

No. 14-10499

IN THE UNITED STATES COURT OF APPEALS

FOR THE NINTH CIRCUIT

UNITED STATES OF AMERICA,

Plaintiff-Appellee,

v.

SUSAN XIAO-PING SU,

Defendant-Appellant.

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**GOVERNMENT'S SUPPLEMENTAL EXCERPTS OF RECORD  
VOLUME II OF II**

APPEAL FROM THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
NO. 11-CR-0288 JST

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
BEFORE THE HONORABLE JON S. TIGAR

UNITED STATES OF AMERICA, )  
 ) Volume 8  
Plaintiff, ) Pages 1333 - 1547  
 )  
VS. ) NO. 11-00288 JST  
 )  
SUSAN XIAO-PING SU, )  
 ) San Francisco, California  
Defendant. ) Monday, March 17, 2014  
 ) 8:25 a.m.

**TRANSCRIPT OF COURT PROCEEDINGS**

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Computerized Transcription By Case CATalyst

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E X H I B I T S

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1 they had ties with. So yeah, they gave me the list, and  
2 Tri-Valley University happened to be one of them.

3 Q. Now, did you do any research about Tri-Valley University?

4 A. They did give some information about it, and then I went  
5 through the website. That's the extent of the search I did.

6 Q. What did you notice on the website?

7 A. First thing I saw is -- I think it was in the homepage -- I  
8 saw it was written that the university is Christian-run --  
9 not-for-profit Christian-run university. So --

10 Q. Why did that stand out to you?

11 A. I'm a Christian, and in India, we -- we believe that any  
12 universities which is more Christian or Catholic-run happens to  
13 have -- compared to the others, has a higher reliability  
14 when -- you can rely on better education if it's Christian-run.  
15 So it's something we believe in India.

16 So that kind of happened, and then I'm a Christian, and so  
17 I have that extra -- I don't know -- trust towards that. There  
18 is a trust factor which made me go for it.

19 Q. Was there anything else that you particularly noticed about  
20 the website?

21 A. The website did -- it didn't look very professional. I'm  
22 not sure if that's the right word. I would say a flashy -- it  
23 didn't look very flashy, anything like other university  
24 websites. But then again, since it -- it stated it's a  
25 not-for-profit, obviously, I didn't have too much expectations

1 well -- so I was -- both of us were expecting -- when it's a  
2 student -- you know, a student from the university, a  
3 representative from the university, and transportation also  
4 from the university. So we were expecting something like a  
5 minivan or something which has the university's name and  
6 everything written on the van.

7 Q. Let me just stop you for a moment.

8 A. Yeah.

9 Q. When you say both of you and "we," are you referring to you  
10 and your friend?

11 A. Yes. Yes, because -- because both of us come together for  
12 the same university.

13 Q. And what is your friend's name?

14 A. Susanna Varghese.

15 Q. Okay. Please --

16 (Court reporter clarification.)

17 THE WITNESS: Varghese, V-a-r-g-h-e-s-e.

18 BY MS. WEST:

19 Q. Please continue.

20 A. So that's when we were expecting -- so that's what we had  
21 in mind when we say it's university transportation, but he  
22 comes up in a very shabby-looking car, and we were taken aback.  
23 We were not expecting that, and when we tried to get in, we  
24 were shocked to see -- there were, like, open beer cans and  
25 cigarette butts and used cigarettes strewn all around the car



1 floor.

2 So we rushed out at that point in time, but then we didn't  
3 have any options because we were new. We didn't have anyone  
4 who we knew. So this was the point of contact given to us. So  
5 we just went ahead with that.

6 Q. Did you have any conversation with Mr. Karra about  
7 Tri-Valley University?

8 A. Yeah. So that was another shocker. We were -- he was  
9 taking us to this place, accomm- -- supposedly, we were  
10 thinking an accommodation, but then he starts saying that  
11 "There's no university like this. I don't know why you guys  
12 came here. You applied for some wrong university. First of  
13 all, there's no university. We go and check that place. It's  
14 not a good university. It's some small room or something."

15 So we were shocked because he is supposed to be the  
16 representer from the university, and we just didn't know what  
17 to say. He keeps saying this, and then -- then we had in mind  
18 that probably he would have had some kind of fall with the  
19 university and probably that's why he's just saying the things.

20 Q. Let me just stop you for a moment, please.

21 Do I understand correctly that Mr. Karra was supposed to be  
22 the representative of Tri-Valley University? Is that right?

23 A. Yes.

24 Q. And then he was telling you there is no university?

25 A. Yes.

1 Q. Did you have a conversation with Susan Su on that day --  
2 and can you remind us, please, approximately what day was this.

3 A. Should be end of May or -- yeah, end of May.

4 Q. Okay. We're still in May. Then yes.

5 A. Yeah, May or probably first week of June.

6 THE COURT: This is 2010?

7 THE WITNESS: '10.

8 BY MS. WEST:

9 Q. When you were at Tri-Valley University on that day, did you  
10 have a discussion with Susan Su about the possibility of your  
11 transferring?

12 A. Yes. I did ask her if I can get -- transfer to another  
13 university because I'm not very sure of joining this  
14 university.

15 Q. How did she respond?

16 A. So she -- she -- she did get angry at me because I think  
17 she was -- I mean, she did not expect me to get a transfer  
18 probably. So she did get angry at me, and she did tell that  
19 it's not possible because there's a rule that states that you  
20 have to do two semesters in that university. Whichever  
21 university your visa is on, you have to do two semesters there  
22 before you get a transfer to another university.

23 Q. Had you heard of that rule before?

24 A. No.

25 Q. What was your reaction?

1 A. Sorry.

2 Q. Sorry. I need to finish asking the question for the court  
3 reporter. Thank you.

4 When she showed you the computer screen, what was she  
5 showing you?

6 A. She was trying to show me that there was just the option of  
7 terminating and not transferring, but I couldn't see -- the  
8 text was small. So I was not obviously looking at it much.  
9 So -- so she was just trying to show me that it's -- you can  
10 only terminate -- she can only terminate me and not transfer.

11 So -- yeah. So she says, "This is how it is, and if you  
12 want me to just terminate, I can just click it and terminate,  
13 and that's all I can do."

14 Q. And so did you tell her that you wanted her to go ahead and  
15 terminate you?

16 A. Yes, and since Karra gave me the go-ahead, it's -- since  
17 he's a representer of that university, and so I just went by  
18 his word and asked her to terminate me.

19 Q. And did you see her terminate you?

20 A. Yeah. She just -- I think just clicked it and terminated.

21 Q. I'm sorry. She clicked a button?

22 A. Yeah, just clicked a button, and she said I'm terminated  
23 now. "You can just" -- "you can go ahead with your" --  
24 "whatever you have in mind, want to do."

25 Q. Did you then make any efforts to transfer?

1 A. Yes. So I went back to the other university and talked to  
2 the dean, and they -- again, the whole process of -- I give the  
3 transcripts, and they issued me a new I-20. And when --  
4 after -- after two or three days, the dean -- the DSO calls me  
5 and says that I got -- "I'm not able to activate your I-20  
6 because" --

7 MR. BABCOCK: Objection. Move to strike. Hearsay,  
8 your Honor.

9 MS. WEST: It's --

10 THE COURT: The objection --

11 MS. WEST: It's being offered for the effect on the  
12 listener, your Honor.

13 THE COURT: I'll let the witness finish and answer,  
14 and I may strike it in a moment.

15 Go ahead.

16 THE WITNESS: So he calls me and says that he -- he's  
17 not able to activate my I-20 because I was supposed to get  
18 transferred from the other university, and since you are  
19 terminated -- since I'm terminated, he's not able to activate  
20 my I-20.

21 BY MS. WEST:

22 Q. Based on that information, did you do anything?

23 A. Yes. So -- so again, I was confused, and I didn't know how  
24 to go about the whole thing because everything -- all these  
25 paperworks were in India through the consultancy. So I was not

1 sure how to go through the whole thing.

2 So I asked for his advice, the DSO from the new university,  
3 and he said, "Yeah. This is the only way. You should get a  
4 transfer from the university, and since you are terminated,  
5 it's" -- "you don't have" -- so at that point in time, I  
6 realized that I don't even have a status to stay over here  
7 because unfortunately I'm not even a student at that point in  
8 time since she -- since she terminated me.

9 Q. Based on your conversation with the DSO from that other  
10 school, did you reapproach Susan Su?

11 A. Yes. So I tried -- before that, I tried -- because the DSO  
12 said, "Why don't you just talk to the USCIS and ask them for  
13 their advice. Tell them what happened and see what they can do  
14 about it, if they can reinstate the" -- "the status."

15 Q. Okay. And let me stop you again. You mentioned USCIS.  
16 What is that?

17 MR. BABCOCK: I'm sorry, your Honor. Can we -- can I  
18 get a ruling on my earlier objection?

19 THE COURT: Overruled.

20 MR. BABCOCK: Thank you.

21 BY MS. WEST:

22 Q. What is USCIS?

23 A. It's supposed to be the department for immigration  
24 services. That's what I know.

25 Q. Okay. And so from your conversation -- did you contact

1 CIS?

2 A. Yes, I did.

3 Q. Okay. So from your conversation with the DSO from that  
4 other school and with CIS, did you reapproach Susan Su about  
5 the transfer?

6 A. Yes.

7 Q. And what conversation did you have with Susan Su?

8 A. So I talked to her and told her that, "Well, because you've  
9 terminated, I'm not able to get admission in the other  
10 university. So is there any way you can help me out with the  
11 transfer?"

12 She said, "That's not possible because you are terminated."  
13 So I -- since she can -- she did tell me that it's not  
14 possible. So that's it.

15 So one -- I'm not sure who I discussed with -- if it was  
16 Vishal or -- I think it -- between all this, I had talked to  
17 Vishal about all this, and he also advised me to just talk to  
18 Susan Su, and that's -- that's when I talked to her, and she  
19 said she can take me back into that -- into Tri-Valley  
20 University and not transfer me.

21 Q. Okay. So do I understand right that Susan Su said she  
22 could -- she couldn't transfer you but she could take you back  
23 to Tri-Valley?

24 A. Yes. Yes.

25 Q. And what did you do?

1 she closed the doors of the building and left. So we were kind  
2 of -- we were locked inside the building.

3 Q. How do you know you were locked inside as opposed to just  
4 the door closed?

5 A. Well, she did -- I did see her using a key to lock it, and  
6 I did try to open and leave, but I couldn't open.

7 Q. Who was locked inside?

8 A. It was me, my friend, and Vishal and the other guy, four of  
9 us.

10 Q. Approximately how long did Susan Su lock you inside the  
11 Tri-Valley office?

12 A. An hour.

13 Q. I'm sorry. About an hour?

14 A. Yeah.

15 Q. Were you able to eat lunch?

16 A. Yeah. We brought our lunch. I brought my lunch.

17 Q. How many hours did you work that day?

18 A. Eight hours, I guess. Yeah, eight.

19 Q. And were you paid?

20 A. Yes.

21 Q. How much did Susan Su pay you?

22 A. \$60.

23 Q. At some point, did you receive a transcript from Tri-Valley  
24 University?

25 A. Yeah, I did get a transcript, more than one transcripts.

1 subjects. She gave me I-20, registration I-20.

2 Q. Did you pay any tuition that day?

3 A. Yes.

4 Q. Did you --

5 A. I paid a thousand dollars in check.

6 MR. RHYNE: Your Honor, may I approach the witness?

7 THE COURT: You may.

8 (Government's Exhibit 530 marked for identification.)

9 BY MR. RHYNE:

10 Q. I'm going to hand you what we've marked as Exhibit 530 for  
11 identification and ask you to take a look at it.

12 A. Sure.

13 Q. I'll refer you to Page -- Page 3, 530-003.

14 A. This is my first semester fees.

15 Q. I'm sorry?

16 A. This is my first semester fees, thousand dollars.

17 Q. This is the check that you wrote that day?

18 A. Yes.

19 MR. RHYNE: Your Honor, we'd offer Exhibit 530 into  
20 evidence.

21 MR. BABCOCK: Actually -- no objection.

22 THE COURT: Exhibit 530 is admitted.

23 (Government's Exhibit 530 received in evidence.)

24 MR. RHYNE: Can we publish Exhibit 530, Page 3,  
25 please.



1 A. My friend.

2 Q. Oh. She was working there?

3 A. Yes.

4 Q. Okay.

5 A. She only -- only swiped the card.

6 Q. After you enrolled in these classes, did you ever receive  
7 any information about how to attend these classes?

8 A. No. I never attended any classes.

9 Q. Okay. Did you receive any direction --

10 A. Like --

11 Q. -- on how --

12 A. I used to receive some -- sorry.

13 Q. Did you receive any direction on how to attend these  
14 classes?

15 A. No.

16 Q. Did you ever inquire with Tri-Valley University about these  
17 classes?

18 A. Yes, a couple of times that I couldn't log in because I --  
19 I had to reset the password.

20 Q. So you made attempts to log into the classes?

21 A. Yes.

22 Q. Tell me what happened when you tried to log into the  
23 classes.

24 A. I -- they used to have, like, one link, but I never tried  
25 to log in.

1 Q. Okay. Were you ultimately able to talk to her?

2 A. Yes.

3 Q. Okay. Tell me about that conversation. What did Dr. Su  
4 say to you when you told her you wanted to transfer?

5 A. "I want to transfer out from this university."

6 Q. What did she say?

7 A. The same thing.

8 Q. Which was?

9 A. I have to pay the rest of the course fees if I have to  
10 transfer out.

11 Q. Okay. What did you do at that point?

12 A. I gave one check to her -- post-dated checks, same like  
13 before, and I came, and I cancelled that check.

14 Q. Why did you cancel that check?

15 A. At that point, I don't have money in my account. I don't  
16 know if she deposit, like, maybe before next day.

17 Q. Did you have any more contact with Tri-Valley University  
18 after that day?

19 A. No.

20 Q. When was the next time you discussed Tri-Valley University?

21 A. That is the last time I went.

22 Q. Did agents from Homeland Security come and talk to you --

23 A. Yes.

24 Q. -- after that?

25 Approximately how long after that?

1 A. Yes.

2 Q. Who trained you?

3 A. Susan.

4 Q. Did -- did Dr. Su train you on how to handle admissions  
5 into Tri-Valley University?

6 A. Yes.

7 Q. What instruction did she give you about admissions?

8 A. She gave verbal instruction like "Give admission to whoever  
9 asks for the admission in the e-mail" -- "in" -- "from e-mail.  
10 So anyone who wants to get admission in any field, either  
11 engineering or nursing or any field, you just give them  
12 admission."

13 Q. Now, Tri-Valley University required an applicant to send  
14 certain things when they applied; is that correct?

15 A. Yes, correct and not correct also because previously they  
16 say -- they say, "Check for any attachment." Okay? "Check for  
17 any attachment with the e-mail and still search for their  
18 diploma." But later on, they say, "No matter what the e-mail  
19 does, no matter what kind of attachment they send, just give  
20 them admission. Even if it's a picture with their puppy, just  
21 give them admission."

22 Q. Okay. Who told you that?

23 A. Yeah. Susan.

24 Q. Now, you said even if they give a picture of a puppy, give  
25 them admission?

1 A. She said, "You" -- "all you need to do is reply that all  
2 classes are online."

3 Q. Did she give you instruction on how to respond to students  
4 who were calling and saying, "My classes aren't working. What  
5 do I do?"

6 A. Send a reply like "We are working on it," maybe some words  
7 on some technical form. "We are working on it."

8 Q. Did she give you training on how to respond to student  
9 questions when they would call and say, "I can't log into my  
10 classes. I'm worried about my grades"?

11 A. Same reply. "Classes" -- "just" -- "just wait for some  
12 time. Classes are working, and we are working on grades."

13 Q. Did she give you instruction on how to respond to student  
14 inquiries about CPT?

15 A. Yes. She said --

16 Q. Can you -- what's CPT?

17 A. It's Complimentary Practical Training.

18 Q. What did she tell you to tell students who were asking  
19 about CPT?

20 A. So they ask -- she told me that if students want CPT,  
21 they're required to register their classes first. They need to  
22 give you -- give you class's name that they want to register  
23 and offer letter from employment, offer letter.

24 Q. Now, you mentioned earlier people would be admitted into  
25 various fields?

1 Q. What did she tell you about those?

2 A. Tuition payment -- she said -- she said all you need to --  
3 whenever e-mail came that student wants to pay the fee and  
4 student say, "These are the classes I want to enroll," all you  
5 need to do is take those credit card letters. There's one  
6 credit card machine. Swipe the credit card and some amount of  
7 money.

8 I don't -- if they say it's the first half -- they have an  
9 instrument system. So you might need to take the first half --  
10 swipe for the first half, or else -- if the student says, "I  
11 need to pay for the whole semester" -- so I take out the  
12 whole -- all the money and swipe the card for that.

13 Q. Would you ever process payments that were made on the  
14 phone?

15 A. Yes.

16 Q. How would you do that?

17 A. A student calls and says, "I" -- "I want to pay my fees.  
18 The" -- "and this is my credit card data. Can you do it right  
19 now?" And that's actually first priority when they call. They  
20 say we need to do that.

21 Q. First priority was to process the payment?

22 A. Yes. So anyone -- I mean, anytime they call it and do --  
23 want to do it on the phone, then we need to do it right away.  
24 It's not -- others -- we need to handle on --

25 Q. Who told you that?

1 A. Susan.

2 Q. Did Dr. Su give you instructions on creating transcripts?

3 A. Yes.

4 Q. What instructions did Dr. Su give you about transcripts at  
5 Tri-Valley University?

6 A. Transcript -- to create a transcript for any student, we  
7 need to do it -- we first need to know which classes he is  
8 currently enrolled. If -- if he already -- if they've already  
9 completed one folder in a laptop that -- if you already have  
10 that in our system, then just need to give them a grade: A, A,  
11 and A-minus.

12 Q. Did Dr. Su tell you why they needed an A, A, and A-minus?

13 A. She said, like, she don't want to give anyone a B. She  
14 don't want this student to get a B grade.

15 Q. Did she tell you why?

16 A. She said it doesn't look good. It should be A, A, or  
17 A-minus because sometime if you give all of them A, A, A, it  
18 doesn't look -- it looks like you made it up. So that's why  
19 she said A, A, and A-minus.

20 Q. I want to get back to the topic of student admissions.

21 Would you ever approach Dr. Su with questions about student  
22 applications?

23 A. Yes.

24 Q. How would she respond when you would go to her with  
25 questions?

1 A. I -- so when I first started, I asked her many questions  
2 like "Should we give them admission?" because I don't know  
3 anyone, and she's my first point of contact. And I said,  
4 "Should we give them admission?"

5 And she says, "Yes. Give them my admission and write  
6 admission letter and create an I-20."

7 And I asked -- sometimes asked, "Should we need to collect  
8 any application" -- "application file because that's what first  
9 they say. What is it? Application document?"

10 She'd say, "No, no need to do that. Just give them  
11 admission."

12 That's the answer. No matter -- no matter what, if they  
13 provide attachment, if they provide a diploma, if they provide,  
14 not provide -- if they say, "I need admission," give them  
15 admission.

16 Q. How would Dr. Su react when you would reapproach her with  
17 other questions?

18 A. She started actually yelling at us. She started yelling  
19 really loudly and in front of other people also, and she  
20 started -- "just give them admission. Just give them  
21 admission." She started yelling so loudly that clearly -- she  
22 said, "Don't ask any questions. Okay? Just give them  
23 admission."

24 Q. Did you take any steps to -- did you take any steps to  
25 where you could go to another source to have your questions

1 A. Well, I -- I mean, I edit few things in it.

2 Q. And this would be updated with new information; is that  
3 correct?

4 A. Yes, but actually I tried it once, and she didn't like it.  
5 So she again give it to me, and she didn't like it and said,  
6 "Stop doing that." That's what she told me.

7 Q. As you sit here today, do you recall any instance where  
8 Tri-Valley University denied admission to a student applicant?

9 A. I don't think so.

10 Q. I want to talk a little bit about SEVIS now.

11 Can you tell the jury how a person accesses SEVIS?

12 A. So when we -- whenever we go to Tri-Valley University, she  
13 give us laptop and open a SEVIS website and enter a password  
14 and give it to us.

15 Q. Who would enter the password?

16 A. She -- Susan.

17 Q. And then she would hand it to you when it was already  
18 logged in?

19 A. Yes.

20 Q. Are you familiar with the address 555 East El Camino Real?

21 A. Yes.

22 Q. How are you familiar with that address?

23 A. So that's the address she want us to put in new I-20.

24 Q. Who are you referring to?

25 A. Susan. Sorry.



1 Q. And she gave you that instruction?

2 A. Yeah, Susan gave me that instruction to enter that same  
3 address.

4 Q. Are you familiar with the term "designated school official"  
5 or DSO?

6 A. Yeah. I mean, I -- I know that.

7 Q. And how are you familiar with that term?

8 A. Actually, if I'm not wrong, it's in the I-20; right?

9 Q. Do you remember names of DSO's on I-20's?

10 A. I mean, I don't know whether they are DSO. I know a few  
11 names in the I-20. One is Wenchao Wang, and another is Sophie  
12 Su.

13 Q. Okay. When you would print I-20's from SEVIS --

14 A. Uh-huh.

15 Q. -- on a particular day under a particular SEVIS account,  
16 what would the DSO name be that came out?

17 A. Uh-huh. I mean, I don't know it's a DSO name, but I know  
18 it's on the right side, the bottom right side end. It's -- I  
19 mean, Wenchao Wang and Sophie Su and Susan Su, those three  
20 names. Whenever I print out, either of these three names shows  
21 that on this.

22 Q. As you print I-20's throughout the day, what would you do  
23 with that?

24 A. So that's the same assignment every day. Whatever I-20 you  
25 print out, you keep -- make a stack of it and at the end of the

1 day give it to Susan for signing it.

2 Q. You would take a stack of I-20's to her?

3 A. Yeah.

4 Q. What would Dr. Su do when she got the I-20's?

5 A. She'd start signing it -- signing all the I-20's, and after  
6 that, we need to post it.

7 Q. What would Dr. Su do if the I-20 was in the name of Wenchao  
8 Wang?

9 A. She signed it.

10 Q. Which name would she sign?

11 A. Wenchao Wang.

12 Q. What if the I-20 was in the name of Sophie Su? What name  
13 would she sign?

14 A. Yeah. She signed it in the name of Sophie Su also.

15 Q. How often would you see her do this?

16 A. I mean, it's daily. Whenever I work there, it's daily.

17 Q. During your employment at Tri-Valley University, did you  
18 ever learn of a referral program, student referral program?

19 A. Yes.

20 Q. Okay. What was that?

21 A. Actually, it's -- a referral program -- if you refer any  
22 students to Tri-Valley University, you get -- I don't remember  
23 the exact amount but something under \$2,000 as a referral fee.

24 Q. Did you ever refer a student to Tri-Valley University?

25 A. No.

1 while you were working at Tri-Valley University.

2 Did you ever see students come to attend physical classes?

3 A. No.

4 Q. Did you ever see students come in with backpacks going to  
5 sit down at a desk and watch a lecture?

6 A. No.

7 Q. Did students ever come to you and complain about the fact  
8 that there weren't classes?

9 A. I mean, in e-mail and on the phone, they complain  
10 sometimes. In an e-mail, they'll say, "There is no classes.  
11 We are there waiting for a professor, but nobody is there for a  
12 long time," on the phone also, but the answer is always the  
13 same.

14 Q. Whose answer was always the same?

15 A. Susan's answer is "We are working on the classes."

16 Q. Have you ever heard of ABS Consultancy?

17 A. Yes.

18 Q. How did you hear about it for the first time?

19 A. Actually, they never -- I mean, from e-mail the first time,  
20 I know it's a U.S. consultancy because they are referring  
21 students to Tri-Valley University, and I remember one guy from  
22 ABS came to Tri-Valley University, and Susan -- Susan  
23 introduced me to her -- him, and said, "This is a guy" -- "he's  
24 from this consultancy, and he needs help with all his students  
25 to register in classes."

1 What was your -- what were you trying to explain in your last  
2 answer --

3 A. So --

4 Q. -- about the lack of complaints?

5 A. -- in general -- if you say in general how many -- if I  
6 got -- in my daily phone calls, I got a hundred phone calls  
7 daily -- okay. In general, if you say how I'd characterize  
8 these hundred phone calls, I do get more complaints. I will  
9 say yes, 30 to 40 calls for -- regarding complaints about the  
10 classes.

11 But if you characterize those 30, 40 and get -- and try to  
12 get it right for different classes, okay. Then I will say for  
13 this class, I get less complaints. This class, I get more  
14 complaints, something like that. So that's how -- that's what  
15 my statement in -- that's what I give in the statement. In the  
16 statement, it says I have less complaints, but in general, I  
17 got a lot more complaints about the classes.

18 Q. So you got more complaints about certain classes?

19 A. No, many. That's what I'm saying. If you -- if you sum up  
20 all the classes complaints -- okay? -- it's a -- there are a  
21 lot of complaints if you just go through my call records. Out  
22 of hundred, that's 30 classes -- 30 complaints about the  
23 classes. That's all -- that's all I want to say.

