

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**KATHLEEN M. JASPER  
AND  
JEREMY M. JASPER**

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**SEALED  
INDICTMENT**

4:20 cr 76-AW

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**Racketeering Conspiracy  
18 U.S.C. § 1962(d)**

**A. INTRODUCTION**

At all times material to this Indictment:

Florida State Board of Education, Florida Department of  
Education, and Teaching in Florida

1. The Florida State Board of Education (hereinafter “SBOE”), headquartered in Tallahassee, Florida, was mandated by law, namely, Florida Statutes Section (hereinafter “F.S.S.”) 20.15 to supervise the system of free education in Florida. SBOE was the chief implementing and coordinating body of public education in Florida, except for the State University System, pursuant to F.S.S. 1001.02(1). The Florida Department of Education (hereinafter “FLDOE”), headquartered in Tallahassee, Florida, acted pursuant to F.S.S. 1001.20(1) and (2)

as an administrative and supervisory agency under the direction of the SBOE, and assisted in providing professional leadership and guidance and in carrying out the policies, procedures, and duties authorized by law or by the SBOE.

2. The Florida Legislature designated the practice of teaching in Florida public schools and its related services, including administering and supervisory services, as professional services, as stated in F.S.S. 1012.51.

3. The Florida Legislature intended that school personnel certified in Florida possessed the credentials, knowledge, and skills necessary to allow the opportunity for a high-quality education in Florida public schools, as stated in F.S.S. 1012.54. The purpose of school personnel certification, as stated in F.S.S. 1012.54 and Rule 6A-4.001 of the Florida Administrative Code (hereinafter “F.A.C.”) was to protect the educational interests of students, parents, and the public at large by assuring that Florida educators were professionally qualified.

4. SBOE was required among other things, pursuant to F.S.S. 1001.03(3) and 1012.55(1)(a), to designate certification subject areas, establish competencies and certification requirements for all school-based personnel, and prescribe rules with which the professional and temporary certificates shall be issued by the FLDOE to applicants who meet established standards.

5. Each person employed or occupying a position as a school principal, teacher, or other instructional position in any public school in Florida was required,

pursuant to F.S.S. 1012.55(1)(b), to hold the certificate required by Chapter 1012 of the Florida Statutes and by F.A.C. Chapter 6A-4.

6. FLDOE offered two types of certificates: professional and temporary, as described in F.S.S. 1012.56(7) and in F.A.C. Rule 6A-4.002.

#### FLDOE Teacher Certification

7. FLDOE offered teacher certifications in over 30 subjects, including Elementary Education (grades K-6), English (grades 6-12), and Social Studies (grades 6-12). Florida educators were required to take and pass one or more particular Subject Area Exams (SAEs) to become certified in a particular subject.

8. Florida teaching certifications were valid for five (5) years after issuance. Sitting for and passing FLDOE subject area examinations were one of several methods by which current Florida teachers could renew their teaching certifications.

#### The FTCE and FELE

9. Pursuant to F.A.C. Rule 6A-4.001, FLDOE's Bureau of Educator Certification (hereinafter "BEC") was responsible for implementing the teacher certification provisions of the Florida Statutes and the SBOE administrative rules. FLDOE's BEC offered two written examinations, passage of which were required for educator certification in Florida: the Florida Teacher Certification

Examinations (hereinafter “FTCE”) and the Florida Educational Leadership Examination (hereinafter “FELE”).

10. The FTCE and FELE provided an assessment tool that allowed prospective Florida educators to demonstrate their knowledge and skills in the areas of general knowledge, professional education competence, educational leadership, and/or subject area knowledge. The FTCE and FELE measured prospective teachers’ and school administrators’ achievement of the benchmarks established by the SBOE, as stated in F.A.C. Rules 6A-4.0021 and 6A-4.00821.

11. The FTCE was comprised of three parts: (1) General Knowledge Tests (hereinafter “GK”), (2) the Professional Education Test, and (3) a SAE.

- a. The GK consisted of four (4) subtests: English Language Skills, Reading, Mathematics, and Essay Writing.
- b. The Professional Education Test assessed examinees’ knowledge of topics including instructional design and planning, appropriate student-centered learning environments, instructional delivery, student assessment strategies, and the Code of Ethics and Principles of Professional Conduct.
- c. FLDOE offered over 30 individual SAEs, including Business Education, Elementary Education, Prekindergarten/Primary Education (PK-3), Social Science (grades 6-12), and

Exceptional Student Education. Some SAEs were comprised of subtests. For example, the Elementary Education SAE consisted of four subtests: Language Arts and Reading (often referred to as “K6 ELA”), Social Science, Science, Mathematics.

12. Additionally, Florida teachers who also desired to become school administrators were required to take and pass the FELE. The FELE was comprised of three subtests: (1) Leadership for Student Learning, (2), Organizational Development, and (3) Systems Leadership.

13. The FTCE and FELE contained multiple-choice questions, performance (essay) questions, and both multiple-choice and performance (essay) questions.

14. There was more than one version of some subtests of the FTCE and FELE in order to maintain the integrity of the FTCE and FELE and to ensure that an examinee would not see the same test content if he or she had to retake the FTCE and FELE.

#### FTCE and FELE Development and Ownership

15. FLDOE conducted and oversaw all FTCE and FELE test development activities, including the writing of FTCE and FELE test questions and answers (hereinafter “test content”), using statewide committees of subject matter experts

from Florida colleges, universities, school districts, and K–12 classrooms. Doing so ensured that the FTCE and FELE were appropriately rigorous and fully aligned to the SBOE-approved standards.

16. SBOE and FLDOE were the owners of FTCE and FELE test content.

17. To keep its FTCE and FELE test content exclusive, secure, and confidential, FLDOE restricted access to and use of FTCE and FELE test content. Doing so ensured that the FTCE and FELE were valid assessment tools to ensure that Florida educators were professionally qualified.

18. SBOE and FLDOE developed a positive reputation for ensuring that only professionally qualified teachers were licensed to teach in Florida public schools, in part due to the integrity of the FTCE and FELE test content and the testing process. FLDOE was also authorized by F.S.S. 1012.56(9) to contract for the development, administration, and scoring of certification exams, including the FTCE and FELE.

19. Pearson VUE (hereinafter “Pearson”), headquartered in the state of Minnesota, was contracted by FLDOE to administer and score the FTCE and FELE since in or about October 2007. FLDOE provided limited access to FTCE and FELE test content to Pearson for administration to prospective examinees around the United States and abroad. Pearson was bound by a confidentiality agreement to keep FTCE and FELE test content a secret, except for limited

disclosure to examinees who registered to take the exams, and in doing so, agreed to enter into confidentiality agreements concerning the FTCE and FELE test content, as described below.

20. FLDOE owned and controlled the FTCE and FELE testing program, as governed by F.A.C. Rules 6A-4.0021 and 6A-4.00821. FLDOE routinely received FTCE and FELE registration and test score data electronically from Pearson, on a weekly, monthly, and quarterly basis. FLDOE used such data to monitor testing activity and perform quality control analyses. Pearson ran an automated and routine check of a database that was used by FLDOE to screen FTCE and FELE prospective examinees who were deemed by FLDOE to be unauthorized to sit the FTCE and FELE, as outlined in 6A-4.0021, F.A.C. and 6A-4.00821, F.A.C. These automated screening processes were authorized and monitored by FLDOE. Pearson periodically reported to FLDOE information about attempted FTCE and FELE registrations made by such unauthorized persons.

21. The FTCE and FELE were administered by computer at test centers located across the United States and at U.S. military bases overseas. Anyone could take the FTCE or FELE; there was no credentialing or pre-qualification process to register for and sit for these exams. Prior to on or about June 19, 2018, the FTCE and FELE could be taken every thirty calendar days regardless of exam outcome. Beginning on or about June 19, 2018, pursuant to F.A.C. Rule 6A-4.0021, an

examinee was not permitted to retake the FTCE and FELE once a passing score was achieved unless:

- a. at least three (3) years had elapsed since the previous administration of the passed FTCE and FELE;
- b. the SBOE had adopted new competencies and skills for the field; or
- c. the examinee has applied for reinstatement of an expired professional certification, pursuant to 6A-4.0051 (7), FAC.

