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ATTORNEYS AT LAW

This report has been redacted, in accordance with the exemptions contained within the New Jersey Open Public Records Act, to protect statements covered by the attorney-client privilege, the deliberative process privilege, and the personnel records exemption. In addition, the names of and certain other identifying information regarding the Kean University employees and other individuals who were interviewed during the investigation (or who otherwise cooperated with the investigation) were redacted to protect those individuals' privacy.

PRIVILEGED AND CONFIDENTIAL

VIA HAND-DELIVERY

Ms. Ada Morell, Chair
Kean University Board of Trustees
Kean University
1000 Morris Avenue
Union, NJ 07083

Re: Investigation of Allegations Raised by the KFT Relating to President Dawood Y. Farahi

Dear Chair Morell:

Kean University's Board of Trustees ("Board") retained this firm to conduct an investigation and provide advice to the Board in connection with allegations raised against Kean's President, Dawood Y. Farahi, by the Kean Federation of Teachers ("KFT" or "Union") regarding certain resume statements. Specifically, the Board requested that we investigate allegations related to a November 29, 2011 letter to you from the [REDACTED]. In that letter, [REDACTED] states, in part, "... academic fraud has occurred in multiple representations by President Dawood Farahi of his own academic credentials." The scope and process of the investigation, and our findings and conclusions, are discussed below.

Scope of Investigation

In addition to the allegations raised directly through [REDACTED] November 29, 2011 letter to you, we also investigated certain allegations regarding Dr. Farahi's "publications" and other credentials raised by the Union through postings made on its website on January 9, 2012. Further allegations were raised by the Union through [REDACTED] January 26, 2012 submission to us regarding alleged misrepresentations in and/or inconsistencies among certain of

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Dr. Farahi's resumes.¹ New allegations raised in the January 26 "Summary" were not investigated by this firm, and are not discussed in this report.² However, we did take the January 26th submissions by [REDACTED] into consideration to the extent they related to the allegations [REDACTED] raised in [REDACTED] November 29, 2011 letter, or to the allegations raised through the Union's January 9, 2012 website postings that we investigated.

Specifically, we investigated the following issues that the Union raised based on its review of various resumes bearing Dr. Farahi's name, and his 1983 Kean employment application: (1) whether four academic articles authored by Dr. Farahi were submitted for consideration to, accepted for publication by, or published by various journals as claimed in various documents; (2) whether a text book that Dr. Farahi represents was accepted for publication by Franklin Watts actually was accepted; (3) whether technical reports prepared by Dr. Farahi as a consultant were "published" by "APC Publishers;" (4) whether Dr. Farahi made a presentation in 1980 to the "Tenth Annual Meeting of the Association of Developmental Scientists;" (5) whether, as stated in a 2008 faculty data sheet submitted to the National Association of Schools of Public Affairs and Administration ("NASPAA"), Dr. Farahi was the "Acting Academic Dean" at Avila College from 1976-1983 and had "[o]ver 50 technical articles in major publications;" (6) whether Dr. Farahi ever served on the Editorial Review Board of Public Administration Review as claimed in certain documents; and (7) whether Dr. Farahi was "fired from" Avila College. We do not know, and did not investigate, how the Union obtained the 1983 employment application or certain resumes and other documents that it has posted on its website.

¹ On or about January 23, 2012, the Union posted on its website the majority of the information and documents it submitted to us on January 26. This posting included a document titled "Summary of Fraudulent/Questionable Resume/CV Claims Made by Kean University President Dawood Farahi" ("Summary"), which the Union apparently also sent to Governor Chris Christie with a covering letter dated January 19, 2012 (also posted on the Union's website) that called for Governor Christie to "launch a formal independent investigation of these allegations".

² The new allegations include claimed inaccuracies in and/or inconsistencies among various documents relating to Dr. Farahi's dissertation, his Fulbright scholarship and other awards, his various degrees, his military service, his academic promotions, and certain technical "publications" in addition to those identified in [REDACTED] November 29 letter to the Board.

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Summary of Investigative Process

The investigation was conducted primarily by Paula M. Castaldo and John J. Peirano, both members of the firm, with the assistance of David Alberts, an associate attorney. In the course of our investigation, we considered the following categories of documents: [REDACTED] November 29, 2011 letter to you and its attachments; [REDACTED] December 13, 2011 letter to you and its attachment; [REDACTED] undated handwritten letter to Board Secretary Michael D'Agostino and its attachments; the information/documents posted on the KFT's website on January 9, 2012; the information/documents provided by [REDACTED] to this firm on January 26, 2012 (to the extent they related to the above-enumerated issues within the scope of our investigation); documents Dr. Farahi located within his personal files; Kean's official personnel file relating to Dr. Farahi; a personal work folder left behind by Dr. Farahi when he assumed the position of President and moved from the building then housing the Public Administration Program's faculty offices to Kean Hall; any OPRA requests submitted to Kean between January 1, 2008 and the present that requested information relating to Dr. Farahi's credentials; written communications received by [REDACTED], the [REDACTED], and/or [REDACTED], Kean's [REDACTED], from third-parties relating to the allegations raised by the Union; copies of submissions made (or purportedly made) to NASPAA, a national accrediting agency, in 1987, 1994, 2001 and 2008 that resided in the offices of the Public Administration Program, the Dean's Office, or the Provost's Office; documents this firm received directly from NASPAA; editions of the academic journal Public Administration Review from the 1980s; documents this firm received from [REDACTED], the [REDACTED] of Johnson County, Kansas; and documents this firm received from [REDACTED] an [REDACTED] in Kean's [REDACTED] through the KFT's attorney, Robert Fagella, Esq.

