

**IN THE CIRCUIT COURT OF THE SEVENTEETH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA**

**OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LEGAL AFFAIRS,
STATE OF FLORIDA,**

CASE No.:

Plaintiff,

v.

**DIVERSIFIED EDUCATIONAL RESOURCES,
d/b/a Jefferson High School, LLC and Enterprise
High School, LLC, a Florida limited liability
company, ALEXANDER WOLFRAM, a/k/a Alex
Wolfram, an individual, and MARIA T. GARCIA,
a/k/a Maria Garcia, a/k/a Maria Calleja, a/k/a
Maria Trinidad Garcia Calleja, an individual.**

Defendants.

COMPLAINT

Plaintiff, OFFICE OF THE ATTORNEY GENERAL, DEPARTMENT OF LEGAL AFFAIRS, STATE OF FLORIDA (“PLAINTIFF” or the “ATTORNEY GENERAL”), hereby sues the Defendants, DIVERSIFIED EDUCATIONAL RESOURCES a Florida limited liability company, d/b/a Jefferson High School, LLC and Enterprise High School, LLC ALEXANDER WOLFRAM, an individual and MARIA T. GARCIA, a/k/a Maria Garcia, a/k/a Maria Calleja, a/k/a Maria Trinidad Garcia Calleja, an individual (hereinafter collectively referred to as “DEFENDANTS”), and alleges as follows:

JURISDICTION AND VENUE

1. This is an action for injunctive relief, equitable relief, attorneys’ fees, penalties and any other statutory relief available, pursuant to Florida's Deceptive and Unfair Trade Practices Act (hereinafter referred to as “FDUTPA”), Chapter 501, Part II, Florida Statutes.

2. This Court has subject-matter jurisdiction pursuant to the provisions of FDUTPA and § 26.012 Fla. Stat.

3. The statutory violations alleged herein occurred in or affected more than one judicial circuit in the State of Florida. Venue is proper in the Seventeenth Judicial Circuit as the statutory violations alleged herein occurred in Broward County, Florida. DEFENDANTS maintain an office in Broward County for the purpose of creating the impression that DEFENDANTS operate their business in Broward County, Florida and for communicating with consumers in Florida and throughout the United States.

4. DEFENDANTS, at all times material hereto, provided goods or services within the definition of Section 501.203(8), Florida Statutes.

5. DEFENDANTS, at all times material hereto, solicited consumers within the definition of Section 501.203(7), Florida Statutes.

6. DEFENDANTS, at all times material hereto, were engaged in a trade or commerce as defined by Section 501.203(8), Florida Statutes.

PLAINTIFF

7. PLAINTIFF is an enforcing authority of FDUTPA pursuant to Florida Statutes Section 501.203(2), and is authorized to pursue this action to enjoin violations of FDUTPA and to obtain legal, equitable or other appropriate relief including restitution, rescission or reformation of contracts, the refund of monies paid, disgorgement or ill-gotten monies, civil penalties, or other relief as may be appropriate by Fla. Stat. §501.207, 501.2075 and 501.2077.

8. PLAINTIFF has conducted an investigation, and the head of the enforcing authority, Attorney General Pam Bondi, has determined that an enforcement action serves the public interest, as required by Section 501.207(2), Fla. Stat. A copy of said determination is attached and incorporated herein as Plaintiff's **Exhibit A**.

DEFENDANTS

9. DEFENDANT DIVERSIFIED EDUCATIONAL RESOURCES, LLC (“DER”) is a for-profit limited liability company organized under the laws of Florida on or about August 24, 2012 with a principal place of business of 1451 West Cypress Creek Road, Fort Lauderdale, Florida 33309, which was maintained at all material times hereto. DEFENDANT DER also does or has done business as Jefferson High School, LLC and Enterprise High School, LLC, fictitious names DEFENDANT DER and/or its officer, DEFENDANT Maria Garcia, Maria Calleja, Maria Trinidad Garcia Calleja, registered with the State of Florida. At all times material to this complaint, DEFENDANT DER advertised, created, sold and offered to sell phony high school diplomas, high school transcripts, verification services to consumers throughout the United States.

10. ALEXANDER WOLFRAM (“WOLFRAM”), also known as Alex Wolfram, is an adult male over the age of eighteen and is *sui juris*. Upon information and belief, DEFENDANT WOLFRAM is not in the military service and resides in Arizona.

