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2 Eastern District of Washington
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6 UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
7

8 UNITED STATES OF AMERICA,)

9 Plaintiff,)

10 vs.)

11 ROBERTA LYNN MARKISHTUM,)

12 Defendant.)
13

CR-05-180-7-LRS

United States' Objections to
Presentence Investigation
Report

14
15 Plaintiff, United States of America, by and through James A. McDevitt,
16 United States Attorney for the Eastern District of Washington, and George J.C.
17 Jacobs, III, Assistant United States Attorney for the Eastern District of
18 Washington, submits the following Objections to the Presentence Investigation
19 Report ("PSR"), dated May 19, 2008. The United States objects to the PSR's
20 failure to include the following information in the Offense Conduct section.

21 Beginning in or about 2002, the Defendant was employed at AEIT, Inc., by
22 Defendants Dixie Ellen Randock and Steven Karl Randock, Sr. The Defendant
23 printed false and fraudulent academic products that the Defendants Randock sold
24 to consumers. The Defendant printed degrees and transcripts that were backdated
25 for consumers. The transcripts that the Defendant printed indicated the academic
26 credential, graduation date, and academic course work could be verified by
27 contacting the Official Transcript Verification Center or the Official Transcript
28 Archive Center at (202)-478-0699 or (877)-736-0812. She used the email address,

1 printer@university-services.net. The Defendant printed false and fraudulent
2 academic products on a daily basis. She used the aliases “Jennifer Greene” and
3 “Roberta Greene” when communicating with schools, businesses, and employers
4 in the private and public sectors who would contact the Official Transcript
5 Verification Center or the Official Transcript Archive Center (two businesses
6 owned by Defendants Dixie Ellen Randock and Steven Karl Randock, Sr.) who
7 were seeking to “verify” a Saint Regis University, James Monroe University,
8 Robertstown University, degree, or a degree issued in the name of another
9 university, that Defendant Dixie Ellen Randock and her staff had sold. The
10 Defendant also concealed from employers and prospective employers who were
11 attempting to verify the legitimacy of a degree that had been purchased from Dixie
12 Ellen Randock and Steven Karl Randock, Sr.’s diploma mill business the true
13 nature and location of Dixie Ellen Randock and Steven Karl Randock, Sr.’s
14 Official Transcript Verification Center (OTVC) and Official Transcript Archive
15 Center (OTAC). OTVC and OTAC were not independent and legitimate entities
16 that had offices and a staff in Washington, D.C. or Wilmington, Delaware. In
17 reality, the Wilmington, Delaware and Washington, D.C. addresses for the Official
18 Transcript Verification Center and the Official Transcript Archive Center were
19 nothing more than mail forwarding addresses established and used by Dixie Ellen
20 Randock and Steven Karl Randock, Sr.

21 A. *The Defendant Affirmatively Conceals Her Knowledge of a Crime to*
22 *the United States Department of Veterans Affairs and, Concealing*
23 *Her True Identity, She Verifies a University of Maryland Degree*
which Dixie Ellen Randock and Steven Karl Randock, Sr.’s Diploma
Mill Business Manufactured and Sold to “D.F.”

24
25 On September 10, 2001, an individual in Bamberg, Germany, and identified
26 by the initials “D.F.” submitted an application form to evalu@advancedu.org for
27 the purpose of having his life experiences “evaluated” and to determine if those
28 experiences qualified him for a Bachelor of Arts degree in Criminal Justice,

1 Business Education, Physical Education, Accounting, and General Studies. On
2 September 11, 2001, "D.F." sent by facsimile from Germany to "Fr. Patrick" in the
3 State of Washington, several documents setting forth "D.F.'s" military experience
4 and academic background. On September 15, 2001, Amy Hensley using the false
5 identity "Fr Timothy" and the email address ["FR.Timothy@advancedu.org"](mailto:FR.Timothy@advancedu.org)
6 transmitted the following email captioned "Degree Evaluation Results" to "D.F.'s"
7 email address, notifying "D.F" that:

