

International to process their credit transactions. Ms. Carasco said stores and internet merchants use Cardservice International to accept credit transactions from buyers of merchandise or services. She stated that Cardservice International accepts money on behalf of merchants who have opened an account with them, routes the money through Cardservice International's own bank account, and then transfers the money to the merchant's account. According to AEIT's account application, Dixie and Steven Randock are the signers for the Cardservice International AEIT account. The Randocks directed Cardservice International to send any receipts it receives on AEIT's behalf to an account held in the name of AEIT (account # 60118759) at the Bank of Fairfield. SA Benscoter advised that he compared several months of Cardservice International monthly statements for the AEIT Cardservice International account (# 267123402880) with deposits made to AEIT's Bank of Fairfield account (account # 60118759) and confirmed that the transfers from the Cardservice International account were made, as indicated. The transfers from Cardservice International appeared on AEIT's Bank of Fairfield account monthly statements under the name "merchant Bnkcd BC deposit 267123402880." In addition, Cardservice International provided correspondence to investigators that was sent from AEIT when "charge backs"

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(disputed charges) were made. AEIT provided documentation to Cardservice International that the charges were accurate. SA Benscoter has reviewed the documentation which includes invoices and copies of e-mails regarding the sale of diplomas and diploma charges. Such words as "BA/Master Combo," "Master/Business Management Accounting," etc., appear on the invoices and e-mails. SA Benscoter advised that it is his belief that all deposits to the Cardservice International account are from the sale of "diplomas" and "diploma" products (transcripts, etc.).

\$1.6 million Deposited into AEIT's Account #60118759 at Bank of Fairfield

145. SA Benscoter advised that during the period 1/1/01 through 12/31/04, over \$1.6 million were deposited to AEIT's account (# 60118759) at the Bank of Fairfield. SA Benscoter further advised that approximately half of the deposits appear to come from income from the sale of fraudulent "diplomas" and "diploma" products and the other half of the deposits are transfers from another Randock-controlled account, held in the name of "A+ Institute."

Analysis of Additional Offshore and Domestic Accounts Being Used By the Randocks

146. SA Benscoter's financial investigation revealed that other bank accounts

controlled by the Randocks include account # 3286282052 at Wells Fargo Bank in the name of "AEIT" located in Las Vegas, Nevada, and two offshore accounts, # CK-100941 and #SV-200084, at Banc Caribe, located in Roseau, Dominica, in the name of "Saint Regise University (AEIT Peer Degree Program) Graduate School."

147. SA Benscoter advised that he reviewed records obtained from Banc Caribe located in Roseau, Dominica regarding two accounts held in the name of "Saint Regise University." Dominica is located in the Caribbean, southeast of the Dominican Republic. The records reveal that Dixie and Steven Randock have sole signature authority for two offshore accounts held in the name of "Saint Regise University (AEIT Peer Degree Program) Graduate School" at Banc Caribe. In addition, both Dixie and Steven K. Randock used their U.S. passports as identification to open the Banc Caribe accounts because copies of each individual's passport was contained in the bank records. According to the bank statements, over \$250,000 was deposited to these accounts during 2002. SA Benscoter stated that it is his understanding, after speaking with an IRS agent stationed in the Caribbean and FBI agents familiar with Banc Caribe, that the bank has been closed by the Government of Dominica because it was suspected

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of laundering money, and over \$250,000 currently in the Randock's accounts has been frozen. According to the bank statements, nearly all the money sent to the Randocks' Banc Caribe accounts came from Worldpay, a "gateway" company that transfers money from internet buyers and sellers. In addition, Banc Caribe records indicate that on September 24, 2002, a \$50,000 wire transfer from Randock account CK100941 was made to an another offshore account (104000602405) held in the name of Steven and Dixie Randock at Loyal Bank located in St. Vincent, West Indies.

