

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

In the Matter of the Statement of Issues Against:

**IPSB SCHOOL OF INTEGRATIVE PSYCHO-STRUCTURAL BODYWORK**

1323 Lincoln Blvd. Suite 230

Santa Monica, CA 90401

Institution Code: 98908029

BPPE Case No.: BPPE24-1088

OAH No. 2025070823

Respondent.

**DECISION AND ORDER**

The attached proposed decision is hereby accepted and adopted by the Director of the Department of Consumer Affairs as the Decision in the above-entitled matter.

This Decision shall become effective on DEC 24, 2025.

It is so ORDERED November 20, 2025.



RYAN MARCROFT  
Deputy Director  
Legal Affairs Division  
Department of Consumer Affairs

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

**In the Matter of the Statement of Issues Against:**

**IPSB SCHOOL OF INTEGRATIVE PSYCHO-STRUCTURAL  
BODYWORK,**

**Respondent.**

**Agency Case No. BPPE24-1088**

**OAH No. 2025070823**

**PROPOSED DECISION**

Julie Cabos Owen, Administrative Law Judge, Office of Administrative Hearings (OAH), State of California, heard this matter by videoconference on October 27 and 28, 2025. Deborah Cochrane (Complainant) was represented by Christine J. Lee, Deputy Attorney General. IPSB School of Integrative Psycho-Structural Bodywork (Respondent) was represented by Adam O. Stone, So. Cal. Realty Law, APC.

Testimony and documents were received in evidence. The record closed and the matter was submitted for decision on October 28, 2025.

---

## **FACTUAL FINDINGS**

### **Jurisdictional Matters**

1. On March 15, 2005, the Bureau for Private Postsecondary Education (Bureau or BPPE), Department of Consumer Affairs, issued full approval for Respondent to operate. That approval expired on April 20, 2021.
2. On May 20, 2021, the Bureau received an application for renewal of approval to operate a non-accredited institution (application) from Respondent, then owned by Foundation of Life Energy, Inc.
3. In 2023, while the application was pending, the Bureau received an application for transfer of Respondent's ownership to Team Ortolano, LLC, held by Sabrina and Cindi Ortolano. The Bureau approved Respondent's change of ownership.
4. During the application's pendency, the Bureau noted numerous deficiencies about which the parties corresponded in an attempt at remediation.
5. The Bureau denied the application on September 24, 2024.
6. Respondent appealed the denial and requested a hearing.
7. On June 25, 2025, Complainant signed and subsequently filed the Statement of Issues while acting in her official capacity as Chief of the Bureau.
8. Respondent filed a Notice of Defense, and this matter was set for hearing.

//

## **Correspondence Regarding Deficiencies**

9. On December 22, 2021, the Bureau sent Respondent a letter (First Deficiency Letter) detailing deficiencies in Respondent's application. On January 28, 2022, February 1, 2022, and September 21, 2022, Respondent responded to the First Deficiency Letter, and attempted to address the identified deficiencies.

10. On October 28, 2022, the Bureau sent Respondent a letter (Second Deficiency Letter) detailing remaining deficiencies in Respondent's application. On March 3, 2023, Respondent responded to the Second Deficiency Letter, and attempted to address the remaining deficiencies.

11. On January 17, 2024, the Bureau sent Respondent a letter (Third Deficiency Letter) detailing remaining deficiencies in Respondent's application. Respondent did not remedy the Bureau-identified remaining deficiencies. Consequently, the Bureau issued the September 24, 2024 denial.

12. On October 2, 2025, the Bureau received a mitigation packet from Respondent (First Mitigation Packet). On October 9, 2025, the Bureau reviewed the First Mitigation Packet and noted remaining deficiencies.

13. On October 27, 2025, the first day of hearing, Respondent provided an additional mitigation packet to address any remaining deficiencies (Second Mitigation Packet). (Complainant's timeliness objection was overruled, and the Second Mitigation Packet was admitted into evidence.) The Bureau reviewed the Second Mitigation Packet and identified remaining deficiencies.

//

14. Bureau Licensing Analyst, Tamika Garvin, testified at the administrative hearing. She asserted several deficiencies remained, and she explained her position, as set forth below.

#### **FAILURE TO PROVIDE REVIEWED FINANCIAL STATEMENTS**

15. In its application, Respondent indicated the financial reports required for submission with the application "are being prepared and will follow." (Exhibit 16, p. A94.)

