

FORUM | Research in Brief

Academic Fraud and the World's Largest Diploma Mill

By Allen Ezell

Editor's Note: This is the second in a series of three articles about academic fraud. The first described the history and growth of diploma mills and counterfeit operations. This article provides an in-depth look at the operations of the world's largest diploma mill, Axact, Ltd., a criminal enterprise with more than 8 million customers worldwide that has generated several billion dollars. The third article will detail how to identify diploma mills and Axact websites.

Diploma mills and accreditation mills devalue earned degrees, confuse the public, and defraud students. The investigation into Axact's activities was conducted by the Pakistan Federal Investigation Agency (FIA), the British Home Office, Interpol, and the Federal Bureau of Investigation (FBI). Today, only the FBI continues its investigations of the company. Dozens of top Axact executives and others were arrested, jailed, held for fifteen months, tried, and sentenced to seven years for various fraud violations. None has begun his prison sentence. Several fled Pakistan successfully and have never returned; one was caught at the airport.

In October 2016, a Pakistan district judge acquitted 24 Axact officials at trial due to "not enough evidence" and then later admitted he had accepted a bribe (of \$35,209) from Axact. Although the Canadian Broadcasting Corporation aired an award-winning expose of the company in September 2017, it did not have the same impact as a later BBC story (2018). In February 2018, after the BBC published its story on the Pakistan judge's bribe, the Islamabad High Court reversed the

convictions and removed the judge from the bench. (The judge was never arrested, nor was he required to return the bribe money.) Axact defendants then went back into the Pakistan judicial system.

Several prosecutors have been abducted and "re-educated" and then promptly resigned from the case. Several judges have declined to hear these cases outright, and one is reported to have fled the country to avoid the issue entirely. When the former lead prosecutor announced that he was considering getting back into the case, a grenade was thrown at his house. Several FIA "approvers" (cooperating witnesses) have disappeared, and one Axact official was assassinated the evening before he was scheduled to have a press conference during which he allegedly intended to disclose the truth.

The Axact Empire

Since its founding in 1997 by Shoaib Ahmed Sheikh and his relatives and friends, Axact (Pvt.) Ltd., based in Karachi, Pakistan, has sold more than 8 million high school and college diplomas to buyers in 191 countries through more than 4,000 fake websites, 1,000 of which were fake school websites. In 2016, according to Farhan Kamal of the Online Education Unit, Axact entered the online education business around the year 2000. "Registration" fees were as low as \$399 for a fake diploma; others paid as much as \$200,000 to \$400,000 before the upsell. Axact's total revenues reached the billion-dollar mark in 2013–14, the company's heyday.

Revenues were laundered through at least 35 known bank accounts in nineteen countries. (Today there are likely more than 50 bank accounts in more than 20 countries, including several in the United States.) Axact had call centers in Karachi, Lahore, Rawalpindi, and Islamabad. Call center employees numbered 827 in Karachi (with 3,137 in the office); 82 in Islamabad (with 147 in the office); and 43 in Lahore (with 82 in the office). Total monthly sales goals were \$4.7 million for Online Education; \$4.7 to \$5 million for Prior Learning Assessment (PLA)/Cash On Delivery (COD), and \$5.2 to \$6.2 million from UPSELL, totaling at least \$15 to \$16 million monthly from the “education” side of the business.

Today, more than 1,200 employees in Karachi are on the 2 p.m. to midnight shift; more than 500 are assigned to the five call center teams in Online Education, Prior Learning Assessment (PLA)/Cash On Delivery (COD). Some are also assigned to web development and online chat support. Approximately 120 employees are at the Islamabad call center, with 80 on the phones. Axact’s sales figures are currently depressed due in part to their decreased internet advertising. The monthly goal is now \$7 million, with \$1.4 million from Online Education (approximately 35 percent of diplomas sold), \$1.7 to \$2.2 million from PLA/COD (approximately 65 percent of diplomas sold), and \$2.2 to \$3.2 million from UPSELL activities. (COD is only available with PLA schools.)