11. DEFENDANT WOLFRAM pays the costs associated with the operation of DEFENDANTS’ Florida virtual office. At all times material to this Complaint, DEFENDANT WOLFRAM has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint. DEFENDANT WOLFRAM, in connection with the matters alleged herein, transacts or has transacted business in Florida.

12. MARIA T. GARCIA (“GARCIA”), also known as Maria Garcia, Maria Calleja, Maria Trinidad Garcia Calleja, is an adult female over the age of eighteen and is *sui juris*. Upon information and belief, DEFENDANT GARCIA is not in the military service and is a Mexican national.

13. DEFENDANT GARCIA is the owner of one of two fictitious names Jefferson High School, LLC, registered with the State of Florida. DEFENDANT GARCIA is also an officer of

DEFENDANT DER, which is the owner of the second Jefferson High School, LLC pursuant to filings with the State of Florida. Furthermore, DEFENDANT GARCIA is the official contact person for DEFENDANTS' Florida virtual office and maintains the domain names and is the registrant and technical, billing, and administrative contact for DEFENDANTS' Internet websites. At all times material to this Complaint, she has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint. DEFENDANT GARCIA, in connection with the matters alleged herein, transacts or has transacted business in Florida.

DEFENDANTS' ACTS AND PRACTICES

14. DEFENDANTS operate a fraudulent online high school diploma mill, which creates, advertises and sells bogus online high school diplomas, transcripts and verification services issued from "Jefferson High School," and in the past "Enterprise High School," to consumers nationwide, including Florida through their websites¹. Currently, DEFENDANTS no longer offer academic credentials from "Enterprise High School" and direct consumers who visit the Enterprise High School, LLC website to the "Jefferson High School" website. On the Enterprise High School, LLC website, DEFENDANTS provide that "All future enrollments are for Jefferson High School only."

15. In addition to creating, advertising, and selling phony academic credentials, DEFENDANTS falsely represent on their website that "Jefferson High School" is a legitimate Florida private high school, students can obtain a diploma which can be used to pursue a variety of post-secondary education endeavors, the "Jefferson High School" program is an alternative to the GED® Test and GED/high school equivalency test preparation courses and that their program provides a money-back guarantee.

¹ The present form of DEFENDANTS' websites are online at: <http://www.jeffersonhighschool.us> and <https://www.ehsonlinehighschool.org>. Recent iterations include: <https://www.jeffersonhighschoolonline.com>, www.jeffersonhighschoolonline.net, www.enterprisehighschoolonline.org, and www.enterprisehighschoolonline.us.

16. DEFENDANTS claim that “Jefferson High School” is a Florida-based school. The only presence DEFENDANTS maintain in Florida, however, is a virtual office in Broward County, Florida which is used for the purpose of creating the impression that Jefferson High School is located in Florida. DEFENDANTS include a picture of the Broward County virtual office on their website along side their claim that the virtual office is DEFENDANTS’ “corporate headquarters.” Among other representations, DEFENDANTS list the virtual office address as their principal place of business in documents filed with Florida’s Department of State and Department of Education and are placed before the public on these Departments’ websites. DEFENDANTS also use the virtual office to accept and pass on mail to DEFENDANT WOLFRAM’s personal residence in Arizona, which is where DEFENDANTS operate Jefferson High School, LLC and forward phone messages to DEFENDANTS WOLFRAM and GARCIA out of state.

17. Furthermore, DEFENDANTS have attempted to have documents sent from their virtual office in Broward County, Florida on behalf of “Jefferson High School” to the State of Florida in an apparent effort to avoid detection that the mail is actually being sent from Arizona and that DEFENDANTS actually operate out of the State of Florida.