16. Respondent's First Mitigation Packet included a review from Certified Public Accountant (CPA) I.S. Kroop, which stated, "We have reviewed the accompanying Income Statement of IPSB at Life Energy Institute a Division of Foundation for Life for Energy, Inc. for the twelve months ending December 31, 2020." (Exhibit 21, p. A472.) CPA Kroop also noted:

Based on our review, with the exception of the matters described in the following paragraph, we are not aware of any material modifications that should be made to the accompanying financial statements in order for them to be in conformity with accounting principles generally accepted in the United States of America.

Management has elected to only report on IPSB at Life Energy Institute not the entire Company. Management has elected not to have financial notes and disclosures included with this report. Generally accepted accounting principles [[GAAP]] require that such statements and items be presented when financial statements purport to present

financial position and results of operations. If the omitted disclosures and statements were included with this Income Statement, they might influence the user's conclusions about the Company's financial position, results of operations, and changes in financial position. Accordingly, this financial statement is not designed for those who are not informed about such matters.

(Exhibit 21, p. A472.)

17. In her testimony, Ms. Garvin noted applications for renewal must include reviewed or audited financial statements completed by independent CPA in conformity with GAAP. Although Respondent provided a balance sheet, profit and loss statement, and income statement for January through December 2020, Respondent never submitted any reviewed or audited financial statements completed by an independent CPA in conformity with GAAP. Ms. Garvin also noted that, because the application remains pending, Respondent would need to submit current financial statements reflecting Respondent's current ownership.

18. At hearing, Sabrina Ortolano testified on behalf of Respondent. She noted she has had difficulty obtaining financial statements from the former owner, and she acknowledged the remaining deficiency regarding the provision of financial statements. She assured the Bureau she would be meeting with a CPA the following day "to see about getting reviewed financial [statements] turned in as soon as possible."

//

## **CATALOG - LANGUAGE PROFICIENCY INFORMATION**

19. Respondent's current proposed catalog provides the following regarding language proficiency:

### **FOREIGN STUDENTS/ LANGUAGE REQUIREMENTS**

IPSB does not offer visa or language services. All courses are presented in the English language only and students must be able to comprehend lesson plans, instructions from instructor and feedback provided by clients to a level sufficient to administer services safely and effectively. No provisions are made for foreign language translation, or for translators to be present in class. Applicants who are [English as a Second Language (ESL)] Students must have successfully completed ESL studies prior to application. Proficiency documentation shall include certifications showing completed ESL course or equivalent accreditations confirming the English comprehension level stated above.

(Exhibit A, p. B11.)

20. Ms. Garvin acknowledged Respondent's updated catalog contained language proficiency information. However, Ms. Garvin asserted the language proficiency information in Respondent's catalog pertained only to proficiency certifications required for ESL students but not the language proficiency required for all students. According to Ms. Garvin, the catalog must specify the acceptable level of English language proficiency for all students such as "10th grade level" or "completion of high school." However, her assertions are not persuasive.

21. No grade-level language proficiency requirement is indicated in the applicable statutes or regulations. (See Legal Conclusions, below.) Moreover, Respondent's catalog contains a general language proficiency requirement that all students must be able to comprehend the English language instruction "at a level sufficient to administer services safely and effectively." (Exhibit A, p. B11.) Consequently, Respondent's proposed catalog does not contain any deficiency in its language proficiency provisions.

#### **CATALOG - TOTAL CHARGES FOR PERIOD OF ATTENDANCE**

22. In its First Mitigation Packet, Respondent's proposed catalog details the sole remaining program available to its students, the Integrative Massage & Bodywork Program (IMBP). The IMBP requires a total of 550 hours of instruction from a list of classes, each with a specified number of class hours. The catalog also lists elective courses available outside the IMBP program. Students can enroll as IMBP students or non-program/pay per-class students. The catalog specifies:

##### **BODYWORK PROGRAM (IMBP) 550 HOURS**

Program Price: \$11,005 Non-Program Price: \$12,097

The approximate cost of materials and books for the program is \$400

The estimated schedule of total charges for the entire educational program is \$11,405.

(Exhibit 21, p. A546.)



23. The catalog also specifies on the same page, "The payment rate for the entire program is the same for the period of attendance." (Exhibit 21, p. A546.)