8 Based on information provided by you, and by Virtue of their
9 Authority, The Regents of the Peer Advisory have determined that
10 knowledge and proficiency has been demonstrated to meet this
11 institution's equivalency of required curriculums to confer any or all
12 of the following Degree, Rank and Academician Status of:

13 Bachelor of Science in General Studies
14 Bachelor of Administration in Accounting
15 Master of Business Administration in Public Administration
16 Master of Science in Criminal Justice

17 Our Peer Advisors are pleased to inform you that the evaluation of
18 your experience has resulted in the equivalency of required curriculum
19 for the following Certificates in:

20 Professor of Criminal Justice
21 Crime Prevention Consultant
22 Organizational Management Counselor
23 Youth Leadership & Guidance Policy Consultant
24 Crime Reduction & Property Loss Prevention Counselor

25 Includes professional engraved and sealed 14 x 11 Diploma,
26 Laminated Wallet Diploma, Transcript, Matriculation History,
27 Graduation Letter, "Thank you Award," Document Portfolio and US
28 Verification Service.

**YOU MAY BEGIN USING YOUR PEER DEGREE TITLES
IMMEDIATELY UPON ACCEPTANCE.**

PRINTING & PREPARATION FEES:

29 You may have Documents professionally engraved and sealed, plus
30 you may archive and activate your verification service ONLINE or by
31 FAX at <https://secure5.marketrends.net/advancedu>
32 OR to receive directions for Bank/Wire Transfer or Phone Payment,
33 by email to admin@advancedu.org

**DOCUMENT PRINTING & PREPARATION FEES ARE ALSO
POSTED AT THE PAYMENT SITE:**

34 \$290 Certificate Level Degree
35 \$390 Associate Level Degree
36 \$390 Bachelor Level Degree
37 \$525 Master Level Degree
38 \$950 Doctorate, PhD Level Degree
\$850 Combination Bachelor/Master Degree
\$1,290 Combination Master/PhD Degree
\$1,500 Combination Bachelor/Master/PhD Degree
\$390 Adjunct Professor - *Bachelor Degree req.
\$400 Junior (Associate) Professor - *Master Degree req.

1 \$500 Full Professorship - *Doctorate Degree req.
2 \$450 High School Diploma/Home School Diploma
3 This fee is for document production and verification service. There
4 are no other fees other than shipping.
5 Shipping
6 + \$36.00 for one degree or certificate
7 + \$15.00 for each additional degree or certificate
8 If you have further questions, please feel free to contact us at anytime
9 at evalu@advancedu.org
10 Respectfully,

11 Fr Timothy

12 On November 6, 2001, "D.F." submitted an online form to Dixie Ellen
13 Randock and Steven Karl Randock, Sr.'s diploma mill internet site notifying them
14 that he agreed to purchase a Bachelor of Science degree in Criminal Justice for
15 \$426, including \$36 for shipping, that his "advisor" "Fr. Timothy" could select the
16 month of graduation, and in the form's "comments" section, that he wanted the
17 degree to be issued in the name of the University of Maryland. On December 3,
18 2001, Amy Hensley received a check (# 1010) from "D.F." in the amount of \$426
19 at AEIT, Inc.'s business address at N. 14525 Newport Highway, Mead,
20 Washington. On March 15, 2002, Dixie Ellen Randock, Steven Karl Randock, Sr.,
21 and Amy Hensley manufactured for "D.F.'s" use a counterfeit transcript bearing
22 the name of the University of Maryland, listing academic courses "D.F." had never
23 taken and grades he had never received. The counterfeit transcript that the
24 defendants manufactured contained the printed representation "Accredited ADLP."
25 The counterfeit transcript was backdated to reflect a graduation date of June 5,
26 1998.

