STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9: 25

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BLACK HAWK COUNTY, 18WA

COMPLAINT, AFFIDAVIT and ORDER

ANGELA	BIGELOW,
DOB: 06/3	

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ngela bigelow,	. !
OB: 06/30/1971	:
and a second sec	the defendant on or about the 2 nd Day of August, 2007, in the lift tampering with records relating to SLG in violation of Section Complainant
Subscribed and sworn to before me by	the said complainant on the day of April, 2010.
Subscribed wild amorti to perote imp of	James D Corl
•	Adary Hublic in the State of Towa
STATE OF IOWA,	
COUNTY OF BLACK HAWK, SS.	•
I, the undersigned, being first duly swo to me by other reliable persons form the basis for See Affidavit - Attachment A	om and under oath, state that the following facts known by me or told or my belief that the Defendant committed the crimes charged. Affiant
Subscribed and sworn to before me by	the said complainant on this the day of twee 2010.
	Magistrate/Judge or Notary Public in the State of Iowa
It is ordered that a summons be issued setting an appearance on the above referenced	by the Clerk of Court to the defendant at the last known address charge for the haday of April 2010 at 3:50 a.m./p-m-
	Magistrate/Judge, First Judicial District Black Hawk County, Iowa

CourtPolice	Prosecutor	Defendant
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IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

STATE OF IOWA V.	ZGIO APR -7 AM 9: 25 LERK OF DISTRICT COURT BEACK HAWK COUNTY, 10WA	CASE NO.
ANGELA BIGELOW &	and CONNIE)	AFFIDAVIT

In March of 2009, information came to law enforcement that indicated a number of patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration records of the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500 for the 2006/07 school year, \$526 for the 2007/08 school year and \$543 for the 2008/09 school year. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning-in". For a patron to "tuition-in" a student must receive permission of the PLS administration and pay the "per pupil fee" set by the legislature. For the 2006/07 school year the per-pupil fee was \$5,135.00. For the 2007-2008 school year the "per-pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$5,500.00.

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

Prior to the 2008/09 school year patrons were required to complete registration of existing students by filling out hard copy forms. To register a student who was an existing PLS student a "Registration and Information" form was required to be filed with the school. The form required the parent's and student's residential address,

among other information. If the student was a first year student either beginning school or transferring from another district an "Enrollment Application and Transfer Form" was required to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning with the 2008/09 school year PLS used a computerized program to register students. The name of the program was *Power Schools*. According to Aaron Spurr of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. During the registration process the parent is required to provide the residential address of the student and parent. In setting the appropriate fee, PLS relied on the information provided by the parent registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the alleged false records. Initially, the information concerning false addresses had been discovered in an internal audit conducted by the University of Northern Iowa. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

Angela Bigelow resides at 318 West 5th Street, Cedar Falls, IA. Bigelow resides at the 5th Street address with her child SLG. Bigelow is unmarried. Bigelow has resided on West 5th Street for approximately 11 years. SLG's father is William Grover who resides at 2408 Woodland Drive, Cedar Falls, IA. To this affiant's knowledge SLG does not reside with her biological father. 318 West 5th Street, Cedar Falls, IA and the Woodland Drive address are outside the residential and buffer zone of PLS.

SLG has attended PLS since the 2006/07 school year.

On August 2, 2007, Angela Bigelow completed a form entitled "Registration Information". On the form Bigelow listed a residential address of 1211 West 19th Street, Cedar Falls, IA. The form also lists William Grover as living at 1211 west 19th Street, Cedar Falls, IA. Her true address and the true address of William Grover are not listed on the "Registration Information" form.

1211 West 19th Street, Cedar Falls, IA is an address within the residential zone of the PLS.

It was learned that Glenn and Fredda Holmes reside at 1211 West 19th Street, Cedar Falls, IA. The Holmes' have resided at this address since 1990 and are the Uncle

and Aunt of William Grover. In an interview they confirmed that SLG and William Grover had not ever resided with them on West 19th Street. Just before the interview with DCI Connie Bigelow was at their residence and told them that she had used their address for her granddaughter to attend the PLS. Connie Bigelow is the mother of Angela Bigelow and a secretary at PLS. It should be noted that agents who interviewed the Holmes observed Connie Bigelow driving away from their residence as they were arriving.

During an interview Angela Bigelow confirmed her address as stated above. Angela Bigelow stated that she was aware the address listed on her daughter's registration form was false. Angela Bigelow stated that her mother Connie wanted her daughter to attend school at PLS and told her what address to put on the form.

As a secretary for PLS, Connie Bigelow is aware of the fees and tuition of resident and non-resident students. According to former and current staff members at PLS it was common knowledge that Connie Bigelow's granddaughter attended PLS and paid the lower amount without living in the residential or buffer zone. Connie Bigelow in an interview admitted to knowing that a patron had to pay a higher amount if living outside the zone. Connie Bigelow claimed that William Grover had rented the property at 1211 West 19th Street Cedar Falls, IA. Connie Bigelow admitted to telling Angela Bigelow to record an incorrect address to allow SLG to attend PLS without paying the "tuition-in" amount. Connie Bigelow stated that the only ones who could afford the higher tuition were physicians.

As part of any registration a fee contract is be executed by the parent and the school. Connie Bigelow's signature was confirmed on the fee contract for SLG for the 2007/08 school year.

Angela Bigelow's daughter resided outside the Price Laboratory School zone. Bigelow would be required to "tuition-in" her daughter SLG. If the proper tuition fee is applied, less the fees paid, Angela Bigelow would be billed \$5,135 for 2006/2007, \$5,333 for 2007/2008 and \$5,500 for 2008/2009 for a total bill of \$15,968.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,

Plaintiff,

Case No. 01071 AGCR168181

VS

SUMMONS

ANGELA LYN BIGELOW

Pefendant.

)

TO: ANGELA LYN BIGELOW 318 W 5TH ST CEDAR FALLS IA 50613

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the 22ND day of APRIL , 2010 , at 8:30 A.M. for a INITIAL APPEARANCE with respect to a Complaint that has been filed charging you with the offense of TAMPERING W/RECORDS

You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10 .