Defendants’ Diploma Mill Operation

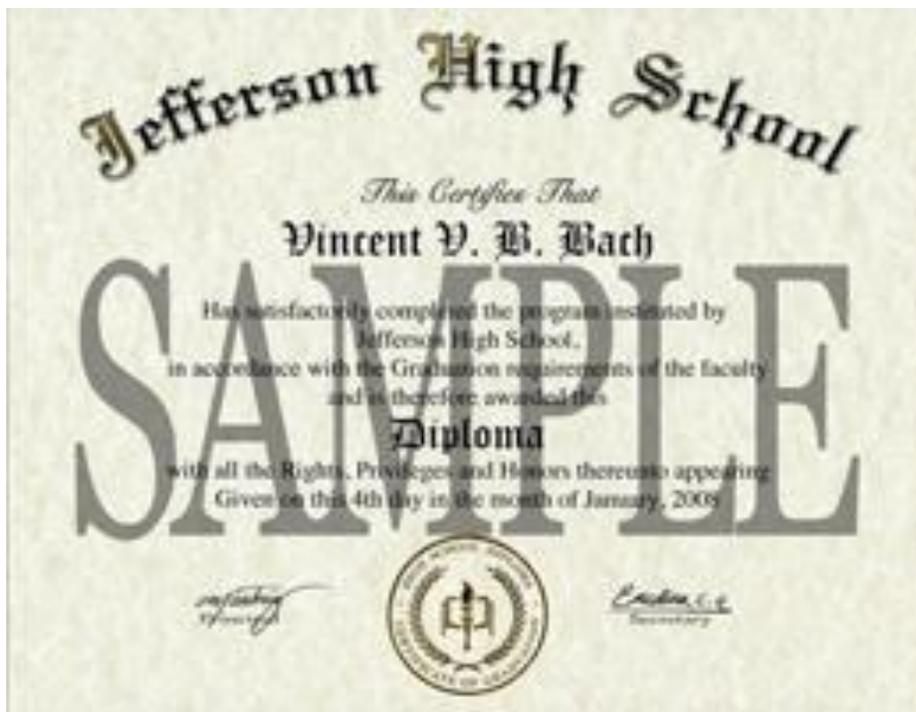
18. DEFENDANTS’ program provides no coursework, no instruction, and no textbooks or reference materials. Before consumers can purchase DEFENDANTS’ sham diplomas, transcripts and verification services, consumers are required to take a one minute experience survey, answer 100 questions posted on DEFENDANTS’ website and submit what is referred to nominally as an essay.

19. DEFENDANTS claim students must answer sixty-one (61) percent of the questions correctly to purchase “Jefferson High School” academic credentials. DEFENDANTS structure the 100 online questions so that customers are essentially guaranteed to answer at least sixty-one

percent (61%) of the questions correctly. Every question has only four (4) answer choices. DEFENDANTS give customers four opportunities to answer each question correctly, thus students can select every answer choice until they choose the correct response. In addition to crediting customers with correct answers by allowing them to submit every possible answer choice, if a customer submits an incorrect answer choice, DEFENDANTS provide customers hints to assist them choose the correct answer. Furthermore, customers have an unlimited amount of time to answer the questions posted on DEFENDANTS' website; customers can answer the question during the course of several days or weeks if they chose to do so. Finally, DEFENDANTS' have no mechanisms in place to ensure that the customer whose name appears on the sham academic credentials is actually the individual submitting answers to the online questions.

20. Once consumers finish answering the online questions, DEFENDANTS offer consumers an "Official Jefferson High School Diploma," an "Official Jefferson High School Transcript" and access to their "College/Employer Verification Service" for a fee which ranges from \$198 to \$277. The purported diploma and transcript are shipped to consumers within five (5) days of purchase.

21. On its face, the diploma DEFENDANTS advertise, create, sell and offer to sell mirrors the elements of a valid diploma.



More specifically, the document:

- a. represents it is a “Certificate of Graduation” from Jefferson High School;
- b. contains an emblem which contains the text “High School Diploma”;
- c. provides it is issued “in accordance with the Graduation requirements of the faculty”; and
- d. is signed by “Principal” DEFENDANT GARCIA.

22. Despite operating their program under the fictitious name Jefferson High School, LLC, the DEFENDANTS’ diplomas, as well as their transcripts and advertisements, omit the “LLC” from their d/b/a name and represent DEFENDANTS’ limited liability company as “Jefferson High School,” creating confusion with the unrelated Jefferson High School, a legitimate Florida public school located in Tampa, Florida that is part of the Hillsborough County Public School System.

23. DEFENDANTS also advertise, create, sell and offer to sell ostensibly valid high school transcripts. DEFENDANTS’ “Jefferson High School transcripts” contain representations

regarding their customers' academic achievement which include, but are not limited to the following assertions:

- a. Customers attempted a set number of units of academic equivalency subjects;
- b. Customers received a letter grade and obtained credits in as many as forty-five (45) academic equivalency subjects; and
- c. Customers earned units for and received a grade in academic equivalency subjects including, but not limited to Russian I, Russian II, Physical Education, Home Economics and Food Preparation.