Registering and Paying for the FTCE and FELE

22. Prospective examinees registered and paid for the FTCE and FELE, and scheduled their test appointments, online through Pearson's website. Each business day, Pearson wired the registration fees from the previous business day to FLDOE, and also sent FLDOE a daily transaction summary of the total registration fees transferred on the previous business day. Therefore, the registration and payment process involved wire communications between the computers at which the prospective examinees registered, computers at Pearson (which were located in the states of Minnesota, Massachusetts, and Iowa), and FLDOE computers (located in Tallahassee, Florida).

23. At the time of registration, prospective examinees were required to read and acknowledge various testing rules and regulations (that governed testing



behaviors including, but not limited to, cheating) before they were able to select an FTCE and FELE, a test administration date and time, and a testing location.

Specifically, prospective examinees were presented with a screen titled “Important Information about Cheating Behaviors and Test Score Invalidations” that contained several subsections, including one titled “Agreement to the Testing Rules”

(hereinafter “Testing Rules”). The Testing Rules section stated, in part:

I understand that all of the examination materials are the sole property of the Florida Department of Education and that I am not permitted to take any of the examination materials from the examination site or to reproduce the materials in whole or part by any method. I understand that I am not permitted to provide others with any part of questions, answers, responses, or prompts from the examination at any time, whether before, during, or after the test, whether obtained or distributed by physical means or by memory.

Under the Testing Rules section was a checkbox that when clicked, indicated that, among other things, the prospective examinee read and agreed to abide by all of the testing rules and conditions. Prospective examinees who declined to click on the checkbox to indicate that they agreed to all test rules and regulations, including those set forth in the Testing Rules section, were not permitted to register for the FTCE and FELE, meaning that the prospective examinee would not be given access to any FTCE and FELE test content.

24. Prospective examinees were required to pay for the FTCE and FELE using a credit card or debit card, and were required to input the card information on

the Pearson website during the registration process. Once the payment method was verified, the prospective examinee's funds were transferred to Pearson's bank account. On the first business day following FTCE and FELE registration and payment verification, FLDOE received the registration funds in its bank account.

25. After successfully registering to sit for the FTCE and FELE, prospective examinees received an email that contained a reminder of the applicable testing rules and conditions to which the prospective examinee already agreed, and links to documents setting forth such rules and conditions. The email sent to prospective examinees also noted that a nondisclosure agreement will be presented at the time of the FTCE and FELE administration.

26. Once a prospective examinee arrived at the test center to take the FTCE and FELE, he or she was presented with the Form C-1 Candidate Rules Agreement (hereinafter "Candidate Rules Agreement") that advised the prospective examinee that:

You may not remove copies of test questions, or test answers from the testing center, and you may not share or discuss with anyone all or any of the test questions or test answers you saw or viewed during the taking of the test. If you do not abide by these rules, if you tamper with the computer or if you are suspected of cheating, appropriate action will be taken, including the possibility of the test sponsor taking action against you.

Prospective examinees were required to agree to and sign the Candidate Rules Agreement; those who declined to agree to all test rules and regulations were not permitted to sit for the FTCE and FELE, meaning that the prospective examinee would not be given access to any FTCE and FELE test content.

27. Additionally, prospective examinees were presented with a Nondisclosure Agreement (“NDA”) screen at the workstation computers where the FTCE and FELE was to be administered prior to the actual administration of the exam. The NDA stated that, in part, that:

I acknowledge that I have had adequate opportunity to review, to my satisfaction, the instructions, rules, policies, and other terms and conditions that apply to my test registration and administration for the FTCE/FELE, and I agree to abide by the conditions set forth in the current FTCE/FELE registration testing information, including ‘Important Information and Agreements to the Testing Rules,’ ‘Important Information about Cheating Behaviors and Test Score Validations,’ and by the rules communicated to me orally or in writing at the test administration.

The NDA screen further read, “If you elect to DECLINE the Nondisclosure Agreement, you will EXIT the exam.” At the bottom of the NDA screen were two buttons that a prospective examinee could select: “Decline” and “Accept.” If the prospective examinee selected the “Decline” button, then the prospective examinee would not be permitted to sit for the FTCE and FELE, which meant that the prospective examinee would not be given access to any FTCE and FELE test content. If the prospective examinee selected the “Accept” button, then the FTCE

and FELE would begin and the prospective examinee was given access to the FTCE and FELE test content.

#### Post-Administration Quality Control Checking

28. Within 30 days of a particular administration of the FTCE and FELE, Pearson notified FLDOE by email that preliminary FTCE and FELE score information is available for FLDOE to download and review.

29. FLDOE staff downloaded the preliminary FTCE and FELE score information from a server located in the states of Minnesota, Massachusetts, and Iowa onto FLDOE servers located in Tallahassee, Florida.

30. FLDOE staff reviewed and validated the preliminary FTCE and FELE score information provided by Pearson. Once the preliminary FTCE and FELE scores were validated, FLDOE authorized official score reports to be generated and sent to the FTCE and FELE examinees, Florida school districts, colleges and universities, and FLDOE's BEC.

### **B. THE ENTERPRISE**

#### Participants in the Enterprise

31. NavaEd, LLC ("NavaEd"), formerly known as Edge Academic Solutions, LLC, was a for-profit Florida limited liability company established on or about January 1, 2016, and was headquartered in Estero, Florida. NavaEd offered tutoring and training to prepare prospective Florida educators to successfully take

and pass the FTCE and FELE. NavaEd, through its officers, employees, and independent contractors, authored FTCE and FELE training publications (“study guides”) that were offered for sale through direct sales via NavaEd’s website and through third-party e-commerce websites. NavaEd’s Chief Executive Officer was Defendant **KATHLEEN M. JASPER**.

32. NavaED had no formal or informal relationship with FLDOE, nor was NavaEd authorized by FLDOE to possess, use, or republish FTCE and FELE test content.

33. NavaEd constituted an enterprise as defined in Title 18, United States Code, Section 1961(4), that is, a corporation and a legal entity, hereafter referred to as the “Enterprise.” The Enterprise was engaged in, and its activities affected, interstate and foreign commerce.

34. Defendant **KATHLEEN M. JASPER** and Defendant **JEREMY M. JASPER** controlled and operated the Enterprise. Defendant **KATHLEEN M. JASPER** directed other members and associates of the Enterprise in carrying out the unlawful activities and other activities in furtherance of the Enterprise's affairs.

35. Defendant **KATHLEEN M. JASPER** was a licensed Florida teacher since July 1, 2007. Kathleen M. Jasper held certifications from FLDOE in subject areas to include Exceptional Student Education, Educational Leadership, English,

and Biology. Kathleen M. Jasper authored several NavaEd publications designed to prepare examinees for the FTCE and FELE, and proofread and edited all other NavaEd publications authored by NavaEd employees and independent contractors.

36. Defendant **JEREMY M. JASPER** was a licensed Florida teacher since July 1, 2010. Jeremy M. Jasper held certifications in subject areas including Educational Leadership, Biology, Elementary Education, Mathematics, and Exceptional Student Education. Jeremy M. Jasper was an employee of NavaEd and his duties included administrative functions and tutoring NavaEd customers in mathematics. Jeremy M. Jasper also authored NavaEd publications designed to prepare examinees for the FTCE and FELE.

37. NavaEd also employed several employees and independent contractors, including individuals referred to herein as “V.W.,” “J.R.V.,” “A.W.,” “J.E.,” “W.K.,” “K.L.,” “P.M.,” “S.R.,” “C.S.,” and “J.V.”

#### Purposes of the Enterprise

38. The purposes of the Enterprise included the following:

- a. conducting training seminars, in-person throughout Florida and over the Internet, for the FTCE and FELE,
- b. providing one-on-one tutoring session, in-person and over the Internet, for the FTCE and FELE,
- c. authoring and offering for sale study guides designed to prepare

examinees for the FTCE and FELE,

- d. expanding and preserving NavaEd's market share and customer base,
- e. engaging in wire fraud to obtain access to proprietary FTCE and FELE test content,
- f. engaging in transactions to spend the proceeds of wire fraud, and
- g. increasing NavaEd's revenue and, in turn, enriching the defendants and associates of the Enterprise.