DISTRICT ASSOCIATE OUDGE/

Copies to: Sheriff

STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9: 25

STATE OF IOWA

LERK OF DISTRICT COURT BLACK HAWA COUNTY, 18WA

CASENO. AGGR 16876

٧.

COMPLAINT, AFFIDAVIT and ORDER

CONNIE ARLENE BIGELOW,

DOB: 04/23/1947

Comes Now the State of Iowa and accuses Connie Bigelow of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about the 2nd Day of August, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to SLG in violation of Section 715A.5 of the Iowa Criminal Code.

	Companie C.
Subscribed and sworn to before me by the said	d complainant on the 1th day of April 2010.
	James D. Col
	Nothry Public in the State of lowe
E OF IOWA,	000

STATE OF IOWA, COUNTY OF BLACK HAWK, SŞ.

I the undersigned, being first duly swom ar	nd under oath, state that the following facts known by me or told
to me by other reliable nersons form the basis for my	belief that the Defendant committed the crimes charged.
See Affidavit - Attachment A	Latte Bleen
	x win Mer
1 *	A Promit

Subscribed and sworn to before me by the said complainant on this 7th day of 12010.

Magistrate/Judge or Notary Public in the State of Iowa

ORDER

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the day of day of 2010 at 3:30 a.m./parts

Magistrate/Judge, First Judicial District Black Hawk County, Iowa

Court	Police	Prosecutor	Defendant
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IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

	ZUTU APR -/ AM 9: 25	
STATE OF IOWA	BLACK HAWK COUNTY, 19WA CASE N	O
V.	AFFIDA	VIT
ANGELA BIGELOW and C BIGELOW	CONNIE)	
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As it relates to the above referenced defendant the following information was learned.

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SLG has attended PLS since the 2006/07 school year.

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1211 West 19th Street, Cedar Falls, IA is an address within the residential zone of the PLS.

It was learned that Glenn and Fredda Holmes reside at 1211 West 19th Street, Cedar Falls, IA. The Holmes' have resided at this address since 1990 and are the Uncle

and Aunt of William Grover. In an interview they confirmed that SLG and William Grover had not ever resided with them on West 19th Street. Just before the interview with DCI Connie Bigelow was at their residence and told them that she had used their address for her granddaughter to attend the PLS. Connie Bigelow is the mother of Angela Bigelow and a secretary at PLS. It should be noted that agents who interviewed the Holmes observed Connie Bigelow driving away from their residence as they were arriving.

During an interview Angela Bigelow confirmed her address as stated above. Angela Bigelow stated that she was aware the address listed on her daughter's registration form was false. Angela Bigelow stated that her mother Connie wanted her daughter to attend school at PLS and told her what address to put on the form.

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IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IONA,

plaintiff,

plaintiff,

Case No. 01071 AGCR168176

BUMMONS

CONNIE A BIGELOW

Defendant.

TO: CONNIE A BIGELOW

1716 W 18TH ST APT 201

CEDAR FALLS TA \$0613

TO THE ABOVE NAMED INDIVIDUAL:

floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the

22ND day of APRIL , 2010 , at 8:30 A.M. for a

INITIAL APPEARANCE with respect to a Complaint that has been

filed charging you with the offense of TAMPERING W/RECORDS .

You should report to the court attendant's desk outside the large

courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10 .

DISTRICT ASSOCIATE JUDGE/

MAGISTRATE

Copies to: Sheriff

COUNTY OF BLACK HAWK STATE OF IOWA

2610 APR -7 AM 9: 24

STATE OF IOWA

LERK OF DISTRICT COURT BLACK HAWK COUNTY, IOWA

CASENO. AGORIL8174

COMPLAINT, AFFIDAVIT and ORDER

KERRY LYNN BURT, DOB: 12/17/64,

Count One

Comes Now the State of Iowa and accuses Kerry Lynn Burtof the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about August 16, 2007, in the County of Black TED in violation of Section 715A5 of the lowa

aggravated introduction, commit tampering with	h records relating to STB in violation of Section 713A3 of the town
Criminal Code.	Count Two
aggravated misdemeanor, committed as follows Hawk, State of Iowa, did commit tampering will Criminal Code.	complainant Agrael Agrael Tampering with Records, an extra defendant on or about August 16, 200%, in the County of Black the defendant on or about August 16, 200%, in the County of Black the records relating to ICB in violation of Section 715A.5 of the Iowa
Subscribed and sworn to before me b	the said complainant on the day of day of , 2010.
STATE OF IOWA, COUNTY OF BLACK HAWK, SS.	Indge
	worn and under oath, state that the following facts known by me or told for my belief that the Defendant committed the crimes charged. Affiant

Subscribed and sworn to before me by the said complainant on this 7th day of April

Magistrate/Judge or Notary Public in the State of Iowa

ORDER

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the day of the 2010 at 2010 a

Magistrate/Judge, First Judicial District Black Hawk County, Iowa

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	Police	Prosecutor	Defendant
Court	POINCE		

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IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY 2010 APR -7 AM 9: 24

STATE OF IOWA	LERK OF DISTRICT COURT BLACK HAWK COURTY, 10WA	CASE NO
V.)	AFFIDAVIT
KERRY LYNN BURT) : !	

In March of 2009, information came to law enforcement that indicated a number of patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration records of the PLS.

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required to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning with the 2008/09 school year PLS used a computerized program to register students. The name of the program was *Power Schools*. According to Aaron Spurr of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. During the registration process the parent is required to provide the residential address of the student and parent. In setting the appropriate fee, PLS relied on the information provided by the parent registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the alleged false records. Initially, the information concerning false addresses had been discovered in an internal audit conducted by the University of Northern Iowa. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

Kerry Lynn Burt resides at 150 Hawthorne Avenue in Waterloo, IA. He resides at the address with his wife and two children, STB and ICB. It was learned that Burt has resided at this address for the past 13 years.

One or more of the Burt children have attended PLS since the 2003/04 school year.

Burt claims to have attempted to open enroll his children from the Waterloo Community District into PLS. However, there is no record that would confirm this attempt from PLS or the Waterloo Community School District.