24. In fact, DEFENDANTS' 100 online questions cover a mere four subjects, Science, Social Science, Language and Math, not the at least forty-five (45) academic equivalency subjects represented on the "Jefferson High School transcripts."

25. Furthermore, DEFENDANTS' transcripts do not accurately reflect customers' true performance answering the online questions. For example, a customer who attained a "C" grade by answering seventy (70) percent of the questions correctly received a transcript which represented the student received forty-four (44) "As" and one (1) "B+".

26. Finally, DEFENDANTS also provide customers a "College/Employer Verification Service" in which post-secondary education admission staff, military recruitment staff, employers and others can verify JHS customers' academic credentials by submitting a request for verification through DEFENDANTS' website. DEFENDANTS claim they respond to verification requests by calling the individual seeking to verify a "students" credentials.

27. In addition to providing these academic credentials, DEFENDANTS' conspicuously represent on their home page that DEFENDANTS offer a "Money Back Guarantee" for their services and claim "there is no risk" to using DEFENDANTS' program.

28. In fact, the “100% money-back guarantee” is only offered to customers who do not qualify for DEFENDANTS’ program. Only consumers who qualify, i.e. “pass” DEFENDANTS’ online questions, however, pay for DEFENDANTS phony academic credentials. Customers “who do not qualify” are never given the option to purchase DEFENDANTS’ sham academic credentials and never submit payment to the DEFENDANTS. Therefore, despite the representation of a 100% money-back guarantee, DEFENDANTS, in fact, have a no refund policy.

Jefferson High School, LLC’s Status

29. DEFENDANTS represent themselves to consumers as a Florida registered private school that has been in existence from 2006 through 2014 in their advertisements and marketing materials.

30. In addition to representing that “Jefferson High School” is located in Florida, DEFENDANTS also assert that “Jefferson High School” is a private high school.

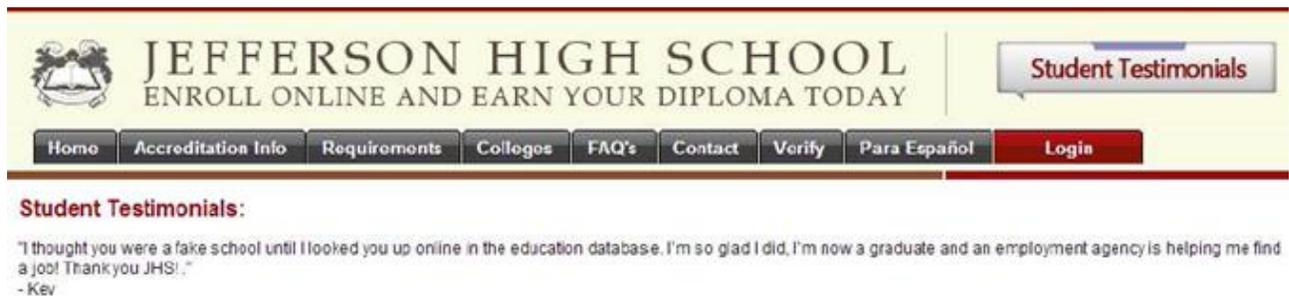
31. Florida statutes and administrative regulations, in part, require private schools to provide instructional services, which include but are not limited to, actual attendance during the school day, attendance in a home education program or enrollment in private tutoring programs that meet particular criteria. Private tutoring programs offering high school courses satisfy Florida’s statutory instructional requirements if, among other requirements, the person tutoring students holds a valid Florida certificate to teach the subjects or grades in which instruction is given and requires students to complete at least nine hundred (900) net instructional hours.

32. The JHS program does not qualify as a Florida private school as DEFENDANTS do not provide any instruction, fail to employ a private tutor with a valid Florida certificate and do not require customers to complete at least nine hundred (900) net instructional hours.

33. Despite DEFENDANTS failure to meet the requirements necessary to be classified as a Florida private school, DEFENDANTS submitted information pertaining to “Jefferson High

School” to the Florida Department of Education’s annual private school survey, a self-reported listing of all Florida private schools. The survey is strictly for legitimate private schools only.