Call centers are staffed by talented, well-spoken young people (most of them male) with no college education. After their three-week orientation, employees choose a fake name and are given the names of one or more fake schools to represent as “registrar” (or a similar title). The Axact “Audit Department” employs “quality assurance auditors” who monitor all “registrars” telephone calls to ensure compliance with company rules and regulations. [Imagine: rules and regulations when the business itself is criminal, defrauding others!] Axact’s primary sales targets continue to be residents of nearby Gulf Region nations: As of May 2015, more than 124,000 known shipments of documents (56 percent of sales) were to the Gulf Region, and 65,000 shipments of documents (29 percent of sales) were to the United States. An estimated two million diplomas were sold between 2015 and 2019.

Since 2019, Axact has created at least 27 new websites. Consider the layout, design, and content of two recent fake school sites—trevorfielduniversity.edu

and nationalcreekuniversity.education, both created in early 2019.

In 2015, Axact was known to operate approximately 1,100 websites; 370 fictional high schools, colleges, and universities; 150 accreditation mills; and 400 term paper/research mill sites. According to recorded Axact calls, “Upsell” is when sales personnel impersonate local police and/or state, province, and federal authorities, including FBI agents. They also impersonate officials from the Ministry of Education, Immigration, and embassies and use extortion and blackmail to extract more money from previous diploma buyers. They use counterfeit documents, embassy certifications, and fake U.S. Department of Education emails and U.S. Department of State apostille attestations. A former Axact employee reported that the first “Upsell” was made in 2001 by a senior executive who was able to get \$2,500 from an American student by convincing him he needed additional documents to make his diploma legal. Any scheme or artifice to defraud was permissible at Axact as long as the company made more money.

In the wake of a *New York Times* article (Walsh 2015), the Pakistan Federal Investigation Agency raided the main office of Axact; all senior employees had already gone into hiding or had fled the country. Employees advised that CEO and co-founder Sheikh Shoaib Ahmed had given orders that all Axact business records should be destroyed and computer hard drives removed. (The FIA tracked down these stolen items and retrieved some for forensic analysis, which later led to destruction of evidence charges.) The FIA took approximately 75 employees for interrogation then sealed the offices.

During an hours-long interview, Sheikh shared the location of the Axact printing facility. The FIA seized printing and seal-making machines along with more than 2.2 million diplomas, transcripts, accreditation entity letterheads, and counterfeit State Department apostille attestation documents. The FIA had seized servers, computers, and massive amounts of business records during multiple raids in all three cities where Axact had offices. Bank accounts were frozen (depending on location), and the FIA brought in the organization’s top officers for questioning. The Court granted permission to seize all of Axact’s assets (*e.g.*, yacht, beach house, and the 1,100 motor vehicles registered in Axact’s name). About a year later, due to misinterpretation of a court order, the office premises were returned to Axact officials, as were the seized assets.

Legal Status of Diploma Fraud

Neither the United States nor Pakistan has federal criminal statutes outlawing the advertising, sale, issuance, possession, or use of diplomas issued by diploma mills or the issuance of false accreditation documents by accreditation mills. The United States has federal criminal statutes pertaining to wire fraud (interstate wire communications), mail fraud, and computer fraud, and these have been used successfully to prosecute diploma and accreditation mills. Pakistan does not currently have any cybercrime statutes.

Hiding in Plain Sight

New Axact employees are trained never to discuss the work they do outside the office and are warned of dire consequences should they do so. They are required to sign a non-disclosure agreement (NDA) that virtually guarantees they'll remain silent about what happens at the office. (They themselves are not told exactly what Axact's products are during orientation training.) Axact maintains a large in-house legal team to ensure that no one breaches the NDA without being sued or visited at their home by enforcers.