On August 16, 2007, Kerry Burt completed a form entitled "Enrollment Application and Transfer Form" to apply for the admission of STB into PLS. On the form Burt listed an address for STB of 1815 Franklin Street, Cedar Falls, IA. Burt also completed a form dated August 16, 2007, for STB entitled "Registration Information". On the form Burt listed a residential address of 1815 Franklin Street, Cedar Falls, IA for himself and for STB.

Burt completed a form dated August 16, 2007, for ICB entitled "Registration Information". On the form Burt listed a residential address of 1815 Franklin Street, Cedar Falls, IA for himself and for ICB.

1815 Franklin Street, Cedar Falls, IA is an address within the residential zone of the PLS.

The address of 1815 Franklin Street belongs to Marguerite Pircer. Ms. Pircer is an acquaintance of Kerry Burt. Ms. Pircer indicated that the defendant and the Burt children have never resided at her home on Franklin Street. Ms. Pircer indicated that she would occasionally receive mail for the children at her address which she would forward to the defendant.

The defendant was interviewed by an agent with the Iowa DCI. During the interview the defendant admitted to using the address on Franklin Street to obtain residential status for his children. The defendant indicated that everyone at the school was aware of his actual address and he never tried to conceal it from anyone at the school.

It appears from school records obtained during the investigation that the defendant has always maintained on official school records that his children reside at 1815 Franklin Street in Cedar Falls, IA.

Based upon the auditor's findings, it was determined that Burt used a false address beginning in the 2003/04 school year through 2008/09. It was determined that Burt owes \$37,139 (thirty-seven thousand one hundred thirty-nine dollars) to the Price Lab Schools in proper tuition and registration fees.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,

Plaintiff,

CRES NO. 01071 AGCR168174

CRES NO. 01071 AGCR168174

SUMMONS

KERRY LYNN BURT

Defendant.

TO: KERRY LYNN BURT

150 HAWTHORNE AVE

WATERLOO IA 50702

TO THE ABOVE NAMED INDIVIDUAL:

floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the 22ND day of APRIL , 2010 , at 8:30 A.M. for a INITIAL APPEARANCE with respect to a Complaint that has been filed charging you with the offense of TAMPERING W/RECORDS .

You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10 .

DISTRICT ASSOCIATE JUDGE/

MAGISTRATE

Copies to: Sheriff

STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9: 25

STATE OF IOW.	A
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BLACK HAWK COUNTY, 18WA

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COMPLAINT, AFFIDAVIT and ORDER

FLOR	A	D	Eŀ	<u>(O</u>	CK,
DOB:	10	/1	0/1	97	7

	uses Flora DeKock of the crime of Tampering with Records, an the defendant on or about the 16 th Day of July, 2007, in the County ering with records relating to JRL in violation of Section 715A.5 of
of Black Hawk, State of Iowa, did commit tamp the Iowa Criminal Code.	a la
	Complainant
Subscribed and swom to before me by	de a leasuration on the Heday of April 2010.
Subscribed and sworn to before me by	the said complainant on the

STATE OF IOWA, COUNTY OF BLACK HAWK, SS.

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged. See Affidavit - Attachment A

Subscribed and sworn to before me by the said complainant on this_

rate/Judge or Notary Public in the State of Iowa

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the last known address a.m./

Magistrate/Judge, First Judicial District Black Hawk County, Iowa

Court	Police	Prosecutor	Defendant
CASURE	 		

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

	7619 APR -7 AM 9: 25	
STATE OF IOWA	BLACK HAWK CORNTY, IOWA	CASE NO
V.)	AFFIDAVIT
)	ALL IDALLE
FLORA DEKOCK	ý	
•	•)	

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required to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning with the 2008/09 school year PLS used a computerized program to register students. The name of the program was *Power Schools*. According to Aaron Spurr of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. During the registration process the parent is required to provide the residential address of the student and parent. In setting the appropriate fee, PLS relied on the information provided by the parent registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the alleged false records. Initially, the information concerning false addresses had been discovered in an internal audit conducted by the University of Northern Iowa. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

In school year 2007/08 Flora DeKock resided at 929 Rainbow Drive, Cedar Falls, IA. She resided at the address with her son JRL. The Rainbow Drive address is not in the residential or buffer zone of PLS. Currently Flora DeKock resides at 1207 West 19th Street, Cedar Falls, IA. which is in the residential zone of PLS.

JRL has attended PLS since the 2005/06 school year.

On July 16, 2007, Flora DeKock completed the "Registration Information" form to enroll JRL at PLS. On the form DeKock listed a residential address for JRL of 1210 West 19th Street, Cedar, Falls, IA. DeKock listed her address at 929 Rainbow Drive, Cedar Falls, IA.

1210 West 19th Street Cedar Falls, IA is an address within the residential zone of the PLS.

The address of 1210 West 19th Street belongs to Walter DeKock who is the father of Flora DeKock. Mr. DeKock indicated that the defendant and JRL have never resided at his home on West 19th Street. Mr. DeKock indicated that he would occasionally receive mail for JRL at his address which he would forward to the defendant. Mr. DeKock also stated that he never had any type of guardianship of JRL.

The defendant was interviewed by an agent with the Iowa DCI. During the interview the defendant admitted to using the address 1210 West 19th Street to obtain residential status for her child in the 2007/08 school year. The defendant indicated that she believed everyone at the school was aware of her actual address.

It appears from school records obtained during the investigation that the defendant has always maintained on official school records that her child resides at 1210 West 19th Street in Cedar Falls, IA until she moved to 1207 West 19th Street, Cedar Falls, IA

Flora DeKock resided outside the PLS zone in 2007/2008 and was not eligible for open enrollment and should have "tuitioned-in" and been charged a higher fee. When proper fees are applied for the school years 2005/2006 through 2007/2008 the total owed is \$15,406 minus the previous fees applied of \$1,501.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,

Plaintiff,

Case No. 01071 AGCR168179

VB

PLOKA LANGEL JOYCE DEKOCK

Defendant.

)

TO: FLORA LANGEL JOYCE DEKOCK 1207 W 19TH ST CEDAR FALLS IA 50613

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first

floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the

22nd day of APRIL , 2010 , at 8:30 A.M. for a

INITIAL APPEARANCE with respect to a Complaint that has been

filed charging you with the offense of TAMPERING W/RECORDS .