34. DEFENDANTS also represent that the code number they received as a result of submitting JHS’ data to the Florida Department of Education’s survey implies approval by or affiliation with this Department. DEFENDANTS claim “Jefferson High School is Registered with the FL State Department of Education as a private diploma granting high school, as required by State Law.” Furthermore, DEFENDANTS prominently display the code number on their homepage and tout their “registration” with the State of Florida and Broward County. DEFENDANTS’ also provide the following a purported customer testimonial on their website:



35. In fact, the code number issued to DEFENDANTS by the Florida Department of Education “does not imply approval or accreditation by the Department of Education.”

36. Finally, DEFENDANTS claim “Jefferson High School” has been in existence 2006-2014. In fact, DEFENDANTS registered both DER and the fictitious name Jefferson High School, LLC in the State of Florida in 2012.

Benefits Associated with Obtaining a “Jefferson High School Diploma”

37. DEFENDANTS’ make the following representations regarding their diploma program in their advertisements and marketing materials:

- a. Students receive an “official diploma”;
- b. Completion of the program makes customers a high school graduate;
- c. Customers will “advance position in life and gain proof of your accomplishments”;
- d. Customers can “consider” at least 200 postsecondary institutions from across the country, as well as several branches of the military for their post-graduate plans.

38. The purported high school diploma offered by DEFENDANTS is not the equivalent of a high school diploma from an accredited school and does not assist consumers in gaining admission to post-secondary educational institutions or enlisting in the military. DEFENDANTS’ conspicuously make these claims directly and indirectly on their websites and online advertisements and then bury disclaimers to the contrary in their terms and conditions, a lengthy document in small print which is only accessible to consumers through a link at the foot of DEFENDANTS’ websites.

39. In reality, many of the institutions and organizations DEFENDANTS’ list on their website have express policies which preclude the use of the JHS “diploma” for acceptance to or enlistment with these entities.

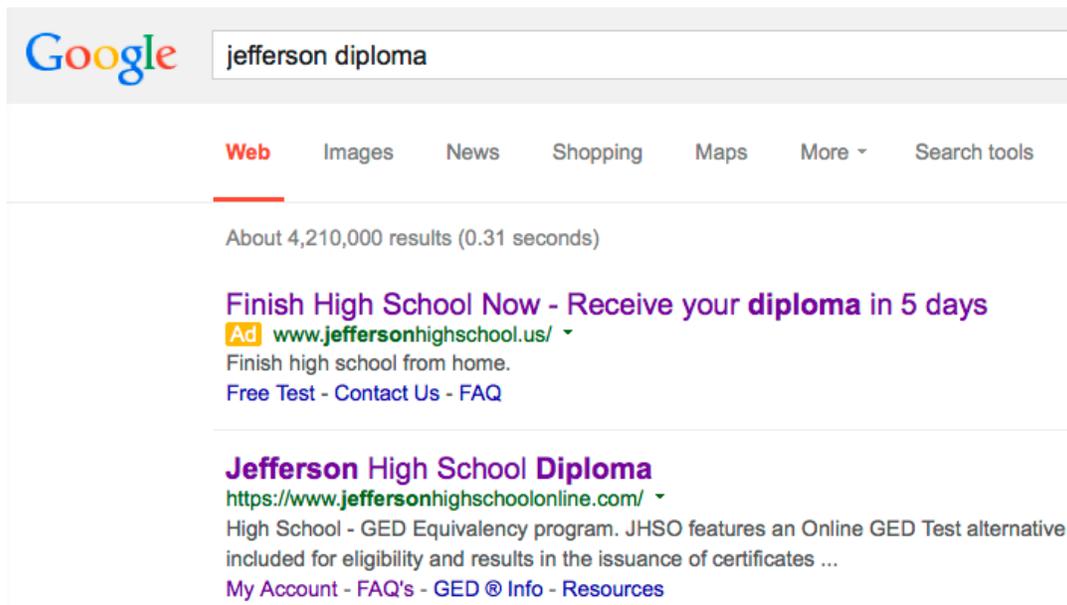
40. For example, Florida universities and colleges’ admission policies are required to include express minimum eligibility criteria. DEFENDANTS’ JHS diploma does not meet these minimum criteria and may not be used for acceptance in a Florida college or university. Therefore the Florida public universities and colleges listed on the JHS website are not post-secondary options for consumers with only a JHS diploma.