Analysis of AEIT's Worldpay Account

148. On 4/20/05, SA David Benscoter reviewed records obtained from Worldpay (21355 Ridgetop Circle, Suite 250, Dulles, Virginia, 20166) account 10604197 in the name "AEIT" for the time period April, 2002 through February 2005. Worldpay is a gateway company that accepts internet credit card payments from the buyers of a product or service and sends them to the sellers of a product or service. The signature card indicates Steve and Dixie Randock are the signers for the AEIT Worldpay account. According to Worldpay records, Worldpay transferred monies from the AEIT account at Worldpay to account number CK-100941 at Banc Caribe from 2002 until early 2003. As stated previously,

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documents obtained from Banc Caribe reveal that Steve and Dixie Randock have signature authority over account number CK-100941. It is also known, from Banc Caribe bank statements, that Worldpay deposits appear in the Banc Caribe account beginning July 23, 2002. The last Worldpay deposit to the Randock's Banc Caribe account occurred on January 31, 2003. Worldpay records indicate that over \$250,000 was received and sent to the Randock's Banc Caribe account in 2002. In August 2003, the Randock's changed their Worldpay receiving bank from Banc Caribe to Wells Fargo Bank, account #3286282052, located in Las Vegas, Nevada.

149. SA Benscoter advised that from his financial investigation he believes that deposits to the AEIT Worldpay account are from the sale of fraudulent "diplomas" and "diploma" products from "St. Regis University" and other similar Randock-controlled internet "schools" which sell fraudulent degrees. A review of the records reveals that many of the sales are to individuals located outside the United States. SA Benscoter advised that he believes these sales constitute payment to the Randocks for the sale of fraudulent "degrees." It is known from the review of other financial account records that many "degree" purchasers have addresses outside the United States. Second, although none of the individuals

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making purchases through Worldpay have been contacted, some of the names of purchasers were found on the internet. One such individual was Anne Cronvich. When her name was run through an internet search, a resume was found at www.privatelessons.com. Cronvich lists on her resume that she has an "M.F.A. Musical Theater, St. Regis University- Life/Work Experience Degree." She also lists "D.M.A. Vocal Pedagogy, St. Regis University- Life/Work Experience Degree." Worldpay records indicate Anne Cronvich paid \$2,996 to "AEIT" through Worldpay. Another name researched through the internet was Harris Crumpton. According to Worldpay records, Harris Crumpton paid "AEIT" \$1,220. On 5-13-05, SA David Benscoter spoke with Tom Justus. Justus is the Superintendent for the school district in Virginia that employs Harris Crumpton. Justus stated that during the summer of 2004, Crumpton was hired to be a principal at one of the public schools Justus oversees. Mr. Justus stated that the Commonwealth of Virginia has not recognized the certificate that Crumpton provided when he became principal. Mr. Justus said this "degree" was issued to Crumpton by "St. Regis University." Justus said the degree Crumpton submitted was apparently recognized by Liberia. SA Benscoter stated that based on the above evidence he believes the Worldpay account is being used substantially to

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transfer money from "degree" purchasers to the Randocks.

Analysis of AEIT's Wells Fargo Account

150. SA Bencoter advised that he has reviewed records for a Wells Fargo account (#328-6282052) held in the name of "AEIT, Inc." The account is located in Las Vegas, Nevada. The account is being used by Steve and Dixie Randock as a repository for proceeds collected from the sale of fraudulent "degrees" and "diploma" products. Signature authority for this account is held by Dixie and Steven K. Randock. SA Bencoter advised that over \$330,000 was deposited into this account during the period September 23, 2003 to March 3, 2005. The records reveal that nearly all the monies deposited into this Las Vegas account came from the AEIT Worldpay account.

