DIPLOMA MILLS & FAKE DEGREES: A Global Problem and Threat

Welcome to ACEI e-Learning
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Degrees earned legitimately
Degrees earned through mills
Confronting Diploma Mills & Fake Degrees: A.I.M.

A.I.M.

1. Awareness
2. Information
3. Methodology
TERMS & DEFINITIONS
What is a degree-granting institution according to the USDOE?

- Any entity that offers or confers an academic, professional, or occupational degree, diploma, or certificate, if such degree, diploma, or certificate may be used to represent to the general public that the individual possessing such degree, diploma, or certificate has completed a program of education or training beyond secondary education.

Source: U.S. Department of Education
An institution of higher education is an entity that:

- requires for admission a certificate of graduation from a school providing secondary education, or the recognized equivalent of such a certificate;
- is legally authorized within such State to provide a program of education beyond secondary education;
- provides an educational program leading to
  - bachelor’s degree, or
  - provides not less than a 2-year program that is acceptable for full credit toward such a degree, or
  - awards a degree that is acceptable for admission to a
    - graduate or professional degree program, subject to review and approval by the Secretary;
- is a public or private, nonprofit or profit institution;
- is accredited by a nationally recognized accrediting agency or association;
- if not so accredited, has been granted pre-accreditation status by such an agency or association recognized by the Secretary for the granting of pre-accreditation status with assurance that the institution will meet the accreditation standards within a reasonable time.

Source: U.S. Department of Education
The Higher Education Opportunity Act defines a diploma mill as follows:

A. **DIPLOMA MILL** - The term 'diploma mill' means an entity that—
   (i) offers, for a fee, degrees, diplomas, or certificates, that may be used to represent to the general public that the individual possessing such a degree, diploma, or certificate has completed a program of postsecondary education or training; and
   (ii) requires such individual to complete little or no education or coursework to obtain such degree, diploma, or certificate; and

B. lacks accreditation by an accrediting agency or association that is recognized as an accrediting agency or association of institutions of higher education (as such term is defined in section 102) by--
   (i) the Secretary pursuant to subpart 2 of part H of title IV; or
   (ii) a Federal agency, State government, or other organization or association that recognizes accrediting agencies or associations.
The GRADE Method™ provides the following definitions of Recognition and Legitimacy:

- "Recognition" is based fundamentally on the concept of "transferability", or the level of acceptance of an institution's programs, or a specific program, by other educational institutions and/or professional licensing/registration bodies, for purposes of meeting entrance requirements or transfer credit.
  - Recognition typically signifies a high level of transferability and conversely, documented evidence of transferability can be used to prove or question the recognition of an institution or program.

- "Legitimacy" refers to the general level of acceptance / trustworthiness, of a Recognition Body, or may be used interchangeably with “recognition” to describe a program or school.
  - Legitimate recognition bodies will have robust vetting and quality-control policies for the programs / institutions they recognize, and not all recognition bodies are legitimate.

Source: https://www.gradedatabase.com/#/method
In order to help address issues of institutional fraud in education comprehensively, the GRADE Method™ provides the following definitions of mills:

- **An Educational "Mill"** is an entity that engages in systematic fraud by falsely promoting and/or representing a merit-based credential and/or academic process to the public without proper underlying quality-control, due diligence and/or regulatory compliance, usually for financial or political profit.

- **A "Diploma Mill"** is an entity that sells credentials and systematically misrepresents a supposedly merit-based education and or training process. A Diploma Mill lacks acceptable accreditation/recognition or temporarily gains trusted accreditation/recognition through fraudulent means. Diploma Mill programs may be offered at any educational level (secondary, post-secondary, vocational, etc.) and are not properly vetted for ongoing quality control / regulatory compliance.

- **An "Accreditation/Recognition Mill"** is an entity that systematically misrepresents a quality-control, vetting and/or approval process for academic / training institutions and programs without proper underlying due diligence and/or regulatory compliance. An Accreditation/Recognition Mill may operate at any educational level (secondary, post-secondary, vocational, etc.).

Note: Many times, fraudulent educational networks include both Diploma Mills and Accreditation/Recognition Mills operated in coordination with each other.