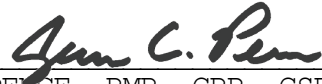
24 Q. How -- I don't understand, sir. Are you saying that  
25 that -- that gives context to your statement that very few

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CERTIFICATE OF OFFICIAL REPORTER

I, James C. Pence, Federal Official Realtime Court Reporter, in and for the United States District Court for the Northern District of California, do hereby certify that pursuant to Section 753, Title 28, United States Code that the foregoing is a true and correct transcript of the stenographically reported proceedings held in the above-entitled matter and that the transcript page format is in conformance with the regulations of the Judicial Conference of the United States.

Dated this 20th day of June, 2014.



JAMES C. PENCE, RMR, CRR, CSR NO. 13059  
FEDERAL OFFICIAL COURT REPORTER

Pages 1548 - 1710

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
BEFORE THE HONORABLE JON S. TIGAR

5	UNITED STATES OF AMERICA,	)	
		)	
6	Plaintiff,	)	
		)	
7	v.	)	NO. 11-CR-00288 JST
		)	
8	SUSAN XIAO-PING SU,	)	
		)	San Francisco, California
9	Defendant.	)	Tuesday
		)	March 18, 2014
10	_____	)	A.M. Session

**TRANSCRIPT OF PROCEEDINGS**  
**VOLUME 9**

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Reported by: Kelly Polvi, CSR, RMR, FCRR, Contract Reporter

## I N D E X

Tuesday, March 18, 2014

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(SWORN)

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**JASON MACKEY**

(PREVIOUSLY SWORN)

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## KUNDUR - DIRECT / RHYNE

1 Q. At the time you enrolled in the classes, did you have an  
2 expectation of whether they were going to be physical classes,  
3 with a classroom where you sit down, or online classes?

4 A. Obviously, it would be a physical classes because --

5 Q. Did you learn that to be the case? Were there physical  
6 classes?

7 A. No.

8 Q. What kinds of classes were offered to you?

9 A. After a couple of days, I went there, to the university,  
10 and one of the guys sitting in the class -- in the office gave  
11 me -- he said go online and register in this website, you'll  
12 have online classes.

13 Q. Did you try to do that?

14 A. Yes.

15 Q. What happened when you tried to register online for these  
16 classes?

17 A. Oh, one of the class was working and a couple of other  
18 classes were not working. And, in fact, I called a couple of  
19 times to the university to -- I was not able to log into that  
20 university -- to the website or --

21 Q. When you say you weren't able to log into the website, do  
22 you mean you weren't able to log in for the instruction?

23 A. Yes, that's --

24 Q. When you contacted the university to inform them of your  
25 difficulty in logging into these classes, what response did you

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Dated this 24th day of June, 2014.



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Kelly Lee Polvi  
CA CSR No. 6389  
Registered Merit Reporter  
Federal Certified Realtime Reporter.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
BEFORE THE HONORABLE JON S. TIGAR

UNITED STATES OF AMERICA, )  
 ) Volume 10  
Plaintiff, ) Pages 1711 - 1736  
 )  
VS. ) NO. 11-00288 JST  
 )  
SUSAN XIAO-PING SU, )  
 ) San Francisco, California  
Defendant. ) Tuesday, March 18, 2014  
 ) 2:03 p.m.

**TRANSCRIPT OF COURT PROCEEDINGS**

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**ATTORNEY AT LAW**

Reported By: James C. Pence, RMR, CRR, CSR No. 13059  
Official Court Reporter - U.S. District Court  
Computerized Transcription By Case CATalyst

1 least is as much for the Government's benefit as mine but  
2 partially for mine -- is to find out whether that's a final  
3 decision or whether over the course of the evening she might  
4 change her mind.

5 MR. BABCOCK: I think it's fine.

6 THE DEFENDANT: It's not.

7 MR. BABCOCK: Huh?

8 THE DEFENDANT: So now I'm -- I'm up to not -- not  
9 testifying.

10 THE COURT: We'll check with you in the morning.

11 MR. BABCOCK: I'm being as certain as I can, your  
12 Honor. I'm sorry.

13 THE COURT: I understand.

14 MR. BABCOCK: It's --

15 THE COURT: I -- I -- I won't inquire further  
16 anymore.

17 Anything else for today?

18 MS. WEST: Yes. One matter, your Honor, just to flag  
19 it for the Court. This may have been something we should have  
20 addressed earlier through a motion in limine, and the way it  
21 came in was sort of gradual. So at some point, it just seemed  
22 like we had missed the opportunity to object on it.

23 There were a lot of references, as I'm sure your Honor  
24 caught, particularly in the testimony of Agent Mackey to  
25 forfeiture. Forfeiture, as the Court knows, is part of

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Dated this 20th day of June, 2014.



JAMES C. PENCE, RMR, CRR, CSR NO. 13059  
FEDERAL OFFICIAL COURT REPORTER

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
BEFORE THE HONORABLE JON S. TIGAR

6	UNITED STATES OF AMERICA,	)	
7	Plaintiff,	)	
8	v.	)	NO. 11-CR-00288 JST
9	SUSAN XIAO-PING SU,	)	
10	Defendant.	)	San Francisco, California
11	_____	)	Wednesday
		)	March 19, 2014

TRANSCRIPT OF COURT PROCEEDINGS

VOLUME 11

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I N D E X

Wednesday, March 1, 2014

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1 (In the presence of the jury.)

2 **THE COURT:** Good morning. We're starting somewhat later  
3 than we normally do. You're a very punctual jury, and I  
4 appreciate that very much. And we've not had to delay you  
5 before this, and I apologize for that.

6 But I can say, with some high degree of confidence, that  
7 that will not have any effect on the estimate that I had  
8 previously given you, as I think you, yourself, will see a  
9 little bit later on this morning.

10 First of all, I should tell you that Exhibit 705B was  
11 admitted earlier this morning outside your presence. That is  
12 just related to some of the transactions that you heard  
13 testimony about from Agent Mackey yesterday. So that exhibit  
14 will also be available for you during your deliberations, if  
15 you want to see it.

16 With that having been said, would the Government like to  
17 call another witness?

18 **MR. RHYNE:** Your Honor, the Government rests.

19 **THE COURT:** Thank you, Mr. Rhyne.

20 Members of the jury, that concludes the presentation of  
21 the Government's case in chief.

22 **MR. BABCOCK:** Your Honor, could we have a quick side bar?

23 **THE COURT:** Yes.

24 (A sidebar was held as follows, out of the hearing of  
25 the jury.)

1  
2           **THE COURT:** We're at side bar outside of the hearing of  
3 the jury.

4           **MR. BABCOCK:** Your Honor, I'm making my Rule 29 motion at  
5 this point, judgment of acquittal on all counts. I understand  
6 the Court's going to defer a ruling on that. I assume it's  
7 still the Court's ruling.

8           **THE COURT:** Yes. As I indicated, anticipating you making  
9 this motion, the Court will reserve ruling on Defendant's Rule  
10 29 motion until after the jury has returned its verdict or  
11 until such other time as the Court may say.

12           **MR. BABCOCK:** Thank you.

13           **THE COURT:** Thank you.

14           **MR. RHYNE:** Thank you.

15           (The sidebar conference was concluded.)

16           (Proceedings heard in open court.)

17           **THE COURT:** Mr. Babcock, does the defendant wish to call  
18 a witness?

19           **MR. BABCOCK:** Your Honor, the defense also rests.

20           **THE COURT:** Thank you, Mr. Babcock.

21           Members of the jury, that completes the evidence in this  
22 case.

23           So if you were following along, I described the different  
24 stages to you. You know that all that's left is for me to  
25 instruct you in the law that you're to apply in case and then

1 while you were doing whatever you were doing, that person was  
2 standing on the street corner and they were not doing all the  
3 other things they could have been doing. And the reason for  
4 that is because you were late."

5 Now, he said, "I promise you one thing. Your time is not  
6 more valuable than my time."

7 So most people were not late to that class. That was a  
8 very effective way of making that point.

9 Dr. Su, your time is not more important than the time of  
10 the lawyers, the Court and the jury. I don't have a lot of  
11 choices. I don't have a lot of tools available to me to make  
12 this happen that you come to court on time. As I said before,  
13 I don't think it's asking very much of somebody in a trial to  
14 be on time, especially their trial. This is a condition of  
15 your release in this case, and I'll let Mr. Babcock explain to  
16 you -- if it needs to be explained with more clarity -- what  
17 that means. The Court's in recess.

18 **THE CLERK:** All rise. The Court is in recess.

19 (Recess taken from 12:22 P.M. to 12:36 P.M.)

20 (In the presence of the jury.)

21 **THE COURT:** All right. Back on the record. All the  
22 jurors are in their assigned seats.

23 Mr. Babcock, defendant's closing argument.

24 **MR. BABCOCK:** Thank you, Your Honor.

25 Good afternoon. I always get to close in the lunch hour

1 for some reason. I hope you got a little blood sugar left.

2 I have a different view, obviously, of this case. This  
3 case is weak. This case -- if you look at the evidence for  
4 each count, this case is weak.

5 They have to prove each of these counts beyond a  
6 reasonable doubt. And if it wasn't clear already, let me make  
7 it crystal clear now: If there's a single element for any of  
8 the crimes that they can't prove, then you have to find my  
9 client not guilty. They have to prove everything and they have  
10 to prove everything beyond a reasonable doubt. You can assume  
11 nothing. If they haven't proven it, then it doesn't exist,  
12 once you get back in the jury room. And they haven't proven  
13 these charges.

14 They've showed you a lot of documents and made a lot of  
15 insinuations, but what does it prove? I don't think any of  
16 these charges have been proven, and I'll go through them a  
17 little bit -- all of them, in more detail, to tell you why.

18 This case has not been proven beyond a reasonable doubt.  
19 Half the indictment -- more than half, actually, are fraud  
20 charges. Twelve counts of wire fraud, two counts of mail  
21 fraud, and then one count of conspiracy to commit visa fraud  
22 and four counts of visa fraud. Fraud. Fraud.

23 And the fraud that's charged, the fraud that they have to  
24 prove, is that my client, Dr. Susan Su, in 2008, came up with a  
25 scheme to defraud, a plan to defraud, foreign students. That

1 was her plan. That was her scheme. This whole school, this  
2 whole university that she started from scratch, by herself,  
3 that this was all just a big -- to use the word that we've  
4 heard a lot -- ruse. She never planned to have a school; it  
5 was a cover. It was really a scheme to defraud foreign  
6 students.

7 Have they proven that in the last two weeks of testimony?  
8 Is that what you heard? It's not what I've heard. I don't  
9 think they've proven it. And you, obviously, are the ones that  
10 have to decide.

11 Have they proven that for more than two years my client  
12 had a -- created this scheme to defraud? That it was all her  
13 idea? She was the mastermind?

14 Let's think about it a little from the beginning.  
15 Because where did she come from? You know a little about her  
16 background. She got her Ph.D. at Cal in engineering in some  
17 technical field I really don't understand.

18 If you look at the transcript, the transcripts are in  
19 evidence, all the courses she took. Did she take a single  
20 class in education? A single class in law? A single class in  
21 business administration or in public administration or anything  
22 that would be relevant to starting a school from scratch and to  
23 running a school after it's started? No. It's not there.

24 It's all MEMS, I think they called it. MEMS. Various  
25 engineering courses. That's her background. That's what she

1       taught at San Francisco State. That's what she knows how to  
2       do. She knows engineering, and she knows how to teach. She'd  
3       never run a school before. She'd never started a business.  
4       She'd never started a business from scratch.

5               And this isn't just some business down on the street  
6       corner where you open a store and start selling things.  
7       Starting a school is a complicated affair. You've got to come  
8       up with courses, you're going to have a curricula for the  
9       courses, you got to get students, you got to have facilities.  
10      And if you want to teach foreign students, you have to jump  
11      through all these hoops for the federal government.

12              And the Government's theory is that when she started this  
13      school back in the spring of 2008 her big plan, her big scheme,  
14      was all just a fraud.

15              'Cause she worked that first year. Let's be clear. She  
16      didn't -- she didn't have any students. She had none, at the  
17      start.

18              Did she have financing? She was doing this out of her  
19      own pocket. She was doing this out of her own heart. For all  
20      of 2008. She had to figure out how to incorporate a business,  
21      which she did. In the spring of 2008, she incorporated  
22      Tri-Valley University. And then she had to put together a  
23      catalogue and figure out what kind of classes were going to be  
24      offered.

25              And she had to find people, start finding people to teach

1 those classes.

2 She taught herself. You've heard that. There are  
3 classes that she's more than qualified to teach. But you heard  
4 she talked to other people, people -- find out if they'd be  
5 interested. She asked Professor Liou, from  
6 San Francisco State, whether he would agree to help out with  
7 this school. He said that he would. She asked some other  
8 people that she met in -- through her husband's work and in her  
9 field if they'd be interested, and they said that they would.

10 Did they all sign contracts and negotiate salaries and  
11 stuff like that? No. But she was taking -- she was starting a  
12 process. She was taking the steps. She did -- she did get  
13 this school off the ground. 1,700 students. From zero to  
14 1,700. 1,760 I guess. From zero to 1,700 in less than two  
15 years.

16 Well, that's not true. She already had some students  
17 before she got approval to admit foreign students. Not nearly,  
18 nearly so many. But she did have students.

19 But did she know she was going to grow from, whatever, a  
20 dozen students, to 1,700 students in less than two years? Was  
21 she prepared to manage that process? To deal with it? She  
22 wasn't.

23 You know, one of the interesting things about this case,  
24 they spent a long time investigating my client. More than six  
25 months, you heard. Eight months. From May 2010, before they

1 finally shut the school down in January 2011.

2 And they knew who all the students were. They just went  
3 in to SEVIS, typed in Tri-Valley University, and they got a  
4 list of all the enrolled students. 1,760 of them. And they  
5 went and they talked to most of them. You heard that. I think  
6 from Agent Mackey. They talked to around 900 students,  
7 something like that. 900 students.

8 And out of 900 students that they talked to, the best  
9 they could come up with was the eight students who testified.  
10 That's all they got?

11 Their very first witness, Vandana Virmani, she was  
12 already legally in the country. She didn't need a visa. Her  
13 husband had an H-1 visa. He was working here. She said she  
14 knew from the start, she knew exactly what she was getting  
15 into. She knew she was going to be taking on-line courses.  
16 That's what she expected. She never expected to get the class.  
17 You heard her say that. It's been two weeks. But that's what  
18 she said.

19 But she wasn't happy with it, she was having trouble  
20 logging in, and the material offered really wasn't that great,  
21 so she asked for her money back.

22 And did she get it? She asked for her money back, you  
23 remember, not until pretty far along into the semester. I  
24 think it was like five or six weeks, if I remember right. She  
25 ended up getting most of her money back. Not all of it. She



1 didn't ask right away.

2 But that's not fraud. Does that sound like fraud? You  
3 have to decide. This is the best they got. These eight  
4 students they put on from more than 1,700 potential witnesses,  
5 or 900, whichever pool you decide to compare it to. And these  
6 witnesses -- we'll get more to the witnesses later.

7 So what's the most important thing they have to prove for  
8 the fraud counts? They have to prove my client came up with a  
9 scheme to defraud.

10 Have they proven that? Well, after listening to  
11 Ms. West's opening, one of the main things they're relying on  
12 is the I-17 petition, the application for permission to be able  
13 to admit foreign students. And we've gone through that  
14 petition in great detail.

15 What didn't you hear? What do you know? You go to the  
16 website, you log in, and there's a form to fill out.

17 Do we know what kind of instructions Ms. Su was given?  
18 Dr. Su? Exactly what she was informed when she filled out the  
19 application? No. We don't.

20 Did anybody help her fill out the petition? There was no  
21 lawyers involved. This wasn't some big, fancy affair. This  
22 was her on her laptop at her house, sitting in bed or sitting  
23 on the couch, trying to fill out this form on this federal  
24 website.

25 Is it that complicated? It's not particularly

1 complicated. You want to check the boxes. What are you going  
2 to offer? Et cetera, et cetera.

3 And it's interesting to note. Nowhere on this form is  
4 there any sort of request for information, "How many students  
5 do you plan to admit? How much do you want to grow your  
6 school, if we let you admit foreign students?" Right?

7 She says question 22 -- this is Exhibit 1, the first  
8 document you saw in this case, how many -- "What's the average  
9 annual number of students?" Thirty. Thirty a year. That's  
10 not that many. She was starting small.

11 "What's your average annual number of teachers or  
12 instructors?" Nine.

13 Well, then, how many instructors are listed? A lot more  
14 than nine. I want to know, where's the fraud here? This is  
15 all given to the people at SEVP. The Student Exchange Visitor  
16 Program. They get all this stuff.

17 And then a guy comes out from the program, he's got this  
18 information, he looks at the site, he meets with Dr. Su, he  
19 asks her a bunch of questions. Why didn't we hear from him?  
20 Why didn't we hear from anybody at the Student Exchange Visitor  
21 Program who had one-on-one dealings with my client? These  
22 people still work there. That's what Ms. Warner said. Why not  
23 bring out the guy that came to the site and talked to her about  
24 the school, talked to her about what her plans were, talked to  
25 her about all this information, who looked at the facilities?

1 That's a reasonable doubt right there. Because their whole  
2 case rests on the I-17.

3 The Government's theory: My client already had a plan.  
4 She already had a scheme to defraud. And this was the first  
5 big step. Ms. West said it several times. Everything after  
6 this was obtained by fraud because the Government gave my  
7 client permission to admit foreign students based on this  
8 information.

9 But have they proven that? Have they proven that, when  
10 my client submitted this, there was a big scheme to defraud?  
11 Because it really boils down to what was my client's intent  
12 when she filled out this form in 2008. What was she planning  
13 to do. What was going through her head at that point.

14 Has the Government proven that? Their whole case rests  
15 on it, so why don't they bring out the people that have direct  
16 knowledge of it? And we know there's at least two, if not  
17 more, people that she dealt with at SEVIS in getting the  
18 petition approved.

19 There's the person that -- there's the person that came  
20 out, for one, for starters, that came out to the site and met  
21 with her, and then there's the person who ended up giving the  
22 approval down the road. And there's some communication back  
23 and forth in between.

24 The Government has to prove my client's intent when she  
25 submitted this form. Why haven't they put on the best evidence

1 of that? Why haven't they put on the witnesses who have  
2 firsthand knowledge, firsthand interaction with Dr. Su back in  
3 2008, witnesses who still work for the federal government,  
4 witnesses who could talk about what she was told about what the  
5 requirements are, what she knew, what she understood, what her  
6 plans were? They haven't done that.

7 You should find my client not guilty of all the fraud  
8 charges based on that alone. That is a reasonable doubt. The  
9 Government's failure to put on the most important firsthand  
10 witnesses in this case. Because it all goes back to 2008, all  
11 the fraud charges.

12 Instead, she called the head of the department, Susan  
13 Warner. She didn't have anything to do with processing my  
14 client's application. That's not even her job. She didn't  
15 even work for the department back then. She was a private  
16 contractor for the Department of Homeland Security.

17 What does she know about Dr. Su? She doesn't know  
18 anything. She doesn't have any information about what my  
19 client was told, about what my client understood.

20 You should acquit my client on the first 14 counts based  
21 on that fact alone. That is a reasonable doubt.

22 Now, years later, the Government, they sure have a lot of  
23 quibbles with exactly what was submitted here. They haven't  
24 even answered all the questions. These documents raise serious  
25 questions. Why, for example, we know -- we were told that this

1 form is submitted electronically, Exhibit 1. That you fill it  
2 out online and then it uploads somewhere in a computer in  
3 Washington, DC.

4           Though I'm curious. Because if you look at it in  
5 Exhibit 1, down at page 2, it's got that received stamp. That  
6 received stamp that, according to Ms. Warner, means it was  
7 mailed. Received in the mail room. That's a reason to doubt  
8 whether this is a wire fraud at all. It says it was received  
9 by mail. This is charged as Count 1. This document.

10           And why -- we know there was more communication. It  
11 wasn't just her submitting this, my client submitting. It  
12 wasn't my client just submitting this form online and then  
13 waiting for the approval.

14           She had some interaction with the people at SEVIS, she  
15 writes this letter on December 11th, "Dear Ms. Deuell, I'm  
16 writing you in response to your email," she gives copies of her  
17 sister and -- sister and brother-in-law's passports and some  
18 information about the accreditation in California, and says her  
19 sister and brother-in-law had taken the web course. That's all  
20 the government asks for.

21           And this, you'll remember, is after the site review. The  
22 gentleman had already come out and met with Dr. Su at the  
23 school at the site and looked at it and had his questions  
24 answered. And this is the only follow-up they asked for.

25           These documents raise more questions than they answer.

1 This is page 2 of Exhibit 3. Once again, this is the first  
2 page of I-17. You'll remember Ms. Warner identified the  
3 signature there of the gentleman at SEVIS who approved the  
4 petition. That's his signature. It was approved on  
5 February 17th. There's that same mail stamp; right? This does  
6 look like a copy that was mailed later.

7 What I don't understand is why the one that was  
8 supposedly submitted online is also stamped like it was mailed.

9 But you remember there's some different versions of this  
10 document. There's that version in Exhibit 3 and then there's  
11 -- I'll put it side by side -- nearly, but not exactly, the  
12 same document in Exhibit 7. Page 1 of Exhibit 7. Looks like  
13 the same handwriting; it is the same signature. I asked  
14 Ms. Warner that. That's the same fellow at SEVIS who looked at  
15 these and signed them. It's the same date.

16 But if you look at it, the one's not just a -- I'm doing  
17 this all wrong. The one's not just a copy of the other; right?  
18 I mean, the handwriting's similar but it's not the same. There  
19 were at least -- there were at least two of these at the  
20 office, and they say different things.

21 One says, at the bottom, the articulation agreements are  
22 acceptable, and the other does not. Then the other says  
23 private school of higher education only approved for classes  
24 listed in Section 19.

25 And those are the classes. Those are the classes that

1 Dr. Su was qualified to teach and that Dr. Liou, Professor Liou  
2 of San Francisco State, approved. You'll remember, in the  
3 articulation agreement, that he did sign.

4 These documents, to me -- and you have to decide, they  
5 raise some real doubts. What exactly happened here? What  
6 exactly happened at SEVIS between SEVIS and my client? Because  
7 they, they have the burden of proof here. I don't have to  
8 explain these doubts. They have the burden of showing that  
9 there's no doubt here exactly what happened has been proven  
10 beyond a reasonable doubt. I don't think it has.

11 And there's a simple way to clear it up. Call Mr. Cody.  
12 Put him on the stand. And he could tell you, "This is what  
13 happened. This is why there's different ones of these dated  
14 the same day. This is what I told Dr. Su."

15 Why is this important? It's important for two reasons.  
16 Because it all comes down to my client's intent.

17 And this is the best evidence. Exhibit 1 is the best  
18 evidence of what my client understood back in 2008 when she  
19 first asked for permission to teach foreign students.

20 And to follow up a little on that point, I mentioned  
21 earlier about my client's education. It's no question, you  
22 know, where her training is. It's in engineering. And if you  
23 look at some of the documents that she did write, for example,  
24 one we saw yesterday, I think it was Exhibit 800, my client's  
25 claiming it's the Government.

1           You can look at the way it's written and decide for  
2 yourself what her level of sophistication was in these matters.  
3 What her real ability to deal with these things was. This  
4 was -- strike that.

5           The Government has so many quibbles about this I-17.  
6 What else do they allege that proves that she had a scheme to  
7 defraud, she made up a scheme to defraud? Well, they say she  
8 didn't have physical classes. She just had online classes. At  
9 times they seem to say there were no classes, but we know  
10 that's not true.

11           Mr. Kundur yesterday, one of the last witnesses,  
12 testified he had some difficulty logging into everything, but  
13 he did -- the classes he was able to log into he did attend,  
14 and that it was a virtual class. That there was a professor  
15 there, there was instructions, there was testing. He said that  
16 the attendance was taken.

17           This is their witness. Their witness confirming that  
18 there were virtual classes here. This wasn't just some sham.  
19 Were there logistic difficulties? Absolutely. You'll notice  
20 most of their witness -- most of the testimony all relates to  
21 2010. They don't focus back at the start, when it was small,  
22 before she had any foreign students, what the classes were like  
23 then. It's just later, when there's a lot of people trying to  
24 log in.

25           She was dealing with it the best she could, but obviously



1 it wasn't quite up to speed.

2 But that's not proof of an intent to defraud. If she was  
3 trying, if she was trying, then they haven't proven their case.

4 And she was trying to make it better. She didn't stay in  
5 that original small building; she did get a bigger building.  
6 She did invest in growing the school to meet the needs of the  
7 growing students.

8 The Government focused a lot on -- at least in the first  
9 week, about these articulation agreements. Looking at the  
10 different documents that were written at SEVIS about those, I  
11 don't see how you can find that anything has been proven beyond  
12 a reasonable doubt.