### **C. THE RACKETEERING CONSPIRACY**

39. Between on or about March 24, 2016, and on or about March 10, 2020, in the Northern District of Florida and elsewhere, the defendants,

**KATHLEEN M. JASPER and  
JEREMY M. JASPER,**

and others known and unknown to the Grand Jury, being persons employed by and associated with the Enterprise, which was engaged in, and the activities of which affected, interstate and foreign commerce, willfully and knowingly combined, conspired, confederated, and agreed together and with each other, to violate the racketeering laws of the United States, to wit, Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct

of the affairs of the Enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts indictable under Title 18, United States Code, Section 1343 (Wire Fraud).

40. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the Enterprise's affairs.

#### **D. MANNER AND MEANS**

41. The defendants and their associates agreed to conduct the affairs of the Enterprise through the following manner and means, among others:

42. Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** electronically registered to take the FTCE and FELE through Pearson's website. In some instances, **KATHLEEN M. JASPER** and **JEREMY M. JASPER** registered for and took a particular FTCE and FELE test multiple times, which sometimes resulted in **KATHLEEN M. JASPER** and **JEREMY M. JASPER** gaining access to different form versions of a particular FTCE and FELE test.

43. Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** falsely and fraudulently acknowledged and agreed to various testing rules and regulations, including those set forth in the Testing Rules, at the time of registering for the FTCE and FELE.



44. Upon arriving at the test center, Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** were presented with, and falsely and fraudulently accepted, the Candidate Rules Agreement.

45. Prior to the actual administration of the FTCE and FELE, Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** were presented with an NDA screen at the workstation computer where the FTCE and FELE was to be administered. **KATHLEEN M. JASPER** and **JEREMY M. JASPER** falsely and fraudulently accepted the terms of the NDA by clicking the button on the computer screen labeled “Accept.”

46. In doing so, Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** falsely and fraudulently gained access to FTCE and FELE test content.

47. During the FTCE and FELE, Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** memorized test content – a process hereinafter referred to as “harvesting.” Upon exiting the testing center, **KATHLEEN M. JASPER** and **JEREMY M. JASPER** reduced such memorized test content to writing and by electronic means – a process hereinafter referred to as “brain dumping.”

48. Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** shared FTCE and FELE test content with NavaEd customers through email, phone, video conferencing, and messaging applications (hereinafter “apps”).

49. After FLDOE blocked and prevented Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** from further registering for and taking the FTCE and FELE due to concerns about testing anomalies and fraudulent activity, **KATHLEEN M. JASPER** instructed NavaEd employees and independent contractors to register for, and take the FTCE and FELE in a manner that would violate the Testing Rules, the Candidate Rules Agreement, and the NDA.

Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** directly paid for the FTCE and FELE registration costs and fees for some NavaEd employees and independent contractors. Some NavaEd employees and independent contractors were reimbursed for their FTCE and FELE registration costs and fees.

50. Further, **KATHLEEN M. JASPER** instructed NavaEd employees and independent contractors to engage in harvesting of FTCE and FELE test content and to engage in brain dumping after leaving the testing center.

51. During in-person and online training and tutoring sessions, Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER**, and NavaEd employees and independent contractors discussed FTCE and FELE test content with NavaEd customers who already took the FTCE and FELE. **KATHLEEN M.**

**JASPER, JEREMY M. JASPER**, and NavaEd employees and independent contractors memorialized these discussions with such NavaEd customers in writing and by electronic means.

52. The FTCE and FELE test content that **KATHLEEN M. JASPER, JEREMY M. JASPER**, and NavaEd employees and independent contractors obtained from harvesting, brain dumping, and from discussions with NavaEd students was republished – verbatim and almost verbatim – into NavaEd publications that were written to prepare examinees for the FTCE and FELE. These publications were offered for sale on the NavaEd website and through online merchants such as Amazon and Shopify to NavaEd customers and prospective FTCE and FELE examinees worldwide. These publications and other NavaEd FTCE and FELE preparation materials were also disseminated and used during NavaEd training seminars and tutoring sessions.

53. NavaEd received proceeds from the sale of its FTCE and FELE preparation publications, training seminars, and tutoring sessions by check and through electronic commerce (also known as “e-commerce”) and online payment companies, including PayPal, Square, and Intuit.

All in violation of Title 18, United States Code, Section 1962(d).

**COUNT TWO**

**Conspiracy to Commit Wire Fraud  
18 U.S.C. § 1349**

**A. INTRODUCTION**

1. The allegations of Section A and B of Count One are hereby realleged and incorporated by reference as if fully set forth herein.

**B. THE CHARGE**

2. Between on or about March 24, 2016, and on or about March 10, 2020, in the Northern District of Florida and elsewhere, the defendants,

**KATHLEEN M. JASPER and  
JEREMY M. JASPER,**

did knowingly and willfully combine, conspire, confederate, and agree together and with other persons to devise, and intend to devise, a scheme to defraud and for obtaining money and property, namely, proprietary FTCE and FELE test content owned by FLDOE and SBOE, by means of material false and fraudulent pretenses, representations, and promises, and to cause wire communications to be transmitted in interstate commerce for the purpose of executing such scheme, in violation of Title 18, United States Code, Section 1343.

### C. MANNER AND MEANS

3. The manner and means by which this conspiracy was committed included the following:

4. Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** electronically registered to take the FTCE and FELE through Pearson's website. In some instances, **KATHLEEN M. JASPER** and **JEREMY M. JASPER** registered for and took a particular FTCE and FELE test multiple times, which sometimes resulted in **KATHLEEN M. JASPER** and **JEREMY M. JASPER** gaining access to different form versions of a particular FTCE and FELE test.

5. Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** falsely and fraudulently acknowledged and agreed to various testing rules and regulations, including those set forth in the Testing Rules, at the time of registering for the FTCE and FELE.

6. Upon arriving at the test center, Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** were presented with, and falsely and fraudulently accepted, the Candidate Rules Agreement.

7. Prior to the actual administration of the FTCE and FELE, Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** were presented with an NDA screen at the workstation computer where the FTCE and FELE was to be administered. **KATHLEEN M. JASPER** and **JEREMY M. JASPER** falsely and

fraudulently accepted the terms of the NDA by clicking the button on the computer screen labeled “Accept.”

8. In doing so, Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** falsely and fraudulently gained access to FTCE and FELE test content.

9. During the FTCE and FELE, Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** engaged in harvesting with respect to test content. Upon exiting the testing center, **KATHLEEN M. JASPER** and **JEREMY M. JASPER** engaged in brain dumping with respect to test content that they memorized.

10. Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** shared FTCE and FELE test content with NavaEd customers through email, phone, video conferencing, and messaging applications (hereinafter “apps”).

11. After FLDOE blocked and prevented Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** from further registering for and taking the FTCE and FELE due to concerns about testing anomalies and fraudulent activity, **KATHLEEN M. JASPER** instructed NavaEd employees and independent contractors to register for and take the FTCE and FELE. Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER** directly paid for the FTCE and FELE registration costs and fees for some NavaEd employees and

independent contractors. Some NavaEd employees and independent contractors were reimbursed for their FTCE and FELE registration costs and fees.

12. Further, **KATHLEEN M. JASPER** instructed NavaEd employees and independent contractors to engage in harvesting of FTCE and FELE test content and to engage in brain dumping after leaving the testing center.

13. During in-person and online training and tutoring sessions, Defendants **KATHLEEN M. JASPER** and **JEREMY M. JASPER**, and NavaEd employees and independent contractors discussed FTCE and FELE test content with NavaEd customers who already took the FTCE and FELE. **KATHLEEN M. JASPER, JEREMY M. JASPER**, and NavaEd employees and independent contractors memorialized these discussions with such NavaEd customers in writing and by electronic means.

14. The FTCE and FELE test content that **KATHLEEN M. JASPER, JEREMY M. JASPER**, and NavaEd employees and independent contractors obtained from harvesting, brain dumping, and from discussions with NavaEd students was republished – verbatim and almost verbatim – into NavaEd publications that were written to prepare examinees for the FTCE and FELE. These publications were offered for sale on the NavaEd website and through online merchants such as Amazon and Shopify. These publications and other NavaEd

FTCE and FELE preparation materials were also disseminated and used during NavaEd training seminars and tutoring sessions.

