**Shared culpability and the public interest**

## Introduction

We have not been able to ‘follow the money’ and have no idea how these companies make their money. Not paying their bills, defeating debtors and defying legal judgments are part of the way they do business. Separately, I notice that brother Elio D’Anna and co-director Simonides (HOFA Co no 09248323) have gotten into NFT - Non-Fungible Tokens that can have various values – idea in the art world and on submarines!

You need to decide what, of the below, should be forwarded to Oliver for fact checking and adding to the report

## Summary response

The Botaccio group is a loosely formed network of companies controlled by the D’Anna and Mosca families. The interests of these families control this network and how they operate. Between them, the families retain full control of the companies, and they continually shuffle the pack of directors, shareholders and ‘persons of significant interest’ within an almost baffling set of new, dormant and dissolved companies. The purpose of this behaviour is unclear and because of that is suspicious. This has been commented on by the Alaco report

This addendum has been prepared by the BRAG team and in particular focuses on the relationships between the individual family members as shareholders, directors, or with significant interest in two operations - Eventhia in London and the European School of Economics (ESE) in London, US, Italy, Spain and other locations. ESE has a various history. ESE is suspect in terms of its activities, reorganizations, bankruptcy and public criticism via a victims website at ‘eseleaks.wordpress.com’. ESE in London has been reshuffled following its first UK venture. Emilie Edberg, the manager of Eventhia, regularly appears on ESE publicity material The connection between Eventhia London and ESE is close. We noted that ESE advertised Camden Town Hall as the new location of ESE and then removed the image from the ESE website. In her personal statement. i.e.in the November 2023 submission for the Camden Centre Licence, Emilie Edberg said that “The final initiative will be that of providing specialized, university level short-courses in the fields of business and administration - in partnership with the European School of Economics ([www.ese.ac.uk](http://www.ese.ac.uk/)). These courses will be run throughout the year and, as part of our agreement with the Council, we will ensure that a 50% scholarship programme will be available for all local Camden residents who wish to enroll.” We note there is no published scholarship programme

Significantly these enterprises continue to share common members of the ‘Botaccio family who from time to time shuffle their roles and interests in each. These members are Elia D’Anna, Joeseph Jordan D’Anna and John Sossio Mosca

Please see the appended chart ‘Control rotations’ where the year of birth is shown to clarify the person’s identity

Culpability

The concern arises that ESE is not a well-founded business – exactly the opposite. ESE has failed many. Yet it promotes itself with false promises and self builds its own reputation with claims of fake endorsement and accreditation. Past students claim that a fake degree from ESE is ’useless’. (3) By promoting the ‘school’ this way It flagrantly misleads students, their families and members of the public. This is fake validation at its worst! The people controlling ESE and Eventhia are well aware of this and craft their claims convincingly and even more so when they channel them through third parties who unwittingly endorse or profit from the practice.

(3) <https://eseleaks.wordpress.com/>

### We checked ESE claims that refer to others in the complicity and then checked what those referees actually do and their actual relationship each holds with ESE

## How does Accreditation and Degree Validation Work in the UK

**Recognized Bodies**: In the UK, only institutions that are listed as "recognized bodies" by the UK government are authorized to award UK degrees. These recognized bodies are typically universities and some specialized institutions.

**Listed Bodies**: Institutions that do not have degree-awarding powers but offer degree courses validated by recognized bodies are known as "listed bodies." These institutions provide courses leading to a degree that is awarded by a recognized body.

**Quality Assurance**: The Quality Assurance Agency for Higher Education (QAA) is the organization responsible for overseeing the quality and standards of higher education in the UK. They review institutions and programs to ensure they meet certain academic standards.

**Accreditation**: Accreditation of educational institutions and their degree programs is generally handled by governmental or independent accrediting agencies. The accreditation ensures that an institution's programs meet certain educational standard