13 But there's -- let's be clear, there's not even -- there  
14 were three articulation agreements, one of them there's no  
15 question was legitimate. There's been no evidence and no claim  
16 that the third articulation wasn't valid. Their quibble is  
17 with two.

18 Once again, Central Florida University articulation  
19 agreement. Whose signature was on there? My client's  
20 brother's. He was a professor at that university.

21 Did the Government call him to say she didn't have my  
22 authority to use my signature? No. They called the head of  
23 the department who didn't have anything to do with this.

24 All he can testify to is general practice and general  
25 procedure. He didn't say exactly what Professor Su, the other

1 Professor Su was told, what his understanding was, whether he  
2 knew or not he had the authority to do this.

3 What about Professor Liou from San Francisco State?  
4 Because he admitted. He said, "Yeah, I signed one of these  
5 articulation agreements. I knew Dr. Su. I agreed to help her  
6 out with the school." He says, "I sent an e-signature from  
7 China because I was spending a lot of time in China." He said,  
8 "I didn't sign the second one." And the second one is just the  
9 e-signature from the first one.

10 Well, Professor Liou had been very helpful with my  
11 client.

12 And you remember, there was a third professor involved,  
13 Professor Hu. When my client was interviewed by Agent Mackey  
14 back in January 2011 for six hours, there was another professor  
15 at San Francisco State involved, Professor Hu, and the  
16 Government didn't put him on either.

17 I keep saying this because the burden always stays with  
18 the Government. I don't have to prove a thing. Dr. Su doesn't  
19 have to prove a thing.

20 When you got on this jury, I asked every single one of  
21 you if you get on this jury will you hold the Government to its  
22 burden of proof. Because that's the job here. That's the job.  
23 It's more of an analytic -- objective analytic procedure. It's  
24 nothing against Mr. Rhyne and Ms. West. The question is, what  
25 have they proven. Have they proven these charges beyond a

1 reasonable doubt.

2 What else does the Government have to prove? On the  
3 fraud charges, they have to prove materiality. They have to  
4 prove basically that these were important. That any, any  
5 falsehoods or discrepancies were significant, they were  
6 material. Was this Stanford University? No. It was a  
7 small -- very small, originally -- school in Pleasanton.

8 And we heard some complaints about, "I thought it was  
9 going to be a better school. I thought there were going to be  
10 physical classes." But you know what? Sometimes you get what  
11 you pay for. That doesn't mean it's fraud, okay?

12 All these students looked around at more than one school,  
13 not just TVU. I asked all the students who testified about the  
14 fees. And you'll remember every one of them said TVU was the  
15 cheapest. It was cheaper than that school down in  
16 Santa Clara. ITU. It was cheaper than all the other schools  
17 we heard about.

18 And there were several. That's one of the reasons they  
19 chose this school. Because it was cheaper.

20 So they knew they weren't going -- they knew. They knew  
21 they weren't going to be getting everything that they would  
22 want, would expect at a school where they're paying 15-,  
23 \$20,000 a semester. They were paying 2,700 bucks, and they  
24 didn't even have to pay it up front; they were allowed to pay  
25 it in installments.

1           And the Government keeps saying this case was about  
2           greed. That's what they said in their opening statement. This  
3           case is about greed. Well, the tuition didn't sound very  
4           greedy and the collections didn't either.

5           We heard some of these students, they didn't even -- they  
6           didn't even pay off their tuition. They'd make the first  
7           thousand dollars' installment and that was it.

8           And Mr. Patel, who worked there for about a month and a  
9           half in 2010, Parth Patel, who was there daily, saw Dr. Su  
10          daily, saw how this operation was conducted, and when he was --  
11          he was interviewed by the agents, what did he say? He said, "I  
12          didn't think Dr. Su did it for the money." He didn't want to  
13          admit that for me on the stand; remember? We had quite a  
14          struggle with that. But when it was just him and the agents  
15          and not me confronting him in the court, he said, "This wasn't  
16          about the money."

17          I'm not making this up. This is -- this is the best  
18          witnesses they had out of 1,700 students. Their own witnesses  
19          told them this was not about the money. What else do they have  
20          to prove? All these wire charges. All these wire fraud  
21          charges. They have to prove that the wiring itself, that the  
22          defendant used or caused to be used the wires to carry out or  
23          attempt to carry out an essential part of the scheme.

24          So you're going to have to go through all these wires one  
25          by one and ask yourself, "Was this an essential part?" And if

1 you have any doubt, if you have a reasonable doubt -- not any  
2 doubt, but if you have a reasonable doubt, then you have to  
3 find my client not guilty.

4 The I-17. Well, if there was a scheme you'd have to  
5 decide whether that -- you'd also have to decide whether it's  
6 material. We already talked about that. Was I-17 an essential  
7 part? I guess that it was. The school would never have gotten  
8 the permission to admit foreign students without it.

9 What about this email in Count 2? Email. Mr. Barghav in  
10 India, saying, "I got F-1 approval; I'd like to start getting  
11 some foreign students. Can you help me out?"

12 Is that -- she showed you that email. Was that email  
13 essential to this alleged scheme? How would any of these, how  
14 would any of these alleged wirings further the scheme? Because  
15 almost all of them, all of them, have to do with what the  
16 agents did. Except for those first two. Those are the only  
17 two that Dr. Su did on her own. The rest of them were all  
18 created by the agents asking her to -- asking her to admit  
19 students. Asking her to email things. These are things  
20 created by the agents. They weren't part of the school's --  
21 some sort of scheme at the school.

22 But you're going to have to go through them. Most of  
23 them, Counts 3 through -- well, I guess one, one was an agent  
24 undercover, but the rest of these relate to people that didn't  
25 exist or hadn't really applied to this school. Were those

1 essential to anything? Let's talk a little about these, these  
2 ruse operations. Because the Government spent a lot of time  
3 and a lot of energy on it. Because you remember in May 2010 my  
4 client found out that Anjiray Dirisanala ended up basically  
5 stealing from the school. And he made something like \$20,000.  
6 And she told him not to come back. Oh, I'm sorry, it was a  
7 different reason. She learned that a student's credit card had  
8 been used outside of the school, so she assumed it was somebody  
9 working in the office and she reported it to Pleasanton police  
10 and she told Anji to take a break while it was being  
11 investigated. At that point he goes to Immigration. His  
12 friend Ron Krishna Karra takes him there, introduces him to  
13 Agent Mackey, and they begin an investigation.

14 And what do they do? They just come out and talk to her,  
15 say, "We want to look into your school more. Can we see a  
16 little more of what's going on?" No. They start an  
17 eight-month investigation and end up shutting the whole thing  
18 down. Most of the counts of the indictment, almost all of  
19 them, have to do with these ruse operations. They sent them in  
20 and said, "Try to enroll Mr. Agrawat," who doesn't even exist.  
21 "Try to enroll Mohammed Rizwan," who doesn't even exist. And  
22 does he do it? Do they get enrolled? They do.

23 But my client doesn't know that these people aren't  
24 actually enrolling. You remember he goes in and he says, "I've  
25 got some friends. I want to enroll some friends." How is that

1 evidence of my client's intent to defraud? Did she go and  
2 check for every transcript right away, check their prior  
3 degrees? No.

4 But you know what? All these students, they all had  
5 degrees. Every one of them had at least a Bachelor's. One of  
6 them already had an MBA. I forget who it was. Maybe  
7 Mr. Ignatius.

8 These students were legitimately qualified to be  
9 students. There's no question about that. You heard that they  
10 were supposed to get prior degrees and transcripts. But did  
11 they always do it? Apparently not. That doesn't make it a  
12 fraud. These people were legitimately students, at least as  
13 far as my client knew, and that's what counts. That's what  
14 counts on all the fraud charges. What about the visa fraud?  
15 Let's strike that. Before we get there, there's the conspiracy  
16 to commit visa fraud. What do you have to find? You have to  
17 find the Government proved beyond a reasonable doubt that there  
18 was an agreement between my client and other members of a  
19 conspiracy to commit visa fraud. There was an agreement.

20 Where is the proof of that? Anybody get up there and say  
21 "Yeah, Dr. Su came to me, she said -- she said, 'I want to make  
22 a deal with you. We're going to admit all these foreign  
23 students, even though they're not qualified, or even though  
24 they don't have all the necessary paperwork?'" No, nobody said  
25 that. They haven't proven that. Did they prove that she

1 worked with some people? Sure. People that worked in the  
2 office, Anjiray Dirisanala, Parth Patel. But just employing  
3 them does not make them co-conspirators. You have to find,  
4 beyond a reasonable doubt, that there was an agreement to  
5 commit visa fraud. That there was a plan.

6 And what is the visa fraud? All the visa fraud -- they  
7 haven't charged, by the way, any of the actual students as visa  
8 fraud counts; right? Because these people were lawfully in the  
9 country. They have to prove that my client forged or falsely  
10 made a document, and the documents they're relying on for each  
11 of these counts -- this is 16, 17, 18, and 19, is an I-20, an  
12 I-20. That these were forged.

13 Were they forged? No. The Government hasn't proven  
14 that. Were there -- did my client sign in her sister's name?  
15 Absolutely. Did she sign her brother-in-law's name?  
16 Absolutely. That doesn't make it a forgery. It's not a  
17 forgery if you have someone's permission. Secretaries sign for  
18 their boss. Husband's and wives sign for each other. That  
19 doesn't make it a forgery.

20 It's a forgery if you sign someone's name without their  
21 authorization. Does this prove that my client did not have  
22 authorization to sign Sophie Su, to sign Vince Wang? No. They  
23 haven't even tried to prove it. They want you to assume it.  
24 They didn't put on a single witness to say, "Dr. Su did not  
25 have permission to sign her sister's name." And without that



1 evidence, you can't assume that she didn't have authorization.

2 And the same is true of her brother-in-law. They have to  
3 prove it. Have they proven that? There wasn't a single shred  
4 of evidence on it. They just want you to assume that because  
5 she signed someone's else's name, that's a forgery. But what  
6 they really want you to assume is she didn't have  
7 authorization. They also have to prove -- or they could prove  
8 it in the alternative instead of proving that it was forged.  
9 They could say that it was falsely made.

10 All of these I-20s, as far as my client knew, were for  
11 real people. There's no claim that anyone was admitted under a  
12 phony name, anyone was using anyone else's name; right?

13 There's a lot of quibble about, "Well, they used the same  
14 address and they used the same income." But does that really  
15 matter?

16 I asked, you know, Dr. Warner about it. What's this  
17 address for? We actually -- we went over the regulations.  
18 Immigration wants an address. If you're a student in the  
19 United States, they want an address to contact you.

20 Is there any evidence that anybody ever tried or actually  
21 needed to contact one of the foreign students at these  
22 addresses? No. Does the address really matter? No. Does  
23 income really matter? I guess you should ask. I mean, do they  
24 really check up on it? Did any agents ever say, "Yeah, I went  
25 to any of these students at Tri-Valley University and I checked

1 on their income and it wasn't what it said it was on their  
2 I-20"? No. None of that really matters.

3 Okay. The next count is the giving a false document to a  
4 government agent. In this case we're talking about on  
5 September 24th, during one of the ruse operations, which was  
6 the email to Agent Taylor for the fictitious person, Dirikani,  
7 who was the foreign student.

8 Have they proved that my client knew that that document  
9 was false? Have they proved that she knew that this wasn't  
10 really a student? Because you remember there was -- of these  
11 phony names that were given to TVU, they actually used --  
12 picked a name that happened to coincide -- it was back-flipped,  
13 but coincided with a real student. They used the name Mohammed  
14 Rizwan, but it turns out there either was a student named  
15 Rizwan Mohammed or Rizwana Mohammed.

16 And even the agent -- sorry, even Anji Dirisanala, when  
17 he went there, was confused about the first and last name and  
18 he had to go out and ask the agent to figure it out himself.  
19 He went into TVU, he wasn't sure what the first name was, he  
20 wasn't sure what the last name was.

21 Count 20, you also have to find that this email to Agent  
22 Taylor was material. That it was material to the Homeland  
23 Security. I don't think they've proven that.

24 The alien harboring counts also relate to Anjiray  
25 Dirisanala, as well as Vishal Dasa. If you look at the

1 elements, that should be an easy not guilty. They say my  
2 client harbored, concealed or shielded Vishal Dasa? Their  
3 theory is that by giving him a job she was harboring him in  
4 that she was concealing him from Immigration? I don't even get  
5 that. They also have to prove that he was not -- that she knew  
6 he was not lawfully in the country. Well, that's not what he  
7 testified to. That's not what either of them testified to.  
8 They were both lawfully admitted to go to other schools, and  
9 that her purpose was to help him avoid detection by the  
10 Immigration authorities.

11 Where is the evidence of that? They didn't present any  
12 facts on that.

13 I'll note that the end of the instruction -- and this is  
14 Instruction 54, which defines the alien harboring -- an alien's  
15 not lawfully in this country if the person was not duly  
16 admitted by an Immigration officer.

17 Neither of them said that. Neither of them said they  
18 snuck into the country or anything like that. There's just no  
19 evidence on that. You have to find her not guilty on those  
20 charges. That's Counts 22 and 24. Neither of them ever said  
21 that they told her that they were here illegally.

22 What about the unlawful access charges -- charge, which  
23 is Count 25? They say my client didn't have the authority to  
24 access SEVIS. Well, she did have the authority. They gave her  
25 the authority to access SEVIS. So they talked a little bit and

1 said, "Well she aided somebody else. She aided and abetted  
2 somebody else in unlawfully accessing SEVIS." That's the  
3 people that work in the office. But that's not what they said.  
4 They said she would log in and she took steps, she was careful,  
5 so that the staff didn't see the log-in information. She  
6 wasn't sharing the log-in information. She didn't let the  
7 staff use the computer until she completed the log in. That's  
8 the accessing. There's -- nobody said that they were ever able  
9 to log into SEVIS because Dr. Su gave them the information or  
10 showed them how to do it.

11 We're almost through this. Bear with me. I hate the  
12 lunch-hour closing.

13 Last group of counts is the money laundering. Why should  
14 my client be found not guilty of that? Because they haven't  
15 proven beyond a reasonable doubt that she knew these were  
16 criminally-derived proceeds. They have to prove that. They  
17 have to prove that she knew it. Criminally-derived property,  
18 sorry. Not proceeds.

19 What's the best evidence? What's the best evidence at  
20 trial that she didn't think that? She didn't -- she did  
21 everything in her name, in the school's name. She didn't try  
22 to hide any of this. She wrote checks on the school account,  
23 she drew money from the school account. She didn't transfer it  
24 to some -- some unknown bank or to some third party. She  
25 bought a car. She bought property for the school. She bought

1 herself a house. She did it all in her own name.

2 Does that sound like somebody who knew that they were  
3 using criminally-derived property? No. Just the opposite. It  
4 sounds like somebody who doesn't think they're doing anything  
5 wrong.

6 And this sounds hyper-technical, and it is, but the  
7 Government still has to prove it. They have to prove this was  
8 in or affecting commerce. Look at the jury instruction. They  
9 have to prove each of these checks and these transfers from the  
10 bank that she did, that they charged with money laundering,  
11 affected commerce. There was no testimony on that. They  
12 didn't put on some economist or any other sort of expert. They  
13 put on bank records, I guess, that Wells Fargo was federally  
14 insured, but these were all local. These were all local. It  
15 was all out in Pleasanton and Livermore.

16 Okay, this is my last chance to talk to you. Ms. West  
17 gets a chance to get up again. There's been a lot of testimony  
18 and there's certainly a lot of documents and I certainly  
19 haven't covered them all, so I just ask you, when you get back  
20 there and start deliberating, the question comes up and it's  
21 something I haven't talked about, just take a second to say,  
22 "Well, is there another side to this? What would Mr. Babcock  
23 have said?" Try to look at it from both ways.

24 When you get back there, this is totally up to you. You  
25 have to deliberate. You got to talk to each other. That's all

1 it means. It's a fancy word to talk to each other. You  
2 finally get to talk to each other about the case. Consider  
3 each other's views, but when it comes time to vote, it's not a  
4 group decision. It's not a majority rule. It's not a  
5 go-along-with-the-group thing. Everybody's got to decide their  
6 own vote. There are reasons -- each of these counts, there are  
7 reasons to doubt whether these charges are true. One of the  
8 biggest reasons, from where I'm sitting there really wasn't a  
9 single unbiased witness in this case. All of these students  
10 are from another country. All of them were here either on an  
11 F-1 or another type of visa. On January 19th several of them,  
12 like my client, were woken up, 6:00, 6:30 in the morning, with  
13 Immigration agents at their door. Some of them were arrested  
14 and deportation proceedings were started, or at least they had  
15 to go to Immigration court.

16 Were they scared? Absolutely. Naturally. They're all  
17 concerned about their immigration status. About staying here.  
18 And the only reason -- well, I guess I didn't ask all of them,  
19 I didn't ask them if they wanted to stay here, but I think it's  
20 mostly self-evident. All of these witnesses had a reason to  
21 slant their testimony in favor of the government. I'm not  
22 saying they made all this stuff up, they didn't, but it  
23 definitely colored their testimony.

24 Remember when I was asking Mr. Patel, I was trying to ask  
25 him about these things, he told the agents last year and a

1 couple of years ago. And he kept denying it. He kept denying  
2 it. He says, "I didn't say that." Or, "I don't remember  
3 saying that." And as soon as Mr. Rhyne gets up on redirect,  
4 he's got -- the answers are flowing again. It's like pulling  
5 teeth, when I was asking him questions. Because they are  
6 afraid of Immigration, they are afraid of the Government. And  
7 I understand that. It's nothing personal. But you got to take  
8 that into consideration. Thank you for your time. I thank you  
9 for it, my client thanks you for it. I just ask you to take it  
10 seriously and really look at the evidence because I don't think  
11 it's there. Out of these thousands of students, they  
12 cherry-picked a few and they still haven't proven it. Thank  
13 you for your time.

14 **THE COURT:** Thank you, Mr. Babcock.

15 May I see counsel at sidebar, please.

16 **MS. WEST:** Yes.

17 (A sidebar was held as follows, out of the hearing of  
18 the jury.)

19 **THE COURT:** We're at sidebar outside of the hearing of  
20 the jury. Ms. West, do you want the proceedings to continue  
21 today so you can make your rebuttal closing argument? And how  
22 long do you think that will take, if you do?

23 **MS. WEST:** I would like to do that. I think it could be  
24 done in 15 minutes or less.

25 **THE COURT:** All right, then let's proceed. And that way

CERTIFICATE OF CONTRACT REPORTER

I, Kelly Lee Polvi, certify that pursuant to Section 753, Title 28, United States Code, that the foregoing is a true and correct transcript of the stenographically-reported proceedings held in the above-entitled matter and that the transcript format is in conformance with the regulations of the Judicial Conference of the United States.

Dated this 26th day of June, 2014.



---

Kelly Lee Polvi  
CA CSR No. 6389  
Registered Merit Reporter  
Federal Certified Realtime Reporter



# Witness Email

#1

**Rhyne, Wade (USACAN)**

---

**From:** Rhyne, Wade (USACAN)  
**Sent:** Thursday, February 27, 2014 11:32 AM  
**To:** Erik Babcock (erik@babcocklawoffice.com)  
**Cc:** West, Hartley (USACAN) (HWest@usa.doj.gov)  
**Subject:** Witness email #1  
**Attachments:** AH1-Alien Harboring-Vishal.pdf

Erik-

To follow up on our voicemail, attached below is an email that Vishal Dasa received earlier this week.

Wade and Hartley

----- Forwarded message -----

**From:** Dacey Dayle <dacey2012@gmail.com>  
**Date:** Tue, Feb 25, 2014 at 8:07 PM  
**Subject:**  
**To:** [dasavishal@gmail.com](mailto:dasavishal@gmail.com)

We have your class attendance record, and will prove ur legal status in court Do not be intimidated by the gov and lied. Look at what they did to Anji Reddy, they used him as a decoy, and right after they arrest him. only if we can prove your legal status, all you did was just administrative mistakes, not a big deal. that you can stay in US and reduce the sentence..

do not be afraid to tell all the truth ..

(See attached file: AH1-Alien Harboring-Vishal.pdf)

# Witness Email

## #2

**Rhyne, Wade (USACAN)**

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**From:** Rhyne, Wade (USACAN)  
**Sent:** Thursday, February 27, 2014 11:36 AM  
**To:** Erik Babcock (erik@babcocklawoffice.com)  
**Cc:** West, Hartley (USACAN) (HWest@usa.doj.gov)  
**Subject:** Witness email #2  
**Attachments:** ATT00001.htm

Erik-

Here is the other email that one of our witnesses received.

Wade and Hartley

-----Original Message-----

**From:** S. M. Ahmed [[smajuly@yahoo.com](mailto:smajuly@yahoo.com)]  
**Sent:** Wednesday, February 26, 2014 11:52 AM Eastern Standard Time  
**To:** Dept Homeland Security  
**Subject:** Fwd:

GM! Sir

I've got this mail yesterday forwarding you as it is.

Thanks,  
Syed M Ahmed.

Sent from my iPhone

Begin forwarded message:

**From:** Dacey Dayle <[dacey2012@gmail.com](mailto:dacey2012@gmail.com)>  
**Date:** February 25, 2014 at 7:55:03 PM PST  
**To:** [smajuly@yahoo.com](mailto:smajuly@yahoo.com)

Syed Masood was the husband of Kalpana Challa. He transferred to TVU to study the Pharm.D. program in Spring 2010. He paid \$2700 in Spring 2010 and registered three courses. In Spring, He earned two course grades in Spring 2010 : CS319 and CS302. Both "B+". He audited and learned, attend class-meeting for two more classes for Spring 2010, CS 315 Software Testing & Quality Engineering, and CS323 Oracle Programming, but did not earn a grade. He was approved for CPT in Summer 2010 while took a summer break. During Break, he also audited and studied three more TVU course in the Summer for free to learn the course content to open a Paris TVU office (Dream Weaver II; BA356 International Business Management and International Marketing. He earn a "B+ " in CS 302 Operating System in Spring 2010 already. But a later trimester, Summer 2010 another instructor gave him a "F" due to not participation (because he already had a "B+" grade). In Fall 2010, he paid \$500 in Fall and registered three more courses and he also earn one course grade in Fall 2010. He never requested a transfer out, he was still

referred friend to TVU in Nov 2010. The President has made it mandatory to all TVU students to attend class meeting, which count to 10% of class grade. Student also received E-mails from professors to attend classes. He did attend lots of the classes. He and his wife talked to Ms Su about an E-mail Ram Karra sent to TVU students to tear TVU down. He and his wife Kalpana Challa also tried to open Paris TVU office. Student is actively pursuing his graduate study and is in status.

The transcript is just a record to keep what course you took each term. Your grade is from your TVU account input by the instructor.

DO not be afraid, and do not lie, Ms Su never tell anyone about on-campus classes, she always said you can come to campus for classes and/or attend the class at home or work, you will see the same as here.

# Witness Email

## #3

**Rhyne, Wade (USACAN)**

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**From:** Rhyne, Wade (USACAN)  
**Sent:** Saturday, March 01, 2014 4:27 PM  
**To:** Erik Babcock (erik@babcocklawoffice.com)  
**Cc:** West, Hartley (USACAN) (HWest@usa.doj.gov); Jason Mackey (jason.mackey1@dhs.gov)  
**Subject:** Witness email #3  
**Attachments:** VD.docx; ATT00001.htm; Message History-Pinky.pdf; ATT00002.htm

Erik-

Below, please find a third email from "Dacey Dale" to a government witness, with attachments.