Source: https://www.gradedatabase.com/#/method
Who called diploma mills a “disgrace to American education”? 
Who called diploma mills a “disgrace to American education?”

a) Donald Trump
b) John Eaton Jr. [US Commissioner on Education]
c) President Barack Obama
d) Arnie Duncan [former US Secretary of Education]
b) John Eaton, Jr. (US Commissioner on Education from 1870-1886)*

*Council for Higher Education Administration (CHEA)
Domestic Problem:

- Dates back to the 1862 Morrill Land Grant Act and the Serviceman’s Readjustment Act of 1944 (GI Bill)
- Billion dollar industry
- More than 1,008 diploma mills operating, or claiming to operate, within the United States
- Currently, the U.S. is the world leader in housing diploma mills
- California, Hawaii, Washington and Florida lead the United States in the number of diploma mills making up over 40% of the total diploma mills operating within the United States
- Fake diplomas are often used by federal and state job applicants to get higher pay grade or pay raises. U.S. taxpayers pay the high cost. (2004 US GAO reported that 463 individuals received a total of $169,470.74 towards tuition and fees associated with their education)
- Safety and National Security is at Risk (In 2004, the Government Accounting Office uncovered 3 National Nuclear Security Administration managers with top-level security clearances that obtained degrees from diploma mills.)

*UK-base Verification & Background Screening Service [https://www.verifile.co.uk/]
Top 10 US locations for degree mills by state:

<table>
<thead>
<tr>
<th>State</th>
<th>Mills</th>
</tr>
</thead>
<tbody>
<tr>
<td>California</td>
<td>147</td>
</tr>
<tr>
<td>Hawaii</td>
<td>98</td>
</tr>
<tr>
<td>Washington</td>
<td>91</td>
</tr>
<tr>
<td>Florida</td>
<td>94</td>
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<td>Texas</td>
<td>68</td>
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<td>New York</td>
<td>55</td>
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<tr>
<td>Arizona</td>
<td>44</td>
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<tr>
<td>Louisiana</td>
<td>42</td>
</tr>
<tr>
<td>Delaware</td>
<td>37</td>
</tr>
<tr>
<td>District of Columbia</td>
<td>33</td>
</tr>
</tbody>
</table>

Source: 2011 Report by Accredibase (UK-based Verification & Background Screening Service)

Each time a diploma mill in the US is shut down, it reopens itself either under a new name or moves its operation overseas.

- **United Kingdom** - ranks 1st in Europe as the hub for diploma mills (57% of European diploma mills operate in the UK)
- **Pakistan** – hub for the biggest counterfeiting ring run by Axact
- **Liberia** – Ministry of Education and government officials in cahoots with St. Regis University (Diploma Mill with roots in the US)
- **Canada** – law enforcement uncovered a ring of counterfeiters creating fake diplomas, passports, visas and ID cards
- **Australia** – large number of candidates applying for medical professions determined to have fake medical degrees
- **Singapore** – reporting a recent jump in phony diplomas
- **Kenya** – officials state that many serving in government and military boast fake degrees
GLOBAL PROBLEM

- **Singapore** – reporting a recent jump in phony diplomas
- **Kenya** – officials state that many serving in government and military boast fake degrees
- **Kuwait** – Ministry of Higher Education taking legal action against holders of degrees from diploma mills.
- **UAE, Saudi Arabia, Oman, Bahrain** – Reporting a surge in seeing people with degrees from diploma mills.
- **UAE** – Ministry of Education is also debunking the “Middle East Office of Academic Regulation and Examination” as a fake accreditation body in the Middle East.
Top 10 European locations of diploma mills by country:

United Kingdom 339 mills
Italy 43 mills
Belgium 36 mills
Netherlands 34 mills
Switzerland 21 mills
Ireland 20 mills
Germany 13 mills
Spain 12 mills
Austria 11 mills
France 11 mills

WHY ARE THERE DIPLOMA MILLS?

Supply & Demand

- Competitive domestic and global job market encourages more job applicants to get degrees from diploma mills without having to attend any classes and complete coursework.

- Qualifying for state and federal government jobs, pay rankings and raises require college degrees and higher positions required advanced degrees such as Master’s and Doctorates.

Limited/No Regulation

- Absence of regulation on a federal level and lax or no regulation at the state levels.

- The USDOE does not have direct power to regulate educational institutions and the quality of their degrees.

- Currently there is no federal law that directly classifies diploma mill operations or someone obtaining such a degree as illegal.