24. In its mitigation review, the Bureau noted Respondent's catalog contains the program price, non-program price, and estimated schedule of total charges for the entire educational program. However, the Bureau asserted, "the catalog does not include the schedule of total charges for a period of attendance or the estimated schedule of total charges for the entire educational program price for the program and non-program students." (Exhibit 22, p. A590.)

25. In its Second Mitigation Packet, Respondent's sought to address the alleged remaining deficiency. Its proposed catalog contained the same schedule of classes for the IMBP, requiring 550 total hours from listed classes, each with specified class instruction hours. The proposed catalog also specified:

**BODYWORK PROGRAM (IMBP) 550 HOURS**

Program: \$11,005 - \$20 / class hour

The approximate cost of materials and books for the program is as follows: IMBP \$400

The estimated schedule of total charges for the entire educational program: \$11,500.

(Exhibit A, p. B13.)

//

26. In its Second Mitigation Packet, Respondent's proposed catalog still noted, "The payment rate for the entire program is the same for the period of attendance." (Exhibit A, p. B13.)

27. At hearing, Ms. Garvin insisted Respondent's catalog remained deficient because it does not have language regarding the "schedule of total charges for the period of attendance." When asked what additional language was needed to cure the deficiency, she stated that it "could be same as the \$11,500 [total charges for entire program] . . . if the schedule of total charges for completing the program was the same as the schedule of total charges for a period of attendance," but "the language must be there for both." Ms. Garvin's assertions were confusing and not persuasive.

28. Given that the statutory definition of "period of attendance" is "the entire educational program" for a program like IMBP (see Legal Conclusions), the language in Respondent's catalog (that "the estimated schedule of total charges for the entire educational program is \$11,500," and "the payment rate for the entire program is the same for the period of attendance") sufficiently states the total charges for the "period of attendance."

#### **REFUND POLICIES IN CATALOG AND ENROLLMENT AGREEMENTS**

29. Respondent's catalog is statutorily required to contain a detailed description of institution policies including cancellation, withdrawal, and refund policies. (See Legal Conclusions.)

30. Respondent's catalog has consistently contained a detailed description of its withdrawal and refund policies, including the following formulas for refunds:

//

Refunds are based on the following formulas and on  
advanced payment in full

10% Hours of Instruction 90% Refund

25% Hours of instruction 75% Refund

50% Hours of instruction 50% Refund

60% Hours of instruction 40% Refund

75% Hours of instruction 25% Refund

100% Hours of instruction No Refund

(Exhibit 11, p. A304; Ex. A, p. B14.)

31. Complainant alleges in the Statement of Issues that "the withdrawals and refund policies referenced in the catalog are different from the withdrawals and refund policies referenced on the enrollment agreements." (Exhibit 1, para. 41, subd. (m).) This assertion was initially accurate. In response to the Bureau's First Deficiency Letter, Respondent submitted a sample enrollment agreement form that contained inconsistent/incomplete refund formulas compared to Respondent's catalog. Specifically, the first submitted enrollment agreement form contained only the following formulas: "10% Hours of Instruction: 90% Refund[;] 25% Hours of Instruction: 75% Refund[;] 50% Hours of Instruction: 50% Refund[;] and 60% Hours of Instruction: 40% Refund." (Exhibit 9, p. A214.)

32. However, in its First Mitigation Packet, Respondent provided an updated sample enrollment form that contained the same refund formulas as Respondent's catalog; specifically: "10% Hours of Instruction: 90% Refund. 25% Hours of Instruction:

75% Refund. 50% Hours of Instruction: 50% Refund. 60% Hours of Instruction: 40% Refund. 75% Hours of Instruction: 25% Refund. 100% Hours of Instruction: No Refund." (Exhibit 21, p. A498.) At hearing, Ms. Garvin admitted that, with the updated enrollment agreement form, the deficiency regarding the withdrawal and refund information was corrected.

### **HOMEPAGE FAILURE TO INCLUDE REQUIRED LINKS**

33. Respondent's website homepage is required to have clear and conspicuous links for the following: a current catalog; school performance facts sheets for each educational program; a student brochure (if applicable); the Bureau's website; and the most recent annual report submitted to the Bureau. (See Legal Conclusions.)

34. In its First Mitigation Packet, Respondent provided screenshots of its website homepage, noting that there was a clear and conspicuous link to the school catalog. However, there were no clear and conspicuous links on the homepage to: school performance facts sheets, annual reports, and the Bureau's website. These links were accessible only by using a dropdown menu and navigating to a "disclosures" page where the links were found. (Exhibit 21, p. A503-A505.)