Some current and former employees have commented on Axact's sale of fake degrees, pornography, money laundering, and connections with organized crime. The true nature of the company's business has been an open secret in Pakistan for many years. The *New York Times* article made it even more widely known. It has long been rumored that Axact may be providing services for Pakistan's government, military, and intelligence services, including Inter-Services Intelligence.

Axact is highly litigious: The legal team is quick to obtain stay orders and to file defamation cases against websites, blogs, and newspapers. In 2003–04, the president of the Pakistan Software House Association alleged that Axact was a diploma mill. In response, Axact sued for Rs.100 million (\$704,865). Axact has punished former employees and their relatives, even with beatings and torture.

Axact hides among legitimate online education institutions, utilizing similar-looking and -sounding entities. Yet Axact is the elephant in the room, a giant “web” that utilizes fake high schools, personnel and job placement agencies, and scholarship offers to lure potential victims into its lies and deceit. For years, Axact oper-

ated somewhat openly under the umbrella of an information technology company. At Axact's “team meet” in 2013–14, Chairman Shoaib Sheikh unveiled plans for “GalAxact,” a futuristic 3.5 million square foot office complex including five 16-story office towers, a helipad, and a monorail that would enable 20,000 employees to work in a single shift (Axact 2016).

In its “Plan 2019,” Axact made public its vision of “a prosperous and thriving Pakistan”: by 2019, it would make available to every Pakistani—at reasonable prices—food, shelter, health care, education, and judicial assistance (Shaikh 2013). (The population of Pakistan is 204.73 million.) It would also donate 65 percent of its IT export revenues (of which it has none) to charity (Shaikh 2013).

Fake News

Over the last 22 years, Shaikh and his colleagues have utilized social media such as Facebook, Google Plus, LinkedIn, Crunchbase, and others in conjunction with sites such as CNN iReport, PRWeb, and more to publish free press releases that legitimize fake schools—including their student and alumni activity—and corporate pronouncements, etc. All of this activity is readily searchable.

Axact's “Project 2019” goals have not been attained. Diversion is a common tactic. Project 2019 was overshadowed by the announcement at Axact's 20th Team Meet, in 2017, of Plan 2036: Shoaib Sheikh “will make Pakistan the #1 country in the world.”

Because many Pakistanis lack potable water, dependable electricity, clean air, sanitation facilities, and honest law enforcement and judicial systems, Axact has success recruiting new employees on the basis of assurances of a better lifestyle. The company boasts a wide range of amenities that are among the best in the world: yachts, games, movie theaters, prayer rooms, club facilities, gyms, pools, clinics, libraries, kiosks, events, cafeterias, salons, ATMs, beach resorts, and clean bathrooms. It even promises to deliver generators and bottled water to employees' homes. Health insurance is also provided. Axact states, “We offer the most amazing lifestyle at your fingertips” (axact.com/news/lifestyle.asp). Salaries of two to five times the going rate are effective bait. Once employees begin working for Axact, the money proves too good to leave, with the result that most set aside their morals and religious beliefs and convince

themselves that it is acceptable to defraud Americans and others in cyberspace. Axact supervisors repeatedly tell employees that “there are no laws in cyberspace.”

Axact’s Products

Former employees report that Axact is a highly diversified criminal enterprise. It maintains websites offering fraudulent term papers, theses, dissertations, custom research, used cars, travel services, vanity publishing entities, journals, English language institutes, and logo design. Still other sites target teachers, airline employees, and engineers.

Yet fraudulent diplomas remain Axact’s core business and primary money maker. “Education” income streams include:

- ◆ **Prior Learning Assessment (PLA):** PLA represents approximately 65 percent of Axact’s education business, with between 700 and 900 fake websites baiting new customers. Among the sites are Baychester, Brooklyn Park, Columbiana, Gibson, Glenford, Hansford, Nixon, Richford, University of Granton, and University of Tulane (uot.education), to name a few. After a five- to ten-minute phone interview about prior education and work experience, customers are “qualified” for their desired degree. Axact even offers a 90 percent “Presidential Scholarship” with only the remaining 10 percent to be paid (terms typically negotiable) to obtain the degree. Axact also now offers Cash on Delivery (COD) and Graduate Now, Pay Later plans: Pay a small registration fee, then pay the balance when all of the documents (“graduation package”) arrives. (COD is only available with PLA schools, which do not have a student sign-on portal.)
- ◆ **Online Education (OE):** OE constitutes approximately 35 percent of Axact’s education business. Approximately 35 fake school websites include log-on buttons that provide access to virtual classrooms. Recorded lectures and videos are available, and online chat personnel guide students through assignments that culminate in a degree (never mind that the learning has been described as being at the “fifth-grade level”). Remember that the Axact “school official” never attended college yet guides customers through their required research, papers, correspondence, and examinations. Thus a façade of legitimate online learning disguises a diploma mill. OE sites include Al Arab, Al Nasr, Branton, Columbiana, Costa Field (uocf.education), Denton, Gatesville, Gibson, Granttown, Hadley, Must, and Myers Field (mfu.education).
- ◆ **Research and Sponsored Development:** These are the term paper and custom research sites that offer purportedly “custom” research services to the buyer. Former Axact employees advised the author that starting in spring 2002, during “exam time,” the Axact Content Department began purchasing student library IDs and log-in credentials for hundreds of U.S. college and university library websites from hackers and scammers in Pakistan, China, Philippines, and Turkey as well as from the “Dark Web.” This data was used to steal content from library publications that it then sold to its “research customers.”
- ◆ **The “Upsell”:** Soon after a degree and transcript are sold to a customer, the “upsell agent” calls to advise that the diploma and transcript need to be “legalized” through their embassy or ministry of higher education in order to be valid. This required process allegedly adds value to the educational credentials. On occasion, Axact may even recommend transferring credits to a new school because it enjoys a “higher standing.” (I received such an email and telephone call regarding the 2017 Hill University diploma I obtained as a private consultant for a client after retiring from the FBI.) Historically, Axact did not upsell U.S. residents.

Axact profits from the sale of diplomas from more than 1,000 fictional schools by more than 900 salesmen and brokers with weekly goals of at least \$1 million. In 2014 and early 2015, Axact’s “flagship” schools were Must University (which used a mail drop address on Market Street in San Francisco) and Paramount California University (which uses an address in Irvine, California). Axact sales techniques feature phrases such as “advance your career with a global degree,” “executive education program,” and a \$5,000 “exclusive referral discount.” Axact also created a search engine optimization (SEO) department to ensure that Axact schools and other products appear at the top of online search results. Axact also had a group of employees working on “proxy student services” whereby students enrolled at legitimate U.S. institutions were invited to send all their academic assignments to Axact throughout the school year. Axact would then conduct the necessary research, prepare the assignments, and use “spoof-

ing” technology to forward them to the professor as if they were being sent directly by the student—all for a \$40,000 fee.

Identifying Axact Websites

Axact’s (“Vintage 1”) first fake school websites were simplistic, and little effort was given to making the schools appear real. “No books, no courses, no classes” coupled with “check out our sample diplomas and more” and a listing of the “graduation package fees” told the buyer everything he needed to know. “All graduation packages include the following: 1 standard framed diploma, 1 unframed diploma, letter of recommendation, transcript, school ID” all for \$375 (associate) to \$450 (Ph.D./doctorate), with the bachelor’s/master’s/Ph.D. triple combo for \$825 and “delivery in 10 days or less.” See, for example, the websites for Belford High School, Belford University, Rochville University, Lorenz University, Woodfield University, and Belltown University. It is unclear why Axact officials have continued to offer the Vintage 1 package. Just within the past 120 days, Axact established three new websites: InstantDegreesInGulf.com, ArabInstantDegrees.com, and GCCInstantDegrees.com; visitors are promised “100 percent approval,” and samples of school documents are displayed.