Wade

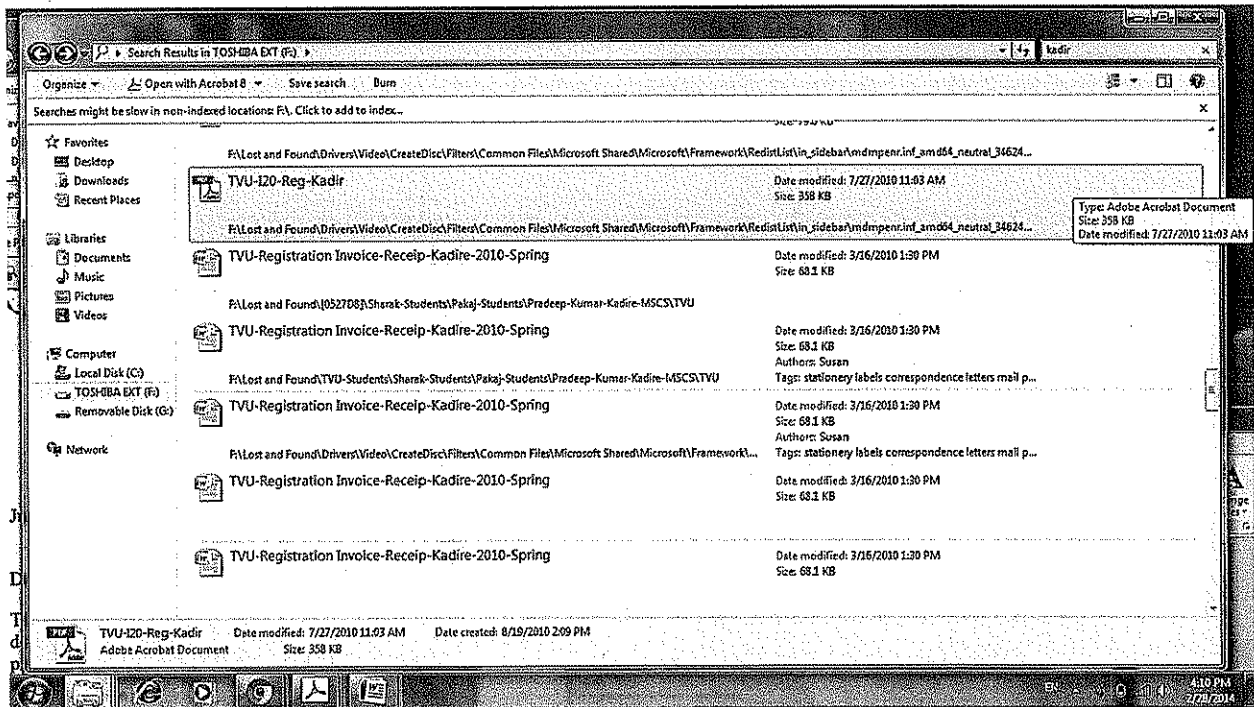
----- Forwarded message -----

**From:** Dacey Dayle <[dacey2012@gmail.com](mailto:dacey2012@gmail.com)>  
**Date:** Sat, Mar 1, 2014 at 3:20 PM  
**Subject:**  
**To:** D V <[dasavishal@gmail.com](mailto:dasavishal@gmail.com)>

Important files... - VD.docx - Message History-Pinky.pdf

The Attorney will question you about that you contingently admitted these two students (they need submit the rest of package later), and also provided the verification files of these two students for Ms Su when they were pretended that they were stuck at JFK airport --- You did the right thing for verification, since these two students are in classes and also receiving TVU's E-mail for class meeting ( attached one sample) which you can see from the TVU site. They were admitted late in Summer, they have one more term to complete their study and earn a grade. They are in the process of studying. You did the right thing, except for a couple of typos. Need to tell truth here!

(All files are found at HP notebook. Just One Smapple, )



(All files are found at HP notebook)



# Witness Email

#4

**Rhyne, Wade (USACAN)**

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**From:** Rhyne, Wade (USACAN)  
**Sent:** Tuesday, March 04, 2014 3:45 PM  
**To:** Erik Babcock (erik@babcocklawoffice.com)  
**Cc:** Jason Mackey (jason.mackey1@dhs.gov); West, Hartley (USACAN) (HWest@usa.doj.gov)  
**Subject:** FW: Dear Prof. Liou  
**Attachments:** I-17.zip

Erik-

Here is another Dacey Dale email to one of our witnesses. It looks like this one was sent by "Dacey" on Sunday evening.

Wade

---

**From:** Mackey, Jason [<mailto:Jason.Mackey@ice.dhs.gov>]  
**Sent:** Tuesday, March 04, 2014 5:01 AM  
**To:** West, Hartley (USACAN); Rhyne, Wade (USACAN)  
**Subject:** FW: Dear Prof. Liou

See Dacey Dale email below.

--Original Message-----

**From:** Shy-Sheng P Liou [[ssl@sfsu.edu](mailto:ssl@sfsu.edu)]  
**Sent:** Tuesday, March 04, 2014 01:18 AM Eastern Standard Time  
**To:** Mackey, Jason  
**Subject:** FW: Dear Prof. Liou

Jason:

I got this email. What should I do?

ShyShengq

---

**From:** Dacey Dayle [[dacey2012@gmail.com](mailto:dacey2012@gmail.com)]  
**Sent:** Sunday, March 02, 2014 6:35 PM  
**To:** Shy-Sheng P Liou  
**Subject:** Dear Prof. Liou

Complete truth on TVU's I-17 petition...

# Witness Email

#5

**Rhyne, Wade (USACAN)**

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**From:** Mackey, Jason <Jason.Mackey@ice.dhs.gov>  
**Sent:** Thursday, March 06, 2014 4:35 PM  
**To:** Rhyne, Wade (USACAN); West, Hartley (USACAN)  
**Subject:** FW: TVU's I17 Petition  
**Attachments:** I17-Binder-Com.pdf

See email from "Jo Josephie" below. Note that it was sent Monday, March 3, but I just noticed it.

-----Original Message-----

**From:** Shy-Sheng P Liou [<mailto:ss@sfsu.edu>]  
**Sent:** Tuesday, March 04, 2014 11:53 AM  
**To:** Mackey, Jason; [jason.mackey1@dhs.gov](mailto:jason.mackey1@dhs.gov)  
**Subject:** FW: TVU's I17 Petition

Jason:

Another email.

ShySheng

---

**From:** Josephie Jo [[jojosephie@gmail.com](mailto:jojosephie@gmail.com)]  
**Sent:** Monday, March 03, 2014 11:11 PM  
**To:** Shy-Sheng P Liou  
**Subject:** TVU's I17 Petition

Dear Prof. Liou; -- Attached file for you review... just do not want to gov to see it first, they monitor the E-mail accounts.  
So create this one ...

# Witness Email

#6

**Rhyne, Wade (USACAN)**

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**Subject:** FW: Thank you for being TVU's research advisor  
**Attachments:** Teaching-And-Research-Faculty-TVU.pdf; Instructor Bio Form TVU-Amy-Guo.pdf

**From:** Amy Guo [mailto:[amymtguo@gmail.com](mailto:amymtguo@gmail.com)]  
**Sent:** Tuesday, March 04, 2014 9:00 AM  
**To:** Mackey, Jason  
**Subject:** Fwd: Thank you for being TVU's research advisor

Hi Jason,

I received this email with two attachments. It's upsetting to see they are still using my info and probably emailing out people's private info to whoever they email to.

Best,  
Amy

----- Forwarded message -----

**From:** Amy Guo <[amymtguo@gmail.com](mailto:amymtguo@gmail.com)>  
**Date:** Tue, Mar 4, 2014 at 8:46 AM  
**Subject:** Re: Thank you for being TVU's research advisor  
**To:** Dacey Dayle <[dacey2012@gmail.com](mailto:dacey2012@gmail.com)>

am shocked to receive this email and the attached files because  
1) You still haven't removed me from your data base after I made request for you to do so years ago;  
2) you illegally mail out people's private information such as phone numbers and salary info.

Please remove me permanently from your data base before I take legal action.

Amy Guo

On Mon, Mar 3, 2014 at 9:04 PM, Dacey Dayle <[dacey2012@gmail.com](mailto:dacey2012@gmail.com)> wrote:  
Research Faculty are normally manger and directors at industry and do not need to teach classes. only to supervise graduate student dissertation.

## A Message from the President



Located at the beautiful Tri-Valley area surrounded with championship golf courses and fine vineyards, as well as an extension of Silicon Valley, Tri-Valley University is a Christian higher education institution aiming to offer quality higher education in Engineering, Business and Ministry. The graduate degree and non-degree programs at Tri-Valley University is designated with the key of integration, integration of Christian faith and academics, integration of academic principles and industry application, integration of career pursuit with spirituality. Instructors and speakers at TVU are from both academic and industry background, many are well-known and respected leaders and professionals.

Tri-Valley University also offers dual educational instruction with residential classroom instruction, research program as well as virtual distance classroom access to facilitate the unique program in Engineering, Business and Ministry. Tri-Valley University synchronous distance learning facility makes its graduate courses available to the globe audience. People from all different country around the world can register the courses and attend the living virtual classroom to hear what the experts have to say. Students can have living access to classroom instruction with no limitation of location and also share a worldwide network of intellectuals in the same professional field.

Tri-Valley University enhances the intellectual, practical and spiritual capabilities of the individuals. Each program and course at TVU is designed to give you three things: the sound and clear principle understanding of the subject; fluent and skilful capability of industry application tool as well as a passion for in-depth research and the career in the subject field with Christ-like faith, character and compassion. My warm welcome to you, best wishes for every success of your study at Tri-Valley University, future's excellence in career as well as happiness and prosperity in life!

Susan Xiao-Ping Su Ph.D.  
Founder and President of TVU

## **Mission**

### **Faith Statement**

Tri-Valley University is a Christian Higher Education Institution offering **challenging** higher education including graduate degree and non-degree program in Engineering, **Business** and **Ministry**, with academic programs centripetal in Trinity, centrifugal and radiating from Trinity, the Center, to encompass diverse spheres of academic study and learning.

### **Mission Statement**

Tri-Valley University has graduate degree program (Master and Doctor Degree) and non-degree programs (Certificate Program and Open-Enrollment) in Engineering (Electrical Engineering, Computer Science and Mechanical Engineering), Business and Art in **Christian Ministry**. As a Christian Institution, Tri-Valley University education programs **integrate** Christian faith with the Academics learning; **integrate** the biblical worldview and principles with all academic programs, therefore emphasis both academic challenge and **personal** spiritual development. Our primary mission and objective is to make effective **Christian Scientists**, engineers and business leaders for the glory of God, equipping with both solid academic abilities and the principle of Christianity, therefore to live out **Chris-like Character**, faith, value and compassion in today's diverse and complicated world, and to make an **impact** in their career industry and society shining as its light.

Tri-Valley University academic program reflect the integration of academic **principle** and industry practical application. Our main programs are designed to motivate adults to pursue graduate study and attain graduate degrees, and therefore inspire them to reach the most potential in their careers and lives and lead a fulfilled personal life. Tri-Valley University provides students with an up-to-date curriculum which challenges the student to **integrate** his/her learning with his/her professional situation and goals; a curriculum which is both intellectually challenging and has applications in industry, especially semiconductor industry. While the graduate degree program emphasizes the in depth research capability of the students, all of the graduate courses are designed to give graduate students academic principles understanding, industrial practical application, as well as an emphasis on **spiritual** development and growth.

Tri-valley University offers both correspondence instruction and direct classroom instruction. The cutting-edge distance learning facility allows world wide access to our live quality classroom instruction. Tri-Valley University's dual on-site/on-line classroom instruction makes it possible to deliver the unique Engineering programs to the global audience and participants. At Tri-Valley University, we endeavor to sustain these principles with our graduate program by developing an operational environment that is professionally managed,



competently supervised, continually evaluated and appropriately modified, constantly improved to accomplish our stated mission

### **Education Philosophy and Purpose Statement**

Tri-Valley University equips the individual with intellectual, practical and spiritual capabilities with emphases on high academic standards, practical application and spiritual formation on the Christian worldview. The purpose of the institution is to lead students to the attainment of substantive graduate level educational objectives with solid academic principle understanding, skillful industrial application practices and in-depth research capability training with a foundation on Christian faith. Furthermore, Tri-Valley University strives to cultivate individual life-time learning and in-depth research capability as well as personal spiritual development, cultivate and strengthen Christ-like characters, values and compassion leading to career and life excellence.

All programs stress the very clear need for each student to be committed to continuing education throughout life and a life-long intimate relationship with God. The institution strives to provide our graduate students quality higher education, achieving the goal by overcoming and removing many barriers. The classes are scheduled in evenings or weekends to meet the time requirement for both part-time and full-time working students. The on-site classrooms are complimented with Virtual live synchronous access to classroom instruction to against heavy traffic, as well as accommodating the global participation. Besides dual instructional course work, on-site research facility fulfills the in-depth research requirement in Graduate Degree Program.

### **Institutional Objectives**

Our institutional Objective is to encourage, provide and deliver sound quality higher education degree and non-degree program to individual with both academic principle and industrious application integrated course and research work centering on Christianity. Our goal is to deliver the programs with faculty of experienced professionals and expert in the professional field who are also dedicated to imparting the very best of their knowledge and experience to others, as well as provide guidance into practical research work directly related to the industrial application. In course work, we will require that students demonstrate, through their submitted assignments and various work projects, the acquisition of the requisite knowledge appropriate to the rigor expectation of the level of degree pursued, and also require the ability to think critically in the analysis and the syntheses of information, and thereby make sound analyses, informed decisions and reasoned judgments. Each student will be exposed to current methods of research utilizing the Internet and other available technologies in addition to reliance on and utilization of traditional learning resources.

## Value

### Academic Excellence

Tri-Valley University promote and commits to academic and professional excellence with quality programs and aims to create, through our work and our relationships, an environment that cultivates individual's intellectual growth. Tri-valley University encourages and motivates individual to soar academically and keep the excellence through life and to live lives of personal fulfillment and be successful and productive in career, community, national, and world venues.

### Character Integrity

Tri-Valley University commits to maintaining a community of faculty, staff, and students which recognizes the inherent dignity and worth of each individual as being in the image of God. With a global involvement of the higher education program at Tri-Valley University, we strive to cultivate a culture center on Christ-like character, advocating personal and academic integrity emphasizing the importance of honest investigation, reflection, and intellectual inquiry.

### Compassion

Tri-Valley University cultivates and emphasizes individual's Christ-like compassion, a love for God, a love for academic study and learning, and a love and care for career, for the community, neighbors and coworker.

### Inclusion

Tri-Valley University advocates the principle of racial, cultural and economic inclusion and does not discriminate on the basis of age, gender, race, color, physical disability, national or ethnic origin in the administration of its educational programs, hiring policies, admission policies and other school-administered programs. In all programs and services, the institution is racially, socially, and culturally diverse. We encourage each individual with no regard to age, racial, sex, nationality and citizenship, to continue the pursuit of a higher graduate degree in his/her chosen professional field. We strive to deliver the good quality of graduate program to our students, work together with our graduate students to overcome all of the barriers to succeed in this pursuit. We also welcome the participation of individuals from all nationalities, races, and creeds, especially with our world wide Open Enrollment program.

### Integration

Tri-Valley University program reflects the key concept of integration, integration of academic study and spiritual growth, integration of academic principle and practical application, integration career development and spiritual maturity.

## University Location

Tri-Valley University main campus is located at the beautiful Tri-Valley area which is 50 miles east from San Francisco, 30 mile north form San Jose area. Tri-Valley is an extension of Silicon Valley and is the home and residential area of many engineers, professions, high level executives who work at Silicon Valley. Tri-Valley area offers good quality life with decent residential facilities, high-scored schools, championship golf courses, fine wine and vineyard. Tri-Valley University offers high education program in engineering including graduate degree and non-degree program in science and technology also reflects those natures.

University Main Office Address:

1257 Quarry Lane 105B

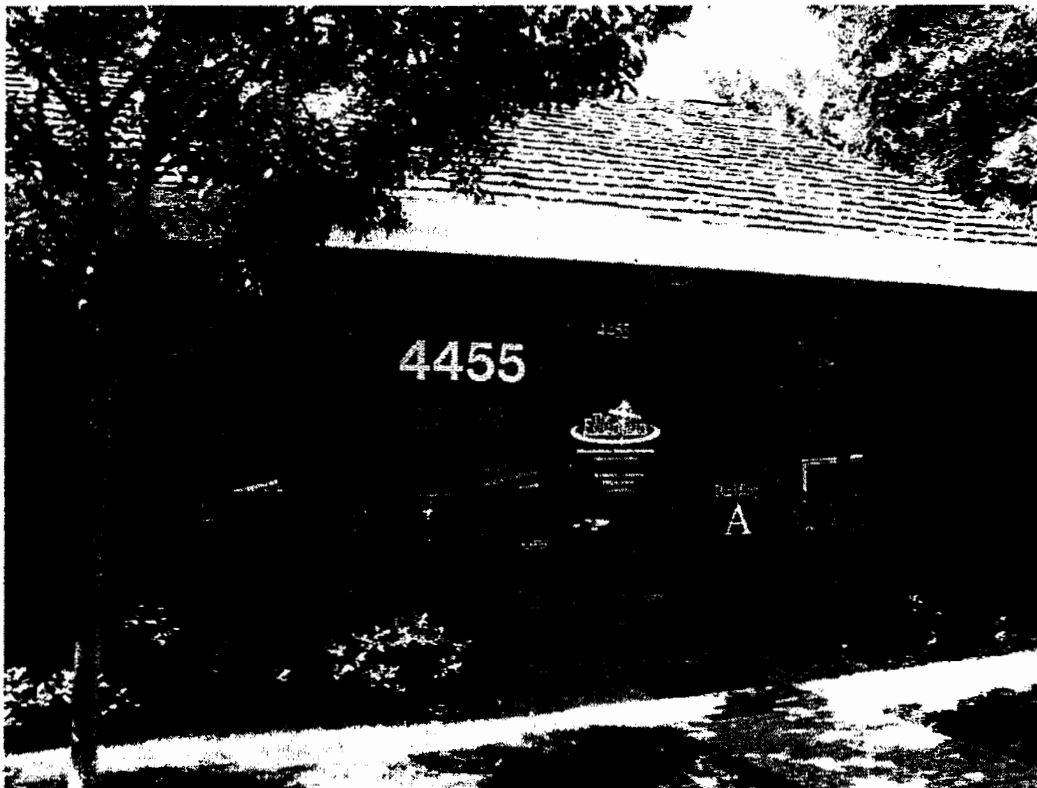
Pleasanton, CA 94566, USA

University On-Site Classroom Address:

4455 Stoneridge Drive

Pleasanton, CA 94588, USA

Click for a [map](#):



## Mechanical Engineering Courses

### ME 300 Dynamics (3 credits)

This course provides an introduction to the principle of dynamics. Topics cover Force and acceleration, work and energy, impulse and momentum, 3-D kinematics, gyroscopic motion, vibration, free vibration, spring-mass system, undamped forced motion, viscous damped free and forced vibrations, harmonic motion, resonance, transient and random excitation, multi-degree of freedom discrete systems, electrical circuit analogs.

Prerequisite: A course in college physics

### ME 301 Advanced Dynamics (3 credits)

This course focuses on the advanced topics on dynamics. Topics include Hamilton's Principle, particle dynamics, kinematics and kinetics of particle, angular momentum, kinetic energy, application of Lagrange equations, 3-D rigid body dynamics, transformation, multi-body dynamics.

Prerequisite: ME300

### ME 302 Engineering Mechanics (3 credits)

This course covers the fundamental concept and advanced principles of Engineering mechanics. Topics include Central and Moment of Inertia, Dynamic, Linear Motion and Projectiles, Relative Velocity and D'Alembert's Principle, Work Energy Method & Impulse Momentum, Impact of Elastic Bodies, Rigid Bodies Motion: Circular Motion, Rotation and general plane motion and Solids and fluids as continuous media.

Prerequisite: instructor consent

### ME 303 Mechanism Design (3 credits)

This course covers the fundamental and principle of various mechanism analysis and design. Topics include mechanism analysis and synthesis, kinematic diagram, mobility, degree-of-freedom, linkage, joints, four-bar linkage analysis, Spring, Flexure, Cam, Chain, coupling, clutching and braking, multiple-loop linkage and geared-linkages, pneumatic and hydraulic mechanism and synthesis of mechanism.

Prerequisite: instructor's consent.

### ME 304 Mechanical Behavior of Material (3 credits)

This course focuses on the mechanical behavior of engineering materials. Mechanical property of engineering material, crystal structure, structure-property relationships, materials selection for design, phase change, dislocation theory, elastic deformation and multiaxial loading, plastic deformation and yield criteria, dislocation plasticity and strengthening mechanisms, creep, stress concentration effects, fracture, fatigue, and contact stresses.

Prerequisite: instructor's consent

### ME 305 Heat Transfer (3 credits)

Steady 1-D, 2-D, 3-D heat conduction, unsteady state heat conduction, separation of



variables in rectangular/cylindrical/spherical coordinate system, Duhamel's theorem, Green's function, Finite-Difference Methods, integral-transform technique, heat transfer by radiation, fundamental of convection, free and forced convection. advanced statistical thermodynamics and kinetic theory concepts used to analyze thermophysics of microscale systems.

Prerequisite: instructor's consent

**ME 306 Fracture Mechanics (3 credits)**

Maximum shear-stress theory, distortion-energy theory, maximum normal-stress theory, comparison of yield and fracture criteria, failure surface for brittle materials, fracture mechanics deformation and fracture behavior of engineering materials for both monotonic and cyclic loading conditions and application in semiconductor system packaging.

Prerequisite: ME304

**ME307 Solid Mechanics (3 credits)**

Stress and strains, Hooke's law, torsion, beam statics, beam bending theory, beam deflection by direct integration, beam deflection by the moment-area methods, Euler buckling in elastic beams, elasticity, energy and virtual work methods, elastic analysis of system, plastic limit analysis.

Prerequisite: ME302 or ME300

**ME308 Fluid Mechanics (3 credits)**

This course focuses the fundamentals and techniques of fluid mechanics. Newtonian fluid mechanics, 1-D flows in confined geometries, Two- and 3-D flows are treated with Stokes' equations, Viscous flows, incompressible and compressible flow, computational fluid mechanics (CFD), and fluid mechanical at microscale.

Prerequisite: ME300 or ME 302

**ME309 Spatial Mechanism (3 credits)**

This course emphasizes three-dimension rigid body motion theory, coordinate transform, spatial joints, Revolute, Cylindrical, Prismatic, Helical joints, Spatial RCCC, links displacement, velocity and acceleration analysis, force and torque, 5-bar, 6-bar, 7-bar spatial mechanism analysis. Robot mechanisms, six-degree-freedom parallel manipulator.

Prerequisite: ME303

**ME310 FEA with ANSYS (3 credits)**

This course emphasizes Finite Element Analysis principle and application mainly with ANSYS simulation tool. Topics cover FEA theory, mesh types; domain discretization, polynomial interpolation, application of boundary conditions, assembly of global arrays, and solution of the resulting algebraic systems. FEA in structure mechanics, and in micro-electro-mechanical system; ANSYS simulation for dynamics, elasticity and plasticity, thermal and fluid system, and MEMS devices, with design simulation cases and examples.

Prerequisite: ME300

**ME311A Computer-Aided-Design with AutoCAD I (3 credits)**

The first class in the Computer-Aided Mechanical Design with AutoCAD covers fundamentals of mechanical design techniques and applications with AutoCAD. Topics include the basic set-ups, drawing with AutoCAD in two dimensions, working with blocks and external databases.

Prerequisite: Instructor's consent

**ME311B Computer-Aided-Design with AutoCAD II (3 credits)**

The second class in the Computer-Aided Mechanical Design with AutoCAD series covers the advanced techniques of mechanical design with AutoCAD. Topics include drawing in three dimensions, organizing and managing drawings, customizing AutoCAD and programming AutoCAD.

Prerequisite: ME311A

**ME312 Computer-Aided-Design with Solid-Work (3 credits)**

The CAD class covers variety of essential mechanical design techniques and applications with Solid-Work. Topics include basic sketching, basic part modeling, modeling a casting or forging, Part Symmetry, Design library, Patterning and revolved features.

Prerequisite: Instructor's consent

**ME313 Computer-Aided-Design with Pro-E (3 credits)**

The class in the Computer-Aided Mechanical Design series covers variety of mechanical design techniques and applications with Pro-E. Topics include user interface, sketching, extruding, modifying redefining features, creating a drawing, advanced drawing view, swept and blended features, advanced modeling techniques, assembly modeling and surface modeling.

Prerequisite: instructor's consent

**ME314 Control Theory (3 credits)**

This course includes the fundamental classic control theory and their application. Topics covers modeling in time and frequency domain, Laplace transform, transfer function, time response, zero and poles, block diagram, stability, root locus techniques, digital control system, z-transfer, transient and gain design in the z-plane. MATLAB is used for analysis.

Prerequisite: ME300

**ME315 Advanced Control Theory (3 credits)**

This course covers the advanced control engineering application in mechanical and electrical system. Topics covers system modeling, time and frequency domain analysis, closed-loop control system, classical design in s-plane and frequency domain, digital control system design, optimal and robust control system design, intelligent control system design.

Prerequisite: ME314

**ME324 Introduction to MEMS (3 credits)**

The course focuses on fundamentals of Micro-Electro-Mechanical System (MEMS) design. Topics cover the background of MEMS, micromachining technology, MEMS special process and integrated process runs; assembly processes, MEMS components and devices design sensing and actuation principle (capacitive, resonant, piezoresistive, piezoelectric, thermal, magnetic) and microfluidics systems, principle of miniaturization. Also listed as EE324.

Prerequisite: EE303

**ME325 Design of MEMS (3 credits)**

This course focuses on structure, process design and testing of micromachined sensors and system. Topics include design and fabrication of mechanical transducers, thermal sensors and actuators, optical and microfluidic systems. Design includes structure design, analysis and simulation, physical layout and fabrication to testing as well as on-chip signal process circuit design and integration. Also listed as EE325.

Prerequisite: ME324

**ME326 Resonant Sensor Design (3 credits)**

Course focuses on resonant accelerometer and gyros design. Topic covers resonant sensor principle, beam theory, mechanical structure design and simulation with Ansys, mask layout with Ledit or Cadence, on chip process circuit design, manufacture technology and process integration. Also listed as EE327.

Prerequisite: ME324

**ME327 Acoustic Sensor Design (3 credits)**

The course focuses on acoustic sensor design. Topics cover acoustic wave theory, Plane and spherical sound waves, piezoelectricity, TSM, and Surface Acoustic Wave, APM, FPM devices, acoustic wave based chemical and biological sensors. Also listed as EE328.