In addition to reviewing documents, we conducted in-person interviews of the following individuals: Dr. Farahi (interviewed by Ms. Castaldo on January 10, 2012, by Mr. Peirano and Ms. Castaldo on January 19, 2012; and further interviewed by Ms. Castaldo on January 23, 2012); [REDACTED], the [REDACTED] of Kean's [REDACTED] (interviewed by Ms. Castaldo on January 17, 2012); [REDACTED]

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██████████ since approximately ██████████ (interviewed by Ms. Castaldo on January 20, 2012); ██████████ (interviewed by Ms. Castaldo on January 23, 2012); and ██████████, an ██████████ in Kean's ██████████ (interviewed by Ms. Castaldo on January 23, 2012).³

The following interviews were conducted by telephone: ██████████, ██████████ ██████████ of Administrative Science Quarterly (interviewed by Ms. Castaldo on January 12, 2012); ██████████ ██████████ of Public Administrative Review (interviewed by Ms. Castaldo on January 16, 2012); ██████████, ██████████ of Management Science (interviewed by Ms. Castaldo on January 18, 2012); ██████████, ██████████ of Administration & Society (interviewed by Ms. Castaldo on February 2, 2012); ██████████, ██████████ at Avila University (interviewed by Ms. Castaldo on January 13, 2012); ██████████, a ██████████ employed by Scholastic, Inc., a publishing company which owns the rights to Franklin Watts and Grolier, Inc. (Franklin Watts' former parent company) (interviewed by David Alberts on several occasions during the week of January 16, 2012); ██████████, the ██████████ of Johnson County, Kansas (interviewed by Mr. Alberts on January 20 and 24, 2012); ██████████, a ██████████ at World Bank (interviewed by Mr. Alberts on January 24, 2012); and ██████████, ██████████ ██████████, University of Wisconsin (interviewed by Mr. Alberts on January 19 and 20, 2012). Ms. Castaldo also spoke by telephone to ██████████ (an ██████████ at NASPAA) and ██████████ (the ██████████ at NASPAA) on January 11, 2012. On various occasions in January 2012, Ms. Castaldo also communicated with ██████████ ██████████ and ██████████, both ██████████ at Kean, by telephone and email regarding certain searches they conducted on Kean's servers in connection with the investigation. This office also communicated by email with certain of the above-referenced individuals.

³ After initially agreeing to meet with us without a lawyer ██████████ and ██████████ subsequently advised that they would meet only if Mr. Fagella, who represents the KFT, were present. Mr. Fagella was present for their January 23, 2012 interviews, as was James Lidon, Esq. of this office.

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We also had frequent communications with [REDACTED]

[REDACTED] of Dr. Farahi, [REDACTED], and [REDACTED]

Each interviewee was advised that this firm's charge was to conduct an investigation into the allegations against Dr. Farahi and provide the Board with its fact findings and advice. The Kean employees we interviewed further were advised that this firm does not represent Dr. Farahi, the KFT or any of its members, or the interviewees individually in connection with the investigation.

Dr. Farahi fully cooperated with the investigation, made his personal records available to us, and agreed to be interviewed by us without having his own lawyer present. [REDACTED] and [REDACTED] also were highly cooperative and met with us without lawyers. In general, the third-parties to whom we spoke also were cooperative and were willing to provide us with information.

At our request, [REDACTED] contacted [REDACTED] to schedule a meeting with Ms. Castaldo. [REDACTED] first communication with [REDACTED] for that purpose was on January 3, 2012, and [REDACTED] contacted [REDACTED] several times thereafter. [REDACTED] never responded to [REDACTED] in any fashion. On January 9, 2012, Ms. Castaldo sent [REDACTED] a letter which advised that she was available to interview [REDACTED] any time on January 10, 11, 12, or 13 to afford [REDACTED] an opportunity to provide information and/or documents that [REDACTED] believed supported the Union's allegations in addition to that already provided to the Board. The letter further stated that if [REDACTED] did not believe a meeting was necessary, but wanted us to consider additional information and/or documents, [REDACTED] should provide such to us by January 13. Through Mr. Fagella (who, subsequent to Ms. Castaldo's sending the January 9 letter, advised Ms. Castaldo that he also represents [REDACTED]), Ms. Castaldo later extended the date by which [REDACTED] could make a written submission to us to the close of business on January 17, 2012. [REDACTED] did not provide any form of written submission until after the close of business on January 26, 2012.