35. In its Second Mitigation Packet, Respondent changed its homepage so the links to school performance facts sheets and annual reports were found by clicking on the "About" tab and accessing a dropdown menu. There was no clear link to the Bureau's website in the "About" dropdown menu. (Exhibit A, p. B16.) Respondent also noted there was a disclosures page link on the bottom of every page of its website. (*Ibid.*)

36. As Ms. Garvin accurately noted in her testimony, a deficiency remains. Links to the listed information must be "clear and conspicuous" on the website

homepage. Links in the "About tab" dropdown menu, or links accessible only by clicking on the link to the disclosures page, do not comply with the "clear and conspicuous" requirement.

## **LEGAL CONCLUSIONS**

### **Relevant Statutes and Regulations**

1. Education Code section 94875 authorizes the Bureau to regulate private postsecondary educational institutions under the California Private Postsecondary Education Act of 2009 (Act), sections 94800 through 94950.

2. Education Code section 94885 requires the Bureau to adopt regulations regarding the minimum operating standards for institutions including the standards for facilities and materials "sufficient to enable students to achieve the educational program's goals," financial solvency, maintenance of adequate records and transcripts, and operation in compliance with the Act and other applicable laws.

3. The Bureau may grant an application for approval to operate a private postsecondary education institution "only after an applicant has presented sufficient evidence to the Bureau . . . that the applicant has the capacity to satisfy the minimum operating standards." (Ed. Code, § 94887.) "The Bureau shall deny an application for an approval to operate if the application does not satisfy those standards." (*Ibid.*)

4. Institutions that have been operating with the Bureau's approval must periodically apply to the Bureau for a renewal of their approval to operate. "To be granted a renewal of an approval to operate, the institution shall demonstrate its

continued capacity to meet the minimum operating standards." (Ed. Code, § 94891, subd. (b).)

5. To implement Education Code section 94891, the Bureau promulgated California Code of Regulations, title 5 (CCR), section 71475 specifying requirements for renewal applications. Pursuant to CCR section 71475, renewal applicants must submit current financial statements that meet the requirements of CCR section 74115, i.e., financial statements must be either audited or reviewed, depending on the institution's gross revenues. (CCR, § 71475, subd. (e).) The renewal applicant must also submit a copy of the institution's catalog, which must meet the requirements of the Act and CCR section 71810. (CCR, § 71475, subd. (bb).)

6. To demonstrate that "[t]he institution is financially sound and capable of fulfilling its commitment to students" (Ed. Code, § 94885, subd. (a)(6)), audited or reviewed financial statements must comply with requirements set forth in CCR sections 74115 and 71745. Financial statements must include a balance sheet, an income statement, and a cash flow statement. (CCR, § 74115, subd. (b).) The financial statements must be audited or reviewed, and they must be prepared on an annual basis by an independent CPA in accordance with GAAP. (*Ibid.*) They must also demonstrate that the institution meets certain financial resources requirements. (*Ibid.*) The financial statements must be "current," that is "completed no sooner than 120 days prior to submission to the Bureau and covering no less than the most recent complete fiscal year." (CCR, § 74115, subd. (d).) If more than eight months will have elapsed from fiscal year end to the time of submission, the statements shall also cover no less than five months of the current fiscal year. (*Ibid.*)

7. CCR section 71810, subdivision (b)(4), requires an institution's catalog to include the following information:

(4) Language proficiency information, including:

(A) the level of English language proficiency required of students and the kind of documentation of proficiency, such as the Test of English as a Foreign Language (TOEFL), that will be accepted; and

(B) whether English language services, including instruction such as ESL, are provided and, if so, the nature of the service and its cost[.]

8. Education Code section 94909, subdivision (a)(9), requires an institution's catalog contain "The schedule of total charges for a period of attendance and an estimated schedule of total charges for the entire educational program." Education Code section 94870 defines "Total charges" as "the sum of institutional and noninstitutional charges." Education Code section 94854 defines "Period of attendance" as "a semester, quarter, or trimester for educational programs measured in credit hours and the entire educational program if measured in clock hours."