15. NavaEd received proceeds from the sale of its FTCE and FELE preparation publications, training seminars, and tutoring sessions by check and through electronic commerce (also known as “e-commerce”) and online payment companies, including PayPal, Square, and Intuit.

16. By all of the above-described conduct, Defendant **KATHLEEN M. JASPER** and Defendant **JEREMY M. JASPER** fraudulently obtained and attempted to obtain access to FTCE and FELE test content to which they were not entitled.

All in violation of Title 18, United States Code, Section 1349.

## **COUNTS THREE THROUGH ONE HUNDRED TEN**

### **Wire Fraud 18 U.S.C. § 1343**

#### **A. INTRODUCTION**

1. The allegations of Section A and B of Count One are hereby realleged and incorporated by reference as if fully set forth herein.

#### **B. THE CHARGE**

2. Between on or about March 24, 2016, and on or about March 10, 2020, in the Northern District of Florida and elsewhere, the defendants,



**KATHLEEN M. JASPER and  
JEREMY M. JASPER,**

did knowingly and willfully devise, and intend to devise, a scheme to defraud and for obtaining money and property, namely, proprietary FTCE and FELE test content owned by FLDOE and SBO, by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme, did cause a wire communication to be transmitted in interstate commerce.

**C. THE FRAUDULENT SCHEME**

3. The allegations of Section C of Count Two are hereby realleged and incorporated by reference as if fully set forth herein.

**D. EXECUTION OF THE SCHEME**

4. On or between the following dates, for the purpose of executing and attempting to execute the scheme to defraud, the defendants, **KATHLEEN M. JASPER** and **JEREMY M. JASPER**, did knowingly cause wire communications to be transmitted in interstate commerce, as set forth below:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>	<u>WIRE COMMUNICATION</u>
Three	Between on or about March 24, 2016 and on or about March 31, 2016	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper

Four	Between on or about April 6, 2016 and on or about May 6, 2016	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Five	Between on or about May 9, 2016 and on or about May 16, 2016	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Six	Between on or about May 10, 2016 and on or about May 17, 2016	Jeremy Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Seven	Between on or about May 12, 2016 and on or about June 11, 2016	Jeremy Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Eight	Between on or about May 19, 2016 and on or about June 18, 2016	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Nine	Between on or about June 17, 2016 and on or about June 24, 2016	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Ten	Between on or about July 14, 2016 and on or about August 13, 2016	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper

Eleven	Between on or about September 11, 2016 and on or about September 18, 2016	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Twelve	Between on or about September 29, 2016 and on or about October 6, 2016	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Thirteen	Between on or about September 14, 2016 and on or about October 14, 2016	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Fourteen	Between on or about October 24, 2016 and on or about October 31, 2016	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Fifteen	Between on or about October 4, 2016 and on or about November 3, 2016	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Sixteen	Between on or about November 3, 2016 and on or about November 10, 2016	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Seventeen	Between on or about October 25, 2016 and on or about November 24, 2016	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper

Eighteen	Between on or about November 7, 2016 and on or about December 7, 2016	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Nineteen	Between on or about December 18, 2016 and on or about December 25, 2016	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Twenty	Between on or about January 25, 2017 and on or about February 1, 2017	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Twenty-One	Between on or about January 4, 2017 and on or about February 3, 2017	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Twenty-Two	Between on or about February 20, 2017 and on or about February 27, 2017	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Twenty-Three	Between on or about January 31, 2017 and on or about March 2, 2017	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Twenty-Four	Between on or about February 27, 2017 and on or about March 6, 2017	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper

Twenty-Five	Between on or about March 15, 2017 and on or about March 22, 2017	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Twenty-Six	Between on or about February 27, 2017 and on or about March 29, 2017	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Twenty-Seven	Between on or about March 6, 2017 and on or about April 5, 2017	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Twenty-Eight	Between on or about April 5, 2017 and on or about April 12, 2017	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Twenty-Nine	Between on or about April 8, 2017 and on or about April 15, 2017	Jeremy Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Thirty	Between on or about April 8, 2017 and on or about April 15, 2017	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Thirty-One	Between on or about March 22, 2017 and on or about April 21, 2017	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper

Thirty-Two	Between on or about April 18, 2017 and on or about April 25, 2017	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Thirty-Three	Between on or about April 10, 2017 and on or about May 10, 2017	Jeremy Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Thirty-Four	Between on or about April 19, 2017 and on or about May 19, 2017	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Thirty-Five	Between on or about June 1, 2017 and on or about June 8, 2017	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding K.L.
Thirty-Six	Between on or about May 9, 2017 and on or about June 8, 2017	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Thirty-Seven	Between on or about June 27, 2017 and on or about July 4, 2017	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding K.L.
Thirty-Eight	Between on or about June 27, 2017 and on or about July 4, 2017	Jeremy Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding K.L.

Thirty-Nine	Between on or about June 6, 2017 and on or about July 6, 2017	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding K.L.
Forty	Between on or about July 3, 2017 and on or about July 10, 2017	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Forty-One	Between on or about June 28, 2017 and on or about July 28, 2017	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding K.L.
Forty-Two	Between on or about August 2, 2017 and on or about August 9, 2017	Jeremy Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Forty-Three	Between on or about July 20, 2017 and on or about August 19, 2017	Jeremy Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Forty-Four	Between on or about July 20, 2017 and on or about August 19, 2017	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Forty-Five	Between on or about September 21, 2017 and on or about October 21, 2017	Jeremy Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper



Forty-Six	Between on or about November 8, 2017 and on or about November 15, 2017	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding P.M.
Forty-Seven	Between on or about November 16, 2017 and on or about December 16, 2017	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding P.M.
Forty-Eight	Between on or about February 3, 2018 and on or about February 10, 2018	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding S.R.
Forty-Nine	Between on or about February 5, 2018 and on or about February 12, 2018	Jeremy Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Fifty	Between on or about February 8, 2018 and on or about March 10, 2018	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding S.R.
Fifty-One	Between on or about March 9, 2018 and on or about March 16, 2018	Jeremy Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Fifty-Two	Between on or about February 19, 2018 and on or about March 21, 2018	Jeremy Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper



Fifty-Three	Between on or about March 15, 2018 and on or about March 22, 2018	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding S.R.
Fifty-Four	Between on or about March 14, 2018 and on or about April 13, 2018	Jeremy Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Fifty-Five	Between on or about March 17, 2018 and on or about April 16, 2018	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding S.R.
Fifty-Six	Between on or about April 16, 2018 and on or about April 23, 2018	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Fifty-Seven	Between on or about April 18, 2018 and on or about April 25, 2018	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Fifty-Eight	Between on or about May 7, 2018 and on or about May 14, 2018	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding C.S.
Fifty-Nine	Between on or about May 10, 2018 and on or about May 17, 2018	Jeremy Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding K.L.

Sixty	Between on or about May 12, 2018 and on or about May 19, 2018	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Sixty-One	Between on or about May 15, 2018 and on or about May 22, 2018	Jeremy Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Sixty-Two	Between on or about May 3, 2018 and on or about June 2, 2018	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Sixty-Three	Between on or about May 7, 2018 and on or about June 6, 2018	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Kathleen Jasper
Sixty-Four	Between on or about May 14, 2018 and on or about June 13, 2018	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding C.S.
Sixty-Five	Between on or about May 21, 2018 and on or about June 20, 2018	Jeremy Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Sixty-Six	Between on or about May 29, 2018 and on or about June 28, 2018	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding K.L.

Sixty-Seven	Between on or about June 7, 2018 and on or about July 7, 2018	Jeremy Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Sixty-Eight	Between on or about June 8, 2018 and on or about July 8, 2018	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding K.L.
Sixty-Nine	Between on or about July 11, 2018 and on or about July 18, 2018	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding C.S.
Seventy	Between on or about August 8, 2018 and on or about August 15, 2018	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Seventy-One	Between on or about August 15, 2018 and on or about August 22, 2018	Jeremy Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.R.V.
Seventy-Two	Between on or about August 16, 2018 and on or about August 23, 2018	Jeremy Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Seventy-Three	Between on or about August 17, 2018 and on or about August 24, 2018	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.R.V.