- Loop holes that allow a diploma mill to operate as a tax-exempt religious institution without accreditation by one of the recognized accreditation boards

- The term “university” is not legally protected on a national level.

- The U.S. does not have a federal law that would unambiguously prohibit diploma mills.
THE CRIME SCENE
The Villains
- People who run the mills media
- World of law enforcement
- People who buy and knowingly use fake degrees

The Victims
- Unsuspecting buyers
- Employers
- Public
- Legitimate schools
THE VILLAINS:

PEOPLE WHO RUN THE MILLS
Thomas James Kirk II

**Crime:** Operated several diploma mills, including LaSalle University in Mandeville, LA (not to be confused with La Salle University in PA), the University of San Gabriel Valley, Southland University, and Bienville University. Kirk's "LaSalle University" was shut down in 1996 after an FBI raid.

**Sentence:** Kirk was indicted for fraud in 1996 and, after a plea agreement, was sentenced to five years in U.S. federal prison.
Shoaib Sheikh (center), CEO of Axact

**Crime:** Ran the largest diploma and accreditation mill in Karachi, Pakistan. Made millions of dollars/year through online sale of fake degrees. According to NYT investigations, Axact’s main business was "to take the centuries-old scam of selling fake academic degrees and turn it into an Internet-era scheme on a global scale."

**Sentence:** Charged with tax evasion after Axact offices were raided by Pakistani law enforcement and its CEO and executives were arrested.
MBA from Diploma Mill by Axact

Source: NYT
Website of Diploma Mill created by Axact

source: NYT
US Dept State forged by Axact

Source: NYT
Perpetrators: Dixie Randock and Steven Randock
Richard Novak

Crime: An American fraud ring operated approximately 120 connected institutions from about 1999 until 2005, most famously known for St. Regis University in Liberia. was shut down by U.S. government authorities.

Sentence: Novak and the Randocks were arrested; Novak agreed to cooperate as a government witness. The Randocks pleaded guilty to charges of conspiracy to commit mail and wire fraud and in 2008, were each sentenced to 3 years in federal prison.

References:

- http://www.hep.uiuc.edu/home/g-gollin/pigeons/pearson_plea_agreement_1_13.pdf
- http://www.hep.uiuc.edu/home/g-gollin/pigeons/USA_press_release.htm
• **Trump University** – offering graduate, post-graduate and doctoral degree programs, has no regional accreditation, is under investigation for fraud, and sued by NY Attorney General for operating as a university without a state charter.

• **Legacy Business School** – Kris Jenner is its Chairman of the Board, offers “white-glove executive elite” business education for $100,500.00. Office is in Trump Tower, NYC. [https://legacyny.org](https://legacyny.org)
THE VILLAINS:  
PEOPLE WHO BUY & USE FAKE DEGREES
Chester (adorable pug)

**Employment:** Four-legged companion to human and undercover agent in a sting operation pulled off by GetEducation.com to bust diploma mills

**Academic Degree:** MBA from Rocheville University claiming accreditation by 2 accreditation mills (Board of Online Universities Accreditation and Universal Council for Online Education Accreditation)
Laura Callahan

**Employment:** Deputy Chief Information Officer at US Dept of Homeland Security; Senior Information Technology Manager at the White House. Has access to overs the US Department of Labor’s $240 Million budget and managed databases containing key information on terrorism and U.S. security.

**Academic Degrees:** PhD Computer Science from Hamilton University, based in WY. (2003, her degree was found to be from a diploma mill)

**Decision:** Callahan resigned on March 26, 20024. She was never charged or convicted.
Antoine Zahra

**Employment:** former member of Lebanese parliament

**Degrees:** Diploma in Business Studies from the University of Harrington.

**Decision:** The university had turned out to be one of the 27 unaccredited institutions connected to the US-based University Degree Program. Was not charged/convicted.
Sven-Otto Littorin

**Employment** – former Swedish Minister for Employment

**Degree:** MBA from Fairfax University, a diploma mill.

**Decision:** Resigned, not charged/convicted
Barry McSweeney,

Employment: A biochemist; appointed Chief Science Advisor in June 2004, fresh from running the European Commission's Joint Research Centre (JRC), where he managed 2500 staff across 7 institutes. Also responsible for the EU's Marie Curie mobility program. Previously served as director of BioResearch Ireland, and had broad industrial experience.