41. Similarly, the United States military generally requires a high school diploma from an accredited institution or proof of completion of a comparable course of study. For example, see the Air Force Recruiting Manual at §2.12, Army Education Enlistment Credentials (USAREC Regulation 601-101). The JHS “diploma” and “transcript” do not satisfy either of these criteria.

42. Finally, some post-secondary educational institutions and/or branches of the military have included JHS on their “black list,” a record which identifies organizations that issue invalid academic credentials. Consequently, included on DEFENDANTS’ list of post-secondary opportunities for consumers who purchase a JHS diploma are institutions which expressly preclude the use of the JHS for such purposes.

JHS program as an alternative to GED® Test or higher equivalency test preparation courses.

43. DEFENDANTS conspicuously advertise and represent that their JHS diploma and online questions are an alternative to the General Educational Development® (GED) equivalency test or a GED®/high school equivalency preparation course for the GED® test.



44. DEFENDANTS further advertise and allege that their program is an alternative to a high school equivalency diploma or preparation course through representations which include, but

are not limited to, claims that “[s]tudents may also utilize our diploma program as a preparation for the GED® test or continue with us for a diploma instead”; “[h]ighly recommended as an online preparation tool for GED® Test”; and “Program is designed to prepare for GED® Test.”

45. Completion of DEFENDANTS’ online questions does not qualify its customers for a equivalency diploma from the State of Florida. Therefore, DEFENDANTS’ program is not an alternative to the GED® Test.

46. Florida statutes expressly define General Educational Development® (GED)/high school equivalency test preparation as courses of instruction designed to prepare adults for success on GED subject area tests leading to qualification for a State of Florida high school diploma. Again, DEFENDANTS acknowledge on their website that “[n]o classroom work or instructional classes of any kind are necessary for our program to be completed...” Consequently, DEFENDANTS online questionnaire is not a GED®/high school equivalency test preparation course because DEFENDANTS fail to provide customers any instruction.

COUNT I

47. The ATTORNEY GENERAL adopts, incorporates herein and re-alleges paragraphs 1 through 46 as if fully set forth hereinafter.

48. Section 501.203(3)(c), Fla. Stat., establishes that a violation of any law, statute, rule, regulation, or ordinance which proscribes unfair methods of competition, or unfair, deceptive, or unconscionable acts or practices is a violation of the provisions of FDUTPA.

49. Chapter 817, Part I prohibits acts and practices committed through fraud or false pretenses. Therefore, any violation of Section 849.0935, Fla. Stat., constitutes a per se violation of FDUTPA, and is subject to the penalties and remedies provided for such violation.

50. Section 817.06, Fla. Stat., prohibits knowingly or intentionally making, publishing, disseminating, circulating or placing advertisements that contain untrue, deceptive, or misleading

assertions, representations or statements by any person, association or institution, with intent to offer or sell or otherwise dispose of certificates, diplomas, documents, or other credentials purporting to reflect proficiency in any trade, skill, profession, credits for academic achievement.

51. DEFENDANTS intend to offer or sell diplomas, transcripts and verification services and make, publish, disseminate, circulate or place advertisements that contain untrue, deceptive, or misleading assertions, representations or statements as set forth in paragraphs 1 through 46..

52. Therefore, DEFENDANTS' representations in violation of Section 817.06, Fla. Stat. constitute per se violations of FDUTPA and are subject to the penalties and remedies provided for such violations.

COUNT II

53. The ATTORNEY GENERAL adopts, incorporates herein and re-alleges paragraphs 1 through 46 as if fully set forth hereinafter.

54. FDUTPA provides that "unfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful."

55. As described in Paragraphs 18 through 27, DEFENDANTS directly or indirectly, expressly or by implication create documents and/or provide services that falsely represent customers' academic credentials. The JHS "diplomas" and "transcripts" created and sold by DEFENDANTS and confirmed through their verification services falsely represent their student's grades and other measures of academic achievement in high school equivalency subjects.

56. DEFENDANTS false or misleading representations constitute deceptive acts or practices in violation of FDUTPA.

COUNT III

57. The ATTORNEY GENERAL adopts, incorporates herein and re-alleges paragraphs 1 through 46 as if fully set forth hereinafter.