Seventy-Four	Between on or about July 27, 2018 and on or about August 26, 2018	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding C.S.
Seventy-Five	Between on or about August 14, 2018 and on or about September 13, 2018	Jeremy Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Seventy-Six	Between on or about August 17, 2018 and on or about September 16, 2018	Jeremy Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding Jeremy Jasper
Seventy-Seven	Between on or about August 20, 2018 and on or about September 19, 2018	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.R.V.
Seventy-Eight	Between on or about August 21, 2018 and on or about September 20, 2018	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.R.V.
Seventy-Nine	Between on or about September 24, 2018 and on or about October 1, 2018	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.R.V.
Eighty	Between on or about September 25, 2018 and on or about October 25, 2018	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.R.V.

Eighty-One	Between on or about November 29, 2018 and on or about December 6, 2018	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.
Eighty-Two	Between on or about December 31, 2018 and on or about January 7, 2019	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.R.V.
Eighty-Three	Between on or about January 10, 2019 and on or about January 17, 2019	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.
Eighty-Four	Between on or about December 22, 2018 and on or about January 21, 2019	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.
Eighty-Five	Between on or about January 29, 2019 and on or about February 5, 2019	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding W.K.
Eighty-Six	Between on or about January 24, 2019 and on or about February 23, 2019	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.
Eighty-Seven	Between on or about February 1, 2019 and on or about March 3, 2019	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.R.V.

Eighty-Eight	Between on or about February 13, 2019 and on or about March 15, 2019	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding W.K.
Eighty-Nine	Between on or about April 10, 2019 and on or about April 17, 2019	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding W.K.
Ninety	Between on or about April 20, 2019 and on or about April 27, 2019	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.E.
Ninety-One	Between on or about April 22, 2019 and on or about April 29, 2019	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.V.
Ninety-Two	Between on or about May 1, 2019 and on or about May 31, 2019	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding W.K.
Ninety-Three	Between on or about May 2, 2019 and on or about June 1, 2019	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.V.
Ninety-Four	Between on or about May 4, 2019 and on or about June 3, 2019	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.E.

Ninety-Five	Between on or about June 13, 2019 and on or about June 20, 2019	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.E.
Ninety-Six	Between on or about June 18, 2019 and on or about June 25, 2019	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.
Ninety-Seven	Between on or about June 18, 2019 and on or about June 25, 2019	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.V.
Ninety-Eight	Between on or about June 24, 2019 and on or about July 1, 2019	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding W.K.
Ninety-Nine	Between on or about July 3, 2019 and on or about August 2, 2019	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.E.
One Hundred	Between on or about July 6, 2019 and on or about August 5, 2019	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding W.K.
One Hundred One	Between on or about July 11, 2019 and on or about August 10, 2019	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.



One Hundred Two	Between on or about July 12, 2019 and on or about August 11, 2019	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.V.
One Hundred Three	Between on or about January 10, 2020 and on or about January 17, 2020	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.V.
One Hundred Four	Between on or about February 5, 2020 and on or about February 12, 2020	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.
One Hundred Five	Between on or about January 14, 2020 and on or about February 13, 2020	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding J.V.
One Hundred Six	Between on or about February 28, 2020 and on or about March 6, 2020	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.
One Hundred Seven	Between on or about February 18, 2020 and on or about March 19, 2020	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.
One Hundred Eight	Between on or about February 21, 2020 and on or about March 22, 2020	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.



One Hundred Nine	Between on or about April 2, 2020 and on or about April 9, 2020	Kathleen Jasper	FTCE and FELE payment information and payment sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.
One Hundred Ten	Between on or about June 3, 2020 and on or about July 3, 2020	Kathleen Jasper	FTCE and FELE score information sent electronically from Minnesota, Massachusetts, and Iowa to Florida regarding A.W.

In violation of Title 18, United States Code, Sections 1343 and 2.

### **COUNT ONE HUNDRED ELEVEN**

#### **Conspiracy to Commit Theft of Trade Secrets 18 U.S.C. § 1832(a)(5)**

##### **A. INTRODUCTION**

1. The allegations of Sections A and B of Count One are hereby realleged and incorporated by reference as if fully set forth herein.
2. SBOE and FLDOE were the owners of FTCE and FELE test content, as defined in Title 18, United States Code, Section 1839(4). SBOE and FLDOE considered the FTCE and FELE test content a trade secret as defined in Title 18, United States Code, Section 1839(3).

##### **B. THE CHARGE**

3. Between on or about March 24, 2016, and on or about March 10, 2020, in the Northern District of Florida and elsewhere, the defendants,

**KATHLEEN M. JASPER and  
JEREMY M. JASPER,**

did knowingly and willfully combine, conspire, confederate, and agree together and with other persons, including “J.R.V.,” “A.W.,” “J.E.,” “W.K.,” “K.L.,” “P.M.,” “S.R.,” “C.S.,” and “J.V.,” to commit offenses against the United States, namely, with the intent to convert a trade secret belonging to SBOE and FLDOE that was related to a product and service used in, and intended for use in, interstate and foreign commerce, specifically, FTCE and FELE test content, to the economic benefit of a person other than the owner thereof, and intending and knowing that the offense would injure the owner of that trade secret, to knowingly:

- a. steal and without authorization appropriate, take, carry away, and by fraud, artifice, and deception obtain such information, in violation of Title 18, United States Code, Sections 1832(a)(1).
- b. copy, duplicate, upload, alter, replicate, transmit, deliver, send, mail, communicate, and convey such information, without authorization, in violation of Title 18, United States Code, Section 1832(a)(2).
- c. receive, buy, and possess such information, knowing the same to have been stolen or appropriated, obtained, or converted without authorization, in violation of Title 18, United States Code, Section 1832(a)(3).

### C. OVERT ACTS

4. At all times hereinafter mentioned, during the pendency of the conspiracy, the following overt acts were committed, in the Northern District of Florida and elsewhere, at least one of which furthered and effected the goals of said combining, conspiracy, confederacy, and agreement:

a	March 24, 2016	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf registered online for the FTCE and FELE to be taken on April 6, 2016 at Florida Gulf Coast University.
b	April 6, 2016	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
c	May 9, 2016	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf registered online for the FTCE and FELE to be taken on May 19, 2016 at Florida Gulf Coast University.
d	May 10, 2016	Defendant <b>JEREMY M. JASPER</b> or someone acting on his behalf paid for the FTCE and FELE to be taken May 12, 2016 at Florida Gulf Coast University.
e	May 12, 2016	Defendant <b>JEREMY M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
f	May 19, 2016	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
g	June 17, 2016	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf registered online for the FTCE and FELE to be taken on July 14, 2016 in Fort Myers, Florida.
h	July 14, 2016	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE in Fort Myers, Florida.
i	September 11, 2016	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken on September 14, 2016 in Fort Myers, Florida.

j	September 14, 2016	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE in Fort Myers, Florida.
k	September 29, 2016	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken on October 4, 2016 at Florida Gulf Coast University.
l	October 4, 2016	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
m	October 24, 2016	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken on October 25, 2016 at Florida Gulf Coast University.
n	October 25, 2016	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
o	November 3, 2016	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken on November 7, 2016 at Florida Gulf Coast University.
p	November 7, 2016	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
q	December 18, 2016	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken on January 4, 2017 at Florida Gulf Coast University.
r	January 4, 2017	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
s	January 25, 2017	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken on January 31, 2017 at Florida Gulf Coast University.
t	January 31, 2017	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
u	February 20, 2017	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken on February 27, 2017 at Florida Gulf Coast University.
v	February 27, 2017	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.

w	February 27, 2017	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken on March 6, 2017 at Florida Gulf Coast University.
x	March 6, 2017	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
y	March 15, 2017	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken March 22, 2017 at Florida Gulf Coast University.
z	March 22, 2017	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
aa	April 5, 2017	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken April 19, 2017 in Fort Myers, Florida.
ab	April 8, 2017	Defendant <b>JEREMY M. JASPER</b> or someone acting on his behalf paid for the FTCE and FELE to be taken April 10, 2017 in Fort Myers, Florida.
ac	April 8, 2017	Defendant <b>JEREMY M. JASPER</b> or someone acting on his behalf paid for the FTCE and FELE to be taken July 20, 2017 in Fort Myers, Florida.
ad	April 10, 2017	Defendant <b>JEREMY M. JASPER</b> appeared for and took the FTCE and FELE in Fort Myers, Florida.
ae	April 18, 2017	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken May 9, 2017 at Florida Gulf Coast University.
af	April 19, 2017	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE Fort Myers, Florida.
ag	May 9, 2017	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
ah	June 1, 2017	K.L. was registered for the FTCE and FELE to be taken on June 6, 2017 at Florida Gulf Coast University.
ai	June 6, 2017	K.L. appeared for and took the FTCE and FELE at Florida Gulf Coast University.