Degrees: Bachelor's degree from University College Cork, and a Masters degree from Trinity College Dublin (both are legitimated institutions). PhD from Pacific Western University in Los Angeles.

Decision: Pacific Western University (PWU) was featured in a GAO investigation into federal employees who gained degrees at "diploma mills and other unaccredited schools." Not charged or convicted.
Renee Drouin

**Employment:** Sat on an advisory committee at the US Departments of Treasury and Education (2004) and was Chief Executive Officer of New Hampshire Higher Education.

**Degrees:** Degrees from Kensington University and La Salle University (Louisiana).

**Decision:** Both Kensington University and La Salle University (LA) were found to be diploma mills. Stepped down from position, but was not charged or convicted.
Charles Abell


Degrees: Master’s degree from Columbus University

Decision: Columbus University was found to be an unaccredited university classified as a diploma mill. Not charged or convicted.
And the list of buyers of fake degrees goes on…

Source: The Spokesman-Review, Tuesday, July 29, 2008

• **Timothy Francis Gorman** - NASA employee, bought an electrical engineering degree using his e-mail account at the Jet Propulsion Laboratory to correspond with the diploma mill

• **Frank S. Govern** – U.S. Department of Health oncology expert, purchased a doctorate in health care administration.

• **David W. Barden and Barry A. Hester** – National Security Agency (NSA) employees both bought degrees. Hester, was a computer Web trainer and designer for the NSA with top-secret clearance, paid $1,187 for an information systems and technology degree.

• **Eric Gregory Cole** - Contract employee for the Central Intelligence Agency, paid $3,801 for a degree in information systems management. His top-secret clearance at the CIA was revoked.
Source: The Spokesman-Review, Tuesday, July 29, 2008

- **David F. Brodhagen** – U.S. marshal purchased degree from St. Regis University (Liberia), was forced into early retirement and was charged criminally as an outgrowth of the case against St. Regis.

- **Michael Cameron** – Deputy U.S. marshal purchased degree from St. Regis University.

- **William R. Church** - Senior military adviser working in the White House paid $5,400 for a doctorate in network engineering

- **George Michael Navadel** – U.S. State Department computer systems negotiator paid $5,400 for a doctorate in network engineering.

- **Duwayne Huss** – Employee of Nuclear Management Co., operator of two nuclear plants in Minnesota, bought degrees in nuclear engineering and accounting.
Duwayne Huss – Employee of Nuclear Management Co., operator of two nuclear plants in Minnesota, bought degrees in nuclear engineering and accounting.

Author Bonita E. Broyles – Author of series of books about prescription dosages and nursing care, bought a doctorate in education for $2,225.

Richard J. Caverly - Paid $236 for a degree in construction management before getting a job in May 2006 as a building inspector with the city of Spokane. Worked as a temporary building inspector before getting a job in December 2006 as a project employee, tracking down construction under way without a permit. He was later “released” from that job.

Brett C. Jarmin - Paid $1,041 for a bachelor of science degree in criminology and criminal justice. Jarmin had worked as chief of police in Edgemont, S.D. He was fired in October 2000 after helping his department to unionize. He later sued Edgemont city officials, settling out of court in 2006.

Source: The Spokesman-Review, Tuesday, July 29, 2008
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- **Brett C. Jarmin** - Paid $1,041 for a bachelor of science degree in criminology and criminal justice. Jarmin had worked as chief of police in Edgemont, S.D. He was fired in October 2000 after helping his department to unionize. He later sued Edgemont city officials, settling out of court in 2006.

- **Michael J. Hoilien** – Worked for the Air Force in Fayetteville, N.C., bought a medical degree. Current employment status cannot be immediately confirmed.

- **Alan P. Hernandez** – Police officer in San Antonio, paid $2,630 for a bachelor’s and a Ph.D. in criminal justice, then went to work as an adviser and counselor for one of the Randocks’ (of St. Regis University fame) bogus online universities.
Source: The Spokesman-Review, Tuesday, July 29, 2008

- **Roger L. Anderson & Karen R. Jones-Anders** – Married couple, enlisted in the military, bought counterfeit degrees from Texas A&M – one of 66 legitimate universities whose diplomas were copied and sold by a diploma mill in Spokane, WA. With their degrees, they became officers but now may face courts-martial or ouster from the military.