Analysis of Paypal Records Regarding Dixie Randocks's Account

151. SA Bencoter reviewed records for Paypal account 1714368473394202564 held in the name of Dixie Randock (using the e-mail address of: payments@saintregisedu.org). Paypal is a company that transfers money over the internet, usually from buyers of products or services to the sellers. SA Bencoter stated that, according to the "Account Home" file supplied by PayPal, over \$187,000 has been deposited into this account since inception. The

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"Transaction Logs" file, supplied by PayPal, indicates these transactions occurred between December 12, 2001 to January 2, 2005. SA Benscoter noted that the bank account associated with this PayPal account is "AEIT" at Bank of Fairfield, account #60118759. Signature authority for the PayPal account is Dixie Randock. SA Benscoter stated that he reviewed the "Subject" column in the transaction log for this account. This column indicated numerous payments to Dixie Randock were for the purchase of "diplomas" and other academic credentials. For example, on December 29, 2004, a payment was received with the notation "AA degree"; on January 1, 2005, a payment was received with the notation "MBA 3.5"; and on January 2, 2005, a payment was received with the notation "High School diploma 3.8." SA Benscoter stated that in reviewing the withdrawals from this account regularly he realized that Dixie Randock did not have the money from this account transferred to AEIT's Bank of Fairfield account. Instead, withdrawals from Dixie Randock's PayPal account were apparently linked to a debit card. This debit card was used in three ways: (1) payment for goods and services such as hotel rooms (i.e. Davenport Hotel in Spokane, WA) or shoe purchases (i.e. www.shoes.com); (2) taken as cash from ATM machines, or (3) used to pay bills (Google adwords, Crystal Graphics, Inc,

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etc.).

Suspected Money Laundering Transactions

152. Subpoenaed bank records show that on May 24, 2004, check #1161 made payable to Dixie Randock in the amount of \$20,250 for "commission" was debited from AEIT's Bank of Fairfield account. The back of the check indicates it was cashed or deposited at US Bank. It is known that Dixie and Steven K. Randock have account # 1-535-0234-5942 at US Bank. A deposit of \$20,250 was made to this account on May 21, 2004. On August 10, 2004, a check for \$18,000 from "Canyon College" of Idaho was deposited into the AEIT account. According to the memo line on the face of the check, it was for "renewal of NBOE accreditation."

153. Regarding the Randocks' Banc Caribe account, the Randocks conducted financial transactions, in their checking and savings accounts, in amounts over \$10,000 on four occasions, as follows:

- on 7/23/02 there was an incoming wire of \$52,000 from Worldpay;
- on 8/2/02 there was a transfer of \$50,000 from checking to savings account;
- on 1/2/03 there was a transfer of \$100,000 from checking to savings account;
- In addition, it is known that the aforementioned \$50,000 was sent to the

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Randocks from their Banc Caribe account, via "outgoing wire" on 9-24-02.

According to Banc Caribe records, this \$50,000 was wire transferred to account # 104000602405 held in the name of Steven and Dixie Randock at Loyal Bank in St. Vincent, West Indies.

154. Not all records regarding the Randocks' Wells Fargo account have been received as of this day. However, the bank statements which have been reviewed reveal there were at least nine transactions, over \$10,000, involving the Randocks' Wells Fargo account. The following are the known monetary transactions by the Randocks which are over \$10,000:

- wire transfer deposit of \$194,638.88 on 11/13/03 from Worldpay Inc.
- wire transfer deposit of \$12,495.92 on 11/28/03 from Worldpay Inc.
- check #1003 withdrawal of \$32,300 on 3/22/04 written to Wells Fargo

Bank

- purchase of \$30,000 Cashiers Check # 0699904031 on 3/22/04 and made payable to Adept Escrow
- wire transfer withdrawal of \$15,000 on 5/4/04 to Wachovia Bank

NA BNF = "Academic Credential Assessment Corp"

- purchase of Cashiers Check # 0699904031 on 7/12/04 for \$30,000

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payable to Internal Revenue Service