aj	June 27, 2017	K.L. was registered for the FTCE and FELE to be taken on June 28, 2017 at Florida Gulf Coast University.
ak	June 27, 2017	K.L. was registered for the FTCE and FELE to be taken on May 29, 2018 in Fort Myers, Florida.
al	June 28, 2017	K.L. appeared for and took the FTCE and FELE at Florida Gulf Coast University.
am	July 3, 2017	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken July 20, 2017 at Florida Gulf Coast University.
an	July 20, 2017	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
ao	July 20, 2017	Defendant <b>JEREMY M. JASPER</b> appeared for and took the FTCE and FELE in Fort Myers, Florida.
ap	August 2, 2017	Defendant <b>JEREMY M. JASPER</b> or someone acting on his behalf paid for the FTCE and FELE to be taken September 21, 2017 in Fort Myers, Florida.
aq	September 21, 2017	Defendant <b>JEREMY M. JASPER</b> appeared for and took the FTCE and FELE in Fort Myers, Florida.
ar	November 8, 2017	P.M. was registered for the FTCE and FELE to be taken on November 16, 2017 at Florida Gulf Coast University.
as	November 16, 2017	P.M. appeared for and took the FTCE and FELE at Florida Gulf Coast University.
at	February 3, 2018	S.R. or someone acting on S.R.'s behalf registered online for the FTCE and FELE to be taken on February 8, 2018 at Florida Gulf Coast University.
au	February 5, 2018	Defendant <b>JEREMY M. JASPER</b> or someone acting on his behalf paid for the FTCE and FELE to be taken February 19, 2018 in Fort Myers, Florida.
av	February 8, 2018	S.R. appeared for and took the FTCE and FELE at Florida Gulf Coast University.
aw	February 19, 2018	Defendant <b>JEREMY M. JASPER</b> appeared for and took the FTCE and FELE in Fort Myers, Florida.

ax	March 9, 2018	Defendant <b>JEREMY M. JASPER</b> or someone acting on his behalf paid for the FTCE and FELE to be taken March 14, 2018 at Florida Gulf Coast University
ay	March 14, 2018	Defendant <b>JEREMY M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
az	March 15, 2018	S.R. or someone acting on S.R.'s behalf registered online for the FTCE and FELE to be taken on March 17, 2018 in Fort Myers, Florida.
ba	March 17, 2018	S.R. appeared for and took the FTCE and FELE in Fort Myers, Florida.
bb	April 16, 2018	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken May 3, 2018 at Florida Gulf Coast University.
bc	April 18, 2018	Defendant <b>KATHLEEN M. JASPER</b> or someone acting on her behalf paid for the FTCE and FELE to be taken May 7, 2018 at Florida Gulf Coast University.
bd	May 3, 2018	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
be	May 7, 2018	Defendant <b>KATHLEEN M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
bf	May 7, 2018	C.S. was registered for the FTCE and FELE to be taken on May 14, 2018 at the University of Central Florida.
bg	May 10, 2018	K.L. was registered for the FTCE and FELE to be taken on June 8, 2018 in Fort Myers, Florida.
bh	May 12, 2018	Defendant <b>JEREMY M. JASPER</b> or someone acting on his behalf paid for the FTCE and FELE to be taken May 21, 2018 at South Florida State College.
bi	May 14, 2018	C.S. appeared for and took the FTCE and FELE at the University of Central Florida.
bj	May 15, 2018	Defendant <b>JEREMY M. JASPER</b> or someone acting on his behalf paid for the FTCE and FELE to be taken June 7, 2018 in Fort Myers, Florida.



bk	May 21, 2018	Defendant <b>JEREMY M. JASPER</b> appeared for and took the FTCE and FELE at South Florida State College.
bl	May 29, 2018	K.L. appeared for and took the FTCE and FELE in Fort Myers, Florida.
bm	June 7, 2018	Defendant <b>JEREMY M. JASPER</b> appeared for and took the FTCE and FELE in Fort Myers, Florida.
bn	June 8, 2018	K.L. appeared for and took the FTCE and FELE in Fort Myers, Florida.
bo	July 11, 2018	C.S. was registered for the FTCE and FELE to be taken on July 27, 2018 at the University of Central Florida.
bp	July 27, 2018	C.S. appeared for and took the FTCE and FELE at the University of Central Florida.
bq	August 8, 2018	Defendant <b>JEREMY M. JASPER</b> or someone acting on his behalf paid for the FTCE and FELE to be taken August 14, 2018 at Florida Gulf Coast University.
br	August 14, 2018	Defendant <b>JEREMY M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
bs	August 15, 2018	J.R.V. was registered for the FTCE and FELE to be taken on August 21, 2018 at Florida Gulf Coast University.
bt	August 16, 2018	Defendant <b>JEREMY M. JASPER</b> or someone acting on his behalf paid for the FTCE and FELE to be taken August 17, 2018 at Florida Gulf Coast University
bu	August 17, 2018	Defendant <b>JEREMY M. JASPER</b> appeared for and took the FTCE and FELE at Florida Gulf Coast University.
bv	August 17, 2018	Defendant <b>JEREMY M. JASPER</b> sent an email to a NavaEd customer about the FTCE and FELE that included FTCE and FELE test content.
bw	August 17, 2018	J.R.V. was registered for the FTCE and FELE to be taken on August 20, 2018 at Florida Gulf Coast University.
bx	August 20, 2018	J.R.V. appeared for and took the FTCE and FELE at Florida Gulf Coast University.



by	August 21, 2018	J.R.V. appeared for and took the FTCE and FELE at Florida Gulf Coast University.
bz	September 24, 2018	J.R.V. was registered for the FTCE and FELE to be taken on September 25, 2018 at Florida Gulf Coast University.
ca	September 25, 2018	J.R.V. appeared for and took the FTCE and FELE at Florida Gulf Coast University.
cb	November 29, 2018	A.W. was registered for the FTCE and FELE to be taken on December 22, 2018 in Fort Myers, Florida.
cc	December 22, 2018	A.W. appeared for and took the FTCE and FELE in Fort Myers, Florida.
cd	December 31, 2018	J.R.V. was registered for the FTCE and FELE to be taken on February 1, 2019 at Florida Gulf Coast University.
ce	January 10, 2019	A.W. was registered for the FTCE and FELE to be taken on January 24, 2019 at Florida Gulf Coast University.
cf	January 24, 2019	A.W. appeared for and took the FTCE and FELE at Florida Gulf Coast University.
cg	January 29, 2019	W.K. was registered for the FTCE and FELE to be taken on February 13, 2019 in Columbus, Ohio.
ch	February 1, 2019	J.R.V. appeared for and took the FTCE and FELE at Florida Gulf Coast University.
ci	February 13, 2019	W.K. appeared for and took the FTCE and FELE in Columbus, Ohio.
cj	April 10, 2019	W.K. was registered for the FTCE and FELE to be taken on May 1, 2019 in Columbus, Ohio.
ck	April 22, 2019	J.V. was registered for the FTCE and FELE to be taken on May 2, 2019 at Florida Gulf Coast University.
cl	May 1, 2019	W.K. appeared for and took the FTCE and FELE in Columbus, Ohio.
cm	May 2, 2019	J.V. appeared for and took the FTCE and FELE at Florida Gulf Coast University.
cn	June 18, 2019	A.W. was registered for the FTCE and FELE to be taken on July 11, 2019 at Florida Gulf Coast University.