- **Marilyn Clark Kennedy** – Worked as director of health services for the Barstow, Calif., School District, purchased bogus degree.

- **Bruce Yampolski** – Director of operations for the Department of Health in St. Louis, Mo., purchased bogus degree.

- **John G. Simmers** - Employed by Virginia’s Department of Corrections, paid $2,682 for three degrees. It couldn’t be confirmed if he used the degrees for job promotions, pay increases or a boost in retirement checks.
Last but not least...

Source: The Spokesman-Review, Tuesday, July 29, 2008

- **Bart G. Anderson** – Superintendent of a school district in Columbus, Ohio, bought a doctoral degree in public administration

- **Douglas Lane Gill** – Worked as an ROTC instructor for the Norwalk Public Schools in Bridgeport, Conn., bought two degrees. Investigators are attempting to determine whether Gill was reimbursed by the federal government for the $1,431 he paid for his advanced education.

- **Remah Moustafa Ahmed Kamel** - 43-year-old Saudi Arabian, bought degrees in obstetrics and gynecology, but investigators don’t know whether he’s practicing in those medical fields in his home country.

Cracking the diploma mill scams
WHAT TO LOOK FOR IN DETECTING MILLS

You might be dealing with a diploma mill when...

Website:
- Poorly designed & cluttered with ads by other online vendors
- Shares IP & physical addresses as other bogus universities (means they are hosted on the same server, operated by the same person or group of people)

Accreditation / Recognition:
- Claims accreditation with several accrediting agencies to sound impressive.
- Lists accreditation by accreditors that are not recognized by the U.S. Department of Education.
- Implies official approval by mentioning state registration or licensing.
- The accreditation it claims is with a board that has the same address as the diploma mill
- Claims accreditation by a so-called accreditation body in another country or micro-nation other than the country where it is based or registered to operate
Name and Address:

- Name is similar to well-known reputable universities
- Has no physical address but box numbers or suites

Degree Programs & Timelines:

- Promises short timeframe to get degree (48 hours, 5 days, etc.).
- Places unrealistic emphasis on offering college credits for lifetime or real world experience.
- Has no in class or online instruction or interaction with professors
- Has no final examinations
- Allows you to choose date of graduation

Tuition & Fees:

- Charge tuition on a per-degree basis, or discounts for enrolling in multiple degree programs
- Pushy sales force soliciting their products through aggressive spam and advertising tactics
WHAT CAN WE DO?
The GRADE Method™ recommends the following outcomes for assessment of Recognition and Legitimacy:

- Officially Recognized / Legitimate
- Unofficially Recognized / Legitimate
- Unrecognized
- Substandard
- Confirmed Fraudulent / Mill
- Undetermined

Source: https://www.gradedatabase.com/#/method
The GRADE Method™ recommends the following minimum steps for assessing recognition of education programs and schools:

1. By default, a program / institution's recognition is considered "undetermined" if no investigation has been done, or "unrecognized" as long as any investigation provides no evidence of recognition, substandard operation, or fraud;

2. Identify and document evidence (or a lack thereof) that a program / institution is recognized directly by a legitimate recognition body, over time - this evidence can be used to determine that an institution or program has "official recognition";

3. Identify and document evidence (or a lack thereof) of an institution's or program's transferability into other institutions' programs believed to be recognized, over time - this evidence can be used to determine that an institution or program has "unofficial recognition";

4. Identify and document evidence of "substandard" operation of an institution and/or program, specifically including transparency issues (lack of published information regarding location, program content, faculty and/or staff), misrepresented affiliations with other organizations, affiliations with other organizations believed to be substandard and/or fraudulent, blacklisting by other organizations believed to be legitimate, loss of official recognition, and/or substantial lawsuits against the institution / program - this evidence can be used to determine that an institution or program is "substandard";

5. Identify and document evidence of systematic institutional fraud associated with a program / institution through direct investigation, published investigation by others, blacklisting by other organizations believed to be legitimate, and/or substantial lawsuits against the institution / program - proof of systematic misrepresentation of a supposedly merit-based education and or training process is required to confirm that an institution or program is "fraudulent / a mill".

