services........................................... 115
by Aleksandar Popovski

CHAPTER NINE
Electronic Academic Records ............................................. 143
by Emily Tse

CHAPTER TEN
Fighting Fraud in the Admissions and Registrar’s Offices .... 163
by Ann Koenig and Ed Devlin

CHAPTER ELEVEN
The Apostille ........................................................................ 191
by Allen Ezell

CHAPTER TWELVE
How St. Regis University Hijacked Liberia ......................... 203
by George Gollin

APPENDIX A
Court Cases: Bogus High Schools ....................................... 233
by Jessica Montgomery

APPENDIX B
Diploma Mill Red Flags ...................................................... 237

APPENDIX C
Access to the Apostille.......................................................... 249

References ........................................................................ 259
Introduction

Corinne MacIntire
ASSOCIATE DIRECTOR OF PUBLICATIONS, AACRAO

There are many flags that might alert an admissions officer to the possibility of fraudulent, altered, or misleading documents. However, evaluating educational programs and documents is fraught with difficulties and complexities that ultimately leave it to the reader’s discretion to determine whether a school is a degree mill, an innovative educational institution, or something in between. The world of fraud is a dynamic one, populated by entities and individuals who adapt like chameleons and constantly reinvent themselves to do whatever is necessary to make a fast buck. Officials are urged to exercise informed judgment in making decisions about accepting degrees and/or credits for admission purposes so that fake credentials are not honored.

AACRAO presents this volume as a guidebook to give readers the information and tools needed in order to face and fight the complex battle against this type of fraud. This book informs readers about the issues related to fraud, helps teach techniques to detect bogus institutions and documents, offers guidelines in handling cases of fraud, and helps prevent institutions and organizations from becoming victims of fraud. Readers will leave with the ability to confidently discuss all of these issues with colleagues and superiors.

The material in this book offers perspectives from the sectors of higher education, security, consumer protection, government, and law enforcement. Advice ranges from general considerations of academic fraud, with working definitions that provide a practical basis for further investigation,
to specific problems and cases covering a spectrum of the types of fraud found in higher education today. Some of these writings have appeared in AACRAO resources such as AACRAO Transcript and AACRAO’s quarterly journal College and University, while other works are original. AACRAO wishes to thank the colleagues who have contributed to this compilation, whose invaluable and generous support of AACRAO’s work on the issue of higher education fraud includes presenting at AACRAO conferences and workshops, as well as sharing information, research, and writing.
About the Authors

John B. Bear, Ph.D.
John Bear has been researching and writing about bogus schools since he was a Ph.D. student at Michigan State University (a real school) in the 1960s. In addition to his Doctorate in communication, he has a B.A. in psychology and an M.J. in journalism from the University of California, Berkeley. He is the author or co-author of more than twenty non-fiction books for Random House, McGraw-Hill, Ten Speed Press, Career Press, and others. His book, Bear’s Guide to Non-Traditional Degrees, has sold more than half a million copies. He has taught at the University of Iowa, U.C. Berkeley, and San Francisco City College. He served as director of research for the education division of Bell & Howell, and director of new projects for the Financial Times of London. He was a speaker at multiple AACRAO conferences, the Distance Education and Training Council, and was keynote speaker at the Department of Defense triannual education conference for senior officers. He was the on-screen expert for seven fake school segments on Good Morning America, two episodes of Inside Edition, and appeared with Allen Ezell on Sixty Minutes II. He has done book promotions on The Today Show and Late Night with David Letterman. He consults on fake degree matters with lawyers, law enforcement, reporters, and human resource professionals, and has been an expert witness on these topics in state and federal courts. He was a consultant to the FBI, and to the Grateful Dead (although not at the same time), and in a weak moment, he was a contestant on Jeopardy.
ALAN L. CONTRERAS

A fourth-generation Oregonian, Contreras is a graduate of the University of Oregon and its law school. His work has been primarily in higher education, including time with the Missouri Department of Higher Education, Oregon Community College Association, University of Oregon, and twelve years as head of the Oregon Office of Degree Authorization, a college licensing and investigative unit of the state government. He was consultant to the National Council for State Authorization Reciprocity Agreements (SARA) establishment team from 2010 to 2012, a member of the SARA staff from 2013 to 2016 and is currently a semi-retired higher education consultant working primarily on issues of interstate operation of colleges.