## What ESE Says about itself

### at Wikipedia

* The European School of Economics (ESE) is a private college of higher education. It is accredited by [ASIC](https://en.wikipedia.org/wiki/Accreditation_Service_for_International_Colleges),[[1]](https://en.wikipedia.org/wiki/European_School_of_Economics#cite_note-1) validated by [Richmond, The American International University in London](https://en.wikipedia.org/wiki/Richmond,_The_American_International_University_in_London), and is an officially approved [Learning Provider](https://en.wikipedia.org/wiki/UK_Register_of_Learning_Providers) (UKPRN 10061489). (UK Register of Learning Providers) ESE offers UK [bachelor's degree](https://en.wikipedia.org/wiki/Bachelor%27s_degree), [master's degree](https://en.wikipedia.org/wiki/Master%27s_degree), [MBA](https://en.wikipedia.org/wiki/Master_of_Business_Administration), and specialized short programmes at its centres in London, Rome, Milan, Florence, and Madrid.
* In 2021, ESE was the winner of the 'Global Student Satisfaction Awards' by **Study Portals**,[[4]](https://en.wikipedia.org/wiki/European_School_of_Economics#cite_note-4) winning for the category of 'Quality of Student Life' against over 4000 participating universities and other national higher education institutes.[[5]](https://en.wikipedia.org/wiki/European_School_of_Economics#cite_note-5)
* But **Study Portals** says is a marketing outfit. From their own website: Study portals is your partner for truly global, fully digital and direct-to-student recruitment. We work closely with universities and other HEd institutions around the world to guarantee their ROI based on result-based services focused on growing and optimizing student recruitment efforts

<https://studyportals.com/institutions/>

### Degree Courses at ESE

A screenshot of a computer

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## Accreditation Status: ESE claims these accreditation relationships

<https://www.ese.ac.uk/about-ese/accreditations-partnerships>

### Richmond American University London (Richmond)

* [Richmond American University London](https://www.richmond.ac.uk/) has entered into agreement to validate specific UK awards delivered by the European School of Economics. Richmond American University London will monitor the provision of these European School of Economics courses to ensure suitably high standards are maintained.  Upon successful completion of a validated programme in any ESE centre, students will receive the same UK award from Richmond American University London, stating the European School of Economics as the place of study.
* **Note: (i) Richmond** claims its own degrees are validated by the UK Open university under the OUVP scheme (ii) Is not listed as an OUVP partner by the Open University

### British Council and IELTS

#### ESE claims they partner with British Council and IELTS and displays the symbol

* IELTS is the International English Language Testing System
* The British Council is one of the co-owners of IELTS and administers the IELTS exams globally.
* Many educational institutions, including those offering courses in English-speaking countries, may require students to submit IELTS scores as proof of English proficiency, but this does not imply a formal partnership with the British Council or IELTS
* IELTS registration partners are individuals and organisations recognised by the British Council as official suppliers for referring students to IELTS test centres
* **ESE is not listed as a high-level partner by British Council IELTS**

### ASIC: (Accreditation Service for International Schools, Colleges, and Universities)

* ASIC’s accreditation may be recognized for certain purposes, like visa sponsorship, but it does not carry the same weight as formal academic accreditation by bodies like the QAA. If you are looking to ensure that a degree is recognized by the UK government, it is crucial to verify that the degree-awarding institution is listed as a recognized body by the UK government. (Office for Students)
* What the ESE website claims ‘The European School of Economics holds UK Accreditation from ASIC (Accreditation Service for International Schools, Colleges, and Universities) with Premier Status for its commendable Areas of Operation’
* What ASIC’s web site says: ASIC accreditation may provide some credibility to institutions in terms of quality, but it does not grant degree-awarding powers or official recognition by the UK government

**I asked Chat GPT:**

Is ASIC’s UKVI (UK Government) approved accreditation recognised by the UK government?

**ChatGPT said:**

No, ASIC’s (Accreditation Service for International Schools, Colleges, and Universities) accreditation is not recognized by the UK government as an official accreditation for degree-awarding purposes.

<https://www.asic.org.uk/>

### Fontys University of Applied Sciences

* What ChatGPT says As of my last update, Fontys University of Applied Sciences and the European School of Economics (ESE) did not have a formal, publicly recognized partnership
* Fontys web site has no information about any partnership with ESE