58. FDUTPA provides that “unfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful.”

59. DEFENDANTS directly or indirectly, expressly or by implication have made false, deceptive and unfair representations including, but not limited to, the following:

- a. assertions that JHS is a registered Florida private school; and/or
- b. claims regarding the benefits associated with a JHS diploma; and/or
- c. statements that the JHS program is an alternative to the GED® Test and/or a high school equivalency examination preparation services; and/or
- d. promises that program is risk-free because of DEFENDANTS’ money-back guarantee.

60. DEFENDANTS false or misleading representations constitute deceptive acts or practices in violation of FDUTPA.

COUNT IV

61. The ATTORNEY GENERAL adopts, incorporates herein and re-alleges paragraphs 1 through 46 as if fully set forth hereinafter.

62. Section 501.203(3)(c), Fla. Stat., establishes that a violation of any law, statute, rule, regulation, or ordinance which proscribes unfair methods of competition, or unfair, deceptive, or unconscionable acts or practices is a violation of the provisions of FDUTPA.

63. Section 501.97(2), Fla. Stat., sets forth that a violation of Section 501.97 is a deceptive and unfair trade practice and constitutes a violation of FDUTPA.

64. Section 501.97, Fla. Stat., prohibits the misrepresentation of the geographic location of the supplier of a service or product by listing a fictitious business name or an assumed business name in print advertisement if: (a) the name and overall context of the advertisement misrepresent that the supplier maintains an established place of business within the state when in fact the supplier has no such business in the state and (b) calls to the local telephone number are routinely forwarded or otherwise transferred to a business location that is outside the State of Florida.

65. DEFENDANTS's print advertisements represent that their fictitious business, Jefferson High School, LLC, maintains an established place of business within Florida.

66. In fact, DEFENDANTS' business is actually operated from DEFENDANT WOLFRAM's personal residence in Arizona. DEFENDANTS merely maintain a virtual office in Florida.

67. The Jefferson High School, LLC phone number DEFENDANTS advertise is really the phone number to their Florida virtual office. Consumers and others attempting to call "Jefferson High School" at their Florida "corporate headquarters" are directed to leave a phone message, which is then forwarded out of state to DEFENDANTS GARCIA AND WOLFRAM.

68. DEFENDANTS' actions in violation of Section 501.97, Fla. Stat. constitute per se violations of FDUTPA and are subject to the penalties and remedies provided for such violations.

CONSUMER INJURY

69. DEFENDANTS above-described acts and practices have injured and will likely continue to injure and prejudice the public and consumers in the State of Florida. In addition, DEFENDANTS have been unjustly enriched as a result of their deceptive acts or practices. Unless DEFENDANTS are enjoined from engaging further in the acts and practices complained of herein, the continued activities of DEFENDANTS will result in irreparable injury to the public and consumers in the State of Florida for which there is no adequate remedy at law.

PRAYER FOR RELIEF

70. **WHEREFORE**, Plaintiff, State of Florida, Office of the Attorney General, Department of Legal Affairs, respectfully requests that this Court:

A) GRANT preliminary injunctive relief against DEFENDANTS, their officers, agents, servants, employees, attorneys and those persons in active concert or participation with the DEFENDANTS who receive actual notice of this injunction to prevent future FDUTPA violations until a final judgment in this action is entered;

B) GRANT permanent injunctive relief against DEFENDANTS, their officers, agents, servants, employees, attorneys and those persons in active concert or participation with the DEFENDANTS who receive actual notice of this injunction to prevent future FDUTPA violations;

C) AWARD full restitution to all consumers who are shown to have been injured as a result of DEFENDANTS' FDUTPA violations, pursuant to Section 501.207, Florida Statutes as well as other relief, including but not limited to, rescission or reformation of contracts, and the disgorgement of ill-gotten monies;

D) ASSESS civil penalties as prescribed by Section 501.2075, Fla. Stat. and enhanced civil penalties for each senior citizen, person with a disability, military service member or the spouse or dependent child of a military service member as prescribed by Section 501.2077, Fla. Stat., for each act or practice found to be in violation of Chapter 501, Part II, of the Florida Statutes.

E) AWARD attorneys' fees and costs pursuant to Section 501.2075, Fla. Stat., or as otherwise authorized by law.

F) AWARD such equitable or other relief as is just and appropriate pursuant to Section 501.207, Florida Statutes.

G) GRANT such other relief as this Honorable Court deems just and proper.

Dated this __ day of _____, 2014

Respectfully Submitted,

PAMELA JO BONDI
Attorney General of the State of Florida

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