Fact-Findings

Four Academic Articles

The Union contends that there is no evidence to support Dr. Farahi's representations in various resumes and his 1983 employment application that four academic articles he authored

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were submitted for consideration to, accepted for publication by, or published by four journals. The four academic articles at issue are: "Patterns of Administrative Efficiency," "Shadow Pricing as a Decision-Making Tool," "Budget Control and Fiscal Policy," and "Determining Your MIS Needs." The documents referenced by the Union in support of their allegation are, in addition to certain resumes and Dr. Farahi's 1983 Kean employment application, written communications from the four journals at issue to the Union (which appear to confirm that they never published any articles by Dr. Farahi), and print-outs of searches in various data bases for publications by Dr. Farahi. During our investigation, we reviewed the resumes and employment application challenged by the Union, and also reviewed Dr. Farahi's references to these four articles in promotion and reappointment packets located in his personnel file.

Dr. Farahi acknowledges that none of these articles ever was published.⁴ However, in a resume attached to his 1986 reappointment packet, under the heading "Research and Publications," Dr. Farahi identified one of the articles by its title, the name of the journal, and a year, without any qualifying language such as "submitted to" or "accepted by." Dr. Farahi advised that perhaps the "type could have skipped," but that he could not say for sure why no such qualifying language was included. In addition, in Kean's 1987 submission to NASPAA in support of its application for accreditation (which Dr. Farahi admits he was involved in preparing),⁵ under the heading "Publications," one of the articles is identified by title, the name of the journal, and a year, without any qualifying language such as "submitted to" or "accepted by." There is a separate heading in this document titled "Current Faculty Research," under

⁴ Dr. Farahi was able to produce, from his personal files, a couple of versions of "Determining Your MIS Needs." These documents [REDACTED] He was unable to locate copies of the other three articles. However, Dr. Farahi's reappointment packet signed on December 9, 1983 indicates that an article "submitted to" ASQ and a copy of an "Article for PAR" were attached to the packet. Dr. Farahi's signature appears below the list of attachments to the packet. Under Dr. Farahi's signature is the signature of the Department Chairperson. While not evident from the document itself, Dr. Farahi stated that the Chairperson's signature indicates that all the attachments identified in the packet were, in fact, attached. [REDACTED]

⁵ NASPAA first awarded accreditation to Kean's Master in Public Administration Program in 1987. Since that time, Kean has been required to apply for re-accreditation every seven years. Such applications were made in 1994, 2001 and 2008. The applications for accreditation/re-accreditation included submission of two volumes of information; Volume I contained information about the Program itself (although in 1987 it apparently also contained information concerning the credentials of individual faculty members), and Volume II contained, among other things, "faculty data sheets" (i.e., resumes) for the Program's core faculty and secondary faculty.

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which two of the other articles at issue are identified with the qualifier “submitted for publication.”⁶

With respect to Dr. Farahi’s representations that the articles in question were “submitted to” or “accepted by” various journals, in his initial interview Dr. Farahi maintained that his representations must have been true; otherwise, he would not have made them. In a later interview, Dr. Farahi advised us that the reference in his 1982 resume (submitted to Kean in support of his 1982 application for employment, which did not result in his hire) to “Patterns of Administrative Efficiency” as accepted by Administration and Society, and his reference in his 1983 Kean employment application (which did result in his hire) to this same article as accepted by Administrative Science Quarterly (“ASQ”) were mistakes (which he claimed were made because he did not type these documents and likely failed to carefully proofread them), and that the only journal that accepted the article for publication was Management Science.⁷

Dr. Farahi did produce evidence (specifically, an [REDACTED] February 2, 1980 cover letter) to confirm that “Patterns of Administrative Efficiency” (referred to in the cover letter as “Patterns of Administrative Efficiency: Determining Your MIS Needs”) was submitted to Administration and Society. Dr. Farahi also stated that other records he once had from the 1980s

⁶ Also, in a resume the Union has posted on its website and labeled the “1990” resume, under the heading “Research and Publications,” two of the four articles at issue are listed by title, the name of a journal, and the year, without any qualifying language such as “submitted to” or “accepted by.” We found two copies of this resume in a personal folder left behind in Willis Hall by Dr. Farahi when he assumed the position of President. While Dr. Farahi acknowledged that the folder was his, he denied creating or reviewing the resume, stating that there were font changes within the document that made it appear as if it was cut and pasted from other documents, and that the resume was out of place in this folder, which generally contained other categories of records. We do not know whether this resume was submitted to the University or any third-party on Dr. Farahi’s behalf (nor has Union claimed that it was). [REDACTED]

[REDACTED] We also note that 22 years have passed since the resume’s alleged creation.

⁷Dr. Farahi stated that it is not particularly helpful to an applicant to represent that an article merely was submitted; according to Dr. Farahi, the point of including that information in a C.V. is simply to let the reader know what the applicant’s research interests are. He further stated that it is commonly known that when an author indicates that a publication has been “accepted,” it means that the article has been accepted with conditions that include possible revisions. As to why none of the articles that were listed as accepted for publication ultimately were published, Dr. Farahi stated that the accepting journals likely required that he make revisions to the articles that would have required a significant time investment, and that because of various events that he stated transpired in the 1980s (i.e., his move to New Jersey, his starting a new job at Kean, his becoming involved in various projects relating to the computerization of Kean, and a shift in his personal focus and the focus of his discipline from academic research to technical research) he let these articles “fall by the wayside.”