Axact schools’ websites (other than those for Vintage 1 schools) look professional and feature stock photos, student models, and fantastic graphics. Most Axact sites have the following traits in common:

- ◆ Older sites have a .com extension.
- ◆ Accreditation mill sites have the .org extension.
- ◆ Beware of .us extensions.
- ◆ The newest schools (within the past year) have .education extensions. (Occasionally .edu is used as part of a school name rather than as an extension.)
- ◆ Rarely, Axact acquires the websites of legitimate schools that had a real .edu extension and uses them to host fraudulent schools with the same initials.
- ◆ Rarely do Axact school sites include an address of any sort.
- ◆ Deep in the site, an address that is either non-existent or a mail drop may be identified.
- ◆ Some sites feature legitimate street names of real schools but no house numbers.
- ◆ Only toll-free numbers are listed.

- ◆ The schools over-sell their legitimacy.
- ◆ A single university may feature numerous logos of supposed accrediting entities (up to eleven).
- ◆ Photos of students are stock photographs.
- ◆ The same dean, faculty members, and students are allegedly employed at numerous schools.
- ◆ “Scholarships” of 70 to 90 percent—including “presidential scholarships”—are available.
- ◆ “Exclusive scholarships” (up to 75 percent of tuition and fees) are offered to students in the United States.
- ◆ A chart listing tuition at competitor schools is displayed.
- ◆ On older sites, a “dancing green or orange box” offers 24x7 live chat with school officials. More modern sites feature an image of a woman with folded arms.
- ◆ No cost per credit hour is listed, only a flat price per degree program.
- ◆ Lifetime “verification” is touted as is U.S. Department of State apostille.
- ◆ website translation is offered for all major languages.
- ◆ Numerous awards “earned” by the school are listed.
- ◆ Tuition ‘fee reduction methods’ are touted, ranging from 7 to 20 percent.
- ◆ A disproportionately large number of enrolled students and alumni are listed for a relatively new school.
- ◆ An excessive number of departments is listed.
- ◆ Domain registration is hidden under a third-party privacy registration.
- ◆ Logos of graduates’ nationally known employers are prominently displayed but with no student names; thus, the content is colorful and impressive but impossible to verify.

Frequently cited statistics relative to the school, faculty, and graduates/students include:

- ◆ 70 percent of faculty hold Ph.D.s in their fields.
- ◆ 70 majors are offered by sixteen diverse schools.
- ◆ 80 percent of alumni work for Fortune 500 companies.
- ◆ “employability” to 100 percent soon after receipt of degree.

Innova University touts its Presidential Scholarship with eligibility criteria “so minimum that 90 percent of applicants qualify.”¹ It also provides a “substantial fee waiver” of 20 percent if tuition is paid in one single payment or “9 percent if paid in two installments.”² Innova University is one of the very few “schools” with a physical address: 2711 Centerville Road, Wilmington, Delaware 19808. In fact, this is the address for Corporate Service Company, which appears to be a third-party company that prevents direct access to identification of its corporate clients.

Another overt novelty on Axact school websites is the offer to become a Certified Educational Associate (broker); a companion chart displays your “Earnings Potential for Online Degree Programs” with blocks reflecting the color of the metal (silver 40 percent, gold 50 percent, and platinum 75 percent) for “commission on our online academic programs.” In other words, depending on your volume of business, a university will kick back the tuition percentages once your referred students pay their tuition. This chart has appeared on numerous sites, including Carden, Gatesville, Port Jefferson, and Martinville Universities.

Political Climate Giving Rise to Axact

Several incidents in Pakistan and neighboring countries may have played a role in the growth of Axact. In 2002, President Pervez Musharraf issued an executive order establishing the new minimum education requirement of a bachelor’s degree for any member of the National Assembly (MNA), the lower house of Pakistan’s Parliament. This new order effectively disqualified nearly 60 of the 107 MNAs elected in 1997 (Afzal 2013). In response, many MNAs obtained fictitious academic credentials.

