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8 **BEFORE THE**
DEPARTMENT OF CONSUMER AFFAIRS
9 **FOR THE BUREAU FOR PRIVATE POSTSECONDARY EDUCATION**
STATE OF CALIFORNIA
10

11 In the Matter of the Statement of Issues
12 Against:
13 **GILIGIA COLLEGE**
14 **Renewal for Approval to Operate and Offer**
Education Programs for Non-Accredited
15 **Institutions Applicant**
16 **Institution Code: 55199106**
17 Respondent.

BPPE Case No. 1003079

OAH Case No.

STATEMENT OF ISSUES

18
19 Complainant alleges:
20

21 **PARTIES**

22 1. Dr. Michael Marion, Jr. ("Complainant") brings this Statement of Issues solely in his
23 official capacity as the Chief of the Bureau for Private Postsecondary Education ("Bureau"),
24 Department of Consumer Affairs.

25 2. On or about January 12, 2016, the Bureau received an application for a Renewal for
26 Approval to Operate and Offer Education Programs for Non-Accredited Institutions from Giligia
27 College ("Respondent"). On or about December 25, 2015, Hovhanes Kartounian certified under
28

1 penalty of perjury to the truthfulness of all statements, answers, and representations in the
2 application. The Bureau denied the application on October 27, 2017.

3 JURISDICTION

4 3. This Statement of Issues is brought before the Director of the Department of
5 Consumer Affairs (“Director”) for the Bureau under the authority of the following laws. All section
6 references are to the Education Code unless otherwise indicated.

7 4. Section 94886 states:

8 “Except as exempted in Article 4 (commencing with Section 94874) or in compliance with
9 the transition provisions in Article 2 (commencing with Section 94802), a person shall not open,
10 conduct, or do business as a private postsecondary educational institution in this state without
11 obtaining an approval to operate under this chapter.”

12 5. Section 94887 states:

13 “An approval to operate shall be granted only after an applicant has presented sufficient
14 evidence to the bureau, and the bureau has independently verified the information provided by the
15 applicant through site visits or other methods deemed appropriate by the bureau, that the applicant
16 has the capacity to satisfy the minimum operating standards. The bureau shall deny an application
17 for an approval to operate if the application does not satisfy those standards.”

18 STATUTORY PROVISIONS¹

19 6. Section 94885, subdivision (a), states in relevant part:

20 “(a) The bureau shall adopt by regulation minimum operating standards for an institution
21 that shall reasonably ensure that all of the following occur:

22 (1) The content of each educational program can achieve its stated objective.

23 ...

24 (3) The facilities, instructional equipment, and materials are sufficient to enable students to
25 achieve the educational program’s goals.

26
27 ¹ On October 11, 2009, the California Private Postsecondary Education Act of 2009 was
28 signed into law. (Educ. Code, §§ 94800, et seq.) The Act was recently amended, effective
January 1, 2017. (See: Senate Bill No. 1247.) This Statement of Issues is based on the post-
amendment version of the Act.

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(8) Adequate records and standard transcripts are maintained and are available to students.”

7. Section 94897 states in relevant part:

“An institution shall not do any of the following:

...

(j) In any manner make an untrue or misleading change in, or untrue or misleading statement related to, a test score, grade or record of grades, attendance record, record indicating student completion, placement, employment, salaries, or financial information, including any of the following:

(1) A financial report filed with the bureau.

(2) Information or records relating to the student's eligibility for student financial aid at the institution.

(3) Any other record or document required by this chapter or by the bureau.”

8. Section 94900 states in relevant part:

“(a) An institution shall maintain records of the name, address, e-mail address, and telephone number of each student who is enrolled in an educational program in that institution.

(b) An institution shall maintain, for each student granted a degree or certificate by that institution, permanent records of all of the following:

(1) The degree or certificate granted and the date on which that degree or certificate was granted.

(2) The courses and units on which the certificate or degree was based.

(3) The grades earned by the student in each of those courses.”

9. Section 94909, subdivision states in relevant part:

“(a) Except as provided in subdivision (d), prior to enrollment, an institution shall provide a prospective student, either in writing or electronically, with a school catalog containing, at a minimum, all of the following:

...

(7) Information regarding the faculty and their qualifications.”