- wire transfer withdrawal of \$31,119.56 on 7/13/04

- check #1009 withdrawal of \$30,000 on 7/13/04 payable to Wells

Fargo Bank

- wire transfer withdrawal of \$20,000 on 10/4/04 to "Union Bank of

California BNF = Abdul Kalaam Azad

- check #1018 withdrawal of \$60,000 on 11/10/04 PAYABLE TO

Wells Fargo Bank

- purchase of Cashiers Check # 0171502756 on 11/10/04 for \$60,000

payable to Internal Revenue Service

- wire transfer withdrawal of \$17,500 on 11/16/04 to Ecobank

Liberia BNF = S. Prince Porte

155. The financial investigation reveals that the Bank of Fairfield AEIT account, Banc Caribe "Saint Regise" checking and savings accounts, and Wells Fargo AEIT, Inc. account were utilized to directly receive proceeds from the internet sale of fraudulent degrees and other academic credentials, (thus money representing the proceeds of a specified unlawful activity, i.e., wire fraud acts). Therefore, Your Affiant believes there is probable cause to believe that these

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financial transactions, in excess of \$10,000, constitute violations of 18 U.S.C. § 1957 (Money Laundering).

Details of Criminal Tax Investigation

156. SA Benscoter stated that he has reviewed checks from the Steve and Dixie Randock's AEIT account at Bank of Fairfield in 2001 and 2002. SA Benscoter determined that over \$33,000 in checks had been written to Heidi Lorhan from that account in 2001 and 2002. SA Benscoter further advised that she received over \$4,900 in 2001 and \$28,000 in 2002. Some of the checks had notations on them such as "comm" and "15%.." Based on his experience, SA Benscoter believes that "comm" is a shorthand way of designating that the purpose of the checks was for the payment of "commission" to Heidi Lorhan and that "15%" indicates her percentage of "commission."

157. SA Benscoter conducted trash pickups at Heidi Lorhan's residence located at 14308 East 22nd, Veradale, Washington (now known as Spokane Valley, Washington). On February 24, 2005, and March 17, 2005, SA Benscoter found envelopes from "AEIT, 601 East Seltice Way, B-8, Post Falls, Idaho, 83854" which were addressed to "Heidi Lorhan, 14308 East 22nd, Veradale, WA. 99037." On March 17, 2005, SA Benscoter also discovered in the trash an

invoice that appears to represent commissions paid to Heidi Lorhan. SA

Benscoter believes that the envelope from AEIT contained the invoice.

Randock's Loyal Bank Account

158. SA Benscoter noted that Steve and Dixie Randock wire transferred \$50,000 in income from their Banc Caribe account to Loyal Bank in St. Vincent, West Indies, on September 24, 2002. SA Benscoter reviewed the Loyal Bank website and learned that one of the advertised benefits in having an account with Loyal Bank is the account-holder's ability to use an offshore debit card. SA Benscoter is familiar with the use of offshore debit cards by individuals who attempt to hide income from the IRS. Having an offshore debit card enables the account-holder to route pre-taxed income to an offshore account and then use the debit card to access (spend) the money. As a result, such an offshore debit card account-holder will not have unexplained income flowing through his/her domestic bank accounts in the event that he/she would ever be audited by the IRS. According to an e-mail dated 3/23/05 from "Dixie" of forwardinfo@university-services.net and sent to Vedmurthy Sarvotham at amved@hotmail.com, Dixie Randock instructed "Ved" that the credit card, debit card, and checks must not be in she and Steve Randock's name but must be in

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"Ved's" name and the cards must be given to Dixie and Steve Randock to use.

Dixie Randock also instructs "Ved" that she and Steve Randock "make the money decisions and should be the only ones to make purchases, transfers, payments, etc., unless [Steve and Dixie Randock]. . . have authorized them to be made" by Ved. Dixie Randock further explains that she and Steve Randock "[s]ometimes need to register a domain or buy something for the schools and we do not want our name on it." Stephen@advancedu.org was copied on the e-mail to "Ved."