In 2012, Syed Ahsan Shah, Provincial Minister for Industries, was disqualified by the Balochistan High Court for possession and use of a fake degree. When questioned, he commented, “A degree is a degree! Whether fake or genuine, it’s a degree! It makes no difference” (Khan and Toosi 2010).

Investigations into diploma mills were also launched in surrounding areas. In 2013, the Education Ministry in Saudi Arabia began a campaign against fake cre-

entials, identifying nearly 620 government employees using fake bachelor’s, master’s, and doctoral degrees (GEO TV 2013). The Central Bureau of Investigation in India advised the court that “51,156 fake degrees have been issued in the state,” many of them to obtain jobs in higher education (Vyas 2010). As many as 25,000 of India’s 350,000 primary school teachers are estimated to be using fake credentials. At least 1,400 primary school teachers in India resigned in 2015 during an amnesty period.

From 2010 until 2015, authorities in China also conducted sting operations regarding fraudulent academic credentials. One resulted in the arrests of at least 67 ESL and TEFL expat teachers and recruiters on the basis of their possession of fake diplomas and TEFL certificates (ESL 2016). Reports in 2013 indicated that China has more than 100 universities that do not have proper accreditation or permits. Lists of diploma mills have been posted by ShangDaxue.com (Floracruz 2013). These and other types of fraudulent documents are sold openly on streets in China.

Media Attention and Court Cases

In May 2008, Axact filed a lawsuit in U.S. District Court in New Jersey against Student Network Resources, Inc. (SNRI), “an academic and business-related research service.” Axact alleged “defamation, trade libel, copyright, false advertising, and unfair competition by SNRI.”³ Axact employees had been stealing SNRI research papers on the Internet then selling them as their own. SNRI did its due diligence (through several “controlled buys”) then advised the court that Axact was a fraud, had lied to the court, owned at least 300 websites and at least 544 term paper sites, had links to prostitution, and owned or controlled non-existent universities (including Belford, Rochville, and Ashwood Universities).

After the attorney representing Axact apologized for the false statements made to the court, Axact decided not to contest the matter any longer. In January 2009, the Court entered a default judgment of \$353,373 against Axact plus \$36,720.40 for attorney fees. In retaliation, Axact sued SNRI in Pakistan Court, a common tactic of fraudulent companies—one where the outcome can be controlled.

¹ See innova.university/tuition/scholarship/

² See innova.university/tuition/fee-payment/

³ See law.justia.com/cases/federal/district-courts/new-jersey/njdce/3:2007cv05491/208337/31/.

In November 2009, the U.S. District Court (USDC) in Detroit, Michigan, heard Elizabeth Lauber, *et al.*'s civil suit against Belford High School. Eventually the suit became a class action suit representing 30,000 victims who had purchased Belford High School diplomas and GEDs. Belford High School was charged with violating the Racketeer Influenced Corrupt Organization (RICO) statute. Salem Kureshi testified via video from Karachi, Pakistan, that he owned Belford High School and Belford University and managed their operations from his apartment. Kureshi stated that he was in no way affiliated with Axact. In August 2012, the court awarded \$22,783,500 to the plaintiffs. No money was collected at that time, but after the May 2015 *New York Times* expose (Walsh 2015), monies were seized from various Axact accounts. Kureshi was determined to be a low-level Axact employee and the video testimony fake. When FIA raided Axact, Kureshi cooperated and became an "approver" (government witness). His current whereabouts are unknown.

A civil suit is currently pending in Superior Court of the State of California regarding Paramount California University, Coronado Pacific University, and Brett Loebel of Delray Beach, Florida; Alameda University is also named.

For at least the last twelve years, Axact has been the subject of stories in the United Kingdom (*The Daily Mail*), Saudi Arabia (*Saudi Gazette* and *Compunet Arab News*), and the United States (<edualliancegroup> and *Edu Alliance Journal* along with <GetEducated.com>). None attracted as much attention worldwide as did that in the May 17, 2015 *New York Times*; it was followed by several other articles and an editorial over the next four years.