1 **REGULATORY PROVISIONS**

2 10. California Code of Regulations, title 5, section 71400.5, subdivision (a), states:

3 "The inclusion of false or misleading information, or the intentional or negligent omission
4 of pertinent information on any application may result in the denial of the application or a delay in
5 processing, and may be grounds for action pursuant to Article 18 of the Act."

6 11. California Code of Regulations, title 5, section 71405 states:

7 "(a) If, after the submission of an application but prior to the Bureau's decision to approve
8 or deny an approval to operate, there is any material change in circumstances affecting any
9 information contained in the application or submitted by the institution in support of the application,
10 the institution shall immediately inform the Bureau in writing.

11 (b) For the purposes of this section, a change in circumstance is "material" if, without the
12 inclusion of the new or different information into the application, the information contained in or
13 the supporting documentation to the application would be false, misleading, or incomplete."

14 12. California Code of Regulations, title 5, section 71475, states in pertinent part:

15 ...

16 "(c) The application for renewal of approval to operate and offer educational programs for
17 non-accredited institutions shall include all of the following:

18 (1) The name, institution/school code and website address of the institution.

19 (2) The physical address of the institution's primary administrative location in California."

20 ...

21 "(4) The physical address, phone number and fax number of each campus and branch at which
22 the educational programs will be offered, including the identification of the institution's main
23 location and branch locations."

24 ...

25 "(k) The institution shall identify in the application the chief executive officer, chief operating
26 officer, and chief academic officer and describe their education, experience, and qualifications to
27 perform their duties and responsibilities. If there have been no substantive changes since the last
28 submission, the institution may so state and is not required to submit documentation."

1 ...

2 “(n) The institution shall describe in the application, in detail its mission and objectives. If
3 there have been no substantive changes since the last submission, the institution may so state and
4 is not required to submit documentation.”

5 ...

6 “(t) In addition, the institution shall list in the application, the following for each educational
7 program offered unless there have been no substantive changes since the last submission. If there
8 have been no substantive changes made the institution may so state and is not required to provide
9 documentation.

10 ...

11 “(4) The title of the educational programs and other components of instruction offered,
12 including a description of the level of the courses (e.g., below college level, undergraduate level,
13 graduate level);”

14 ...

15 “(7) Whether the educational program is designed to fit or prepare students for employment
16 in any occupation. If so, the application shall identify each occupation and job title to which the
17 institution represents the educational program will lead.”

18 “(x) The application shall include a statement that the institution has contracted with
19 sufficient duly qualified faculty members who meet the qualifications of section 71720 unless there
20 have been no substantive changes since the last submission. If there have been no substantive
21 changes made the institution may so state and is not required to provide documentation.”

22 “(y)(1) For each program offered, the application shall contain a description of the facilities
23 and the equipment which is available for use by students at the main, branch, and satellite locations
24 of the institution unless there have been no substantive changes since the last submission. If there
25 have been no substantive changes made the institution may so state and is not required to provide
26 documentation.

27 (2) For facilities that are leased or rented, the application shall contain the name and address
28 of the lessor or landlord, together with a copy of any use, lease, or rental agreements for the facilities

1 unless there have been no substantive changes since the last submission. If there have been no
2 substantive changes made the institution may so state and is not required to provide documentation.

3 (3) The application shall include, in addition to the description of the physical facilities,
4 building diagrams or campus maps to assist the Bureau in locating these facilities. The diagrams or
5 maps shall identify the location of classrooms, laboratories, workshops, and libraries unless there
6 have been no substantive changes since the last submission. If there have been no substantive
7 changes made the institution may so state and is not required to provide documentation.

8 (4) The description in the application shall include specifications of significant equipment
9 that demonstrate that the equipment meets the standards prescribed by the Code and this chapter
10 and is sufficient to enable students to achieve the educational objectives of each education program
11 unless there have been no substantive changes since the last submission. If there have been no
12 substantive changes made the institution may so state and is not required to provide documentation.

13 (5) For each item of significant equipment, the description in the application shall indicate
14 whether the equipment is owned, leased, rented, or licensed for short- or long-term, or owned by
15 another and loaned to be used without charge unless there have been no substantive changes since
16 the last submission. If there have been no substantive changes made the institution may so state and
17 is not required to provide documentation.