9. Education Code section 94909, subdivision (a)(8)(B), requires an institution's catalog to contain a detailed description of institution policies, including cancellation, withdrawal, and refund policies. Pursuant to CCR section 71750, subdivision (b), "an institution may not enforce any refund policy that is not specified in the catalog."

//

10. Pursuant to CCR section 74117, "an institution that maintains a website shall provide on the homepage of that website clear and conspicuous links to all the items required in [Education Code] Section 94913(a)."

11. Education Code section 94913, subdivision (a), specifies:

An institution that maintains an internet website shall provide on that internet website the current version of all of the following:

(1) The school catalog.

(2) A School Performance Fact Sheet for each educational program offered by the institution.

(3) Student brochures offered by the institution.

(4) A link to the bureau's internet website.

(5) The institution's most recent annual report submitted to the bureau.

## **Causes for Denial**

### **FIRST CAUSE FOR DENIAL**

12. At the hearing, Complainant withdrew the First Cause for Denial. Consequently, cause does not exist to deny Respondent's application for renewal of approval to operate, under CCR sections 71475, subdivision (c)(2) and (4), and 71660, for failure to specify if a classroom is a satellite location or an update of Respondent's main location address.



## **SECOND CAUSE FOR DENIAL**

13. Although Respondent provided a balance sheet, profit and loss statement, and income statement for January through December 2020, Respondent failed to submit reviewed financial statements completed by an independent CPA in conformity with GAAP.

14. Cause exists to deny Respondent's application for renewal of approval to operate, under Education Code sections 94891, subdivision (b), and 94885, subdivision (a)(6), and CCR sections 74115 and 71745, in that Respondent did not provide currently reviewed financial statements prepared by an independent CPA in conformity with GAAP. (Factual Findings 15 through 18; Legal Conclusions 1 through 6.)

## **THIRD CAUSE FOR DENIAL**

15. In the Statement of Issues, Third Cause for Denial, paragraph 41, Complainant alleges Respondent's application for renewal is subject to denial under Education Code section 94891 subdivision (b), in conjunction with the CCR section 71700, for failing to meet the legally required minimum operating standards. Based on all mitigation information admitted at hearing, Complainant withdrew the allegations of deficiencies alleged in the Statement of Issues, Third Cause for Denial, paragraph 41, subdivisions (a), (b), (c), (d), (e), (f), (g), (h), (j), (k), (n), (o), (p), (q), (s), and (t). The alleged remaining deficiencies (in paragraph 41, subds. (i), (l), (m), and (r)) are addressed below.

16. Complainant failed to establish the allegations in the Statement of Issues, paragraph 41, subdivision (i). CCR section 71810, subdivision (b)(4), requires an institution's catalog to include language proficiency provisions. However, that regulation focuses on English language proficiency for ESL students, and it does not

require specification of English language grade-level proficiency for all students, as Complainant asserts. Nevertheless, Respondent's catalog contains a general language proficiency requirement in that all students must be able to comprehend the English language instruction at a level sufficient to administer services safely and effectively. Given the foregoing, Respondent's proposed catalog does not contain any deficiency in its language proficiency provisions.

17. Cause does not exist to deny Respondent's application for renewal of approval to operate, under Education Code sections 94891, subdivision (b), and CCR 71810, subdivision (b)(4), in that Respondent's proposed catalog does not contain any deficiency in its language proficiency provisions. (Factual Findings 19 through 21; Legal Conclusions 1 through 4, and 7.)

18. Complainant failed to establish the allegations in the Statement of Issues, paragraph 41, subdivision (f). Education Code section 94909, subdivision (a)(9), requires an institution's catalog contain "The schedule of total charges for a period of attendance and an estimated schedule of total charges for the entire educational program." Education Code section 94854 defines "Period of attendance" as "a semester, quarter, or trimester for educational programs measured in credit hours and the entire educational program if measured in clock hours." In this case, Respondent's educational program is measured in clock hours; thus, its "period of attendance" is equivalent to its entire educational program. Consequently, the language in Respondent's catalog (that "the estimated schedule of total charges for the entire educational program is \$11,500," and "the payment rate for the entire program is the same for the period of attendance") sufficiently states the total charges for the "period of attendance." Therefore, Respondent's catalog does not contain a deficiency regarding the schedule of total charges for a period of attendance.

