

1 ROB BONTA  
Attorney General of California  
2 GREGORY J. SALUTE  
Supervising Deputy Attorney General  
3 MICHAEL M. KARIMI  
Deputy Attorney General  
4 State Bar No. 260906  
600 West Broadway, Suite 1800  
5 San Diego, CA 92101  
P.O. Box 85266  
6 San Diego, CA 92186-5266  
Telephone: (619) 738-9607  
7 Facsimile: (916) 732-7920  
E-mail: Michael.Karimi@doj.ca.gov  
8 *Attorneys for Complainant*

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

13 In the Matter of the Accusation Against:

Case No. BPPE24-0635

14 **JEM COLLEGE**  
15 **11850 Pierce Street, Suite 100**  
16 **Riverside, CA 92505**

**ACCUSATION**

17 **Approval to Operate Institution Code No.**  
18 **3302761**

Respondent.

19 **PARTIES**

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

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

28 ///

1 **JURISDICTION**

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

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

10 5. Section 94875 provides, in pertinent part:

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

14 **STATUTORY PROVISIONS**

15 6. Section 94877 provides, in pertinent part:

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

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

22 7. Section 94932 provides:

23 The bureau shall determine an institution's compliance with the requirements  
24 of this chapter. The bureau shall have the power to require reports that institutions  
25 shall file with the bureau in addition to the annual report, to send staff to an  
26 institution's sites, and to require documents and responses from an institution to  
27 monitor compliance. When the bureau has reason to believe that an institution may  
28 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.

///

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                 ...

### **COST RECOVERY**

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

///

///

///

1 **CAUSE FOR DISCIPLINE**

2 **(Failure to Comply with Citations)**

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

8 **PRAYER**

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

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

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

18 3. Taking such other and further action as deemed necessary and proper.  
19

20 DATED: 11/20/2025

"Original Signature on File"  
DEBORAH COCHRANE  
Chief

21  
22 Bureau for Private Postsecondary  
Education  
Department of Consumer Affairs  
State of California  
Complainant

23  
24 SD2025802311 / 85318131  
25  
26  
27  
28