The Internet

159. As part of Your Affiant's training and experience, Your Affiant has become familiar with the Internet, which is a network of computers that individuals and entities can use to gain access to a wide variety of information; to send information to, and receive information from, other individuals; to conduct commercial transactions; and to communicate via electronic mail ("e-mail"). An individual who wants to use Internet e-mail must first obtain an account with a computer that is linked to the Internet - for example, through a university, an employer, or a commercial service - which is called an "Internet Service Provider" or "ISP." Many ISPs assign each subscriber an account name, known as an "e-mail address," an e-mail mailbox, and a personal password selected by

the subscriber. By using a computer equipped with a telephone or cable modem, the subscriber can establish communication with an ISP over a telephone line or through a cable system, and can access the Internet by using his or her account name and personal password. Once the individual has accessed the Internet, he or she can use Internet mail services, including sending and receiving e-mail. In addition, the individual can visit web sites, which are locations on the Internet that offer information, services, or goods.

Searching and Seizing Computers

160. Based upon Your Affiant's training and experience, consultations with experts in computer searches, and Your Affiant's communications with other law enforcement agents who have been involved in the search of computers and retrieval of data from computer systems, Your Affiant knows that searching and seizing information from computers often requires agents to seize all electronic storage devices (along with related peripherals, software, documentation, data security devices and passwords) so that qualified computer expert in a laboratory or other controlled environment can more accurately analyze such evidence. This is true because of the following:

Volume of evidence: Computer storage devices (such as hard disks,

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diskettes, tapes, laser disks, CD-ROMs, DVDs, and Bernoulli drives) can store the equivalent of hundreds of thousands of pages of information. Additionally, a suspect may try to conceal criminal evidence by storing it in random order with deceptive file names or deceptive file extensions. This may require searching authorities to examine all the stored data to determine which particular files are evidence or instrumentalities of a crime. This sorting process can take weeks to months, depending on the volume of data stored. It would also be impractical to attempt this type of data search on site.

Technical requirements: Searching computer systems for criminal evidence is a highly technical process, requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert is qualified to analyze the system and its data. In any event, data search protocols are exacting scientific procedures designed to protect the integrity of the evidence and to recover even hidden, erased, compressed, password-protected, or

encrypted files. Since computer evidence is extremely vulnerable to inadvertent or intentional modification or destruction (both from external sources or from destructive codes embedded in the system, such as a "booby trap"), a controlled environment is essential to its complete and accurate analysis.

Search techniques: The analysis of electronically stored data may entail any or all of several different techniques. Such techniques may include, but are not limited to, surveying various file "directories" and the individual files they contain (which is analogous to looking at the outside of a file cabinet for the pertinent files in order to locate the evidence and instrumentalities authorized for seizure by the warrant); "opening" or reading the first few "pages" of such files in order to determine their precise contents; "scanning" storage areas to discover and possibly recover recently deleted data; scanning storage areas for deliberately hidden files; or performing electronic "keyword" searches through all electronic storage areas to determine whether occurrences of language contained in such storage areas exist that are intimately related to the

subject matter of the investigation.

Peripheral devices: The peripheral devices, which allow users to enter or retrieve data from the storage devices, vary widely in their compatibility with other hardware and software. Many system storage devices require particular input/output (or "I/O") devices in order to read the data on the system. It is important that the analyst be able to properly re-configure the system as it now operates in order to accurately retrieve the evidence contained therein. In addition, the analyst needs the relevant system software (operating system, interfaces, and hardware drivers) and any applications software, which may have been used to create the data (whether stored on hard drives or on external media), as well as all related instruction manuals or other documentation and data security devices. If the analyst determines that the I/O devices, software, documentation, and data security devices are not necessary to retrieve and preserve data after inspection, the government will return them within a reasonable amount of time.

Magnetic storage devices and CPU: In order to fully retrieve data

from a computer system, the analyst also needs all magnetic storage devices as well as the central processing unit (CPU). Further, the analyst needs all the system software (operating system or interfaces, and hardware drivers) and any applications software that may have been used to create the data (whether stored on hard drives or on external media) for proper data retrieval.