Source: https://www.gradedatabase.com/#/method
The GRADE Method™ recommends the following minimum steps for assessing legitimacy of recognition bodies:

1. By default, a recognition body’s legitimacy is considered "undetermined" if no investigation has been done or as long as any investigation provides no evidence of legitimacy, substandard operation, or fraud;

2. Identify and document evidence (or a lack thereof) that a recognition body is authorized / empowered directly through governmental involvement and/or legislation (over time) - this evidence can be used to determine that a recognition body has "official legitimacy";

3. Identify and document evidence (or a lack thereof) that recognition body's recognition is respected / honored over time by institutions known to be recognized or by other recognition bodies believed to be legitimate - this evidence can be used to determine that a recognition body has "unofficial legitimacy";

4. Identify and document evidence of a recognition body's "substandard" operation, specifically including transparency issues (lack of published information regarding location, program content, leadership and/or staff), misrepresented affiliations with other organizations, affiliations with other organizations believed to be substandard and/or fraudulent, blacklisting by other organizations believed to be legitimate, loss of official legitimacy, and/or substantial lawsuits against the institution - this evidence can be used to determine that a recognition body is "substandard";

5. Identify and document evidence of systematic institutional fraud associated with a recognition body through direct investigation, published investigation by others, blacklisting by other organizations believed to be legitimate, and/or substantial lawsuits against the institution - proof of systematic misrepresentation of a quality-control, vetting and/or approval process for academic / training institutions and programs is required to confirm that a recognition body is "fraudulent / a mill".

Source: https://www.gradedatabase.com/#/method
REPORT FRAUD!

Federal Trade Commission (FCC)

• File a fraud/scam report https://www.ftccomplaintassistant.gov/#crnt&panel1-1

Federal Trade Commission (FTC)

• Pressure the Federal Trade Commission to act on its 1998 ruling that regulates the use of the word “accredited,” and to enforce it against those that are not;

State Representatives

• Alert state representatives and the media when a legitimate school finds its name maligned by a bogus school;

• Work together for the passage of meaningful legislation and the enforcement of existing laws

Media

• Alert media when a legitimate school finds its name maligned by a bogus school

• Boycott advertising or threatening not to advertise in print or online media where bogus schools are also advertising;

• Take action by notifying the editor, publisher or Internet site provider of magazines, publications and websites in which bogus school advertise and inform federal, state and local authorities;

• Educate the public through media.
Steps to take to fight diploma fraud (cont.)

UNITE AGAINST FRAUD!

- Support the formation of a consortium of legitimate universities, businesses and non-profits to work together tackling educational fraud.

- The Association of International Credential Evaluators (AICE) has a system in place for archiving and reporting credentials fraud. School representatives may join AICE as Affiliate Members.

  www.aice-eval.org

- School recognition and recognition body legitimacy is tracked in the GRADE Database™, where users can access data and report fraud. As of July 2016, GRADE™ includes profiles for over 1,300 unrecognized, substandard and fraudulent institutions.

  www.gradedatabase.com
http://diplomafraud.com/tag/online-degree-mills/page/9/

http://nyti.ms/1ERy5mO

Council for Higher Education Accreditation (CHEA):

List of unaccredited institutions of higher education:

List of accreditation mills:
https://en.wikipedia.org/wiki/List_of_unrecognized_higher_education_accreditation_organizations

U.S. Higher Education Act:
http://legcounsel.house.gov/Comps/HEA65_CMD.pdf


H.R.4535 - Diploma and Accreditation Integrity Protection Act of 2009

Legislation introduced by the 2 representatives:

Federal Trade Commission:
https://www.consumer.ftc.gov/diplomamills

FTC – Report Fraud/Scams:
https://www.ftccomplaintassistant.gov/#crnt&panel1-1
Confronting Diploma Mills & Fake Degrees: A.I.M.

1. Awareness – appreciate the scope of this problem.
2. Information – locate, gather, store and share important data.
3. Methodology – have a system for assessing educational entities.
THIS CONCLUDES YOUR ONE-HOUR EXECUTIVE MBA COURSE.

Be Boring
$ = Good
Remember to embezzle!

ON YOUR WAY OUT, PICK UP A DIPLOMA FROM THE LASER PRINTER AND FILL IN YOUR NAME.

REMEMBER, YOUR DEGREE CAN BE PRESTIGIOUS IF NONE OF YOU EVER DISCUSS WHAT HAPPENED HERE.
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QUESTIONS & ANSWERS

Thank you!