Prerequisite: ME324

**ME328 Data Acquisition System Design (3 credits)**

The course focuses on the design of a data acquisition system from hardware to software design. Topics covers computer architectures, hardware interface with A/D D/Aboard, digital I/O, data analysis, sampling technique, filtering, numerical integration and differentiation, data acquisition with Labview. Also listed as EE328.

Prerequisite: ME324

**ME329 Microfluidic Devices (3 credits)**

The course focuses on the design of microfluidic component and devices, emphasizing analytical applications of microfluidic technology. Topics cover micromachining methods, microfluidic operations, sample preparation and injection methods, detection technology, and various chemical and biological analyses, microvalve, microchannel, lab-on-chip from design, fabrication to application; electrokinetic separation techniques on chip, DNA analysis, cell analysis, microreactors and mass spectrometer interfacing. Also joint listed as EE329.

Prerequisite: ME324

**ME330 MEMS-based PCR (3 credits)**

The course focuses on the MEMS application in biological devices including a miniaturized PCR (Polymerase Chain Reaction) design. Topic covers miniaturization in biologic devices, DNA copying theory, PCR principle and procedure, miniaturization. Also joint listed as ME330.

Prerequisite: EE324

**EE331 RF-MEMS (3 credits)**

The course focuses on the MEMS-based RF component design and application. Topics cover MEMS-based capacitor, inductors, switches, resonator, antennas, MEMS-based phase shifter, filter, and oscillators. Application in wireless system.

Also joint listed as ME331

**ME332 Introduction to Bio-MEMS (3 credits)**

The course gives an introduction to the design and application of MEMS technology in Biological and medical areas, providing engineers with an understanding of the biological challenges and the engineering challenges of this burgeoning technology. Topics cover non-silicon process, microfluidic components and sensing technologies for sample preparation, delivery, and analysis; various applications and systems at the leading edge of BioMEMS technology in a variety of areas such as genomics, drug delivery, and proteomics.

Prerequisite: ME324

**ME 390 Special Topics in Mechanical Engineering (3 credits)**

The course provides an opportunity for a faculty member or a visiting scholar to offer a relatively new subject that is not currently available in the catalog, but is of great relevance to mechanical engineering. It may consist of lectures, reading, homework, presentation and project determined by the instructor.

Prerequisite: As specified in class schedule

**ME 399 Graduate Research (3 credits)**

By arrangement with thesis advisor. Conduct independent research of an approved topic in mechanical engineering.

Prerequisite: Graduate standing





**Tri-Valley University**

## **School of Business**

- **Master of Business Administration (MBA)**
  - MBA Emphasis Area A: Accounting
  - MBA Emphasis Area B: Finance
  - MBA Emphasis Area C: Marketing
  - MBA Emphasis Area D: Economics
  - MBA Emphasis Area E: Business Administration
  
- **Doctorate of Philosophy in Business Administration (Ph.D. in BA)**
  - DBA Major Field A: Business Administration
  - DBA Major Field B: Accounting and Finance
  - DBA Major Field C: Economy and Marketing
  
- **Business Administration Courses**

## **Tri-Valley University**

### **School of Business**

The primary objective of the School of Business at Tri-Valley University is to provide the fundamental and extensive knowledge, training to an intellectual on how to start a business, especially in high-tech, run the business, administrate and manage the business and further more to make the business a success. All of the courses and research work in the programs are designated to give students the principle understands of the subject, practical practice in the subject including computer software tool and information technology as well as in-depth research capability, capacity to lead in organizational situations, to apply knowledge in new and unfamiliar circumstances through a conceptual understanding of the specialization, capacity to adapt and innovate to solve problems, to cope with unforeseen events, and to manage in unpredictable environments.

The School of Business offers two graduate degrees mainly emphasizes the Business Administration area, Master of Business Administration (MBA) and Doctor of Philosophy in Business Administration (Ph.D. in BA). For the MBA program, there are five concentration areas: A. Accounting, B. Finance, C. Marketing, D. Economy, E. Business Administration and Management with a total of 36 graduate course and/or research work. The Ph.D. program is mainly concentrated in three major emphasis areas: Major A Business Administration, Major B, Accounting and Finance, Major C Economics and Marketing with in-depth knowledge and research capability training as well broad knowledge from both the business and technology sides with a total of 60 trimester units graduate course and research work including an approved dissertation.

The non-degree program includes certificate programs in each of the concentration areas include: account, finance, marketing, economic and business administration and management. The graduate classes are a combination of classic asynchronous on-line class and the live synchronous virtual classroom.

Among the faculty team at the School of Business at TVU, couples of the faculty members have many years' academic teaching and administration experience; several of them are Vice President of other universities, Academic Deans of famous university's business school. Most of them also have many years of experience in starting companies, managing corporations, directing advanced product development, and consulting for major companies.

The graduate degree program (MBA and Ph.D. in BA) and non-degree program are built in compliance with both ACICS for private universities and AACSB-The Association to Advanced Collegiate School of Business (<http://www.aacsb.edu/>) who is authorized to accredit international MBA and Ph.D. degree program.

**Tri-Valley University**  
**School of Business**  
**Masters of Business Administration (MBA)**

**I. Objective of Program**

The primary objectives of the master's degree program are: (1) to provide a knowledge base of interdisciplinary business theories and techniques to the students, particularly to the working adult population, and (2) to train and to develop students' practical management skills in a chosen concentrated area for career development, and (3) to develop the students' decision-making capability to face the challenge of the dynamic business world staged with diverse, multicultural, and global business settings.

More specifically, the MBA program develops the students' capacity to lead in organizational situations, to apply knowledge in new and unfamiliar circumstances through a conceptual understanding of the specialization, capacity to adapt and innovate to solve problems, to cope with unforeseen events, and to manage in unpredictable environments.

**II. Emphasis Areas**

The Master of Business Administration (MBA) program at Tri-Valley University mainly focuses on five concentration study areas:

MBA Emphasis Area A:	Accounting
MBA Emphasis Area B:	Finance
MBA Emphasis Area C:	Marketing
MBA Emphasis Area D:	Economics
MBA Emphasis Area E:	Business Administration

The MBA program requires a total of 36 trimester units of graduate course and research work within which a maximum of 6 units can be research credits. For MBA program, there are three MBA study plans: Plan I Thesis Plan, student need to take 30 Unit of graduate course work and a M.S. thesis with 6 unit of research; Plan II includes 33 units of graduate course work and a 3 unit M.S. project; Plan III are complete course work with a comprehensive examination;. Each plan study requirements are detailed in the MBA curriculum section. A full-time student is able to complete the program in one year taking 4 courses each trimester. A part-time student needs to complete the program requirement within a maximum of 5 years in order to be granted the degree.

**III. Admission Requirements**

For admission to the MBA program, the applicant must have a bachelor's degree in Business Administration, Art or Engineering fields with a minimum GPA of "3.0" or "B". Student who holds a B.S. degree in other fields other than Business Administration need to consult the graduate advisor on taking the pre-required courses. For admission to MBA program, the GMAT is preferred but not required.

Students are allowed to transfer a maximum of nine (9) graduate semester units from another recognized institution towards the MBA degree program at TVU. The minimum required grade is B-.

#### **IV. MBA Curriculum**

The total units required for MBA degree are 36 semester units of graduate courses and research work beyond the bachelor degree consisting of at least 30 units of course work and/or a maximum 6 units of research work. The 10 courses (30 trimester units) courses work are 5 (15 units) required courses as general requirement, 3 core courses (12 units) in the selected emphasis study area, 2 elective courses (6 units) from other area of emphasis (the elective course can from other engineering programs as well). For MBA program, there are three study Plans detailed as follows:

##### **Plan I: MBA with Thesis**

The Plan I with thesis is more focus on the research capability. Students are required to take a total of 30 trimester units of graduate course (10 courses) with a 6 unit of research work lead to a thesis approved by a faculty advisor. Among the 10 courses, 5 are the required course as listed following; at least 3 courses must be from the major field of emphasis area, and the rest 2 can be elective courses which can be from either within or outside the school of business, such as from Computer Science Department, or a specific product in MEMS area for an example. After student finished 10 courses work as specified or during the course work, they can start their at least two trimester research work under the supervision of a faculty advisor and lead to a thesis approved and signed by the advisor faculty member, the academic advisor and a co-advisor. The MBA thesis is required to have three faculty members' signatures: one is the chair advisor, one co-advisor and one academic advisor.

##### **Plan II: MBA with Project**

Students are required to take a total of 33 trimester units of graduate course (11 courses) with a 3 unit of research work lead to a project report approved by a faculty member. Among the 11 courses, 5 are the required course as listed following; at least 3 courses must be from the major field of emphasis area, and 3 can be elective courses which can be from either within or outside the school of business, such as from Computer Science Department, or a specific product in MEMS area for an example. After student finished 11 courses work as specified or during the course work, they can start their one trimester research work



under the supervision of a faculty member and lead to a project report approved and signed by the advisor faculty member and the academic advisor.

**Plan III: MBA with Complete Course Work Plan**

Students are required to take a total of 36 trimester units of graduate course (12 courses) with a comprehensive exam. Among the 12 courses, 5 are the required course as listed following; at least 3 courses must be from the major field study of emphasis area, and rest 4 are elective course which can be either within or outside the school of business, such as from Computer Science Department, or a specific product in MEMS area for an example. After student finished 12 courses work as specified, they can apply for graduation and take the comprehensive exam. The comprehensive exam is a 3 hour exam holding on-line.

The 5 required courses (15 semester units) are:

BA300	Business Communication	3 units
BA 301	Business Law	3 units
BA 370	Business Administration and Management	3 units
BA 380	Business Administration CEO Seminar	3 units
CM361	Christian Faith	3 units

The 3 core courses are required from each emphasis study area (9 semester units):

MBA Emphasis Area A:	Accounting
MBA Emphasis Area B:	Finance
MBA Emphasis Area C:	Marketing
MBA Emphasis Area D:	Economics
MBA Emphasis Area E:	Business Administration

<b>MBA Program Curriculum: Total 36 Trimester Units</b>				
Plan I MBA Thesis Plan	Total 30Units Course Work (10Courses)			6 Units Research and thesis
	Required Course	Core Course	Elective Course	BA399 2 trimester research work with a Thesis.
	5 courses	3 Courses	2 Courses	
	15 Units	9 Units	6 Units	
30 Units Course Work (10 Courses)			6 units Research work	
Total of 36 Unit course and research work				
Plan II MBA With Project	Required Course	Core Course	Elective Course	M.S. Project
	5 courses	3 Courses	3 Courses	BA399 (3units)
	15 Units	9 Units	6 Units	One trimester research work
	Total 33 Units Course Work (11 Courses)			3 Units Research Work
Plan III MBA Course only	Required Course	Core Course	Elective Course	Complete Course
	5 courses	3 Courses	4 Courses	Complete course work with a Comprehensive Exam
	15 Units	9 Units	12 Units	
	Total 36 Units Course Work (12 Courses)			

Graduate courses in the five emphasis area are listed as follows:

**MBA Emphasis Area A: Accounting**

Course #	Course Name	Core Course	Units
BA 310	Fundamental of Accounting	X	3
BA311	Accounting & Bookkeeping	X	3
BA 312	Cost Accounting	X	3
BA312B	Managerial Accounting	X	3
BA313	Principles of Accounting	X	3
BA314	Advanced Accounting	X	3
BA315	Financial Accounting	X	3

**MBA Emphasis Area B: Finance**

Course #	Course Name	Core Course	Units
BA 320	Fundamental of Finance	X	3
BA 321	Principle of Finance	X	3
BA 322	Corporate Finance	X	3
BA 323	Advanced Corporate Finance	X	3
BA 324	Quantitative Finance	X	3
BA 325	Financial Analysis	X	3
BA 326	International Finance	X	3
BA 327	Financial Management	X	3
BA 328A	Investment Strategy	X	3
BA 328B	Investment Analysis	X	3
BA370	Business Administration and Management	X	3
BA 380	Seminar in Business Administration	X	3

**MBA Emphasis Area C: Marketing**

Course #	Course Name	Core Course	Units
BA 330	Marketing Management	X	3
BA 331	International Marketing	X	3
BA 332	International Trade	X	3
BA 333	Global E-Commerce	X	3
BA370	Business Administration and Management	X	3

**MBA Emphasis Area D: Economy**

Course #	Course Name	Core Course	Units
BA 340	Principle of Macroeconomics	X	3
BA 341	Modern Macroeconomics	X	3
BA 342	International Macroeconomics and Finance	X	3
BA 343	Principle of Microeconomics	X	3
BA344	Managerial Economics	X	3
BA370	Business Administration and Management	X	3
BA 380	Seminar in Business Administration	X	3

**MBA Emphasis Area E: Business Administration**

Course #	Course Name	Core Course	Units
BA 350	Principles of Management	X	3
BA351	Operational Management	X	3
BA352	Project Management	X	3

BA353	Human Resource Management	X	3
BA354	Innovation Management	X	3
BA355/ CS309	Database Management System	X	3
BA356	International Business Management	X	3
BA357	Supply Chain Management	X	3
BA358	Strategic Management	X	3
BA359	High-Tech Entrepreneurship	X	3
BA360	Quality Management	X	3
BA361	Risk Management	X	3
BA362	Managerial Leadership	X	3
BA 370	Business Administration and Management	X	3
BA 380	Seminar in Business Administration	X	3
BA 301	Business Law	X	3
BA 302	Patent Law	X	3

## V. MBA Graduation Requirements

For MBA degree, students need to complete total of 36 trimester units of graduate course and/or research work including the Business Administration seminar and maintain an overall grade point average (GPA) of 3.0.





**Tri-Valley University  
School of Business**

**Doctor of Philosophy in Business Administration (Ph.D.)**

❖ **Objective**

The Doctor of Philosophy Degree in Business Administration (Ph.D. in BA) at Tri-Valley University is a practice-oriented research-emphasized degree program designed to provide students mastery of a very specific subject, theory, and methodology in Business Administration emphasis area. The program is designed to enforce student research capability and gain in-depth knowledge in Business Administration concentration area at the same time gaining breadth knowledge in the general field of finance, marketing and economy etc. The Ph.D. in Business Administration programs also aim to develop the student's ability to integrate and apply original and practical research into the real world business entrepreneur and management, ability to create knowledge through original research in their areas of specialization.

There are three major areas: Area A: Business Administration and Management; Area B: Accounting and Finance; Area C: Economy and Marketing. The awarding of the Ph.D. in BA signifies that the student has completed the advanced academic requirements in Business Administration subject area, accomplish specified goals and objectives and contribute to competence in the subject area or profession at an advanced level. To have a Doctorate Degree in the above specified area, students are attained specialized and practical competence which qualifies the recipient for opportunities and additional responsibilities beyond the MBA degree level and are prepared highly specialized careers in academe or practice. More specifically, the objectives of Ph.D. in BA programs at TVU include:

- The acquisition of advanced knowledge in areas of specialization.
- The development of advanced theoretical or practical research skills for the areas of specialization.
- Explicit attention to the role of the specialization areas in managerial and organizational contexts.
- Preparation for teaching responsibilities in higher education
- Dissertation and demonstrating personal integration of, and original Intellectual contribution to a field of knowledge.

### ❖ Length of Study

The doctorate degree normally is earned over three to five years or the equivalent. However the Ph.D. must be completed in no fewer than two years from the date of initial enrollment and no more than ten years from the date of initial enrollment.

### ❖ Admissions

#### ➤ Admission Requirement

A Baccalaureate or Master's degree in the Business administration or a related field, such as accounting, finance, economy or marketing; earned at an appropriately accredited institution with a minimum GPA of "3.0" or "B" is required for admission to the Ph.D. program besides the admission requirement in the general admission requirement for doctorate program. For students admitted with a B.S. degree, they are required to take a total of 90 units of graduate course and research work. For students with a MBA degree admitted to the DBA program, they only need to take a total of 60 units of graduate course and research work. For admission o Ph.D. program, GMAT score is preferred, but not required.

#### ➤ Transfer of Credit.

A maximum of 12 units of credit for appropriate master's or doctorate-level course work from another accredited institution can be transferred towards the Ph.D. program at TVU. The minimum GPA requirement for transferred credit is B.

#### ➤ Tuition and fee

Tuition and fee as well as refund policy for course work and research work for Ph.D. at TVU are the same as the tuition fee per units specified in the university general tuition and fee list. The graduation fee is \$100.00 for Ph.D. program when student complete the course and research work and file for graduation.

### ❖ Degree Requirement

The Doctor Degree in Business Administration (Ph.D. in BA) program gives students the in-depth knowledge and trains student the research capability in one concentration area Business Administration. The Ph.D. in BA program at TVU requires both graduate course and research work of a total of 60 units beyond MBA degree or a total of 90 trimester units after the baccalaureate degree. Among the 60 units, a maximum of 15 units can be graduate research work and at least 45 units are graduate course work. Student admitted into the DBA program with a bachelor degree need to complete a total of 90 units of course and research work among which a maximum of 15 units can be graduate research. The Ph.D. in BA program also required a dissertation with significant research contributions approved and signed by the dissertation committee. In general for graduate research, the Ph.D. study requires a Qualify exam and an approved dissertation.

➤ **Course Work**

The Ph.D. in Business Administration program requires at least 45 units (15 courses) of course work beyond M.S. degree in the major field of Business Administration and other minor fields. Among the 45 trimester units (15 courses) graduate course work, at least 7 courses must be on the concentration area of Business Administration and Management. 4 courses need to be from a minor area within the school of business including account and finance, economy and marketing with 2 courses from each of the at least 2 emphasis areas (see the concentration areas course list in the MBA program) with a total of 4 courses in the Minor I area inside the school of business. 4 courses of Minor II must be from areas outside school of business: two courses must be from Computer Science Department or Information Technology, and the other two must be from engineering field with an overview of the product development and technology. Students admitted into Ph.D. in BA program with a baccalaureate degree need to complete a total of 25 courses (75 units) distributed in the specified major/minor field. Total 45 units course work beyond MBA (Total 75 units after B.S.)

- Major Courses in Business Administration: 7 Courses            21 units
- Minor I within School of Business        4 Courses (two in each area) 12units
- Minor II from School of Engineering    4 Courses (two from CS)    12 units

➤ **Research Work**

In order to award the Ph. D. in BA degree, student needs to conduct quality research work in the area of Business Administration and Management toward an approved dissertation. A total of 15 units research work under the guidance of a chair faculty member in the major field of Business administration are required.

- **Qualify Exam:** The dissertation should be based on original, or applied research. The topic of the dissertation shall be approved by the chair dissertation advisor. Prior to enter into doctorate research work, student needs to take a Qualify exam. There is no time requirement for a student admitted in Ph.D. program with a M.S. degree to take Qualify exam to start the research work. However, for student admitted into Ph.D. program with a baccalaureate degree need to complete minimum of 30 units graduate-level course work before taking the exam and starting the research. The Qualify Exam normally covers 3 areas of fundamental knowledge and in close book format for 6 hours, with 2 hours in each area. Student with a Master degree normally take the exam at the second tri-meter of enrollment. Student with a Bachelor degree normally can take the Preliminary exam within the first year. If a student fails the first time, he/she can try another time. If he/she fails the second time, it will disqualify him/her to pursue the Ph.D. study.
- **Dissertation Committee:** For the Ph.D. in BA degree, a supervisory dissertation committee of at least three faculty members must be formed for each student. At least one committee member must be from the major field of Business Administration serving as the chair dissertation advisor, and at least one committee

member must be outside the School of business. All committee members must have demonstrated appropriate scholarship, experience, or practice in the subject area. Students have the option of nominating their dissertation members or major professors for university final approval.

- An oral defense of the doctoral candidate's final project or dissertation with the dissertation committee is required. This may be conducted in person or at a distance. TVU will not award the Ph. D. in BA degree unless a majority of the dissertation committee approves the student's dissertation.

❖ **Ph.D. in BA Degree Program Curriculum**

The Ph.D. in Business Administration degree program requires a total of 60 units of graduate course and research work beyond M.S. degree and a total of 90 units of graduate study after bachelor degree. The Ph.D. in BA program at Tri-valley University mainly focuses on one major field of study: Major A, Business Administration and Management, Major B Accounting and Finance and Major C Economy and Marketing. Course work in other emphasis areas in the School of Business including accounting and finance, economy and marketing are required as the minor field of study. Ph.D. degree program also requires student to take classes outside of School of Business, in the engineering field as one minor. For the outside minor course work, at least two of them must be from computer science and information technology.

Major Field A: Business Administration  
 Major Field B: Accounting and Finance  
 Major Field C: Economy and Marketing

<b>Ph.D. in Business Administration Degree Program Curriculum</b>			
45 Units Graduate Course Work (15 Courses)			15 Units Research Work
Major Field	Minor I (Inside school of Business)	Minor II (Outside of Business)	An approved Dissertation
Business Adminis.	2 courses from Minor IA	2 courses Minor IB 2 course from CS or IT 2 courses from engr.	
7 courses	4 Courses	4 Courses	
21 Units	12 Units	12 Units	
<b>Total 60 Semester Units</b>			

Courses in each of the major field are listed as follows:

**Major Area A:  
 Business Administration and Management**

Course #	Course Name	Core Course	Units
BA 350	Principles of Management	X	3
BA351	Operational Management	X	3
BA352	Project Management	X	3
BA353	Human Resource Management I	X	3
BA354	Innovation Management	X	3
BA355/ CS309	Database Management System	X	3
BA356	International Business Management	X	3
BA357	Supply Chain Management	X	3
BA358	Strategic Management	X	3
BA359	High-Tech Entrepreneurship	X	3
BA360	Quality Management	X	3
BA361	Risk Management	X	3
BA362	Managerial Leadership	X	3
BA370	Business Administration and Management	X	3
BA 380	Seminar in Business Administration	X	3
BA 301	Business Law	X	3
BA 302	Patent Law	X	3

**Major Area B: Accounting and Finance**

Course #	Course Name	Core Course	Units
BA 310	Fundamental of Accounting	X	3
BA311	Accounting & Bookkeeping	X	3
BA 312	Cost Accounting	X	3
BA312B	Managerial Accounting	X	3
BA313	Principles of Accounting	X	3
BA314	Advanced Accounting	X	3
BA315	Financial Accounting	X	3



BA 320	Fundamental of Finance	X	3
BA 321	Principle of Finance	X	3
BA 322	Corporate Finance	X	3
BA 323	Advanced Corporate Finance	X	3
BA 324	Quantitative Finance	X	3
BA 325	Financial Analysis	X	3
BA 326	International Finance	X	3
BA 327	Financial Management	X	3
BA328A	Investment Strategy	X	3
BA328B	Investment Analysis	X	3
BA 380	Seminar in Business Administration	X	3

**Major Area C: Economy and Marketing**

Course #	Course Name	Core Course	Units
BA 330	Marketing Management	X	3
BA 331	International Marketing	X	3
BA 332	International Trade	X	3
BA 333	Global E-Commerce	X	3
BA 340	Principle of Macroeconomics	X	3
BA 341	Modern Macroeconomics	X	3
BA344	Managerial Economics	X	3
BA 342	International Macroeconomics and Finance	X	3
BA 343	Principle of Microeconomics	X	3
BA 380	Seminar in Business Administration	X	3

❖ **Graduation Requirements**

To be awarded the Ph.D. degree, students need to complete 60 trimester unit of course and research work with an approved and signed dissertation and maintain an overall grade point average (GPA) of 3.0 in course work. For research work, the dissertation needs to be approved and signed by the dissertation committee members. To reflect the quality of the research, student is encouraged to have at least one publication at the peer reviewed conference or journal.

**Business Administration Courses**

**Business Administration Course Number Convention:**

- BA300 Fundamental BA Courses**
- BA 310-319 Accounting**
- BA320- 329 Finance**
- BA 330-339 Marketing**
- BA 340-349 Economy**
- BA 350- above Business Administration**

**BA300 Business Communication (3 credits)**

The course covers the important communication skills essential for success business management. Topic includes public speaking skills, effective communications, basic requirement for written communication, listening skills for positive communication, effective presentation of information in technical report and technical writing.

Prerequisite: Graduate Standing

**BA301 Business Law (3 credits)**

The course covers the basic of business law to legal requirement and issues associated with forming, managing and operating a high tech business in the global economic environment. Topics include contract law, tort, employment law, corporate law, partnerships, sole proprietorships, securities law and Intellectual Property law.

Prerequisite: Graduate standing

**BA302 Patent Law (3 credits)**

The course teach how to apply and file a technology patent. Topics include provision patent, patent search, writing and application procedure in the US and worldwide.

Prerequisite: Graduate standing

**BA310 Fundamental of Accounting (3 credits)**

The first class of counting covers the practice issues in accounting and finance and understanding accounting basics. Topics include the financial statement, accounting system, accounting process, asset, cash, inventory, prepaid expenses, fixed assets, statement of cash flow. QuickBooks is taught in this class.