He served for five years on the Oregon Teacher Standards and Practices Commission and for three years on the Lane Education Service District board. In addition to his community service, he has published several books as author or editor, primarily about higher education and natural history. Among these are Edge of Awe: Experiences of the Malheur-Steens Region of Oregon (Oregon State Univ. Press 2019), The Mind On Edge: An Introduction to John Jay Chapman’s Philosophy of Higher Education (CraneDance 2013), and Notes for a High School Graduate (Oregon Review 2015). More information about Alan is available on his website alanlcontreras.com.

ED DEVLIN

Ed Devlin was a foreign credential evaluator with AACRAO International Education Services (now called AACRAO International) and previously held the position of Director of Special Projects. He worked in international education for more than 40 years. He directed the International Student Program at Monterey Peninsula College (MPC), the English language and academic orientation programs at Stanford University, MPC, and the University of California Santa Cruz, and worked in international admissions at Golden Gate University. He also served as a consultant for many schools and programs in the U.S. and abroad.

Ed served on AACRAO’s International Admissions Committee and several NAFSA committees. He gave presentations, workshops, and training
sessions at numerous AACRAO and NAFSA conferences, and contributed many articles for AACRAO and NAFSA publications. Ed developed the first model for the AACRAO EDGE (Electronic Database for Global Education) and was a Life Member of NAFSA. Edward Devlin passed away peacefully at home on July 12, 2020 at the age of 80.

**ALLEN EZELL**

Allen Ezell is a retired FBI agent who specialized in education fraud and was in charge of the 1980’s diploma mill sting operation DIPSCAM. He is co-author with John Bear of *Degree Mills: The Billion-Dollar Industry That Has Sold Over a Million Fake Diplomas*. Allen also authored a number of AACRAO publications including *Accreditation Mills, Counterfeit Diplomas and Transcripts*, and contributed to *the International Guide*, as well as *College and University* journal.

Allen has also presented numerous sessions at AACRAO meetings through the years, with his first presentation at the 1984 AACRAO Annual Meeting in Denver. AACRAO has benefited from all of his expertise over the years through his insights in education fraud and his contributions to our AACRAO meetings and publications. Allen was presented the AACRAO Centennial Award for Excellence at the March, 2021 annual meeting, after his 38 year relationship with AACRAO.

**GEORGE GOLLIN**

George Gollin grew up in New York, earning degrees in physics from Harvard and Princeton. After a postdoctoral fellowship at the University of Chicago he returned to Princeton as an assistant professor, then joined the University of Illinois faculty in 1989. He and his wife live in Champaign and have one daughter.

His research in elementary particle physics has included collaboration on experiments at the Fermi National Accelerator Laboratory, Cornell Electron Storage Ring, and CERN. His scientific interests focus on the structure and origins of the equations describing matter and energy. Gollin teaches both undergraduate and graduate students, and has received teaching
About the Authors

awards for his leadership in restructuring the undergraduate physics curriculum at the University of Illinois.

Between 2004 and 2008, he assisted the Operation Gold Seal task force that dismantled St. Regis University and convicted its owners and staff of mail fraud and other felonies. Gollin wrote thousands of lines of analysis software for the Department of Justice and organized much of the electronic evidence seized from the defendants’ computers.

Press coverage of the case led to new federal legislation. Gollin worked with Congressional staff as they developed the Diploma Integrity Protection Act of 2007; part of the bill was included in the Higher Education Opportunity Act, which became law in 2008.

Gollin was elected to the Board of Directors of the Council for Higher Education Accreditation in 2006, served on UNESCO’s diploma mills working group in 2008, and regularly speaks on the subject of academic fraud. This work has led to appearances on CNN, CBS, Fox, and NPR as well as profiles in the Chicago Tribune and Wired magazine.

In 2009, Gollin received a John Simon Guggenheim Memorial Foundation Fellowship to support research for writing an account of St. Regis University and its harm to post-civil war Liberia.

ANN M. KOENIG

Ann Koenig is Associate Director of AACRAO International. Her career in international education spans more than thirty years and includes foreign credential evaluation with AACRAO and other professional evaluation services, campus-based work in international undergraduate and graduate admissions, student records management, and academic advising and transfer credit evaluation. She has worked with Cardinal Stritch University, a University of Maryland University College program in Germany, Golden Gate University, and the University of California, Berkeley.