<https://www.fontys.nl/en/Home.htm>

### Accreditation Partners (Historic) – Claimed by ESE

* ESE says:- The European School of Economics (ESE) awards UK degree courses in its centers in London, Rome, Florence, Milan, Madrid and New York in partnership with a number of UK universities and other legally recognised degree-awarding bodies.[[6]](https://en.wikipedia.org/wiki/European_School_of_Economics#cite_note-:0-6) Since its founding in 1994, ESE academic partners have been:

|  |  |
| --- | --- |
| Degrees issued by | Arrangement terminated |
| [University of Hertfordshire](https://en.wikipedia.org/wiki/University_of_Hertfordshire) | Not checked |
| [The Nottingham Trent University](https://en.wikipedia.org/wiki/Nottingham_Trent_University) | Not checked |
| [University of Buckingham](https://en.wikipedia.org/wiki/University_of_Buckingham) | 1998 - 2012 |
| [University of Chichester](https://en.wikipedia.org/wiki/University_of_Chichester) | 2013 - 2016 |
| [New Charter University](https://en.wikipedia.org/wiki/New_Charter_University) | 2016 to phasing out around 2020 |
| [Richmond, The American International University in London](https://en.wikipedia.org/wiki/Richmond,_The_American_International_University_in_London) (Richmond) | Unclear – may not be current, Open AI says the relationship ended in 2015. Richmond claim it is current |

### The Richmond American International University in London

* Accredits one other university. This is the Chinese Jiangxi University of Technology
* Claims its own degrees are validated by the UK Open university under the OUVP scheme (1)
* ‘Richmond Is not listed as an OUVP partner by the Open University (2)

**I asked ChatGPT:**

What is the current relationship between Richmond, The American International University in London (commonly known as Richmond University) and the European School of Economics (ESE)?

**ChatGPT said**

* As of ChatGPT’s last update, Richmond, The American International University in London (commonly known as Richmond University) and the **European School of Economics (ESE)** **do not have an active partnership**. Their previous partnership, which allowed Richmond University to validate degree programs offered by ESE, ended in 2015.
* TS comment: This requires verification: Richmond phone numbers were unanswered this morning. Needs checking

**What Richmond American International University in London web site says**:

The European School of Economics (ESE) is a private college of higher education, with some programmes validated by Richmond American University London. As “a school without borders”, ESE offers bachelor’s degree, master’s degree (MSc or MBA) programmes as well as specialized short courses in international business and economics at its centres in London, Madrid, Rome, Milan, and Florence.

(1) <https://www.richmond.ac.uk/study-abroad/overseas-study-partners/richmond-validated-programmes/#>

(2 ) <https://www5.open.ac.uk/validation-partnerships/about-ou-validation/ou-validation-partner-institutions>

### University of Buckingham

The partnership between the European School of Economics (ESE) and the University of Buckingham ended in 2014. Before that, the University of Buckingham validated certain degree programs offered by the European School of Economics, which allowed ESE students to receive degrees awarded by the University of Buckingham. However, after 2014, this validation agreement was no longer in place, and the European School of Economics sought other arrangements for its degree programs

## Other ESE claimed partners

### UK Register of Learning Providers (UKRLP)

**About UKRLP**

* The UK Register of Learning Providers (UKRLP) is the portal for (UK) government departments, agencies, learners, and employers to share key information about learning providers.
* The UKRLP allows providers to update their information in one place and share this across agencies such as the Education and Skills Funding Agency (ESFA), the Higher Education Statistics Agency (HESA), the Office for Students (OfS) and UCAS.
* Since provider registration opened on 1 August 2005, the UKRLP has grown to more than 50,000 providers.
* These providers have been verified against a recognised external source and allocated a UK Provider Reference Number (UKPRN). This is the unique identifier used to share information with the UKRLP partner agencies.
* The UKRLP does not quality assure or accredit the learning provision of the registered providers in any way. Comment ESE INSIGHT TD) is listed as a provider but is not approved by UKRLP min any way

<<https://www.ukrlp.co.uk/ukrlp/ukrlp.about_prc>>

### OfS: The office for students.org.uk

[**About**](https://www.officeforstudents.org.uk/about/what-we-do/) **OfS : From OfS web site**

* We’re the regulator for higher education in England. We protect the interests of students by supporting a diverse and independent higher education sector.
* Universities and colleges choose to register with us. This allows them to access benefits such as public funding and gives them eligibility to apply for the power to award degrees.
* We set requirements that registered higher education providers must meet for teaching quality, student outcomes, equality of access and participation, and their management, governance and financial sustainability.
* We monitor the performance of universities and colleges, publish data and reports, and take action if a registered provider is failing to meet our requirements.
* ESE is not listed as an accredited provider of degrees in the UK
* Richmond American University of London is not listed as an accredited provider
* [Richmond American International University London](https://www.richmond.ac.uk/key-data-and-reports/american-british-accreditation/): is listed as an accredited provider of degrees in the UK

### <https://www.officeforstudents.org.uk/>

### QAA:

**I asked Chat GPT:**

What are the responsibilities of QAA?