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may have been lost through moves (including his move from Missouri to New Jersey in the early 1980s and a subsequent move within New Jersey), through a divorce in the 1990s, and through the move of his office location to Kean Hall when he assumed the position of President.

Dr. Farahi's resumes represent that two of the articles at issue were submitted to ASQ. ASQ's current [REDACTED], [REDACTED], who has been in that position for [REDACTED] years, reported to us that [REDACTED] searched handwritten log books that purportedly recorded every submission made to the journal from 1972 into the 1990s by author and title, and that Dr. Farahi's name does not appear in the log books for the years 1977 through 1986. [REDACTED] was adamant that had the two articles in question been submitted, they would have been logged.

As to Dr. Farahi's references to certain of these articles as "submitted to" or "accepted by" the other journals at issue, the [REDACTED] of PAR and Management Science advised us that, to the best of their knowledge, the journals no longer have records relating to submissions and acceptances from the 1980s.⁸

Our review of Dr. Farahi's resumes and promotion/reappointment packets also reflected that with respect to three of the four academic articles at issue, Dr. Farahi's references to the dates of submission and/or acceptance varied. Generally speaking, the resumes and promotion/reappointment packets created later in time identified later dates for the alleged year of the articles' submission to and/or acceptance by various journals.⁹ [REDACTED]

[REDACTED] In this connection, however, we note that these date changes sometimes also occurred in faculty data sheets

⁸In written communications to both the Union and to [REDACTED], the [REDACTED] of Administration and Society stated, in relevant part, "[w]e cannot say with certainty, however, that Dr. Farahi did not receive some communication from A&S that he might have chosen to interpret or describe as 'accepted.'" We spoke with [REDACTED] on February 2, 2012. [REDACTED] advised that the journal no longer keeps records relating to article submissions or acceptances from years prior to 2008. As noted above, Dr. Farahi advised us that his reference in an early resume to an article as "accepted" by Administration and Society was a mistake (although he produced a covering letter to us to demonstrate that the article was submitted to that journal).

⁹ By way of example, under the heading "Publications Within the Past Five Years" in his 1986-87 and 1987-88 promotion packets, Dr. Farahi referenced the article "Determining Your MIS Needs" as submitted to PAR in 1986. In earlier documents, he referred to this article as submitted to PAR in 1982 or accepted by PAR in 1983.

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submitted to NASPAA, which, according to Dr. Farahi, would not have provided a direct, personal benefit to him. In general, Dr. Farahi attributes the changing dates to sloppiness on his part; he stated that he does not type, and that the mistakes, which he failed to catch, probably were made by the individuals who typed the documents for him.

None of the four articles discussed above is referenced in the 2002 resume Dr. Farahi submitted in support of his application for the position of President.

Text Book

The Union challenges Dr. Farahi's representation in various documents that a text book he authored (titled "Strategic Management: A Decision-Making Approach") was accepted for publication by Frankin Watts in 1982. Essentially, the Union appears to argue that if the book had been accepted, it would have been published, and the Union can find no evidence of such publication.

Dr. Farahi acknowledged that the book never was published.¹⁰ He produced to us an early outline and draft chapters of the book. These documents [REDACTED]

[REDACTED] Further evidence that the book (or at least a draft of it) existed was located in Dr. Farahi's reappointment packet signed on December 9, 1983, wherein he indicated that a "[c]hapter outline of text to be completed for Frankin Watts" was attached to the packet. Dr. Farahi was unable to produce any documentary evidence reflecting that the book actually was accepted for publication by Franklin Watts (or reflecting any of his communications with Franklin Watts).

[REDACTED] (a [REDACTED] who has worked for Grolier, Franklin Watts' former parent company, and Scholastic, which now owns the rights to Franklin Watts and Grolier, for [REDACTED] years) confirmed that a search of Scholastic's archives for records of the book and Dr. Farahi's name yielded no results. [REDACTED] noted that if the book was accepted for publication but not ultimately published by Franklin Watts, Scholastic might not have records of it.

¹⁰ In the "1990" resume which, again, Dr. Farahi disclaims, the book is identified under the heading "Research and Publications" by title, the publisher (Franklin Watts) and a year (1982); there is no qualifying language such as "submitted to" or "accepted by."

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When asked why the book ultimately was not published, Dr. Farahi initially advised that he ceased pursuing publication because Franklin Watts asked him (he believes in 1984) for \$2,500 to produce the first 100 copies, and he and his then-wife decided that they could not afford the investment. He also advised that he was upset Franklin Watts had not mentioned the \$2,500 fee in its initial communications with him.