18 (6) The application shall contain a list of all permits, certifications, or other evidence of
19 inspections or authorizations to operate required by the jurisdictions within which the institution
20 operates that the institution has obtained, and/or an explanation as to why those permits,
21 certifications, or inspections have not yet been obtained unless there have been no substantive
22 changes since the last submission. If there have been no substantive changes made the institution
23 may so state and is not required to provide documentation.”

24 “(aa) If an institution represents to the public, in any manner, that it offers job placement
25 assistance, the application shall include a description of the job placement assistance that it provides
26 unless there have been no substantive changes since the last submission. If there have been no
27 substantive changes made the institution may so state and is not required to provide
28 documentation.”

1 13. California Code of Regulations, title 5, section 71700 states:

2 "The Bureau may request that an institution document compliance with the standards set forth
3 in the Act and this Division to obtain and maintain an approval to operate."

4 14. California Code of Regulations, title 5, section 71705 states:

5 "An institution shall have a written statement of its mission and the objectives for each
6 educational program. The mission and the objectives shall indicate the kind of education offered,
7 for whom the instruction is intended and the expected outcomes for graduates."

8 15. California Code of Regulations, title 5, section 71720, subdivision (b)(2) states:

9 "Each instructor shall maintain their knowledge by completing continuing education courses
10 in his or her subject area, classroom management or other courses related to teaching."

11 16. California Code of Regulations, title 5, section 71730, subdivision (a) states:

12 "Each institution shall have a chief executive officer, a chief operating officer and chief
13 academic officer. One person may serve more than one function."

14 17. California Code of Regulations, title 5, section 71810, subdivision (b), states in relevant
15 part:

16 "The catalog shall contain the information prescribed by Section 94909 of the Code and all
17 of the following:

18 ...

19 (2) A statement of the institution's missions and purposes and the objectives underlying each
20 of its educational programs;"

21 ...

22 18. California Code of Regulations, title 5, section 74200 states:

23 "Every institution shall notify the Bureau in writing at least 30 days before the institution
24 ceases to offer to the public any educational program."

25 19. California Code of Regulations, title 5, section 76140 states:

26 "(a) A qualifying institution shall collect and maintain records of student information to
27 substantiate the data reported on the STRF Assessment Reporting Form and records of the students'
28 eligibility under the Fund. Such records shall include the following for each student:

- 1 (1) Student identification number,
- 2 (2) First and last names,
- 3 (3) Email address,
- 4 (4) Local or mailing address,
- 5 (5) Address at the time of enrollment,
- 6 (6) Home address,
- 7 (7) Date enrollment agreement signed,
- 8 (8) Courses and course costs,
- 9 (9) Amount of STRF assessment collected,
- 10 (10) Quarter in which the STRF assessment was remitted to the Bureau,
- 11 (11) Third-party payer identifying information,
- 12 (12) Total institutional charges charged, and
- 13 (13) Total institutional charges paid.

14 (b) The qualifying institution shall maintain the data required under this section in an
15 electronic format that is readily available and open to inspection by the Bureau upon request. The
16 institution shall make the records immediately available to a Bureau representative conducting a
17 site inspection or, upon written request, shall provide a copy within 14 calendar days of the request.
18 All records shall be provided to the Bureau in an intelligible and orderly manner and in an electronic
19 format.”

20 **FACTUAL BACKGROUND**

21 20. On or about January 12, 2016, the Bureau received an “Application for Renewal of
22 Approval to Operate and Offer Educational Programs for Non-Accredited Institutions” (“Renewal
23 Application”) for application number 28925, from Respondent.

24 21. On or about April 25, 2016, the Bureau issued a deficiency letter to Respondent. The
25 letter identified a number of deficiencies, including but not limited to the following: failure to
26 supply a copy of Giligia College’s Bylaws, deficiencies within the enrollment agreement, and
27 failure to provide evidence of government approval of the Certified Nursing Assistant program.

28

1 22. On or about May 27, 2016, the Bureau issued a second deficiency letter to Respondent.
2 The letter identified additional deficiencies including changes to the Student Agreements, public
3 statements, catalog, and missing transcripts/certifications for faculty members.

4 23. On or about July 19, 2016, the Bureau issued a third deficiency letter to Respondent,
5 identifying deficiencies including but not limited to the following: inaccurate references to Nursing
6 Assisting/Certified Nursing Assistants; and inadequate curriculum and syllabi for online and
7 classroom programs.