You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's

Office provide the defendant with personal service of a copy of

this order.

Dated 04/07/10 .

DISTRICT ASSOCIATE JUDGE/

Copies to: Sheriff

STATE OF IOWA, COL ZGIO APR -7 AM 9: 27

	THE STEE	
STATE OF IOWA	ERK OF DISTRICT COUR	CASE NO. NOCCE, 1601 CONTROL OF THE COMPLAINT, AFFIDAVIT and ORDER
V.	erack hyan Colista 191	COMPLAINT, AFFIDAVIT and ORDER
•		1
KRISTI ANN EASTMAN, DOB: 03/07/1969		
DOB: 03/07/17/09	Count One	:
aggravated misdemeanor, commits County of Black Hawk, State of Ic 715A.5 of the Iowa Criminal Code	ted as follows: the detendant on one of the own, did commit tampering with rece. Count Two	of the crime of Tampering with Records, an bout the 1st Day of September, 2008, in the ords relating to LE in violation of Section
aggravated misdemeanor, commit County of Black Hawk, State of I	ted as follows: the defendant on or one of the commit tampering with reconstructions with reconstructions and the commit tampering with reconstructions.	n of the crime of Tampering with Records , an about the I st day of September, 2008, in the cords relating to CE in violation of Section
715A.5 of the Iowa Criminal Cod	Count Three	
aggravated misdemeanor, commi County of Black Hawk, State of I 715A.5 of the Iowa Criminal Con Subscribed and sworn t	tted as follows: the defendant of of lowa, did commit tampering with rede. Com o before me by the said complainant	an of the crime of Tampering with Records, an about the 1st day of September, 2008, in the cords relating to WWF in violation of Section plainant to on the day of April 2010. Ty Public in the State of Towa Judge
COUNTY OF BLACK HAWI	K, SS.	C. Harris of Facts Isnayon by me or told
to me by other reliable persons : See Affidavit - Attachment A	ng first duly sworn and under oath, form the basis for my belief that the Affiant to before me by the said complaina	nt on this Land Description of Notary Public in the State of You
		_ :
Court Po	lice Prosecuto	r Defendant

			<u>ORDER</u>		
It is ordered that a su setting an appearance on the a	mmons be issued bove referenced c	by the Cle	rk of Court to the defer the Lay of	idant at the la	ast known address at 8:36 a.m./p.m
		,	Magistrate/Judge Black Hawk Cou	LONE	1. Con
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Count	Police		Prosecutor		Defendant

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

	7001 BPR -7 AM 9: 27	
	2010111	
STATE OF IOWA	BLACK HAWK COUNTY, 10WA	CASE NO.
V) :	AFFIDAVIT
TODD T. EASTMAN and KRISTI ANN EASTMAN) ;	
	. !	

In March of 2009, information came to law enforcement that indicated some patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration forms provided by the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically completely within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning in". For a patron to "tuition-in" a student they must receive permission of PLS administration and pay the "per pupil fee" set by the legislature. For the 2007-2008 school year the "per pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

In the 2008/09 school year PLS began using a computerized program to register students. The name of the program was Power Schools. According to Aaron Spur of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. The school relied on the information provided by the patron registering the student. The passwords were unique to each family and not

individuals. There would be no way of telling which parent or guardian accessed the account to register student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the listing of the false address. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

Todd T. and Kristi Ann Eastman reside at 1491 Newell Street in Waterloo, IA. Neither Todd or Kristi Eastman have ever resided at 1615 or 1611 Washington Street in Cedar Falls, IA. Both addresses belong to Barry Eastman, Todd Eastman's older brother. The Eastman's reside at the Newell Street address with their children LE, CE and WWE. It was learned that the Eastman's have resided at the Newell address for approximately the past 10 years.

One or more of the Eastman children have attended PLS since the 2006/07 school year.

The defendants never attempted to open enroll their children from the Waterloo Community School District into PLS. This information was confirmed by Laurie Wery of the Waterloo Community School District who indicated as such to Linda Nielsen, the University of Iowa internal auditor.

Either Todd or Kristi Eastman accessed the Power Schools account to register each of their children, LE, CE and WWE at PLS for the 2008/09 school year. On past registrations the parent registering the children was Kristi Eastman. The only persons able to access and register the children listed below are the defendants Todd and Kristi Eastman.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for LE as 1615 Washington Street, Cedar Falls, IA. The demographics of an individual student are a record maintained electronically by the PLS computer system.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for CE as 1615 Washington Street, Cedar Falls, IA.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for WWE as 1615 Washington Street, Cedar Falls, IA.

1615 Washington Street, Cedar Falls, IA is an address within the residential zone of the PLS.

The only source of the information entered into Power Schools whereby the demographic document was generated would be Todd and Kristi Eastman.

During an interview Kristi Eastman stated that she and her husband are living apart and that Todd Eastman resided, at least part of the time with the children, at 1615 Washington Street. During the interview she was unable to provide verification.

In 2008 when the children were registered with the PLS, a letter dated September 11, 2008, was sent from Dave Smith, Director of PLS, to both Todd and Kristi Eastman requesting they send verification as to their address of 1615 Washington. In an e-mail and attachment sent back to the school on September 17, 2008, Kristi Eastman provided a bank statement from Lincoln Savings Bank in Reinbeck, IA indicating an address of 1615 Washington Street, Cedar Falls, IA. The bank statement was titled in the names of Todd and Kristi Eastman.

In March of 2009, Todd Eastman obtained a driver's license with the residential address of 1615 Washington, Cedar Falls, IA despite the fact that he did not reside at that address. In letter dated September 11, 2008, a driver's license was a form of address verification requested by PLS. Mr. Eastman during an interview indicated that he resided, at least part time, at 1615 Washington Street, Cedar Falls, IA. He also indicated that there was a second dwelling at 1611 Washington Street, Cedar Falls, IA. During his interview Mr. Eastman stated that when his children visited him at the Washington Street residence they would stay at the property located at 1611 Washington Street. It was learned during the investigation that this was untrue. Alissa Wagner has rented the house at 1611 Washington from Barry Eastman since July of 2008. During the time she rented the property Todd Eastman has never resided there nor is she familiar with Todd Eastman or his children.