Prerequisite: Graduate standing

**BA311 Accounting & Bookkeeping (3 credits)**

The first class covers the theory and fundamental of accounting and bookkeeping with Quickbook. Topics include asset, liabilities, debits and credits, journalizing and posting transactions, adjusting and closing procedures, repetitive transaction and cash journal, costing merchandise inventory, negotiable instrument, controlling cash, payroll, property, plant and equipment.

Prerequisite: BA310

**BA312 Cost Accounting (3 credits)**

This course covers Cost Analysis and Control, procedures of cost accounting and control for manufacturing firms. Topics include cost-volume-profit relationships; standard costs and variance analysis; direct costing; activity-based costing, relevant costing, budgeting, inventory control, capital asset selection, responsibility accounting, performance measurement, and Management Accounting.

Prerequisite: BA 310

**BA312B Managerial Accounting (3 credits)**

The class emphasizes the use of accounting data within an organization by its managers. Topics include the accounting system, concepts and principles, financial statement and ratios, management account, using accounting information for marketing, operation, human resource, accounting and strategic investment decision making and control, and research in management accounting.

Prerequisite: BA310

**BA313 Principles of Accounting (3 credits)**

The class covers the basic accounting principles. Topics include measuring revenues and expenses, report earning and financial position, computerized accounting systems, analysis of financial activities, investing activities and analysis of investing activities, Analysis Operation Activities.

Prerequisite: BA310

**BA314 Advanced Accounting (3 credits)**

This class covers the advanced accounting topics. Topics include business combination, consolidated statements, intercompany transactions: merchandise, plant Assets, notes, bonds and leases, Cash Flow, EPS, Taxation, and Unconsolidated Investments, Accounting for an Investment in a Subsidiary, Governmental Accounting, Private Not-for-Profit Organizations, Debt Restructuring, Corporate Reorganizations, and Liquidations.

Prerequisite: BA310

**BA315 Financial Accounting (3 credits)**

The class covers the key concepts in financial accounting. Topics include analysis business earning, forecast and budget, taxes and business decision, global finance, making key strategic decisions—going public, profitable growth by acquisition, business valuation etc.

Prerequisite: BA310

**BA320 Fundamental of Finance (3 credits)**

This course covers the basic concepts and applications of modern financial theories emphasizing on the finance function and its relationship to other decision-making areas of a business. Topics include financial statement analysis, the time value of money; the valuation of financial securities and debt; Capital Budgeting; and determining the true Cost of Capital.

Prerequisite: Instructor's Consent



**BA321 Principle of Finance (3 credits)**

This course covers the operational principle of financial markets and mathematical financial models. Topics include option theory, numerical method, further option theory, interest rate derivative product.

Prerequisite: Instructor's Consent

**BA322 Corporate Finance (3 credits)**

This class provides an introductory to corporate finance with the fundamental principle. Topics cover value and capital budgeting, return and risk, capital structure and dividend policy, dividend and repurchase, multinational financial management and working capital management.

Prerequisite: Instructor's Consent

**BA323 Advanced Corporate Finance (3 credits)**

This first one is an advanced course in corporate finance. Topics cover value bonds, net present value and other investment criteria, common stock/preferred stock, venture capital, Mergers, Acquisitions, and Corporate; International Financial Management

Prerequisite: BA 321

**BA324 Quantitative Finance (3 credits)**

This course covers the security analysis for investment and corporate finance. is an advanced course in financial engineering with modern quantitative applications in finance. Topics cover value at risk, credit risk, implied volatility and recently developed econometrics methods.

Prerequisite: BA 321

**BA325 Financial Analysis (3 credits)**

This course covers valuation and the security analysis for investment and corporate finance. Topics include introduction top valuation, estimating discount rate,, cash flows, growth and terminal value, equity and firm DCF models, relative valuation, value cash and cross holdings, the value of intangibles, control, liquidity, synergy and transparency.

Prerequisite: Instructor's Consent

**BA326 International Finance (3 credits)**

This course covers global financial environment, corporate foreign-exchange risk management, global financing strategy and global invest strategy. Topics include motives for World Trade and Foreign Investment, the international money system, the foreign-exchange market and parity, currency futures and options, exchange rate forecasting, manage transaction and economic exposure, global financing strategy.

Prerequisite: Instructor's Consent

**BA327 Financial Management (3 credits)**

The course covers the fundamentals concepts, tool and application of financial management. Topics include objective of financial management, valuation principles, and the relation between risk and return. Financial decision-making, the management

of long-term investment and sources of funds, and working capital management, international financial management, financial planning and strategy.

Prerequisite: Instructor's Consent

**BA328A Investment Strategy (3 credits)**

This course covers investment philosophy and strategies. Topics include buying and selling approaches, top down investing, main investing styles, popular approaches, mechanical strategies, market cap investing and financial ratios.

Prerequisite: Instructor's Consent

**BA328B Investment Analysis (3 credits)**

This course covers investment analysis and management. Topics include Selecting investment in a global market, Organization and function of securities markets, Portfolio management, analysis of stock market, industry, technical and bond.

Prerequisite: Instructor's Consent

**BA330 Marketing Management (3 credits)**

This course covers the substantive and procedural aspects of marketing management, Topics include, basic tasks of marketing and the major concept and tools of marketing, manage and plan marketing process, customer analysis, competitor and company analysis, product strategy and pricing, advertising and promotion, market implementation and evaluation.

Prerequisite: Instructor's Consent

**BA331 International Marketing (3 credits)**

This course covers the challenge and special requirement of managing the global marketing. Topics include analysis of global market environments, research and marketing strategies for globalization, targeting, and entry strategies for global markets, sourcing and global production strategy, global pricing strategies, global advertising, and management of global distribution channels.

Prerequisite: Instructor's Consent

**BA332 International Trade (3 credits)**

This course covers the international trade and business, law, policy and ethics. Topics include the united national convention on contract for the goods, the unidroit principles of international commercial contract, carriage good by sea, land and air, finance exports, trading blocs and international commercial arbitration.

Prerequisite: Instructor's Consent

**BA333 Global E-Commerce (3 credits)**

This course introduces the global electronic commerce theory with case study. Topics include E-commerce infrastructure, supply chain management and information alliances, telecommunications technology, electronic auctions and intermediaries, electronic financial markets, logistics and service opportunities and Issues.

Prerequisite: Instructor's Consent

**BA340 Principle of Macroeconomics (3 credits)**

This course introduces the principles of Macroeconomics- the study of the economy as a whole—including growth in incomes, changes in prices, and the rate of unemployment. Topics cover Classic macroeconomic model, Growth Theory, Business Cycle Theory and Macroeconomic Policy Debates.

Prerequisite: Instructor's Consent

**BA341 Modern Macroeconomics (3 credits)**

This course covers the modern macroeconomics its origins, development and current state. Topics include orthodox Keynesian school, orthodox monetarist school, the new classical school, the real business cycle school, new Keynesian school, the Post Keynesian school and the Austrian school and new political macroeconomic.

Prerequisite: Instructor's Consent

**BA342 International Macroeconomics (3 credits)**

This course is an advanced class in international macroeconomics and finance with integration of both theoretical and empirical issues. Specific topics include the monetary model, the lucas model, international real business cycles, foreign exchange market efficiency, the real exchange rate, the mundell-fleming model, the new international macroeconomics, target-zone models and balance of payments crises.

Prerequisite: BA340

**BA343 Principle of Microeconomics (3 credits)**

This course introduces the principle of microeconomic; Topics include the firm and consumer, market, general equilibrium, uncertainty and risk, welfare, strategic behavior, government and the individual.

Prerequisite: Instructor's Consent

**BA344 Managerial Economics (3 credits)**

This course covers Application of economic analysis for decision making in business. Topics include relationship between the firm, consumers and the marketplace; market structures, pricing policies, production possibilities and planning.

Prerequisite: Instructor's Consent

**BA350 Principles of Management (3 credits)**

This course introduces principles of management with emphasis on the practical application of management theory and concepts. Topics covers specific management functions such as planning, organizing, motivating, controlling, and decision-making communication and negotiation with practical application on how to develop entrepreneurs. Specific topics include management role, function, level and skill, behavioral theory of management, globalization and strategic leadership models.

Prerequisite: Instructor's Consent

**BA351 Operational Management (3 credits)**

This course covers basic theories about production and operations management including basic management processes, resource conversions, and behavioral

applications within production/operations. Emphases will be on planning, organizing, controlling, and balancing quantitative aspects and behavioral applications in production/operations management; operations strategy will be the guide for topical integration. Topics include operations management, operations strategies for competitive advantage, forecasting in operations, facility and layout planning, product and process design choices, scheduling, inventory control and quality control.

Prerequisite: Instructor's Consent

**BA352 Project Management (3 credits)**

This course covers the framework, standard of project management. Topics include project integration management, project scope, time, cost, quality, human resource, and communication, risk and procurement management.

Prerequisite: Instructor's Consent

**BA353 Human Resource Management (3 credits)**

This course gives a comprehensive overview on the essential company human resource management concepts and techniques as well as advanced company human resource management strategies and challenges. Topics covers strategic human resource planning, effective HR management, global human resource management, diversity and equal employment opportunity, training human resources, performance management and appraisal, compensation strategies and practices, managing employee benefits, employee rights and discipline, and globalization of HR management

Prerequisite: Instructor's Consent

**BA354 Innovation Management (3 credits)**

The course covers the innovation management, strategies, concepts and tools for growth and profit. Topics include strategies and concept for innovation, innovation imperative, portfolio, voices and mind, tool for profit and benefits, market, demand and custom intimacy and calculation risk.

Prerequisite: Instructor's Consent.

**BA355/CS309 Database Management System (3 credits)**

This course provides an in-depth introduction to database management system including design, tuning and implementation of relational database applications, as well as in-depth coverage of the state of the art in currently available commercial systems. Topic includes basic of database system, relational models, relational queries, SQL queries and programming, data storage and index, database design and transaction management.

Prerequisite: Instructor's Consent

**BA356 International Business Management (3 credits)**

This course gives a comprehensive overview on managerial behavior within a cross-cultural environment, analyzing problems confronting managers in international operations. Topics include theory and international business, government and trade, economic integration and cooperation, foreign direct investment, process of country evaluation and selection, establishing and conducting international transactions.

Prerequisite: Instructor's Consent

**BA357 Supply Chain Management (3 credits)**

This course covers the current state of supply chain management theory and practice. Topics include criteria of good supply chain, supply chain architecture, collaboration spectrum, using metrics to drive business success.

Prerequisite: Instructor's Consent

**BA358 Strategic Management (3 credits)**

This course covers both theoretical and practical aspects of strategic thinking and management including the process of strategic implementation. Topics include strategic planning, internal analysis, business-level strategy, Hi-Tech strategies, global strategy, corporation strategy, performance and ethics.

Prerequisite: Instructor's Consent

**BA359 High-Tech Entrepreneurship(3 credits)**

This course covers all aspects of building an international start-up company in high technology area. Topics include feasibility study for a startup, financial and legal issues of a Hi Tech startup prepare for venture capital funding, business plan for a start-up venture.

Prerequisite: Instructor's Consent

**BA360 Quality Management(3 credits)**

This course emphasizes the strategic importance of effective quality management and provides a basis for systems approach to teamwork. Topics cover management tools to measure and improve a system or process in an organization, the responsibility of the leaders in various levels in organization including managers, supervisors and team leaders.

Prerequisite: Instructor's Consent

**BA361 Risk Management (3 credits)**

This course covers the fundamentals of risk management. Topics include identify and analysis project risk, risk reduction plan, control of risk-related factor, manage project under risk condition and method for ongoing risk assessment and project performance evolution.

Prerequisite: Instructor's Consent

**BA362 Managerial Leadership**

This course emphasizes the leadership side of managerial leadership and the leadership issues. Topics cover leading and managing change as a manager, developing your associate and yourself, coaching, teaching and mentoring, managerial leadership in action, giving and receiving feedback,

Prerequisite: Instructor's Consent

**BA370 Business Administration and Management(3 credits)**

This course is a summary and overview of the business administration and



management. Topics cover business management, project management, multicultural, management, pressure management, marketing management, supply chain management and innovation management.

Prerequisite: Instructor's Consent

**BA380 Seminar in Business Administration (3 credits)**

The Seminar in Business Administration invites the world famous and successful CEOs of major giant companies to share their experience of entrepreneur, talking about their success secret, management techniques, as well as the mistakes and places need to avoid for failure in their point of view. Can be taken repeatedly.

Prerequisite: Graduate Standing

**BA390 Special Topics in Business Administration (3 credits)**

The course provides an opportunity for a faculty member or a visiting scholar to offer a relatively new subject that is not currently available in the catalog, but is of great relevance to business administration. It may consist of lectures, reading, homework, presentation and project determined by the instructor. Can be taken repeatedly.

Prerequisite: Graduate Standing

**BA399 Graduate Research in Business Administration(3 credits)**

By arrangement with a research advisor. Conduct independent research of an approved topic in business administration. Can be taken repeatedly.

Prerequisite: Graduate standing



### **Tri-Valley University School of Art**

The School of Art at Tri-Valley University has degree programs and non-degree programs, primarily in Christian Ministry, with programs designed to prepare man and woman for biblically rich and culturally sensitive Christian Ministry at the modern world. The master level degree programs are Master of Art in Biblical Studies, Church History, Systematic Theology, Christian Counseling and Ministry. Doctor of Philosophy Degree is mainly focus on Doctor of Philosophy (Ph.D.) in Biblical Studies, Christina Counseling and Ministry. The Master of Art program requires a total of 36 graduate course and research work, and Doctor of Ministry requires a total of 60 course and research work. The graduate degree programs in Ministry are committed both to academic excellence and practical relevance, both to personal piety and social responsibility, such that the knowledge leaned, the spiritual nourishment developed and ministry skills strengthened through the programs are for the serve and glory of God.

- **Master of Art**
  - **Biblical Studies**
  - **Systematic Theology**
  - **Church History**
  - **Christian Counseling**
  - **Ministry**
- **Doctorate Degree (Ph.D.)**
  - **Biblical Studies**
  - **Christian Counseling**
  - **Ministry**
- **School of Art Courses**

Tri-Valley University  
School of Art

**Masters of Art Program**

**I. Objective of Program**

The primary objectives of the Master's Art program in Christianity are: (1) to teach God's Word and encourage students to become knowledgeable both in God's inerrant Word and competent in its interpretation, proclamation and application in the contemporary world. (2) to develop the skill of ministry—to develop in students a vision for God's redemptive work throughout the world and to formulate strategies that will lead to effective missions, evangelism, discipleship and expression of love for one another through ministries of compassion and social justice. (3) to cultivate the spiritual maturity in students for a personal intimate love relationship with God and further more evidenced by Christ-like character, value, outlook, conduct, compassion, faith, model and leadership in Church and society.

**II. Emphasis Areas**

The Master of Art in Christianity Degree program at Tri-Valley University mainly focuses on five concentration study areas:

MA Emphasis Area A:	Biblical Studies
MA Emphasis Area B:	Systematic Theology
MA Emphasis Area C:	Church History
MA Emphasis Area D:	Christian Counseling
MA Emphasis Area E:	Ministry

**III. Admission Requirements**

For admission to the Master of Art program, the applicant must have a bachelor's degree in Art, Business Administration, or Engineering fields with a minimum GPA of "3.0" or "B". Student who holds a B.S. degree in other fields other than Art need to consult the graduate advisor on taking the pre-required courses. The Master of Art in Christianity also requires student's spiritual commitment to Christ, emotionally suitable for Christian service and intellectually capable of rigorous academic discipline.

Students are allowed to transfer a maximum of nine (9) graduate semester units from another recognized institution towards the Master of Art degree program at TVU. The minimum required grade is B.



#### IV. Master of Art Curriculum

The total units required for Master of Art degree are 36 semester units of graduate courses and research work beyond the bachelor degree consisting of at least 30 units of course work and/or a maximum 6 units of research work. The 10 courses (30 trimester units) courses work are 5 (15 units) required courses as general requirement, 3 core courses (12 units) in the selected emphasis study area, 2 elective courses (6 units) from other area of emphasis (the elective course can from other engineering programs as well).

The 6 units of graduate research include two semester 3-unit graduate research work, with the guidance of a faculty member, leading to an approved M.S. thesis. Students can also choose to complete a M.S. project (3 units) combining with one more elective course. Therefore, there are two study plans for the Master of Art program, Plan I Thesis Plan requires 30 Unit of graduate course work and a M.S. thesis with 6 units research. Plan II Master Project includes 33 units of graduate course work and a 3 unit M.S. project.

A full-time student is able to complete the program in one year taking 4 courses each trimester. A part-time student needs to complete the program requirement within a maximum of 5 years in order to be granted the degree.

The 5 required courses (15 semester units) are:

CM312	Old Testament Study I	3 units
CM313	Old Testament Study II	3 units
CM314	Old Testament Study III	3 units
CM320	New Testament Study I	3 units
CM321	New Testament Study II	3 units

The 3 core courses are required from each emphasis study area (9 semester units):

MA Emphasis Area A:	Biblical Studies
MA Emphasis Area B:	Systematic Theology
MA Emphasis Area C:	Church History
MA Emphasis Area D:	Christian Counseling
MA Emphasis Area E:	Ministry

The 2 elective courses (6 units) can be from the same emphasis area or other emphasis areas in the different school program, such as Human Resource Management from School of Business. Master of Art Thesis Option requires 6 units of graduate research leading to an approved Master Thesis by a faculty member. Master Project Option requires 3 units of Master Project plus one more elective graduate course in art. Total requirement: 36 semester units (minimum 30 units of graduate course work).

<b>Master of Art Program Curriculum: Total 36 Semester Units</b>				
30 Units Course Work (10 Courses)			6 Units Research Work	
Required Course	Core Course	Elective Course	Master Thesis	Master Project
5 courses	3 Courses	2 Courses	CM399 (6 units)	CM 398 (3units)
15 Units	9 Units	6 Units		One elective course

Graduate courses in the five emphasis area are listed as follows:

**Master of Art Emphasis Area A: Biblical Studies**

Course #	Course Name	Core Course	Units
CM300	Bible Reading and Study	X	3
CM310	Introduction to Old Testament	X	3
CM311	History of the Old Testament	X	3
CM312	Old Testament Study I	X	3
CM313	Old Testament Study II	X	3
CM314	Old Testament Study III	X	3
CM320	New Testament Study I	X	3
CM321	New Testament Study II	X	3
CM322	Message and Life of Jesus;	X	3
CM373	Science and Christianity;	X	3

**MA Emphasis Area B: Systematic Theology**

Course #	Course Name	Core Course	Units
CM331	Introduction to Systematic Theology I	X	3
CM332	Introduction to Systematic Theology II	X	3
CM333	Systematic Theology I	X	3
CM334	Systematic Theology II	X	3
CM335	Systematic Theology III	X	3

**MA Emphasis Area C: Church History**

Course #	Course Name	Core Course	Units
CM340	Church History IA	X	3
CM341	Church History IB	X	3
CM342	Church History IC	X	3
CM343	Church History IIA	X	3
CM344	Church History IIB	X	3
CM345	Church History IIC	X	3
CM346	Church History IIIA	X	3
CM347	Church History IIIB	X	3
CM348	Women in Church History and Missionary	X	3

**MA Emphasis Area D: Christian Counseling**

Course #	Course Name	Core Course	Units
CM350	Biblical Counseling Foundation	X	3
CM351	Cognitive Psychology	X	3
CM352	Cross-cultural Counseling	X	3
CM353	Christian Marriage and Family Life;	X	3
CM354	Pastoral Counseling	X	3
CM355	Family Counseling	X	3
CM356	Career Development and Lifestyle	X	3
CM357	Principle of Psychology	X	3
CM358	Social Psychology	X	3
CM359	Emotional Intelligence Management	X	3

**MA Emphasis Area E: Ministry**

Course #	Course Name	Core Course	Units
CM360	Theology of Mission	X	3
CM361	Christianity Faith	X	3
CM362	Ministry and Missionary Life	X	3
CM363	Preaching: Principles and Practices	X	3
CM364	Sermon Preparation	X	3
CM365	Oversea Missions	X	3
CM366	Church Growth	X	3
CM367	Ministry Team Building	X	3
CM371	Images of God in Fantasy Literature;	X	3
CM372	Dramatic Preaching;	X	3
CM345	Women in Church History and Missionary	X	3
CM380	Seminar in Christian Ministry	X	3

**V. Master of Art Graduation Requirements**

For Master of Art degree, students need to complete total of 36 trimester units of graduate course and/or research work and maintain an overall grade point average (GPA) of 3.0.



## **Tri-Valley University**

### **School of Art Doctor of Philosophy (Ph.D.) in Ministry**

#### **❖ Objective**

The Doctorate Degree in Ministry (Ph.D.) at Tri-Valley University is a practice-oriented research-emphasized degree program developed to strengthen Christian leaders with theological, professional and personal integrity, and with sensitivities and capacities to cross barriers of race, class, culture and gender in Christian Ministry. The program is designed to equip student to meet intellectual challenge of Christian Ministry and to make practical applications on Ministry. The awarding of the Doctor Degree in Ministry signifies that the individual has completed the advanced academic requirements in Christian Ministry, attained specialized and practical competence which qualifies the recipient for opportunities and additional responsibilities beyond the Master degree level. The program prepares the scholar as a pastor, or leader and founder in Church and Christian Ministry worldwide.

There are three Major Fields of study for the Ph.D. in Ministry:  
Major Area A Biblical Studies  
Major Area B Christian Counseling  
Major Area C Ministry

#### **❖ Length of Study**

The doctorate degree normally is earned over three to five years or the equivalent. However the Ph.D. must be completed in no fewer than two years from the date of initial enrollment and no more than ten years from the date of initial enrollment.

## ❖ Admissions

### ➤ Admission Requirement

A Baccalaureate or Master's degree in the Biblical Study field, or a related field such as Art, Business administration, or Engineering earned at an appropriately accredited institution with a minimum GPA of "3.0" or "B" is required for admission to the Ph.D. program besides the admission requirement in the general admission requirement for doctorate program. For students admitted with a B.S. degree, they are required to take a total of 90 units of graduate course and research work. For students with a Master of Art degree admitted to the Ph.D. program, they only need to take a total of 60 units of graduate course and research work.

### ➤ Transfer of Credit.

A maximum of 12 units of credit for appropriate master's or doctorate-level course work from another accredited institution can be transferred towards the Ph.D. program at TVU. The minimum GPA requirement for transferred credit is B.

### ➤ Tuition and fee

Tuition and fee as well as refund policy for course work and research work for Ph.D. at TVU are the same as the tuition fee per units specified in the university general tuition and fee list. The graduation fee is \$100.00 for Ph.D. program when student complete the course and research work and file for graduation.

## ❖ Degree Requirement

The Ph.D. in Christina Ministry program gives students the in-depth principle Biblical knowledge and practical training in Christina Ministry area. The Ph.D. program at TVU requires both graduate course work and research work at a total of 60 units beyond Master of Art degree or 90 total graduate semester units after the baccalaureate degree. Among the 60 units, 15 units need to be graduate research work and 45 units of course work. The research work mainly involves practical ministry work, like clinical counseling, practicum ministry. Among the 45 graduate course work, at least 7 graduate courses need to from the Major Fields of study; 4 courses can be from another Minor field in the Christian Ministry area at the School of Art, and another 4 course need to be from Business Administration field in the School of Business as another Minor field. Most of the time, Church is first started as a non-profit organization. To prepare the scholar with the practical knowledge and technique of Church growth, and ministry team building, the graduate is required to take course in Business Administration area, such as Human Resource Management, Principle of Management, as the required minor. Student admitted into the Ph.D. program with a bachelor degree need to complete a total of 90 units of course and research work among which maximum 15 units can be graduate research. In general for graduate research, the Ph.D. study requires a Qualify exam and an approved dissertation.



### ➤ Course Work

The Doctor Degree in Christina Ministry program requires at least 45 units (15 courses) of course work beyond Master of Art degree in one major and two minor fields. One of the two minors must be from Business Administration area. Among the 15 required courses, 7 Courses (21 Units) need to be from the major program of study (one from the three areas in Christian Ministry), 4 course (12 units) from one minor field in Christian Ministry and one minor in Business Administration. Students admitted into DDM program with a baccalaureate degree need to complete a total of 25 courses (75 units) distributed in the specified major/minor field.

▪ Major Filed :	7 Courses	21 units
▪ Minor I: in Christian Ministry	4 Courses	12units
▪ Minor II: Business Administration	4 Courses	12 units

Total 45 units course work beyond Master of Art (Total 75 units after Bachelor Degree)

### ➤ Research Work

To be awarded the Ph.D., student is required to conduct practical research work in the field toward an approved dissertation. A total of 15 units research work under the guidance of a chair faculty member in the major filed are required.