In a later interview, we reviewed with Dr. Farahi his promotion and reappointment packets; in those documents he continued to indicate that he was working on the book for Franklin Watts as late as November 24, 1987 (the date on which he initialed his 1987-88 promotion packet, which refers to the book as accepted by Franklin Watts and “70% complete”).¹¹ During that interview, Dr. Farahi stated that he never advised Franklin Watts he was not interested in further pursuing publication of the book because of the \$2,500. We contacted ██████████ again; ██████ stated that according to ██████ recollection, it was not the publisher’s practice to ask an author for money. Because ██████████ was relying on ██████ recollection, we again note the passage of 25-30 years since these events purportedly occurred.

We spoke with Dr. Farahi a third time regarding the book. At that time, he stated that Franklin Watts did not ask him for \$2,500; rather, he recalled that in or around 1983 Franklin Watts told him that his English and writing were “not good,” and that he should hire an editor (or the publisher could recommend an editor) to help him prepare the book.¹² According to Dr. Farahi, the editor whom he contacted advised that his fee would be \$2,000 to \$2,500. Dr. Farahi stated that he did not hire the editor and was unable to reach Franklin Watts again thereafter, but that he continued to work on the book, hoping that even if Franklin Watts did not publish it, another publisher would. We again contacted ██████████ – ██████ stated that in the 1980s, Franklin Watts was a national publishing house that employed in-house editors, so ██████ would

¹¹ In contrast, in Dr. Farahi’s 1983 covering letter submitted to Kean in which he expressed interest in a faculty position, he states “I have already completed the first draft of a textbook tentatively titled, Decision-Making: An MIS Approach. Franklin Watts, the publisher, expects that it will be ready for distribution by the Fall of 1984.” Dr. Farahi confirmed to us that the book referred to in the 1983 covering letter is the same book referred to as “Strategic Management: A Decision-Making Approach.”

¹² Early draft chapters of the book that Dr. Farahi produced to us (as well as other papers and reports prepared by Dr. Farahi in the early 1980s that he produced to us) ██████████

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expect that the company would have used an in-house editor to assist an author (as opposed to asking the author to hire and pay for an outside editor). [REDACTED] was not certain of this, however.¹³

The text book is not referenced in the 2002 resume Dr. Farahi submitted in support of his application for the position of President.

Technical Reports

The Union also challenges Dr. Farahi's references to two reports that he claims were "published" in the early 1980s by "APC Publishers." The reports are titled "Johnson County, Kansas: An Operations Review" and "Computer Purchase, Utilization and Management."

Dr. Farahi has produced copies of both reports. These documents [REDACTED] [REDACTED] APC stands for American Professional Consultants, a consulting company that Dr. Farahi started with other partners and eventually took over. We asked Dr. Farahi why, if APC was a consulting company, he refers to it as "APC Publishers" in a number of his resumes and promotion/reappointment packets. He responded that while the reports were not "published" in the "traditional sense" (which he explained to mean published by a publishing house with an ISBN number or published by an "academic journal"), they were published in the sense that they were reproduced and distributed by APC, and that was what he intended to impart by referencing APC as "APC Publishers." One of the reports at issue was prepared at the request of Johnson County, Kansas; we were able to confirm through [REDACTED] [REDACTED] the [REDACTED] at Johnson County, and documents [REDACTED] forwarded to us, that the County did contract with APC for the preparation of the report. The report itself reflects that the operations review discussed therein was conducted by a team of consultants, including Dr. Farahi, and Dr. Farahi was identified as the principal consultant.¹⁴

¹³ We further observed that in his 1988-1989 promotion packet, under the heading "Publications Within the Past Five Years," Dr. Farahi refers to the book by title and then states "University of Wisconsin Center for Strategic Research, 198_." Dr. Farahi advised that the reference was not to a publication by the University of Wisconsin; it was to a ten to fifteen minute presentation he gave at the University of Wisconsin. Dr. Farahi has not produced any documentary evidence of the presentation, and we did not verify with the University of Wisconsin whether such presentation occurred (although the University did confirm to us that it had not published a book by Dr. Farahi). Dr. Farahi explained that he did not limit the items listed under such a "Publications" heading strictly to publications. We note that the instructions in the promotion packet under this heading read as follows: "Cite in a standard format. Include co-authors, title, journal or publisher, volume, date, page numbers. Submit examples, if desired."

¹⁴ In his 2002 resume submitted in support of his application for the position of President, Dr. Farahi states, under the heading "Research and Professional Achievements (selected)" that he was the "**Principal author** of a major

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According to Dr. Farahi, the second APC report at issue (“Computer Purchase, Utilization and Management”) was not prepared at the request of any client; rather, it was produced by APC and distributed to various municipalities and counties as a marketing effort in the hopes that it would lead to business. The report itself does not identify any particular individual(s) as the author(s). This report is not referenced in the 2002 resume Dr. Farahi submitted in support of his application for the position of President.

Presentation

The Union challenges whether Dr. Farahi made a presentation to the “Tenth Annual Meeting of the Association of Developmental Scientists” in 1980. Dr. Farahi produced a copy of the paper he says was presented. The cover page contains the title of the presentation (“PROCESS MANAGEMENT SYSTEMS: An Integrative Approach to Program Development, Implementation and Review”), and also contains Dr. Farahi’s name, followed by “Avila College Kansas City, Missouri 64145.” The following statement is printed at the bottom of the cover page: “This paper was presented at the Tenth Annual Conference of the Association of Developmental Scientists sponsored by the International Bank for Reconstruction and Development (World Bank) on July 18, 1980 in Washington D.C.” The cover and other pages of the document [REDACTED].