8 24. On or about October 27, 2017, the Bureau issued a Notice of Denial of Application for
9 Renewal of Approval to Operate. The letter listed the basis for the denial which included the
10 following: failure to provide the Bureau with accurate information; submission of falsified School
11 Performance Facts Sheets and/or a falsified resume for Respondent's Chief Operating Officer;
12 submission of inadequate/incorrect information regarding institution objectives, educational
13 programs, faculty continuing education, and faculty credentials; inadequate equipment, instruction,
14 and assistance for students to achieve educational goals; inaccurate descriptions of school facilities;
15 and inadequate record keeping of student information.

16 **FIRST CAUSE FOR DENIAL OF APPLICATION**

17 **(Failure to Maintain an Updated Institutional Address)**

18 25. Respondent's application is subject to denial under title 5 of the California Code of
19 Regulations, section 71475, subdivisions (c) (2), and (4), in that Respondent failed to maintain an
20 updated institution's address to the Employment Development Department's training program
21 website, Caljobs, or is operating at a location not approved by the Bureau. Since November 22,
22 2013, Respondent was only approved to operate at 15643 Sherman Way, Unit 140, in Van Nuys,
23 California. However, Respondent's advertisement on the Caljobs website indicates the institution's
24 primary address is 2361 Florecita Drive in Montrose, California. Institutions that maintain listings
25 on the Caljobs website are required to provide updated information such as location changes.
26 Complainant refers to, and by this reference incorporates paragraphs 19-23, as though set forth
27 fully.

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SECOND CAUSE FOR DENIAL OF APPLICATION

(Organization and Management)

26. Respondent's application is subject to denial under title 5 of the California Code of Regulations, sections 71475, subdivision (k), 71400.5, subdivision (a), and 71730, subdivision (a) in that Respondent's deficiency responses all indicated that A.G. was the Chief Academic Officer for Giligia College. The most recent deficiency response was received by the Bureau on October 14, 2016. However, A.G. informed the Bureau on or about September 17, 2015, that he resigned from Giligia College. The 2017 catalog published on Respondent's website did not identify the institution's Chief Academic Officer, as required by section 94909, subdivision (a)(7). Complainant refers to, and by this reference incorporates paragraphs 19-23, as though set forth fully.

THIRD CAUSE FOR DENIAL OF APPLICATION

(Chief Operating Officer)

27. Respondent's application is subject to denial under title 5 of the California Code of Regulations, sections 71400.5, subdivision (a), and 71475, subdivision (k) in that Respondent submitted one or more documents with false information in regard to the institution's Chief Operating Officer. Respondent's January 2016 application and deficiency response received by the Bureau in May 2016 both identify Amie G. as the institution's Chief Operating Officer. Respondent provided a resume for Amie G., which indicated that she earned certificates in "Environmental Communication" and "Multimedia Management" in Fall of 2014 from Giligia College. However, the School Performance Fact Sheet submitted to the Bureau for 2014 shows no students as having enrolled in or graduated from either of these programs. Complainant refers to, and by this reference incorporates paragraphs 19-23, as though set forth fully.

FOURTH CAUSE FOR DENIAL OF APPLICATION

(Mission and Objectives)

28. Respondent's application is subject to denial under section 94885, subdivision (a)(1), and title 5 of the California Code of Regulations, sections 71475, subdivision (n), 71705, 71810, subdivision (b)(2), and 71730, in that the institution's objectives, as stated in the catalog submitted

1 in October 2016 and posted online (as of October 23, 2017) are inadequate and difficult to
2 comprehend; such that the Bureau is unable to reasonably determine whether the objectives can be
3 applied to measurable student learning outcomes for each educational program. Complainant refers
4 to, and by this reference incorporates paragraphs 19-23, as though set forth fully.

5 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

6 **(Instruction and Degrees Offered)**

7 29. Respondent's application is subject to denial under title 5 of the California Code of
8 Regulations, sections 71475, subdivisions (t)(4) and (7), 74200, and 71405 in that Respondent's
9 application failed to list the required information for its educational programs including a
10 description of the level of the courses and the occupation and job title, if any, to which the
11 educational programs will lead, as set forth below:

12 i. Respondent's description of the "System Administrator/Administrative Assistant"
13 program does not accurately represent the subject matter content and corresponding career
14 outcomes of the program, as it only lists the typical tasks of an Administrative Assistant, not a
15 System Administrator. Furthermore, Respondent's use of the title of "System Administrator" is a
16 misnomer, as the job skills and required training for a system administrator in no way overlap with
17 the training and job skills of an Administrative Assistant.