- **Qualify Exam:** The dissertation should be based on original, or applied research. The topic of the dissertation shall be approved by the chair dissertation advisor. Prior to enter into doctorate research work, student needs to take a Qualify exam. There is no time requirement for a student admitted in Ph.D. program with a M.S. degree to take Qualify exam to start the research work. However, for student admitted into Ph.D. program with a baccalaureate degree need to complete minimum of 30 units graduate-level course work before taking the exam and starting the research. The Qualify Exam normally covers 3 areas of fundamental knowledge and in close book format for 6 hours, with 2 hours in each area. Student with a Master degree normally take the exam at the second tri-meter of enrollment. Student with a Bachelor degree normally can take the Qualify exam within the first year. If a student fails the first time, he/she can try another time. If he/she fails the second time, it will disqualify him/her to pursue the Ph.D. study.
- **Dissertation Committee:** For the doctoral degree, a supervisory dissertation committee of at least three faculty members must be formed for each student. At least one committee member must be from the major field serving as the chair dissertation advisor, and at least one committee member must be outside the major field. All committee members must have demonstrated appropriate scholarship, experience, or practice in the subject area. Students have the option of nominating their dissertation members or major professors for university final approve.

- An oral defense of the doctoral candidate's final project or dissertation with the dissertation committee is required. This may be conducted in person or at a distance. TVU will not award the Doctor Degree unless a majority of the dissertation committee approves the student's dissertation.

### ❖ Curriculum

The Doctor Degree in Christian Ministry program requires a total of 60 units of graduate study beyond Master of Art degree and a total of 90 units of graduate study after bachelor degree. The three major field of study in Christian Ministry and the major field course are listed as follows.

Major Area A     **Biblical Studies**  
 Major Area B     **Christian Counseling**  
 Major Area C     **Ministry**

<b>Ph.D. in Christianity (D.D.C.) Curriculum</b>			
45 Units Graduate Course Work (15 Courses)			15 Units Research Work
Major Field	Minor I	Minor II	An approved Dissertation & at least one publication (Conference or Journal paper)
7 courses	4 Courses	4 Courses	
21 Units	12 Units	12 Units	
<b>Total 60 Semester Units</b>			

Graduate courses in the three major areas are listed as follows:

#### Major Area A: Biblical Studies

Course #	Course Name	Core Course	Units
CM300	Bible Reading and Study	X	3
CM310	Introduction to Old Testament	X	3
CM311	History of the Old Testament	X	3
CM312	Old Testament Study I	X	3
CM313	Old Testament Study II	X	3
CM314	Old Testament Study III	X	3
CM320	New Testament Study I	X	3



CM321	New Testament Study II	X	3
CM322	Message and Life of Jesus;	X	3
CM331	Introduction to Systematic Theology I	X	3
CM332	Introduction to Systematic Theology II	X	3
CM333	Systematic Theology I	X	3
CM334	Systematic Theology II	X	3
CM335	Systematic Theology III	X	3
CM373	Science and Christianity	X	3

**Major Area B: Christian Counseling**

Course #	Course Name	Core Course	Units
CM350	Biblical Counseling Foundation	X	3
CM351	Cognitive Psychology	X	3
CM352	Cross-cultural Counseling	X	3
CM353	Christian Marriage and Family Life;	X	3
CM354	Pastoral Counseling	X	3
CM355	Family Counseling	X	3
CM356	Career Development and Lifestyle	X	3
CM357	Principle of Psychology	X	3
CM358	Social Psychology	X	3
CM359	Emotional Intelligence Management	X	3

**Major Area C: Ministry**

Course #	Course Name	Core Course	Units
CM360	Theology of Mission	X	3

CM361	Christianity Faith	X	3
CM362	Ministry and Missionary Life	X	3
CM363	Preaching: Principles and Practices	X	3
CM364	Sermon Preparation	X	3
CM365	Oversea Missions	X	3
CM366	Church Growth	X	3
CM367	Ministry Team Building	X	3
CM371	Images of God in Fantasy Literature;	X	3
CM372	Dramatic Preaching;	X	3
CM380	Seminar in Christian Ministry	X	3
CM340	Church History IA	X	3
CM341	Church History IB	X	3
CM342	Church History IC	X	3
CM343	Church History IIA	X	3
CM344	Church History IIB	X	3
CM345	Church History IIC	X	3
CM346	Church History IIIA	X	3
CM347	Church History IIIB	X	3
CM348	Women in Church History and Missionary	X	3

### ❖ Graduation Requirements

To be awarded the Doctor Degree in Ministry, students need to maintain an overall grade point average (GPA) of 3.0 in course work. For research, student needs to write a dissertation approved and signed by the dissertation committee members. To reflect the quality of the research, student is encouraged to have at least one publication at the conference or journal.

**Art in Christian Ministry Courses**

- CM300 -310 Fundamental classes**
- CM310-320 Old Testament**
- CM 320-330 New Testament**
- CM330-339 Systematic Theology**
- CM340-349 Church History**
- CM350-359 Christian Counseling**
- CM360-369 Ministry**
- CM370-370 Christian Course**
- CM380- Research**

**CM300 Bible Reading and Study (3 credits)**

The first course talks about how to read the Bible its historical, cultural, and literary context. Topics cover historiography in the Bible, Biblical prophecy, wisdom literature in the Bible, apocalyptic literature in the Bible, the letters of the New Testament, the essentials of a Christian life.

Prerequisite: Instructor's Consent

**CM310 Introduction to Old Testament (3 credits)**

The General introduction to issues in Old Testament study. Topics includes overview of Old Testament, inspiration and canonicity, interpretation (including classical and modern critical approaches), history, myth and poetry, prophets and prophecies, famous man and woman in OT, the significance of Old Testament.

Prerequisite: Instructor's Consent

**CM311 History of the Old Testament (3 credits)**

The course covers the Bible History of the Old Testament. Topics cover the world before the Flood, the exodus and the wanderings in the wilderness, Israel in Canaan under Joshua and the Judges, history of Israel under Samuel, Saul, and David and the Birth of Solomon, to the reign of Ahab, the two Kingdom to the Assyrian.

Prerequisite: Instructor's Consent

**CM312 Old Testament Study I (3 credits)**

The first course in the Old Testament Study series covers Old Testament reading and study from Genesis to 2 Kings. Topics briefly cover archaeology, history, cultural contexts, chronology, geography and interpretation.

Prerequisite: Instructor's Consent

**CM313 Old Testament Study II (3 credits)**

The second course in the Old Testament Study series covers Old Testament reading and study from 1 Chronicles to Lamentations (Lam). Topics briefly cover archaeology, history, cultural contexts, chronology, geography and interpretation.

Prerequisite: CM312

**CM314 Old Testament Study III (3 credits)**

The third course in the Old Testament Study series covers Old Testament reading and study from Ezekiel to Malachi. Topics briefly cover archaeology, history, cultural contexts, chronology, geography and interpretation.

Prerequisite: CM313

**CM320 New Testament Study I (3 credits)**

The first course in the New Testament Study series covers New Testament reading and study from Matthew to 2 Thessalonians. Topics briefly cover archaeology, history, cultural contexts, chronology, geography and interpretation.

Prerequisite: Instructor's Consent

**CM321 New Testament Study II (3 credits)**

The second course in the New Testament Study series covers New Testament reading and study from 1 Timothy to Revelation. Topics briefly cover archaeology, history, cultural contexts, chronology, geography and interpretation.

Prerequisite: CM320

**CM322 Message and Life of Jesus; (3 credits)**

A study of the complementary portraits of Jesus in the four gospels to determine the events of his life, the content of his message, and his understanding of his own person and mission.

Prerequisite: Instructor's Consent

**CM331 Introduction to Systematic Theology I; (3 credits)**

This is an introductory course to systematic theology. Topics cover the Theology: the study of God; Biblioply: The Study of the Bible; Anthropology: The Study Of Man; Soteriology.

Prerequisite: Instructor's Consent

**CM332 Introduction to Systematic Theology II; (3 credits)**

This is the second course of the introduction to systematic theology series. Topics cover The Study of Salvation; Pneumatology: The Study the Holy Spirit; Eschatology: The Study of the Future;

Prerequisite: CM331

**CM333 Systematic Theology I; (3 credits)**

The first course of the systematic theology series focuses on the Doctrine of God. Topics cover God's existence, the scripture, a revelation from God; the nature, decrees and word of God.

Prerequisite: Instructor's Consent

**CM334 Systematic Theology II; (3 credits)**

The second course of the systematic theology series focuses on the Doctrine of Man and the Doctrine of Salvation through the work of Christ and Holy Spirit.

Prerequisite: CM333

**CM335 Systematic Theology III; (3 credits)**

The third course of the systematic theology series focuses on the Doctrine of Church and the Doctrine of Final things.

Prerequisite: CM335

**CM340 Church History IA; (3 credits)**

The first Church History series focuses on History of Ancient Christianity including the first period the Church under the apostles; the Middle age, the ante-Nicene Christianity and the third period. The IA focus on the first period (A.D. 1-100). Topics cover Jesus Christ, St. Peter and conversion of the Jews, St. Paul and the conversion of the Gentiles, the great tribulation, St. John and the last stadium, Christian life and worship in the Apostolic age, organization and theology of the Apostolic Church.

Prerequisite: Instructor's Consent

**CM341 Church History IB; (3 credits)**

The first Church History series focuses on History of Ancient Christianity including the first period the Church under the apostles; the Middle age, the ante-Nicene Christianity and the third period. The IB focuses on the Middle age- the ante-Nicene Christianity (A.D. 100-311). Topics cover persecution of the Christianity, organization and discipline of Church, Christian worship, Christina art, church in the catacombs, Ascetic tendencies, montanism, development of the catholic theology; and eventful period of Christian emperors.

Prerequisite: CM340

**CM342 Church History IC; (3 credits)**

The first Church History series focuses on History of Ancient Christianity including the first period the Church under the apostles; the Middle age, the ante-Nicene Christianity and the third period A.D. 311-590, with IC focusing on the third period. Topics cover downfall of heathenism and victory of Christianity in the roman empire, the rise and progress of monasticism, church discipline and schisms, the hierarchy and polity of the church, from Constantine the Great to Gregory the Great.

Prerequisite: CM341

**CM343 Church History II A; (3 credits)**

The second Church History series covers the mediaeval Christianity, from Gregory I to Gregory VII, the middle age, from Gregory VII to Boniface VIII, from Boniface VIII to the Protestant reformation. II A focuses on the Mediaeval Christianity from Gregory I to Gregory VII, A.D. 590-1073. Topics cover Conversion of the Northern and Western Barbarians, the Papal Hierarchy and the Holy Roman Empire, the Conflict of the eastern and Western Churches and Their Separation, Morals and Religion, Church Discipline, Church and State, Worship and Ceremonies, Heretical Sects etc.

Prerequisite: CM342

**CM344 Church History II B; (3 credits)**

The second Church History series covers the mediaeval Christianity, from Gregory I



to Gregory VII, the middle age, from Gregory VII to Boniface VIII, from Boniface VIII to the Protestant reformation, with IIB focusing on the middle age, from Gregory VII, 1049, to Boniface VIII, 1294. Topics cover Gregory VII, The Papacy from the concordat of worms to innocent III, A.D. 1122-1198, Innocent III and his age, A.D. 1198-1216, The Crusades, The Monastic Orders, Missions, Heresy and its Suppression, Universities and Cathedrals, Scholastic and Mystic Theology, Scholasticism at its height, the Sacramental System.

Prerequisite: CM343

**CM345 Church History II C; (3 credits)**

The second Church History series covers the mediaeval Christianity, from Gregory I to Gregory VII, the middle age, from Gregory VII to Boniface VIII, from Boniface VIII to the Protestant reformation, with IIC focusing on the middle age, from Boniface VIII to the Protestant reformation, 1294-1517. Topics cover the Decline of the Papacy and the Avignon Exile, A.D. 1294-1377, the Papacy Schism and the Reformatory Councils, 1378-1449, Leaders of Catholic Thought, The German Mystics, The Last Popes of the Middle Ages 1447-1521, The Renaissance, The Pulpit and Popular Piety and the close of the Middle Ages.

Prerequisite: CM344

**CM346 Church History III A; (3 credits)**

The third Church History series covers the modern Christianity, from German reformation to the Swiss Reformation, with III A focusing on the German reformation (1517-1648). Topics include Luther's Training for the Reformation, A.D. 1483-1517, The German Reformation from the Publication of Luther's theses to the Diet of Worms, The Propagation and Persecution of Protestantism in Germany, The Political Situation between 1526-1529.

Prerequisite: CM345

**CM347 Church History III B; (3 credits)**

The third course in Church History series covers the modern Christianity, from German reformation to the Swiss Reformation, with III B focusing on the Swiss Reformation. Topics include Reformation in Zurich 1519-1526, The Civil War Between the Roman Catholic and Reformed Cantons The Period of Consolidation; The Preparatory Work, 1526-1536, John Calvin and his Work, Constitution and Discipline of the Church of Geneva, The Calvin's Theology, Servetus: His Life, Opinions Trial and Execution.

Prerequisite: CM346

**CM348 Women in Church History and Missionary; (3 credits)**

The contributions, roles, struggles, writings, and spirituality of women from Pentecost to the present. Students explore a variety of biblical and historical patterns for women in religious leadership, and work with questions touching women's ordination in the light of various contemporary denominational practices.

Prerequisite: Instructor's Consent

**CM350 Biblical Counseling Foundation**

A foundational course that introduces basic concepts of counseling and emphasizes the use of scripture in such areas as purpose and goals, roles and relationships, personal and interpersonal issues, family and identity. Topics include Biblical Psychology, Biblical Discipleship etc.

Prerequisite: Instructor's Consent

**CM351 Cognitive Psychology; (3 credits)**

Cognitive Psychology is the scientific study of the human mind and how it processes information; the mental processes underlying our ability to perceive the world, understand and remember our experiences, communicate with others, alter our feelings and control our behavior. The course deals with theoretical assumptions and practical aspects. Research and clinical practice are drawn and integrated into the concrete applications of cognitive psychology.

Prerequisite: Instructor's Consent

**CM352 Cross-Cultural Counseling;**

This course gives an overview of considerations in conducting therapy with those of different cultural backgrounds and psychological foundation of culture. Emphasis is given to family roles, structures and functions, and to the context in which individuals develop and relate.

Prerequisite: Instructor's Consent

**CM353 Christian Marriage and Family Life;**

A Christian view of marriage and family is developed by applying biblical principles. Participants explore family life cycle theory, Christian perspectives on preparation for, and enrichment of, marriage and the management of common family crises.

Prerequisite: Instructor's Consent

**CM354 Pastoral Counseling and Pastoring; (3 credits)**

This course provides sage advice on and covers the wide array of tasks a pastor must perform and provide the basic preparation for the complex task of pastoral care and counseling. Topics include Pastoral care and counseling, pastor's pulpit ministry, problem-solving preaching, pastoral leadership, conflict management, ministerial ethics, pastor as a teacher, an evangelist, and the pastor's personal life.

Prerequisite: Instructor's Consent

**CM355 Family Counseling; (3 credits)**

A review of the major theories of family systems development with emphasis on a critical analysis of these theories from Christian perspective. An examination of the social, cultural, religious, educational, economic and family lifestyle patterns as a preparation for effective counseling in varied settings. Basic theories of marital therapy with particular attention to biblical and theological issues.

Prerequisite: Instructor's Consent

**CM356 Career Development and Lifestyle; (3 credits)**

An overview of the process of evaluation and counseling persons in choosing a career path. A variety of evaluation instruments will be studied and utilized as the application component of this course.

Prerequisite: Instructor's Consent

**CM357 Principle of Psychology; (3 credits)**

This course covers the principles of psychology. Topics include principle of psychology, function of brain, habit, mind, imagination, sensation, reasoning, instinct, emotion etc.

Prerequisite: Instructor's Consent

**CM358 Social Psychology; (3 credits)**

This course provides an introduction to social psychology. Topics cover the Mental Characters of Man of Primary Importance for His Life in Society and the Operation of the Primary Tendencies of the Human Mind in the Life of Societies.

Prerequisite: Instructor's Consent

**CM359 Emotional Intelligence Management; (3 credits)**

This course focuses on emotional intelligence management and how to develop the key emotional skill for leadership. Topics cover understanding, develop and apply the emotional skills with details of a four-part hierarchy of emotional skills: identifying emotions, using them to facilitate thinking, and understanding and managing emotions.

Prerequisite: Instructor's Consent

**CM360 Theology of Mission; (3 credits)**

This course give a biblical theological introduction to mission. Topics include: the biblical basis for missions, the relationship of social action to evangelism, mission and development, and the relation of Christianity to other religions.

Prerequisite: Instructor's Consent

**CM361 Christian Faith; (3 credits)**

This course will examine the essential of Christianity faith. Topics includes revelation, the nature, attributes, work and decrees of God, Jesus Christ, The Holy Spirit, Trinity, Human being and the fall, salvation, the church and sacraments, spirituality and living in this age.

Prerequisite: Instructor's Consent

**CM362 Ministry and Missionary Life; (3 credits)**

Through reading missionary biographies, class discussions, lectures, interviews with experienced missionaries and projects, students consider the spiritual, financial, physical, emotional and interpersonal issues involved in living and ministering in an intercultural setting. Married students encouraged to take the course with spouse.

Prerequisite: Instructor's Consent

**CM363 Preaching: Principles and Practices; (3 credits)**



An introduction to the principles of preparing relevant biblical sermons. Lectures and exercises cover a stage-by-stage explanation of how preachers think as they prepare to preach. Recitation sessions provide opportunity for students to preach with critique by the professor.

Prerequisite: Instructor's Consent

**CM364 Sermon Preparation; (3 credits)**

This course focus on the integration of exegesis and sermon preparation from Biblical text to sermon manuscript, with attention to outlining the sermon, use of illustrations, and criteria for legitimate application of the text in the modern world.

Prerequisite: Instructor's Consent

**CM365 Oversea Missions; (3 credits)**

Orientation for students planning to minister inter-culturally with the Overseas Missions Practicum. Topics include: Biblical theological basics; language study; cultural anthropology; and the history, culture, etc. of the country/group among whom the student plans to minister with a focus on the particular theological, cultural and linguistic challenge posed by Ministry in China.

Prerequisite: Instructor's Consent

**CM366 Church Growth; (3 credits)**

This course gives a practical and biblical-theological perspective on planting; development and administrating of churches Students develop competencies in leading and administering programs, especially in the local church. Students explore such issues as: training others for leadership; organizing, supervising and evaluating programs; basic financial management. A practical and biblical-theological perspective on planting and development of churches. Research projects concentrate on sharpening skills in planning, establishing and nurturing churches which will equip members for ministry to their communities, and for continued planting of new churches.

Prerequisite: Instructor's Consent

**CM367 Bible Leadership;**

This course focus on the Bible leadership examples and wisdom therefore provides a biblical foundation concerning effective leadership as well as cover the critical keys necessary for a leader to be effective both personally and organizationally. Topics include honesty and integrity, purpose, kindness and compassion, humility, communication, performance management, team development, courage, justice and fairness and leadership development.

Prerequisite: Instructor's Consent

**CM368 Ministry Team Building;**

The purpose of this course is to help students, as potential team members and leaders, to appreciate the theological and managerial rationale for the use of teams in ministry. In addition, they will acquire and develop the philosophy and skills needed to sustain an effective ministry team. Key principles, strategies and interaction will facilitate

the learning process. Students will also be exposed to the functions of teamwork, recruitment, team formation, barriers to team building, and key principles of conflict management.

Prerequisite: Instructor's Consent

**CM371 Images of God in Fantasy Literature; (3 credits)**

Focuses upon understanding the nature of God through the reading of the Bible and of fantasy literature by such authors as George MacDonald and C.S. Lewis. The student will be introduced to the nature of fiction and images.

Prerequisite: Instructor's Consent

**CM372 Dramatic Preaching; (3 credits)**

An Students will learn how to preach dramatic expository sermons and learn how to unleash the power of the stories of Scripture. The focus will be on both the "why" and "how" of dramatic preaching. Students will preach in class.

Prerequisite: Instructor's Consent

**CM373 Science and Christianity; (3 credits)**

This course shows how science and Christianity can integrate together in harmony. Topics cover the historic alliance between sciences and Christianity, evolution, modern science and creation. A scientist's view of the relationship between theology and science will be studied, including particular philosophical prejudices many scientists have when considering the Bible.

Prerequisite: Instructor's Consent

**CM 380 Seminar in Christian Ministry (3 credits)**

The Seminar in Christina ministry invites the world famous evangelist to share their vision and word of God.

Prerequisite: As specified in class schedule

**CM 390 Special Topics in Christian Ministry (3 credits)**

The course provides an opportunity for a faculty member or a visiting scholar to offer a relatively new subject that is not currently available in the catalog, but is of great relevance to Christian ministry. It may consist of lectures, reading, homework, presentation and project determined by the instructor.

Prerequisite: As specified in class schedule

**CM 399 Graduate Research in Christian Ministry (3 credits)**

By arrangement with a research advisor. Conduct independent research of an approved topic in business administration. Can be taken repeatedly.

## **VI. Non-Degree Programs**

Tri-Valley University's non-degree programs are Certificate Program and Open Enrolment Program.

### **Certificate Program**

#### **(I). Program Description**

The certificate program is one of the non-degree programs that Tri-Valley University offers. For each department, there is a Certificate Program in the emphasis area of study which requires less course and research load. The Certificate Program aims to provide the practice and professional training in the specific area. The Certificate Program only requires 4 courses, equivalent to 12 semester units. Among the 4 courses, two need to be from the required course, the other two from the core course listing. The required course and core course lists are referred to the M.S. curriculum listing in each department's emphasis area.

#### **(II). Program Requirements**

##### **1. Prerequisites**

A degree in engineering or equivalent knowledge acquired through training and experience in the specific engineering area is required.

##### **2. Certificate Requirements**

To obtain the certificate in engineering, a total of 4 courses are required. Among the 4 courses, 2 courses need to be chosen from requirement courses while the other two need to be from the core course list. The required course and core course lists are referred to the M.S. curriculum listing in each department's emphasis area.

Complete a total of 4 graduate courses in Business Administration including 2 courses in the emphasis area and 3 elective courses will receive a certificate in the specific five concentrated areas:

##### **3. Certificate Program Areas**

There are total of nine areas of Certificate Programs in Engineering

- Area 1 Analog IC Design
- Area 2 Digital IC Design
- Area 3 Nanotechnology
- Area 4 Software Programming
- Area 5 VLSI System

- Area 6 Data Mining
- Area 7 Mechanical Design
- Area 8 Engineering Mechanics
- Area 9 Micro-Electro-Mechanical System (MEMS)

The specific five concentrated areas of Certificate in Business:

- Area A: Accounting
- Area B: Finance
- Area C: Marketing
- Area D: Economics
- Area E: Business Administration

The specific six concentrated areas of Certificate in Art:

Area A	<b>Old Testament</b>
Area B	<b>New Testament</b>
Area C	<b>Systematic Theology</b>
Area D	<b>Church History</b>
Area E	<b>Christian Counseling</b>
Area F	<b>Ministry</b>

## **Open Enrolment Program**

Tri-Valley University distance learning facility makes its graduate course work available to the global audience through the Skype.

People from different countries around the world can register the courses in a specific area field and attend the live virtual classroom to hear what the expert people in the subject have to say. The Open Enrollment is for this purpose, and the registration is handled through the Tri-Valley University's Website.

The registration fee for each class is \$20.00 and is non-refundable. After successful registration of the class and payment of the registration fee and tuition for the classes, an E-mail will be sent to you specified E-mail address on how to download the required software and how to access the virtual classroom. Audience may be from worldwide, and attend the live classroom for lecture, and questions, discussions. Classroom attendance is mandatory.

## **VII. Facilities**

### **Library Resources**

TVU has always sought to increase the vast reference support and library resources made available to students, particularly our Doctors Degree students who need the most up-to-date research data, most commonly found in expensive subscription-based computer databases. Currently TVU owns an e-library with more than 10000 of e-books. With a purchase of e-library card, student can download the pdf file of the e-books to their computer.

### **Computer Labs**

Computer facilities include 13 laptops. Computer facilities include Synopsys, IC Design Lab and Xilinx Lab, Networking and Software Testing Lab with full wireless Internet connections. The labs are open from 1:00 PM to 10:00 PM Monday through Friday, and limited hours on Saturday and Sunday. Please check with the Registrar for current access hours during each particular term. The use of computers at TVU is an integral element of all programs. All students are highly encouraged to purchase and bring in their own laptop computers with software necessary as determined by instructors.

### **Research Labs**

Tri-Valley University has three research directions and labs: VLSI Lab, MEMS Lab and Data Mining. For the research projects in each lab, please refer the website of each research lab for more information.

## **VIII. Student Activities and Services**

### **Placement Assistance**

TVU provides a variety of services to assist students in clarifying, planning, and achieving their career goals. Workshops will be held regularly on career planning, including self-assessment, resume writing, interviewing skills, and job search strategies. Programs will be developed that bring professionals from various fields to present information concerning career opportunities weekly in the Joint Seminar class required of all students. Students are encouraged to take advantage of this exposure to industry leaders and continually collect networking contact information from the Joint Seminar class. A special program of informational interviewing will link students with alumni in a variety of fields.

### **Student Health, Safety, and Housing**

All full-time students are required to have their own medical insurance coverage. TVU will assist them in contacting appropriate insurance companies. The University does not provide on-campus housing for students. However, students should not have difficulty in finding accommodations near campus. Average monthly rent of a single room ranges from \$400-\$550.

