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

In the Matter of the Accusation Against:

Case No. BPPE24-0635

JEM COLLEGE
11850 Pierce Street, Suite 100
Riverside, CA 92505

ACCUSATION

Approval to Operate Institution Code No. 3302761

Respondent.

PARTIES

1. Deborah Cochrane (Complainant) brings this Accusation solely in her official capacity as the Chief of the Bureau for Private Postsecondary Education, Department of Consumer Affairs.

2. On or about December 1, 1995, the Bureau for Private Postsecondary Education issued Approval to Operate Institution Code Number 3302761 to JEM College (Respondent), owned by Medical Imaging Education Systems, Inc. The Approval to Operate Institution Code 3302761 was in full force and effect at all times relevant to the charges brought herein and will expire on January 26, 2028, unless renewed.

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JURISDICTION

3. This Accusation is brought before the Director of the Department of Consumer Affairs (Director) for the Bureau for Private Postsecondary Education, under the authority of the following laws. All section references are to the Education Code (Code) unless otherwise indicated.

4. Business and Professions Code section 118, subdivision (b), provides that the suspension, expiration, surrender, or cancellation of a license shall not deprive the Director of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

5. Section 94875 provides, in pertinent part:

The bureau shall regulate private postsecondary educational institutions through the powers granted, and duties imposed, by this chapter. In exercising its powers, and performing its duties, the protection of the public shall be the bureau's highest priority. If protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount.

STATUTORY PROVISIONS

6. Section 94877 provides, in pertinent part:

(a) The bureau shall adopt and shall enforce regulations to implement this chapter pursuant to the Administrative Procedure Act (Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code).

(b) The bureau shall develop and implement an enforcement program, pursuant to Article 18 (commencing with Section 94932) to implement this chapter.

7. Section 94932 provides:

The bureau shall determine an institution's compliance with the requirements of this chapter. The bureau shall have the power to require reports that institutions shall file with the bureau in addition to the annual report, to send staff to an institution's sites, and to require documents and responses from an institution to monitor compliance. When the bureau has reason to believe that an institution may be out of compliance, it shall conduct an investigation of the institution. If the bureau determines, after completing a compliance inspection or investigation, that an institution has violated any applicable law or regulation, the bureau shall take appropriate action pursuant to this article.

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1 8. Section 94933 provides:

2 The bureau shall provide an institution with the opportunity to remedy
3 noncompliance, impose fines, place the institution on probation, or suspend or
4 revoke the institution's approval to operate, in accordance with this article, as it
5 deems appropriate based on the severity of an institution's violations of this chapter,
6 and the harm caused to students.

7 9. Section 94936 provides, in pertinent part:

8 (a) As a consequence of an investigation, which may incorporate any
9 materials obtained or produced in connection with a compliance inspection, and
10 upon a finding that the institution has committed a violation of this chapter or that
11 the institution has failed to comply with a notice to comply pursuant to Section
12 94935, the bureau shall issue a citation to an institution for violation of this chapter,
13 or regulations adopted pursuant to this chapter.

14 ...

15 **REGULATORY PROVISIONS**

16 10. California Code of Regulations, title 5, section 75020 states, in pertinent part:

17 (a) The Bureau Chief, or their designee, or the Director's designee, is
18 authorized to issue citations containing orders of abatement or administrative fines
19 or both, pursuant to section 94936 of the Code against institutions approved under
20 the Act that have committed any acts or omissions that are in violation of the Act or
21 any regulation adopted pursuant thereto.

22 ...

23 11. California Code of Regulations, title 5, section 75050 states, in pertinent part:

24 ...

25 (b) Failure of an applicant or institution issued an approval to operate to
26 abate the violation or to pay the fine within the time allowed is a ground for denial
27 or discipline of an approval to operate.

28 ...

29 **COST RECOVERY**

30 12. Section 94937, subdivision (c), and Business and Professions Code section 125.3
31 provide, in pertinent part, that the Bureau may request the administrative law judge to direct a
32 licensee found to have committed a violation or violations of the licensing act to pay a sum not to
33 exceed the reasonable costs of the investigation and enforcement of the case, with failure of the
34 licensee to comply subjecting the license to not being renewed or reinstated. If a case settles,
35 recovery of investigation and enforcement costs may be included in a stipulated settlement.

FACTUAL ALLEGATIONS

Citation Number 2324087

13. On or about October 3, 2023, the Bureau issued Citation Number 2324087 to Respondent for failing to submit all components of the 2021 Annual Report, which was due by December 1, 2022. The Bureau issued an administrative fine and an Order of Abatement ordering Respondent to submit all components of the 2021 Annual Report as required.

14. On or about November 7, 2023, December 8, 2023, and January 17, 2024, the Bureau sent Respondent demand letters for compliance with this citation. To date, Respondent has failed to comply.

Citation Number 23240266

15. On or about May 1, 2024, the Bureau issued Citation Number 23240266 to Respondent for failing to pay its annual fee and 90-day late payment penalty fee for the 2022 and 2023 calendar years. The Bureau issued an administrative fine and an Order of Abatement ordering Respondent to pay its unpaid fees for the 2022 and 2023 calendar years as required.

16. On or about June 20, 2024, September 17, 2024, and October 23, 2024, the Bureau sent Respondent demand letters for compliance with this citation. To date, Respondent has failed to comply.

Citation Number 24250340

17. On or about May 5, 2025, the Bureau issued Citation Number 24250340 to Respondent for failing to pay its annual fee and 90-day late payment penalty fee for the 2024 calendar year. The Bureau issued an administrative fine and an Order of Abatement ordering Respondent to pay its unpaid fees for the 2024 calendar years as required.

18. On or about June 5, 2025, July 7, 2025, and August 7, 2025, the Bureau sent Respondent demand letters for compliance with this citation. To date, Respondent has failed to comply.

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CAUSE FOR DISCIPLINE

(Failure to Comply with Citations)

19. Respondent's Approval to Operate Institution Code Number 3302761 is subject to disciplinary action under California Code of Regulation, title 5, section 75050, subdivision (b), in that Respondent failed to comply with citation numbers 2324087, 23240266, and 24250340. Complainant refers to, and by this reference incorporates, the allegations set forth in above paragraphs 13 through 18, as though set forth in full herein.

PRAAYER

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

1. Revoking or suspending Approval to Operate Institute Code Number 3302761, issued to JEM College with Medical Imaging Education Systems, Inc as owner;

2. Ordering JEM College, owned by Medical Imaging Education Systems, Inc., to pay the Bureau for Private Postsecondary Education the reasonable costs of the investigation and enforcement of this case, pursuant to Educate Code section 94937, subdivision (c), and Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED: 11/20/2025

"Original Signature on File"

DEBORAH COCHRANE

Chief

Bureau for Private Postsecondary

Education

Department of Com State of California

**State of Calif.
Complainant**

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