27 On August 1, 2002, "D.F." completed an online form and requested Dixie
28 Ellen Randock, Steven Karl Randock, Sr., and Amy Hensley, using the email
addresses request@transcriptrecords.com and admin@advancedu.org, to mail a
counterfeit University of Maryland transcript to his employer, the United States
Army, at Groveton, Georgia, so the counterfeit transcript could be included in his
official military personnel records for educational credit. On August 1, 2002,

1 Dixie Ellen Randock, Steven Karl Randock, Sr., and Amy Hensley processed a \$35
2 credit card payment to A+ Institute, 14525 N. Newport Highway, Mead,
3 Washington, for the printing and mailing of a counterfeit University of Maryland
4 transcript to “D.F.’s” employer, the United States Army.

5 On November 15, 2004, “D.F.” represented on a Questionnaire For Non-
6 Sensitive Positions (U.S. Office of Personnel Management Standard Form 85)
7 submitted in support of his application for employment with the United States
8 Department of Veterans Affairs (VA) that, in 1998 he had received a Criminal
9 Justice degree from the “University of Maryland, 611 Pennsylvania Avenue, S.E.,
10 # 211, 20005-4303.” On December 9, 2004, “D.F.” filled out a Credential
11 Verification Form and submitted it to the United States Department of Veterans
12 Affairs representing that he had graduated from the University of Maryland on
13 June 5, 1998, had been awarded a Bachelor of Science degree in Criminal Justice,
14 that the University of Maryland could be contacted at the following address, 611
15 Pennsylvania Avenue, S.E. # 211, Washington, D.C. 20003-4303, and at the
16 following telephone numbers, 877-736-0812 or 202-478-0699, or at the following
17 fax number, 410-455-1141. On December 9, 2004, “D.F.” signed VA Form 10-
18 2850 (Authorization For Release of Information) authorizing the United States
19 Department of Veterans Affairs to make inquiries to educational institutions
20 concerning his educational background and permitting those institutions to release
21 information to VA officials. ROBERTA LYNN MARKISHTUM affirmatively
22 concealed her true identity and the fact that she was not an employee of the
23 University of Maryland to the United States Department of Veterans Affairs. On
24 January 24, 2005, the Regional Manager, Southeast Region 3A, Veterans Affairs
25 Medical Center (“VAMC”), Bay Pines, Florida, transmitted by facsimile to
26 “Jennifer” a letter that was addressed to the “University of Maryland, Office of
27 Registrar, 611 Pennsylvania Avenue, S.E. # 211, Washington, D.C. 20003-4303”
28 requesting “Jennifer” to verify the information “D.F.” had provided to the United

1 States Department of Veterans Affairs about his University of Maryland education.
2 On January 24, 2005, ROBERTA LYNN MARKISHTUM concealed her true
3 identity to the United States Department of Veterans Affairs when she ink-stamped
4 the signature “Jayne W. Johnson” on the “Official Completing Request” line on a
5 Credential Verification Form and sent the Credential Verification Form to the
6 United States Department of Veterans Affairs. ROBERTA LYNN
7 MARKISHTUM also handwrote the word “Verifications” underneath the name
8 “Jayne W. Johnson” and hand-dated the Form, January 24, 2005. As a result, the
9 United States Department of Veterans Affairs was led to believe that “Jayne W.
10 Johnson” had verified “D.F.’s” education and academic credentials. In doing so,
11 she deliberately took affirmative steps to conceal the crime of conspiracy to
12 commit wire and mail fraud.

13
14 DATED June 5, 2008.

15
16 James A. McDevitt
United States Attorney

17
18 s/George J.C. Jacobs, III

19 George J.C. Jacobs, III
Assistant United States Attorney

20 I hereby certify that on June 5, 2008, I electronically filed the foregoing with
21 the Clerk of the Court using the CM/ECF System which will send
22 notification of such filing to the following, and/or I hereby certify that I have
23
24
25
26
27
28

1 mailed by United States Postal Service the document to the following non-
2 CM/ECF participant(s):

3
4 Richard D. Wall
423 West First Avenue
Spokane, WA 99201

5
6 Wayne A. Becker
U.S. Probation Officer
United States Probation Office
7 920 West Riverside, Room 540
8 Spokane, Washington 99201

9 s/George J.C. Jacobs, III

10 George J.C. Jacobs, III
11 Assistant United States Attorney

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