18 ii. Respondent's application does not clearly or consistently present the information
19 relating to the "Medical Billing" program. The program description in the syllabus states that
20 graduates of the program may go on to become "Physician-Based Coders, Hospital Coders, or
21 Medical Claims Reviewers." The title of the program does not correspond to the career outcomes
22 listed in the program description. Complainant refers to, and by this reference incorporates
23 paragraphs 19-23, as though set forth fully.

24 iii. Respondent ceased offering the following educational programs to the public: Medical
25 Assisting, Pharmacy Technician, Visual Basic Programmer, Graphic Design, Network
26 Administrator, 3-D Modeling, Computerized Taxing, 3-D Animation and Visual Effects.
27 Respondent removed all of these programs from the institution's website and the current published
28 catalog without informing the Bureau in writing at least 30 days before ceasing to offer the

1 educational programs to the public. Complainant refers to, and by this reference incorporates
2 paragraphs 19-23, as though set forth fully.

3 **SIXTH CAUSE FOR DENIAL OF APPLICATION**

4 **(Faculty)**

5 30. Respondent's application is subject to denial under title 5 of the California Code of
6 Regulations, section 71720, subdivision (b)(2), in that Respondent failed to demonstrate
7 compliance with the requirement that each instructor shall maintain their knowledge by completing
8 continuing education courses in his or her subject area, classroom management, or other courses
9 related to teaching. When Bureau representatives conducted a site visit on or about April 12, 2017,
10 Respondent did not provide evidence of continuing education in the files which were supplied to
11 the Bureau for review. Complainant refers to, and by this reference incorporates paragraphs 19-23,
12 as though set forth fully.

13 31. Respondent's application is subject to denial under title 5 of the California Code of
14 Regulations, sections 71405, 71475, subdivision (x), and 71700, in that Respondent failed to
15 comply with the requirements relating to faculty qualifications and contracts. Respondent is
16 required to provide the Bureau with documentation demonstrating that it has contracted with
17 sufficiently qualified faculty. Respondent is also required to notify the Bureau of any material
18 changes in circumstances affecting the application. Respondent provided the Bureau with syllabi
19 in 2016, listing the instructors for the various programs offered by Respondent; however, most of
20 these instructors were not listed in the 2017 catalog, as posted on Respondent's website in October
21 2017. The Bureau was provided with documentation demonstrating appropriate credentials for only
22 four out of seven of Respondent's faculty. Respondent failed to provide the current contracts for
23 all faculty, as requested. Complainant refers to, and by this reference incorporates paragraphs 19-
24 23, as though set forth fully.

25 **SEVENTH CAUSE FOR DENIAL OF APPLICATION**

26 **(Inclusion of False Information Regarding Respondent's Faculty)**

27 32. Respondent's application is subject to denial under title 5 of the California Code of
28 Regulations, sections 71475, subdivision (x), 71400.5, subdivision (a), in that Respondent

1 submitted resumes of non-employees B.A. and A.G. as part of its January 12, 2016 submission in
2 support of its application, and falsely represented that B.A. and A.G. were faculty members. In
3 fact, A.G. informed the Bureau that he had resigned from Giligia College as of September 17, 2015.
4 When contacted by the Bureau regarding his employment at Giligia College, B.A. informed the
5 Bureau that he had only interviewed for a job at Giligia College but had never been hired.
6 Complainant refers to, and by this reference incorporates paragraphs 19-23, as though set forth
7 fully.

8 **EIGHTH CAUSE FOR DENIAL OF APPLICATION**

9 **(Facilities and Equipment)**

10 33. Respondent's application is subject to denial under section 94885, subdivision (a)(3),
11 and title 5 of the California Code of Regulations, sections 71475, subdivision (y), in that
12 Respondent lacks sufficient facilities, instructional equipment, and materials to enable students to
13 achieve the educational program's goals. Bureau representatives visited Respondent's location on
14 or about April 12, 2017, and observed the following missing or inadequate facilities and equipment:

15 • The Pharmacy Technician Program lacked the following necessary equipment: a sink with
16 running water, a laminar flow hood, materials necessary for aseptic preparation of parenteral
17 products, hazardous substances/sharps disposal equipment, a hazardous substances spill kit, and a
18 cash register.