The address of 1615 Washington Street belongs to Barry Eastman. Barry Eastman indicated that the defendant and the Eastman children have never resided at either 1615 or 1611 Washington Street, Cedar Falls, IA. Barry Eastman indicated that he would occasionally receive mail for the children at his address which he would forward to the defendant. Prior to receiving the mail for the children he was told by Todd Eastman that he would be receiving mail for them from the PLS school.

Beginning with the 2006/07 and ending with the 2008/09 school year it was determined, based upon the proper per pupil fee, the Eastman's owed \$33,755 to the PLS.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,

Plaintiff,

Case No. 01071 AGCR168182

VS

SUMMONS

KRISTI ANN EASTMAN

Defendant,

TO: KRISTI ANN EASTMAN 1491 NEWELL ST WATERLOO IA 50703

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the 22ND day of APRIL , 2010 , at 8:30 A.M. for a INITIAL APPEARANCE with respect to a Complaint that has been filed charging you with the offense of TAMPERING W/RECORDS .

You should report to the court attendant's deak outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10 .

DISTRICT ASSOCIATE GUDGE/ MAGISTRATE

Copies to: Sheriff

STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9: 25

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317	, LE	Or.	10	٧¥	12

LERN OF DISTRICT COICASE NO. A GCZ 168(80)

v:

COMPLAINT, AFFIDAVIT and ORDER

DOB: 12/31/1966

Count One

Comes Now the State of Iowa and accuses Todd T. Eastman of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about the 1st Day of September, 2008, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to LE in violation of Section 715A.5 of the Iowa Criminal Code.

Count Two

Comes Now the State of Iowa and accuses Todd T. Eastman of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about the 1st day of September, 2008, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to CE in violation of Section 715A.5 of the Iowa Criminal Code.

Count Three

Comes Now the State of Iowa and accuses Todd T. Eastman of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about the 1⁵¹ day of September, 2008, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to WWE in violation of Section 715A.5 of the Iowa Criminal Code.

Subscribed and sworn to before me by the said complainant on the 7th

lotary Public in the State of Iowa

STATE OF IOWA, COUNTY OF BLACK HAWK, SS.

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.

See Affidavit - Attachment A

Subscribed and sworn to before me by the said complainant on this 76

plainant on this day of 1921, 2010.

Magistrate/Judge or Notary Public in the State of Iowa

Court Police Prosecutor Defendant

	ORDER
It is ordered that a summons be issued by the setting an appearance on the above referenced charge	e Clerk of Court to the defendant at the last known address for the 27 modiay of April 2010 at 8:50 a.m./g
	Magistrate/Judge, First Judicial District
	Black Hawk County, Iowa
•	

Court	Police	Prosecutor	Defendant
Court			Deletionit

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

STATE OF IOWA	ERK OF DISTRICT DOURT BLACK HAWK COUNTY, 19WA	CASE NO
٧.)	AFFIDAVIT
TODD T. EASTMAN KRISTI ANN EASTM	and) AN)	

In March of 2009, information came to law enforcement that indicated some patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration forms provided by the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically completely within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning in". For a patron to "tuition-in" a student they must receive permission of PLS administration and pay the "per pupil fee" set by the legislature. For the 2007-2008 school year the "per pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

In the 2008/09 school year PLS began using a computerized program to register students. The name of the program was Power Schools. According to Aaron Spur of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. The school relied on the information provided by the patron registering the student. The passwords were unique to each family and not

individuals. There would be no way of telling which parent or guardian accessed the account to register student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the listing of the false address. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

Todd T. and Kristi Ann Eastman reside at 1491 Newell Street in Waterloo, IA. Neither Todd or Kristi Eastman have ever resided at 1615 or 1611 Washington Street in Cedar Falls, IA. Both addresses belong to Barry Eastman, Todd Eastman's older brother. The Eastman's reside at the Newell Street address with their children LE, CE and WWE. It was learned that the Eastman's have resided at the Newell address for approximately the past 10 years.

One or more of the Eastman children have attended PLS since the 2006/07 school year.

The defendants never attempted to open enroll their children from the Waterloo Community School District into PLS. This information was confirmed by Laurie Wery of the Waterloo Community School District who indicated as such to Linda Nielsen, the University of Iowa internal auditor.

Either Todd or Kristi Eastman accessed the Power Schools account to register each of their children, LE, CE and WWE at PLS for the 2008/09 school year. On past registrations the parent registering the children was Kristi Eastman. The only persons able to access and register the children listed below are the defendants Todd and Kristi Eastman.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for LE as 1615 Washington Street, Cedar Falls, IA. The demographics of an individual student are a record maintained electronically by the PLS computer system.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for CE as 1615 Washington Street, Cedar Falls, IA.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for WWE as 1615 Washington Street, Cedar Falls, IA.

1615 Washington Street, Cedar Falls, IA is an address within the residential zone of the PLS.

The only source of the information entered into *Power Schools* whereby the demographic document was generated would be Todd and Kristi Eastman.

During an interview Kristi Eastman stated that she and her husband are living apart and that Todd Eastman resided, at least part of the time with the children, at 1615 Washington Street. During the interview she was unable to provide verification.

In 2008 when the children were registered with the PLS, a letter dated September 11, 2008, was sent from Dave Smith, Director of PLS, to both Todd and Kristi Eastman requesting they send verification as to their address of 1615 Washington. In an e-mail and attachment sent back to the school on September 17, 2008, Kristi Eastman provided a bank statement from Lincoln Savings Bank in Reinbeck, IA indicating an address of 1615 Washington Street, Cedar Falls, IA. The bank statement was titled in the names of Todd and Kristi Eastman.

In March of 2009, Todd Eastman obtained a driver's license with the residential address of 1615 Washington, Cedar Falls, IA despite the fact that he did not reside at that address. In letter dated September 11; 2008, a driver's license was a form of address verification requested by PLS. Mr. Eastman during an interview indicated that he resided, at least part time, at 1615 Washington Street, Cedar Falls, IA. He also indicated that there was a second dwelling at 1611 Washington Street, Cedar Falls, IA. During his interview Mr. Eastman stated that when his children visited him at the Washington Street residence they would stay at the property located at 1611 Washington Street. It was learned during the investigation that this was untrue. Alissa Wagner has rented the house at 1611 Washington from Barry Eastman since July of 2008. During the time she rented the property Todd Eastman has never resided there nor is she familiar with Todd Eastman or his children.