**ChatGPT said:**

* The QAA is an organization in the UK higher education landscape, ensuring that institutions provide quality education and that academic standards are maintained across the sector. If you're considering studying in the UK, attending a QAA-reviewed institution can provide confidence in the quality and recognition of your education.
* The QAA assesses how UK universities and other higher education providers maintain their academic standards and quality. This involves reviewing and evaluating institutions to ensure that they meet nationally agreed-upon standards and expectations for higher education.
* The QAA develops and publishes Subject Benchmark Statements, which define what graduates in specific subject areas are expected to know, do, and understand. These benchmarks help ensure consistency and standards across similar programs offered by different institutions.
* The QAA conducts various review processes, such as the **Higher Education Review (HER)**, to assess institutions’ performance in key areas like academic standards, quality of learning opportunities, and the quality of information provided to students.
* The QAA produces the **UK Quality Code for Higher Education**, which sets out the expectations that all UK higher education providers are required to meet. The Quality Code ensures that students have access to a high-quality education that is recognized internationally.
* The QAA advises governments and regulatory bodies on issues related to higher education quality and standards. It also provides guidance and resources to help institutions improve their practices.

**What QAA says**

* ESE is not listed as a member of QAA
* [Richmond American University London](https://www.richmond.ac.uk/key-data-and-reports/american-british-accreditation/). Is listed as a member of QAA

### <https://www.qaa.ac.uk/>

### UCAS: the Universities and Colleges Admissions Service

**I asked Chat GPT:**

Does UCAS accredit colleges to issue UK degrees?

**Chat GPT replied:**

No, UCAS (the Universities and Colleges Admissions Service) does not accredit colleges or universities to issue degrees in the UK. UCAS is a centralized service used by students to apply for undergraduate courses at UK universities and colleges. It facilitates the application process but does not have the authority to accredit or validate degree programmes.

<https://www.ucas.com/>

### BAC: British Accreditation Council

**BAC website says**

* BAC was established in 1984 to provide a comprehensive quality assurance scheme for independent further and higher education in the UK. Our accreditation is recognised the world over by students, agents and government officials as the clearest mark of educational quality in the private sector. Alongside the British Council, whose Accreditation UK scheme serves as the definitive guide to the country’s English language centres, we have overseen the inspection of private post-16 education for over 30 years.
* ESE is not listed as a provider by BAC
* [Richmond American University London](https://www.richmond.ac.uk/key-data-and-reports/american-british-accreditation/). Is listed as a provider by BAC

<https://www.the-bac.org/>

### Educations.com

A screenshot of a video

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Emilie Edberg is featured on the Educations .com website promoting ESE

<https://youtu.be/niq6GjWnX7A>

**From Educations.com web site**

* Advertise your courses on student websites
* Generate student leads, applications and enrollments with Keystone's global network of student websites
* Educations.com is part of the Keystone Education Group

**From Keystone Education web site**

For education institutions, we offer an [end-to-end solution](https://www.keg.com/our-solutions?hsLang=en) across the entire student recruitment value chain, providing tech-powered student marketing and recruitment services to over 5,500 institutions in more than 190 countries. We aim to help institutions reach, engage, recruit and enroll students at scale, without compromising on providing a quality student experience