In November 2014, Sayyad Yasir Jamshaid, a former Axact employee in Karachi, requested assistance to expose Axact for fraud. He had been employed by Axact as a quality control auditor and was assigned to one of the sales teams that sold diplomas in the Gulf Region. Thinking he had been detected and fearing for his physical well-being, he had quit his job after photographing certain company records and then fled to Dubai, U.A.E. Jamshaid was interviewed for three days in UAE by *New York Times* reporter Declan Walsh and agreed to be named as a source in an upcoming expose, even knowing he was placing himself in physical danger. His family in Pakistan later bore the brunt of his cooperation. After the story was published, several other

former employees shared their stories and documents with the press and law enforcement.

Aftermath of NYT Expose

Shoaib Shaikh, founder and CEO of Axact, offered at least five different explanations after the *New York Times* story was published. Although he claimed the company was innocent (and threatened to sue the *Times*), no lawsuit ever materialized. He later admitted that Axact had issued 147 Ph.D. degrees to customers in the United Arab Emirates. Ultimately, he revealed the location of the Axact printing facility (adjacent to its main office building) and accompanied them there. After seizing approximately 2.2 million blank diplomas, transcripts, school identification cards, accreditation documents, and counterfeit U.S. State Department apostille attestations, the FIA arrested Shaikh and his co-founder, Viqas Atiq.

In May 2015, Altaf Hussain, founder and leader of the Muttahida Qaumi Movement (a secular political party in Pakistan), expressed shock and grief over the allegations. He called for an investigation and said that if the allegations were found to be true, "exemplary punishment should be given to the people involved in it so that no one could even think about committing such a monstrous fraud in the future" (Hussain 2015). Hussain demanded that names of Axact senior management be added to the Exit Control List (no-fly list) and warned that fraud should constitute a wake-up call for the nation (Hussain 2015).

The *New York Times* expose also alarmed government officials. Parliament officials ordered the interior minister to form a special committee to investigate all allegations. The length and breadth of the scandal humiliated Pakistan and kicked off a local and regional media frenzy.

The investigation resulted in FIA armed raids on Axact offices in three cities; the removal of at least 75 employees via Army trucks and police vehicles; the seizure of computers and servers and business records; and closure of Axact's offices. FIA froze bank accounts, seized 1,100 vehicles registered to Axact, and took all of its hard assets using anti-money laundering statutes. The FIA then conducted interviews with hundreds of Axact employees; more than fifteen became "approvers" and agreed to testify. These "approvers" ranged from low-level employees—call center personnel and print-

ing shop managers—to regional directors; their stories were recorded before a judicial magistrate. At least one—Umair Hamid, Assistant Vice President, International Relations—is a high-ranking official. Hamid was not arrested by FIA since he was an approver, but he continued his fake diploma activities even after the FIA shut down Aexact.

Hamid traveled to the United States in 2016 to open a bank account for a fake school. He had a business relationship with Brett Loebel regarding Alameda University. Loebel later may have cooperated with the FBI. Hamid was arrested in December 2016 in an FBI sting. After his arrest (for wire fraud), Hamid made a lengthy statement to the FBI. In April 2017 he plead guilty to having helped conduct fraud in the United States. He was charged \$140,000,000 for Aexact diploma fraud,

forfeited \$5,303,020 to the U.S. government, and was sentenced to 22 months in federal prison. In August 2018, he was deported. He is believed to be in UAE.

Conclusion

Diploma mills will always be with us—at least as long as we live in a credential-conscious society and fail to verify academic credentials. As long as the government of the Islamic Republic of Pakistan, Pakistan's ISI (Inter-Services Intelligence Agency), the people of Pakistan, and federal and province law enforcement support and condone the criminal acts of Aexact and similar entities, the reputation of Pakistan will continue to be tarnished. Pakistani officials could easily become a model for the rule of law, but that is not in evidence thus far.

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