19. Cause does not exist to deny Respondent's application for renewal of approval to operate, under Education Code sections 94891, subdivision (b), 94909, subdivision (a), 94870, and 94854, in that Respondent's proposed catalog does not contain any deficiency regarding the schedule of total charges for a period of attendance. (Factual Findings 22 through 28; Legal Conclusions 1 through 4, and 8.)

20. Complainant failed to establish the allegations in the Statement of Issues, paragraph 41, subdivision (m). Education Code section 94909, subdivision (a)(8)(B), requires an institution's catalog to contain a detailed description of an institution's policies including withdrawal and refund policies. Respondent's catalog has consistently contained a detailed description of its withdrawal and refund policies. Additionally, at hearing, Ms. Garvin admitted that, with the updated enrollment agreement form, the alleged deficiency regarding the withdrawal and refund information was corrected.

21. Cause does not exist to deny Respondent's application for renewal of approval to operate, under Education Code sections 94891, subdivision (b), and 94909, subdivision (a)(8)(B), in that Respondent's proposed catalog and enrollment agreement form do not contain any deficiencies regarding the description of Respondent's withdrawal and refund policies. (Factual Findings 29 through 32; Legal Conclusions 1 through 4, and 9.)

22. Respondent's website homepage is required to have clear and conspicuous links for: a current catalog; school performance facts sheets for each educational program; a student brochure (if applicable); the Bureau's website; and the most recent annual report submitted to the Bureau. While the homepage has a clear link to the catalog, a deficiency remains in that links to the remaining information are

accessible only in the "About tab" dropdown menu or by clicking on the link to the disclosures page. This does not comply with the "clear and conspicuous" requirement.

23. Cause exists to deny Respondent's application for renewal of approval to operate, under Education Code sections 94891, subdivision (b), and 94913, subdivision (a), and CCR section 74117, in that Respondent failed to provide, on its website homepage, clear and conspicuous links to specified information. (Factual Findings 33 through 36; Legal Conclusions 1 through 4 and 10 through 11.)

### **Disposition**

24. The Bureau may provide conditional authorization to continue operating while bringing an institution into full compliance, under certain circumstances. CCR section 71400, subdivision (d)(1), provides:

When specific minor deficiencies are identified during processing, but the institution is substantially in compliance with the requirements of the [Education] Code and this Division, a conditional authorization to operate may be granted for a period not to exceed six (6) months, to permit the institution to correct those deficiencies identified. If those deficiencies are not corrected after the first period of conditional approval, or the condition upon which an approval may be granted is not satisfied, the conditional authorization to operate may be extended for a period not to exceed six (6) months if the program demonstrates to the Bureau a good faith effort and ability to correct the deficiencies. A conditional authorization to operate shall

expire at the end of its stated period and the application shall be deemed denied, unless the deficiencies are removed prior to its expiration and an approval to operate has been granted before that date.

25. In this case, the Bureau repeatedly identified deficiencies throughout the processing of Respondent's application for renewal, and the Bureau allowed Respondent to bring itself into compliance. Given the remaining deficiencies despite the protracted application process, the Bureau was justified in denying Respondent's still-deficient application.

26. Nevertheless, there were some extenuating circumstances in that Respondent had a change of ownership two years into the application process. The acquisition and CPA review of financial statements from the former owner was apparently challenging, and Ms. Ortolano has had to address numerous deficiencies. Ms. Ortolano is making an effort to comply with the laws governing Respondent's operation, and Respondent has come into compliance with most of those laws. Although one significant remaining deficiency (financial statements) and one minor deficiency (website home page links) remain, a conditional authorization to operate for three months is warranted given the institution's lengthy history of operation. During that three-month period, Respondent must bring itself into compliance with the current statutes and regulations governing continued licensure.

//

//

## ORDER

Respondent's application for renewal of the Bureau's approval to operate is granted conditionally for a period of three months from the effective date of this decision. Within the three-month conditional approval period, Respondent shall take all actions necessary to demonstrate to the Bureau's satisfaction that it is fully compliant with the statutes and regulations governing its continued operation.

If Respondent removes the remaining deficiencies (regarding financial statements, and website homepage links) to the Bureau's satisfaction within the three-month period, the Bureau shall issue Respondent an approval to operate. If the deficiencies are not removed prior to the expiration of the three-month period, and an approval to operate has not been granted before that date, the conditional authorization to operate shall expire and the application shall be deemed denied.

DATE: 11/12/2025



JULIE CABOS OWEN

Administrative Law Judge

Office of Administrative Hearings