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Phillip J. Wetzel  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	NO. CR-05-0180-LRS
	)	
vs.	)	DECLARATION OF BRIAN BREEN
	)	IN SUPPORT OF OBJECTIONS TO
	)	PRESENTENCE REPORT
	)	
DIXIE ELLEN RANDOCK,	)	
	)	
Defendant.	)	

BRIAN BREEN declares under penalty of perjury as follows:

- I am a former police officer in the city of Spokane. In that capacity, I worked in patrol division, the investigative division, and the intelligence unit. I was a homicide detective for 12 years. I wrote investigative and training manuals for the Spokane Police Department.
- I have been appointed by the court to assist Dixie Randock and her attorney, Phillip Wetzel in the preparation of the defense. In that regard, I have spent countless hours reviewing the evidence, interviewing witnesses, and discussing the case with all counsel.

DECLARATION OF BRIAN R. BREEN IN  
SUPPORT OF OBJECTIONS TO PRESENTENCE  
REPORT

- 1 Attachment A

PHILLIP J. WETZEL  
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3. I have spent countless hours reviewing computerized records, emails, and reports.
4. I am intimately familiar with all aspects of this case.
5. I have been asked to respond specifically to the presentence report at paragraph 16. The writer reports that there were 8,200 “customers” and 10,000 fraudulent degrees. However, it should be noted that the government conducted national advertising to search for the “victims” of these defendants. The government implemented a toll free number and requested that any persons who felt that they were victimized call. Of the thousands of alleged degree holders, the government received approximately only 18 calls. The majority of these calls were the result of the government specifically and individually contacting “victims” or the owners of affiliate schools and instructing them to call or have their clients call the 1-800 number.
6. I was asked to respond to paragraph 18. In paragraph 18, it is implied that the activities of these defendants allowed the issuance of inappropriate H-1B visas to foreign “victims”. Indeed the indictment alleges as much. However, there is no evidence provided in the discovery that more than one H-1B visa was issued to any of the persons who purchased degrees from these defendants.
7. I have been asked to respond to paragraph 64-76. Throughout this case, a significant issue is whether the defendants in this case bribed foreign officials to obtain accreditation. This issue was so central to the case that we spent a great amount of effort investigating it. Depositions of the relevant officials were authorized to be conducted in Liberia and would have been accomplished had this matter proceeded to trial. I was authorized to visit Liberia and in so doing I

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interviewed several former high ranking Liberian government officials with whom these defendants transacted business. Those persons were Associate Justice of the Liberian Supreme Court, Kabineh Ja'neh, former ambassador Prince Porte, former Ambassador-in-Charge, Abdullah Dunbar, and former Minister of Education Isaac Roland. All were confronted with the allegations made by Richard Novak that he bribed them and that are repeated without qualification in the PSR. All four of these men emphatically denied that they received bribes. All four readily acknowledged that they had accepted money from these defendants. However, all four explained clearly that these funds represented payments for services rendered.

- 8. It should also be noted that Dr. Isaac Roland, the former Minister of Education, stated clearly that these defendants did everything that they were asked to obtain Liberian accreditation and should have reasonably assumed they were accredited by the Liberian government. The suspension of their accreditation was not due to the defendants' actions but rather to pressure from the United States government and these defendants acted appropriately when they learned of the suspension of accreditation. Further, although the Liberian government suspended the defendants' accreditation it continued to recognize the defendants' school.
- 9. I have been asked specifically to respond to paragraph 320. The PSR writer makes the conclusory statement that Ms. Randock has a willingness to operate outside the law and moral propriety. However, in the process in this investigation, I was present at interviews of Mr. Blake Carlson, Mr. Ken Pearson, and Ms. Amy Hensley. These interviews were conducted after each of these persons had entered

plea agreements. The interviews were conducted at the offices of the United States Attorney, in the presence of the United States Attorney and the assigned investigators. All three of these individuals stated clearly and emphatically that Ms. Randock always instructed them to tell the truth and always forbade lying.

I declare under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Spokane, Washington, this 19<sup>th</sup> day of June, 2008.



Brian R. Breen

Respectfully submitted this 19<sup>th</sup> day of June, 2008.

*s/ Phillip J. Wetzel*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 19<sup>th</sup>, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

DECLARATION OF BRIAN R. BREEN IN  
SUPPORT OF OBJECTIONS TO PRESENTENCE  
REPORT

- 4 Attachment A

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- 5 Attachments A

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