In the “Summary” document produced to us on January 26, 2012, the Union asserts that “no evidence can be found that the [Association of Developmental Scientists] itself exists.” The Union further asserts that the Association “appears to be about childhood development and not public administration” (we assume that the Union so asserts because of the name of the Association, but are not certain). We were unable to find any information regarding this

reorganization plan for Johnson County, KS ...” (emphasis in original), thus indicating that there were other authors. Dr. Farahi’s references to this report in certain of the documents we reviewed do not contain any qualifying language reflecting that he was the principal author, as opposed to the sole author of the report. For example, Dr. Farahi does not make reference to his co-consultants in his promotion packets (under the headings “Publications Within the Past Five Years”), which instruct that “co-authors” should be identified with respect to publications. However, the packets indicate that Dr. Farahi apparently attached the Johnson County report to a number of them, and the report itself clearly identifies his co-consultants. With respect to this report, we also observed that under the heading “Publications Within the Past Five Years” in his 1988-1989 promotion packet (signed on November 22, 1988), Dr. Farahi refers to the report as published in 1983 (all other references identified the date 1982, and the report itself is dated June 1982). Had the 1982 been used, it would have fallen outside the 5-year period referenced in the packet heading.

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Association. However, we note that the paper Dr. Farahi produced to us does not address childhood development issues; it addresses the subject of organizational management. We contacted [REDACTED], a [REDACTED] at World Bank (the organization that allegedly sponsored the conference according to the paper's cover page).¹⁵ [REDACTED] was unable to locate, on World Bank's Intranet, information relating to a conference of the Association of Developmental Scientists that occurred in 1980. [REDACTED] also searched for records relating to other conferences that were sponsored by World Bank in 1980, but found nothing, which [REDACTED] said leads [REDACTED] to believe that records from that year no longer are kept.

[REDACTED] also was unable to find in World Bank's archives any information about Resources Management International (which organization, as noted below, Dr. Farahi believes also may have sponsored the conference). [REDACTED] said that World Bank co-sponsors many events with other companies and does not necessarily keep records about these companies.

In many of the documents we reviewed (including Dr. Farahi's 1983 C.V.), Dr. Farahi states that this paper (also referred to as "Process Management: An Integrated Approach to Program Review and Development") was "published" by Resource Management International ("RMI") in Washington, D.C. in 1980. As proof of the existence of RMI, Dr. Farahi produced an original March 18, 1981 letter from RMI to him ([REDACTED]) relating to an application he made for a job with RMI.¹⁶ Dr. Farahi believes that RMI also sponsored the conference at which he made the presentation. His best recollection is that RMI either published the presentation as part of a conference program, or that his presentation was included in the proceeding minutes. We were unable to independently confirm whether RMI (which apparently no longer operates in the United States) participated in or sponsored the conference, or that it "published" (in the non-traditional sense) Dr. Farahi's paper.

¹⁵ [REDACTED] asked that if we reported the conversation with [REDACTED] in this report, we qualify it by stating that [REDACTED] statements were not "an official position of the World Bank."

¹⁶ Through Internet research, we found several reports that appear to have been prepared by RMI in the early to mid 1980s. Many of these reports contain the same RMI logo as the March 18, 1981 letter Dr. Farahi produced to us. Based on these reports, it appears that RMI was not a publishing company, but, rather, a consulting company that was hired by organizations (in many cases, government organizations) to provide guidance on how to run certain projects.

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The presentation is not referenced in the 2002 resume Dr. Farahi submitted in support of his application for the position of President.

Statements That Dr. Farahi Was the “Acting Academic Dean” at Avila College and That He Had “Over 50 Technical Articles in Major Publications”

The Union’s November 29, 2011 submission to the Board challenges statements in a 2008 faculty data sheet submitted to NASPAA in connection with the Master in Public Administration Program’s application for re-accreditation that: (1) Dr. Farahi was the “Acting Academic Dean” at Avila College from 1976-1983; and (2) he had “[o]ver 50 technical articles in major publications.” In later postings on its website, the Union notes that the “Acting Academic Dean” statement also appears in the 1994 faculty data sheet submitted to NASPAA (we note that this is accurate, as reflected by bound copies of this submission on file at the University – NASPAA reports that it no longer has copies of this submission or any submissions made by Kean prior to 2001).¹⁷ The “[o]ver 50 technical articles” statement also appears in Dr. Farahi’s faculty data sheet that NASPAA has on file as part of Kean’s 2001 re-accreditation submission.¹⁸

The 2008 faculty data sheet that the Union submitted to the Board on November 29, 2011 and posts on its website is not the same version that NASPAA has on file. Nevertheless, [REDACTED] [REDACTED] in 2008, believes that the version of the data sheet on file at NASPAA was submitted to NASPAA electronically, and the version posted on the Union’s website was submitted to NASPAA through a mailed hard copy. At any rate, the statements the Union is challenging appear in both versions of the faculty data sheet. However, the two versions are different in terms of format, and also contain certain differences with respect to content, including the fact that the 2008 version on file at NASPAA (which, again, is identical to the

¹⁷ This statement also appears in a C.V. submitted as part of the Public Administration Program’s “Response to Request for Proposal” submitted to the State of New Jersey, Department of Personnel in November 1997. [REDACTED] [REDACTED] produced portions of this document to us on January 27, 2012.