19 • Bureau representatives also observed that Web Design Computers are housed in the same
20 small room as the Medical Assisting Equipment and Pharmacy Technology equipment. Pharmacy
21 Technology training requires adequate space to prepare pharmaceuticals and simulate a pharmacy
22 setting for training. Bureau representatives determined that the available space for the Pharmacy
23 Technology program is too cramped and overrun with other programs' equipment to be suitable.

24 • Bureau representatives observed that the 3D Modeling program does not have equipment
25 sufficient to enable students to achieve educational objectives, as the institution is lacking a 3D
26 camera and 3D printers.

27 ///

28 ///

1 • Bureau representatives also observed that the Home Care Assistant program does not have
2 equipment sufficient to enable students to achieve educational objectives, as the institution was
3 lacking a wheelchair, transfer belt, simulation lab, full size anatomical models, bed, and bath.

4 Complainant refers to, and by this reference incorporates paragraphs 19-23, as though set forth
5 fully.

6 **NINTH CAUSE FOR DENIAL OF APPLICATION**

7 **(Job Placement Assistance)**

8 34. Respondent’s application is subject to denial under section title 5 of the California Code
9 of Regulations, sections 71475, subdivision (aa), that although Respondent’s website states that it
10 offers job placement assistance, none of the submitted application materials, including the syllabi
11 or curriculum included a description of the job placement assistance provided, as is required.
12 Complainant refers to, and by this reference incorporates paragraphs 19-23, as though set forth
13 fully.

14 **TENTH CAUSE FOR DENIAL OF APPLICATION**

15 **(Catalog)**

16 35. Respondent’s application is subject to denial under title 5 of the California Code of
17 Regulations, sections 71475, subdivision (y), 71400.5, subdivision (a), in that page four of
18 Respondent’s 2016 and 2017 catalogs describe the “main campus” as occupying about 2,000 square
19 feet for classroom, a library, a computer laboratory, employee and student lounge with a small
20 kitchen area and administrative offices. This description mischaracterizes the available space.
21 Bureau representatives determined that the suite only occupies 1,171 square feet. Moreover, Bureau
22 representatives determined that the library, computer lab, employee and student lounge and small
23 kitchen are all housed together in one small room. Complainant refers to, and by this reference
24 incorporates paragraphs 19-23, as though set forth fully.

25 **ELEVENTH CAUSE FOR DENIAL OF APPLICATION**

26 **(Record Keeping – Custodian of Records)**

27 36. Respondent’s application is subject to denial under sections 94885, subdivision (a)(8),
28 94897, subdivision (j), 94900, and title 5 of the California Code of Regulations, section 76140, in

1 that Respondent failed to adequately maintain student records and submitted false or misleading
2 data to the Bureau as follows:

3 • Bureau Representative J.M. requested a contact list for currently enrolled students and
4 recent graduates from Respondent. After attempting to contact recent graduates, 47 out of 84 of the
5 email addresses supplied by Respondent were returned as "undeliverable", in most cases because
6 the email address does not exist. The Bureau received a few responses from the Institution's
7 graduates, who indicated that they had graduated from a different program than the one indicated
8 in the Institution's records, or they had not graduated at all.

9 • Of the 84 students contacted by the Bureau, only one confirmed that that he had
10 graduated from the program identified in Respondent's records.

11 Complainant refers to, and by this reference incorporates paragraphs 19-23, as though set
12 forth fully.

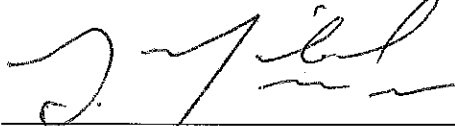
13 **PRAYER**

14 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
15 and that following the hearing, the Director of the Department of Consumer Affairs issue a decision:

- 16 1. Denying the application of Giligia College for a Renewal for Approval to Operate and
17 Offer Education Programs for Non-Accredited Institutions;
- 18 2. Taking such other and further action as deemed necessary and proper.

19
20 DATED: _____

5/21/18



21 DR. MICHAEL MARION, JR.
22 Chief
23 Bureau for Private Postsecondary Education
24 Department of Consumer Affairs
25 State of California
26 *Complainant*

24 LA2017507569; 52850122.docx