161. Based upon Your Affiant's knowledge, training, and experience; as well as the knowledge, training, and experience of SA Paul Kemppainen; that individuals who are engaging in fraudulent activities over the internet, utilize computer systems to receive, send, and store e-mail messages, communicate with associates, store billing, expense and asset information, and store information about degree purchasers and other related business information, it is my belief that any number of documents sought in this affidavit may be found stored electronically.

In this investigation, the warrant application requests permission to search and seize files, including those that may be stored on a computer. This affidavit also requests permission to seize the computer hardware that may contain any such files if it becomes necessary for reasons of practicality to remove the hardware

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and conduct a search off-site.

162. Your Affiant knows that computer hardware, software, and electronic files may be important to a criminal investigation in two distinct ways: (1) the objects themselves may be contraband, evidence, instrumentalities, or fruits of crime, and/or (2) the objects may be used as storage devices that contain contraband, evidence, instrumentalities, or fruits of crime in the form of electronic data. Rule 41 of the Federal Rules of Criminal Procedure permits the government to search for and seize computer hardware, software, and electronic files that are evidence of crime, contraband, instrumentalities of crime, and/or fruits of crime. Your Affiant believes that, in this case, the computer hardware is a container for evidence and also itself an instrumentality of the crimes under investigation.

Items To Be Seized

163. Your Affiant respectfully requests authority to seize the following items which constitute evidence of violations of 18 U.S.C. § 371 (Conspiracy); 18 U.S.C. § 1341 (Mail Fraud); 18 U.S.C. § 1343 (Wire Fraud); and 18 U.S.C. §§ 1956 and 1957 (Money Laundering); 15 U.S.C. § 78dd-2 (Prohibited Foreign Trade Practices):

Documents, records, and physical evidence for the period August 14, 1999,

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to the present, created by, sent to, or related to Dixie Ellen Randock,
Steven Karl Randock (also known as Steven Randock, Sr., Steven Randock, and
Steve Randock), Heidi Kae Lorhan, Amy Leann Hensley (also known as A.
Hensley), Richard John Novak (also known as Rick Novak), Blake Alan Carlson
(also known as B. Carlson), Roberta Lynn Markishtum, Kenneth Pearson,
Richard Hoyer, Sheila Danzig, Adbulah K. Dunbar, Fathima Riswana,
Abul Kalaam Azad, John Dovelos, G.D. Jalil (also known as Guillermo B. Jalil),
Stephen Frendock, Ahmed Rashed Ahmed, Abul Kalaam Azad, Dr. Gollin,
Mohammed Syed, James Hunter, Jallah Faciann, Thomas Carper, Jennifer
Greene, John McLaughlin, Randy Bush, Luise Correia (also known as Icorreia),
Prince Porte, L. Randock, R. Markishtum, Isaac Roland, Jayne W. Johnson,
Annie R. Maddox, Patrick O'Brien, William Johnson, Vedmurthy Sarvotham,
Monrovia Embassy, Liberian Embassy, Official Transcript Verification Center,
AEIT Peer Degree Program, Saint Regise, Children's Future Revocable Trust
(also known as Children's Future Trust), A+ Institute (also known as A+ Institute
and Printing), Northwest Business Stamp, Saint Regis University (also referred to
as St. Regis University and SRU), Robertstown University, James Monroe
University (also referred to as "JMU"), James Monroe University High School,