¹⁸ The faculty data sheet for Dr. Farahi contained in Kean’s 2001 submission to NASPAA (a copy of which was forwarded to us by [REDACTED] NASPAA’s [REDACTED] is identical in terms of content to the 2008 faculty data sheet for Dr. Farahi on file at NASPAA (which also was forwarded to us by [REDACTED]).

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version submitted in 2001) identifies Dr. Farahi as the “Chairperson, Department of Public Administration,” and the version the Union posted on its website identifies him as the President.

Dr. Farahi acknowledges that he never was an Acting Dean at Avila, and that he has not authored “[o]ver 50 technical articles in major publications.”¹⁹ As previously noted, Dr. Farahi acknowledges that he was involved with the preparation of the NASPAA submissions made in 1987. However, he asserts that he did not prepare or review any of the faculty data sheets bearing his name that were submitted to NASPAA in 1994, 2001 and 2008.²⁰ Nor does he know for certain who prepared them, but he believes it must have been someone in a clerical position. Dr. Farahi noted that starting in 1994, Kean started submitting more condensed versions of the faculty data sheets to NASPAA. He stated that perhaps a clerk who was condensing his data sheet counted up the publications identified in one of his earlier resumes and wrote, in the 2001 faculty data sheet, “[o]ver 50 technical articles in major publications.” None of Dr. Farahi’s resumes we have reviewed that were created prior to 2001 list 50 or more technical articles and/or reports.

When we spoke with him, Dr. Farahi stated that if he were going to make the statements challenged by the Union about his position at Avila and the number of technical publications he authored, it would have made sense for him to do so when it could have helped him gain some personal advantage (i.e., when he was applying for a position at Kean in 1982 and 1983 or when he applied for the position of President in 2002). His 1982 resume, 1983 resume and employment application, and 2002 resume did not contain those statements. Dr. Farahi also noted that the 1994, 2001 and 2008 submissions to NASPAA were for re-accreditation; the Master’s Program already had been accredited in 1987 absent any claim that he was an Acting Academic Dean at Avila College or that he had published over 50 technical articles.

¹⁹ Upon his review of the various NASPAA submissions, Dr. Farahi noted another error that first appeared in his 1994 faculty data sheet and apparently was carried through to the version of the 2008 faculty data sheet on file at NASPAA; specifically, these documents state that Dr. Farahi held the position of “Interim County Administrator” in Johnson County, Kansas, a position he never actually held. The November 1997 Response to Request for Proposal produced by [REDACTED] also referenced this position.

²⁰ Dr. Farahi advised us that he reviewed the Volume I submissions containing information about the Program in 2001 and 2008, but not the Volumes II containing the faculty data sheets.

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In addition to [REDACTED] in 2001. [REDACTED] advised that in 2001 and 2008, [REDACTED] (and those individuals assisting [REDACTED]) asked that faculty members submit updated data sheets that conformed to NASPAA's requirements.²¹ [REDACTED] further advised that after updated faculty data sheets were collected, an administrative assistant or graduate student may have altered them with respect to font style, but they did not alter substantive content. [REDACTED] stated that as the then-Chair of the Department, Dr. Farahi was heavily involved with the preparation of the NASPAA submissions in 2001 (again, Dr. Farahi stated that he only reviewed the 2001 Volume I submission to NASPAA). As to 2008, at [REDACTED] January 23, 2012 interview, [REDACTED] was adamant that [REDACTED] received the version of Dr. Farahi's 2008 faculty data sheet posted on the Union's website by email from [REDACTED], Dr. Farahi's [REDACTED]. At [REDACTED] January 20, 2012 interview, [REDACTED] advised us that, to the best of [REDACTED] recollection, [REDACTED] did not create or transmit to [REDACTED] or [REDACTED] either version of the 2008 faculty data sheets we reviewed.

On January 27, 2012, [REDACTED] produced via email, through Mr. Fagella, PDF copies of emails dated July 29 and 30, 2008 between [REDACTED] and [REDACTED], the [REDACTED] of Kean's [REDACTED] regarding the content of Dr. Farahi's updated data sheet for submission to NASPAA. These emails reflect that [REDACTED] suggested and/or may have made changes to the wording of Dr. Farahi's resume after receiving it from [REDACTED] (although the statements challenged by the Union are not referenced in the emails). [REDACTED] also produced a copy of an email from [REDACTED] to [REDACTED] dated July 30, 2008, in which [REDACTED] states, in relevant part, "As you requested, please find PDF file for the President's Vita. I did want him to look it over, however, he is involved in a meeting[]"; attached to this email is the version of the 2008 faculty data sheet for Dr. Farahi that is posted on the Union's website. This

²¹ The [REDACTED] in the [REDACTED] who were interviewed about the preparation of faculty data sheets for NASPAA ([REDACTED], the current [REDACTED], and [REDACTED] and [REDACTED]) all stated that they updated and reviewed [REDACTED] faculty data sheets before they were submitted to NASPAA. Certain of those sheets also contained some errors, however, as evidenced by a correction sheet submitted to NASPAA in 2001 (in connection with [REDACTED] and another [REDACTED] data sheets), and by [REDACTED] noticing a typographical error in [REDACTED] 2008 data sheet at the time we interviewed [REDACTED].