### **Student Governance**

The TVU Student Association offers students the opportunity to participate in the governing of the institution. Elected officers interact regularly with assigned faculty advisors to coordinate student functions, organize extra-curricular activities, and offer student input concerning university policy.

### **Student Organizations and Alumni Association**

Students at TVU are free to organize and to join associations whose stated purpose is consistent with the University's mission. All student organizations seeking TVU support must be registered. The TVU Alumni Association is operated under the Chancellor's Office of the University, keeping a current list of all alumni, and conducting alumni activities on a regular basis such as class reunions and career counseling.

### **Academic Achievement Recognition**

Faculty and student awards are given annually during commencement ceremonies to recognize the outstanding achievements of faculty, staff, and students.

### **Tutorial Programs**



A tutorial program will provide international students with assistance in English studies in addition to TVU's regular tutorial classes for academic courses conducted by our teaching faculty and teaching assistants.

#### **Nonimmigrant Alien Student Services**

Nonimmigrant alien students requesting supporting documents must submit a financial statement showing adequate funds for tuition fees and living expenses for the entire degree program (no less than USD \$13,000).

An acceptance letter together with the supporting documents will be issued to an admitted nonimmigrant alien student, who must submit these and the necessary financial affidavits to a U.S. Consular Officer to whom he/she applies for a student visa.

The Bureau of Citizenship and Immigration Services dictate that a nonimmigrant alien student must enroll as a full-time student at the university issuing the supporting document. In order to ensure that this policy is observed, a prospective student is required to make a deposit of USD \$500. This deposit will be deducted from the student's tuition fees upon registration.

All enrolled nonimmigrant alien students cannot miss more than 15 percent of their classes without endangering their visa status. Students are allowed only 3 unexcused absences. If a student misses two consecutive classes, the student will receive a warning. If the situation persists, the director of the program will contact the student. If it continues, it will be referred to the President's Office. If the problem remains, TVU is required to report this to the Bureau of Citizenship and Immigration Services.

## VIII. Faculty

### Information for faculty

Tri-Valley University's faculty members are from both academic and industrial background including both academically qualified and professionally qualified faculty members. Many faculty members are renowned experts and professionals in the field and have many years of industrious experience on the subject.

Due to the nature of Doctorate Degree Program at Tri-Valley University, most of the courses are taken by the doctorate candidates, therefore the minimum threshold for an instructor or faculty member at Tri-Valley University is to hold a doctorate or Ph.D. degree in the engineering field. However, there are people who only have a M. S. degree but with many years of industry experience and are true experts on the subject, they can offer a class on the subject at Tri-Valley University as a Teaching Associate (TA, different from Teaching Assistant). Tri-Valley University strongly encourages and recommends our Teaching Associate to earn a Doctorate Degree here at TVU while teaching. Even though teaching experience is not a requirement for the degree in the Doctorate Degree curriculum, the Teaching Associate experience can be counted toward the research credit for the doctorate degree requirement.

Instructors at Tri-Valley University are normally paid \$50-\$120/hour for on-site class depending on the qualification. For on-line enrollments and classes, instructors are paid 25% of the tuition.

Besides the faculty member who directly involved with classroom instruction, TUV also have participating faculty members who actively engage in the activities of the school in matters beyond direct teaching responsibilities, such as policy decisions, educational directions, advising, research, and service commitments. The faculty members participate in the governance of the school, and serve as a member on graduate thesis and dissertation committees, and participate in a variety of non-class activities such as directing extracurricular activity, providing academic and career advising, and representing the school on institutional committees. The school considers the faculty member to be a long-term member of the faculty regardless of whether or not the appointment is of a full-time or part-time nature, regardless of whether or not the position with the school is considered the faculty member's principal employment, and regardless of whether or not the school has tenure policies as state in the accreditation standard. As a matter of fact, majority of TVU faculty member are primarily employed by major industry companies.

To become an instructor at Tri-Valley University, the first step to apply is to fill and mail us (E-mail: [tvu\\_faculty@trivalleyuniversity.org](mailto:tvu_faculty@trivalleyuniversity.org)) the instructor's bio form. We will then schedule a phone and on-site interview. The on-site interview includes giving a presentation—either research-orientated or to choose a subject topic to teach. The accepted candidate will finally be given a Tri-Valley University course site instructor's ID and password to develop his/her course for enrollment. All faculty members are also required to list three research specialization areas, from which student can choose as major research advisor or



dissertation committee.

Tri-Valley University's courses website can be found at web address: (<http://trivalleyuniversity.org/moodle/>). Faculty member at Tri-Valley University is encouraged to develop his/her website besides including pictures and short-bios the class website. All information for faculty can be found at website: [http://trivalleyuniversity.org/faculty\\_infor.htm](http://trivalleyuniversity.org/faculty_infor.htm).

Faculty members are the most important resource for the quality of the teaching program of the school, therefore are personally responsible for bringing current and relevant intellectual resources into the teaching program. Each faculty member, thus, is obligated to continuously update, expand, and hone personal knowledge and skills.

Faculty members are encouraged to be involved in continuous development throughout their careers to stay current, such as engaging in constant learning activity to maintain currency with their fields' developing research and theory. Regardless of their specialty, work experience, or graduate preparation, faculty members need to maintain their competence through efforts to learn about their specialty and how it is applied in practice. To keep currency and relevance, TVU has developed several faculty members training class in the Moodle platform. These include the complete training sections all the Moodle features for new faculty members. There are many activities that faculty members may undertake to maintain their disciplinary currency and relevance, such as participating in conference, publish academic papers, consulting, faculty internships, other professional experiences, and/or professional development activities.

## Faculty Members

### School of Engineering

#### Susan Su Ph.D.

Ph.D., University of California, Berkeley, 2001  
M.S., University of California, Davis, 1997  
B.S., Tsinghua University, China, 1991  
Specialization: *Design, VLSI, Analog*

#### Xiaogang Su Ph.D.

Ph.D., University of California, Davis, 2001  
M.S., University of California, Davis, 1997  
B.S., Beijing Normal University, China, 1995  
Specialization: *Data Mining, Bio-Statistics, Software Programming*

#### Pierte Roo Ph.D.

Ph.D., University of California, Davis, 1998  
B.S. University of California, Davis. 1990  
Specialization: *Analog, VLSI, Design*

#### Jun Ming Ph.D.

Ph.D., University of California, Davis, 1999  
M.S., Huazhong University of Science and Technology, 1992  
B.S., Huazhong University of Science and Technology, China, 1989  
Specialization: *Analog, VLSI, Optics,*

#### Ningning Zhou Ph.D.

Ph.D., University of California, Berkeley, 2002  
M.S., Xian Transportation University, China, 1993  
B.S., Xian Transportation University, China, 1990  
Specialization: *MEMS, Design, Programming*

#### DanPing Peng Ph.D.

Ph.D., University of California, Las Angles, 1999  
M.S., Beijing University, China, 1991  
B.S., Beijing University, China, 1988  
Specialization: *Software Programming, Design, Mathematics*

#### Henry Yang Ph.D.

Ph.D., University of Birmingham, U.K. 1989  
M.S., University of Birmingham, U.K. 1987  
B.S., Harbin Institute of Technology, China, 1984  
Specialization: *PVD, Material, Design*

**Gary Fan Ph.D.**

Assistance Professor, University of California San Diego  
Ph.D., Arizona State University 1987  
B.S., Wuhan University, China, 1982  
Specialization: *IC Process, Semiconductor Device, Physics*

**Minmin Qin Ph.D.**

Post-Doc, University of California, Berkeley, 1992-1997  
Ph.D., University of Wisconsin of Medicine 1991  
B.S., Northwest University of Agriculture, China, 1981  
Specialization: *Bio-MEMS, PCR, Microfluidics*

**Hao Luo Ph.D.**

Ph. D. Carnegie-Mellon University, 2003  
M. S. Carnegie-Mellon University, 2001  
B.S. Tsinghua University, 1994  
Specialization: MEMS, PCB, Hardware

**Chi Jing Ph.D.**

Ph.D. Carnegie-Mellon University, 2003  
M.S. Tsinghua University, 1997  
B.S. Tsinghua University, 1994  
Specialization: MEMS, Simulation, FPGA

**Linming Jin Ph.D.**

Ph.D. Santa Clare University, 1991  
M.S. The City University, London, U.K. 1986  
B.S. Tianjing University, 1978  
Specialization: ASIC, Simulation, Verification

**Karl F. Scheibner Ph.D.**

Ph.D. University of Colorado, Boulder, 1983  
B.S. Graceland University, 1976  
Specialization: Math, Computer Science, Bio-MEMS

**A. Miller Allen Ph.D.**

Ph.D. University of California, Berkeley, 2002  
M. S. University of California, Berkeley, 1995  
B.S. University of California, Berkeley, 1993  
Specialization: MEMS, Slid Mechanics, Dynamics

**Mengqi Ye Ph.D.**

Ph.D. University of California, Berkeley, 2000  
M. S. University of California, Berkeley, 1998  
B.S. China Institution of Science and Technology 1994

Specialization: Laser, PVD, Thin film

**Xianmin Tong Ph.D.**

Ph.D. College of William and Mary, 2000

M.S. College of William and Mary, 1997

B.S. Huazhong University of Science and Technology, China, 1989

Specialization: PVD, Physics, Material

**Bhaskar L. Mantha Ph.D.**

Ph.D. EE University of Cincinnati, Ohio, 1979

M.S. EE University of Cincinnati, Ohio, 1976

B.S. Osmania University, Hyderabad, India, 1972

Specialization: Device, Semiconductor Process, Memory

**School of Business Faculty Members:**

**Mae Jean Go Ph. D.**

Ph.D. & M.A. Speech Communication, University of Illinois, 1982

M.S., Management of Technology, Golden Gate University, 2002

B.S., Speech Communication, University of Tennessee at Knoxville, 1975

Specialization: *Technology Management, IT Management, Speech Communication*

**Fred Dalili Ed.D.**

Ed.D. in Higher Educational Administration, University of Akron, OH, 1985

M.A. in Higher Educational Administration, University of Akron, OH, 1981

B.A. in Public Relations and Advertising, College of Communication, 1972

Specialization: Business Administration, Project Management, Multicultural Management

**Nik Tehrani, Ph.D.**

Ph.D. in Business Administration, Northcentral University, Prescott, AZ, 2008

M.B.A. in Executive Management, Pepperdine University Malibu, CA, 1999

B.A. in Electrical Engineering, Cogswell Polytechnic College, Sunnyvale, CA, 1996

Specialization: E-Commerce, Marketing Management, Economic

**Dr. Danilo Gonzalez**

Doctorate of Management in Organizational Leadership, University of Phoenix 2008

M.A., Organizational Management University of Phoenix 2000

B.S., Business Management University of Phoenix 1998

Specialization: Finance and Accounting, Business Management, Organizational Leadership

Instructors in some of the practical areas may only have MBA degree, but with license in the subject field and many years of industry practice.

**Kuang Chen MBA**

MBA Emphasis, Information technology, University of Illinois, 1980

Specialization: *Information Technology*

**Wendy Wei CPA**

Master of Science in Business Administration, Emphasis: Accounting,  
San Francisco State University, 1999

Master of Art, Beijing Foreign Studies University, 1995

Bachelor of Art, Beijing Foreign Studies University, 1992

Specialization: *Accounting*

**School of Art Faculty Members:**

**Ke Han Ph.D.**

Ph.D., University of California, Davis, 1996

M.S., Chinese Academy of Sciences, 1990

B.S., China Institution of Science and Technology 1987

Specialization: *DSP, Control, Ministry*

**University Administration**

**Dr. Susan Xiao-Ping Su**  
*President CEO*

**Dr. Xiao-Gang Su**  
*Vice-President CFO*

**Dr. Farid Dalili**  
*Vice-President of Academic Affair (Interim)*

**Ms. Sophie Su**  
*Record Offices and Registrar, Librarian*

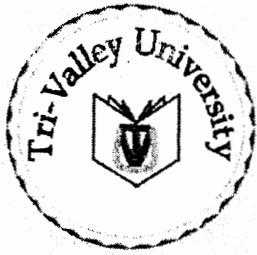
**Mr. Vince Wang**  
*Webmaster & Registrar*

**Ms. Lisa Luo**  
*Financial officer and Accounting*

**Ms. Zoe Sun**  
*Librarian Staff & Student Affairs*

**Mr. Krishna Chaitanya**  
*Lab Assistant*

**Mr. Robert Dong**  
*Director of International Relationship*



## Tri-Valley University

4455 Stoneridge Drive  
Pleasanton CA 94588

<http://trivalleyuniversity.org>

E-mail: [tvu@trivalleyuniversity.org](mailto:tvu@trivalleyuniversity.org)  
Tel: 925 202 9538 Fax: 925 462 1055

Mr. Barry Kobe  
SEVIS Student and Exchange Visitor Program  
Potomac Center North  
500 12th Street SW  
Washington, DC 20524  
E-mail: [barry.kobe@DHS.gov](mailto:barry.kobe@DHS.gov)  
Tel: 703 603 3453

Dr. Susan Su, President  
Tri-Valley University  
4455 Stoneridge Drive,  
Pleasanton CA 94588  
Feb. 10<sup>th</sup>, 2009

Dear Mr. Kobe,

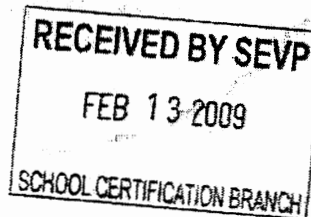
Per our phone conversation, here are the originals of the 3 Articulation Agreements.

Please let me know if you have further questions or need anything else in order to complete the adjudication of our I-17 petition.

Best Regards;

A handwritten signature in cursive script that reads "Susan Xiao-Ping Su".

Susan Xiao-Ping Su  
President  
Tri-Valley University







**Tri-Valley University  
and  
University of East West Medicine  
Articulation Agreement**

**THIS ARTICULATION AGREEMENT**, dated this 2nd day of February 2009, is made by and between, Tri-Valley University hereinafter called "TVU", and University of East West Medicine, hereinafter called "UEWM". TVU and UEWM acknowledge their shared missions to provide quality higher education which meet the needs of the region and provide a workforce of highly trained professionals. The primary purpose of this agreement is to establish and enhance the mutual course transferability between the two institutions.

**I. PRINCIPLES OF AGREEMENT**

UEWM has been accepting 5 graduate courses transferring from TVU and establishing research collaboration with TVU since 18<sup>th</sup> of April, 2008. The primary context of this Articulation Agreement is to establish the mutual course transferring relationship between all TVU and UEWM courses. On the mutual review and evaluation of the two institution's School of Medicine and all academic programs, UEWM will continue to unconditionally accept all courses transferring from Tri-Valley University, the entire institution. TVU will also accept all courses transferring credit from UEWM. The minimum grade for both transferring course is "C".

**II. ACCREDITATION STATUS OF UEWM AND TVU**

The professional Master's degree programs of the University of East-West Medicine are accredited by the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM). The University of East-West Medicine is approved to operate the Master of Science Degree in Traditional Chinese Medicine under the High Education Act (HEA) of 1965 by the US Department of Education. The California Bureau for Private Post-secondary and Vocational Education (BPPVE) has granted the University of East-West Medicine formal approval to award Doctor of Acupuncture and Oriental Medicine (DAOM). More Accreditation of UEWM can be found at: <http://www.uewm.edu/aboutuewm/accreditation.html>.

Tri-Valley University, the entire institution has submitted application for Accreditation Candidacy Status to Transnational Association of Christian Colleges and Schools (TRACS). TRACS is recognized by both the United States Department of Education, the Council for Higher Education Accreditation, and is a member of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE).

**III. MUTUAL TERMS AND CONDITIONS**

**A. Term of the Agreement.** This agreement shall be in effect for five (5) years from the date of signature and will be reviewed annually for accuracy.



**B. Termination of the Agreement.** TVU and UEWM may terminate this Agreement for any reason or no reason with ninety (90) days written notice from either party. Either party may terminate this Agreement in the event of a substantial breach.

**C. Non discrimination.** The parties agree to continue their respective policies of nondiscrimination based on Title VI of the Civil Rights Act of 1964 in regard to sex, age, race, color, creed, national origin, Title IX of the Education Amendments of 1972 and other applicable laws, as well as the provisions of the Americans with disabilities Act.

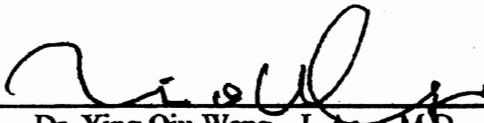
**D. Modification of Agreement.** This Agreement shall only be modified in writing with the same formality as the original Agreement.

**E. Liability.** Neither of the parties shall assume any liabilities to each other. As to liability to each other, or damages to property, the parties do not waive any defense as a result of entering into this contract. This provision shall not be construed to limit the Commonwealth's rights, claims or defenses which arise as a matter of law pursuant to any provisions of this contract. This provision shall not be construed to limit the sovereign immunity of the Commonwealth or of the State System of Higher Education or the University.

**F. Entire Agreement.** This Agreement represents the entire understanding between the parties. Any changes, corrections or additions to this contract shall be in writing in the form of a supplemental agreement signed by all necessary parties and setting forth therein the proposed change, correction, or addition.

**IN WITNESS WHEREOF, the authorized representatives of the parties have executed this Agreement as of this 2<sup>nd</sup> day of Feb., 2009.**

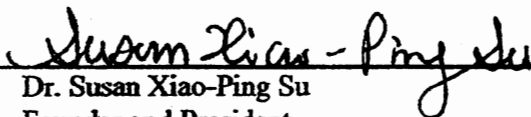
**University of East West Medicine**



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Dr. Ying Qiu Wang, L.Ac., M.D.  
Founder and President  
University of East West Medicine

**Tri-Valley University**



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Dr. Susan Xiao-Ping Su  
Founder and President  
Tri-Valley University



**Tri-Valley University  
and  
San Francisco State University**

**Articulation Agreement**

**THIS ARTICULATION AGREEMENT**, dated this 2<sup>nd</sup> day of Feb. 2009, is made by and between, Tri-Valley University hereinafter called "TVU", and San Francisco State University, hereinafter called "SFSU".

**I. PRINCIPLES OF AGREEMENT**

This ARTICULATION AGREEMENT serves as an amendment to "Course Articulation Agreement" dated 5/1/2008, between Tri-Valley University (TVU) and San Francisco State University (SFSU). SFSU has been accepting TVU's course "CS300 Logic and Computer Architecture" in Computer Science and Engineering Department transferring since then, in comparable to SFSU's "ENGR 356 Basic Computer Architecture" at the School of Engineering.

After further careful review of the academic standards adopted and practiced by Tri-Valley University, and a thorough evaluation of TVU's School of Engineering course syllabus, curriculum, faculty profile and qualification, we have come to the conclusion that the School of Engineering at San Francisco State University will continue unconditionally accept course transferring credits for graduate courses from School of Engineering at TVU into SFSU's School of Engineering in Electrical Engineering, Computer Science and Engineering, and Mechanical Engineering areas. The minimum requirement on the grade for transferring course is "C".

**II. MUTUAL TERMS AND CONDITIONS**

**A. Accreditation Status**

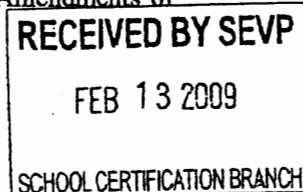
SFSU is accredited by Western Association of Schools and Colleges (WASC), Accrediting Commission for Senior Colleges and Universities). WASC is listed as a regional accrediting agency by both the United States Department of Education, and the Council for Higher Education Accreditation.

**B. During of Agreement**

This agreement shall be in effect for five (5) years from the date of signature.

**C. Non discrimination**

The parties agree to continue their respective policies of nondiscrimination based on Title VI of the Civil Rights Act of 1964 in regard to sex, age, race, color, creed, and national origin, Title IX of the Education Amendments of



1972 and other applicable laws, as well as the provisions of the Americans with disabilities Act.

**D. Modification of Agreement**

This Agreement shall only be modified in writing with the same formality as the original Agreement.

**E. Liability**

Neither of the parties shall assume any liabilities to each other. As to liability to each other, or damages to property, the parties do not waive any defense as a result of entering into this contract. This provision shall not be construed to limit the Commonwealth's rights, claims or defenses which arise as a matter of law pursuant to any provisions of this contract. This provision shall not be construed to limit the sovereign immunity of the Commonwealth or of the State System of Higher Education or the University.

**F. Entire Agreement**

This Agreement represents the entire understanding between the parties. Any changes, corrections or additions to this contract shall be in writing in the form of a supplemental agreement signed by all necessary parties and setting forth therein the proposed change, correction, or addition.

**This Articulation Agreement between Tri-Valley University and San Francisco State University is accepted and approved by the participating entities this 2nd day of February 2009.**

**Tri-Valley University**



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Dr. Susan Xiao-Ping Su  
Founder and President  
Tri-Valley University

**San Francisco State University**



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Prof. Shy-Shenq Liou  
Director of School of Engineering  
San Francisco State University



**Tri-Valley University  
and  
University of Central Florida**

**Articulation Agreement**

**THIS ARTICULATION AGREEMENT**, dated this 2nd day of February 2009, is made by and between, Tri-Valley University hereinafter called "TVU", and University of Central Florida, hereinafter called "UCF" on the course transferability between the two institutions. This Articulation Agreement is an amendment of the Course Articulation Agreement between TVU and UCF on May 1<sup>st</sup>, 2008.

**I. PRINCIPLES OF AGREEMENT**

This primary purpose and content of this agreement is to establish the course transferring relationship between the Department of Computer Science and Engineering at School of Engineering in Tri-Valley University and the Department of Statistics and Actuarial Science at University of Central Florida. UCF has been accepting 8 courses transferring from TVU since May 1<sup>st</sup>, 2008.

On the evaluation of Tri-Valley University recently developed Bachelor of Science program in Computer Science and graduate programs in Data Mining major area in the Department of Computer Science and Engineering at School of Engineering, Department of Statistics and Actuarial Science at **University of Central Florida agrees to continue accepting the course transferring from the entire Department of Computer Science and Engineering at TVU**. The minimum acceptable grade for transferring is 'C'.

**II. MUTUAL TERMS AND CONDITIONS**

**A. Accreditation Status.** The University of Central Florida is accredited by the Commission on Colleges of the Southern Association of Colleges and Schools (1866 Southern Lane, Decatur, Georgia 30033-4097: Telephone number 404 679 4501) to award degrees at the associate, baccalaureate, master's, and doctoral levels.

**B. During of Agreement.** This Agreement This agreement shall be in effect for five (5) years from the date of signature.

**C. Non discrimination.** The parties agree to continue their respective policies of nondiscrimination based on Title VI of the Civil Rights Act of 1964 in regard to sex, age, race, color, creed, national origin, Title IX of the Education



Amendments of 1972 and other applicable laws, as well as the provisions of the Americans with disabilities Act.

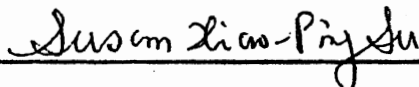
**D. Modification of Agreement** This Agreement shall only be modified in writing with the same formality as the original Agreement.

**E. Liability.** Neither of the parties shall assume any liabilities to each other. As to liability to each other, or damages to property, the parties do not waive any defense as a result of entering into this contract. This provision shall not be construed to limit the Commonwealth's rights, claims or defenses which arise as a matter of law pursuant to any provisions of this contract. This provision shall not be construed to limit the sovereign immunity of the Commonwealth or of the State System of Higher Education or the University.

**F. Entire Agreement.** This Agreement represents the entire understanding between the parties. Any changes, corrections or additions to this contract shall be in writing in the form of a supplemental agreement signed by all necessary parties and setting forth therein the proposed change, correction, or addition.

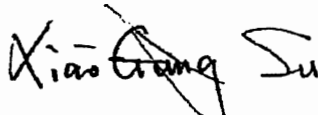
**This Articulation Agreement between Tri-Valley University and University of Central Florida is accepted and approved by the participating entities this 2<sup>nd</sup> day of Feb. 2009.**

**Tri-Valley University**

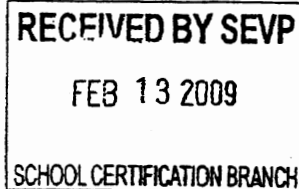


Dr. Susan Xiao-Ping Su    President  
Tri-Valley University

**University of Central Florida**



Prof. Xiaogang Su    Student Advisor  
Dept. of Statistics and Actuarial Science  
University of Central Florida



## CERTIFICATE OF SERVICE

I, Hui Chen, certify that I am an employee of the Office of the United States Attorney, Northern District of California, a person over 18 years of age and not a party to the within action. I certify that on April 17, 2015, I electronically submitted the

- **Brief for the United States as Appellee**
- **Government's Supplemental Excerpts of Record (2 Volumes)**

in the case of *United States v Susan Xiao-Ping Su*, No. 14-10499, with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

Dated: April 17, 2015

/s/ Hui Chen

Hui Chen, Paralegal Specialist