As a respected expert in academic document review and fraud detection, Ms. Koenig has contributed to several AACRAO publications on the topic and shared her insights and recommendations for best practices at numerous workshops and conference sessions. Her achievements in inter-
national education include in-depth research and writing on education in several countries. She has presented at professional development and training events sponsored by AACRAO, NAFSA, NAGAP, EAIE, and several other organizations in the U.S. and Europe. Ms. Koenig has served on the NAFSA National ADSEC Committee and the AACRAO International Education Committee.

ALEKS MORAWSKI
Aleks Morawski is the Director of Evaluation Services at Scholaro Inc. He is the recipient of NAFSA’s 2020 Award for Outstanding Contributions to International Enrollment Management. His professional experience includes international undergraduate and graduate admissions and recruitment at major U.S. universities and training and consulting on various topics in international education. Aleks has served on NAFSA leadership and Trainer Corps since 2009. He participated in the AACRAO Cuba Project, co-authored NAFSA’s Managing a Successful International Admissions Office, and is the chairman of scholarship and publications for AICE, the Association of International Credential Evaluators. He is a regular presenter at local, national, and international professional conferences. Aleks holds an M.A. degree from San Diego State University.

ALEKSANDAR POPOVSKI
Aleksandar Popovski has been working in the field of international education since 2006. He has held leadership roles at several public and private colleges and universities, most recently as Assistant Dean of the Graduate School at the State University of New York at Binghamton. Alex is currently the President and Senior Evaluator at Ucredo, a credential evaluation company that is an Endorsed Member of the Association of International Credential Evaluators (AICE). Alex has presented at AICE symposia, NAFSA, TAICEP, and AACRAO conferences, credential forums, and webinars. He is a contributor to the NAFSA Online Guide to Educational Systems Around the World, and an author of the EDGE Macedonia profile. He was involved in setting up the TAICEP certificate, a training program for new credential evaluators.
About the Authors

**JASMIN SAIDI-KUEHNERT**

Jasmin Saidi-Kuehnert is the founder, President, and CEO of Academic Credentials Evaluation Institute, Inc. She is a published author and speaker on world education systems and advises institutions and organizations on emerging markets, credential evaluation standards, and building global pathways initiatives. She has served as chair of committees of professional associations such as NAFSA: Association of International Educators, AACRAO, and the Association of International Credential Evaluators. Currently, she is the Chair of the International Education Standards Council that oversees the country profiles and credential advice for AACRAO’s Electronic Database on Global Education. She is also the President of the Board of Directors of the Association of International Credential Evaluators, a non-profit professional association for credential evaluation service providers in the U.S. Jasmin holds a B.A. in Political Science from the University of San Diego and an M.B.A. from Pepperdine University.

**EMILY TSE**

Emily Tse is the Director of Evaluations at International Education Research Foundation (IERF), a non-profit agency founded as the first credentials evaluation service in the U.S. She received her Bachelor of Arts in Classical Studies from the University of Pennsylvania and her Master of Philosophy, also in Classics, from Cambridge University. She taught at the postsecondary level in both the U.K. and U.S. before becoming a credentials evaluator. Active in the field for over twenty years, Emily has presented at conferences at the regional, national, and international level, as well as contributed to publications such as IERF’s Country Index series, NAGAP’s Perspectives, TAICEP TALK, and NAFSA’s IEM Spotlight. Emily currently serves on TAICEP’s Digital Student Data Taskforce and AACRAO’s International Education Standards Council (IESC). Among its responsibilities, the IESC oversees and approves the placement recommendations found on the AACRAO EDGE database. Emily has also presented and written on topics relating specifically to fraud and diploma mills. Examples include contributing to the National Council of State Boards of Nursing’s resource manual.
for state licensing boards in 2015, presenting with the U.S. Department of Education Office of Inspector General on numerous occasions, and testifying on this subject matter in court hearings from various states. She is also the Co-Chair for TAICEP’s 2021 Digital Docs Provider Fair. In 2008, she received the Pioneer Research Grant for her comparative study on credentials evaluation in four countries. In 2019, she was given NAFSA’s Award for Outstanding Contribution to International Enrollment Management.