<https://www.educations.com/>

## Control Rotation (dates are year of birth)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **COMPANY NAME** | **COMPANY NUMBER** | **OFFICERS (ACTIVE)**  **DIRECTORS unless identified as secretary** | **FORMER OFFICERS (RESIGNED) DIRECTORS unless identified as secretary;** *Companies used for nominee secretaries & directors omitted* | **PERSON(S) OF SIGNIFICANT CONTROL (ACTIVE)** |
| **EVENTHIA LIMITED** | **11343360** | Emilie Edberg (1993 | Joseph Jordan D’Anna (1986) | Elia D’Anna (1985) |
|  |  | Joseph Jordan D’Anna (1986) | John Sossio Mosca (1991) |  |
|  |  |  |  |  |
| **EUROPEAN SCHOOL OF ECONOMICS LIMITED** | **09251143**  **Dormant** | John Sossio Mosca (1991) | Bruno del Prete (1980) | Elio D’Anna (1946) |
|  |  |  | [John] Sossio Mosca (1954)  *[Error on name]* |  |
|  |  |  |  |  |
| **EUROPEAN SCHOOL OF ECONOMICS ITALY** | **03201860** | John Sossio Mosca (1991) | **Stefano D’Anna** (secretary) | Elio D’Anna (1946) |
|  |  | Enrica Budetta (1973) | **Elizabeth Marie Mitchell D’Anna** (Secretary) | John Sossio Mosca (1991)  **ceased** |
|  |  | Lavinia Lucchesini (Secretary) | Giuseppina Laura Mogavero (secretary) |  |
|  |  |  | Kristin Sharpe (secretary) |  |
|  |  |  | Enrica Burdetta (1973) |  |
|  |  |  | Elio D’Anna (1946) |  |
|  |  |  | **Stefano D’Anna** (1943) |  |
|  |  |  | Giuseppina Laura Mogavero (1956) |  |
|  |  |  | **Alessandro Nomellini** (1975) |  |
|  |  |  |  |  |
| **EUROPEAN SCHOOL OF ECONOMICS – ESE INSIGHT LTD** | **03921661** | Medusa (UK) Limited (Secretary) | John Sossio Mosca (1991) | Medusa (UK) Limited |
|  |  | Kristin Sharpe (1965) | Sossio Mosca (1954) |  |
|  |  |  | Sarah Louise Petre-Mears (1974) |  |
|  |  |  |  |  |
| **MEDUSA (UK) LIMITED** | **04100631** | Sossio Mosca (1954) | Elio D’Anna (Secretary) | Elio D’Anna (1946) |
|  |  |  | **Elizabeth Marie Mitchell D’Anna** (Secretary) |  |
|  |  |  | Sossio Mosca (Secretary) |  |
|  |  |  | Elio D’Anna (1946)  John Sossio Mosca |  |
| **COMPANY NAME** | **COMPANY NUMBER** | **OFFICERS (ACTIVE)**  **DIRECTORS unless identified as secretary** | **FORMER OFFICERS (RESIGNED) DIRECTORS unless identified as secretary;** *Companies used for nominee secretaries & directors omitted* | **PERSON(S) OF SIGNIFICANT CONTROL (ACTIVE)** |
| EUROPEAN SCHOOL OF ECONOMICS SPAIN  **DISSOLVED 2018** | **07209755** | John Sossio Mosca (1991) | Enrica Budetta (Secretary) | Elio D’Anna (1946) |
|  |  |  | Elio D’Anna (1946) |  |
|  |  |  | **Stefano D’Anna** (1943) |  |
|  |  |  | **Alessandro Nomellini** (1975) |  |
|  |  |  | Kristin Renee Sharpe (1975) |  |
|  |  |  | Professor Don Martin Tracy (1941) |  |
|  |  |  |  |  |
|  |  |  |  |  |
| EUROPEAN SCHOOL OF ECONOMICS UNITED KINGDOM LIMITED  Originally incorporated as **WORLDAZTEC Ltd 1997**  became **European School of Economics (International) Ltd** Feb 1998 | **03474028**  Dissolved 2018 | Giuseppina Laura Mogavero (1956) *2005 –)*  Enrica Budetta (1973) also Secretary  *(2007-)*  Sanaul Haque Mallick (1951) *(2013 -)* | **Stefano D’Anna** (1943) *1997-2004; also 2004-2005*  Elizabeth Marie Mitchell D’Anna (1953) *Jan-Feb 2004*  Sossio Mosca (1954) *2004-2005*  Alexander Derek Stuart Ruxton (1969) *1999-2002*  Alan Taylor (1962) *1997-1999*  Dr David Seth Preston (1954) *Feb-March 2004*  Paul Crowson (1948*) Jan-April 2004*  Richard William Small (1956) *Jan-May 2004*  Sam Atkinson (1959) *Feb-April 2004*  Elisabetta Ceragioli (1973) *2005-2007*  Dr Lawrence Robert Drury (1939) *2005-2008*  **Alessandro Nomellini** (1975)  (1975) *2011-2014*  Prof. Don Martin Tracy (1941) *Sept-Nov 2014*  Ian Robert Penman(1962) *2013-2015* | **No information available** |

## Notes