co	June 18, 2019	J.V. was registered for the FTCE and FELE to be taken on July 12, 2019 at Florida Gulf Coast University.
cp	June 24, 2019	W.K. was registered for the FTCE and FELE to be taken on July 6, 2019 in Akron, Ohio.
cq	July 6, 2019	W.K. appeared for and took the FTCE and FELE in Akron, Ohio.
cr	July 11, 2019	A.W. appeared for and took the FTCE and FELE at Florida Gulf Coast University.
cs	July 12, 2019	J.V. appeared for and took the FTCE and FELE at Florida Gulf Coast University.
ct	January 10, 2020	J.V. was registered for the FTCE and FELE to be taken on January 14, 2020 at Florida Gulf Coast University.
cu	January 14, 2020	J.V. appeared for and took the FTCE and FELE at Florida Gulf Coast University.
cv	February 5, 2020	A.W. was registered for the FTCE and FELE to be taken on February 18, 2020 in Fort Myers, Florida.
cw	February 5, 2020	A.W. was registered for the FTCE and FELE to be taken on February 21, 2020 at Florida Atlantic University.
cx	February 18, 2020	A.W. appeared for and took the FTCE and FELE in Fort Myers, Florida.
cy	February 21, 2020	A.W. appeared for and took the FTCE and FELE at Florida Atlantic University.
cz	February 28, 2020	A.W. was registered for the FTCE and FELE to be taken on March 23, 2020 at Florida Atlantic University.
da	April 2, 2020	A.W. was registered for the FTCE and FELE to be taken on June 3, 2020 at Florida Atlantic University.
db	June 3, 2020	A.W. appeared for and took the FTCE and FELE at Florida Atlantic University.

All in violation of Title 18, United States Code, Section 1832(a)(5).

**COUNT ONE HUNDRED TWELVE**

**Theft of Trade Secrets  
18 U.S.C. §§ 1832(a)(1) and 2**

1. Between on or about March 24, 2016, and on or about March 10, 2020, in the Northern District of Florida and elsewhere, the defendants,

**KATHLEEN M. JASPER and  
JEREMY M. JASPER,**

with the intent to convert a trade secret belonging to SBOE and FLDOE that was related to a product and service used in, and intended for use in, interstate and foreign commerce, specifically, FTCE and FELE test content, to the economic benefit of a person other than the owner thereof, and intending and knowing that the offense would injure the owner of that trade secret, knowingly, did steal and without authorization appropriate, take, carry away, and by fraud, artifice, and deception obtain such information.

In violation of Title 18, United States Code, Sections 1832(a)(1) and 2.

**COUNT ONE HUNDRED THIRTEEN**

**Theft of Trade Secrets  
18 U.S.C. §§ 1832(a)(2) and 2**

1. Between on or about March 24, 2016, and on or about March 10, 2020, in the Northern District of Florida and elsewhere, the defendants,

**KATHLEEN M. JASPER and  
JEREMY M. JASPER,**

with the intent to convert a trade secret belonging to SBOE and FLDOE that was related to a product and service used in, and intended for use in, interstate and foreign commerce, specifically, FTCE and FELE test content, to the economic benefit of a person other than the owner thereof, and intending and knowing that the offense would injure the owner of that trade secret, knowingly, did copy, duplicate, upload, alter, replicate, transmit, deliver, send, mail, communicate, and convey such information, without authorization.

In violation of Title 18, United States Code, Section 1832(a)(2) and 2.

**COUNT ONE HUNDRED FOURTEEN**

**Theft of Trade Secrets  
18 U.S.C. §§ 1832(a)(3)**

1. Between on or about March 24, 2016, and on or about March 10, 2020, in the Northern District of Florida and elsewhere, the defendants,

**KATHLEEN M. JASPER and  
JEREMY M. JASPER,**

with the intent to convert a trade secret belonging to SBOE and FLDOE that was related to a product and service used in, and intended for use in, interstate and foreign commerce, specifically, FTCE and FELE test content, to the economic benefit of a person other than the owner thereof, and intending and knowing that the offense would injure the owner of that trade secret, knowingly, did receive,

buy, and possess such information, knowing the same to have been stolen or appropriated, obtained, or converted without authorization.

In violation of Title 18, United States Code, Section 1832(a)(3) and 2.

**FORFEITURE NOTICE**

**RACKETEERING FORFEITURE**

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. From their engagement in the violation alleged in Count One of this Indictment, the defendants,

**KATHLEEN M. JASPER and  
JEREMY M. JASPER,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963(a), any of the defendants' interests acquired or maintained in violation of Title 18, United States Code, Section 1962; any of the defendants' interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendants established, operated, controlled, conducted, or participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any of the defendants' property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962.

The United States will also seek a forfeiture money judgment for a sum of money equal to the value of any property, real or personal, which constitutes or is derived from proceeds traceable to this offense. The property to be forfeited includes, but is not limited to, the defendants' interest in the following:

1. NavaEd, LLC, a Florida Limited Liability Company having an FEI/EIN Number of 81-0916662 and all assets thereof,
2. The real property known as 19848 Beechcrest Place, Estero, FL 33928, lying and being in Lee County, Florida, and more particularly described in Instrument Number 2019000193383 of the Public Records of Lee County, Florida as follows:

LOT 653, BLOCK A, PLACE AT CORKSCREW – PHASE 2-A, ACCORDING TO THE PLAT THEREOF, AS RECORDED AS INSTRUMENT NUMBER 2018000143613, OF THE PUBLIC RECORDS OF LEE COUNTY, FLORIDA,

3. NavaEd publications and documents relating to the FTCE and FELE seized by the United States Department of Education, Office of the Inspector General, pursuant to search and seizure warrants executed on March 10, 2020, including, but not limited to, the following:

- a. FTCE K-6 Subject Area Exam 3rd Edition,
- b. FTCE 5-9 Math 1st Edition,
- c. FTCE 5-9 Math 2nd Edition,

- d. FTCE Business Education,
  - e. FTCE Professional Education 2nd Edition,
  - f. FTCE General Knowledge Test 2nd Edition
  - g. FTCE General Knowledge Test 3rd Edition,
  - h. FTCE English 6-12,
  - i. FTCE Middle Grades English 5-9,
  - j. FTCE Exceptional Student Education,
  - k. FTCE 6-12 Social Science,
  - l. FTCE PreK-3rd Grade Subject Area Exam,
  - m. FELE Subtests 1-3 Written Performance.
- 4. MacBook Air computer bearing serial number GCCYMH02J1WK,
  - 5. Apple iMac computer bearing serial number C02W58AHH7JY,
  - 6. Apple iPhone X model MQAN2LL/A bearing serial number  
G6TVPASFJCL9,
  - 7. Samsung Galaxy model S6 (64 GB) bearing serial number  
R38J40ASL1T,
  - 8. Black Western Digital WD My Passport External Hard Disk Drive  
bearing serial number WXJ1EA82S27,
  - 9. Black Seagate Portable Hard Disk Drive bearing serial number  
NAA5AC6V,

10. MacBook Air 13" bearing serial number C02P6GCAG940,
11. iPad Pro model MTFL2LL/A in a blue case and bearing serial number DLXy32KAK7RG,
12. Black Western Digital WD My Passport for Mac drive bearing serial number WXG1A3710J1C,
13. Apple iPad model MTXQ2LL/A in a brown case and bearing serial number DMPY23E3KD6L,
14. Apple iPhone Xs Max model MT612LL/A bearing serial number FFNXR5FUKPHJ,
15. Black Seagate Backup Plus Portable Drive model SRD00F1 bearing serial number NAAP5N5B,
16. Black SanDisk Cruzer Glide 16GB USB thumb drive bearing serial number SDCZ60-016G,
17. Apple iMac Retina 2019 bearing serial number C02YC1ZKJV3N,
18. iMac Retina (2017) bearing serial number C02W513XJ1G6,
19. Apple iMac model A1418 bearing serial number C02TL94PJ1G5,
20. Apple iMac bearing serial number C02T83LPGG7L.