The address of 1615 Washington Street belongs to Barry Eastman. Barry Eastman indicated that the defendant and the Eastman children have never resided at either 1615 or 1611 Washington Street, Cedar Falls, IA. Barry Eastman indicated that he would occasionally receive mail for the children at his address which he would forward to the defendant. Prior to receiving the mail for the children he was told by Todd Eastman that he would be receiving mail for them from the PLS school.

Beginning with the 2006/07 and ending with the 2008/09 school year it was determined, based upon the proper per pupil fee, the Eastman's owed \$33,755 to the PLS.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,

Plaintiff,

Plaintiff,

SUMMONS

TODD T EASTMAN

Defendant,

TO: TODD T EASTMAN

WATERLOO IA 50703

TO THE ABOVE NAMED INDIVIDUAL:

1491 NEWELL ST

You are hereby ordered by the Court to appear on the first

floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the

22ND day of APRIL , 2010 , at 8:30 A.M. for a

INITIAL APPEARANCE with respect to a Complaint that has been

filed charging you with the offense of TAMPERING W/RECORDS .

You should report to the court attendant's desk outside the large

courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10 .

DISTRICT ASSOCIATE JUDGE/

Magietrate

Copies to: Sheriff

STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9: 25

STATE OF IOWA

JEACK HAWK COUKTY, 10WA

V.

COMPLAINT, AFFIDAVIT and ORDER

ANGIE LINN GILBERT, DOB: 01/16/1977

Count One

Comes Now the State of Iowa and accuses Angie L. Gilbert of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about the 2nd Day of August, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to CAG in violation of Section 715A.5 of the Iowa Criminal Code.

Count Two

Comes Now the State of Iowa and accuses Angie L. Gilbert of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about the 2nd Day of August, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to KAG in violation of Section 715A.5 of the Iowa Criminal Code.

Count Three

Comes Now the State of Iowa and accuses Argie E. Gilbert of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about the 2nd Day of August, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to CG in violation of Section 715A.5 of the Iowa Criminal Code.

Subscribed and sworn to before me by the said complainant on the day of April 2010.

Notely Public in the State of Iowa

STATE OF IOWA, COUNTY OF BLACK HAWK, SS.

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.

See Affidavit - Attachment A

Affiant
Subscribed and sworn to before me by the said complainant on this day of April 2010

Mag strate/Judge or Notary Public in the State of Iowa

Court Police Prosecutor Belefidant	Court	Police	Proseculor	Defendant
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It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the standard lay of Appeal 2010 at \$1.00 a.m./parameters. Amelian and the standard layers are standard layers and the standard layers and the standard layers are standard layers. The standard layers are standard layers and the standard layers are standard layers and the standard layers are standard layers and the standard layers are standard layers. The standard layers are standard layers and the standard layers are standard layers. The standard layers are standard layers are standard layers and the standard layers are standard layers. The standard layers are standard layers are standard layers are standard layers. The standard layers are standard layers are standard layers are standard layers. The standard layers are standard layers are standard layers are standard layers. The standard layers are standard layers are standard layers are standard layers. The standard layers are standard layers are standard layers are standard layers. The standard layers are standard layers are standard layers are standard layers. The standard layers are standard layers are standard layers are standard layers. The standard layers are standard layers are standard layers are standard layers.			Q	RDER		
Magistrate/Judge, First Judicial District Black Hawk County, Iowa	It is ordered setting an appearance	that a summons be isseen on the above reference	sued by the Clerk o	f Court to the defend	lant at the last known addition 2010 at 8 130 a	ress .m./ p∞m
				James	D. Coil	
			•			
		·				
				·		
Court Police Prosecutor Defendant			,			

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

	2010 APR -7 AM 9: 25	, , , , , , , , , , , , , , , , , , , ,
STATE OF IOWA	LERK OF DISTROT UGURT GLACK HAWK COUNTY, 18WA	CASE NO
٧.)	AFFIDAVIT
ANGIE L. GILBERT)))	

In March of 2009, information came to law enforcement that indicated a number of patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration records of the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500 for the 2006/07 school year, \$526 for the 2007/08 school year and \$543 for the 2008/09 school year. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning in". For a patron to "tuition-in" a student must receive permission of the PLS administration and pay the "per pupil fee" set by the legislature. For the 2006/07 school year the per-pupil fee was \$5,135.00. For the 2007-2008 school year the "per-pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$5,500.00.

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

Prior to the 2008/09 school year patrons were required to complete registration of existing students by filling out hard copy forms. To register a student who was an existing PLS student a "Registration and Information" form was required to be filed with the school. The form required the parent's and student's residential address, among other information. If the student was a first year student either beginning school or transferring from another district an "Enrollment Application and Transfer Form" was

required to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning with the 2008/09 school year PLS used a computerized program to register students. The name of the program was *Power Schools*. According to Aaron Spurr of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. During the registration process the parent is required to provide the residential address of the student and parent. In setting the appropriate fee, PLS relied on the information provided by the parent registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the alleged false records. Initially, the information concerning false addresses had been discovered in an internal audit conducted by the University of Northern Iowa. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

During the 2007/08 Angie L. Gilbert resided at 235 Denver Street, Waterloo, IA. She resided at the address with her husband and three children CAG, KAG and CG. It was learned that Gilbert resided at this address for 2 years prior to the 07/08 school year.

Gilbert attempted to open enroll her children out of the Waterloo Community School District but was denied.

One or more of the Gilbert children have attended PLS since the 2003/04 school year. The children were taken out of PLS for the 2009/10 school year when the family relocated to Texas.

On March 26, 2007, Angie Gilbert completed a form entitled "Enrollment Application and Transfer Form" to apply for the admission of CAG into PLS. On the form Gilbert listed an address for CAG of 1910 Clay Street, Cedar Falls, IA. Gilbert also completed a form dated August 2, 2007, for CAG entitled "Registration Information". On the form Gilbert listed a residential address of 1910 Clay Street, Cedar Falls, IA for herself and for CAG.

