



# FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, DC 20554

Enforcement Bureau  
Investigations and Hearings  
Division

July 20, 2012

**DA 12-1171**

**VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED**  
**AND E-MAIL**

Ms. Gloria F. Harper  
c/o Ms. Cynthia Marie Cimino  
Federal Public Defender  
Hale Boggs Federal Building  
500 Poydras St., Room 318  
New Orleans, LA 70130

**Re: Notice of Debarment**  
**File No. EB-12-IH-0400**

Dear Ms. Harper:

The Federal Communications Commission (Commission) hereby notifies you that, pursuant to Section 54.8 of its rules, you are prohibited from participating in the schools and libraries universal service support mechanism (E-Rate program) for three years from either the date of your receipt of this Notice of Debarment, or of its publication in the Federal Register, whichever is earlier in time (Debarment Date).<sup>1</sup>

On March 22, 2012, the Commission's Enforcement Bureau (Bureau) sent you a Notice of Suspension and Initiation of Debarment Proceeding (Notice of Suspension)<sup>2</sup> that was published in the Federal Register on April 23, 2012.<sup>3</sup> The Notice of Suspension suspended you from participating in activities associated with or relating to the E-Rate program. It also described the basis for initiating debarment proceedings against you, the applicable debarment procedures, and the effect of debarment.

As discussed in the Notice of Suspension, in June 2011 you pled guilty to conspiring with others to fraudulently obtain \$4.5 million in E-Rate contracts through your companies,

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<sup>1</sup> 47 C.F.R. § 54.8(g). See also 47 C.F.R. § 0.111 (delegating authority to the Enforcement Bureau to resolve universal service suspension and debarment proceedings).

<sup>2</sup> Letter from Theresa Z. Cavanaugh, Acting Chief, Investigations and Hearings Division, Enforcement Bureau, Federal Communications Commission, to Ms. Gloria F. Harper, Notice of Suspension and Initiation of Debarment Proceeding, 27 FCC Rcd 2888 (Enf. Bur. 2012) (Attachment 1).

<sup>3</sup> 77 Fed. Reg. 24202 (Apr. 23, 2012).

Ms. Gloria F. Harper

July 20, 2012

Page 2

Computer Training and Associates and Global Networking Technologies.<sup>4</sup> In addition, you admitted to bribing school officials in exchange for control of the E-Rate application and competitive bidding process.<sup>5</sup> Your fraudulent scheme adversely affected 20 schools and school districts located throughout six states.<sup>6</sup> Pursuant to Section 54.8(c) of the Commission's rules, your conviction of criminal conduct in connection with the E-Rate program is the basis for this debarment.<sup>7</sup>

In accordance with the Commission's debarment rules, you were required to file with the Commission any opposition to your suspension or its scope, or to your proposed debarment or its scope, no later than 30 calendar days from either the date of your receipt of the Notice of Suspension or of its publication in the Federal Register, whichever date occurred first.<sup>8</sup> The Commission did not receive any such opposition.

For the foregoing reasons, you are debarred from participating in the E-Rate program for three years from the Debarment Date.<sup>9</sup> During this period, you are excluded from participating in any activities associated with or related to the E-Rate program, including the receipt of funds or discounted services through the E-Rate program, or consulting with, assisting, or advising applicants or service providers regarding the E-Rate program.<sup>10</sup>

Sincerely,

Theresa Z. Cavanaugh, Chief  
Investigations and Hearings Division  
Enforcement Bureau

cc: Johnnay Schrieber, Universal Service Administrative Company (via e-mail)  
Rashann Duvall, Universal Service Administrative Company (via e-mail)  
Juan Rodriguez, Antitrust Division, United States Department of Justice (via e-mail)  
Stephanie Toussaint, Antitrust Division, United States Department of Justice (via e-mail)

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<sup>4</sup> *United States v. Gloria F. Harper*, Criminal Docket No. 2:10-cr-00326-CJB-ALC, Plea Agreement at 3-5 (E.D. La. entered June 6, 2011).

<sup>5</sup> *Id.* at 4.

<sup>6</sup> *Id.* at 5. *See* Appendix.

<sup>7</sup> 47 C.F.R. § 54.8(c).

<sup>8</sup> 47 C.F.R. §§ 54.8(e)(3), (4). Any opposition had to be filed no later than April 21, 2012.

<sup>9</sup> *Id.* §§ 54.8(e)(5), (g).

<sup>10</sup> *Id.* §§ 54.8(a)(1), (5), (d).

Appendix

| Schools and School Districts <sup>1</sup>                               | City and State       |
|---|----------------------|
| All Saints School   | New Orleans, LA      |
| St. Augustine High School   | New Orleans, LA      |
| St. David School  | New Orleans, LA      |
| St. Monica School   | New Orleans, LA      |
| Gould Public School District  | Gould, AR            |
| Holly Grove Public School District                                      | Holly Grove, AR      |
| Antioch Center – St. Stephen’s Lutheran Church                          | Antioch, IL          |
| Fairfield Center  | Round Lake Beach, IL |
| Ingleside Center – Ingleside United Methodist Church                    | Ingleside, IL        |
| St. Mary’s Center – Libertyville Covenant Church                        | Libertyville, IL     |
| Waukegan Center   | Waukegan, IL         |
| Zion Center – Zion Benton High School                                   | Zion, IL             |
| Niles Terrace Center  | Waukegan IL          |
| Wilmer – Hutchins Independent School District                           | Dallas, TX           |
| Innovation Child Development Center                                     | Tallahassee, FL      |
| Innovation School of Excellence   | Tallahassee, FL      |
| Capital City School (also known as Covenant Academy Preparatory School) | Tallahassee, FL      |
| Whole Word Christian Academy  | Miami, FL            |
| Twin Buttes Elementary School   | Halliday, N.D.       |
| White Shield School   | Roseglen, N.D.       |

<sup>1</sup> *United States v. Gloria F. Harper*, Criminal Docket No. 2:10-cr-00326-CJB-ALC, Factual Basis at 2–3.