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Trinity Christian School, AEIT (Advanced Education Institute Trust),
Nation State University, Hartland University, New Manhattan University,
St. Lourdes University, Blackstone University, North United University,
Capital American University, InTech University, Port Rhode University,
Hampton Bay University, Van Ives University, Americana University,
All Saints American University, Stanley State University, Saint Renoir
University, American Capital University, United Auto Workers,
Atrium Incorporations, Collines De Fontaine, LLC, Ministry of Education,
The UPS Store, Mailboxes, Etc., PakMail, Saint Regis Educational Services,
AACRAO (also known as American Association of Collegiate Registrars and
Admissions Officers), NAFSA, Office Archive Registry, 4Gusta, Inc.,
UAE Embassy, Seborga, Italy, Advanced U, Kaching Kaching, Inc. (also known
as Kaching Kaching), When Pigs Fly, Inc. (also known as When Pigs Fly),
American Coastline University, National Board of Education (NBOE),
Career Consultants International (CCI), Academic Credential Assessment
Corporation (ACAC), International Commission for Higher Education (ICFHE),
Ameritech University, Fort Young University, Panamerica University,
Educational Services, INSYNC, LLC, AdvancedU, OTVC, Academic Credential

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Assessment Corporation, St. Regise University (AEIT Peer Degree Program)
Graduate School, Canyon College, US Documents, Inc., St. Regis Accounting,
DHL Delivery Company (also known as DHL), ThankyouPayment, Digital
Archive, Degree Authentication Attestation, University Services, Inc.,
Randolph Addison Davis Technical University, Degree Authentication
Attestation, University Services, Inc., World Chapel Ministries,
forwardinfo@university-services.net, www.Liberianembassy.com,
amved@hotmail.com, www.usdegree.com, www.saintregisedu.org,
www.e-grads.com, www.jamesmonroeuniversity.ac/jmu_admissions.html,
rowleygolf@yahoo.com, forward1@university-services.net, www.university-
services.net/james_sre/high_school/test.html, www.jamesmonroeuniversity.ac,
forward1@university-services.net, Agonthebeach@hotmail.com,
www.university-services.net/jamesmonroe/rev/worldpay_ja.html,
masyedholland@juno.com, www.university-services.net/jamesmonroe/fp_ja.html,
myemail.marketrends.net/src/compose.php?send_to=james%40university-
services.net, www.jamesmonroeuniversity.ac, james@university_services.net,
www.robertstownuniversity.ac, www.saintregisedu.org,
payments@saintregisedu.org, admissions@university-services.net,

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payments@saintregisedu.org, info@advancedu.org, info@saintregisedu.org,
info@aplusnow.com, info@robertstownuniversity.ac,
payments@saintregisedu.org, admissions@university-services.net,
Stephen@advancedu.org, frjames@advancedu.org, www.advancedu.org,
www.university-services.net, abcdegree.com, jamesmonroeuniversity.ac,
info@university-services.net, www.nationalboardedu.com,
admin@webmarche.com, degrees@university-services.net,
panamarick@highstream.net, admissions@university-services.net,
usdegrees.com, greginthedesert@hotmail.com, www.transcriptrecords.com,
www.distancedegree.edu.pk, Stephen@advancedu.org, (509) 466-8829,
(866) 312-2348, (208) 318-0568, (208) 777-9704, (208) 777-9707,
(610) 404-0406, (307) 235-2580, (509) 468-2728, (202) 318-0568,
(202) 543-0850, (602) 524-8785, (623) 583-7722, (509) 466-8829,
(509) 710-0215, 216.171.217.28, 216.171.217.187, 216.171.216.203,
65.101.109.164, 63.227.100.226, H1B Visa to wit:

- a. Papers, records, documents, files, notes, memos, or materials, in handmade

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or mechanical form (such as printed, written, handwritten, or typed); "diplomas"; school "transcripts";

b. E-mail correspondence in electronic and written form;

c. Computer or data processing hardware, software or data including, but not limited to: hard drives and disks, floppy disks, diskettes, compact disks, CD-ROMs, DVDs, optical discs, Zip cartridges, magnetic tapes, integral RAM or ROM units, electronic notebooks, smart cards, and any other permanent or transient storage device(s) or medium;

d. Computer passwords and other data security devices designed to restrict access to or hide computer software, documentation, or data, including any hardware, software, programming code, or passwords designed to restrict access to or hide computer software, documentation, or data;