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email appears to bolster Dr. Farahi's contention that he did not review this 2008 faculty data sheet.²²

As noted, the 2002 resume Dr. Farahi submitted in support of his application for the position of President does not contain the above-discussed statements challenged by the Union.

Service on PAR's Editorial Review Board

On January 9, 2012, the Union posted its December 5, 2011 letter to [REDACTED], the [REDACTED] at PAR. Among other things, the letter asks the question, "In a 1985 resume, Farahi claims that he served on your journal's editorial board as [a] reviewer of papers on MIS. Is this true?". We are not certain what 1985 resume the Union is referencing. The resume the Union has labeled "1985" (which is posted on the Union's website and was produced to us on January 26) does not contain any reference to service on PAR's Editorial Review Board.²³ At any rate, in Dr. Farahi's 1985-1986 promotion packet, he states that he is a "Member" of the "Public Administration Review Editorial Board (information literature)" from "1984-[to present]."

[REDACTED] December 9, 2011 letter responding to [REDACTED] simply stated, "We did not find anything." When Ms. Castaldo spoke to [REDACTED], [REDACTED] advised that [REDACTED] had not done any research to answer the Union's above-referenced question. [REDACTED] further advised that the way to answer this question would be to determine whether Dr. Farahi was listed as a member of the Board of Editors in past editions of the journal. [REDACTED] also noted that an individual could be asked to review articles for PAR without actually becoming a member of the Board of Editors.

We reviewed all editions issued by PAR from 1984 through 1989. Dr. Farahi was not listed as a member of the Board of Editors in any of these issues. When questioned about it, Dr. Farahi advised us that he never was a member of the "big editorial board." He further advised that he did not believe that the above-referenced statement in his 1985-86 promotion packet

²² Kean's IT Department has confirmed the authenticity of the emails produced by [REDACTED].

²³ In its postings made on or around January 23, 2012, the Union contends that the representation about the Editorial Review Board was made in what the Union has labeled the "1990" resume, which, again, Dr. Farahi disclaims. In that resume, next to the year 1985, the following is stated: "Member of Editorial Board & Reviewer for articles on MIS for Public Administration Review."

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implied that he sat on the “big” Board because of the parenthetical language that followed (*i.e.*, “information literature”). Dr. Farahi produced from his personal files [REDACTED] an April 1, 1985 letter to him from [REDACTED] (the then-[REDACTED] [REDACTED] that reads, in relevant part, “Thank you for agreeing to assist Public Administration Review by serving as a reviewer of articles related to computers and the application of computers within public agencies.”²⁴ The letter does not state that Dr. Farahi would be a member of the Board of Editors.

There is no reference to service on PAR’s Board of Editors in the 2002 resume Dr. Farahi submitted in support of his application for the position of President.

Inference that Dr. Farahi Was “Fired From” Avila College

On the version of the 2008 NASPAA faculty data sheet posted on the KFT’s website on January 9, 2012, an unidentified individual handwrote “fired from” next to the portion of this data sheet that references “Avila College.” Ms. Castaldo spoke to [REDACTED], the current [REDACTED] at Avila University. [REDACTED] advised that the University no longer had any records relating to Dr. Farahi’s departure from Avila.

Dr. Farahi’s personnel file contained an original letter dated January 11, 1983 from [REDACTED] (then a [REDACTED] at Avila College) recommending Dr. Farahi for a position at Kean. The letter [REDACTED] In it, [REDACTED] wrote, in relevant part, “It is somewhat difficult for me to write this letter of recommendation since Dawood’s departure would be a great loss to Avila and I would personally miss him very much as a colleague.” Dr. Farahi (who maintains that he left Avila voluntarily) also produced, from his personal files, a letter of resignation he contends he submitted to Avila (dated May 16, 1983).

We found no evidence to sustain the inference that Dr. Farahi was fired from Avila. To the contrary, the above-referenced evidence we reviewed [REDACTED]
[REDACTED]

²⁴ In his 1985 reappointment packet, a “Letter from PAR” is listed as an attachment to the packet.

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Conclusions

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If you have any questions regarding our investigation or our conclusions, we are available to confer with you at your convenience.

Very truly yours,

McELROY, DEUTSCH, MULVANEY &
CARPENTER, LLP

Handwritten signature of John J. Peirano in cursive script.

John J. Peirano

Handwritten signature of Paula M. Castaldo in cursive script.

Paula M. Castaldo