Gilbert completed a form dated August 2, 2007, for KAG entitled "Registration Information". On the form Gilbert listed a residential address of 1910 Clay Street, Cedar Falls, IA for herself and for KAG.

Gilbert completed a form dated August 2, 2007, for CG entitled "Registration Information". On the form Gilbert listed a residential address of 1910 Clay Street, Cedar Falls, IA for herself and for CG.

1910 Clay Street, Cedar Falls, IA is an address within the residential zone of the PLS.

The address of 1910 Clay Street belongs to Michael and Vicki Gilbert who are the grandparents of the aforementioned children. Ms. Gilbert indicated that the defendant and the Gilbert children have never resided at her home on Clay Street. Ms. Gilbert that she knew it was wrong to have the kids use her address but she did not want them to go to Waterloo schools.

The defendant was interviewed by an agent with the Iowa DCI. During the interview the defendant admitted to entering an address on registration records where her family did not reside. The defendant admitted to using the address to enable her children to be able to attend PLS.

It appears from school records obtained during the investigation that the defendant has always maintained on official school records that her children reside at 1910 Clay Street, Cedar Falls, IA.

Angie Gilbert and her family resided outside the PLS zone and should have "tuitioned-in" at the per pupil fee. From the 2003/2004 school year through 2008/2009 with proper fees applied minus the fees paid, the Gilbert's would owe \$47,701 to the PLS system.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,

Plaintiff,

Case No. 01071 AGCR168177

SUMMONS

ANGIE LYNN GILBERT

Defendant.

TO: ANGLE LYNN GILBERT 235 DENVER ST WATERLOO IA 50702

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the 22ND day of APRIL , 2010 , at 8:30 A.M. for a INITIAL APPEARANCE with respect to a Complaint that has been filed charging you with the offense of TAMPERING W/RECORDS .

You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's.

Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10 .

DISTRICT ASSOCIATE JUDGE/ MAGISTRATE

Copies to: Sheriff

STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9: 24

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BLACK HAWK COURTY, IQWA COMPLAINT, AFFIDAVIT and ORDER

٧.

STEPHANIE KAY HOVEY,

DOB: 07/24/1976

Comes Now the State of Iowa and accuses Stephanie K. Hovey of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about the 17th Day of July, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to OMH in violation of Section 715A.5 of the Iowa Criminal Code.

Subscribed and sworn to before me by the said complainant on the Hay of April 2010.

Notary Public in the State of Iowa

STATE OF IOWA, COUNTY OF BLACK HAWK, SS.

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.

See Affidavit - Attachment A

Affiant

Subscribed and sworn to before me by the said complainant on this 7th day of April 2010

Magistrate/Judge or Notary Public in the State of Iowa

<u>ORDER</u>

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the Landay of Hyper 2010 at 8:30 a.m./p.m.

Mag strate/Judge, First Judicial District Black Hawk County, lowa

Court	Police	Prosecutor	Defendant
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IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

	2010 APR 7 AM 9-24	
STATE OF IOWA	LERK OF DIETRICT COURT BLACK HAWKICOUNTY, IOWA CASE NO.	
V.) AFFIDAVIT	
STEPHANIE KAY HOVEY)))	

In March of 2009, information came to law enforcement that indicated a number of patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration records of the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500 for the 2006/07 school year, \$526 for the 2007/08 school year and \$543 for the 2008/09 school year. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning in". For a patron to "tuition-in" a student must receive permission of the PLS administration and pay the "per pupil fee" set by the legislature. For the 2006/07 school year the per-pupil fee was \$5,135.00. For the 2007-2008 school year the "per-pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$5,500.00.

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

Prior to the 2008/09 school year patrons were required to complete registration of existing students by filling out hard copy forms. To register a student who was an existing PLS student a "Registration and Information" form was required to be filed with the school. The form required the parent's and student's residential address, among other information. If the student was a first year student either beginning school or transferring from another district an "Enrollment Application and Transfer Form" was

required to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning with the 2008/09 school year PLS used a computerized program to register students. The name of the program was *Power Schools*. According to Aaron Spurr of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. During the registration process the parent is required to provide the residential address of the student and parent. In setting the appropriate fee, PLS relied on the information provided by the parent registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the alleged false records. Initially, the information concerning false addresses had been discovered in an internal audit conducted by the University of Northern Iowa. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

During the 2007/08 Stephanie Hovey resided at 919 Baltimore Street, Waterloo, IA. She resided at the address with her child OMH. Hovey and OMH's father are divorced. Beginning in June of 2007, Hovey resided at 810 Catherine Street, Cedar Falls, IA. This address is not in the residential or buffer zone of the PLS.

OMH has attended PLS since the 2007/08 school year.

Hovey completed a form to register OMH with PLS dated July 17, 2007, entitled "Registration Information". On the form Hovey listed a residential address for OMH and for herself of 1476 Laurel Street, Cedar Falls, IA.

1476 Laurel Street, Cedar Falls, IA is an address within the residential zone of the PLS.

The address of 1476 Laurel Street belongs to Jerry and Alma Backstrom who are the parents of Hovey. Hovey indicated during an interview that she was using her parent's address to drop off her son during her pending divorce. Hovey indicated that she was not aware of the additional tuition and fees. It appears that OMH nor Hovey resided at 1476 Laurel Street.

It appears from school records obtained during the investigation that the defendant has always maintained on official school records that OMH resided at 1476 Laurel Street, Cedar Falls, IA.

Stephanie Hovey was not approved for open enrollment and lived outside the PLS zone. When proper registration fees were applied, Stephanie Hovey owed tuition for the 2007/2008 and 2008/2009 school year in the amount of \$10,833. Minus the fees previously paid of \$1,006, Hovey owes a total of \$9,754 PLS system.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAMK COUNTY

STATE OF IOWA,

Plaintiff,

Plaintiff,

STEPHANIE RAY HOVEY

Defendant.

STATE OF IOWA,

Case No. 01071 AGCR168175

SUMMONS

SUMMONS

Defendant.