If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendants:

- i. cannot be located upon the exercise of due diligence;



- ii. has been transferred, sold to, or deposited with a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

#### **TRADE SECRETS FORFEITURE**

The allegations contained in Counts One Hundred Eleven through One Hundred Fourteen of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. From their engagement in the violation alleged in Counts One Hundred Eleven through One Hundred Fourteen of this Indictment, the defendants,

**KATHLEEN M. JASPER and  
JEREMY M. JASPER,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 1834 and 2323, any and all of the defendants' right, title, and interest in any property, real and personal, constituting, and derived from, proceeds traceable to such offense, and any personal property that was used or intended to be used to

commit or to facilitate the commission of such offenses. The United States will also seek a forfeiture money judgment for a sum of money equal to the value of any property, real or personal, which constitutes or is derived from proceeds traceable to these offenses. The property to be forfeited includes, but is not limited to, the following:

1. The real property known as 19848 Beechcrest Place, Estero, FL 33928, lying and being in Lee County, Florida, and more particularly described in Instrument Number 2019000193383 of the Public Records of Lee County, Florida as follows:

LOT 653, BLOCK A, PLACE AT CORKSCREW – PHASE 2-A, ACCORDING TO THE PLAT THEREOF, AS RECORDED AS INSTRUMENT NUMBER 2018000143613, OF THE PUBLIC RECORDS OF LEE COUNTY, FLORIDA

2. NavaEd publications and documents relating to the FTCE and FELE NavaEd publications and documents relating to the FTCE and FELE seized by the United States Department of Education, Office of the Inspector General, pursuant to search and seizure warrants executed on March 10, 2020, including, but not limited to, the following:

- a. FTCE K-6 Subject Area Exam 3rd Edition,
- b. FTCE 5-9 Math 1st Edition,
- c. FTCE 5-9 Math 2nd Edition,

- d. FTCE Business Education,
  - e. FTCE Professional Education 2nd Edition,
  - f. FTCE General Knowledge Test 2nd Edition
  - g. FTCE General Knowledge Test 3rd Edition,
  - h. FTCE English 6-12,
  - i. FTCE Middle Grades English 5-9,
  - j. FTCE Exceptional Student Education,
  - k. FTCE 6-12 Social Science,
  - l. FTCE PreK-3rd Grade Subject Area Exam,
  - m. FELE Subtests 1-3 Written Performance.
- 3. MacBook Air computer bearing serial number GCCYMH02J1WK,
  - 4. Apple iMac computer bearing serial number C02W58AHH7JY,
  - 5. Apple iPhone X model MQAN2LL/A bearing serial number  
G6TVPASFJCL9,
  - 6. Samsung Galaxy model S6 (64 GB) bearing serial number  
R38J40ASL1T,
  - 7. Black Western Digital WD My Passport External Hard Disk Drive  
bearing serial number WXJ1EA82S27,
  - 8. Black Seagate Portable Hard Disk Drive bearing serial number  
NAA5AC6V,

9. MacBook Air 13" bearing serial number C02P6GCAG940,
10. iPad Pro model MTFLL2LL/A in a blue case and bearing serial number DLXy32KAK7RG,
11. Black Western Digital WD My Passport for Mac drive bearing serial number WXG1A3710J1C,
12. Apple iPad model MTXQ2LL/A in a brown case and bearing serial number DMPY23E3KD6L,
13. Apple iPhone Xs Max model MT612LL/A bearing serial number FFNXR5FUKPHJ,
14. Black Seagate Backup Plus Portable Drive model SRD00F1 bearing serial number NAAP5N5B,
15. Black SanDisk Cruzer Glide 16GB USB thumb drive bearing serial number SDCZ60-016G,
16. Apple iMac Retina 2019 bearing serial number C02YC1ZKJV3N,
17. iMac Retina (2017) bearing serial number C02W513XJ1G6,
18. Apple iMac model A1418 bearing serial number C02TL94PJ1G5,
19. Apple iMac bearing serial number C02T83LPGG7L.

If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendants:

- i. cannot be located upon the exercise of due diligence;

- ii. has been transferred, sold to, or deposited with a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Sections 1834 and 2323, to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

### **CRIMINAL FORFEITURE**

The allegations contained in Counts Two through One Hundred Ten of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. From their engagement in the violations alleged in Counts Two through One Hundred Ten of this Indictment, the defendants,

**KATHLEEN M. JASPER and  
JEREMY M. JASPER,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all of the defendants' right, title, and interest in any property, real and personal, constituting, and derived from, proceeds traceable to such offenses. The United States will also

seek a forfeiture money judgment for a sum of money equal to the value of any property, real or personal, which constitutes or is derived from proceeds traceable to these offenses. The property to be forfeited includes, but is not limited to, the following:

1. The real property known as 19848 Beechcrest Place, Estero, FL 33928, lying and being in Lee County, Florida, and more particularly described in Instrument Number 2019000193383 of the Public Records of Lee County, Florida as follows:

LOT 653, BLOCK A, PLACE AT CORKSCREW – PHASE 2-A, ACCORDING TO THE PLAT THEREOF, AS RECORDED AS INSTRUMENT NUMBER 2018000143613, OF THE PUBLIC RECORDS OF LEE COUNTY, FLORIDA

2. NavaEd publications and documents relating to the FTCE and FELE seized by the United States Department of Education, Office of the Inspector General, pursuant to search and seizure warrants executed on March 10, 2020, including, but not limited to, the following:

- a. FTCE K-6 Subject Area Exam 3rd Edition,
- b. FTCE 5-9 Math 1st Edition,
- c. FTCE 5-9 Math 2nd Edition,
- d. FTCE Business Education,
- e. FTCE Professional Education 2nd Edition,

- f. FTCE General Knowledge Test 2nd Edition
  - g. FTCE General Knowledge Test 3rd Edition,
  - h. FTCE English 6-12,
  - i. FTCE Middle Grades English 5-9,
  - j. FTCE Exceptional Student Education,
  - k. FTCE 6-12 Social Science,
  - l. FTCE PreK-3rd Grade Subject Area Exam,
  - m. FELE Subtests 1-3 Written Performance.
- 3. MacBook Air computer bearing serial number GCCYMH02J1WK,
  - 4. Apple iMac computer bearing serial number C02W58AHH7JY,
  - 5. Apple iPhone X model MQAN2LL/A bearing serial number  
G6TVPASFJCL9,
  - 6. Samsung Galaxy model S6 (64 GB) bearing serial number  
R38J40ASL1T,
  - 7. Black Western Digital WD My Passport External Hard Disk Drive  
bearing serial number WXJ1EA82S27,
  - 8. Black Seagate Portable Hard Disk Drive bearing serial number  
NAA5AC6V,
  - 9. MacBook Air 13" bearing serial number C02P6GCAG940,

10. iPad Pro model MTFL2LL/A in a blue case and bearing serial number DLXy32KAK7RG,

11. Black Western Digital WD My Passport for Mac drive bearing serial number WXG1A3710J1C,

12. Apple iPad model MTXQ2LL/A in a brown case and bearing serial number DMPY23E3KD6L,

13. Apple iPhone Xs Max model MT612LL/A bearing serial number FFNXR5FUKPHJ,

14. Black Seagate Backup Plus Portable Drive model SRD00F1 bearing serial number NAAP5N5B,

15. Black SanDisk Cruzer Glide 16GB USB thumb drive bearing serial number SDCZ60-016G,

16. Apple iMac Retina 2019 bearing serial number C02YC1ZKJV3N,

17. iMac Retina (2017) bearing serial number C02W513XJ1G6,

18. Apple iMac model A1418 bearing serial number C02TL94PJ1G5,

19. Apple iMac bearing serial number C02T83LPGG7L.

If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendant:

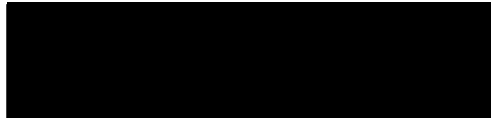
- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred, sold to, or deposited with a third party;



- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL:

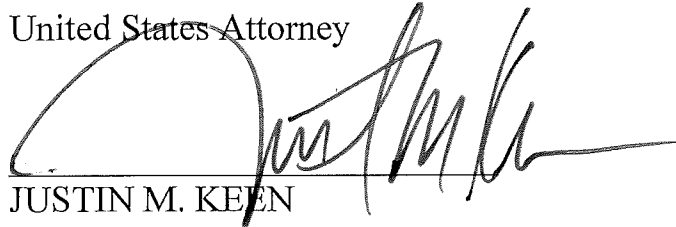


FOREPERSON

12/1/2020  
DATE



LAWRENCE KEEFE  
United States Attorney



JUSTIN M. KEEN  
Assistant United States Attorney