e. Stored images or partial images of school "degrees", seals, stamps, signatures, identification documents, or scanned images or partial images of the same;

f. Embossing devices, rubber ink stamps, ink pads;

g. Foil or other manufactured seals including those seals of "schools", educational institutions, "accreditation" institutions, and embassies; equipment

and supplies capable of manufacturing school “degrees”, school “transcripts”, “Diploma Attestations”, or other documents related to “degrees”;

h. Ink pens or other writing utensil capable of signing documents related to degrees; laminating equipment and supplies capable manufacturing “Alumni ID cards”;

i. Records or materials relating to mailing or shipping of school “degrees” and related academic documents to “degree buyers”;

j. Personal and business telephone and address books, both written and electronic;

k. Any financial and business records, including: receipts and invoices for income and expenditures, financial statements, business income and expense records, bank account records, manually or computerized listings of payment schedules, ledgers and journals reflecting receipt or distribution of funds, correspondence or notes reflecting income or expenses, loan applications, contracts, pledges of collateral, stock certificates, records regarding payments of loans, records of business and travel expenses, credit cards and credit card records, telephone toll and usage records;

l. Records relative to expenditures for the acquisition, ownership, transfer,

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maintenance, deposit, withdrawal or disposition of any assets, including: payment receipts, bills of sale, promissory notes, mortgages, deeds, vehicle licenses, titles or registrations, insurance policies, and related files, notes, memoranda, and correspondence;

- m. Tax information including tax returns;
- n. Safety deposit box keys;
- o. Currency, money orders, cashier's checks, precious metals;
- p. Passports and other identification documents;
- q. Airline tickets and itineraries;
- r. Business diaries and day planners;
- s. Shipping records;
- t. Customers and degree purchaser lists;
- u. Debit cards, credit cards, and checks in the names of Dixie and Steven

Randock; and

- v. Debit cards, credit cards, and checks in the names of nominees, including Vedmurthy Sarvotham.

Conclusion

171. SA Ross, acting in an undercover capacity, was able to purchase several

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"degrees" from the Dixie and Steve Randock-controlled web sites without ever attending any classes or lectures, purchasing any books, physically meeting with any faculty, or doing any homework assignments. Based on all the above, there is probable cause to believe that Dixie Randock, Steven K. Randock, Amy Hensley, Roberta Markishtum, Blake Carlson, Richard Novak, Ken Pearson, and others engaged in violations of 18 U.S.C. §§ 1341 (Mail Fraud), 1343 (Wire Fraud), 371 (Conspiracy), 1956 (Money Laundering) and 1957 (Money Laundering), and 15 U.S.C. 78dd-2 (Prohibited Foreign Trade Practices).

172. It has been Your Affiant's experience, based on previous investigations, that evidence of violations of 18 U.S.C. §§ 1341 and 1343 are often located in written and electronic record form.

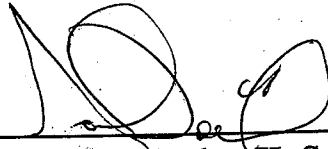
In light of the significant payments to Abdullah Dunbar, Steve and Dixie Randock's internet representations of accreditation from a foreign government, and the statements of Richard Novak during the 7/7/05 U/C meeting with Secret Service agents, and Steve and Dixie Randock's use of e-mail, evidence of violations of 15 U.S.C. § 78dd-2 are in electronic and written form. It is also the experience of SA Benscoter, IRS, that evidence of violations of 18 U.S.C. §§ 1956 and 1957 are also often located in written and electronic record form. This

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affidavit is being submitted in support of an application for a Search Warrant for not only the items but for the content of the items seized even if in electronic form.



John E. Neirinckx, II, Special Agent
United States Secret Service

SUBSCRIBED AND SWORN to before me this 10th day of August, 2005.



Cynthia Imbrogno
United States Magistrate Judge