TO: STEPHANIE KAY HOVEY 810 CATHERINE ST CEDAR FALLS IA 50613-2455

TO THE ABOVE NAMED INDIVIDUAL:

You are bereby ordered by the Court to appear on the first

floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the

22ND day of APRIL , 2010 , at 8:20 A.M. for a

INITIAL APPEARANCE with respect to a Complaint that has been

filed charging you with the offense of TAMPERING W/RECORDS .

You should report to the court attendant's dock outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10 .

DISTRICT ASSOÇIATE JUDGE/ MAGISTRATE

Copies to: Sheriff

STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9: 25

STATE OF IOWA	STA	TE	OF	Ю	W	Α
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LERK OF DISTRICT COUR CASE NO. AGCRIGSTS
BLACK HAWK COURTY, 18WA

V.

COMPLAINT, AFFIDAVIT and ORDER

<u>CF</u>

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	08/06/1962	
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Records, 2007, in	Comes Now the State of Iowa and accuses Cheryl A. Longnecker of the ds, an aggravated misdemeanor, committed as follows: the defendant on or in the County of Black Hawk, State of Iowa, did commit tampering with rection 715A.5 of the Iowa Criminal Code.	about the 17 th Day of August,
	Complainant	- Chee
;	Subscribed and swom to before me by the said complainant on the	he State of Iowa
STATE	TE OF IOWA,	ge
	NTY OF BLACK HAWK, SS.	
	I, the undersigned, being first duly sworn and under oath, state that the i	ollowing facts known by me or toid
to me by	by other reliable persons form the basis for my belief that the Defendant co	onimited the crimes charged.
See Ains	ffidavit - Attachment A	Alle
	Affiant	
	/AL	b A 1
	Subscribed and sworn to before me by the said complainant on this 1	day of 2010.
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		S. D. Cal
	Magdatata Budga	or Notary Public in the State of Iowa
	inagistato/Judge	of 1400ath 1 government of 1000a
	ORDER	

setting a	It is ordered that a summons be issued by the Clerk of Court to the defe g an appearance on the above referenced charge for the	ndant at the last known address 2010 at 8:30 (a.m./p.m.
	Jame	sD. Coil
	Magistrate/Judg Black Hawk Cor	e, First Judicial District anty, Iowa

Defendant_ Court Police_ Prosecutor .

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

	100 APR -7 AM 9:25	
STATE OF IOWA	LERK OF DISTRIOT COURT BLACK HAWK COURTY, 10WA	CASE NO.
V.		AFFIDAVIT
CHERYL ANNE LONG	NECKER)	

In March of 2009, information came to law enforcement that indicated some patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration forms provided by the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically completely within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500 for the 2006/07 school year, \$526 for the 2007/08 school year and \$543 for the 2008/09 school year. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning in". For a patron to "tuition-in" a student must receive permission of the PLS administration and pay the "per pupil fee" set by the legislature. For the 2006/07 school year the per-pupil fee was \$5,135.00. For the 2007-2008 school year the "per-pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$5,500.00.

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

Prior to the 2008/09 school year parents were required to complete registration of existing students by filling our hard copy forms. To register a student who was an existing PLS student a "Registration and Information" form was required to be filed with the school. The form required the parent's and student's residential address, among other information. If the student was a first year student either beginning school

or transferring from another district an "Enrollment Application and Transfer Form" was require to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning in with the 2008/09 school year PLS used a computerized program to register students. The name of the program was Power Schools. According to Aaron Spur of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. The school relied on the information provided by the patron registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the listing of the false address. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

Cheryl Longnecker resides at 5408 Norse Drive, Cedar Falls, IA an address outside the residential and buffer zone of PLS. Cheryl Longnecker is divorced from Jim Longnecker. Together they have a child at PLS whose initials are PML.

PML has attend PLS since the 2007/08 school year.

On August 17, 2007, Cheryl Longnecker completed a form entitled "Enrollment Application and Transfer Form" to apply for the admission of PML into PLS. On the form Longnecker listed an address for PML of 1901 18th Street, Cedar Falls, IA. Longnecker also completed a form dated August 7, 2007, for PML entitled "Registration Information". On the form Longnecker listed a residential address for PML of 1901 18th Street, Cedar Falls, IA.

1901 18th Street, Cedar Falls, IA is an address within the residential zone of the PLS. Neither Cheryl Longnecker, Jim Longnecker or PML have resided at 1901 18th Street, Cedar Falls, IA

It was learned during the investigation that 1901 18th Street, Cedar Falls, IA was an apartment complex named Point West. Cheryl Longnecker's older daughter Taylor Longnecker resided in the apartment complex in apartment C4. Law enforcement investigating the allegations attempted to make contact with the residents at apartment C4 but could get no one to answer the door. It was learned that two additional persons resided at apartment C4, John Williams and Cody Hashman.

Taylor Longnecker, Williams and Hashman were all interviewed. Each gave information indicating that PML was not a resident of 1901 18th Street Apartment C4, Cedar Falls, IA. Each also indicated that Jim Longneck and PML were occasional visitors to the apartment but were not a residents. None indicated that Jim Longnecker paid rent or any of the expenses associated with the apartment nor was he listed as a tenant on a lease.

Cheryl Longnecker indicated in her interview that PML resided at 1901 18th Street, Apartment C4, Cedar Falls, IA. Longnecker stated that because she lived outside the zone, Jim Longnecker lived at the apartments so PML could attend PLS. Cheryl Longnecker indicated that she and Jim Longnecker were getting divorced however it was not final

If proper fees were charged for school years 2007/2008 and 2008/2009 the proper fee would be \$11,902 minus fees paid of \$2,138. The proper fees currently owed by the Longneckers to PLS are \$9,764.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,

| Plaintiff, | Case No. 01071 AGCR168178
| VS | SUMMONS |
| CHERYL ANNE LONGNECKER | |
| Defendant. |

TO: CHERYL ANNE LONGNECKER 5408 NORSE DR CEDAR PALLS IA 50613-7607

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first

floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the

22ND day of APRIL , 2010 , at 8:30 A.M. for a

INITIAL APPEARANCE with respect to a Complaint that has been

filed charging you with the offense of TAMPERING W/RECORDS ...

You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10 .

DISTRICT ASSOCIATE JUDGE/

Magietrate

tames D. Coil

Copies to: Sheriff